

# ANGIE CHEN BUTTON



## The State of Texas House of Representatives

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### RE: Implementation of HB 2598 — Use of the Title “School Psychologist”

September 15, 2025

Dear Members of the Texas State Board of Examiners of Psychologists,

It has come to my attention that TSBEP proposed rules inaccurately interpret the changes made by the bill I authored during the 89<sup>th</sup> Regular Session, **House Bill 2598**, relating to a school psychologist licensed under the Occupations Code. HB 2598 was enacted only to change the title of “Licensed Specialist in School Psychology” to “**School Psychologist**” in Texas. This aligns Texas with widely understood national usage and improves clarity for parents, educators, and the public. However, it does not authorize the use of the title “**Licensed School Psychologist**” as written in the proposed rule. As a result, this proposed rule should be amended.

In 2023, the Behavioral Health Executive Council (BHEC) amended its rules to allow LSSPs to use the title “**School Psychologist**.” The Board’s current draft rules include the term “**Licensed School Psychologist**.” That term does **not** appear in HB 2598 and should not be adopted. Using the term “Licensed School Psychologist” is not an innocuous variation, and poses the following issues:

- Conflicts with the text and intent of HB 2598;
- Risks public confusion by blurring the distinction between **School Psychologist** and **Licensed Psychologist** (a separate credential with separate education and licensing requirements); and
- Undermines consistency in professional nomenclature that protects consumers and preserves the integrity of regulated services.

The Legislature relies on agencies to implement statutes faithfully and without adding terminology the law does not authorize. HB 2598 was deliberately crafted to use “**School Psychologist**.” Adding “Licensed” is an unauthorized extension.

Therefore, at your September 18<sup>th</sup> meeting, I request that you replace all references to “**Licensed School Psychologist**” with “**School Psychologist**” in these proposed rules before adopting them and review any other documentation prepared by the Board so that they are consistent with this terminology.

Thank you for your stewardship of public protection and for ensuring HB 2598 is implemented with fidelity and clarity.

Respectfully,

A handwritten signature in black ink that reads "Angie Chen Button".

Angie Chen Button



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**cc:**

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