

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, December 12, 2016 3:47:43 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, December 12, 2016 3:38 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Sam

Last Name: Buser

Title: Dr.

Organization you are affiliated with: Self

Email:

City: Houston

State: Texas

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

I have previously sent a letter to each member of the Commission concerning the recommendations on the TSBEP made by the Sunset staff, and last Wednesday I testified about the TSBEP to the Commission. I wanted to provide a few further comments based on the testimony that I heard from others on that day:

1. To my knowledge virtually every state requires a post-doctoral year of supervision as part of their licensure process. If Texas were to do away with that requirement, it could severely hamper the portability of that license for those psychologists who wish to work in another state.
2. The post-doctoral year of supervision is not simply an opportunity for additional hours of experience, rather it is the culmination of a pedagogical and developmental process in which the psychologist is prepared for independent practice. Each of the experiences required of a psychology trainee (practica, pre-doctoral internship, post-doctoral supervision) is distinctive, and through that process the student is exposed to greater and greater complexity and is given increasing autonomy.
3. Much was made at the hearing by Psychological Associates that they have been unfairly treated by the TSBEP. The LPC act dates back to the 70's and essentially requires the completion of a Master's degree with a curriculum fairly similar to that of the LPA's. The vast majority of the PA's completed their Master's degree from a program where they could have chosen to become an LPC, LMFT, or LPA, and they chose the latter although they could have been independently licensed had they chosen differently. They became LPA's with the prior understanding that the license requires them to work under the supervision of a licensed psychologist. No privileges or rights were taken away from them. If they did not qualify to become an LPC by virtue of their training, then they are probably not ready to be independently licensed under our board either. The bottom line is that psychology is a doctoral - level profession, not a Master's-level one. The individuals in question can choose to meet the standards of the LPC, LMFT, Social Work, or LCDC boards--all of which are Master's-level entry professions.

Any Alternative or New Recommendations on This Agency: I am in favor of modifying the logistics of the Oral Exam so that it is more manageable. This could be done by adding additional dates of testing in other metropolitan

areas of the State.

My Comment Will Be Made Public: I agree

Sam Buser

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December 6, 2016

Re: Texas State Board of Examiners of Psychologists

I have been a licensed psychologist in Texas since 1987, and I currently practice in Houston. I serve as a staff psychologist for the Houston Fire Department, and I maintain a private practice specializing in the treatment of men. I am a former president of the Texas Psychological Association and the Houston Psychological Association.

First, I would emphasize the importance of maintaining an independent board to oversee the practice of psychology in Texas. While it might seem economical to combine the psychology board with the boards overseeing the Masters-level mental health disciplines, this would be inadequate for the protection of the public. The Masters-level mental health professions generally utilize counseling skills in a one-on-one or small group setting. While psychologists also provide counseling, we frequently engage in other activities (e.g. research, consultation, psychological testing) which are not performed by Master's level professions. For example, in the Houston Fire Department I am developing pre-employment selection procedures that require knowledge of psychological testing and research methodologies, neither of which is emphasized in Masters-level training. In addition, I am called upon to plan and implement department-wide programs to prevent suicide and to respond to mass casualty events. A board that primarily deals with issues arising in one-on-one counseling is simply unfamiliar with the practice of psychologists in roles like mine.

The second point I would like to make is for the retention of the oral examination for licensure as a psychologist in Texas. The technical knowledge required by a psychologist is reasonably measured by the Examination for Professional Practice of Psychology (EPPP), but that examination cannot measure the vital interpersonal skills critical to the practice of psychology. I have been an oral examiner numerous times, and I have taught classes on how to pass the examination. During the oral examination applicants are given a brief scenario and asked how they would respond. The oral exam gives us an opportunity to see how an applicant will perform in a realistic clinical situation. The examinees who do not pass the exam are not ready to practice independently. For example, on one occasion, an examinee was told that the client was African-American and then asked how that might affect the applicant's work with the client. Without hesitation, this applicant explained that he would loosen up his posture and start talking "jive" to the client. This applicant should not be (and was not) licensed.

I also understand that it was recommended that the Texas Legislature adopt a new definition for the practice of psychology. It is imperative that diagnosis be included in this definition. Whenever psychologists complete an insurance document or provide testimony about a person's condition, we are required to give a diagnosis. Psychologists all receive extensive training in the diagnosis of mental health conditions, and on numerous occasions I have been asked by physicians about the diagnosis of a patient so that the physician could choose the proper medications for the patient's condition.

Finally, I note that the Sunset staff has recommended that the 3500 hours of supervised experience for licensure could be obtained either through a pre-doctoral internship or postdoctoral experience. For most psychologists, these two years of training are very different experiences. For example, my pre-doctoral APA-accredited internship was at a VA Medical Center and was a rigorous academic experience, while my post-doctoral year was far more informal and conducted at a private practice. These two experiences are significantly different, and the public is far better protected if psychologists complete both.

Thank you for your time and attention and for your willingness to serve the people of Texas. If I may be of further assistance, please contact me.

Sincerely,

Sam J Buser, Ph.D., Licensed Psychologist #2-3427