

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: Thursday, June 05, 2014 1:26:52 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 05, 2014 12:58 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 5, 2014 - 12:58

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Greta

Last Name: Davis

Title: Licensed Professional Counselor

Organization you are affiliated with: Greta A. Davis, Ph.D. (private practice)

City: Richardson

State: Texas

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

I contend that recommendation 3.2 places the public at risk. Currently the Texas State Board of Examiners of Professional Counselors provides oversight for licensed professional counselors. This independent board ensures that all LPCs are well trained and adhere to high professional standards. Licensed Professional Counselors hold master and doctoral-level degrees, have extensive training in professional counseling as well as numerous subspecialty areas and have a considerable potential impact on the health and safety of the clients they serve. As such I strongly contend that an independent regulatory board that includes experienced licensed professionals is necessary to provide the quality of regulatory oversight needed. 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: I would strongly recommend that Licensed Professional Counselors continue to have their own regulatory board to oversee LPCs in Texas. That board should include current LPCs with appropriate experience to be able to advise, guide, and adjudicate cases as necessary.

My Comment Will Be Made Public: I agree