

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, November 15, 2016 7:48:49 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, November 14, 2016 9:25 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: Joanne

Last Name: Christian

Title: President

Organization you are affiliated with: Texas Mental Health Counselor Association

Email:

City: Mt. Pleasant

State: Texas

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

The Texas Mental Health Counselor Association (TMHCA) does not support the Sunset Advisory Commission staff report to move the Texas State Board Examiners of Professional Counselors to the TDLR.

TDLR has no experience with mental health/behavioral health providers. There is no data supporting their ability to oversee a profession that works with individuals who are struggling with physical, social, emotional, and/or mental health issues. Moving Professional counselors to TDLR will not improve the quality of care nor will it resolve the regulatory challenges/issues that exist. It is beyond the scope of TDLR to have oversight of mental health boards.

TMHCA opposes the recommendation to make the mental health board an advisory board. The TDLR is over-extended with the number of occupations it regulates. The TSBEP, as well as the other mental health boards, should remain autonomous.

TDLR is not equipped to oversee/regulate mental health boards. Doing so is beyond the scope of TDLR's mission and could negatively impact the consumers of mental health services as well as all occupations it currently regulates. There is also a risk of decreased efficiency for the TDLR.

Regarding issues #2 and #3, these would be a moot point had the Texas Department of State Health Services allocated licensing fees generated by Licensed Professional Counsels to directly support the functions of the TSBEP as well as the other two mental health boards.

TMHCA supports retaining the current structure and autonomy of the Texas State Board of Examiners of Professional Counselors. Ethical training and practice standards for mental health providers/professionals can only be achieved by specialized, independent and professional licensing boards. The best protection consumers can have

is for mental health providers to be regulated by professionally specialized and independent boards that include public members.

Any Alternative or New Recommendations on This Agency:

Create a task force of professional counselors with the purpose of designing a penalty matrix to ensure a level of consistency with violation enforcement.

This can be accomplished by leaving the mental health boards under DSHS.

My Comment Will Be Made Public: I agree

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, November 14, 2016 10:13 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: Joanne

Last Name: Christian

Title: Owner

Organization you are affiliated with: Lighthouse Counseling Services, PLLC

Email:

City: Mt. Pleasant

State: Texas

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

As an independent, Licensed Professional Counselor-Supervisor in private practice, I oppose the recommendations and adoption of the Sunset Advisory Commission staff report to move the Texas State Board of Examiners of Professional Counselors to the TDLR. Recommendations listed in the report can be implemented by the DSHS/HHSC.

Counselors, as well as Licensed Marriage and Family Therapists and Social Workers, should be regulated by independent boards rather than the over-extended TDLR. Professionals should be regulated by peers within the same profession.

TDLR regulation of mental health professionals is outside the scope of their mission as well as the department being over-extended. TDLR is not equipped for the oversight of professionals who work with emotionally, mentally, fragile and/or physically impaired individuals who are trying to cope with devastating circumstances/events in their lives. Moving the mental health board will not provide greater access to or improved care to consumers.

I support retaining the structure of and autonomy of TSBEP. Setting ethical practice standards and training requirements for Licensed Professional Counselors necessary to protect consumers is best achieved by independent specialized boards with public members.

Had DSHS allocated licensing fee revenue to support the regulatory functions of TSBEP, issues #2 and #3 would be moot points.

Any Alternative or New Recommendations on This Agency: Create a task force of professional counselors to design a matrix to help ensure consistency and equality in the sanctions resolution process.

My Comment Will Be Made Public: I agree