

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 8:17:11 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, November 11, 2016 12:37 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: jill

Last Name: willis

Title:

Organization you are affiliated with: Texas Counseling Association

Email:

City: stephenville

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.
- Expand the definition of the Modifier UB to include LPC-Interns. Currently, LPC-Interns are provisionally licensed mental health providers. They have earned their graduate degrees, passed their licensing and jurisprudence examinations. Their professional qualifications exceed those of psychology interns and fellows. To exclude LPC-Interns from the list of authorized Medicaid providers does not protect the public. Including LPC-Interns will increase access to care especially in our mental health workforce shortage areas. Including LPC-Interns will expand their opportunities to complete their required hours of supervision and the probability that they will continue to work with this fragile, underserved population throughout their careers.
- 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.

I think that all of the recommendations for issue 2 should be implemented after keeping the LPC board and independent board, housed in DSHS, with resources to implement those recommendations.

I agree with recommendations for 3.1, 3.2, 3.6, 3.8, and 3.9. I would revise

3.7 to only include CACREP accredited programs with an automatic approval.

The standards for programs who are not CACREP accredited are not regulated, therefore, that assumption of standardization of coursework/academic fulfillment could cause negligence.

I disagree with 3.4 because that should be a board regulated decision because they are professionals who are the most direct in contact with peers at a national level. Fee structure for licensure for professionals should not be regulated by individuals who are not in that profession.

Any Alternative or New Recommendations on This Agency: I support the three independent boards remaining under DSHS. I would like to see the boards given resources to address the issues that the sunset review found. These resources should match the amount of work that each board has before them.

For example, professional counselors should have more resources allocated to them because there is more LPC's in the state of Texas. The recommendations, especially regarding claims that are filed and the length of time to process applications would be easily addressed without realigning the board.

My Comment Will Be Made Public: I agree