

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 8:12:29 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, November 13, 2016 5:51 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: Greta

Last Name: Davis

Title: Clinical Assistant Professor

Organization you are affiliated with: Southern Methodist University

Email: gretad@smu.edu

City: Richardson

State: Texas

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

I am writing to encourage the legislature to continue the autonomous regulation of the licensed professional counselors, marriage and family counselors, and social workers in the State of Texas. I strongly oppose the recommendation to relegate the Texas State Board of Examiners of Professional Counselors and the other mental health professional licensing boards to advisory status under the Texas Department of Licensing and Regulation (TDLR). The oversight of mental health professionals is well beyond the scope of the TDLR. None of the occupations regulated by TDLR work with fragile individuals struggling to overcome devastating psycho, social, emotional and physical challenges. I cannot conceive how a move to TDLR will resolve access to care or regulatory challenges.

It is my contention that the problems associated with untimely responses to complaints and back logs of administrative responsibilities at the board is a result of under-funding. As a Licensed Professional Counselor I expect that the fees I pay as a professional will go to the board tasked with overseeing our profession. It is my understanding that those funds generated are allocated to the state. As the number of professional counselors, marriage and family therapists and social workers increase in the state of Texas so should the budget allocation and personnel charged with regulating our profession. The solution to these problems is to allocate the licensing fee revenue directly to support the regulatory functions for the Texas State Board of Examiners of Professional Counselors.

It is my viewpoint that TDLR is not equipped to regulate mental and behavioral health professionals. Expanding the scope of TDLR beyond its mission is likely to adversely impact consumer protection across all the industries it regulates and risk its efficiency.

Any Alternative or New Recommendations on This Agency:

I strongly encourage you to retain the structure and autonomy of the Texas State Board of Examiners of Professional Counselors as well as the TSBEMFT and the TSBESW but fund them appropriately so they can fulfill their

regulatory responsibilities. The administrative staff is simply overwhelmed by the volume of administrative tasks associated with regulating mental health licenses in Texas. Setting and enforcing clear, ethical training and practice standards for mental health professionals can only be accomplished by professionally specialized and independent licensing boards. The best practice to protect consumers is to have independent, professionally specialized boards with public members to regulate mental health care.

My Comment Will Be Made Public: I agree