

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, April 10, 2018 8:02:43 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, April 10, 2018 7:59 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: Heather

Last Name: Goltz

Title:

Organization you are affiliated with: Capstone Connect, PLLC

Email:

City: Houston

State: Texas

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

As a member of NASW/NASW Texas:

- + I support the creation of the BHEC through the transformation of the psychology board
- + I oppose the classification of professional appointees on the BHEC as
+ ex officio members
- + The TSBSWE is not operating efficiently and effectively under HHSC; it
+ must have more money to operate efficiently
- + Each board must remain independent under the BHEC

As a LMSW in the State of Texas:

I fully support a review of current TSBSWE/State of Texas policies and procedures concerning the transition from LMSW to LCSW credential in Texas.

Although it addressed issues with LPC and LMFT, the Sunset Commission report did not address 1) policy and procedural issues preventing LMSW from efficiently transitioning to LCSW (e.g., roles/responsibilities, settings, etc.); and 2) discrepancies between policies defining clinical practice and available clinical employment opportunities for non-clinical LMSW attempting to transition to LCSW.

Additionally, given that much of the State of Texas is designated as having behavioral/mental health provider shortages, the Commission would be wise to reconsider policies and procedures that limit clinically-supervised LMSW from being added to insurance panels or otherwise engaging in direct clinical practice. A clinically-supervised LMSW is a professional who has completed a CSWE-accredited MSW degree program, several hundred hours of field internship, and passed both the State's Jurisprudence exam and the national masters-level social work

licensure exam. This professional has also successfully filed a clinical supervision plan with the TSBSWE containing an application form; clinical job description including minimum number of clinical practice hours per week and setting (versus non-clinical); number of hours and format of clinical supervision per month; letter from on-site supervisor if different from clinical supervisor, when applicable; and license information for both the LMSW and their LCSW-S (state licensed clinical social work supervisor). They must complete 3,000 hours of supervised practice and 100 hours of supervision prior to applying for the LCSW credential and passing the clinical social work exam; however, they are, in fact and deed, performing clinical social work. This is work for which they cannot bill through insurance panels and often accept lower compensation and perform pro bono work. The complexity of the rules governing transition from LMSW to LCSW likely exacerbate the already large discrepancy between numbers of LMSW and LCSW in the State versus other behavioral health professionals with multiple licensure levels noted in the Commission's report. I fully support the Commission performing a separate social work-specific assessment and providing recommendations for public comment within the next calendar year.

Any Alternative or New Recommendations on This Agency: + The BHEC should be made up of nine voting members – one public and one professional from each of the four boards, with a final public member appointed by the Governor.

My Comment Will Be Made Public: I agree