

TAPA

Texas Association of Psychological Associates

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The Texas Association for Psychological Associates (TAPA) provides the following summary for the public testimony in response to the Sunset Advisory Commission staff recommendations for the Texas State Board of Examiners of Psychologists on December 8 and 9, 2016.

The document summarizes the testimony for the presenters named above. There are several overlapping themes. Texas is a very large state -- 268,597 square miles, with unmet mental health needs particularly in rural areas. The 2016 Distribution of PhD-Psychologist document (Attachment # 1) provides a quick snapshot representing the critical shortage of licensed psychologists (LPs) across the majority of the state. Given the crisis in adequate provision of mental health services across the state, this map illustrates part of the problem. Another component contributing to this shortage of trained mental health providers is that licensed psychological associates (LPAs) who are professionals trained with a master's degree focused in psychology, are severely limited in their ability to practice the work for which they were trained. This restriction occurs because there is a requirement that in private practice or in those settings using private practice standards, LPAs must work under the supervision of the LP. Since 81.3% of the LPs provide services in 15 Texas counties, the LPAs are also limited to working in those areas where there is an LP to provide the supervision.

Another restriction is the stipulation that insurance reimbursement is almost impossible because the LPA license is not a license that is considered in the realm of "independent practice", because of the requirement of supervision in private practice settings. Consequently, in settings where psychological services are needed, if an LP is not available, then the needs of these patients are simply not met. Even if an LP is available, the supervision adds additional costs without direct services. There are specific stipulations in Medicare and Medicaid that limit reimbursement to individuals who hold licenses where additional supervision is not required. (Attachment #2.) Most insurance and federal reimbursement sources have adopted these standards.

One population that is severely under-served is the veteran community. Often the veterans live outside of the major urban areas, and must travel long distances to receive services. The 1,105 LPAs (Sunset report, 2016) could help provide sorely needed services for this group, as well as many others who would benefit from mental health services.

The TSBEP provides protection of the public by requiring high training standards. However, current Board rules indicate the requirement of 42 hours, at least 27 graduate level credit hours in psychology, and 450 supervised practicum/intern hours (TSBEP Rules §463.8 (c)). Other master level providers are able to practice independently because their academic and supervision requirements are significantly higher than the TSBEP requirements. One example is the licensed professional counselors who will be required by August, 2017 to complete 60 academic course hours (22 TAC 681, E §681.82) and 3,000 hours supervised experience, including 1500 direct client counseling (22 TAC 681 §681.93). Many of the Texas universities with terminal master degrees in psychology currently offer a 60 hour program course of study (i.e., Midwestern State University) that exceeds the TSBEP minimal requirements. (Attachment # 3) Consequently, it is incumbent on the TSBEP to increase the requirements for licensed psychological associates to be in line with other master level mental health practitioners.

An important topic before the Sunset Commission related to the continuation of the Texas State Board of Psychologist as a single entity or the possible decision to consolidate this board with other mental health care licensing agencies under the Texas Department of Licensing and Regulation. As professional practitioners, the members of the Texas Association for Psychological Associates would like to be treated fairly. The Psychology Board has a history of systematically limiting the opportunities for LPAs while promoting the interests of Licensed Psychologists. We recommend that the Psychology Board be constituted of two Licensed Psychologists, two Licensed Psychological Associates and two Licensed Specialists in School Psychology who hold only that single license.

Licensed psychological associates would like to work in many settings throughout Texas for which they are qualified, but are unable to do so at this time. The unnecessary requirement for supervision severely limits the opportunities for work.

Given the current crisis in providing mental health services, the services of licensed psychological associates are greatly needed. There is no additional cost to the state to remove the restrictions on the provision of their services and to enable these psychology practitioners to provide the services for which they were trained.