

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, November 16, 2016 1:24:53 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, November 16, 2016 1:06 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS MARRIAGE AND FAMILY THERAPISTS

First Name: Charles

Last Name: West

Title: President

Organization you are affiliated with: Texas Association for Marriage and Family Therapy

Email:

City: Lantana

State: Texas

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

Increase reimbursement rates for Provider Types 16, 18, & 40/51, to 100% of fees paid to fully licensed psychologists. LPCs, LMFTs and LCSWs are fully licensed, independent mental health providers who have clinical training as extensive as fully licensed psychologists. There is no basis to limit their reimbursement rates to only 70 percent of the billable rate for other fully licensed health care providers. Increasing reimbursement rates for LPCs, LMFTs and LCSWs is likely to increase their willingness to remain or become Medicaid providers and help address the extensive unmet need for this fragile population. It is unconscionable and discriminatory to reimburse unlicensed psychology interns and fellows (Modifier UB), as well as LPAs and PLPs (Modifiers UC, U9), who are required to work under supervision, at the same rate as fully licensed, independent practitioners such as LPCs, LCSWs and LMFTs.

Any Alternative or New Recommendations on This Agency:

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).

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.

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.

TDLR is not equipped to regulate mental and behavioral health professionals.

Expanding the scope of TDLR beyond its mission is likely to adversely impact consumer protection across all the industries it regulates and risk its efficiency.

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.

My Comment Will Be Made Public: I agree