

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, April 09, 2018 2:02:02 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, April 09, 2018 1:39 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

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

I am an LPC and am a member of the American Counseling Association (ACA), the world's largest organization representing professional counselors in various practice settings.

ACA and the Texas Counseling Association (TCA) support the Texas Sunset Commission findings that the boards are acting in good faith and have made notable strides in addressing the previously identified problem. However, significant problems and challenges remain that cannot be resolved within the current structure and the continued administrative attachment of the marriage and family therapy, professional counseling and social work boards to a large agency is still not working. The dysfunction created by such a model places the livelihoods of licensees in jeopardy and puts the public at risk.

ACA and TCA support the following Sunset Commission staff recommendations:

The consolidated agency [TSBEMFT, TSBEP, TSBSWE and TSBEP] structure of the Behavioral Health Executive Council presents the best approach to align the regulation of these behavioral health professions and elevate the attention and oversight of these programs. More efficient and effective regulation of these professions will not only provide improved services and increased responsiveness to licensees but also will better protect behavioral health care consumers.

ACA and TCA disagree with the following Sunset Commission staff recommendation:

The executive council would be composed of one public member appointed by each of the four boards and an independent presiding officer appointed by the governor.

Including professional members on the BHEC is much more likely to enhance consistency in standards of practice,

licensing and enforcement decisions because no single profession would hold a majority on the BHEC."

**Any Alternative or New Recommendations on This Agency:** We recommend that the structure of the BHEC, as proposed during the last Sunset Review, include one professional and one public member appointed by each board, with the presiding officer appointed by the Governor. Currently, no board that regulates health professionals in Texas is composed exclusively of public members. In fact, the Sunset Commission staff recommendations for the Board of Medical Examiners do not propose to restructure that Board to create an all or majority public member structure.

My Comment Will Be Made Public: I agree