

# TAPA

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## Texas Association of Psychological Associates

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10 April 2018

TO: Sunset Advisory Commission

Re: Comments regarding the Staff Report of the Behavioral Health Boards for 2018-2019

From: Betty Dawson, MA, LPA with Independent Practice, Secretary, on behalf of the Officers and Board of TAPA

Sirs:

We appreciate this opportunity to support the recommendations made in this report.

Issues 1 and 2:

We strongly concur with "the Sunset Commission's recommendation to consolidate the four behavioral health boards into a single agency, the Texas Behavioral Health Executive Council..." and to implement the recommendations suggested to "bring key elements of the Behavioral Health Boards' statutes, rules and policies" into compliance with common licensing standards for all of the reasons listed in the report.

We believe the money-saving benefits to the state of combining the mental health boards are apparent, and combining these boards will increase efficiency and help bring them into compliance with best practices.

In addition, while the focus of the practitioners licensed by each of these boards is different, there are many similarities in their practices.

- There is a great deal of overlap among the scopes of practice of the practitioners with each of these licenses.

- A number of licensees hold licenses from more than one of these boards.

- While the basic education and experience requirements for entry into many of these professions are similar, there are licensees in all of them with additional degrees, increased training in specific areas, and additional qualifications, such as

professional certifications recognizing national standards or specialty areas.

- The licensees of all of these boards provide services to people, some of whom are quite vulnerable, requiring ethical standards and requirements which are very similar among these professions.

These similarities would make the inclusion of these boards a natural fit into a board such as the Texas Behavioral Health Executive Council. The Texas Association of Psychological Associates strongly supports a combined behavioral health board for all of the reasons mentioned above.

We also suggest that the newly created Behavior Analyst Board, another behavioral health board, be considered for inclusion in the Texas Behavioral Health Executive Council.

#### Issues 3 and 4:

While these recommendations do not apply to Licensed Psychological Associates, as licensees of the Psychology Board, we concur with the recommendations. We see no reason why implementing these recommendations would be detrimental to licensees or harmful to the public. Expediting the licensure of qualified candidates can only increase the provision of much needed mental health services to our citizens.

#### Issue 5:

As licensees of the Psychology Board, we also concur with the recommendation to bring "key elements of the Psychology Board's licensing and regulatory functions" into compliance with common licensing standards. The practical applications of these recommendations would appear to allow the Board to regulate the profession more effectively.

- Giving the Psychology Board the ability to lower fees would certainly be helpful to licensees and candidates for licensure.

- Allowing licensees to renew every two years would give licensees more flexibility in obtaining the required Professional Development. It would also reduce the time the Board staff must spend processing renewals and the costs of mailing renewal verification cards annually.

- We concur with the recommendations regarding the Board's enforcement actions. The Board should have the flexibility to offer remedial plans for minor violations, while focusing on those with more serious violations of Board rules. Having the authority to require physical or mental evaluations if there is probable cause of a physical or mental condition or substance abuse is important to

insuring that vulnerable clients will receive appropriate and competent services. It is also important that impaired licensees get the help that they need before being allowed to continue practicing.

#### Issue 6

Adopting the Psychology Interjurisdictional Compact would give Licensed Psychologists the ability to practice in other states for brief periods. This would allow Licensed Psychologists from other states which have adopted the Compact to practice in Texas to assist in times of natural disaster. This would benefit Texans in the affected areas.

We hope that some day the Compact will be extended to Licensed Psychological Associates and their counterparts in other states.

We appreciate this opportunity for comment. Overall we believe the recommendations made in the Staff Report to combine the behavioral health boards under the Texas Behavioral Health Executive Council will be beneficial for the state, for the profession of Psychology and for the citizens of the state. We believe that the individual recommendations for the Psychology Board will also benefit the profession, and most importantly, will make psychological services more available to the people who need them.