

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Testimony for April 25, 2018, Hearing
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From: Mary Vance
Sent: Monday, April 30, 2018 10:04 PM
To: Sunset Advisory Commission
Subject: Testimony for April 25, 2018, Hearing

Testimony to the Sunset Advisory Commission
Mary Vance, PhD
April 25, 2018

Dear Commission Members, My name is Mary Vance, and I am a psychologist working in private practice in Austin. I have had a license to practice psychology for 20 years, with a license in Texas since 2004 when I returned to Austin for a position at the University of Texas Counseling and Mental Health Center. I am a member of the Capital Area Psychological Association and the American Psychological Association. First, I would like to thank the Sunset Commission members, both past and present, for your committed service. I attended the recent hearing on April 25, 2018, and came away with an even greater appreciation for your work to address the complex issues regarding the regulation of behavioral health practices in Texas. Senator Watson is my Senator, and I thank him for his service representing those of us in Austin, including his commitment to mental health issues.

I am writing as a psychologist representing the field of psychology, and urge the Commission to retain the Texas State Board of Examiners of Psychologists (TSBEP) rather than include the Psychology Board in the consolidation of the other behavioral health boards. There is strong support among practitioners regulated by the three other boards for a consolidation in order to address serious problems such as the backlog addressing complaints against practitioners and significant delays processing licensure. I, and other psychologists, support whatever other formal changes could address these critical concerns for colleagues in the affected professions.

However, in the Commission hearing on April 25, several Commission members noted the discrepancy between the position taken by psychologists and members of the other mental disciplines regarding the proposed consolidation of behavioral health boards – as well as the discrepancy between psychologists and their own board recommendation. I much appreciated the interest and desire on the part of Commission members to understand the reasons for these strong differences, and hope the testimony provided by psychologists contributed to further understanding. I have several reasons for strongly advocating the retention of the TSBEP. As you have heard from many psychologists, our experience is that the Board is working very well (a point also made in the Commission report), and that the TSBEP functions at no cost to taxpayers. Because the fundamental purpose of the Board is to protect the consumer, it is vital that a Board function at the level the TSBEP does. I have strong concerns about the consequences for consumers should the TSBEP be dismantled. Further, while there are similar areas of training and education among the mental health disciplines, there are also significant differences in training, education, and emphasis. Maintaining a separate board provides more informed and efficient oversight of the practice of psychology for Texas

consumers.

Additionally, the history in other states where behavioral health services were consolidated under one board indicates these trials were not successful, and those states (with one exception) have returned to separate board oversight for the different disciplines. It was clear in the hearing on April 25 that members of the Commission were not fully informed regarding the problems in other states where consolidation had been attempted, and this data would be extremely valuable as the Commission weighs their decision. As I understand it, the consolidation arrangement is not working well for Kansas, the sole state remaining with this arrangement.

A concern raised about retaining the TSBEP pertains to anti-trust issues, referencing a Supreme Court ruling on a case in North Carolina involving the Dental Board. As mentioned in testimony at the April 25th hearing, no other board in Texas has consolidated or been absorbed in response to this ruling. Rather than dismantle the TSBEP in response to this ruling, I request consideration of alternative safeguards to preserve this Board, which functions so well at its primary purpose – to protect consumers.

As a final point, I urge retention of the post doctoral supervision year for psychologists. This is a critical year of closely supervised training in assessment, treatment, and ethical decision-making to further preparedness for independent practice. As we are all increasingly aware, the range of often serious challenges that face mental health practitioners are escalating. This licensure requirement serves the public well.

In closing, thank you for considering this input as you continue your important work on behalf of mental health consumers in Texas.

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