

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 8:15:23 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, November 11, 2016 2:43 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: Kimberly

Last Name: Patterson

Title: MA, MS, LPC-S, NCC

Organization you are affiliated with: CES Doctoral Student, Walden University

Email:

City: Cypress

State: Texas

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

LPCs, LMFTs and LCSWs are fully licensed, independent mental health providers who have clinical training as extensive as fully licensed psychologists.

There is no basis to limit their reimbursement rates to only 70 percent of the billable rate for other fully licensed health care providers. Increasing reimbursement rates for LPCs, LMFTs and LCSWs is likely to increase their willingness to remain or become Medicaid providers and help address the extensive unmet need for this fragile population. It is unconscionable and discriminatory to reimburse unlicensed psychology interns and fellows (Modifier UB), as well as LPAs and PLPs (Modifiers UC, U9), who are required to work under supervision, at the same rate as fully licensed, independent practitioners such as LPCs, LCSWs and LMFTs. In addition as a LPC-S in the state of Texas I 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). 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.

I pride myself in seeking leadership positions to support professional growth of mental health professionals, extend guidance in the process of higher education, and guide individuals who are seeking leadership accomplishment as I do. Regulation in reimbursement at a professional level is discouraging to counseling intern and professional independent practicing counselors. I currently hold a license in the state of Texas as a Licensed Professional Counselor Supervisor and also a National Counseling Certification. Every month I volunteer in my community with various non-profit organizations and support individuals who want to further their education in mental health under fair laws and regulations. With the recommendations from TDLR we are in jepordy of seeing a reduction of clientele as LPC's and this is a threat to appropriate behavioral health care providers. If there is other information you need please feel free to contact me

I'm apart of below:

Texas Counselor Association (TCA)
Texas Mental Health Association (TMHA)
American Counseling Association (ACA)
American Psychological Association (APA) The Association of Black Psychologists (ABPsi) Young Adult Ministry
(TCWW) Mosaic Women (TCWW)

Any Alternative or New Recommendations on This Agency: do not expand options for PA- or psychology interns to be billed as LPC are. There is no basis to limit reimbursement rates to only 70 percent of the billable rate for other fully licensed health care providers. Please leave at 100%. Increasing reimbursement rates for LPCs, LMFTs and LCSWs is likely to increase their willingness to remain or become Medicaid providers

My Comment Will Be Made Public: I agree