

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Comments on Behavioral Health Licensing Board Hearings
Date: Monday, April 30, 2018 7:59:54 AM

From: Abernethy, Catherine
Sent: Saturday, April 28, 2018 12:52 PM
To: Sunset Advisory Commission
Subject: Comments on Behavioral Health Licensing Board Hearings

I am commenting on the Sunset Commission Staff Report and in response to the public hearing on the Behavioral Health Licensing Boards held on Wednesday, April 25, 2018:

- I support the recommendation that the boards regulating LPCs, LMFTs, Social Workers, and Psychologists be housed at the new Texas Behavioral Health Executive Council, as this will create a more efficient and effective structure for all professionals who deliver mental health services in Texas.
- The Texas Behavioral Health Executive Council will not create one combined board for all mental health professionals. Each of the four licensing boards will retain their integrity and rule-making authority for each distinct discipline.
- I support creation of the Texas Behavioral Health Executive Council, but request that the professional members appointed to BHEC by each licensing board have voting privileges on BHEC.
- The Texas Behavioral Health Executive Council is essentially an administrative agency – not a licensing board. It will achieve efficiencies and consistency where appropriate, such as in administrative activities related to applications and investigations.
- The Texas Behavioral Health Executive Council will not be authorized to establish rules. They will review rules but will only be able to reject or send rules back to each board if the rules violate current statutes or create anti-competitive, monopolistic, or anti-trust scenarios.
- Maintaining the status quo or creating two separate administrative agencies for the four mental health licensing boards is NOT the most efficient use of taxpayer dollars. The state's interests are best served by forming ONE agency as recommended in the Sunset Commission Staff Report.
- Holding a doctorate is not unique to psychologists. Many other mental health providers also hold this prestigious degree. This is no reason to have a stand-alone agency for psychologists. In fact, many psychologists are dually licensed by one of the other mental health boards – another reason they should be housed at BHEC.
- With mental health care moving to more integrated care, combining professions on the Executive Board will accommodate this trend more efficiently.

Please keep the Executive Council composed of professional members knowledgeable of the practice of their respective mental health professions and able to competently handle investigations based on clinical experience and professional ethics.

Catherine Abernethy, Ph.D., LPC, NCC, RPT