

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, November 18, 2016 8:04:49 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, November 17, 2016 2:37 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Julia

Last Name: Babcock

Title: Associate Professor

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State: Texas

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

Please reconsider any changes you may recommend to the licensing of psychologist. As a professor who trains future psychologist and as psychologist in private practice, I would recommend keeping the oral exam. Psychology is a profession that requires face-to-face interaction. It is important that qualified licensed psychologists be required to take this competency exam as it tests a candidate's ability to successfully interact with clients. Just as we interview Ph.D. applicants, we need to continue to screen in person potential psychologists who will work largely unsupervised.

Regarding eliminating the need to complete post-doctoral hours, there is a significant difference between the experience provided during the pre-doctoral internship and the post-doctoral internship. For the well-being of the client, all licensed psychologists should obtain the specific and pivotal experience that is unique to the post-doctoral internship.

Furthermore, TSBEP should be kept independent with its own dedicated staff.

Psychology is a doctoral-level profession and it take a special body of knowledge to provide guidance and consultation to the licensees. I often call TSBEP to ask specific and sensitive questions that are addressable only by qualified psychologists. TSBEP is already overburdened. Adding other professions to TSBEP to supervise the public will be impacted by not having adequate staff for their administrative functions.

Finally, I agree that the Texas Legislature adopt a new definition for the profession of psychology, however that definition must include psychologists' ability to diagnose mental illnesses. TSBEP may be unable to prosecute the unlicensed practice of psychology and could have difficulty in enforcing practice standards from individuals who claim to be practicing a particular activity which constitutes the practice of psychology. In Texas, we have a practice act and a title act. Having a practice act is necessary to create an enforceable statute that without one an individual could engage in unlicensed practice. A

practice act protects the health and safety of Texans. Psychologists diagnose in their practice and even include a diagnostic code on insurance forms. Psychiatrists who consult with psychologists ask the PSYCHOLOGIST to provide a diagnoses so they can prescribe medication. The Medicare Definition of psychologists includes the word diagnose in the definition. If the federal government recognizes these type of service then Texas should as well.

Sincerely,
Dr. Julia Babcock

Any Alternative or New Recommendations on This Agency:

I agree that the Texas Legislature adopt a new definition for the profession of psychology, however that definition must include psychologists' ability to diagnose mental illnesses. TSBEP may be unable to prosecute the unlicensed practice of psychology and could have difficulty in enforcing practice standards from individuals who claim to be practicing a particular activity which constitutes the practice of psychology. In Texas, we have a practice act and a title act. Having a practice act is necessary to create an enforceable statute that without one an individual could engage in unlicensed practice. A practice act protects the health and safety of Texans.

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My Comment Will Be Made Public: I agree