

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, November 14, 2016 12:25:25 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, November 14, 2016 12:23 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: Stephen

Last Name: Samet

Title: Professor/Counselor

Organization you are affiliated with: Texas Counseling Association

Email:

City: San Antonio

State: Texas

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

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.

Consideration should be focused on the importance of having a licensing Board made up of licensed professionals in the related field. This has allowed for greater depth of knowledge and background, to review procedures, updating Ethics standards, undertaking challenges to licensing, reviewing approved conference programming, and creating seminars/webinars and updates on licensing practices and procedures. Where lumping a wide range of different licensed programs under a general Board might save money, it doesn't provide the direct knowledge, background and experience, to oversee the specific needs of diverse professions.

Oversight of mental health professionals is beyond the scope of TDLR. None of their present licensing entities deal with the fragile nature of clients often dealt with by licensed counselors. TDLR isn't equipped or regulated to handle the serious and diverse client issues trained and licensed counselors deal with daily.

Any Alternative or New Recommendations on This Agency:

First: 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).

Second: 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.

And, Third: 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.

My Comment Will Be Made Public: I agree