

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Sunset Review TSBE
Date: Wednesday, December 07, 2016 1:26:48 PM

From:
Sent: Wednesday, December 07, 2016 1:13 PM
To: Sunset Advisory Commission
Subject: Sunset Review TSBE

As a licensed psychologist practicing in Dallas for more than 30 years, I'd like to offer some input on the upcoming Sunset Commission Review. Please take my views into consideration as you meet tomorrow:

ISSUE: POST-DOC HOURS

Please do not weaken the requirement regarding post-doctoral hours, allowing pre-doctoral hours to take the place of the current post-doc required 3500 hours of supervised experience. This is like allowing apples to substitute for oranges, since the experiences in these two requirements offer a qualitatively different type of practice in many cases. My predoctoral hours were at the VAMC, which was significantly different from the community setting in which I found postdoctoral employment. Without that post-doc experience requirement, I would have been floundering with clients because the setting was so different. This could represent a risk to the public.

ISSUE: TSBE: TEXAS STATE BOARD OF EXAMINERS OF PSYCHOLOGY

TSBE should be kept independent with its own dedicated staff. As a doctoral-level profession, administration of the practice of psychology takes a special body of knowledge to provide guidance and consultation to the licensees. PLEASE KEEP OUR INDEPENDENT BOARD.

ISSUE: NEW DEFINITION OF PSYCHOLOGY

I agree a new definition for psychology is needed and Texas Psychological Association will work with the state Legislature to adopt a new definition. However, to accurately reflect the nature of a psychologist's practice, the new definition should include the ability to diagnose. Not having this ability included as part of the definition of psychology represents a potential risk to the public, if the practice of psychology is not specifically spelled out. The unlicensed practice of psychology could be difficult to enforce without a PRACTICE ACT. Having a practice act is necessary to create an enforceable statute that without one an individual could engage in unlicensed practice.

- A practice act protects the health and safety of Texans.
- Psychologists diagnose in their practice and even include a diagnostic

code on insurance forms.

- Psychiatrists who consult with psychologists ask the PSYCHOLOGIST to provide a diagnoses so they can prescribe medication.
- The Medicare Definition of psychologists includes the word diagnose in the definition. If the federal government recognizes these type of service then Texas should as well.

THANK YOU FOR HEEDING MY CONCERNS WHEN YOU MEET
TOMORROW.

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