

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#); [Brittany Roberson](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 05, 2014 5:23:34 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 05, 2014 4:32 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 5, 2014 - 16:32

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Rod

Last Name: Pevoto

Title: LPC-S, NCC, LSOTP

Organization you are affiliated with: Community Agency Counseling

City: Fort Worth

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Recommendation 3.2 places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Professional Counselors which includes licensed professional counselors as well as public members ensures that all LPCs are well trained and adhere to high professional standards. The impact of LPCs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.

Any Alternative or New Recommendations on This Agency: Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Professional Counselors, Marriage and Family Therapists and Social Workers must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree. Maintaining professional credentials should maintain continuity from initial educational exposure in graduate school through internships and into active practice. To adequately protect public health, this traceable line of education and qualification is the ethical responsibility at all levels of the therapeutic profession and should be managed by qualified professionals under the legislature's oversight.

My Comment Will Be Made Public: I agree