

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, November 16, 2016 3:50:37 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, November 16, 2016 3:46 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD SOCIAL WORKER EXAMINERS

First Name: Ronald

Last Name: Rea

Title: Licensed Clinical Social Worker

Organization you are affiliated with: None

Email:

City: Houston

State: Texas

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

Testimony Concerning State Boards Regulating Professional Practice of Social Work

1. The Commission is proposing transferring the function to The Department of Licensing and Regulation (TDLR). This state agency does not have any experience in licensing and regulating the kinds of professional services provided by the Behavioral Health professions. Virtually all the occupations which TDLR now regulates do not require graduate professional training beyond the Bachelor's level and are primarily employ an apprentice model of craft training.
2. Public regulation of the professions of Social Work, Professional Counseling and Marriage and Family Counseling should not be delegated to non-professional administrative personnel who lack graduate level education and supervised professional experience in the counseling professions to be regulated. The state has an obligation to provide professionally informed protection of citizens who seek assistance with very personal and critical matters affecting their most intimate personal concerns and social relationships.
3. The same reasoning used by the Sunset Commission would require that legal regulation of other graduate level professions requiring a Master or Doctors degree be transferred to TDLR as well. The Texas Department of Health Services is an appropriate setting for regulation of these three counseling oriented professions which are much more aligned with the health occupations than with more technical trades that are learned through one the job and the apprentice training model.
4. The affected professionals must be significantly involved in formulating standards relating to minimum standards to be met prior to beginning professional practice and in maintaining demonstrable knowledge and skills needed to maintain a high level of competent and ethical practice. In addition, a person meeting professional standards must be involved in hearing complains and administering sanctions where

indicated.

5. Fees paid to the State of Texas should be sufficient to cover the cost of implementing the professional licensing functions and not be a tax alternative for the general fund of the state.

Any Alternative or New Recommendations on This Agency: Problems identified by Sunset Commission can be remedied without transferring licensing function to a less appropriate state agency.

My Comment Will Be Made Public: I agree