

**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 2:06:38 PM

---

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 16, 2014 11:36 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 16, 2014 - 11:35

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Laurie

Last Name: Donovan

Title: LMFT, LCSW

Organization you are affiliated with: NASWTX, TAMFT

City: Austin

State: Texas

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

I am endorsing the position of NASWTX regarding the Report, and would support as the "home" of the licensing boards whichever can best meet the following needs (points):Points:

- An independent board or advisory board must be empowered to hear complaints, rule on those complaints, and decide disciplinary actions. The board must have access to licensed professional Social Workers to provide professional expertise in rule development, rule changes, and implementation.
- Adequate staff and IT funding is critical to any professional regulatory board. It must collect and analyze data on the licensees, to plan for future workforce needs, as well as to measure effectiveness of the licensure activities. DSHS is extremely challenged in these areas because of lack of funding and staffing resources to effectively operate this licensing office, not because they lack focus.
- NASW Texas advocates that the statute of limitations for complaints to the social work licensing board should be in line with other professional fields, of five to no more than seven years. Any changes must comply with all other statutes regulating the practice of social work.
- If another agency, will oversee the Social Worker Licensing Board, the agency must possess the necessary public health, social work, and mental health expertise to fully understand scope of professional practice issues and to ensure that Texas has a properly educated and trained workforce
- The current Executive Director of the Board is not a social

worker, but is supervised by a licensed social worker. NASW Texas strongly advocates for professional, licensed social work managerial level staff at the licensing board.

- Finally, social workers should not have to pay for any administrative decision to move the program with surcharges to their licensing fees. This is punitive and grossly inappropriate as the profession has not advocated for this change.

Any Alternative or New Recommendations on This Agency:

Any other agency which will have the funding/staffing necessary to complete the functions needed:

- An independent board or advisory board must be empowered to hear complaints, rule on those complaints, and decide disciplinary actions. The board must have access to licensed professional Social Workers to provide professional expertise in rule development, rule changes, and implementation.
- Adequate staff and IT funding is critical to any professional regulatory board. It must collect and analyze data on the licensees, to plan for future workforce needs, as well as to measure effectiveness of the licensure activities. DSHS is extremely challenged in these areas because of lack of funding and staffing resources to effectively operate this licensing office, not because they lack focus.
- NASW Texas advocates that the statute of limitations for complaints to the social work licensing board should be in line with other professional fields, of five to no more than seven years. Any changes must comply with all other statutes regulating the practice of social work.
- If another agency, will oversee the Social Worker Licensing Board, the agency must possess the necessary public health, social work, and mental health expertise to fully understand scope of professional practice issues and to ensure that Texas has a properly educated and trained workforce
- The current Executive Director of the Board is not a social worker, but is supervised by a licensed social worker. NASW Texas strongly advocates for professional, licensed social work managerial level staff at the licensing board.
- Finally, social workers should not have to pay for any administrative decision to move the program with surcharges to their licensing fees. This is punitive and grossly inappropriate as the profession has not advocated for this change.

My Comment Will Be Made Public: I agree