

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Sunset Commission issues
Date: Wednesday, November 09, 2016 2:01:08 PM

From: BUTLER, JOHN [mailto:jbutler@kleinisd.net]
Sent: Wednesday, November 09, 2016 1:52 PM
To: Sunset Advisory Commission
Subject: Sunset Commission issues

Sunset Review staff:

I am a LSSP/Licensed Psychological Associate with a Ph.D. and over 30 years of experience in the field of school psychology. I would like to give brief feedback regarding some of your proposals and offer some other concerns of mine.

1. I agree with abolishing the full year post-doctoral supervision requirement. This is unnecessary and delays both the psychologist's ability to find immediate employment and the public's prompt access to services.
2. I support the biennial licensure proposal. I favor the reduction in fees imposed upon us, as well as the lack of need for these, which in no way improve services to the public.
3. I favor the consolidation of mental health agencies, and propose the elimination of the Texas State Board of Examiners of Psychologists as a stand-alone entity.

In addition, I am recommending the following:

4. I strongly support Master's level Psychological Associates and Licensed Specialists in School Psychology being allowed to work in private practice unsupervised by doctoral level Psychologists. Other related disciplines allow persons with Master's degrees/without licensure as doctorate level Psychologists to work unsupervised (i.e., Master's level Licensed Professional Counselor; Licensed Social Worker). Doctoral level psychologists (with support from the TSBEP) have long successfully blocked this recommendation, obviously in effort to restrict Master's level psychologists from encroaching upon their employment territory. This restrictive practice is unfair, unethical, is inconsistent with those of related disciplines, and results in fewer services that can be provided to the public. There are simply no grounds for which this practice should be allowed to continue.
5. I have been employed by public schools as a Psychological Associate and LSSP for many years. Yet my licensure prohibits me from practicing in a private school setting. There are no requirements of working in the private setting that I would be unable to fulfill with my public school experience. I have expressed this concern to the TSBEP and was simply informed that when the LSSP licensure was created, it was for persons to provide services in *public* schools (using this terminology). I don't believe there were any reasons why that should have prohibited work in a private setting – rather, it was probably simply an oversight. Nonetheless, this unfortunate rule exists, prohibiting us from offering more services to the public of which we are well qualified to provide.

I thank you very much for your consideration of the above.

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