

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, December 07, 2016 10:00:16 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, December 07, 2016 9:15 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Brooke

Last Name: Simmons

Title: Coordinator of Psychological Services, LSSP, LPA

Organization you are affiliated with: Public Schools

Email: brooke.simmons@comalisd.org

City: New Braunfels

State: Texas

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

Regarding the Sunset Commission report:

Issue #1- No position

Issue #2- No position

Issue #3- No position

Issue #4- Opposed; the TSBEP should be maintained as the agency regulating the practice of psychology in Texas, including Licensed Specialists in School Psychology.

Issue #5- Supported; the State needs to adopt a new definition of the practice of psychology as a result of the decision of the 5th Circuit Court.

Any Alternative or New Recommendations on This Agency:

Alternative: Issue #4- Opposed; the TSBEP should be maintained as the agency regulating the practice of psychology in Texas, including Licensed Specialists in School Psychology.

New Recommendations:

-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 presently have half of one seat on the TSBEP board.

-Allow LSSPs to practice in private schools

Rationale: While this is currently prohibited, it 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 applied field of psychology.

-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.

My Comment Will Be Made Public: I agree