

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 30, 2018 9:37:37 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, April 30, 2018 9:24 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: David

Last Name: Salisbury

Title: Clinical Director

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State: Texas

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

I strongly oppose allowing TSBEP to eliminate the oral exam and postdoctoral year of training required for licensure as a psychologist. Both are securities to ensure public safety and provider competence.

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. The system does help capture the cases where an applicant did not receive appropriate training or training sites failed to hold back their progress despite red flags. 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). This in person mechanism to help screen providers who may serve citizens at the greatest risk should not be abandoned due to inconvenience or the minimal cost of the process considering the benefit.

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. This is when most individuals truly learn how to function more independently.

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: See above. Keeping the oral exam is recommended. Keeping the post-doctoral year should be of the highest importance for community safety.

My Comment Will Be Made Public: I agree