

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, December 07, 2016 9:59:43 AM

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, December 07, 2016 9:47 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Jessica

Last Name: Atkins

Title: Licensed Specialist in School Psychology

Organization you are affiliated with: Arlington ISD

Email:

City: Fort Worth

State: Texas

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

Issue 1 – TASP has no position.

Issue 2 – TASP has no position.

Issue 3 – TASP has no position.

Issue 4 – TASP opposes the staff recommendation to consolidate TSBEP. TASP maintains that Texas should continue to regulate the practice of psychology and continues to hold the position that the TSBEP should serve as the regulatory and licensing agency.

Issue 5 – TASP supports the recommendation for TSBEP to develop proposed definitions of the practice of psychology

Any Alternative or New Recommendations on This Agency:

1. Rename licensure from "Licensed Specialist in School Psychology (LSSP)" to "School Psychologist." as The National Association of School Psychologists training standards allow for the use of the title "school psychologist" for professionals who meet the NASP training standards, and those possessing the LSSP meet those standards. The title LSSP is confusing to the public and is not descriptive of who we are as professionals and the services we provide to our school systems. I continuously find parents, staff members, and students lost in the verbiage of my lengthy title, and therefore uncertain as to what it means. Therefore, I fully support TASP's recommendation that TSBEP replace all mentions of "Licensed Specialist in School Psychology" with "School Psychologist" in Chapter 501 of the Occupations Code and in the Texas Administrative Code Title 22, Part 21.

2. TSBEP board should contain a representative proportion of LSSPs.

Approximately 200 LSSP licenses are granted every year, with numbers continuing to grow. Data collected between 2007 and 2013 show that the number of LSSP licenses issued increased 24%. This compared to 19% growth in LP issuance and 0.6% decrease in LPA issuance during the same date range. Of the 48 states where board membership could be located (Iowa and Wisconsin not reporting), five states allocate a

specific seat on the board for school psychologists (West Virginia, Virginia, South Carolina, Ohio and New Mexico).

A notice of intent issued by the Louisiana State Board of Examiners of Psychologists indicates an LSSP advisory committee to the LSBEP board that includes two LSSP seats.

3. It would be beneficial for LSSPs/school psychologists to be allowed to practice in private school settings. TSBEP Rule 465.38 states, "The specialist in school psychology license permits the licensee to provide school psychological services only in Texas public schools. A person utilizing this license may not provide psychological services in any context or capacity outside of their employment or contract with public schools."

LSSPs are trained and have experience in helping all children to achieve educational success, whether in public or private school settings. This rule prohibits the LSSP from working with students in private school settings and limits the allowable services to students educated in private school settings. As a result, students in private schools are denied access to these specialized, psychological services that are afforded to students in the public school system, which, in turn, may prevent students with disabilities or social/emotional concerns from receiving needed services. This provision would give more Texas school children broader access to school-based psychological services. There are 1,750 private schools in Texas, serving 306,394 students. If approximately 10% of school-age students experience learning difficulties and educational disabilities, these schools represent more than 30,000 children who are not receiving targeted, evidence-based interventions designed by school psychologists to improve their learning experiences.

4. Remove the prohibition of LSSPs ability to practice in private clinics.

LSSPs are trained and have experience in helping all children to achieve educational success, no matter the location of the pupil. TSBEP Rule 465.38 prohibits the LSSP from working with students outside of public school settings and limits the allowable services to students accessing services in clinic and hospital settings, denying access to these specialized, psychological services that are provided to students in the public school system. Moreover, school psychologists are trained, per TSBEP Rule 463.9, in Psychological Foundations and Interventions, which are applicable across treatment settings. Only one aspect of LSSPs training, Educational Foundations, requires training specific to school settings. Additionally, TSBEP Rule 463.9 allows for 600 hours of the 1200 hour internship to be completed outside of the public school setting, provided that the "internship which is not obtained in a public school must be supervised by a licensed psychologist." According to the Department of State Health Services (2014), Texas is facing a shortage of mental health service providers. By allowing school psychologists to practice, under supervision, in clinical settings, part of this problem could be ameliorated.

5. Align State Law and Regulation for Practice to Reflect National Standards for the Practice of School Psychology. As a matter of alignment, the state standards should be in line with the national standards.

6. Ensure that LSSPs have a conferred degree in School Psychology or a Re-Specialization Certification from a School Psychology Program. This will ensure those who seek to work with children are trained in this area of practice.

My Comment Will Be Made Public: I agree