

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 27, 2014 9:30 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 21:30

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Christopher

Last Name: Roubieu

Title: LMSW

Organization you are affiliated with: n/a

City: Austin

State: Texas

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

Regarding the proposed move of the Texas State Board of Social Worker Examiners, Texas State Board of Examiners of Professional Counselors, and the Marriage and Family Therapist licensing boards to the Texas Department of Licensing and Regulation from DSHS, many of the social workers, licensed professional counselors and licensed marriage and family therapists I've talked to are concerned specifically about these two issues:

- 1) These professions make up the largest group of mental health providers in the state. Moving their licensing and regulating boards from state health services to the licensing board (which services non-Master's level professions, such as plumbers, HVAC techs and cosmetologists) will potentially send the message that we are somehow "lesser" professions than nurses, doctors, psychologists or psychiatrists when it comes to providing mental health care. This could damage not only our professional standing in the field, but also potentially decrease our reimbursement rates through insurance and, of course, our earning potential overall. Additionally, the Texas Department of Licensing and Regulation has no experience with health care and/or mental health care delivery, or the various ethical and legal requirements of these professions.
- 2) All other states of which we are aware have these professions licensed through their version of DSHS - will this proposed move limit the ability of Texas social workers, licensed professional counselors and licensed marriage and family therapists from being able to transfer their licenses to other states? If so, this will likely result in a huge talent drain in the state in these fields, as few professionals would willingly give up this portability. It would also decimate social work and counseling programs in our state schools. These fields already operate in a state of chronic understaffing, which greatly impacts our ability to deliver services to consumers. My concern is that this move could cause an enormous shortage of mental health professionals in Texas which would have devastating consequences for the mentally ill in our state.

Any Alternative or New Recommendations on This Agency: There are certainly problems with the current management of the Texas State Board of Social Worker Examiners, Texas State Board of Examiners of Professional Counselors, and the Marriage and Family Therapists due to funding/staffing issues at DSHS (which are clearly outlined here:

<https://naswtx.site-ym.com/news/177674/Sunset-Commission-Recommendations-on-Social-Work-Licensing-Board.htm>).

However, this proposal seems likely to create new problems in mental health care delivery for the state, as well as exacerbating existing problems.

Ideally, the solution would be to fully fund and staff DSHS to alleviate existing problems. If increased funding is not a possibility at this time, I would certainly rather keep the status quo than risk a "solution" with such potentially devastating effects for so many people.

My Comment Will Be Made Public: I agree