

**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 12:51:17 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 05, 2014 10:56 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 - 10:55

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Ellen

Last Name: Boehmer

Title: LPC, NCC

Organization you are affiliated with: Texas Counseling Association, Texas School Counseling Association

City: Richardson

State: Texas

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

I oppose Recommendation 3.2 to transfer the Texas State Board of Examiners to the Texas Dept. of Licensing and regulations and reconstitute this independent board as an advisory committee.

Recommendation 3.2 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: Keep the Texas State Board of Examiners of Professional Counselors in the Dept. of State Health Services.

My Comment Will Be Made Public: I agree