

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, April 19, 2018 11:49:25 AM

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, April 19, 2018 11:27 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Katie

Last Name: Croft-Cadera

Title: Clinical Psychologist and Director

Organization you are affiliated with: Dallas CBT

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City: Dallas

State: Texas

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

Dear Sunset Advisory Commission,

We are a group of psychologists based in Dallas and are writing to you with sincere concern for the future of the mental health profession and the public regarding several of the recommendations put forward in the current Sunset Review (2018-2019).

We strongly oppose consolidating the 4 behavioral health boards in Texas.

Although we understand and agree with the need to better regulate the counseling, social work, and marriage and family therapy professions, combining these with the Psychology board would only serve to dilute the integrity and standards of the Psychology profession and the field as a whole. The following points support our position:

As noted in your report, the psychology board closely regulates our profession. Combining the psychology board with other boards who are in need of tighter standards and better regulation only diminishes the protection the public is offered currently from a well-functioning psychology board.

Accurate and clear representation of a clinician's training, experience, and credentialing is a right of the consumer and critical to public welfare and consumer protection. Consolidating the boards creates a lack of clarity that denies the consumer that protection.

It is unfair to the public and to us as professionals to be categorized similarly and to be governed by one board. The critical differences that warrant a separate board for doctoral-level psychologists include significantly more years of education, training, and supervised experience and more thorough training in treatment for more severe and acute psychopathology. Separate boards allows us to maintain the doctoral standard.

We oppose removing the oral exam as a competency measure for licensure, simply because the oral exam, as opposed to the EPPP, is the only true face valid board exam that we have to assess professional competency. We strongly believe that continuing to have an assessment of professional competency in some form ensures public protection across psychologists, especially given a few larger professional psychology graduate programs that are known for poorer standards of training.

Similarly, we disagree with removing the postdoctoral supervision year and provisional licensure status as a requirement for licensure. As trainers of postdoctoral residents and former postdoctoral residents ourselves, we can attest that the additional postdoctoral year of supervision is necessary for an individual to meet the professional standards and skills of being a psychologist. This additional year of supervision is a part of the standards that allows the public to trust that the level of training and experience of the clinician matches their needs. The public relies on the high standard and expectations of the psychology profession in making an informed decision on choosing a treatment provider. We argue that to loosen or diminish the psychology profession's standards in education or training gives the public less access to needed healthcare, not more.

Any Alternative or New Recommendations on This Agency: We agree with the Sunset Report recommendations to implement PsyPact, implement remedial plans for minor complaints, and clarify processes of evaluations for those suspected of being impaired.

My Comment Will Be Made Public: I agree