

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 16, 2014 8:11:25 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, June 15, 2014 1:07 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Sunday, June 15, 2014 - 01:06

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Anne

Last Name: Borges

Title: Licensed Professional Counselor-I

Organization you are affiliated with: West Texas Counseling Association, American Psychological Association

City: Lubbock

State: Texas

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

I am concerned about the final authority of rules, regulations and disciplinary actions concerning Texas passing better legislation for LPC's here in Texas is going to rest with a small public board whose primary experience has been in the regulation of industries and trades, as this board does not currently oversee any health profession licensees. The current licensing board would be an advisory board with no regulatory authority. The Texas Counseling Association is concerned that this regulatory structure could negatively impact the perception of LPCs as highly qualified health professionals and that it will dilute appropriate regulation of mental health providers to protect the public.

· We are also concerned because this recommendation is coming without detailed analysis. The staff themselves state on page 44 of the report that "Given the enormous scope of DSHS and the difficult task of the Sunset review to understand and identify its appropriate mission, goals and objectives, the luxury of a detailed analysis of each regulatory program was simply not possible." That is not fair nor advantageous to our profession, for work in the State of Texas, we are fighting for our very rights here as mental health care professionals.

· TCA contends that a decision of this magnitude merits a detailed analysis. In the absence of any data indicating that the change is based on data to support improved operations, TCA is requesting that any action to restructure the TSBEP be postponed until the agency goes through its regularly scheduled, independent Sunset Review which is scheduled for 2016 for action by the 2017 Legislative Session (next cycle). Given the timeline that the staff recommends for the restructuring, adhering to the original sunset review timeline set forth in statute would not impose an unreasonable delay.

Sincerely yours,
Anne R. Borges

Any Alternative or New Recommendations on This Agency: Please see my comments above.

My Comment Will Be Made Public: I agree