

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Roberson](#); [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, June 05, 2014 12:47:19 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 05, 2014 11:12 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 5, 2014 - 11:12

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Vicki

Last Name: Williams-Patterson, MCAT, ATR-BC, LPC-AT

Title: Licensed Professional Counselor - Art Therapist

Organization you are affiliated with: Texas Mental Health Counselors

City: San Antonio

State: Texas

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

I am opposed to the recommendation 3.2 suggesting re-authorization of the Department of State Health Services that would result in the Texas State Board of Examiners of Professional Counselors as well as the Marriage and Family Therapist and Social Worker licensing boards be reconstituted as advisory committees at the Texas Department of Licensing and Regulation.

This recommendation places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Professional Counselors which includes licensed professional counselors as well as public members ensures that all LPCs are well trained and adhere to high professional standards. The impact of LPCs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.

Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Professional Counselors, Marriage and Family Therapists and Social Workers must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree.

Any Alternative or New Recommendations on This Agency: In the spirit of the time honored saying, "If it ain't broke, don't fix it.", I recommend that the Texas State Board of Examiners of Professional Counselors as well as the Marriage and Family Therapist and Social Worker licensing boards remain under the Department of State Health Services with licensing boards that include professional members who hold the applicable license and have the experience and training to act in the vital interest of the public and their mental health care needs.

My Comment Will Be Made Public: I agree