

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, April 10, 2018 12:11:47 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, April 10, 2018 12:12 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: Liz

Last Name: Gautreau

Title:

Organization you are affiliated with:

Email:

City: Heath

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Thank you for your hard work.

Any Alternative or New Recommendations on This Agency:

I'm excited about the the oversight work of the Sunset Commission and it's promise of a strong foundation for the services we provide to the public.

I am not sure this is the type of input you are soliciting from the public, but I would like to offer the following for your consideration.

I would like to recommend that special attention and discussion be focused on the boundaries and standards of practice of state licensed psychologists, social workers, LPCs, LMFTs, and LCDCs practicing in in-house church or across-the-street church counseling centers funded by a church or a church-acting agency.

Jcaho is an agency that credentials the programs and services offered to the public, but to my knowledge, there is no such oversight or standard of care agency for behavioral health clinics or centers housed or associated with or in churches.

I would ask the Committee to consider stating clear boundaries and ethics as there is the potential of having state-licensed practioners providing individual, marriage or family counseling to fellow church employees, those in their chain-of-command, spouses and families of their fellow therapists, fellow Sunday school participants, and other church attendees. If these centers or clinics consider the counseling clinic or center an EAP, I would ask for clarity between the roles and obligations of a pastor, pastoral staff, pastoral counselor, psychologist, professional counselor or other therapist.

I would also like to recommend a review of what could potentially be called a church support group that provides

behavioral therapy without the proper assessment, intake and charting or standard of care - particularly trauma-related groups.

I would also recommend that your consideration be given to clarifying dual church and state credentialing. Please provide guidance on the potential that a church might provide dual credentialing of a state licensed professional with an ordination or pastor designation that blurs the lines between church authority and state authority and obligations of that state licensed practitioner to its church client.

I would recommend that the committee consider any possible conflict of interest inherent between church authority and state obligation to protect the public's safety from any mishandling of power differentials.

Should there be more definitive ethics for this unique situation to protect the public from conduct that might be contrary to state law or ethics but sanctioned by church authority?

Should there be an accreditation process for in-house or church-based centers employing state licensed practitioners?

I hope the Sunset Commission will discuss this issue and provide clarity and guidance across all behavioral health areas. Variance in this matter, in my opinion, is confusing.

Thank you.

My Comment Will Be Made Public: I agree