

Jean Karoly

**Written testimony of Jean Karoly, Psy.D. for the Sunset Advisory  
Commission meeting on 12/8/2016**

My name is Jean Karoly and I am a Licensed Psychologist and a Licensed Specialist in School Psychology (LSSP)

I wanted to address the issue of consolidation. One of the reasons listed as an argument for consolidation is that the TSBEP has a great deal of work on its plate. However, if some of your other proposals are adopted: for example:

1. if the oral exam is eliminated,
2. If the Provisional Psychologist's licensure is eliminated,
3. if the Post Doc supervisory year is eliminated,
4. and if the board provides some non disciplinary sanctions for minor matters (instead of a full investigation that often lasts up to 11 months),

Then, an enormous amount of the board's work will be eliminated, and the staff should be easily able to handle the workload.

The problem with consolidation is that the overriding agency will have a burdensome amount of work overseeing several mental health providers with different ethics codes and different rules.

The current Texas State Board of Examiners of Psychologists alone has four different types of licensures (three if they eliminate the Provisionally Licensed Psychologist). In addition to these separate licensures with the TSBEP, a consolidated board will be overseeing

The Married and Family Therapists, The Professional Counselors, the Social Workers, and who knows who else?

With so many different professions with different codes of ethics, I think the consolidation of these professions will be unwieldy and will result in no competent oversight of these professions and therefore no decent accountability.

I can anticipate that merely calling a consolidated board and reaching the right staff person for a particular license will result in a great deal of confusion.

In fact my speech therapist colleagues are already complaining about the unclear procedures and the difficulty getting feedback from their consolidated board.

In addition, I would like to raise the issues of the LSSPs being allowed to practice in private schools. By the current rules, they cannot. Therefore, a large number of private students with disabilities do not have access to the services of the very people who are highly trained and most qualified to assess for special education disabilities and recommend services for these students.

I also suggest that LSSPs be allowed to conduct private evaluations under the supervision of a psychologist. As a licensed psychologist and an LSSP, I have supervised LSSPs and LPAs. I have found the LSSPs to be just as knowledgeable as LPAs about test interpretation and diagnostic issues.

If you allow LSSPs to conduct private evaluations under supervision, a great deal of the inaccessibility of mental health services for the public will be ameliorated.

Finally, I suggest you consider that the name of the LSSP (Licensed Specialist in School Psychology) be changed to Licensed School Psychologist.

Parents are confused by the name, LSSP, and it would save a lot of time and explanation if the LSSP could refer to himself/herself as the School Psychologist.

I know the Sunset Commission did not address any issues related to subdoctoral licensees but I think we should consider their needs since they make up 43% of the TSBEP licensees and are the ones doing the "heavy lifting" when providing psychological services.

Thank you so much for listening to my comments.

Dear Sir:

I have read carefully your recommendations for the Sunset Review. I agree with all of the recommendations with the exception of considering a consolidation of the Texas State Board of Examiners of Psychologists. It is true that there is a great deal of work the board is doing. However, if the oral exam is eliminated, if the Provisional Psychologist's licensure is eliminated, if the Post Doc supervisory year is eliminated, and if the board provides some nondisciplinary sanctions for minor matters (instead of a full investigation that often lasts up to 11 months), an enormous amount of the board's work will be eliminated. The problem with consolidation is that the overriding agency will have a burdensome amount of work overseeing several mental health providers with different ethics codes and different rules. I can see a great deal of confusion arising out of such consolidation.

In addition, I would like to raise the issues of the LSSPs being allowed to practice in private schools. By the current rules, they cannot. Therefore, a large number of private students with disabilities do not have access to the services of the very people who are highly trained and most qualified to assess for disabilities and recommend services for these students. LSSPs should also be allowed to conduct private evaluations under the supervision of a psychologist. As a licensed psychologist and an LSSP, I have supervised LSSPs and LPAs. I have found the LSSPs to be more knowledgeable about test interpretation and diagnostic issues than are the LPAs. If you allow LSSPs to conduct private evaluations under supervision, a great deal of the inaccessibility of mental health services for the public will be ameliorated.

Finally, I suggest you consider that the name of the LSSP (Licensed Specialist in School Psychology) be changed to Licensed School Psychologist. Parents are confused by the name, LSSP, and it would save a lot of time and explanation if the LSSP could refer to himself/herself as the School Psychologist. I realize this is a touchy issue with the Texas Psychological Association and TSBEP, but the use of the word "psychologist" appears to be a pecking order issue, rather than a competency issue since many subdoctoral licensees provide "psychological services."

I know the Sunset Commission has invested many hours into this work. I know this has been a very difficult job for every member of the commission, so your efforts are appreciated. I just thought you may want to consider some important issues for subdoctoral providers, as they often do the heavy lifting when providing services.