

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 12:02:10 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 12:02 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 - 12:01

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Lynda

Last Name: Kirk, MA, LPC

Title: Clinical Director, Austin Biofeedback & EEG Neurofeedback Center

Organization you are affiliated with: Texas Counseling Association

City: Austin

State: Texas

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

I am strongly AGAINST this proposal because:

- 1) Recommendation 3.2 places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Professional Counselors which includes licensed professional counselors as well as public members ensures that all LPCs are well trained and adhere to high professional standards. The impact of LPCs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.
- 2) Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Professional Counselors must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree.

Any Alternative or New Recommendations on This Agency: Leave things as they currently are to protect the public!
We must ensure the oversight of LPCs by an independent regulatory board that includes experienced licensed professionals.

My Comment Will Be Made Public: I agree