

Mike DeWine, Governor
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MEMO

To: Superintendents, Special Education Administrators
From: Dr. Kim Monachino, Ed.D., Director of the Office for Exceptional Children
Date: April 26, 2019
Subject: Memo 2019-1: Addressing Shortages of School Psychologists

Each Child, Our Future is Ohio's shared plan for ensuring that each student is *challenged, prepared* and *empowered* for his or her future by way of an excellent prekindergarten through grade 12 (preK-12) education. Strategy one of the strategic plan addresses the importance of increasing the supply of highly effective teachers and leaders and provide supports to ensure they are effective or highly effective.

As Ohio faces a growing shortage of educators and related service providers, including school psychologists, the Ohio Department of Education has been working with partners in higher education, educational service centers, local school districts and other professional organizations to reduce the impact of this shortage. This memo serves as guidance as the state and its partners work to expand the pool of school psychology candidates. The Department anticipates that ensuring an appropriate number of licensed school psychologists are available to Ohio school districts will be a multi-year activity.

As the Department works with higher education partners to increase the pool of available school psychologists in Ohio, districts are reminded of their obligation for child find/identification and the provision of a free appropriate public education (FAPE) for students with disabilities. Trained and licensed school psychologists are preferred providers of child study practices and are qualified to guide and implement academic and behavior interventions, assessments and eligibility determinations. Nothing in the short-term solutions outlined in this memo relieves a district's responsibility for adhering to the requirements of the Individuals with Disabilities in Education Act (IDEA), Ohio Revised Code and the requirements that only a licensed school psychologist can provide, such as an individually administered intelligence test. Districts are cautioned to carefully consider and define the roles and responsibilities of personnel who are assigned to support the responsibilities traditionally fulfilled by school psychologists.

Starting immediately, there are several actions school districts can implement to allow additional flexibilities where there are shortages of school psychologists. These are designed to assess and alleviate the workload of school psychologists. These items are outlined as follows:

1. Designate administrative support staff to school psychologists. The administrative support staff will perform secretarial support, including scheduling and coordinating meetings and tracking timelines for evaluation, as required by IDEA regulations and Ohio Operating Standards for the Education of Children with Disabilities.
2. Designate a staff member as an educator *on special assignment*, in full or in part, to assist with delegated school psychology duties. Examples of individuals who may serve in this capacity include individuals who have been responsible for coordination of intervention teams and/or individuals who have training in specific areas related to the design of interventions, analysis of student performance data and progress monitoring, and administration of standardized and criterion-referenced individual student assessments. An educator with experience and specialized training in areas such as reading/literacy, behavior and social-

emotional development, special education and other areas that require individual student planning and decision-making may be best suited to work in this capacity. This individual could provide a variety of individual student assessments, interviews and case management services including, but not limited to:

- a. **Performing case management** related to child find, such as: coordination of meetings including, but not limited to, intervention, parent communication, evaluation planning and discussion of evaluation results and eligibility determinations; writing of required parent notices and letters, memos and reports regarding student data/progress; disseminating and gathering student information/data;
- b. **Assessing student academic performance/progress** via curriculum-based measurement, interviews (parents, students, school personnel), standardized achievement tests and structured observations of students;
- c. **Intervening** with students through planning and training with the school psychologist or intervention specialist (for example, academic groups, social-emotional and behavioral supports and interventions, and individual student academic interventions); and
- d. **Observing** students in the classroom regarding academic and/or behavioral concerns.

To engage in *any* of the activities listed above, the Department-licensed educator on special assignment must be sufficiently trained and properly qualified to do so. Furthermore, the educator on special assignment must be supervised by a Department-licensed special education administrator and/or a Department-licensed school psychologist.

The educator on special assignment (to assist with delegated school psychology duties) will **not** provide the following: intelligence or ability testing; assessing any student using a test that would violate the 'qualifications for use' policy by the test publisher; counseling students individually or in groups; interpreting student data other than academic achievement data; holding or participating in evaluation team meetings without the supervising school psychologist or director of special education present; transporting students in a motor vehicle; or offering independent consultation with parents or teachers without the direction or direct supervision by the current supervising school psychologist or director of special education.

In addition to its current functions, the Credential Review Board may assess experience and qualifications of candidates for Ohio educator licensure who require analysis beyond a conventional review by the Office of Educator Licensure. However, review by the Credential Review Board does not guarantee licensure. For more information, please contact the Office of Education Licensure at (877) 644-6338.

3. A Department-licensed professional pupil services provider may be assigned to fulfill the above outlined duties in full or in part.

Other areas for consideration when seeking to ensure appropriate child study practices or when trying to alleviate the workload of school psychologists include:

- Recruiting a Nationally Certified School Psychologist (NCSP) through the National Association of School Psychologists. NCSP school psychologists are eligible for licensure through the Ohio Department of Education.

Waiver of Caseload Requirements

Please be advised that districts that are temporarily unable to adhere to the caseload/workload requirements for school psychologist staffing shall apply for a waiver, pursuant to Ohio Administrative

Code 3301-51-09(K), through the Office for Exceptional Children. A waiver application will be provided upon email request to OECwaiver@education.ohio.gov. In addition to the requirements of OAC 3301-51-09(K), a district will be required to address all the following as part of the waiver application:

- How the shortage will be addressed through the addition of one or more of the options above.
- What additional clerical or case management support will be provided to reduce the workload demands on the school psychologist(s).
- How training and supervision will be provided to an educator on special assignment, school counselor or professional pupil services provider, in full or in part, to assist with designated school psychology duties.
- An assurance that practices that are considered to be protected practices only licensed school psychologists can provide will be honored.
- What the district will do to address the shortage and amount of time estimated to develop/support development of a licensed school psychologist.

Waivers will be renewable annually with documentation of recruiting and collaboration with an accredited school psychology training program. Districts may be eligible for matching funds to support the recruitment and retention of graduates to serve as interns with a multi-year obligation to work in the district.

If you have questions, please email the Ohio Department of Education's Office for Exceptional Children at exceptionalchildren@education.ohio.gov.