

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 30, 2018 8:00:32 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Saturday, April 28, 2018 10:28 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: 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 commenting on the Sunset Commission Staff Report and in response to the public hearing on the Behavioral Health Licensing Boards held on Wednesday, April 25, 2018. I support the recommendation that the boards regulating LPCs, LMFTs, Social Workers, and Psychologists be housed at the new Texas Behavioral Health Executive Council. This will create needed efficiency for all professionals who deliver mental health services in Texas. At the recent hearing Psychologists reported concerns about their autonomy and that they want a stand alone entity. Their comments were based on incorrect information. The Texas Behavioral Health Executive Council will not create one combined board for all mental health professionals. It is my understanding that each of the four licensing boards will retain their integrity and rule-making authority for each distinct discipline. The Texas Behavioral Health Executive Council is an administrative agency – not a licensing board. It will achieve efficiencies and consistency where appropriate, such as in administrative activities related to applications and investigations. Psychologists and all the other disciplines will have authority to create their own rules. Also, while psychologists are licensed at the doctoral level, many mental health professionals, including myself, hold earned doctoral degrees in counseling, marriage and family therapy or social work. Also, many mental health professionals, including psychologists are dually licensed by one of the other mental health boards – another reason they should be housed at BHEC. Thank you for your consideration.

Any Alternative or New Recommendations on This Agency: I am commenting on the Sunset Commission Staff Report and in response to the public hearing on the Behavioral Health Licensing Boards held on Wednesday, April 25, 2018. I support the recommendation that the boards regulating LPCs, LMFTs, Social Workers, and Psychologists be housed at the new Texas Behavioral Health Executive Council. This will create needed efficiency for all professionals who deliver mental health services in Texas. At the recent hearing Psychologists reported concerns about their autonomy and that they want a stand alone entity. Their comments were based on incorrect information.

The Texas Behavioral Health Executive Council will not create one combined board for all mental health professionals. It is my understanding that each of the four licensing boards will retain their integrity and rule-making authority for each distinct discipline. The Texas Behavioral Health Executive Council is an administrative agency – not a licensing board. It will achieve efficiencies and consistency where appropriate, such as in administrative activities related to applications and investigations. Psychologists and all the other disciplines will have authority to create their own rules. Also, while psychologists are licensed at the doctoral level, many mental health professionals, including myself, hold earned doctoral degrees in counseling, marriage and family therapy or social work. Also, many mental health professionals, including psychologists are dually licensed by one of the other mental health boards – another reason they should be housed at BHEC.

Thank you for your consideration.

My Comment Will Be Made Public: I agree

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, April 06, 2018 3:53:14 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, April 06, 2018 3:33 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 support the recommendation to organize the regulatory boards for LPCs, LMFTs, SWs and psychologists within a new agency, the Behavioral Health Executive Council. The BHEC should be comprised of one public member from each of the Boards with one professional member from each Board serving only in "ex officio" roles. Including a professional representative from each of the Boards will provide expertise and is more likely to enhance consistency in professional standards rather than interference across professions. BHEC would still be a public majority agency, since the Governor will appoint a non-professional to serve as its presiding officer.

I hope a new BHEC will create efficiencies. I'm frustrated with the inefficiencies of the current LPC board. I have many students who are waiting months for initial temporary licensure. The agency has not kept up with the growing numbers of professional counselors in Texas. I believe there are 22,000+ LPCs in Texas, and the board is not allocated enough resources to manage the complaints and administrative processing. Citizens of Texas are at risk because the board is not operating efficiently. Complaints aren't resolved in a timely manner, and new professionals who could presumably be serving Texas residents are delayed in their applications processing. Again, I'm really hoping an adequately funded BHEC would be able to have a more efficient board.

Any Alternative or New Recommendations on This Agency: A reassessment of how the licensing fees of LPCs (another mental health professionals) are reallocated back to the governing board. The resources should increase commensurate with increases in the number of professionals who licensed.

My Comment Will Be Made Public: I agree