

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, April 26, 2018 8:08:10 AM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, April 25, 2018 11:08 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Rowland

Last Name: Folensbee

Title: Psychologist

Organization you are affiliated with: Private Practice

Email:

City: Shavano Park

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:  
April 25, 2018

Dear Sunset Commission:

I attended the Sunset Commission hearing today and have several things to add.

First, many thanks to Senator Birdwell and Representative Paddie, as well as the rest of the commission, for running a very efficient, very respectful hearing.

- The significant differences between psychology and the other three professions were not made clear in today's testimony. Psychology is much different because:
  - o It is focused much more on incorporating research into assessment and treatment related to cognition, personality, and the brain, rather than just focusing on counseling intervention strategies.
  - o It has multiple related but discrete sub-areas focused on specific knowledge about human functioning: neuropsychology, industrial-organizational psychology, forensic psychology, experimental research, psychological assessment, school psychology.
- Social workers, licensed professional counselors, and marriage and family therapists are extremely similar to each other because the primary emphasis of each profession is counseling interventions. Psychology is much different from the other three due to the differences identified in the previous bullet point.

- Incorporating TSBEP under BHEC will diminish the effectiveness of TSBEP because administrative and staffing decisions will be managed by BHEC rather than TSBEP. This will make staff much less responsive to the complex needs of psychology, which are very different from the counseling-focused needs of the other three professions.
- Moving staff from the other three boards to TSBEP to meet workforce needs will be disruptive because of the many and extreme differences in the professional tasks required of psychology and the other three professions. Moving staff from one of the other three boards to another will work effectively because their tasks are so similar across the three professions.
- Ethical considerations are different between psychology and the other three boards due to the differences in foundation of knowledge and difference in mission, so attempting to use the same staff to work on ethical issues in TSBEP and the other three boards will increase the risk of mistakes in carrying out ethics determinations and related tasks.
- More must be expected of professionals who have received in-depth training required for a doctorate in psychology. If staff shift from one board to another, mistakes will occur that disrupt the functioning of the board and result in mistakes that hurt citizens of Texas.
- Senator Birdwell suggested having the psychology board be comprised of one more lay member than professional member as a way to resolve the issue that the board may serve the professionals rather than the public. This or a similar resolution can eliminate the concerns raised by the North Carolina restriction of trade issue while allowing the psychology board to function as an independent entity.

Thank you for your work and your consideration.

Rowland Folensbee, Ph.D.,  
Licensed Psychologist, Texas License #2-3234 Licensed Special in School Psychology #6169

Any Alternative or New Recommendations on This Agency: BHEC professional board members should vote.

My Comment Will Be Made Public: I agree

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APR 25 2018

April 24, 2018

RE: Recommendations for Sunset Commission 2019  
Texas State Board of Examiners of Psychologists (TSBEP)

Dear Sunset Commission Member,

First, thank you for your time, energy, and thoughts as you consider what will be best for Texans regarding TSBEP.

I have been a Licensed Clinical Psychologist in Texas for the past 31 years. For the five years ending in July, 2017, I served twice a year as a volunteer examiner for the TSBEP oral boards.

I am offering my observations and recommendations regarding how best to manage the licensing and supervision of psychologist over the next twelve years.

Fighting a turf battle is something I do not want to do! My own observations based on my experiences as a psychologist tell me that TSBEP will continue its excellent job screening and supervising psychologists ONLY if it remains independent of the proposed Texas Behavioral Health Executive Council and the social workers, licensed professional counselors, and licensed marriage and family therapists it will subsume.

But that is a Turf War comment!

I have found a different foundation for my perceptions. Rather than relying on my own views, I interviewed my colleagues who are Licensed Clinical Social Workers, Licensed Marriage and Family Therapists, and Licensed Professional Counselors.

They all agreed. The response of one colleague, a professional with forty years' experience who is credentialed as a LCSW, LPC, LMFT, captured the reactions of them all. That reaction could be described as 'Aghast and Appalled' at the idea that psychology would be combined under an overarching Behavioral Health Executive Council with the other three professions.

My masters level colleagues clearly made the following points:

- **Psychologists' training is so much more complex** that the members of a supervisory board would have to be knowledgeable regarding extremely different sets of professional demands and training if psychology were to be included with the other three groups under the Behavioral Health Executive Council (BHEC). The colleague clearly stated the expectations for the other three professions are practically synonymous with each other. Supervising all four professions together would be impossibly complex.

- It is incredibly unlikely members of a supervising board could have adequate understanding of **the effects of the scientific empirical basis of psychological training** in contrast with the basic, practical, communication-type training of the other three professional groups. Staff's expectations of either psychologists or the other three groups of professionals would likely be inappropriate.
- The higher standard of training demands a **much more rigorous and diverse set of professional ethical expectations** for psychologists than for the other three groups, and simultaneously overseeing such a diverse set of expectations would regularly lead to lapses in judgment for staff of an agency overseeing all four groups.
- Even though masters level practitioners have the privilege and responsibility of diagnosis, my masters level colleague said he regularly seeks out psychologists to assist with diagnosis of more complex cases, demonstrating the difficulty of managing the **different standards of competency and responsibility** required of psychologists vis-à-vis the other three groups.
- He recognized the **variety of specific areas of in-depth training** psychologists receive, including **neuropsychology, formal psychological diagnosis, industrial organizational psychology, school psychology, and research psychology**. He pointed out these areas are far removed from the almost synonymous similarity between the procedures and training demands of LCSWs, LMFTs, and LPCs, making simultaneous decision-making by the same supervisory board untenable.
- I am uncomfortable claiming this final point, but he pointed out **those screened INTO training to be Doctoral psychologists are the cream of the crop intellectually and academically**, so it would be incredibly difficult for a supervisory board to maintain awareness of the differences in complexity of thought and understanding demanded of psychologists contrasted with the other masters level mental health professionals.

My final point is separate from my conversations with masters level professionals. A primary rationale for a unified lay board is to protect against legal claims of professional influence on a board influenced too much by the professionals they supervise. TSBEP has already done away with the primary potential claim represented in the North Carolina case: that masters level practitioners will be blocked from independent professional practice. That change instituted by TSBEP last year is itself a **powerful legal argument that the current state board is not a rubber stamp for professional doctoral level psychologists**, thereby protecting an independent TSBEP from the type of lawsuit that has generated such fear.

The views of masters level practitioners of the differences between psychology and the three masters level professions strongly oppose combining psychology under BHEC with the other three professions. That combination is seen as a recipe for disaster. Furthermore, TSBEP has eliminated the need to independently affirm with such an integrated supervisory agency the fact that professional psychology's will is not being served by the board by which it is supervised. **The merger of TSBEP with the other three boards under a unifying agency is then likely to be both disastrous and useless.**

Thank you.



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