

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 11:58:27 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 06, 2014 9:32 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 - 09:31

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Lisa

Last Name: Schulz

Title: Clinical Associate Professor

Organization you are affiliated with: University of North Texas

City: Denton

State: Texas

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

With great concern, I write to implore you as policymakers to consider the implications of Recommendation 3.2 by consulting the stakeholders. As I understand the proposed restructure, no member of the mental health profession will be representative, and no consideration will be given to the depth of training and preparation Licensed Professional Counselors (LPCs) undergo. We are graduate level professionals who undergo extensive (60 hour degree programs) plus 3000 post-Master's, supervised internships and require our regulatory process to rise to this level of concern for the public welfare.

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: Collaborate with the Texas Counseling Association (TCA) to identify an appropriate, feasible, and meaningful process for all stakeholders - this is what we do best.

My Comment Will Be Made Public: I agree