

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Sunset Review of the Texas State Board of Examiners of Psychologists
Date: Wednesday, November 16, 2016 8:14:28 AM

From: Lance Kelley PH.D [mailto:lkkelley@wacofhc.org]
Sent: Tuesday, November 15, 2016 10:56 PM
To: Sunset Advisory Commission
Subject: Sunset Review of the Texas State Board of Examiners of Psychologists

Dear Sunset Advisory Commission,

Thank you for your work on the Texas Sunset Advisory Commission. I am writing to you with regard to concerns noted in the Sunset Staff Report on the Texas State Board of Examiners of Psychologists.

First, quality mental health training is essential to provision of quality mental health care, and the requirement for postdoctoral training is essential to maintain the quality of psychologists in Texas. In contrast to predoctoral training, post-doctoral training is typically more advanced and prepares the future psychologist for practice with a particular population with specific treatment modalities. Postdoctoral fellowships range broadly: neuropsychology to clinical health psychology, from forensic psychology to school psychology. I completed a postdoctoral fellowship in clinical health psychology, which has allowed me to competently serve as the sole psychologist for a community health center that serves almost 50,000 underserved patients in Central Texas.

Second, as a new definition of Psychological practice is developed, it is essential that the definition include diagnosis as a part of psychological practice. From very early in their training, Psychologists learn about diagnosing mental disorders in addition to psychological testing, psychotherapy, interpreting behavioral science research, and neuropsychology. Clinical Psychologists are widely regarded as excellent diagnosticians and are frequently consulted by psychiatrists to render a precise diagnosis. My practice includes referrals from dozens of physicians each requesting “diagnostic clarification by a Clinical Psychologist.” Moreover, the Diagnostic and Statistical Manual of Mental Disorders-5, created in 2013, is considered the gold standard for diagnosing mental disorders and utilized more than 40 psychologists in the highly selective task force and on workgroups. Thus, psychologists are considered not only experts in using a classification system but were sought out to help create the very classification system now commonly used to diagnose mental disorders.

Third, please consider retaining the oral exam, as it is critical to maintaining clinical psychology as a discipline of experts in human interaction and behavior. The examination requires significant preparation and is widely regarded as one of the appropriate developmental milestones in the training of a Clinical Psychologist. The oral examination is a needed check to ensure an applicant possesses the requisite interpersonal skills and active problem solving ability to serve the public as a Clinical Psychologist.

Finally, an independent licensing board is critical to protect the discipline of Clinical Psychology. Clinical Psychology programs, as with other fields that produce experts, are highly selective. For example, the clinical psychology PhD programs at the University of

Texas-Austin and Texas A&M have average admission rates of less than 4% per year, a selection rate on par with the most competitive medical and law schools in the country. Moreover, clinical psychology PhD programs are arduous, as average time to degree is close to 7 years. Through this rigorous and competitive process Psychologists have earned the distinction of expert in their field. Experts in other fields practicing in Texas have independent boards. Physicians in Texas have practice regulations and protections dictated by an independent board, the Texas Medical Board. Attorneys practice law within the regulations and protections afforded by the State Bar of Texas. Accordingly, Psychologists, as experts in the field of Psychology, should be governed by an independent board.

Again, thank you for dedication to public service and the people of Texas. I hope you will consider adjusting the Sunset Report so that we may promote the highest quality of care for our citizens.

Sincerely,

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