

November 29, 2016

The Honorable Larry Gonzales, Chair  
Sunset Advisory Commission  
Robert E. Johnson Bldg., 6<sup>th</sup> Floor  
1501 N. Congress Ave.  
Austin, TX 78701

Re: Texas Sunset Advisory Commission Staff Report—Texas State Board of Examiners of Psychologists

Dear Chairman Gonzales:

I would like to thank you for all of the work of the Advisory Commission in reviewing the Texas State Board of Examiners of Psychologists (TSBEP). It is obvious that much thought went into the recommendations.

I have been a practicing licensed clinical psychologist in Houston, Texas for the past twenty eight years. I would like to provide comments on some of the issues and recommendations that have been raised by the Advisory Commission. I have read the entire staff report and have the strongest feelings about the issue regarding the structure of TSBEP. I strongly believe that TSBEP should remain independent.

I feel a great deal of pride in being part of a profession with extremely high ethical and practice standards and am well aware of the fact that TSBEP has been a very strict Board. Psychology is a very complex discipline with three different types of licenses and multiple areas of specialization including clinical, counseling, industrial-organizational, and neuropsychological, among others. The level of care and complexity with which psychologists practice is most comparable to physicians, among the health care professions. The state would never consider forcing physicians or attorneys under an umbrella board. Like psychologists, their training and expertise is too specialized. In fact, all doctoral level health care professionals in Texas have their own independent agency and psychologists, as the most highly trained doctoral level mental health professionals, should be allowed to retain their independent agency (TSBEP).

According to your own report, TSBEP does not have the “key problems” of some of the other Licensing Boards you reviewed. TSBEP resolves complaints in a timely fashion, utilizes fingerprint background checks, has effective complaint prioritization, and generally has done an excellent job of protecting the public. Let’s not “fix” what isn’t broken.

Having a licensing Board with specialized and educated management staff along with the expertise of professional Board members ensures that highly qualified individuals are protecting the public. The idea of lumping doctoral level psychologists together with master’s level mental health professionals would add further to the confusion of the differences in the mental health professionals. Clearly the four extra years of training

that psychologists go through beyond the master's degree causes psychologists to have a higher level of awareness of HIPAA, state confidentiality laws, and the American Psychological Association's very high and strict ethical code and confidentiality standards. I have shared office space with master's level mental health professionals before and the level of professionalism and ethics is not the same.

In this same vein, I am not in favor of eliminating the oral exam or the post-doc year of supervision. The fifteen percent of applicants who do not pass the oral exam on the first try, fail due to difficulty managing crisis situations (for example, homicidal or suicidal patients). With life and death hanging in the balance, the oral exam and the post-doc year of supervised experience, are extra safety measures to ensure that those who become "licensed psychologists" are, in fact, very expert at dealing with crisis situations. In fact, I have worked with many physicians throughout my nearly thirty years of practice and have often specifically been referred difficult patients at risk for suicide/homicide or for non-compliance with medication or medical recommendations. These are difficult patients to deal with and demand the highest level of judgment. Plus psychologists who are completing their post-doc year are paid members of the work force, therefore contributing to access to mental health care.

In summary, I am very proud of the extremely high standards of practice for psychologists in the state of Texas. I am also very proud of the enforcement that TSBEP has provided for the profession of psychology in the state. I strongly oppose any attempt to consolidate the TSBEP under an umbrella board with risks of decreased enforcement and regulation. The people of Texas deserve to have access to HIGH QUALITY mental health care. Many patients who seek my services specifically sought out a PSYCHOLOGIST knowing we have doctoral degrees and extremely high professionalism. I hope you choose to uphold psychologists' high standards of training and retain TSBEP as an independent Board, which will protect the public and ensure provision of quality care to vulnerable Texans.

Thank you for the opportunity to provide comments on the Sunset Advisory Commission report and on the Sunset review process. Feel free to contact me if you have any questions or desire additional information.

Respectfully submitted,

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cc: Sunset Commission members