

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 11:54:35 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 11:54 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 - 11:54

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Cynthia

Last Name: Doyle

Title: Licensed Professional Counselor

Organization you are affiliated with: Self Employed - Member of Texas Counseling Association

City: Krum

State: Texas

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

Recommendation 3.2 places the public at risk and has the potential to minimize the standards of our profession. The regulation of our profession would be turned over to individuals whose primary experience is with industry and trades as opposed to mental health. Currently, the regulatory oversight provided by the Texas State Board of Examiners of Professional Counselors includes licensed professional counselors as well as public members. This ensures that all LPCs are well trained and adhere to high professional standards. 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. 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. Moving this Board to simply oversee threatens the quality of our profession. In addition, the recommendation is coming without any analysis per page 44. A decision this big with this much impact (on both the public and the profession) deserves to have the time needed to review the merit of changing the current oversight.

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:

Allow the Texas State Board of Examiners of Professional Counselors to remain an independent licensing board housed at the Department of State Health Services.

Allow the review of the Texas State Board of Examiners of Professional Counselors and the other mental health licensing boards be conducted in 2016 as scheduled in current statute.

My Comment Will Be Made Public: I agree