

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Texas Sunset Advisory Commission Staff Report – Texas State Board of Examiners of Psychologists
Date: Wednesday, November 30, 2016 4:36:46 PM

From: Nicholas Westers [mailto:Nicholas.Westers@childrens.com]
Sent: Wednesday, November 30, 2016 4:31 PM
To: Sunset Advisory Commission
Subject: Texas Sunset Advisory Commission Staff Report – Texas State Board of Examiners of Psychologists

Good afternoon,

I submitted the following letter to Sunset Commission Chairman Larry Gonzales through the sunset.texas.gov website, and I was hoping that a staff assistant would be able to distribute it to all the members of the Sunset Commission, including Chairman Gonzales in the event that my letter did not go through. Will you please distribute this to the commission members?

Thank you!

Nicholas J. Westers, Psy.D.
Clinical Psychologist, Children's Medical Center Dallas
Assistant Professor, UT Southwestern Medical Center
(214) 456-4134

Dear Sunset Commission Member:

As a licensed psychologist in the state of Texas, I urge you to consider the following concerns as you prepare for the December 8th Sunset Commission hearing regarding the Texas State Board of Examiners of Psychologists (TSBEP):

I am strongly opposed to the idea of moving TSBEP into a consolidated board. The psychology board is currently operating smoothly within a modest budget fully funded by license fees. Consolidating it with other agencies could have serious negative implications for the board's ability to protect the public, as a sophisticated and in-depth understanding of the rules, ethical standards, and nature of the profession of psychology are necessary in order to effectively address licensure complaints. A consolidated board would not have that depth of perspective or experience, to the detriment of the public. Many nuanced and quite different subspecialties exist within psychology; significant expertise in and familiarity with these specialized areas of practice is necessary for rule-making and application of rules so that minimal unintended consequences result from changes. A consolidated board would not have the resources to adequately account for subspecialty issues.

I am strongly in favor of maintaining the requirement for a postdoctoral year of training prior to full licensure. Removal of this requirement would make it easier to get a psychology license in Texas and may address short-term issues, but this proposed change is short-sighted and would increase risk for deficient service delivery and inadequate protection of public consumers. The postdoctoral year

provides training that is substantially different from pre-doctoral training with regard to the degree of both complexity and autonomy of clinical work. Additionally, the postdoctoral training year is a final opportunity for identification and remediation of any deficits in competency areas that may impact a licensee's ability to safely and independently provide services to the public. Removal of the postdoctoral standard of training would compromise psychologist training and result in independent licensure of many individuals who are not yet adequately prepared for unsupervised practice.

I am also strongly in favor of maintaining the requirement for the oral exam prior to full licensure. Psychology is a profession that requires face-to-face interaction and effective incorporation of legal and ethical standards into real-time problem solving and decision making. It is important that licensed psychologists be required to take this competency exam, as it tests a candidate's ability to interact with the public appropriately. Further, this exam allows the board to assess a candidate's understanding of their legal and ethical duties as an independently licensed health service provider, as well as their ability to apply this knowledge to patient care, before issuing a license which allows the candidate to practice psychology without supervision.

In summary, I am opposed to items 1 and 2 of the Sunset Advisory Commission staff report. I am also opposed to the separate staff report (released 11/15/16) recommending the consolidation of TSBEP under TDLR. I am in favor of a new definition of "psychologist" in Texas that acknowledges diagnosis as an essential component of the practice of psychology.

Thank you for the opportunity to provide comments on the Sunset review process for the Texas psychology practice act. Please feel free to contact me for clarification or additional information as needed at 214-456-4134.

Sincerely,

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Clinical Psychologist, Children's Medical Center Dallas
Assistant Professor, UT Southwestern Medical Center
(214) 456-4134

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