

LUCY T. SMITH, PHD

CLINICAL PSYCHOLOGIST

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April 11, 2018

To: Sunset Advisory Commission
From: Lucy T Smith, PhD

Dear Sunset Advisory Committee-

My name is Lucy Smith, and I am a licensed psychologist in private practice in Dallas, Texas. I have been independently licensed as a psychologist in the state of Texas since 2010. Thank you for the opportunity to provide feedback related to the current Sunset process.

- 1) **I believe that TSBEP should remain an independent board and agency.** I feel concerned that its scope, influence, and effectiveness will be reduced should the regulation of psychology be collapsed into a board with various other disciplines. I believe that although similar to related fields, the practice of psychology has unique parameters (including unique ethics, rules, and regulations) that warrant a separate and independent governing agency. In addition, the Sunset staff report explicitly states that "The independent psychology board is a well-functioning agency." I feel concerned about combining it with the three other agencies when the staff report explicitly states that these other agencies are poorly run.
- 2) **I believe that the doctoral standard should be maintained as the entry-level educational requirement to the profession of psychology.** I believe that a doctoral degree provides a different level of training and experience than is obtained in a terminal Master's program. I have personal experience with this, as I completed a Master's program in clinical/counseling psychology before enrolling in a PhD program in Clinical Psychology. There is no judgment in this assertion - I am not insinuating that an individual with a doctoral degree is a better therapist than an individual with a Master's degree. Rather, I believe that there are differences in the training, education, and experiences of those with a doctoral degree in psychology/counseling versus those with a Master's degree in the same discipline. Therefore, I think it makes sense for each level of education/training to be governed by its own independent licensing board. Individuals who hold a Master's degree in psychology are welcome to apply for an LPC license if they are not interested in pursuing a doctoral degree.


- 3) **I believe the board should require competency exams (both the oral exam and the EPPP-2) as prerequisites for licensure.** Yes, these are big hurdles! But I also feel that they raise the bar and help ensure that only the most qualified individuals who have demonstrated competency in the field and in practice are able to maintain an independent license for practice. Training programs vary widely in what they teach and how they train providers. I think it is therefore helpful to have a standard way to evaluate and ensure that individuals have mastered a baseline level of skills, knowledge, and expertise. This standardization helps protect the public from individuals who are not ready for independent practice. Individuals who do not wish to exert the added time, energy, and effort required to overcome these hurdles are welcome to instead pursue another mental health license that requires less education, training, and preparation. More generally, I am very supportive of encouraging resilience, grit, and hard work, rather than being willing to advocate lowering the standards to make it easier.

With regard to logistical hurdles related to the administration of the oral exam, I believe that some creative problem solving could help engender alternative solutions. For instance, the oral exam could be offered in all major cities in Texas, thereby making it far easier for professionals to volunteer to administer the exam, as well as more convenient for potential licensees to be able to sit for the exam.

- 4) **I fully support the implementation of PSYPACT and the creation of professional guidelines for telehealth services.** It seems that technology has surpassed our current rules and typical understanding/framework for the dissemination of psychological services. As a clinician who works with teenagers and young adults (especially those who go off to college) and with individuals who travel often for work, I am invested in our field creating standards for best practice. I like the idea of licensed psychologists being able to practice across state lines when such an arrangement is in the best interest of the client and his/her care (which is one of the main aims of PSYPACT). It would be extremely valuable if the regulating bodies of psychology would address the shifts in practice and the different opportunities that technology affords.

Thank you so much for your time and consideration of these issues. Please do not hesitate to reach out if you have any questions/concerns or if there is any help/support I can provide.

Sincerely,



Lucy T. Smith, PhD
Licensed Psychologist