

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Roberson](#); [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, June 05, 2014 1:35:29 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 05, 2014 1:35 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 5, 2014 - 13:34

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Howard

Last Name: Gruetznier, M.Ed., LPC

Title: Education and Family Care Specialist

Organization you are affiliated with: N. Central Tx Chapter- Alzheimer's Association

City: Waco

State: Texas

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

Recommendation 3.2 places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Professional Counselors which includes licensed professional counselors as well as public members ensures that all LPCs are well trained and adhere to high professional standards. The impact of LPCs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.

Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Professional Counselors, Marriage and Family Therapists and Social Workers must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree.

This is passing the buck rather than solving problems. My fear is that the professional standards of services and client contact will deteriorate at a time when more and more professionals are needed to respond to the growing populations of Texans with needs that by being ignored for so long are being recognized as a big problem. The three professional areas hit by 3.2 would endanger who and what is available more.

Any Alternative or New Recommendations on This Agency: none today

My Comment Will Be Made Public: I agree