

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 8:12:39 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, November 13, 2016 3:25 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: Linda A

Last Name: Ramsey, LPC-Intern, LMFT-Associate

Title:

Organization you are affiliated with:

Email:

City: Austin

State: Texas

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

I wish to add my support to the Texas Counseling Association's opposition to the Sunset Commission STAFF Recommendations for Texas Mental Health Licensing Boards.

As a 62 year old LPC-Intern and an LMFT-Associate who has spent my life savings since 2011 to become a licensed psychotherapist in the state of Texas in order to provide affordable mental health care to Texans who desperately need it, I find it hard to believe that this Commission seeks to impede my ability to do that.

I question in whose interests you are acting. Certainly not the majority of people in my county of Travis who are at risk because of lack of available mental health professionals.

In the words of TCA's stance I would like to see the Commission:

Continue the autonomous regulation of licensed professional counselors, marriage and family counselors and social workers. 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).

Oversight of mental health professionals is beyond the scope of TDLR. None of the occupations regulated by TDLR work with fragile individuals struggling to overcome devastating psycho, social, emotional and physical challenges. A move to TDLR will not resolve access to care or regulatory challenges.

Allocate licensing fee revenue to directly support the regulatory functions of the Texas State Board of Examiners of Professional Counselors. Issues #2 and #3 would be moot had the Texas Department of State Health Services allocated funds generated by licensing fees to support the regulatory functions of the Texas State Board of Examiners of Professional Counselors as well as the boards that regulate Licensed Marriage and Family Therapists

and Social Workers.

TDLR is not equipped to regulate mental and behavioral health professionals.

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.

Retain the structure and autonomy of the Texas State Board of Examiners of Professional Counselors as well as the TSBEMFT and the TSBESW.

Setting and enforcing clear, ethical training and practice standards for mental health professionals can only be accomplished by professionally specialized and independent licensing boards. Best practice to protect consumers is to have Independent, professionally specialized boards with public members that regulate mental health care.

Medicaid

Medicaid Rate Change Proposal: Comment Deadline and Public Hearing Wednesday,
11/16/16

The Health and Human Service Commission (HHSC) has been working for the past several months on these proposed rules which will take effect on 1/1/17.

These make some technical corrections but more significantly they add psychology interns and fellows to bill at the same level of reimbursement for services to Medicaid clients as fully licensed LPCs, LCSWs and LMFTs. TCA is in dialogue with HHSC to expand reimbursement rules to include LPC-Interns, but they were not included in this proposal.

Medicaid Rate Talking Points

Speak from your heart. Read the proposal. Submit your comments.

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

Expand the definition of the Modifier UB to include LPC-Interns. Currently, LPC-Interns are provisionally licensed mental health providers. They have earned their graduate degrees, passed their licensing and jurisprudence examinations. Their professional qualifications exceed those of psychology interns and fellows. To exclude LPC-Interns from the list of authorized Medicaid providers does not protect the public. Including LPC-Interns will increase access to care especially in our mental health workforce shortage areas. Including LPC-Interns will expand their opportunities to complete their required hours of supervision and the probability that they will continue to work with this fragile, underserved population throughout their careers.

Thank you for your consideration.

Any Alternative or New Recommendations on This Agency:

Please see above TCA recommendations. As a 62 year old LPC-Intern who decided it was worth the risk to take on student loans in order to help people, the expansion of the definition of the Modifier UB to include LPC-Interns, so that I can begin to be paid as my student loans are now being paid off would make a huge difference in the service I could offer.

My Comment Will Be Made Public: I agree