

# STATE OF RHODE ISLAND



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February 11, 2026

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

## **RE: H 7335 – An Act Relating to Businesses and Professions -- Psychologists**

Dear Chair Solomon:

Please accept this letter of concern regarding H 7335 which “would include licensed school psychologists under the provisions of the general laws governing the regulations of psychologists and would expand the licensing of school psychologists for independent practice.” The bill also amends various provisions of R.I. Gen. Laws § 5-63.2 et seq., an Act relating to Mental Health Counselors and Marriage and Family Therapists.

This bill creates a new license category, “Licensed School Psychologists,” within the Department of Health’s (RIDOH) licensing authority in addition to their current certification through the Department of Elementary and Secondary Education (RIDE). This bill also expands the scope of practice for School Psychologists and Mental Health Counselors (MHCs). While BHDDH recognizes the need for more professionals in our schools who are available to serve the growing behavioral health needs of children and youth, the expansion of the scope of practice that is proposed in this legislation for School Psychologists and MHCs appears to be inconsistent with their current respective education and training.

Current RIDE School Psychologist certification requires an advanced degree in School Psychology from a regionally accredited institution and does not permit practice outside of a school setting. The current MHC license requires a master’s level degree and permits MHCs to practice independently. The scope of practice for MHCs as currently codified is different than the proposed scope of practice for licensed School Psychologists.

In contrast, applicants for the Psychologist license administered by RIDOH, currently are required to have a doctorate degree in psychology or in an allied field from a college or university program that meets the requirements for approval by the American Psychological Association. Individuals so licensed may practice independently.

H 7335 would allow Licensed School Psychologists to “practice outside of these settings or independent of an employment or consulting relationship.” This practice outside of a school setting is expansionary as School Psychologists are not required under their current certification to complete the education and training required of doctorate-level psychologists who may practice independently. School Psychologists are trained to provide services in a school-based setting, not in a community clinical behavioral health setting or as a licensed independent clinical practitioner qualified to diagnose and to provide non-school/academic focused mental health counseling.

Under the provisions of the bill which amends R.I. Gen. Laws § 5-63.2 et seq., the professional services that may be practiced by MHCs also are greatly expanded to include, for example, conducting testing in a school setting, which is an area of expertise in which MHCs are not trained.

The bill does not address the current RIDE School Psychologist certification requirements which may be inconsistent with the licensing requirements proposed in the legislation such as the discrepancy between minimum educational requirements, testing criteria, accreditation requirements, and the number of hours of supervised post-graduate experience.

Dual licensure provisions in the bill establish two titles for the same type of license with different educational and training requirements and oversight for licensure provided by two different licensing boards.

Further, it is unclear which licensing board at RIDOH would have ultimate authority and responsibility to license and oversee School Psychologists. In H 7335, the Board of Psychology is initially identified as the licensing authority; however, subsequently, the Board of Mental Health Counselors and Marriage and Family Therapists (MFTs) also is identified as the licensing authority for School Psychologists as School Psychologists will be added to current statute regarding MHCs and MFTs. The duplication of licensing authority may result in legal questions regarding the ultimate authority to issue and impose sanctions on licensees. Also, because the current scope of practice for MHCs is different than that for School Psychologists the MHC/MFT Board does not have the subject matter experts necessary to oversee School Psychologist licensing actions.

BHDDH strongly supports efforts to increase access to behavioral health services for children and youth; however, the proposed amendments to current statute that are contained in H 7335 may unintentionally result in services being provided to children and youth by professionals who will be permitted to work outside their scope of practice without receiving the proper education and training and may create conflicting licensing and certification requirements.

Thank you for the opportunity to comment on the proposed legislation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard Leclerc".

Richard Leclerc  
Director

cc: Honorable Members of the House Committee on Corporations  
Honorable Anthony J. DeSimone  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, Director of House Policy