

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, November 14, 2016 9:21:18 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, November 14, 2016 8:50 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS PROFESSIONAL COUNSELORS

First Name: Levi

Last Name: McClendon

Title: Assistant Professor of Counseling

Organization you are affiliated with: Sam Houston State University

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City: Huntsville

State: Texas

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

Opposed to Texas State Board of Examiners of Professional Counselors and the other mental health professional licensing boards moving to advisory status under the over-extended Texas Department of Licensing and Regulation.

Any Alternative or New Recommendations on This Agency:

Continue the autonomous regulation of licensed professional counselors, marriage and family counselors and social workers. Oppose the recommendation to relegate the Texas State Board of Examiners of Professional Counselors and the other mental health professional licensing boards to advisory status under the over-extended Texas Department of Licensing and Regulation (TDLR).

- 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. A move to TDLR will not resolve access to care or regulatory challenges.
- Allocate licensing fee revenue to directly support the regulatory functions of the Texas State Board of Examiners of Professional Counselors.

Issues #2 and #3 would be moot had the Texas Department of State Health Services allocated funds generated by licensing fees to support the regulatory functions of the Texas State Board of Examiners of Professional Counselors as well as the boards that regulate Licensed Marriage and Family Therapists and Social Workers.

- TDLR is not equipped to regulate mental and behavioral health professionals. Expanding the scope of TDLR beyond its mission is likely to adversely impact consumer protection across all the industries it regulates and risk its efficiency.
- Retain the structure and autonomy of the Texas State Board of Examiners of Professional Counselors as well as the TSBEMFT and the TSBESW. Setting and enforcing clear, ethical training and practice standards for mental health professionals can only be accomplished by professionally specialized and independent licensing boards. Best practice to protect consumers is to have Independent, professionally specialized boards with public members that

regulate mental health care.

My Comment Will Be Made Public: I agree