

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Sunday, June 08, 2014 6:35:00 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 5:47 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 - 17:46

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Courtney

Last Name: Heard

Title: Program Specialist

Organization you are affiliated with: Texas Counseling Association

City: Austin

State: Texas

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

As a member of the Texas Counseling Association, holding a license as a Licensed Professional Counselor, with a Ph.D. in Counselor Education, and an employee of the Department of State Health Services, I am strongly opposed to the Sunset Advisory Commission's 3.2 recommendation that 12 regulatory programs to include the Texas State Board of Examiners of Professional Counselors be moved under the purview of the Texas Department of Licensing and Regulation (TDLR).

The Sunset Advisory Commission's statement that these occupational licensing programs are unrelated to the core public health mission of DSHS, shows a gross misunderstanding of these professions interface with mental health clients served in Texas, through Local Mental Health Authorities (LMHAs) and Managed Care Organizations (MCOs) receiving funding through DSHS.

Core masters-level licensed professionals responsible for providing mental health services through LMHAs and MCOs are referred to as Licensed Practitioners of the Healing Arts (LPHAs), referenced in 25 TAC, Chapter 412, Subchapter G, and include a staff member who is: (A) a physician; (B) a licensed professional counselor; (C) a licensed clinical social worker; (D) a licensed psychologist; (E) an advanced practice nurse; or (F) a licensed marriage and family therapist.

Clearly, as defined in rule, and as supported through the longstanding hiring practices of these agencies, these occupations do represent the "core public health mission" of DSHS.

Additionally, many of the professions addressed in recommendation 3.2 represent core policy makers and program specialist staff at DSHS.

Furthermore, many of the occupations currently overseen by TDLR are not professional licenses that support a public health mission. They are not professions that require graduate degrees towards licensing, such as required to become a Licensed Professional Counselor, a Licensed Marriage and Family Therapist, and certain levels of social workers.

It would be a disgrace to the counseling profession to be removed from the regulatory purview of DSHS.

Any Alternative or New Recommendations on This Agency: N/A

My Comment Will Be Made Public: I agree