

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 30, 2018 7:58:24 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, April 29, 2018 2:33 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 commenting on the Sunset Commission Staff Report and in response to the public hearing on the Behavioral Health Licensing Boards held on Wednesday, April 25, 2018.

I support the recommendation that the boards regulating LPCs, LMFTs, Social Workers, and Psychologists be housed at the new Texas Behavioral Health Executive Council, as this will create a more efficient and effective structure for all professionals who deliver mental health services in Texas.

The Texas Behavioral Health Executive Council will not create one combined board for all mental health professionals. Each of the four licensing boards will retain their integrity and rule-making authority for each distinct discipline.

I support creation of the Texas Behavioral Health Executive Council, but request that the professional members appointed to BHEC by each licensing board have voting privileges on BHEC.

Under the Texas Behavioral Health Executive Council, each board will still be appointed by the Governor as currently set forth in the Occupations Code.

Each board's rule-making authority will remain intact and licenses will be issued by each Board – not by BHEC.

The Texas Behavioral Health Executive Council is essentially an administrative agency – not a licensing board. It will achieve efficiencies and consistency where appropriate, such as in administrative activities related to applications and investigations.

The Texas Behavioral Health Executive Council will not be authorized to establish rules. They will review rules but will only be able to reject or send rules back to each board if the rules violate current statutes or create anti-

competitive, monopolistic, or anti-trust scenarios.

Maintaining the status quo or creating two separate administrative agencies for the four mental health licensing boards is NOT the most efficient use of taxpayer dollars. The state's interests are best served by forming ONE agency as recommended in the Sunset Commission Staff Report.

Holding a doctorate is not unique to psychologists. Many other mental health providers also hold this prestigious degree. This is no reason to have a stand-alone agency for psychologists. In fact, many psychologists are dually licensed by one of the other mental health boards – another reason they should be housed at BHEC.

There should be just one agency to handle the administration of all the mental health professional licensing boards. This model will make it easy for the public to both find providers and learn how to file complaints when necessary.

Any Alternative or New Recommendations on This Agency: Creation of the Texas Behavioral Health Executive Council was recommended unanimously by the last Sunset Commission. The bill to create BHEC passed unanimously from the House Public Health Committee because it is a great, strong design that will best serve Texas.

My Comment Will Be Made Public: I agree