



Texas Psychological Association

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Mr. Ken Levine, Director
Sunset Advisory Commission
PO Box 13066
Austin, Texas 78711

Comments to the Sunset Staff Report for the Texas State Board of Examiners of Psychologists

Mr. Levine:

On behalf of the Texas Psychological Association, I want to thank you, your staff, and especially Mr. Robert Romig for the time and effort you have spent reviewing the Texas State Board of Examiners of Psychologists. Please know how much we appreciate your openness and willingness to hear our thoughts regarding this incredibly important agency. We really do appreciate Mr. Romig taking the time to visit with us twice before his recommendations were published. He was always professional, thoughtful, courteous, and generous with his time.

As we mentioned in both of our meetings with Mr. Romig, and as many of our members will testify to during the upcoming Sunset Commission hearing, the Texas Psychological Association adamantly opposes consolidation. Last legislative session, the Sunset bill that included consolidation failed to pass the legislature. We visited with many house and senate members who agreed with our association that consolidation was not in the best interest of Texans with mental health needs. Consolidation could irreparably harm so much of the progress policy makers have made in the area of mental health. That is an unnecessary risk.

The Sunset Staff Report for the Texas State Board of Examiners of Psychologists contains many conclusions with which we wholeheartedly agree. For example, the report states that “the independent psychology board is a well-functioning agency.” We could not agree more. Our governing agency functions exceptionally well. Given the fact that the Sunset Commission concluded that our agency functioned extremely well, why should the legislature try and fix something that clearly is not broken?

The report also states that “the stand-alone psychology board offers a proven foundation that effectively regulates a closely-related behavioral health profession.” Again, we completely agree with this conclusion. Our governing agency and our profession should not be punished via consolidation for doing an excellent job. We respectfully request, based on the Sunset staff conclusions referenced above, that Texas State Board of Examiners of Psychologists be kept intact as an independent governing board so it can continue to do the excellent work it is currently doing. We do not believe we should be punished for the problems of other boards.



While consolidation is the most important issue our association addressed in the Sunset report, there are also other issues where we have concerns. The Sunset Report recommended eliminating the authority for the psychology board to administer an oral exam. We disagree with this proposal and instead suggest that the structure of the oral exam be changed rather than eliminated. Instead of the oral exam being conducted twice a year in Austin, we would suggest it be conducted throughout the state multiple times a year so that more psychologists can volunteer to participate. We believe this exam is a critical component of becoming licensed and should therefore be maintained as a requirement.

The Sunset Report also recommended removing the requirement for psychologists to earn half of their supervised work experience after receiving their Ph.D. We disagree with this recommendation and hope the Sunset Commission will recommend reinstating it. Removing the post-doctoral supervision hours will eliminate reciprocity with the 32 states that continue to require it. This would deter psychologists from moving to Texas from those states and ultimately have a deleterious effect on the mental health provider resources within the state. The post-doctoral fellowship is an essential aspect of training for independent practice and licensure as a psychologist. Just as we expect and require physicians to complete a medical residency after their doctoral training, a similar standard should be applied to psychologists.

Lastly, we agree with the Sunset Report recommendations to implement PsyPact, eliminate the need for a separate application process for provisional licensees, use remedial plans for minor complaints, and clarify the authority to require evaluations of those who are suspected of being impaired and hold hearings for noncompliance.

Again, we really appreciate the time and effort you, Mr. Romig, and your entire staff have put into this report. We look forward to continuing our discussions with you, the Sunset Commission members, and the members of the legislature, to craft public policy that best serves the mental health needs of all Texans.

Thank you for your consideration,

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Psychologist
2018 President
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