



RI Department of Health
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TTY: 771
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April 24, 2025

The Honorable Representative Joseph J. Solomon, Jr., Chair
House Committee on Corporations
State House
82 Smith St.
Providence, RI 02903

RE: H 5556 -- An Act Relating to Businesses and Professions -- Psychologists

Dear Chair Solomon:

Please accept this letter, with concerns, regarding H 5556, legislation for which the stated intent is to include unlicensed certified school psychologists under the provisions of the Rhode Island General Laws governing the licensing of psychologists and would authorize the licensing of school psychologists for independent practice.

As drafted, the proposed legislation would technically create inconsistencies that will prevent implementation. Besides adding this new school psychologist license type and scope of practice to the existing Psychologists statute (RIGL Section 5-44-3), it also adds it to the existing Mental Health Counselors and Marriage and Family Therapists statute (RIGL Section 5-63.2).

In addition, the new license requirements in RIGL Section 5-44-9.1 (Psychologists) are different than the license requirements in RIGL Section 5-63.2-9(a)(3) (Mental Health Counselors and Marriage and Family Therapists). Oddly, this bill creates a second "licensed school psychologist" category under the Board of Mental Health Counselors and Marriage and Family Therapists. This second license has the same name, has different qualifications, and would be housed under Mental Health Counselors, who do not practice psychology. Their Board lacks the subject matter experts to handle disciplinary matters.

RIDOH is not clear why school psychologists would be included in the Mental Health Counselors and Marriage and Family Therapists section of the RIGLs when the most appropriate placement would be in the Psychologists section of the RIGLs (where the unlicensed practice of school psychology currently resides).

This duplication of the license would create public and legal confusion around which Board would have disciplinary authority over the licensees. It may also create conflicts between the Rhode Island Department of Education (RIDE), which currently certifies school psychologists, and RIDOH as the bill does not appear to alter the certification requirement currently in place through RIDE.

H 5556 would have a negative fiscal impact on RIDOH as it would create two new classes of licensees. As a result, two new applications would have to be created by RIDOH, and the current licensing software will have to be altered to process these two new license types and their respective renewals. RIDOH will also have to process, investigate, and address the complaints filed against these new licensees. This new work will require additional staffing resources at RIDOH.

There are currently about 200 certified school psychologists in Rhode Island. At least one additional .50 FTE would be required to implement this new licensure initiative, at a total cost of \$55,500 (salary and benefits) that would be subject to annual increases. Without this resource, RIDOH is unable to implement the proposed legislation as currently drafted.

I thank you for the opportunity to comment on the proposed legislation.

Sincerely,

A handwritten signature in black ink that reads "Jerome M. Larkin". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jerome M. Larkin, MD
Director

CC: The Honorable Members of the House Committee on Corporations
The Honorable Anthony DeSimone
Nicole McCarty, Esquire, Chief Legal Counsel
Lynne Urbani, Director of House Policy