

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, April 10, 2018 11:14:16 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, April 10, 2018 10:45 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Brook

Last Name: Roberts

Title: School Psychology Clinical Coordinator

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State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: As a licensee of the TSBEP, licensed to provide school psychological services in Texas, I support the Sunset's staff report to consolidate the behavioral health boards into one agency, which solves any possible vulnerability due to anti-trust violations. For too long, LPs have controlled the TSBEP, making the agency susceptible to legal action due to the lack of oversight.

Any Alternative or New Recommendations on This Agency:

However, the composition of the BHEC's advisory committee should include representation of each licensing professional. For example, currently, the TSBEP licenses LPs, LPAs, and LSSPs, but representation is disproportionate.

LSSPs represent almost 50% of the TSBEP's licensees, yet do not have a full seat on the Board. The advisory committee should have representation from each licensing type: LBSW, LMSW, LCSW, LPC, LSSP, LP, LPA, etc.

Secondly, licensed specialists in school psychology are prohibited from practicing school psychology outside of the school setting, which limits access of the public to comprehensive educational services. Many families would like access to school psychological services which may improve their children's behavior and learning but may be unable to access those services through the school system. Several states permit licensees to provide school psychological services outside of the school settings as Licensed Educational Psychologists. The Sunset Commission should direct TSBEP to facilitate this process.

Next, for some strange reason, all of the licensees of the behavioral health boards may be designated by statute as Licensed Professionals of the Healing Arts, except Licensed Specialists in School Psychology, which enables insurance billing and reimbursement for services. The Sunset Commission should investigate the reasoning for this exclusion and recommend TSBEP to address this disparate practice. The implication of this is that certain state agencies (e.g., Early Childhood Intervention) and other institutions (e.g., hospitals) are not able to employ LSSPs to provide services and evaluations for children in need, contributing to the problem of already critical shortages of

mental health providers.

Finally, the Sunset Commission should direct TSBEP to create a rule to eliminate the practice of citing LSSPs for referring to themselves in speech and in writing as "school psychologists." Most other states recognize those who provide school psychological services as school psychologists if they have met the state's licensing requirements and standards set and established by the National Association of School Psychologists. However, Texas continues to insist and maintain that these professionals shall only use the title, "Licensed Specialist in School Psychology." This misleads the public and confuses consumers of school psychological services, which leads parents, families, and educators to be unaware of how to access school psychological services.

I am happy to work with congressional representatives to solve these problems and draft legislation which will serve the public better. If I may be of some help, please feel free to contact me at 806-441-0234.

My Comment Will Be Made Public: I agree