



Texas Society for Clinical Social Work

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November 30, 2016

Texas Sunset Advisory Commission

P. O. Box 13066

Austin, Texas 78711

The Honorable Larry Gonzales

Mr. Chairman and Members of the Sunset Advisory Commission,

The Texas Society for Clinical Social Work (TSCSW) appreciates this opportunity to respond to The Sunset Advisory Commission Staff Report on the Health Licensing Consolidation Project.

We concur with the Staff's recommendation to continue the legal regulation of the Practice of Social Work in Texas for the protection of the consumer. We further agreed that the current administrative attachment of the licensing boards of Social Workers, Professional Counselors, Marriage and Family Therapists and Chemical Dependency Counselors to the Texas Department of Health and Human Services is not working in the best interests of people of Texas. However, TSCSW does not support the recommendation in the Health Licensing Consolidation Project Report.

The Texas Department of Licensing and Regulation (TDLR) does not have the expertise or the experience of regulating health care professions. Legal regulation of health care professions exists for the purpose of the protection of the consumer. Transferring these behavioral health professional boards to TDLR will not serve to protect the public.

The Issues identified by the Sunset Review Staff should be addressed in a manner that would protect the public and be cost-effective in administrating these independent boards. For legal regulation of health care professions to be efficient and effective, these behavioral health licensing boards must remain independent boards appointed by the governor and having rule-making authority. Of course, the practice of including public members on these independent boards should be continued. We support the Texas State Board of Social Worker Examiners be re-authorized as a governor-appointed independent board with rule-making authority for an additional twelve (12) years.

In order to address the issues identified by the Sunset Review Staff, we are suggesting another alternative. TSCSW proposes that there be a change in statute such that Chapter 501 of the Texas

Occupations Code be amended to transform the existing independent psychology agency into the Texas Behavioral Health Professions Agency which would house the independent licensing boards of Chemical Dependency Counselors, Professional Counselors, Marriage and Family Therapists, Psychologists, and Social Workers. This transformation would consolidate the administrative functions of these boards into one administrative structure. It would provide for allocation of resources such that economies of scale and other cost-saving methods could be realized. This alternative proposal would address the issues identified by staff and provide for the protection of the public wherever behavioral health services are being delivered in Texas.

The Texas Society for Clinical Social Work is available for further discussion and consultation.

Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Kathy T Rider, LCSW, BCD". The signature is written in a cursive style.

Kathy T Rider, LCSW, BCD, CGP, FAGPA

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