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## Senate Workforce & Higher Education Committee

Dec. 6, 2022

Testimony on HB 509

Rachel Chilton, Executive Director, Ohio School Psychologists Association

Chairman Johnson and members of the Senate Workforce and Higher Education Committee, thank you for the opportunity to again provide testimony on HB 509 and the omnibus amendment.

We appreciate that this committee has restored the private practice school psychology license in this omnibus amendment; however, we are at the same time vehemently opposed to the language that would move the 3,000 school psychologists licensed under Department of Education under the oversight of the State Board of Psychology, a change which neither that board nor school psychologists wants and a change that would only create additional expenses for the state.

State Board of Psychology Executive Director Ronald Ross was unable to be here this morning, but I know that he has reached out to the chairman's office about his opposition to the change.

As a refresher, the State Board of Psychologists currently oversees about 200 school psychologists with the private practice license. ODE meanwhile licenses the other 3,000 school psychologists in Ohio, which are the ones working within the confines of a school.

ODE is the correct and appropriate agency to license these school-based employees who are authorized only to work in schools. ODE has oversight of special education rules and regulations, such as the operating standards for children with disabilities, which is the largest part of the school psychologist's job and the main reason this needs to stay under ODE. The State Board of Psychology has no expertise in school-based special education services and how school-based school psychs deliver those services.

School psychologists are experts in Ohio special education rules and processes, which are regulated by ODE. They are usually the case manager on the school-based teams responsible for evaluating students who might need special education services. They have advanced training in schoolwide and student-specific intervention strategies and progress monitoring techniques to determine if the strategies are working.

As mentioned, the State Board of Psychology does not have expertise in special education law or standards for children with disabilities. The State Board of Psychology does not promulgate school-based special education rules, nor do they have monitoring authority for compliance purposes. They do not have expertise in delivery of special education services. They also are not the appropriate agency to investigate school-based employees, only authorized to work in

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schools, for possible ethical violations; the Ohio Department of Education is the correct and appropriate agency to do so.

At present, school psychs can call the Office of Exceptional Children at ODE and ask questions. OEC has a long-standing supportive relationship with these school psychologists. They provide technical support and professional development and work closely with our organization and the university training programs. Will the legislature fund the establishment of a duplicate office at the State Board of Psychology to provide this consultation to its licensees?

The Office of Exceptional Children also has the responsibility to monitor school districts for State and Federal Special Education law and rule compliance. School psychologists are often the experts in their school buildings to help assure compliance. When found not to be in compliance they often work with school administrators and ODE to develop plans to remedy the compliance citations.

The other unanswered question is how this will impact on the current school psychology internship program. All school psychs are required to complete their education with a year-long internship in an Ohio school. ODE currently issues a Temporary Pupil Services License in School Psychology. Funding for this program also flows through ODE. What licensure would interns have to work in the schools during the internship period?

The ODE school psychology license is already under the umbrella of the Pupil Services License, which also encompasses speech language pathologists and audiologists, occupational therapists and physical therapists. School psychs very often work on teams with these other professionals to deliver services to children. So, if the aim of this legislation is to identify efficiency in the issuance of licenses, the Pupil Services License already accomplishes that.

The amendment also drastically reduces the number of continuing education hours required for school-based school psychologists from 180 hours every five years to only 50 hours. That's 130 fewer hours of training. Without an appropriate level of continuous learning on the latest research and best practices, children could be harmed by inappropriate delivery of services. No one is asking for this change.

This amendment simply shifts the burden and expense of licensing and overseeing the practice of school psychology from one agency to another. It benefits no one: not the State Board of Psychology and its limited resources, not the Department of Education by taking away its authority to regulate the practice of school psychology and delivery of special education services in schools, and certainly not the school psychologist who will have to navigate the changes to their license renewal and where to turn when they have questions.



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We have heard the comparison made to the school nurse license, which the legislature opted to eliminate in favor of allowing those with a nursing license to operate in schools. This, like other related service professionals who are licensed by their medical boards are distinguishable from ODE licensed school psychologists as they are trained in more of a medical, therapeutic model offering specific therapies. ODE licensed school psychologists training is based on a school team approach model solely focusing on students' academic and behavioral health needs related to their learning progress. In this way keeping them under ODE oversight makes complete sense.

At the end of the day, what does the amendment accomplish? We currently have two school psychology licenses in Ohio. This bill will not change that. This change is likely to create more problems than it would solve. Given the short turnaround on this proposal, we respectfully request that any changes to these licenses be paused so that the Department of Education and State Board of Psychology can assess whether such a move is feasible. We would welcome the opportunity to revisit this topic with senators next session.

Thank you for your time. I would be happy to answer any questions.