

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, December 07, 2016 11:16:03 AM

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, December 07, 2016 10:47 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Jeanette

Last Name: Arringdale

Title: Licensed Specialist in School Psychology (but also a Nationally Certified School Psychologist)

Organization you are affiliated with:

Email: jeanette.arringdale@comalisd.org

City: New Braunfels

State: Texas

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

Regarding the Sunset Commission report:

I am a LSSP in Texas. I have a master's degree with a speciality in School Psychology. I also have a certification as a Nationally Certified School Psychologist. Some LSSPs do not have this additional certification, but many do. Therefore, at this time while I may have an opinion on Issues 1, 2, and 3; I really can not have a strong position as these primarily apply to Licensed Psychologists.

Issue #1- No position

Issue #2- No position

Issue #3- No position

Issue #4- Opposed; the TSBEP should be maintained as the agency regulating the practice of psychology in Texas, including Licensed Specialists in School Psychology.

Eliminating the agency and allowing an agency that is unrelated or has no knowledge of the field would be a disservice to the profession as well as the public the profession serves. The agency does a diligent job in monitoring our profession and ensuring that we are being legal and ethical in our work and keeping those we serve from harm. TSBEP has been the governing body for a significant amount of time, all the while remaining devoted to improvement in how our profession is handled. They have very strict rules for licensure, because the profession is similar to physicians in that we hold very fragile lives in our hands. What we say and do, can literally mean life or death in some situations. We have to hold ourselves and be held accountable for judgment and actions. Allowing for more lenient licensure criteria to be met, may allow individuals to practice that are not fit or competent. It does not matter that there are not enough of us to go around. There are other ways to address that shortage; such as increasing state and federal fundings for those positions or mandating one licensed practitioner per so many individuals when it is an agency involved. These are the things only the TSBEP should be dealing with and pressing for, not some other

agency that knows nothing or little about the field.

Issue #5- Supported; the State needs to adopt a new definition of the practice of psychology as a result of the decision of the 5th Circuit Court.

While that decision was ridiculous, it was made and therefore, as a governing body TSBEP will need to address the issue.

Any Alternative or New Recommendations on This Agency:

Issue #4- Opposed; the TSBEP should be maintained as the agency regulating the practice of psychology in Texas, including Licensed Specialists in School Psychology.

New Recommendations:

-Rename licensure from "Licensed Specialist in School Psychology (LSSP)" to "School Psychologist" or Masters level School Psychologist.

Rationale: This will eliminate confusion experienced by parents, educators, consumers, and the public as to who we are and what we do. In practice, there has not been one single parent I have spoken to in all my years (13) who knows what I am when I say LSSP or Licensed Specialist in School Psychology.

Even teachers often do not know, when I have to consult with them. I have to go into a detailed explanation and say "it's like a masters level school

psychologist. Many of us are already NCSPs (National Certified School

Psychologist) already, so crossing over the Texas border I would automatically be a School Psychologist.

-Ensure proportionate Representation of LSSPs on the TSBEP

Rationale: School psychologists represent 30% of the licensees regulated by TSBEP, but presently have half of one seat on the TSBEP board.

-Allow LSSPs to practice in private schools AND

-Remove the Prohibition of LSSPs Ability to Practice in Private Clinics

Rationale: While this is currently prohibited, it will enable students in private schools to receive access to mental health services. As well as alleviate some of the shortage in the community. Currently there is the Licensed Psychological Associate, but LSSPs have just as much or more schooling, practice and competency as LPAs. In trying to get my LPA, I was turned down because I could not use my hours for my LSSP for the LPA. This should be reconsidered.

- Align State Law and Regulation for Practice to Reflect National Standards for the Practice of School Psychology

Rationale: As a matter of alignment, the state standards should be in line with the national standards.

-Ensure that LSSPs have a conferred degree in School Psychology or a Re-Specialization Certification from a School Psychology Program

Rationale: This will ensure those who seek to work with children are trained in this applied field of psychology.

My Comment Will Be Made Public: I agree