

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, April 29, 2018 3:03 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Anna Elisabeth

Last Name: Middleton

Title: Psychologist

Organization you are affiliated with: Texas Psychological Association; Capital Area Psychological Association

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I oppose consolidation for the Texas State Board of Examiners of Psychologists, and favor consolidation for the other mental health boards (Social Work, Licensed Professional Counselors, and Marriage and Family Therapists). Psychology has a well functioning board, as is evidenced in the Sunset Commission Report, and I strongly feel it would be detrimental to dismantle a board that is functioning exceptionally well.

Any Alternative or New Recommendations on This Agency:
Testimony to the Sunset Committee
Anna Elisabeth Middleton, Ph.D.
April 25, 2018

Hello. My name is Elisabeth Middleton and I am a Board Member of the Texas Psychological Association and the Capital Area Psychological Association. I am a psychologist in private practice here in the Austin area. I'd like to thank the Sunset Committee for your hard work, both to those who served last session and special session, and those who are currently serving. Senator Watson is my Senator and I want to thank you for all you do for our city, especially for mental health.

I am here today as a psychologist representing the field of psychology. It is clear that the other mental health fields want to combine their boards, and we are in favor of them doing so. We would like to retain our current board, the Texas State Board of Examiners of Psychologists (TSBEP) since, as has been stated repeatedly in the current Sunset report, it is functioning well and without problems. We do not want our board dismantled when it is already working well. As can be observed with the other mental health professions, having a poorly functioning board can have terrible implications for public protection by creating problems for adequate access to mental health resources, slowing turn around times for licensing, and allowing professionals who have serious complaints against them to continue practicing while complaints take a long time to process. Why would we want to deconstruct an agency that is NOT costing the state money and risk having another dysfunctional agency? A combined model has already been

attempted many times in other states and there have been no examples of success. There is currently one combined agency in Kansas and it is not functioning well.

Psychology is a complex profession with complex rules. Our members pay more fees than any of the other boards. We have no problem paying more if need be in order to keep our board separate. There has been concern over anti-trust issues, but there are no other boards, including small boards like the Chiropractic Board and the Board of Occupational Therapy, that have been subsumed under another board for this reason. The board's duty is to protect the public and not themselves. This is not to minimize the need for protection against lawsuits, but as was expressed by Psychologists who testified during our recent Sunset Commission testimony on April 25th, 2018, there are better ways of doing this.

I would like to give a personal example where I have recently experienced the efficiency of our Texas State Board of Examiners of Psychologists. I recently had the unfortunate occurrence where I went to renew my license and it took longer than expected to receive it in the mail. When I checked online to see what had happened it said my license was delinquent, which meant I was not allowed to practice! I showed up at the licensing board's office the next morning at 7:45am so that I would be there when it opened at 8am. Someone let me in at 7:50am so that I could wait on the couch until the right person could help me. I was frazzled knowing that I had clients to see. It turns out that I had not received a letter telling me that I needed to be fingerprinted. I was given instructions and the matter was cleared up within a week. If I had been forced to wait for weeks or even months, this could have delayed appointments with clients, causing them distress and me a loss in income. I appreciate that whenever I have contacted the board they have been efficient and courteous, as they proved to be in this instance.

In summary, the TSBEP is a mental health board that works exceptionally well according to the Sunset review. Psychology is a profession with complex rules related to multiple areas of focus. We feel strongly that we be allowed to remain independent. We are also interested in keeping our post-doctoral year and oral exam. Thank you for your consideration.

Anna Elisabeth Middleton, Ph.D.

My Comment Will Be Made Public: I agree