

**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:** Friday, June 06, 2014 12:00:02 PM

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

From: [sundrupal@capitol.local](mailto:sundrupal@capitol.local) [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 06, 2014 9:00 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 6, 2014 - 08:59

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Janice

Last Name: Holden

Title: Ed.D., LPC-S

Organization you are affiliated with: Private practice of counseling

City: Lewisville

State: Texas

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

The Staff Report is thorough. However, I vehemently oppose Recommendation 3.2 to transfer the Texas State Board of Examiners of Professional Counselors to the Texas Department of Licensing and Regulation and to reconstitute this independent board as an advisory committee. My reasons are at least twofold:

1. The TSBEPCC performs extensive oversight of the qualifications and ongoing practices of thousands of LPCs in Texas. This oversight highly specialized clinical, ethical, and legal knowledge; thus, it provides crucial protection to the millions of Texans who use LPC services every year. Thus, in order to avoid the significant disempowerment that would accompany reconstitution as an advisory board, the Board needs to remain an entity in its existing form.
2. LPCs--as well as LMFTs and SWs--must hold advanced graduate degrees and are considered Health Professionals under Texas law. Because none of the occupations regulated by TDLR are required to hold even a bachelor's degree and are not legally recognized health professions, TDLR is not an appropriate entity to house the TSBEPCC.

I urge the Commission to reconsider and reverse its recommendation of these two aspects of the Report.

Any Alternative or New Recommendations on This Agency: Despite the expense, I recommend that a separate and independent entity--titled perhaps the Professional Mental Health Licensing Agency--including LPCs, LMFTs, and SWs--be created. Because their licensing processes are similar, money could be saved by their collaborating on and streamlining processes they have in common. Without extensive regulation of Mental Health Professionals, the wellbeing of the people of Texas is at risk; protecting them/us is worth the expense.

My Comment Will Be Made Public: I agree