

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, June 17, 2014 8:39:05 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 16, 2014 8:09 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 16, 2014 - 20:09

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Megan

Last Name: Van Meter

Title: Licensed Professional Counselor-Art Therapist (LPC-AT)

Organization you are affiliated with: licensee of the LPC board under DSHS

City: Austin

State: Texas

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

Hello. The proposed changes have the potential to affect the hybrid professional counselor-art therapist license ("LPC-AT") in Texas. Currently art therapists have title protection through the LPC Act (state law), and now the Texas Sunset Advisory Commission Staff Report ([https://www.sunset.texas.gov/public/uploads/files/reports/DSHS%20Staff%20Report\\_1.pdf](https://www.sunset.texas.gov/public/uploads/files/reports/DSHS%20Staff%20Report_1.pdf)) is recommending a transfer of the professional counselor license (and thus the art therapy specialty designation) to the Texas Department of Regulation and Licensing (<http://www.tdlr.texas.gov/>).

The existing license is offered through the Texas Department of State Health Services and is overseen by an independent board (<http://www.dshs.state.tx.us/counselor/default.shtm>). If the proposed change is accepted by the state legislature, the state counseling board will be dissolved and management of the licensing program will be transferred to the TDRL in conjunction with an advisory committee. I am concerned that this could jeopardize existing title protection for art therapists; it remains unclear how this proposed change would affect the situation for art therapy/art therapists in Texas.

Any Alternative or New Recommendations on This Agency:

The proposed change could be an opportunity to address the need for LPC-ATs to have representation on any newly created advisory board in order to better protect the public. Currently, the LPC board in Texas does not have any LPC-ATs; thus when the board makes decisions that affect the practice of art therapy in Texas, art therapists are not in on the discussion. Similarly, rules and regulations that should be in place to ensure public protection related to art therapists/art therapy are missing due to the lack of LPC-AT representation on the board. Consider this

example: an individual has to have achieved board certification with the Art Therapy Credentials Board, the national credentialing organization in art therapy, in order to obtain the LPC-AT. The LPC board's code of ethics does not cover art therapy-specific considerations like the ATCB's Code of Professional Practice does, but the LPC board does not require that LPC-ATs maintain their ATCB credentials once they're earned the state license. This potentially allows LPC-ATs to drop their affiliation with the ATCB and thus not have to worry about ethical standards that are art therapy-specific, which is not in the best interest of the public.

My personal stance is that any newly created advisory board should--at its inception--consult with the American Art Therapy Association (the national membership organization in art therapy) and the Art Therapy Credentials Board for guidance related to the LPC-AT. Such consultations are a part of the recommended plan in the Texas Sunset Advisory Commission Staff Report, but I am concerned about the national art therapy organizations being left out of the conversation as has been the case in the past.

While the LPC-AT situation in Texas is far from perfect, the possibility of a major change such as the one that's proposed could serve as an opportunity to bring this state's standards for art therapists/art therapy more in line with national standards (and other states' standards) that better protect the public. Thank you for taking the time to address this important matter.

My Comment Will Be Made Public: I agree