

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: Friday, June 06, 2014 4:01:41 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 3:27 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 - 15:26

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jodie

Last Name: Elder

Title: Private practice counselor / marriage and family therapist

Organization you are affiliated with: Texas Counseling Association

City: Beeville

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I oppose the recommendation from the Sunset Commission staff to reconstitute the Texas State Board of Examiners of Professional Counselors, the Texas State Board of Examiners of Marriage and Family Therapists, and the other mental health licensing boards housed at DSHS, as an advisory committee housed at the Texas Department of Licensing and Regulation. I am concerned that final authority of rules, regulations and disciplinary actions would rest with a small public board whose primary experience has been in the regulation of industries and trades. TDLR does not currently oversee any health profession licensees. The current licensing board would be an advisory board with no regulatory authority. I am 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.

Any Alternative or New Recommendations on This Agency:

- 1) The Texas State Board of Examiners of Professional Counselors and Texas State Board of Examiners of Marriage and Family Therapists remain independent licensing boards housed at the Department of State Health Services.
- 2) The Sunset review of the TSBEP and TSBEMFT (and the other mental health licensing boards) be conducted in 2016 as scheduled in current statute.

My Comment Will Be Made Public: I agree