

Frances E. (Betty) Dawson

Dallas, Texas



**Response to the Sunset Advisory Commission's Staff Report on  
the Texas State Board of Examiners of Psychologists**

December 8, 2016

My name is Betty Dawson, and I am one of the representatives of the Texas Association of Psychological Associates (TAPA) here today. Licensed Psychological Associates (LPAs) are masters-degreed psychology practitioners, licensed by the Psychology Board.

In response to the five recommendations made in the Report by the Sunset Advisory Commission, TAPA has the following responses:

Issue 1 addresses the need for the oral exam. This does not apply to Licensed Psychological Associates, so we prefer that those who administer or take the oral exam discuss that issue.

Issue 2 applies the requirement for a year of postdoctoral supervised experience. This does not apply to Licensed Psychological Associates.

We concur with the recommendation in Issue 3 that the Board's should eliminate those requirements which are unnecessary.

We concur with the recommendation in Issue 4 that the profession of Psychology be regulated.

We concur with the recommendation that the Psychology Board rewrite the definition of psychology to comply with the legal requirements.

One of the major themes of the report was that the Psychology Board "unnecessarily limits entry into the profession." While the examples they give are important, there is a far more egregious example of the Psychology Board's unnecessarily limiting entry into the profession; it is that of Licensed Psychological Associates. While other Masters-degreed mental health professionals have the right to practice their professions, Licensed Psychological Associates do not. Since 1969 Licensed Psychological Associates have had the right to practice the full range of psychological services in all areas except private practice. Many years ago Licensed Psychological Associates were the backbone of public mental health, working with the most vulnerable populations, children and adolescents, the severely disabled, and those that were in institutions. However, over time, these services have been moved out of agencies and into the private sector. Also, private practice standards have been adopted by many third-party payment sources. Other speakers will address this further.

In private practice settings Licensed Psychological Associates must pay a percentage of their income to a Licensed Psychologist for "supervision" in order to work. Other speakers will address this further.

Rather than enhance the professional opportunities of Licensed Psychological Associates, the Psychology Board, with its predominance of Licensed Psychologists, has systematically worked to limit opportunities for Licensed Psychological Associates in favor of advantages for Licensed Psychologists. Several years ago the provision for the supervision of LPAs once their training is completed, was removed from the Psychology Act, but despite the urging of several legislators to do so, the Psychology Board has refused to remove the supervision requirement so that Licensed Psychological Associates could take jobs for which they are qualified and which would provide much needed services. Other speakers will address further the limitations that this creates.

In light of the crucial need for more mental health services, including psychological services, The Executive Summary of the report by the Sunset Advisory Commission states "Scope of practice is typically well-outside the purview of a Sunset review..." We are not asking you to address scope of practice. Our scope of practice will not change. We are asking that you enable Licensed Psychological Associates to provide the services in the private sector which they had provided in the public sector, and for which they are trained, without having to pay a Licensed Psychologist to do so.

We are asking to provide many of the mental health services which are so crucially needed.

We are asking for the right to provide psychological services to those who need them no matter in what setting and in what part of the state, without being tied to locations where there are Licensed Psychologists.

We are asking for fair treatment by the Psychology Board.

We are asking for the right to compete in the market place with other Masters-degreed mental health professionals.

**These are our recommendations:**

1) Bring the Psychology Board into conformity with the other mental health licensing boards who recognize that practitioners with either a Masters degree or a Doctorate have the ability to practice without supervision.

2) Restructure the make-up of the Psychology Board to better represent the licensees of the Board to include 2 Licensed Psychologists, 2 Licensed Psychological Associates, 2 Licensed Specialists in School Psychology, and 3 Public Members. We would also recommend that the 2 Licensed Specialists in School Psychology are not dually licensed, but only work in school psychology settings.

3) Whether or not the Psychology Board is left as a free-standing agency or moved under the Texas Department of Licensing and Regulation, we ask that Licensed Psychological Associates be treated fairly and with as much support to succeed in their profession as is given to Licensed Psychologists.

No matter the definition, we want to be able to practice Psychology, the profession for which we were trained, to assist in addressing the mental health crisis in Texas.

## Texas Association of Psychological Associates

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P.O. Box 601374, Dallas, Texas 75360-1374  
txapa@att.net ★ www.txapa.net

15 November 2016

TO: Mr. Robert Romig  
Ms. Julie Davis  
Mr. Joe Walraven  
  
Texas Sunset Advisory Commission  
P.O. Box 1306  
Austin, Texas 78711

RE: Response to the *Staff Report: Texas State Board of Examiners of Psychologists*

Dear Mr. Romig, Ms. Davis, Mr. Walraven and members of the Sunset staff,

On behalf of the Texas Association of Psychological Associates, thank you for your time and interest during the Sunset Review of the Psychology Board. We read your report with interest, and look forward to reading your report of the benefits of consolidation.

In response to the Issues listed in the *Staff Report: Texas State Board of Examiners of Psychologists*, TAPA offers the following response:

Issues 1 and 2 do not directly apply to our membership, so the Texas Association of Psychological Associates has no need to comment.

Issue 3 pertains to administrative operations of the Board, so the Texas Association of Psychological Associates has no need to comment.

Regarding Issue 4 and a plan for consolidation, the Texas Association of Psychological Associates will comment further following our analysis of the *Sunset Advisory Commission Staff Report on the Health Licensing Consolidation Project* and any impact it might have on Licensed Psychological Associates.

Regarding Issue 5, members of the Texas Association of Psychological Associates have participated in drafting a new definition of psychology, and we may have additional comments once the most recent draft is made public.

As the process progresses, the Texas Association of Psychological Associates will be addressing the limitations of the Board's unnecessary restrictions, as they apply to Licensed Psychological Associates, which contribute to the shortage of mental health care providers in Texas.

The Texas Association of Psychological Associates again wishes to extend our appreciation for your time and effort in the Sunset Review process. We look forward to the opportunities that this process provides to ensure the efficient delivery and the quality of psychological services for all Texans.