

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Psychology Board Independence for Public Welfare
Date: Friday, April 27, 2018 9:12:23 AM

From: rkownacki@sw.rr.com
Sent: Friday, April 27, 2018 9:02 AM
To: Sunset Advisory Commission
Subject: Psychology Board Independence for Public Welfare

Dear Sunset Committee Members:
April 27, 2018

Re: Keep Psychology (TSBEP) licensing board independent as public welfare concern

As a doctoral level psychologist in private practice, I request the following:

1. TSBEP should remain an independent board and agency.
2. The doctoral standard should be the entry level to the profession of psychology.
3. A competency exam (oral exam or EPPP-2) should be required for licensure.
4. Psychologists need to be the majority of members on the TSBEP board.
5. Implement PSYPACT and create guidelines for telehealth services.

Doctoral level training and experience should be the requirement for independent practice as a psychologist, not a master's degree. I got my masters degree in psychology, then spent the next 3 years earning a doctorate. This involved 3 more years of post graduate level coursework, to study psychopathology, testing, diagnosis, interpretation and treatment. I then completed a one year internship at a VA hospital. During those 4 years beyond the masters degree, I worked with 2-3 dozen doctoral level psychologists with decades of experience, to refine the clinical skills needed for independent practice. Then after the internship, I worked 4 more years for postdoctoral experience, at the state forensic hospital, under supervision of doctoral level psychologists, and in consultation with several psychiatrists—perfecting the application of all my training to clinical practice. Then I went into private practice, first with a year work with established psychologists in town....then for the last 15 years I have worked on my own.

For the past 7 years, I've had a masters level psychological associate (LPA) administering psychological tests for me. The LPA recently received Independent Practice status from TSBEP. Administering tests is only about 10% of the job duties of a psychologist in private practice. The other 90% is the clinical expertise which I gained by completing multiple years of postgraduate education and supervised experience, as outline above. Granting somebody independent practice status without the necessary training and experience is endangerment to the public. It would be like letting an xray technician with several years of experience independently practice medicine.

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“If you think one person cannot make a difference,
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