

**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 11:54:51 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 06, 2014 11:19 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 - 11:18

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Ronald

Last Name: Saenz

Title:

Organization you are affiliated with: Texas Counseling Association

City: Richmond

State: Texas

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

I am in opposition to Recommendation 3.2 to transfer the Texas State Board of Examiners to the Texas Department of Licensing and Regulation.

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.

Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Professional Counselors, Marriage and Family Therapists and Social Workers 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: Recommendation 3.2 is removed, and the Texas State board of Examiners of Professional Counselors as well as the Marriage and Family Therapist and Social Worker licensing boards are not reconstituted, and left to function as they currently do.

My Comment Will Be Made Public: I agree