

**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 6:34:27 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 06, 2014 5:06 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 - 17:06

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: KARL

Last Name: WITT

Title:

Organization you are affiliated with:

City: TYLER

State: Texas

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

Recommendation 3.2 of the Sunset Report proposes the abolition of the licensing boards for Counseling, Marriage and Family Therapy, and Social Work and replacing them with TDLR advisory committees. I am opposed to this recommendation for several reasons:

- The report writers incorrectly state that the 12 areas are equivalent in terms of licensure and training. Most of the 12 areas do not require even a bachelor's degree. Counseling and Marriage and Family Therapy will soon both require 60 hour master's degrees, and many programs already have this requirement. While there are bachelor's-level social workers, master's-level clinicians are preferred by organizations hiring for their expanded training, clinical supervision, and management abilities. All three professions require extensive interaction with clients as part of their training process.
- Part of the rationale from the report writers is that transferring these 12 areas will allow DSHS to focus on "its core public health mission." Mental health is a crucial component of public health. Federal law explicitly recognizes the equivalence of physical and mental health, and State of Texas reports as recently as Spring 2014 note this equivalency. Texas law classifies social work, marriage and family therapy, and counseling as health professions. Moving social work, counseling, and marriage and family therapy out of DSHS actually fragments the delivery of health services rather than consolidating them.
- Removing the rule-making authority of the licensing boards for counseling, social work, and marriage and family therapy places the public at risk. These boards consist of public members and representatives from the professions. The professionals recognize potential areas of harm in training and practice and are able to immediately address them in ways that an advisory board could not.

Thank you for your attention.

Any Alternative or New Recommendations on This Agency: While I cannot speak to the other 9 areas, the Social Work, Counseling, and Marriage and Family licensing boards should maintain their current structure and authority.

My Comment Will Be Made Public: I agree