

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, April 06, 2018 1:21:44 PM

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, April 06, 2018 1:13 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: Royce

Last Name: George

Title: Senior Lecturer

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City: Denton

State: Texas

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

I was awarded my License as a Professional Counselor on April 3, 1991 (10525) and became an LPC Supervisor on September 30, 2004. I have worked as a counselor in the public schools; in private practice; in a mental health agency; in foster care; and in a clinical hospital setting providing assessment, treatment, counseling support and behavioral health interventions. I support the creation of a Behavioral Health Executive Council to provide oversight for all four of the behavioral health regulatory agencies and to expand the composition of the BHEC to include professional representation from each of the four boards as voting members of the council.

Any Alternative or New Recommendations on This Agency: I disagree with the Sunset Staff recommendation for the Behavioral Health Executive Council composition and authority. I would prefer that the BHEC be structured as proposed during the last Sunset Review to include one professional and one public member appointed by each board with the presiding officer, a public member, appointed by the Governor. This structure will effectively address concerns involving the protection of the state's immunity from restraint of trade claims and will also protect against any anti-competitive rule making from the independent boards. Each of the four behavioral health boards would have full rule making authority over scope of practice, qualifications and training. BHEC would have authority to review and approve or reject rules promulgated by the independent licensing boards to ensure that they are consistent with statutes, are not anti-competitive, do not result in restraint of trade, or cause monopoly concerns. Inclusion of one professional member from each of the respective licensing boards helps to ensure that professional expertise is reflected in BHEC's decisions. This model has proven to be very effective for other regulatory entities such as the Occupational Therapy and Physical Therapy Executive Council.

My Comment Will Be Made Public: I agree