

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, November 15, 2016 11:55:55 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, November 15, 2016 11:55 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: Paul

Last Name: Carrola

Title: Assistant Professor

Organization you are affiliated with:

Email:

City: El Paso

State: Texas

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

I am opposed to transferring the LPC board to the Health Professionals division of TDLR. I believe that many of the concerns cited by the review (i.e., unacceptable wait times and backlogs) are due to insufficient funding rather than ineffective management.

I am opposed to abolishing the boards complains and ethics committees I support requiring fingerprint-based criminal background checks I support checking disciplinary actions from other state boards I support expedited processing for Military applications

The regulation of training, practice and ethical standards should fall on boards that are comprised of members with professional experience directly connected to the profession they are responsible for regulating. The professions of Social Work and Counseling specifically have evolved over time as distinct professions with specific training and practice standards. If it is the intent of the Sunset Commission to merge mental health professions (which is what their recommendations would partially effect); it would be more appropriate to include all mental health professions under one board and re-write the laws to align their training and practice standards. While this may seem ideal in some ways (and perhaps may been practical 50 years ago), it is impractical at this point in our history as the mental health professions have evolved to meet specific needs and have developed distinct professional identities and standards.

There were some other comments made in the report about board members engaging in "public shaming" during complaints hearings. If the board feels this way, then it should be addressed as a personnel issue rather than an issue that requires transferring and merging the board. If the commission feels that individual board members behavior is inappropriate, it would seem that individual action should be taken to address that board members behavior.

Any Alternative or New Recommendations on This Agency:

Retain the structure and autonomy of the Texas State Board of Examiners of Professional Counselors.

Allocate licensing fee revenue to directly support the regulatory and management functions of the Texas State Board of Examiners of Professional Counselors.

My Comment Will Be Made Public: I agree