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From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Monday, April 02, 2018 1:47 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: Kierstin

Last Name: Thornhill

Title: Coordinator of Children's Clinical Services

Organization you are affiliated with: The Council on Recovery

Email: kthornhill@councilonrecovery.org

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or
Opposed: As a member of TCA and a current LPC-Intern license holder, the recommendations proposed are of paramount importance to me. I support the recommendation that more efficient and effective regulation of these professions will not only provide improved services and increased responsiveness to licensees but also will better protect behavioral health care consumers. I submitted my paperwork for upgrade to full LPC licensure on November 1, 2017 and am still waiting for the paperwork to be published. I have incurred continued supervision fees and have lost a significant amount of money since my increase in pay will not be awarded until full licensure is approved. Further, the agency I work for is not able to accept insurance money until I am fully licensed and I am not able to serve the community as wholly as I am intended as a mental health counselor due to the incredulous delay at the state level in having resources to approve licensure. The call for mental health has never been higher and yet it is more and more difficult not only to obtain licensure to meet those needs, but also to be supported by experienced professionals at the board level to ensure those needs are met ethically, appropriately, and successfully.

Any Alternative or New Recommendations on This Agency:
I disagree with the Sunset Staff recommendation for the Behavioral Health Executive Council composition and authority. I recommend that BHEC be structured as proposed during the last Sunset Review to include one professional and one public member appointed by each board with the presiding officer, a public member, appointed by the Governor. This structure will effectively address concerns involving the protection of the state's immunity from restraint of trade claims and will also protect against any anti-competitive rulemaking from the independent boards. Each of the four behavioral health boards would have full rulemaking authority over scope of practice, qualifications and training. BHEC would have authority to review and approve or reject rules promulgated by the independent licensure boards to ensure they are consistent with statutes, are not anticompetitive, do not result in restraint of trade, or cause monopoly concerns. Inclusion of one professional member from each of the respective licensing boards helps to ensure that professional expertise is reflected in BHEC's decisions. This model has proven to be very effective for other regulatory entities such as the Occupational Therapy and Physical Therapy Executive Council.

My Comment Will Be Made Public: I agree