

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 4:12:58 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, November 14, 2016 4:13 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD SOCIAL WORKER EXAMINERS

First Name: Adam

Last Name: MacDonald

Title: LMSW

Organization you are affiliated with: NASW

Email:

City: Austin

State: Texas

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

Regarding Issue 1, Oversight of mental health professionals is beyond the scope of TDLR. None of the occupations regulated by TDLR work with fragile individuals struggling to overcome devastating psycho, social, emotional and physical challenges. Yes, some are healthcare professionals, but these professionals have different working relationships with the public. Our profession requires a specific educated understanding of mental health and the person in the environment. A move to TDLR will not resolve access to care or regulatory challenges, as transparency is the key issue, not the physical location of the applications/complaints.

Regarding Issue 3, Key Elements of the Behavioral Health Boards' Statutes, Rules, and Policies Do Not Conform to Common Licensing Standards, it is not discussed enough how variable the Board of Social Work Examiners is when evaluating supervision plans for LCSW applications. Nor are denied supervision plans for LCSW given reasons why their application as denied.

For example, some individuals who work at the exact same facility performing the exact same role (for example, Seton Shoal Creek Social Workers) are approved while others are denied for the exact same supervision plans without explanation why. This is ludicrous. To protect the public, it is essential that the reasons for denying LCSW application supervision plans be expressly written.

Any Alternative or New Recommendations on This Agency: There MUST be an online component to submitting documentation. The State Board of Social Work Examiners lost sensitive documentation multiple times even when applicants were given documents stating the board received these documents. These important documents are unable to be found; they are being physically lost by the Board. With an online component, letters can be sent electronically and faster communication can be made.

My Comment Will Be Made Public: I agree