

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Sunday, June 08, 2014 6:37:18 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 9:53 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 21:53

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Aaron

Last Name: Robb

Title: Dr.

Organization you are affiliated with:

City: Frisco

State: Texas

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

I am opposed to the recommendations that the governing boards overseeing social workers, LCDCs, LPCs, and LMFTs be decommissioned, replaced with advisory boards, and moved to the Department of Licensing and Regulation.

Any Alternative or New Recommendations on This Agency:

Sunset Review recommendations for the Texas Department of State Health Services advocate for control of the majority of mental health professionals turned over to technocrats rather than clinicians and trained mental health professionals. This is a backwards step in protection of Texas citizens and signals a de-professionalizing of mental health services that will leave our most vulnerable at even greater risk.

I have long advocated combining the various mental health boards into a Behavioral Sciences Administration (much the same way the Texas Medical Board is actually three different boards who share a support staff, see <https://www.tmb.state.tx.us/page/agency>). There are some administrative savings possible, for instance many providers of continuing education for these professionals are credentialed with multiple boards, unnecessarily duplicating work, and often there are multiple boards drafting essentially the same rules, again an unnecessary duplication. Frankly the core of what is considered ethical behavior by mental health professionals does not change simply because of which "guild" one was trained in, so a combination also makes sense from a public protection standpoint. There are certainly going to be some unique needs for each of the professions that would have to be addressed (i.e. regulation of non-clinical services provided by social workers), but that is already happening with the existing boards so it is not a new challenge.

It is almost inconceivable that the Sunset Commission did not recommend either combining the mental health licensing boards or providing better funding to address the clear difficulties with DSHS, and are instead suggesting that mental health services are no more than skilled trades. A decade ago with the review of the Texas State Board of Examiners of Psychologists the Sunset Review staff were unequivocal that mental health professionals serve vulnerable populations and that there are unique provider-client issues to regulate. Ultimately de-professionalizing these boards, and the work they oversee, is penny wise and pound foolish management.

My Comment Will Be Made Public: I agree