



November 28, 2016

Sunset Advisory Commission  
Ken Levine, Director  
Robert Romig, Staff Attorney  
PO Box 13066  
Austin, TX 78711

Dear Mr. Levine and Mr. Romig,

As President of the Texas Association of School Psychologists (TASP), the primary professional organization representing Licensed Specialists in School Psychology (LSSP), I am writing to provide TASP's comments on your recent staff report and review of the TSBEP, along with comments on the recently released report of the Health Licensing Consolidation Project. The following addresses specific recommendations made in the report, followed by comments which TASP feels should have been addressed in the report and are noticeably absent.

#### **Issues presented in Sunset Review of TSBEP**

- *Issue 1* – TASP has no position.
- *Issue 2* – TASP opposes the staff recommendation to eliminate a year of post-doctoral supervision.
- *Issue 3* – TASP has no position.
- *Issue 4* – TASP opposes the staff recommendation to consolidate TSBEP. TASP maintains that Texas should continue to regulate the practice of psychology and continues to hold the position that the TSBEP should serve as the regulatory and licensing agency. TASP opposes the staff recommendation in the Health Licensing Consolidation Project report to consolidate the agency into the TDLR with other licensing boards. TSBEP is an efficient agency. The staff of TSBEP provides excellent customer service, is accessible, and responds to licensee and public requests in a timely manner. That nature of licensing psychologists requires the expertise of an executive director with knowledge of the specific training and practices of psychologists in order to adequately and efficiently protect the public. Further, the complexity and sensitive nature of services provided by licensees requires comprehensive oversight by an agency with a staff that has the experience, knowledge, and specialization possessed by the TSBEP. The agency correctly argues it has taken them ten years to effectively understand their licensees and the nuances in the practice of psychology in Texas. Eliminating the agency will set the regulation of psychology in Texas back at least ten years. While TDLR is efficiently-run, regulating psychology practitioners through a general agency will limit the discretion to consider mitigating and aggravating circumstances involving complaints and their legitimacy, further complicating similar circumstances regarding dual license holders. Sunset staff's review focused on the financial aspect of the agency, while disregarding



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the human aspect of the agency that is provided by the staff. This aspect supports the work licensees provide the public, which elevates the practice of psychology and has a direct effect on the protection of the public.

- *Issue 5* – TASP supports the recommendation for TSBEP to develop proposed definitions of the practice of psychology.

### Issues NOT addressed in Sunset Review of TSBEP

- *Rename licensure from "Licensed Specialist in School Psychology (LSSP)" to "School Psychologist"*  
**Rationale:** This will eliminate confusion experienced by parents, educators, consumers, and the public.
- *Ensure proportionate Representation of LSSPs on the TSBEP*  
**Rationale:** School psychologists represent 30% of the licensees regulated by TSBEP, but only have half of one seat on the TSBEP board.
- *Allow LSSPs to practice in private schools*  
**Rationale:** While currently prohibited, this will enable students in private schools to receive access to mental health services.
- *Align State Law and Regulation for Practice to Reflect National Standards for the Practice of School Psychology*  
**Rationale:** As a matter of alignment, the state standards should be in line with the national standards.
- *Ensure that LSSPs have a conferred degree in School Psychology or a Re-Specialization Certification from a School Psychology Program*  
**Rationale:** This will ensure those who seek to work with children are trained in this area of practice.
- *Remove the Prohibition of LSSPs Ability to Practice in Private Clinics*  
**Rationale:** This provides access to services for children who would not have access to mental health services.

This letter comes as feedback on the recently published reports regarding the Sunset Review of TSBEP and the Health Licensing Consolidation Project. The purpose of these initiatives is to protect and improve services and access for children. TASP appreciates the time and thorough review of the agency selected by the State to protect the public by licensing and regulating those practicing psychology. If I may be of further assistance or provide additional clarification, please contact me at [president@txasp.org](mailto:president@txasp.org) or (806) 441-0234.

Sincerely,

Brook Roberts, MA, LSSP  
President

Texas Association of School Psychologists