

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 1:16:33 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, November 14, 2016 1:02 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: Brandy

Last Name: Pounds

Title: Licensed Professional Counselor Supervisor

Organization you are affiliated with:

Email:

City: Denton

State: Texas

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

Retain the structure and autonomy of the Texas State Board of Examiners of Professional Counselors

Concerns about the Sunset Commission staff recommendations to move Texas mental Health Licensing Boards to Texas Department of Licensing and Regulatory services (TDLR)

The occupations currently regulated under TDLR are in no way related to the occupations of LMFT's, LPC's, and LCSW's. Each of these professions require advanced degrees and knowledge, skills, and ethics related to mental health to include Texas Administrative Codes and Family codes. Therefore TDLR currently lacks the specialized knowledge held by each profession to effectively regulate these licenses.

The proposal to allow the current licensing boards to act as "advisory boards" is unsatisfactory. The current boards have specialized knowledge, skills and experience to effectively and ethically regulate the LMFT's, LPC's, and LCSW's and therefore should remain the independent authority on regulation, rules and sanctions to ensure best practices continue being followed.

These recommendations are irresponsible. Licensees in the mental health field need to be regulated by competent, educate, and skilled board members to ensure the safety of those they serve.

Increase reimbursement rates for Provider Types 16, 18, & 40/51, to 100% of fees paid fully to fully licensed psychologists.

There is no basis to restrict the Medicaid reimbursement rates of LPCs, LMFTs and LCSWs to only 70 percent of the billable rate while other mental health professionals are being reimbursed at 100 percent. LPCs, LMFTs and LCSWs are fully licensed, independent mental health providers who have clinical training as extensive as fully

licensed psychologists. Currently, unlicensed psychology interns and fellows (Modifier UB), as well as LPAs and PLPs (Modifiers UC, U9) who are required to work under supervision are billing at the same reduced rate as LPCs, LMFTs and LCSWs. This is discriminatory and insulting.

Expand the definition of the Modifier UB to include LPC-Interns

LPC-Interns are provisionally licensed mental health providers. They have earned their graduate degrees and passed their licensing and jurisprudence examinations. Their professional qualifications exceed those of psychology interns and fellows, and they are not include on the list of approved Medicaid providers as the psychology interns and fellows are. This is discriminatory to these professional's and detrimental to a high risk and underserved population. Including LPC-Interns will provide these high risk individuals with increased access to care. It will also allow LPC-Interns more access to clients aiding them in obtaining their direct hours and providing unparalleled and invaluable experiences with this unique and challenging group of individuals. In the end, inclusion benefits everyone involved.

Any Alternative or New Recommendations on This Agency:
Sunset Committee Remarks

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My Comment Will Be Made Public: I agree