

Senate Workforce & Higher Education Committee
November 30, 2022
Written Testimony on HB 509
Robyn M. Finkenthal, Ph.D., NCSP, School Psychologist

Chairman Johnson and Members of the Senate Workforce & Higher Education Committee,

I appreciate this opportunity to provide written testimony on HB 509.

My name is Robyn Finkenthal and I am a 35 year veteran school psychologist holding a license from the Ohio Department of Education (21860031). Further, I have earned and maintained the designation of Nationally Certified School Psychologist (NCSP) (117096) through the National Association of School Psychologist (NASP). I retired in June, 2022 from Parma City School District in Cuyahoga County. I am not personally licensed through the Ohio Board of Psychology, but in the interest of complete disclosure have been considering this pathway as a means of meaningful, part-time work in retirement.

I am imploring your committee to reconsider and substantially revise the section of HB 509 pertinent to psychologist licensure which, as written, essentially eliminates the opportunity for a school psychologist to be independently licensed in the state of Ohio. In a press release dated March 24, 2022, titled "Substitute House Bill 509 Passes the Ohio House," it states, "The goal of this legislation is to make the state of Ohio the best place to work, live, and start a business, all while removing barriers one may have when attempting to enter a new career field." Additionally, in a direct quote from Fowler Arthur (R-Ashtabula, Ohio House of Representatives) regarding HB 509, "We were able to find areas to cut red tape, reduce bureaucracy, and increase Ohioan's accessibility to licensed career paths." Please understand that in providing this testimony, I have no doubt that many legislators worked very hard to meet their duty of providing the best piece of legislation they were able to draft. However, in relation to the language I cite, HB 509 falls short of the intended goals. In fact, I will go as far as to say that, if enacted, HB 509 will result in irreparable damages at a number of levels.

It is critical to recognize that the independent license for school psychologists in Ohio is in no way duplicative or redundant with the Ohio Department of Education (ODE) credential. The essential, unmistakable difference is that the Ohio Board of Psychology license allows and regulates a school psychologist to practice outside of school settings whereas the ODE credential restricts practice to working in schools. Why is there a need or what is the justification for school psychologists to practice outside of school settings? Although not an exhaustive list by any means, here are some reasons. Many of us have developed specific areas of training or interest that do not fit within the "generalist model" typically in place for service delivery in schools. Perhaps we have developed expertise in autism or specific learning disabilities, for example, that better fit a "specialist model" of service delivery in private practice. We may desire to consult or offer inservice or training to a greater extent than school service delivery models allow. Independent Educational Evaluations (IEEs) that are required by law to parents disagreeing with school districts' findings can be conducted by independently

practicing school psychologists. We are completely capable of making data-based decisions regarding mental health diagnoses extending beyond the disabilities enumerated in the Individuals with Disabilities Education Act (IDEA) and may find our niche in that way. To summarize, the belief that the profession of school psychology practice is, by definition, restricted to school settings, is erroneous in my opinion. I personally feel that the different titles and terminology used in credentialing and licensing loses sight of what school psychologists are actually trained to do. We are highly educated professionals, with clear and focused expertise in issues related to learning and child development, who can contribute our skills both within schools and in separate settings. As all professionals, we are required to work within our scope of training and experience both legally and ethically. We are required to work under the guidelines of the agencies credentialing us. Finally, by eliminating the independent license for school psychologists in Ohio, you have not met your stated goals for HB 509 because in no way do the changes you have proposed “remove barriers one may have when attempting a new career field.” It restricts us to practice within schools. Further, it does not make Ohio “the best place to work, live, and start a business,” as in fact, careers and private businesses will be destroyed. I may add that these businesses have been poorly informed and notified of next steps should HB 509 pass the Ohio Senate, which is inexcusable since their livelihoods are at risk. Last, and most importantly, children, families, schools, and other related professionals will lose a valuable source of psychological services within a communities already underserved across Ohio. The guiding principle of all legislation should be for the betterment of the public you serve.

I will admit that passage of HB 509 will meet the stated goal to “cut the red tape.” I personally see negligible advantage to that for either the Ohio Board of Psychology or the professionals they license. There are fees paid to the Ohio Board of Psychology for their services. It increases the strength of their membership. The correct agency is then responsible for setting necessary entry requirements and regulations. Although licensure with the Ohio Board of Psychology brings yet another set of professional development criteria to meet, school psychologists have willingly agreed to maintain this additional set of criteria (or they would not apply for an independent license). **If there is any duplication or redundancy in credentials and/or licensure, I would recommend that the committee look closely at the NASP’s National Certificate, which in many states can be used to gain the credential to practice and maintain the ability to work in schools. The NCSP can be used in lieu of a separate State Educational Agency (SEA) credentialing process.**

Thank you for your time in considering this testimony and for your service. I welcome further contact if it would be helpful.

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