From: Sunset Advisory Commission
To: Janet Wood; Brittany Roberson
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 06, 2014 2:38:24 PM

-----Original Message-----
From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Friday, June 06, 2014 2:01 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 14:00

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Matthew

Last Name: Beal

Title: Outpatient Therapist

Organization you are affiliated with: Heart of Texas MHMR

City: Waco

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
Thank you for your important work. Regarding the Staff Report, May 2014, I have significant concerns that the recommendations 3.1 and 3.2 could have a negative impact on the welfare of Texas residents.

Re 3.1: the argument that the oversight of many programs is redundant may be valid, but I need to be convinced that the conclusion holds - that such redundancy is unecessary. Can Sunset demonstrate that the other agency or agencies involved in oversight is adequately protecting Texans? And the question of consumer access to information strikes me as a questionable criteria that could place poorer populations at increased risk due to clear disparities in access. Similarly, that few complaints have been received in certain categories may indicate the difficulty that more vulnerable populations have to channels for complaint.

Re 3.2: I received my license as an LPC approximately 1 year ago, and the process was smooth, clear, and faster than I expected. I have concern that a significant change would cause needless confusion and be riddled with potential for unforseen problems. Additionally a look at TDLR's web site indicates a significant divergence between the nature of licensure they currently oversee and that which Sunset is recommending. The nature of mental health and related licensure (LPC, LCSW, LMFT, LCDC) departs radically from their current work. Finally, the need for a "temporary surcharge" (p. 54) upon licensees during the transition period is an undue burden upon licensees with a high degree of education (with associated burdens such as student loan repayment) and a relatively low pay grade.

Also, the argument that DSHS does not have the resources strikes me as unfounded. The Report indicates that DSHS budget is $70 million (p. 41), yet the state kept $21 million of the fee revenue (p. 43). That is a full 30% of DSHS yearly budget! Why would DSHS not utilize those funds to do the work that it has been assigned to do in an

effective, timely manner? Significant changes always include unforseen risks and complications, and with $21 million in resources untouched, it would seem that before such changes are deemed "necessary" it would be prudent to utilize those resources to do the job assigned.

Any Alternative or New Recommendations on This Agency: I recommend that no such changes be made until Sunset offers a more adequate explanation of the necessity of the changes and assurance that the change will not leave Texans more vulnerable to unhealthy practices (3.1) and until Sunset provides a clear plan for the transition of licensing to another agency in a manner that assures licensees of a smooth transition while upholding the standards of excellence required of such licensure and the professional status due such licensure (3.2). Any changes made should demonstrably leave Texans less vulnerable to health related problems and should render the licensure of mental health professionals at least as rigorous, smooth, and affordable, while realistically promoting the profession's status in the public's esteem.
Doing so will be in the public and profession's best interests.

My Comment Will Be Made Public: I agree