From: Sunset Advisory Commission

To: <u>Janet Wood</u>

Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)

**Date:** Wednesday, April 18, 2018 8:07:19 AM

----Original Message-----

From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]

Sent: Tuesday, April 17, 2018 6:55 PM To: Sunset Advisory Commission

Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PSYCHOLOGISTS

First Name: Timothy

Last Name: Wynkoop

Title: Clinicl Neuropsychologist

Organization you are affiliated with: Clinical Neuropsychologist

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

Disclaimer: I am member of the Board of Directors of the American Academy of Clinical Neuropsychology (AACN), the professional organization for ABPP board certified clinical neuropsychologists. I also have a faculty appointment at the University of Toledo Medical Center (UTMC). What follows are my personal views, not necessarily those of the AACN nor of UTMC.

Reviewing the Executive Summary regarding the merger of the Psychology, Marriage and Family, Counselor, and Social Work Boards, I developed some concerns:

First, is that the Commission compliments the Psychology Board for its management and regulation of the practice of psychology in Texas (for the protection of the residents of Texas) and then makes proposals for major licensing rule changes. This strikes me as non sequitur.

Second, is that combining the Psychology Board with the three other boards is meant to improve the management and regulation of the three other board's services to the residents of Texas, but will likely have a deleterious effect on the practice of psychology in Texas. History is replete with examples of using one entity to pull up another only to degrade both. Once this happens it will be difficult to undo (or to repair).

Third, the actions that Texas takes with regard to the Psychology Board will have implications for the regulation of psychology in other jurisdictions.

Please tread lightly, and reconsider radical changes such as disintegrating and re-birthing an entire board.

Any Alternative or New Recommendations on This Agency:

1. Leave the Psychology Board to itself. By the Commission's own assessment it does a good job for the residents

of Texas.

- 2. Require the other boards to emulate the Psychology Board's commitment to public and professional service, and its management style, perhaps using the Psychology Board as an organizational consultant to the other boards.
- 3. I also noticed that the board consolidation will cost the Texas taxpayers the better part of a million dollars in 2020. The boards should cover their own costs via licensing fees, with the proviso that they hire enough staff supplemented via licensed volunteers (e.g., professional committees and the like) to manage themselves effectively and efficiently.

Thank you.

My Comment Will Be Made Public: I agree