

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, June 11, 2014 8:01:52 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 10, 2014 5:56 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 10, 2014 - 17:56

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Donald

Last Name: Jones

Title: PhD, MEd, LPC-S

Organization you are affiliated with:

City: Austin

State: Texas

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

Although I strongly support the Sunset Commissions goal of improving DSHS, the Sunset Advisory Commission's report recommends two deeply problematic changes that, at minimum, deserve extensive public discussion in order for the public's interest to be best served.

One of the proposed changes involves moving three of the professions that provide mental services from DSHS to TDLR, while leaving other professions that provide mental health services under the auspices of DSHS. Under the proposed changes Social Workers, Marriage and Family Therapists, and Licensed Professional Counselors would be moved to TDLR, while Psychologists, Psychiatric Nurses, and other health professions would remain under DSHS.

This change sends the wrong message to the public, and it does so at a time when a DSHS report from February 2014 (The Mental Health Workforce Shortage in Texas) has highlighted problems that could be made worse by this change.

Separating the professions into different groups that are under the auspices of two different departments would be confusing to the public and would be potentially dangerous in terms of the public's access to healthcare. When study after study indicates that the kind of licensure has no impact upon therapeutic outcomes, the primary goal should be increasing access to needed healthcare, not forcing the public to choose between healthcare that is linked to a department that obviously deals with healthcare (DSHS) and a department that is linked to air conditioning, licensed breeders, tow truck operators, and used auto parts recyclers.

The second proposed change is that the independent boards that oversee these professions be replaced with advisory committees. Although I am personally unsure about the potential harm or benefits of this choice to the public, it is a substantial change that merits extensive discussion before being put in to place. As with the shift from DSHS to

TDLR, it is once again confusing to make a change that applies to some of the mental health professions are administered and not other mental health professions. While a change from independent boards to advisory committees might enable the professions to respond more quickly to changes in technology, culture, population demographics, and current research, there is a risk that the quality of mental health services in Texas might adversely affected. In particular, there is a risk that standards of care and the nature of the services that are provided might become unduly influenced by the whims of whatever political party happens to be in power.

In summary, if the shift of Social Workers, Marriage and Family Therapists, and Licensed Professional Counselors from DSHS to TDLR is good for the delivery of healthcare services in the state, it seems peculiar that the other healthcare professions aren't also included in this change. Just as importantly, there are unanswered questions about the ways that the advisory committees would function and the kind of safeguards that would be put in place make sure that the delivery of mental health services would be guided by sound healthcare policy rather than the ups and downs of competing political agendas..

Thank you for considering my comments.

Sincerely,

Donald E. Jones, PhD, MEd, LPC-S

Any Alternative or New Recommendations on This Agency: Consider all of the mental health professions as whole when evaluating changes such as transferring oversight to TDLR and the elimination of independent boards.

My Comment Will Be Made Public: I agree