

Dear Senator Birdwell

Thank you for the opportunity to present this perspective on the proposed changes to the Texas Board of Examiners of Psychologists (TSBEP) which is under review by the Sunset Commission of the Texas Legislature.

I strongly urge you to OPPOSE the consolidation of the TSBEP into the BHEC.

- By its own report, the TSBEP already functions well. The proposed changes will only make it less effective in its role of Protecting the Public. The Sunset Commission staff also acknowledged this in the legislative hearing on April 25, stating that it might be two years before the new agency worked well. Does the Sunset staff have a new saying- “If it ain’t broke- dismantle it”?
- Despite the claims of the three other mental health boards, there **are real differences** in the Professional responsibilities of Licensed Psychologists:
 - At one time I was a Licensed Professional Counselor (LPC).
 - I was also dually licensed as a Licensed Marriage and Family Therapist (LMFT).
 - I have worked closely with Clinical Social Workers in a variety of settings.
 - I fully appreciate and encourage the work of all three of these licensed professions.
 - **After being licensed** as an LPC and LMFT- I was admitted to a doctoral psychology program which included:
 - Three additional years of coursework on pathology, counseling and research
 - Highly supervised specialty settings including individual therapy, neuropsychology evaluations, and geropsychology.
 - Original research on staff stress.
 - A full year of supervised work experience in the Houston Veterans Hospital.
 - An additional full year of supervised work experience- the Post doctorate year- at the Austin State Hospital.
 - After receiving the doctorate, passing the written exam and the oral exam, and the Postdoctoral Year, I received my license as a Psychologist. Since then I have also taken specialty training in
 - Psychopharmacology
 - Forensic Evaluation
 - Behavior Analysis (Board Certified Behavior Analyst- BCBA)
 - Since then I have worked on locked geropsychiatry units, long-term care facilities, and the forensic residential facility for persons with intellectual disabilities. I do professional presentations on dementia, aging, intellectual disabilities, and forensic practices. I am a member of a national organization developing policy and standards for older adults with intellectual disabilities. I also provide assistance to the Disaster Mental Health of the Red Cross and have worked with victims of flooding, fire, the West explosion, and the Las Vegas mass shooting. And as a Licensed Psychologist, I’m not that unusual.

- I recently conducted a forensic evaluation for competency to stand trial on a patient who was also having serious neurological issues. I was able to use a variety of methods to evaluate this patient to provide a baseline of his current intellectual functioning in reference to his competency to stand trial as well as a basis to measure future declines in his functional capabilities. A medication issue was also a critical component of the charges against this patient and was an important consideration in his case.
 - In the rosy picture portrayed by the sunset report to the Commission, the staff of a consolidated board would NOT be specialized- but “would help out each other” when big work loads came in-
 - So- If a question came up in the case I briefly outlined above- which non-specialized consolidated staff member who was accidentally available would you trust to handle the issue? The LMFT staff on duty that day on a question of if I properly applied the appropriate methodology on the third standard for competency to stand trial in TPC 46B?
- There are a lot of other Licensed Psychologists who have a variety of specialties including Industrial-Organizational, Educational, Behavioral Analysis, and Medical, along with Forensic, Neuropsychological, Workers Comp, and Intellectual Disabilities.
 - The idea that we are all pretty much alike just does not hold up. A consolidated board with the master’s level licensees might work for them. It would not work for Licensed Psychologists with so many other specializations.

Please add me to the record- I was at the legislative hearing on 04/25/2018 and filled out a white legislative registration card to indicate my position- but was not included in the official record at the end of the meeting. I don’t know why I was not mentioned with the other Licensed Psychologists who were there. Like the thirty plus others, I came specifically to testify to the Commission. But at the last minute-we were told we could not testify- the limit was five people.

- Coming to Austin is a chore. I gave up nearly two days to drive to Austin, pay for a motel, be at the Capital in Austin traffic in time to register for the Commission, listen to the agencies report, etc. I was willing to do this for my THREE MINUTES- AND I DID NOT EVEN GET THAT..

However- a couple of points were discussed that merit further consideration:

- Economy of Scale: There is no guarantee that a consolidate commission of four separate boards would be any more economical. Or functional. The best model is one specialized board for each. Sharing staff between boards might sound good on paper, but in real life you share the risk – to the public- of an LPC staff member going astray on an LMFT issue. (I was both at one time). Or a Forensic issue with a patient with possible dementia. It is readily apparent that the titanic Economy of Scale already seen in HHS is not working.

- The BHEC would be another agency anyway. While there is a current push to have fewer agencies, if a new one is called for to better protect Texas- just do it- join together the three master's level professions and see if it works. Don't dismantle a working agency as an experiment.
- Other states that have tried consolidated board have abandoned them.
- One person discussed the issues of persons with Intellectual Disabilities. There are a number of Licensed Psychologists in Texas with this population as a specialty. More are needed. This is an important issue for HHS also.
- One person discussed her complaint about having 60 hours and not being called a School Psychologist. Sitting two rows behind her was a Licensed Doctoral Level Psychologist who received her degree- 120 plus hours- in School Psychology.
- Any one of us who were there to testify on this issue would readily remind the Sunset Commission of the appropriate role of the licensing boards- to protect the public. Any short-cut for efficiency or political gain that diverges from this primary mission should be Red-Flagged, Tagged, and dismantled by the Sunset Commission.
- When I received the various degrees from colleges, I did not ask them to lower their standards so that I could graduate. When I was licensed as a Social Psychotherapist, and later as an LPC, and an LFMT, I did not ask the state to lower its requirements so that I could receive a license. When I was licensed as a Psychologist, I did not ask the state to lower its standards for me. I stepped up and met the requirements. So- it is difficult to understand the current trend toward lowered standards in view of the mission of the state's commissions and boards to protect the public.

Submitted to the Texas State Sunset Commission: 04/29/2018

Andrew W. Griffin, Ph.D.

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 30, 2018 7:57:02 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, April 30, 2018 1:29 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: ANDREW

Last Name: GRIFFIN

Title: PHD

Organization you are affiliated with: TEXAS PSYCHOLOGICAL ASSOCIATION

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

STRONGLY OPPOSE CONSOLIDATION OF TSBEP INTO BHEC.

There is no guarantee that "Economy of Scale" would actually be found.

Doctoral Level Psychologists have very many specialty areas- very difficult for a consolidated board with so many other responsibilities- leaves protection of the public at risk.

Any Alternative or New Recommendations on This Agency: **LEAVE TSBEP INTACT AND WORKABLE.**

My Comment Will Be Made Public: I agree