

The National Association of Social Workers – Texas Chapter (NASW/TX) is the professional membership organization for social workers in Texas, with almost 6,000 members from across the state. Overall there are over 23,000 licensed social workers in Texas, and the functioning and operation of the Texas State Board of Social Worker Examiners (TSBSWE) is of utmost importance to our profession.

NASW/TX would like to comment on the Health Licensing Consolidation Project report from November 15th, 2016. And the recommendation by the Sunset staff that the TSBSWE be moved to the Texas Department of Licensing and Regulation (TDLR). We are opposed to this move, and instead believe that amending the statute to transform the existing Psychology Agency into the Texas Behavioral Health Professions Agency where the current **independent** boards for social workers, psychologists, licensed professional counselors, licensed marriage and family therapists and licensed chemical dependency counselors can all reside would be a better alternative.

By rewriting Chapter 501 of the Texas Occupations Code the existing psychology agency could be reshaped into the Texas Behavioral Health Professions Agency; where the Texas State Board of Social Worker Examiners, the Texas State Board of Examiners of Professional Counselors, the Texas State Board of Examiners of Marriage and Family Therapists, and the Texas State Board of Examiners of Psychologists would be housed together.

It is imperative that the TSBSWE be reauthorized for another twelve years. The board serves to protect the public, handles the issuing and renewal of licenses, acts as the arbiter on ethics and practice complaints and is integral to the practice of social work in the state. We recognize that there are issues with the length of time it takes to resolve a complaint, as well as the time it takes to approve supervision plans and process paperwork, but these could be easily remedied with a higher level of funding from the licensing fees collected. **There would be no additional fiscal note to implement this recommendation.** TDLR has no experience working with mental health professionals and instead serves as the regulatory agency for a variety of trades that do not involve counseling and the complexity of clients' behavioral health issues. An independent social work board at the proposed Texas Behavioral Health Professions Agency could share investigative, administrative and technological resources with the other independent boards, while still maintaining the authority and autonomy over the profession necessary to ensure that the public is protected.

By combining the boards under the transformation of an existing agency, the Sunset Commission will be addressing some of the concerns raised by the report about the administrative functioning of the boards, while still maintaining the integrity and independence necessary to the oversight of each profession.

We appreciate the opportunity to comment on this report, and if you have any questions please contact Miriam Nisenbaum, Executive Director of NASW/TX