

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, November 16, 2016 12:11:28 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, November 16, 2016 12:08 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: Julie

Last Name: Almendral

Title: Mental health communications professional & counseling student

Organization you are affiliated with:

Email:

City: Austin

State: Texas

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

I oppose the recommendation to relegate the Texas State Board of Examiners of Professional Counselors (TSBEPC) and the other mental health professional licensing boards (TSBEMFT and the TSBESW) to advisory status under the Texas Department of Licensing and Regulation (TDLR). Licensed professional counselors, marriage and family counselors, and social workers should continue to be regulated autonomously by specialized boards with the correct topical and clinical knowledge, and the bandwidth to properly regulate professionals who play such critical role in the well-being of our society.

The other occupations regulated by the TLDR do not work with fragile individuals struggling to overcome devastating psychological, social, emotional and physical challenges. Their work does not have the same long term impact on the mental health of an individual. In summary, regulating mental health professionals is beyond the scope of the TLDR and also requires more knowledge of the field than simply checking off boxes. A move to TLDR will neither resolve access to care issues and regulatory challenges, not improve clients' outcomes.

I support allocation of licensing fee revenue to directly support the regulatory functions of the Texas State Board of Examiners of Professional Counselors. Issues #2 and #3 would be moot had the Texas Department of State Health Services allocated funds generated by licensing fees to support the regulatory functions of the Texas State Board of Examiners of Professional Counselors as well as the boards that regulate Licensed Marriage and Family Therapists and Social Workers.

TDLR is not equipped to regulate mental and behavioral health professionals.

Expanding the scope of TDLR beyond its mission is likely to adversely impact consumer protection across all the industries it regulates and risk its efficiency.

I support retaining the structure and autonomy of the Texas State Board of Examiners of Professional Counselors as well as the TSBEMFT and the TSBESW.

Setting and enforcing clear, ethical training and practice standards for mental health professionals can only be accomplished by professionally specialized and independent licensing boards. Best practice to protect consumers is to have independent, professionally specialized boards with public members that regulate mental health care.

Any Alternative or New Recommendations on This Agency: No.

My Comment Will Be Made Public: I agree