

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Sunday, June 08, 2014 6:34:12 PM

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

From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Friday, June 06, 2014 4:59 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 16:58

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Crystal

Last Name: Graham

Title: Licensed Master Social Worker

Organization you are affiliated with:

City: Waco

State: Texas

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

As per the statement:

. "The rules must be presented in a clear manner that results in a transparent process for the public and the licensees. The current website and lack of staff availability to answer questions does not meet these criteria. Adequate staff and IT funding is critical to a well functioning board."

I have a personal example of the inadequacies of the rules as written thus far by the Board. I was denied a full month of completed clinical supervision by the Board last summer due to not having a clear understanding of the rules put in place by the Board of Social Worker Examiners. I was told that because my submitted dates of supervision were five calendar days short of being a full six months (even though I had worked full time in those six months and had completed the required 24 hours of clinical supervision in that time), I was told I had to complete an additional FULL MONTH of supervision. In total, I have completed 18 months of clinical supervision, but only 17 months have been counted by the Board. I started supervision on Dec 3rd of 2012 as it was the first business day of the month. I had to switch jobs at the end of April, 2013, due to a funding cut at the agency I was currently working at. I had a mandated start date at the end of April. I was told by a member of the Board that I should have placed my submitted dates as 12/01/12 and 4/30/14 in order to be counted for a full six months. Because I submitted the dates as accurately and honestly as possible, I have been "reprimanded" by the Board and had a full month of completed supervision denied. I have appealed this decision by the Board twice, even appearing before the Board for the first appeal. I was given less than a minute to speak (after an incorrect summary of my appeal was given verbally by a member of the Board). The option of "making up" the five calendar days was discussed by the Board during that appeal hearing, and I was in agreement with this. However, it was ultimately decided that this would not be fair for other licensees to grant me the option to make up the five calendar days "missing" from my submitted supervision. I

asked when both appeals were submitted (each appeal was 2-3 pages in length) for proof as to where it is written in the rules specifically stating where I was at fault and was not given an answer either time; verbally and in writing I have always been told simply "it's in the rules". I was also told by a Board staff member that my situation was very common and the rules were going to be re-written to better clarify rules and regulations when submitting dates for approval. I have made many, many phone calls to the Board and submitted lengthy appeals regarding this difficult situation. However, I, a licensee who has paid for and completed a full 18 months of clinical supervision, am now stuck completing and paying for an additional full month of clinical supervision due to no known error on my part; and the Board has thus far been unable to provide me with evidence of error on my part as written in the rules set forth by the Board of Social Work Examiners; only verbal feedback. I believe this Board is a currently a disgrace to this field and does not advocate for or work for resolution with its licensees when there is a discrepancy/disagreement between the two parties. The Board of Directors is one of the most disrespectful people I have ever encountered and is a very closed-minded individual. I have spoken with other licensed social workers who have had to complete additional months of supervision due to errors made stemming from vague and non-descriptive rules and regulations as set forth by the Board of Social Work. This needs to change; not only for myself but for other hard working licensees who are working diligently to work towards gaining their clinical licenses. We are being held back and forced to complete additional months of clinical supervision when there are no clearly written or transparent rules stating in explicit detail the errors we are making on our submitted clinical supervision forms. I have read the rules of the Board multiple times over the last year and a half, and can still not find anything that would have changed the format in which I submitted my dates of supervision. My clinical supervisor, who is approved by the Board to supervise licensees even signed off on the dates as being correct to the best of her knowledge for approval by the Board for the six months submitted. We, as licensees, should be able to put our full faith and trust in the Texas Board of Social Work Examiners.

However, I can most definitely state that I have zero trust in them and if I weren't licensed and regulated by the Board I would stay as far away from them as I could. THIS SHOULD BE A RED FLAG!!! In the field of social work, a passion for advocating for your clients is a must. I also feel that we should also be able and willing to advocate for ourselves if necessary. I hope that this plea is heard and responded to appropriately; and the pleas of other licensees who feel they have been wronged by the Texas State Board of Social Work Examiners.

Any Alternative or New Recommendations on This Agency: Rules set forth by the Board need to be more transparent and clearly written; as evidenced by the fact that many licensees are being denied months of clinical supervision due to lack of understanding of the dates being correctly submitted to the Board. Also, when a licensee appeals their case in person, they should be given an appropriate amount of time to speak their case, not told that they aren't allowed to say anything else after only being given a minute to speak. Many of us drive a long distance to appeal before the Board and should be given the appropriate time and respect deserved as well as be treated as equals and professionals. I felt very humiliated and degraded at my initial appeal hearing; that is unacceptable. The Executive Board of Directors is very unprofessional and disrespectful. However, I've been told that she is taking another position so that may not be an issue in the near future. Any future person that holds that position should have the background and skills necessary to complete their duties and be able to work within their scope of practice. They should also be able to maintain a professional and respectful demeanor in all communications with licensees.

My Comment Will Be Made Public: I agree