

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, April 04, 2018 11:33:57 AM

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, April 04, 2018 11:33 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD SOCIAL WORKER EXAMINERS

First Name: Anna

Last Name: Escamilla

Title: Social Work Program Director

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City: Austin

State: Texas

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

To Whom It May Concern:

I am opposed to the recommendations by the sunset commission to combine what they perceive as four types of licensures that treat mental illness. I am not qualified to address the issues of each type of licensure, but I am an expert in the area of social work mental health practice due to my 40 years plus experience as a social worker, 12 years as a social work professor in higher education, and #02797 licensed clinical social worker in the state of Texas.

In addition, I have worked very closely with psychologist and will address some of this to the impact it will have on psychologist.

The history of social work in the United States can be traced to the early 20th century and social work education to approximately 1930's. The profession originally struggled to be regarded as a mental health profession due to the lack of understanding of what social workers do and how they are educated. Since then, social work education has taken even more steps to ensure that what social work students were receiving in their education was equal to what the discipline of psychology and, to some degree, medicine were receiving in their education. The Council on Social Work Education has been able to solidify what is the practice of social work and how social worker students enrolled in CSWE accredited programs will be educated on a national level. They have worked for many years and continue to work with clinical social workers and educators to keep up with current standards of practice in all areas of social work including mental health. Therefore, graduates of CSWE accredited programs are clearly qualified for licensure anywhere in the country at the level equivalent to their level of education.

Social work education begins with a generalist approach to practice that includes ecosystem, functionalist, and conflict theories among others. The systems theories serve to provide a strong base whereby social workers practice with individuals, families, groups, communities and organizations.

This generalist level of education is what provides the basis for all social work. In addition, students who are interested in treating mental illness are provided with specific education regarding mental health treatment including theoretical underpinnings found also in psychology and psychiatry. They also operate under the National

Association of Social Work's Code of Ethics which is updated to meet the demands of a modern society. The current licensure allows for the varying types of qualified knowledge base as applied in a clinical mental health environment. In addition, continuing education requirements make it possible for social work practitioner to update their knowledge base as treatment advances are made throughout the treatment of the mentally ill. While the application of counseling techniques may be utilized throughout their education, social workers are skilled beyond these techniques to treat mental illness.

Psychologist have been recognized as practitioners of mental health treatment for decades. They too receive an intensive education in theory as well as practice. Like social work, the long history of treatment of the mentally ill has proven them to be qualified to practice under a specific code of ethics that governs the practice of psychology. The efficiency recognized by you is due to years of serving as one of the first licensed professions in the country. It is not something that can serve as a cookie cutter when applied to other disciplines.

There are many types of educational preparation for Licensed Professional Counselor and Marriage and Family Counselors. Therefore, this would make it impossible to get efficiency from combining with Social Work and Psychology due to the complexity of varying preparation for licensure including ethical preparation. It is likely that combining all these will, in fact, make it more cumbersome for the consumer who does not understand the above factual information I have stated. Looking at the complaint case backlog estimates, it is clear that there twice as many more LPC complaints than Social Work. I believe that it is the lack of educational preparation which is reflected in the number of LPC cases, not the lack of hearing officers. There is backlog on each, but not as much for social work. There are fewer MFT's, so that number is in keeping with the number of licensees. Hearings for these will still have to include individuals that are knowledgeable in all 4 licensing areas. This just mean more numbers and diluted focus on the most pertinent issues.

I agree with the following statements. "Stakeholders expressed misgivings about the ability of each profession to vote objectively on standards of practice and licensing and enforcement decisions of the other professions."(p.28 Behavioral Health Boards Staff Report, Issue I, 2018-19). It may seem more efficient, but less considerate of the reason that licensing exists, which is to regulate the professional practice of each area.

I recommend that clerical staff be added to both Psychology and Social Work licensing boards to assist with administrative functions. I know that as Psychology continues to be a strong discipline, there are many psychologists who are qualified and able to serve on the board as others are retiring. The social work board could also stand to get new board members that are less concerned about petty issues, such as licensing social work professors, and more dedicated to serving the public with high standards and quality of service.

I further recommend that there be review of the LPC and MFT licenses so as to narrow down those who are qualified to deliver ethical mental health services and those that are not prepared to do so. Rather, than try to assess educational qualifications on a case by case basis, develop criteria that will qualify or disqualify those taking exams by the education they have received. Thereby, you are putting the responsibility of educational preparation on institutions of higher education or on Accreditation Boards, not on the licensing boards.

Thank you for allowing me to be part of this discussion. I am ready to offer any additional information to you in the future, regarding this very important decision.

Sincerely,

Anna Escamilla, Ph.D, LCSW #02797

St. Edward's University Social Work Program Director Associate Professor of Social Work

Any Alternative or New Recommendations on This Agency:

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My Comment Will Be Made Public: I agree