

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Texas State Board of Examiners of Psychologists  
**Date:** Friday, November 18, 2016 9:41:40 AM

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**Sent:** Friday, November 18, 2016 9:39 AM  
**To:** Sunset Advisory Commission  
**Cc:** admin@texaspsyc.org  
**Subject:** Texas State Board of Examiners of Psychologists

Dear Sunset Commission Members:

I am a doctor of psychology, licensed by the State of Texas to practice in this valuable field of service to the citizens of our State. In order to ensure continued excellence in psychological services to Texans, I am writing to provide you with insight and, hopefully, to provide some guidance in your deliberations regarding the issues before you as you review the board that oversees the quality of these services, the Texas State Board of Examiners of Psychologists (TSBEP). In particular, I would like to address the issues of the oral exam, the post-doctoral training hours, the independence of the TSBEP, and a change in the definition of psychology:

### **Oral Exam**

Our profession requires face-to-face interactions with our patients/clients. The oral exam is a valuable component of ensuring competency in our field and should be retained in order to guarantee continued excellence in our service provision to Texas citizens.

When I sat for the oral exams with our board, I was presented with scenarios and questions that remain relevant to my practice to this day. The professionals who administered the exam ensured that I considered, and continue to consider, the multiple layers and complexity of human behavior in the application of my interventions for my patients. This requirement is necessary to ensure that qualified licensed psychologists have the ability to treat patients at an educated and well-vetted level.

### **Post-Doctoral Hours**

The requirement for training hours above and beyond pre- or post-doctoral internship is also a necessary component of professional experience and must be retained. While the internship and work experiences I gained prior to the attainment of my doctoral degree were valuable, there is a definite qualitative difference in the experience provided during pre-doctoral training and the real world experience necessary after becoming a Ph.D., but before licensure. The pivotal and specific training that is unique to the post-doctoral training hours must be retained as a requirement for all licensed psychologists because this depth of knowledge is necessary for the well-being of our patients/clients. My pre-doctoral internship provided a breadth of experience in psychological practice, but it was through my post-doctoral work at the Veteran's Hospital that I received the depth of knowledge and practice required to provide the current services to my patients at Parkland Hospital in an ethical, research-informed, and proficient manner.

### **Independence of TSBEP**

It is imperative that we psychologists keep our independent board of examiners. Unlike many other mental health licensees whose agencies may be moving (or moved) to Texas Department of

Licensing and Regulation (TDLR), Psychology is a doctoral-level profession. It takes a special body of knowledge to provide guidance and consultation to the licensees of our profession. In addition, if TSBEP remains an independent agency, other behavioral health professionals who are seeking licensure could be housed within TSBEP and receive administrative support from the TSBEP staff.

Also important, TSBEP is a member of the Health Professional Council and actually provides administrative support to other members' agencies within HPC. If you remove a vital member of the agency this will result in a trickle down effect and the public will be impacted by not having adequate staff for their administrative functions. It is indisputably imperative that we keep our independent board.

### **New Definition of Psychology**

Our professional organization agrees that a new definition of psychology is needed; however, it is important that the new definition include diagnosis. Other health providers often rely upon psychologists to diagnose. The medical doctors with whom I work often ask for diagnoses in order to prescribe medications. As a private practitioner, as well as in my hospital practice, I have been required to diagnose and use diagnostic codes for billing purposes. In addition, the Medicare definition of psychologists includes the word "diagnose." Texas should be consistent with the Federal Government in recognizing diagnosis as a component of the definition of a psychologist.

I am proud to be a member of this valuable profession, and the work we do is extremely important to the citizens of the State of Texas. With the current focus on the impact of mental health on veterans, gun violence, people with substance abuse disorders, aging populations, child abuse victims, and many other populations, adherence to the standards that ensure quality services is more important than ever. I ardently believe that following the guidelines I have recommended will be safeguard the quality of service provision for Texans.

For future generations of psychologists to be able to provide the quality of service that is needed from our profession for the citizens of the State of Texas, it is imperative that we retain the oral exam; that the post-doctoral training hours remain a requirement; that the TSBEP remain independent; and that any definition of psychology for our state includes diagnosis.

Thank you very much for your consideration.

Sincerely,  
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