

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, November 14, 2016 4:11:53 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, November 14, 2016 4:05 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: Lucy

Last Name: Ziegler

Title: L.K. Ziegler, MA, LPC, LLC

Organization you are affiliated with: L.K. Ziegler, MA, LPC, LLC

Email:

City: Boerne

State: Texas

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

1) I am opposed to the statement / proposal that the "hurdles to applicants" for licensing as an LPC are "unnecessary" and am curious about how the current requirements for licensing might be "potentially reducing customer safety" because I believe changes lowering the standards of training and preparation for practicing are exactly what would cause increased safety concerns. The requirements of passing all education and training in the core subjects, theories, clinical skills, ethics and the practice of self awareness of abilities, brain physiology and the mind/body connection, supervised/overseen experience with appropriate supervision is vital to producing qualified and accountable counselors. I believe that what you are suggesting can dramatically increase the possibility of public harm due to ill prepared and uncommitted (to the ideals of "do no harm" and ethical standards) potential Licensed Professional Counselors who will have, given the changes in requirements of licensing and supervised experience practice, a much lower standard of practice awareness.

The old question is "What do they call the people who graduate in the lower 50% of their Medical School Graduating class?" "Doctor"...

Perhaps the real solution to maintaining and improving customer safety does not lie in changing the governmental regulatory agency and enabling it to reduce standards of practice and education as well as requirements for licensing, but to change agencies to one that not only has the man power to monitor and regulate the licensing and proper supervisory practices but that also has the insight to provide changes that raise - the - bar to higher standards and education requirements to insure the products of those changes are truly able and committed to providing Best Practices possible (say ...

.... a better prepared upper 50% and lower 50% of the graduating class of Counselors)

2) I also oppose / do not agree that any licensing requirements or rules should be changed in order to provide "expedited licensing for military personnel and spouses".

3) I am also opposed / disagree with the statement that "overly restrictive education and experience requirements and bureaucratic supervision requirements add unnecessary burdens to entering the profession".

These statements of loosening the quality and standards of education and experiential practice before turning someone loose on an unsuspecting public is the more "potentially reducing consumer safety" than merely switching the to another agency to watch over this profession.

Any Alternative or New Recommendations on This Agency:

1) I am opposed and do not agree that the "hurdles to applicants" for licensing as an LPC are "unnecessary" and am curious about how the requirements for licensing might be "potentially reducing customer safety" because changes lowering the standards of training and preparation for practicing are exactly what would cause increased safety concerns. The requirements of passing all education and training in the core subjects, theories, clinical skills, ethics and the practice of self awareness of abilities, brain physiology and the mind/body connection, supervised/overseen experience with appropriate supervision is vital to producing qualified and accountable counselors. I believe that what you are suggesting can dramatically increase the possibility of public harm due to ill prepared and uncommitted (to the ideals of "do no harm" and ethical standards) potential Licensed Professional Counselors who will have, given the changes in requirements of licensing and supervised experience practice, a much lower standard of practice awareness. The old question is "What do they call the people who graduate in the lower 50% of their Medical School Graduating class?" "Doctor"... Perhaps the real solution to maintaining and improving customer safety does not lie in changing the governmental regulatory agency and enabling it to reduce standards of practice and education as well as requirements for licensing, but to change agencies to one that not only has the man power to monitor and regulate the licensing and proper supervisory practices but that also has the insight to provide changes that raise - the - bar to higher standards and education requirements to insure the products of those changes are truly able and committed to providing Best Practices possible (say a better prepared upper 50% and lower 50% of the graduating class of Counselors)

2) I Oppose / do not agree that any licensing requirements or rules should be changed in order to provide "expedited licensing for military personnel and spouses".

Expedited??? I am not sure what "expedited" means in this instance.... do they get to cut short on the amount of hours required in supervision? or practicum hours? or other educational or professional standards education? Because they have chosen to serve the country by choosing to work for the government in ways that require them to move to different areas, perhaps while attending a college? And while I am thankful for each and every one of them, it does not sound logical to give a lower standard of professionalism to a group of persons wanting to practice a profession that involves the well being of another persons MENTAL HEALTH. Why not make the colleges and universities agree to adjust their levels of acceptance to their universities and what is considered passing grades for programs and classes being taken by military personnel or their spouses needing to move because of their service jobs? Maybe there could be a standardized fee schedule for tuition nationwide? Helping them out, yes. But not to "expedite" Professional Licensing.

3) I am also disagree with the statement that "overly restrictive education and experience requirements and bureaucratic supervision requirements add unnecessary burdens to entering the profession".

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"Unnecessary burdens" Really? Can we also reduce the requirements to become a licensed Dentist? or a Licensed Physical Therapist? or Licensed Electrician? Surely there are many persons wishing to enter these professions that find it Unnecessarily Burden-some to obtain the education and apprenticeships for these profession, despite the potential harm to the public seeking their help.

These statements of loosening the quality of education and experiential practice before turning someone loose on an unsuspecting public is the more "potentially reducing consumer safety" than merely switching the to another agency to over see the profession of Counseling.

My Comment Will Be Made Public: I agree