

Public Input Form for Agencies Under Review (Public/After Publication)

Name: Anonymous

Title: Licensed Specialist in School Psychology (LSSP)

Organization you are affiliated with: Texas State Board of Examiners of Psychologists (TSBEP)

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

The proposed recommendations do appear appropriate and I would support their advancement.

Any Alternative or New Recommendations on This Agency:

I would like to bring attention to a professional challenge uniquely held by Licensed Specialist in School Psychology (LSSP). In the state of Texas, LSSPs are limited to working in the public schools, unless they obtain additional licensures. This causes several significant stresses on individuals that are masters level LSSPs, and the LSSP profession as a whole.

- Because public school districts do not operate year round, an LSSPs earning potential and opportunity to work is severely limited. Many Texas school districts only offer contracts of 190-200 days; this means LSSPs are only able to generate income about 52% of the calendar year. During the other 48% of the year, LSSPs are unable to utilize their specialized knowledge, skills, degree, or license without breaking board policy by “practicing psychological services” outside of the public schools.
- Because of this severe limitation on earning potential and opportunity to work, the field continues to be an area of high need with little incentive for new members to enter the career.
- Many other professionals with equivalent education and licenses (Licensed Professional Counselors, Licensed Master Social Workers, Speech-Language Pathologists, Occupational Therapists, Physical Therapists, etc.) are able to work across settings, both in and out of the public schools. In fact, many of those professionals, as well as professionals with less training and no licensing requirements (certified/registered educational diagnosticians) are able to complete similar work to an LSSP within the public schools. When compared to certified/registered educational diagnosticians, it is contradictory for an LSSP to be considered more highly qualified and be permitted to practice in a broader capacity within the schools; however, be completely unable to work outside of the schools, where educational diagnosticians (individuals certified specifically for the school setting, by the Texas Education Agency) are fully permitted to practice.

I would like to recommend that the sunset advisory commission review current board policy and the imposed limitations on LSSPs location of practice. I would propose that the commission set forth a reasonable and justified revision to board policy that would allow masters level LSSPs to practice outside of the public schools in medical and clinical settings, completing psychological and learning assessments, under the supervision of a medical physician (MD/DO) and/or psychologist (LP/PsyD), for the purpose of data collection. Ultimately, all diagnostic identifications would be made by the supervising physician or psychologist, utilizing the data obtained by the LSSP; similar to the practice of a physician’s assistant, psychological associate, or educational diagnostician. I would also propose that the commission set forth a reasonable and justified revision to board policy that would allow masters level LSSPs to practice outside of the public schools in educational settings, completing educationally based psychological and learning assessments, independently and without any supervision requirements. This again would be similar to what is allowable practice for unlicensed, less-qualified professionals (educational diagnosticians, psychometricians, etc.).

Thank you for your thoughtful consideration in this highly important matter.