

September 6, 2018

Representative Ryan Smith  
District 93  
77 S. High St  
14th Floor  
Columbus, OH 43215

**Re: Ohio S.B. 255**

Dear Speaker Smith:

The International Board for Certification of Group Psychotherapists (IBCGP) writes to express our concerns about the effect of Ohio Senate Bill 255, the "Reform Occupational Licensing Act," which passed the Ohio Senate and has been introduced in the House. In its current form, SB 255 would have negative impacts on the public, on professional certification organizations, and on Ohio citizens who have earned those certifications.

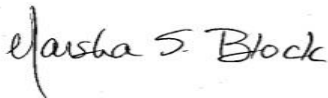
The IBCGP certifies group psychotherapists according to nationally and internationally accepted criteria and promotes these practitioners and criteria to other mental health professionals, employers, insurers, educators and clients as maintaining the highest standards for group psychotherapy practice and quality care.

The IBCGP's voluntary certification communicates to the public that certified professionals have met established standards for knowledge, skill, and competency in the field of group psychotherapy.

Voluntary professional certification protects the public from low quality or even negligent services. Unfortunately, in its current form, SB 255 calls for "state action" to "offer" governmental voluntary certification programs when there is "asymmetrical information between the seller and buyer." This is a waste of taxpayer money, given that a well-established and recognized voluntary professional certification system already exists. There is no reason for government officials, who lack subject-matter expertise, to establish programs that compete with private-sector professional certification programs.

Ohio SB 255 adopts the wrong approach to occupational licensure reform. We respectfully suggest that, as other states have done, Ohio should instead adopt legislation that allows for periodic review of licensure regulations, without presumptions that such regulations or the licensure boards should be kept or eliminated. That process would better accommodate a careful, case-by-case balancing of the State's interest in protecting the public with its interest in identifying and eliminating unwarranted barriers to entry into an occupation.

Sincerely,



Marsha S. Block, PsyD, CAE, CFRE  
CEO, American Group Psychotherapy  
Association



Tony L. Sheppard, PsyD, CGP, FAGPA  
Chairman, International Board for  
Certification of Group Psychotherapists

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