

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, April 30, 2018 7:58:44 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Sunday, April 29, 2018 12:30 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: Nicole

Last Name: Richardson

Title: LPC-S, LMFT

Organization you are affiliated with:

Email:

City: Austin

State: Texas

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

I am commenting on the Sunset Commission Staff Report and in response to the public hearing on the Behavioral Health Licensing Boards held on Wednesday, April 25, 2018.

I support the recommendation that the boards regulating LPCs, LMFTs, Social Workers, and Psychologists be housed at the new Texas Behavioral Health Executive Council, as this will create a more efficient and effective structure for all professionals who deliver mental health services in Texas.

The Texas Behavioral Health Executive Council will not create one combined board for all mental health professionals. Each of the four licensing boards will retain their integrity and rule-making authority for each distinct discipline.

I support creation of the Texas Behavioral Health Executive Council, but request that the professional members appointed to BHEC by each licensing board have voting privileges on BHEC.

Under the Texas Behavioral Health Executive Council, each board will still be appointed by the Governor as currently set forth in the Occupations Code.

Each board's rule-making authority will remain intact and licenses will be issued by each Board – not by BHEC.

The Texas Behavioral Health Executive Council is essentially an administrative agency – not a licensing board. It will achieve efficiencies and consistency where appropriate, such as in administrative activities related to applications and investigations.

The Texas Behavioral Health Executive Council will not be authorized to establish rules. They will review rules but will only be able to reject or send rules back to each board if the rules violate current statutes or create anti-

competitive, monopolistic, or anti-trust scenarios.

Maintaining the status quo or creating two separate administrative agencies for the four mental health licensing boards is NOT the most efficient use of taxpayer dollars. The state's interests are best served by forming ONE agency as recommended in the Sunset Commission Staff Report.

Any Alternative or New Recommendations on This Agency: The LPC board office is grossly understaffed and has created a dangerous delay in investigations of misconduct actions ordered by the board. New staff must be hired and trained immediately.

My Comment Will Be Made Public: I agree