

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, April 06, 2018 11:05:50 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, April 06, 2018 10:56 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: lilo

Last Name: burda

Title: MS , LPC-Intern

Organization you are affiliated with: ACA , TCA

Email:

City: Corpus Christi

State: Texas

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

As of March 22, 2018, the Board is processing:
Processing may take between 2 to 4 month.

o Initial applications received on 12/1/17 o Responses received on 12/4/17 to notices of deficiencies in initial applications
o License upgrade applications received on 1/10/18 o Responses received on 2/1/18 to notices of deficiencies in license upgrade applications
o Site change forms received on 2/2/18

As current professionals and future professionals we have invested a substantial amount of financial resources in acquiring the qualifications for licensure, yet cannot practice and earn a living for 4 to 6 month due to the current situation with the state board being under staffed, under funded and not a separate licensure entity. Furthermore, there is a shortage of mental health professionals in Texas with its increasing demand for services. the demand has exceeded 1000 individuals in need of mental health services per currently licensed counselor. Since the Texas State Board of Examiners of Professional Counselors, as well as the other behavioral health regulatory boards, is going through a review by Sunset Commission (again), it becomes imperative to pass bill and support the recommendation to organize the regulatory boards for LPCs, LMFTs, SWs and psychologists within a new agency.

reason to support restructuring:

The Structure of the State's Behavioral Health Licensing Agencies is Antiquated and Inefficient.

Key Elements of the Behavioral Health Boards' Statutes, Rules, and Policies Do Not Conform to Common Licensing Standards.

The Psychology Board's Oral Exam Is an Unnecessary Requirement for Licensure.

Requiring a Year of Post-Doctoral Supervision Is an Unnecessary Hurdle to Licensure, Potentially Contributing to the Mental Health Care Provider Shortage in Texas.

Key Elements of the Psychology Board's Licensing and Regulatory Functions Do Not Conform to Common Licensing Standards.

Inefficient licensing practices.

Broken enforcement process.

Failures of administrative attachment.

Any Alternative or New Recommendations on This Agency:

Consolidate the Board of Examiners of Marriage and Family Therapists, Board of Examiners of Professional Counselors, and Board of Social Worker Examiners with the Board of Examiners of Psychologists to create the Texas Behavioral Health Executive Council.

Texas Should Adopt the Psychology Interjurisdictional Compact.

Remove the statutory limitation restricting the board's authority to lower fees.

Remove subjective licensure qualifications.

Remove the requirement for a separate provisional license and instead

authorize the board to grant provisional status to applicants for full licensure.

Authorize the board to provide biennial license renewal.

Authorize the board to issue remedial plans to resolve minor complaints.

Clarify the agency's authority to require physical or mental evaluations and hold related hearings for noncompliance.

My Comment Will Be Made Public: I agree