

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, December 05, 2016 4:36:11 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, December 05, 2016 4:30 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: Cory

Last Name: Clark

Title:

Organization you are affiliated with: Licensed Professional Counselor (State of Texas, #67615)

Email:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: After reviewing the Executive Summaries of both the Sunset Review of the Texas State Board of Examiners of Professional Counselors and the Health Licensing Consolidation Project, and as a current Licensed Professional Counselor with the State of Texas, I have come to the conclusion that I am in agreement with the findings that no discernible professional or public benefit has resulted from entrusting existing enforcement authority to the TSBEP. Reassigning the regulatory duties of the Board would allow for another authority (such as the TDLR) to create and enforce standards in a more consistent (if not more efficient) manner that the current structure allows for. It has been my perception as a licensee that the Board is increasingly focused upon regulating and restricting the opportunities of more-recently licensed professionals, as evidenced by many of the proposed rule changes adopted effective July 14, 2016. These include restrictions and standards out of line with those found in nearby states and nationally.

Similarly, rule changes feel to be to the potential benefit of private practitioners versus those such as myself who have largely elected to practice counseling in an agency setting. Meetings of the Board have regularly been held at times that are prohibitive for employed licensees who reside out of the immediate geographic vicinity of Austin to attend or participate in. If the objectives as stated in the Executive Summary of the HLCP - increased efficiency and greater objectivity in the rulemaking and enforcement processes - can be achieved by transferring authority to the TDLR, then I am in support of those outcomes.

Any Alternative or New Recommendations on This Agency: Although I am skeptical that a transfer of regulatory authority to the TDLR would prove to address some of the flaws in the current system, I cannot defend the current performance of the TSBEP as acceptable, either. I believe a more clear distinction between advisory and investigatory/enforcement bodies would likely increase the quality of counseling services, less through the Board's current strategy of piecemeal rule-changes, and more through promotion of better standards of practice, as is appropriate. I would also strongly advocate for increased diversity in the TDLR Advisory Board composition relative to the current makeup of practitioners on the TSBEP.

My Comment Will Be Made Public: I agree