

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, April 30, 2018 7:59:08 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Saturday, April 28, 2018 7:54 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: Alicia

Last Name: Pace

Title: Graduate Student

Organization you are affiliated with: University of Houston-Victoria

Email:

City: Richmond

State: Texas

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

As a graduate student who is about to graduate and enter into the field, 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.

Streamlining this structure is beneficial for not only professionals, but more importantly, the public that needs easier access to services.

As a graduate student in a CACREP program, all of my professors hold doctoral degrees, just as many other licensed professional counselors and other mental health professionals. 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.

Any Alternative or New Recommendations on This Agency:

As a taxpayer, I agree that 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.

I agree with the BHEC model as recommended unanimously by the last Sunset Commission; 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.

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 7:56:31 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, April 09, 2018 12:30 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: Alicia

Last Name: Pace

Title: Graduate Student

Organization you are affiliated with: University of Houston--Victoria

Email:

City: Richmond

State: Texas

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

Issue 1: The Structure of the State's Behavioral Health Licensing Agencies Is Antiquated and Inefficient.

I support and agree with the key recommendation by the Sunset Commission staff finding to consolidate the Board of Examiners of Marriage and Family Therapists, Board of Examiners of Professional Counselors, and Board of Social Worker Examiners with the Board of Examiners of Psychologists to create the Texas Behavioral Health Executive Council.

Status of 2016 Sunset Commission Recommendations, Management Actions currently In Progress:

Issue 3.7 Remove unnecessary and restrictive education requirements for professional counselor applicants for licensure.

In progress. On September 29, 2017, the LPC board adopted policy changes to simplify coursework acceptance for licensure requirements, including accepting courses taken over 10 years prior to receipt of an application. The board intends to adopt these changes formally in rule, and to amend its rules to accept CACREP or similarly accredited degrees without transcript reviews and the National Clinical Mental Health Counseling Exam as part of a comprehensive rule review in spring 2018.

As a soon-to-be graduate from a CACREP program, I support and agree with the formal changes by the LPC Board which created the policy for faster processing time, as well as support the requests to the Texas Administrative Code to implement permanent policy.

Issue 3.8 Reduce the burden of supervision requirements on licensees, supervisors, and staff. In Progress: In March 2017, the LPC board directed staff to improve supervision documentation, including eliminating site-specific information requirements, and to implement other streamlining measures. The board intends to propose these and other changes in rule to reduce the burden of supervision requirements as part of a comprehensive rule review in

spring 2018.

As a graduate student I support and agree with eliminating site-specific information requirements so that upon receiving my transcripts, I can apply for LPC-Intern licensure without having a specific site. I cannot be employed at a site as an LPC-Intern if I do not have licensure and under the current requirements, I cannot apply for LPC-Intern licensure if I do not have a site. The application prior to the current version had an option to choose “Not Applicable” in regard to site-specific information.

Any Alternative or New Recommendations on This Agency:

Issue 1: The Structure of the State’s Behavioral Health Licensing Agencies Is Antiquated and Inefficient.

I support the streamlining of licensing procedures through the boards the HHSC. I agree that the administrative codes impair change from becoming permanent and thus licensure processing times are slow and stagnant.

Employment opportunities are lost due to these attachments.

I agree that the BHEC model will promote collaboration through the boards and allow communities to be better served through this consolidation.

I agree with the recommendation for the BHEC structure to include one professional and one public member appointed by each board with the presiding officer, a public member, appointed by the Governor.

As I enter the profession, the BHEC structure, to me, promotes collaboration between the boards to serve clients in the best way possible and using resources to benefit the public so that individuals can be well. The recommendations of the BHEC model for structure allows for higher levels of efficacy and ensured quality through consolidation as well as accountability and thoroughness in decision making through members from each board.

Recommendation for Issue 3.7 and the comprehensive review in Spring 2018, I support the current policy recommendations to be implemented into permanent policy. As a full-time graduate student, I quit my full-time job to enter the program and dedicate my time to my studies. By graduating from a CACREP program, the curriculum that is followed meets the CACREP standards and therefore the lengthy and unnecessary review of my transcript is a process that slows my application down. The current time of processing an application for LPC-Intern licensure is 107 days, which is 3.5 months. I am graduating in August which currently means that I may be able to find employment by the end of the year. I support recommendations from the LPC Board to the Texas Administrative Code to make this policy a permanent change.

Recommendation for Issue 3.8 and the comprehensive review in Spring 2018, I support reverting to the prior application form available which had the option “Not Applicable” available under site-specific information. This would streamline the approval of LPC-Intern applications being processed so that licensure can be obtained and thus, employment can be obtained. It is frustrating as a student to not know, upon graduate, if I will be able to apply for licensure based on the fact that I do not have a site and that a site will not offer me employment without licensure.

My Comment Will Be Made Public: I agree