

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Sunday, June 08, 2014 6:37:30 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 06, 2014 10:02 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 - 22:02

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jennifer

Last Name: Smothermon

Title: LPC, Supervisor; LMFT, Supervisor

Organization you are affiliated with: concerned citizen of Texas

City: Abilene

State: Texas

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

As a citizen of Texas, I would like to express my concerns about Recommendation 3.2, which places the public at risk. The Texas State Board of Examiners of Marriage and Family Therapists and the Texas State Board of Examiners of Professional Counselors are charged with protecting the public and providing regulatory oversight of the two professions. The regulatory oversight provided by these boards, which includes professional members (Licensed Marriage and Family Therapists and Licensed Professional Counselors, respectively) along with public members ensures that all LMFTs and LPCs are well trained and adhere to high professional standards. The impact of LMFTs and LPCs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals in each discipline.

It is important to note that the professions are distinct and have separate professional identities and theories under which their licensees practice.

Combining boards would blur those distinction, potentially offering fewer services to populations that are already underserved in the state.

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: Maintain separate boards for Licensed Marriage and Family Therapists, Licensed Professional Counselors, and Licensed Social Workers, comprised of professional and public members. Increase funding for Investigators who investigate complaints for these boards in order to expedite

the process and increase public safety.

My Comment Will Be Made Public: I agree