

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 23, 2014 8:05:05 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 20, 2014 9:36 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 21:35

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Juliane

Last Name: Shore

Title:

Organization you are affiliated with:

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Re: Recommendation 3.2 Opposed. I am writing to express my opposition to the recommendation to dissolve the LPC, LMFT and LCSW boards and move the regulation of these Boards out of the regulation of DSHS. I oppose this change because these licenses need to be regulated by boards that include people who hold the same license, i.e. masters level clinicians.

Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Marriage and Family Therapists, Professional Counselors, 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. I am concerned for the safety of the public if the regulation of these professional licenses move to the TDLR which does not have the necessary experience to properly guide the licensing and disciplinary actions of such health care professions.

Any Alternative or New Recommendations on This Agency: Allow the LPC, LMFT and LCSW licenses to be continued to be regulated by the boards currently in DSHS.

My Comment Will Be Made Public: I agree