

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, April 26, 2018 8:57:49 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, April 26, 2018 8:53 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Leslie

Last Name: Rosenstein

Title:

Organization you are affiliated with:

Email:

City: Dallas

State: Texas

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

I strongly oppose allowing TSBEP to eliminate the oral exam. I am also strongly opposed to eliminating the postdoctoral year of training required for licensure as a psychologist.

First, the oral exam has established incremental validity as well as content validity and very strong inter-rater reliability. With respect to incremental validity, the exam annually screens out approximately 10% of applicants who have passed the written exam (the EPPP) but are ill-prepared to care for patients; those applicants have the option of gaining further training and preparation and re-taking the exam at a later date (as early as six months later). As a former examiner and former chair of the Oral Exam Committee, I can attest to the fact that those applicants who fail the oral exam are not prepared to offer services safely to our vulnerable citizens. Allowing those individuals to practice independently without remediation puts our citizens at grave risk. Patients with mental illness sometimes take their own lives. On rare occasion, individuals take the lives of others during psychotic breaks. Allowing ill-prepared individuals to practice is extremely dangerous as they may fail to prevent these unnecessary deaths.

Removing the post-doctoral year of training will further undermine the TSBEP's ability to ensure that licensees are adequately prepared to practice independently and safely. It is during the postdoctoral year of training in which applicants obtain the most intensive training and experience under supervision, and when they really learn to apply their knowledge and skills on a day-to-day basis.

I would also like to note that removing the oral exam as a means to remove an obstacle to obtaining licensure will backfire when the TSBEP votes to require the new EPPP-2 written exam for licensure. The EPPP, already required, costs over \$600 for applicants to take, and I assume the additional EPPP-2 will similarly cost in that range. Moreover, the studying and preparation time for the second written exam will present much more of an obstacle than a practice-based oral exam.

In addition, removing the postdoctoral year of training will not increase the number of practicing psychologists in Texas. First, you cannot increase the number of psychologists over the long term without increasing the number of individuals who enter school to obtain advanced degrees in Psychology.

Secondly, individuals are practicing psychology during their postdoctoral year of training, only they are doing so under supervision. In fact, postdoctoral training opportunities can include sites offering services to the traditionally under-served, including those in rural areas.

Any Alternative or New Recommendations on This Agency: Maintain the requirement for the oral exam and not the EPPP-2. Maintain the required postdoctoral year of supervision. Establish competency-based criteria for specialty practice. Maintain the doctoral standard for independent practice.

My Comment Will Be Made Public: I agree