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Response to the Sunset Advisory Commission's Staff Report on the Texas State  
Board of Examiners of Psychologists  
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My name is Claudia Ghio, and I am a Licensed Psychological Associate (LPA).

The report of the Sunset Advisory Commission states that the provision of active oversight by the Texas Department of Licenses and Registration (TDLR) will help "prevent rules that create unreasonable restraint of trade" which may constitute anti-trust violations and in turn possible litigation.

The LPAs are in agreement with such recommendation because at the present, the Psychology Board unreasonably and uncompromisingly maintains two rules that affect the ability of the Masters in Psychology to exercise our trade: the rule of supervision for life and the artificially lowered educational requirements to obtain a license as LPA.

The latter rule supports the former. Every time we request parity with other master level mental health professionals to work independently, the Board or the Texas Psychological Association (TPA) bring to the attention of the legislators that we are only required 42 semester credit hours and 450 hours of practicum and these are not sufficient to release our license from supervision. These requirements are true but what it is not true is that they do not correspond to reality.

The majority of the terminal master programs in the state require 60 or more credit hours and many require 1200 hours of practicum. We, the LPAs have repeatedly petitioned the Board to increase the educational requirements to at least 60 credit hours and at least 1200 hours of practicum to match what is already in programs offered, but as many times we have requested, as many times the Board has refused us.

No Board of professionals will want its' members to be undereducated. The reason the Board has refused to increase our educational requirements to match reality is so they can keep using it to keep us from working without supervision. This rule has been used against us repeatedly, thus creating an "unreasonable restraint of trade."

The Board has not only used those two rules against us, but against their main responsibility: the people of Texas. We, the LPAs have the training that in many ways is often more based in the science of psychology than other master level mental health professionals. Our scope of practice is the same as the Licensed Psychologists (LP), we can immediately fill the gaps in the mental health crises, at a lower cost to the public, at no cost for the state because there are 1100 of us ready to work. There will be improved access to care especially in underserved areas, and there will be greater consumer choice.

It is not our concern where the Psychology Board resides, wherever that is, we ask that the Licensed Psychological Associates be treated fairly and reasonably in parity with other master level mental health professionals.