



Representative Richard Pena Raymond  
Chair, House Committee on Human Services  
P.O. Box 2910  
Austin, TX 78768

March 27, 2015

Re: Occupational Therapy bill HB 1998

Dear Chairman Raymond:

The Inter Organizational Practice Committee (IOPC) is a coalition of the American Academy of Clinical Neuropsychology (AACN), the Society for Clinical Neuropsychology/Division 40 of the American Psychological Association, the National Academy of Neuropsychology (NAN), the American Board of Professional Neuropsychology (ABN), and the American Psychological Practice Organization (APAPO) tasked with coordinating national neuropsychology advocacy efforts, and representing thousands of neuropsychologists in the United States.

The IOPC is writing to express our opposition to HB 1998 that characterizes occupational therapists as mental health providers. Labeling occupational therapists as mental health providers would mislead the public and might prevent some individuals with mental health problems from accessing competent, safe care.

Competent mental health care arises in the context of in-depth education and supervised training in the areas of psychological diagnosis and psychotherapy intervention. Mental health providers must be able to recognize specific psychological disorders in the context of complex patient presentations where medical illness, family issues, social, cultural, substance abuse, and other factors interact with mental health disorders. They must also be able to craft and carry out appropriate treatment plans in a manner that safely and effectively brings relief to patients seeking care.

Occupational therapists might have some coursework in beginning psychology concepts, but their education and supervised training falls far short of being able to competently and safely provide mental health services to Texas citizens. Currently, all mental health providers in Texas must have a minimum of a master's degree in a mental health field in order to practice in the state. Occupational therapists do not have a master's degree in a mental health field, and their primary coursework is in occupational therapy, not mental health care.

Current Texas statutes addressing occupational therapy practice (§454.006 of the Texas Occupations Code) specifically state that, "The practice of occupational therapy does not include diagnosis or psychological services of the type typically performed by a licensed psychologist."

Labeling occupational therapists as mental health clinicians will confuse and mislead the general public and lead to serious and potentially harmful consequences if citizens seek treatment from inadequately trained occupational therapists rather than fully trained mental health clinicians for mental health problems.

We thank you for your valuable time and consideration of these points and welcome any questions that you might have about the concerns outlined in this letter, and we would be happy to provide you with any additional information that you might find to be helpful ([karenpostal@comcast.net](mailto:karenpostal@comcast.net); 978-475-2025).

Respectfully submitted on behalf of the American Academy of Clinical Neuropsychology, National Academy of Neuropsychology, Division 40 (Neuropsychology) of the American Psychological Association, the American Board of Professional Neuropsychology, and the American Psychological Practice Organization,



Mark Mahone, Ph.D., ABPP  
President, American Academy of Clinical Neuropsychology



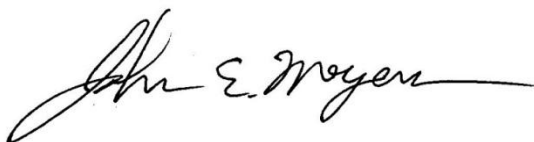
Katherine Nordal, Ph.D.  
Executive Director, American Psychological Association Practice Organization



Grant Iverson, Ph.D., ABPP  
President, National Academy of Neuropsychology



Neil Pliskin, Ph.D., ABPP  
President, Society for Clinical Neuropsychology (APA Division 40)



John Meyers, Ph.D., ABN  
President, American Board of Professional Neuropsychology