

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#); [Brittany Roberson](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 06, 2014 11:56:42 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 06, 2014 10:17 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 10:17

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

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Organization you are affiliated with: Christy Bradshaw Schmidt, MA, LPC- Child Custody Evaluator/Expert Consultant

City: Dallas

State: Texas

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

Recommendation 3.2 places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Professional Counselors, which includes licensed professional counselors as well as public members, ensures that all LPCs are well trained and adhere to high professional standards. The impact of LPCs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.

- Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Professional Counselors, Marriage and Family Therapists and Social Workers must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree.

Any Alternative or New Recommendations on This Agency: I believe that 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> ) would be something to consider.

There are some administrative savings possible, and frankly I think the core of what is considered ethical behavior by mental health professionals really shouldn't change simply because of which "guild" one was trained in, so this 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's already happening with the existing boards so it's not a new challenge.

My Comment Will Be Made Public: I agree