

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, November 28, 2016 8:12:07 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, November 25, 2016 4:28 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Modern

Last Name: Psychologist

Title: Chief of Operations

Organization you are affiliated with: modernpsychologist.com

Email: info@modernpsychologist.com

City: Austin

State: Texas

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

ISSUE #1: The Board's Oral Examination Is an Unnecessary Requirement for Licensure

WE AGREE: The Oral Exam is an extremely outdated practice that only protects incumbent psychologists from the competition by delaying entrance to the market, to otherwise well-qualified providers.

There is no evidence that the public is facing some sort of previously unheard of crisis in terms of safety from currently practicing psychologists.

This scare tactic is often used by the Association for State and Provincial Psychology Boards (ASPPB), which TSBEP unnecessarily pays thousands of dollars for its needless membership in fees. This corporation generates millions of dollars by selling tests, and some other products, such as the Psychology Interjurisdictional Compact (PSYPACT), to individuals forced to purchase it because they are applying for a psychology license. While the TSBEP boards does not have to do what ASPPB tells them to do, the social pressures and group-think to conform seem very serious, and boards have neither the time or expertise to analyze the quality issues of these redundant hurdles. It is ironic that the elite discipline for test development and use, the professionals who literally set the bar for quality, can so far miss the mark, and do so with its own future generations.

ISSUE #2: Requiring a Year of Post-Doctoral Supervision Is an Unnecessary Hurdle to Licensure, Potentially Contributing to the Mental Health Care Provider Shortage in Texas

WE AGREE: Neither the Military (DOD), the Dept. of Veterans Affairs, Dept. of Justice, the Indian Health Service, nor any public health federal jurisdictions have this cumbersome requirement for entry-level psychologists. Since an independent Licensing Task Force by the American Psychological Association evaluated this issue in 2006, 15 jurisdictions have followed suit to improve access to care and boost market competition. This post-doctoral year

should be an option to those seeking specializations, higher pay, promotions, and not a burden to the consumers and business competitors of the state. Current psychologists concern that they may lose mobility is flawed, because this supervised year has already occurred, or it could be documented by the individual (as with the other experiences) for those seeking to move their businesses elsewhere.

There is no evidence to suggest this is not sufficient for appropriate training. Trainees are already held to high standards through a variety of benchmarks, including but not limited to: accredited doctoral programs (with final oral and written exams), multiple practicums where competency is repeatedly assessed by a supervising psychologist, completion of formal internship training (also approved and regulated by APA and APPIC), background checks, and jurisprudence exams. Even then, if the board believes there is a problem, the board can request additional assessments.

**ISSUE #3: Key Elements of the Board's Licensing and Regulatory Functions Do Not Conform to Common Licensing Standards.**

WE AGREE to all recommendations made by the commission, and we incorporate by reference as though fully set forth herein the testimonies in Issues 1 through 2.

**ISSUE #4: Texas Should Continue Regulating Psychologists, but Decisions on the Structure of the Texas State Board of Examiners of Psychologists Await Further Review**

WE AGREE to all recommendations made by the commission, and we incorporate by reference as though fully set forth herein the testimonies in Issues 1 through 2.

**ISSUE #5: A Recent Court Decision Opens the Door to Unlicensed Practice of Psychology.**

WE AGREE to all recommendations made by the commission, and we incorporate by reference as though fully set forth herein the testimonies in Issues 1 through 2.

Any Alternative or New Recommendations on This Agency:

**WE HEREBY PRESENT NEW RECOMMENDATIONS TO THE COMMISSION:**

1-Direct the Board to give automatic reciprocity to military and veterans unrestrictedly licensed to practice psychology in any state. It is time for licensing boards stop creating obstacles that harm the men and women who served our country and the public's access to care. It is disgraceful when the TSBEP enact rules that merely protects their relationship and private interests with ASPPB, and NOT the needs of the public, and equal protections for our military and veterans.

2- Direct the Board to Withdraw its Membership from the ASPPB, which promoted anti-competitive practices in our State by exacerbating the quantity of mental health services and availability, reduced supply of mental health services, reduced consumer's choice, restricted innovation, kept prices high, and delayed prospective competitors from entering the market.

My Comment Will Be Made Public: I agree