

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, November 30, 2016 8:06:48 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, November 29, 2016 7:26 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Laurie

Last Name: Klose

Title: Assistant Professor and Director, School Psychology Program, Trinity University

Organization you are affiliated with:

Email:

City: San Antonio

State: Texas

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

I am opposed to the consolidation of TSBEP under TDLR. TSBEP ensures the safety of the public through regulation of the practice of psychology within the state of Texas by competent, qualified professionals; including the Licensed Psychologist, Licensed Psychological Associate, and Licensed Specialist in School Psychology. The composition of the board includes four LPs, two LPAs and three public members who are appointed by the Governor for six year terms. One of the LP or LPAs appointed to the board must also be a practicing LSSP. These appointed board members ensure public safety through regulation including enforcement of the rules of practice including violations of the Act. The TSBEP should be maintained as the composition of the board affords informed regulation of the practice of psychology within the state of Texas, as those with knowledge and experience in psychology oversee the enforcement of the Act and rules. The TSBEP has disciplined members of the psychology profession appropriately based on the Act and rules. By consolidating the TSBEP under a larger regulatory agency, the public of Texas will be placed at unnecessary risk. The potential impact of the provision of psychological services is life changing and these services should be directly regulated and rules enforced by those with specialized knowledge and experience. As presented in the Sunset Commission Staff Report, the data indicate that TSBEP is highly efficient and effective in the management of the practice of psychology. Customer service is quite good and complaints and licensing procedures all well managed in a timely manner. The consolidation of the agency under a large regulatory mechanism would likely impair these processes.

Any Alternative or New Recommendations on This Agency:

1) Allow Licensed Specialists in School Psychology to practice in all educational settings. TSBEP Rule 465.38 defines Psychological Services in the Schools. It states, "The specialist in school psychology license permits the licensee to provide school psychological services only in Texas public schools. A person utilizing this license may not provide psychological services in any context or capacity outside of their employment or contract with public schools."

The intent of this rule, when written, was to prevent the LSSP from providing services outside of the school setting, such as in hospitals, clinics, and in private practice. LSSPs are trained and have experience in helping all children to achieve educational success, whether in public or private school settings. This rule prohibits the LSSP from working with students in private school settings and limits the allowable services to students educated in private school settings. As a result, students in private schools are denied access to these specialized, psychological services that are afforded to students in the public school system, which, in turn, may prevent students with disabilities or social/emotional concerns from receiving needed services.

This provision would give more Texas school children broader access to school-based psychological services. There are 1,750 private schools in Texas, serving 306,394 students. If approximately 10% of school-age students experience learning difficulties and educational disabilities, these schools represent more than 30,000 children who are not receiving targeted, evidence-based interventions designed by school psychologists to improve their learning experiences.

2) Rename licensure from "Licensed Specialist in School Psychology (LSSP)" to "School Psychologist"

This will eliminate confusion experienced by parents, educators, consumers, and the public and will establish consistency with other statutory and regulatory language that require the practice of school psychology to conform to national standards of practice.

3) 2. Ensure proportionate Representation of LSSPs on the TSBEP

School psychologists (LSSPs) represent 30% of the licensees regulated by TSBEP, but only have half of one seat on the TSBEP board. The TSBEP should reflect the professionals whom they regulate. This would simplify regulation and enforcement activities by ensuring that those most knowledgeable about the various types of psychology practice are included in protecting the public.

My Comment Will Be Made Public: I agree