

FROM: EXECUTIVE SUMMARY TSBEP BY: HTTP://NERVIANO.NET

The board unnecessarily limits entry into the profession. I agree!

Issues and Recommendations: **ISSUE 1**

The Board's Oral Examination Is an Unnecessary Requirement for Licensure.

[.... Most notably, the board's unnecessary oral examination places an extraordinary strain on agency staff and resources and creates a bottleneck to entry into the profession... the oral examination is an outdated practice that introduces subjectivity into the licensing process and offers little value in assessing candidates' minimum competency to practice psychology...]

Key Recommendation

Eliminate the statutory authority for the psychology board to administer an oral exam.

I TOTALLY AGREE: *I did this for my first license in KY years ago. Subsequently licensed in Ohio, Alaska and Pennsylvania - only needed knowledge of state laws and regulations about practice. Worked at several VAMCs and USA, USAF bases - folks licensed in any state, don't see any differences except difficulty in getting licensed! [My current license in PA does me no good in TX since PA has no reciprocity with any other state!] SEE ATTACHED RESUME FOR MY COMPLETE PROFESSIONAL BACKGROUND AND EXPERIENCE.*

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.

[Additionally, requiring candidates for licensure to complete a year of supervised work experience after receiving a Ph.D. adds another unnecessary hurdle to licensure, one that is no longer universally accepted.]

Key Recommendation

Remove the statutory requirement for psychologists to earn half of their supervised work experience after receiving their doctoral degree.

I TOTALLY AGREE! Please see above comments about my current and prior licenses and experience as a Federal Clinical Psychologist, VA, USA and USAF.

ISSUE 3

Key Elements of the Board's Licensing and Regulatory Functions Do Not Conform to Common Licensing Standards... Specifically, requirements to apply for a provisional license **and** to submit letters of recommendation make the process for becoming a licensed psychologist overly burdensome, etc.

Key Recommendations

=>Remove the requirement for a separate provisional psychologist license and instead authorize the board to grant provisional status to applicants for full licensure.

I TOTALLY AGREE (see above)

=>Direct the board to remove the requirement for letters of reference.

I TOTALLY AGREE (see above)

[Regarding other details I have no objection as it seems common sense.]

ISSUE 4

Texas Should Continue Regulating Psychologists, but Decisions on the Structure of the Texas State Board of Examiners of Psychologists Await Further Review.....

Key Recommendation

- Continue the regulation of psychologists, but postpone the decision on continuation of the Texas State Board of Examiners of Psychologists until completion of the Sunset reviews of other health licensing agencies. ***I prefer a separate board given problems in other states like NY - but if the other issues above cannot be fixed without a change I would agree.***

Key Recommendation

- Direct the Texas State Board of Examiners of Psychologists to develop proposed definitions of the practice of psychology.
- Request the Senate Health and Human Services Committee and the House Public Health Committee to take action to define the practice of psychology and consider clarifying the scope of practice of other mental health professionals. ***SEE*** =>

In this (alone) I AGREE WITH *The Texas Psychological Association Board of Trustees*:

TSBEP may be unable to prosecute the unlicensed practice of psychology and could have difficulty in enforcing practice standards from individuals who claim to be practicing a particular activity which constitutes the practice of psychology.

I TOTALLY AGREE! (although not yet A TX licensee)

=>In Texas, we (they) have a practice act and a title act. Having a practice act is necessary to create an enforceable statute that without one an individual could engage in unlicensed practice. **YES!!**

=>A practice act protects the health and safety of Texans. **YES!!**

=>Psychologists diagnose in their practice and even include a diagnostic code on insurance forms. **YES!!**

=>Psychiatrists who consult with psychologists ask the PSYCHOLOGIST to provide a diagnoses so they can prescribe medication. **YES!!** (Pediatricians and family practice doctors too - ***but we also*** need to refer to a Psychiatrist as a second independent provider if it is a complex case, especially that might require hospitalization).

=>The Medicare Definition of psychologists includes the word diagnose in the definition. If the federal government recognizes these type of service then Texas should as well. **YES!!**

ALSO: Please consider who loses \$ and status if the onerous stuff is changed!

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