

**From:** [Sunset Advisory Commission](#)  
**To:** [Cecelia Hartley](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, December 08, 2016 12:30:44 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, December 08, 2016 9:47 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Sarah

Last Name: Fox

Title: LSSP

Organization you are affiliated with: NISD

Email:

City: San Antonio

State: Texas

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

I am opposed to the consolidation of TSBEP under TDLR. TSBEP ensures the safety of the public through regulation of the practice of psychology within the state of Texas by competent, qualified professionals; including the Licensed Psychologist, Licensed Psychological Associate, and Licensed Specialist in School Psychology.

The potential impact of the provision of psychological services is life changing and these services should be directly regulated and rules enforced by those with specialized knowledge and experience. The consolidation of the agency under a large regulatory mechanism would likely impair these processes.

Any Alternative or New Recommendations on This Agency:

1) Allow Licensed Specialists in School Psychology to practice in all educational settings.

This provision would give more Texas school children broader access to school-based psychological services. There are 1,750 private schools in Texas, serving 306,394 students. If approximately 10% of school-age students experience learning difficulties and educational disabilities, these schools represent more than 30,000 children who are not receiving targeted, evidence-based interventions designed by school psychologists to improve their learning experiences.

2) Rename licensure from "Licensed Specialist in School Psychology (LSSP)" to "School Psychologist".

This will eliminate confusion experienced by parents, educators, consumers, and the public and will establish consistency with other statutory and regulatory language that require the practice of school psychology to conform to national standards of practice.

3) 2. Ensure proportionate Representation of LSSPs on the TSBEP School psychologists (LSSPs) represent 30% of

the licensees regulated by TSBEP, but only have half of one seat on the TSBEP board.

The TSBEP should reflect the professionals whom they regulate. This would simplify regulation and enforcement activities by ensuring that those most knowledgeable about the various types of psychology practice are included in protecting the public.

My Comment Will Be Made Public: I agree