HB 49 Talking Points

HB49 (The Budget Bill) proposes consolidating a number of professional regulatory boards. For example, the Ohio Board of Psychology, the Counselor, Social Worker and Marriage and Family Therapy Board and the Chemical Dependency Counselor Board are combined into the Behavioral Health and Social Work Board.

Ohio Psychologists and the Ohio Psychological Association oppose consolidation of regulatory boards and eliminating the Board of Psychology because:

1. The Boards are self-sufficient: License fees fully fund the cost of board operations. The Boards operate efficiently through group purchasing and shared services. **No tax payer dollars are saved by consolidation of boards.**

2. The behavioral healthcare occupational licensing boards have no operational deficiencies that need to be fixed. There have been significant **problems in other states with consolidation leading most to return to independent boards.**

3. The behavioral healthcare professions are each distinct and separate in training curriculum and standards, ethics codes, accrediting bodies, scopes of practice, and treatment modalities. A "one size fits all" model will not work.

4. The role of Board members on each board is different. For the Board of Psychology Board members have significant responsibilities: **supervise complaint investigations, participate in the examination of individuals seeking to be licensed, and provide training in the laws and rules for Applied Behavior Analysts.**

5. Consolidation of boards **dilutes the stature of the distinct professions** and these licensed professionals believe consolidation significantly diminishes the value of their license. **While the structure of separate Boards looks like silos, the Psychology Board has always reached out to all stakeholders for input when developing rules and policy.** The Psychology Board regulates psychologists, school psychologists and applied behavior analysts, who work with people on the autism spectrum, which has proven to be a thoughtful and appropriate grouping.

6. **Consolidation discourages students from enrolling in the State’s graduate educational programs** and discourages people from entry into our marketplace. The licensing process will be significantly slower. Ohio already has a shortage of mental health professionals, especially in some areas of the state. We need to make Ohio more attractive to psychologists not less attractive.

7. The **public is better protected by maintaining independent, autonomous licensing boards** whose mission is public protection by overseeing their individual licensees. This is one of the main reasons that states that have had consolidated boards have gone back to independent boards.

8. **One behavioral healthcare profession should NOT be allowed to have regulatory authority over another behavioral healthcare profession.** With a large board there would have to be committees for each profession, and committee members who investigate and recommend
disciplinary action cannot also participate in a vote on board action – resulting in one profession disciplining other professions.

9. **Combining the boards would be costly** – leases to cancel, materials to be re-worked, contracts to be worked out, employment issues and loss of employment, retooling expensive data management systems that were just developed, websites to be changed, additional staff to do the work currently done by Board members, etc.

10. Fewer members of each profession and fewer public members would be on a consolidated board. **There will be fewer volunteer board members available to effectively administer** the operation of the board to review complaints and be involved in investigations. This will **result in a backlog in complaint investigations and licensing.**

**Summary**

The mission of the Board of Psychology
- Protection the public - an especially vulnerable population.
- Regulate the practice of psychology and school psychology.
- Regulate the practice of applied behavior analysis to better serve people with autism and similar diagnoses.
- Develop and update Rules and policies affecting these practices.

Current Work Load of Board of Psychology
- 360 psychologist applications received
- 300 oral exams administered by Board members
- 100 Certified Ohio Behavior Analyst trained and examined in laws and rules
- The Executive Director of the Board of Psychology has approximately 20 weekly consultations with licensees by phone or email.

Ohio’s Board of Psychology is nationally recognized as a pioneer in regulatory policy and practice. Among Ohio licensees it is viewed as fair and consistent.

Consolidation would make Ohio one of two states that do not have an independent Board of Psychology. This will send a clear message to psychologists that their discipline is not valued in Ohio which will make it a less appealing state for psychologists to move to and start their businesses. In a state that is currently facing an unprecedented opioid epidemic and has a high concentration of military Veterans, Ohio needs to be attracting more psychologists rather than discouraging them from coming here.