

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 30, 2018 7:59:15 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Saturday, April 28, 2018 3:22 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: Gay

Last Name: McAlister

Title: Director, Program in Counseling, Ph.D.

Organization you are affiliated with: Southern Methodist University

Email: gmcalist@smu.edu

City: Dallas

State: Texas

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

Thank you for the opportunity to comment on the latest Sunset Review findings. I am a licensed professional counselor supervisor and counselor educator with a doctoral degree with the following professional investment:

- Teach, supervise, and train LPC and LMFT professionals and School Counselors who will provide services to children, adolescents, and families
- Served as past professional member of the Texas State Board of Licensed Professional Counselors

• Currently belong to Texas Counseling Association, Texas School Counseling Association, and the American Counseling Association In short, I am very invested and have a deep love for my profession and the good work we do.

I agree with your finding that the continued administrative attachment of the marriage and family therapy, professional counseling and social work boards to a large agency is still not working. They are underfunded and understaffed. The dysfunction created by such a model places the livelihoods of licensees in jeopardy and puts the public at risk.

I support the staff recommendation that the consolidated agency [TSBEMFT, TSBEPC, 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 and that 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.

I disagree with the staff recommendation that 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. I believe you should follow Texas Counseling Association's recommendation that the structure of BHEC, as proposed during the last Sunset Review, should include one professional and one public member appointed by each board, with the presiding officer appointed by the Governor. My opinion is based on the following:

- None of the boards that regulate health professionals is composed exclusively of public members. In fact, the Sunset Commission staff recommendations for the Board of Medical Examiners does not propose to restructure that Board to create an all or majority public member structure.
- The original recommendation for BHEC still creates a public majority board. Including professional members brings expertise that would likely be lost if BHEC was composed of public members with professional members relegated to “ex officio” roles.
- The behavioral health regulatory boards currently housed at HHSC work collaboratively with respect for the uniqueness of each specialization. This is evidenced by their implementation of consistent disciplinary matrices and alignment of rules where appropriate.
- Including professional members on BHEC is much more likely to enhance consistency in standards than interference on standards of practice, licensing and enforcement decisions since no profession would hold a majority on BHEC.

Thank you for the opportunity to record my comments about this very important issue.

Respectfully,
Gay McAlister

Any Alternative or New Recommendations on This Agency: See comments above.

My Comment Will Be Made Public: I agree

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 09, 2018 1:03:12 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, April 09, 2018 12:08 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: Gay

Last Name: McAlister

Title: Licensed Professional Counselor Supervisor

Organization you are affiliated with: Southern Methodist University

Email:

City: Dallas

State: Texas

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

"I am a licensed professional counselor supervisor, a member of the American Counseling Association (ACA), the world's largest organization representing professional counselors in various practice settings, and a member of the Texas Counseling Association.

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 problems...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."

Any Alternative or New Recommendations on This Agency:

Both ACA and TCA 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.

I feel strongly that a public member will not understand or appreciate the nuances of the LPC professional code of ethics and the state laws that govern licensure and ensure integrity to the public.

Thank you,

Gay McAlister, Ph.D., LPC-S

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."

My Comment Will Be Made Public: I agree