



TEXAS COUNSELING ASSOCIATION

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The Texas Counseling Association is a membership organization representing more than 7,000 professional counselors in an array of work settings across Texas. We appreciate the opportunity to submit comments on the Sunset Advisory Committee Staff Report, *Health Licensing Consolidation Project*.

TCA agrees with the staff recommendation that the Texas State Board of Examiners of Professional Counselors be reauthorized for another 12 years. There are more than 22,000 Licensed Professional Counselors in Texas who work with some of our most fragile citizens. The regulation of these professionals by an independent board representing both professional counselors and the public is essential to ensure that every LPC in Texas is well trained, uses appropriate treatment protocols and maintains high ethical standards.

TCA does not agree with the Sunset Staff recommendation to house the boards who regulate mental health professionals at the Texas Department of Licensing and Regulation and to change their status to advisory committees. The Texas Department of Licensing and Regulation has no experience in the regulation of mental health professionals. The staff recommendations do not take into consideration the vulnerability of clients who receive mental health services. The public will not be protected if their recommendation is enacted.

In addition, advisory boards are not reimbursed for travel costs to attend meetings. The professional members who serve on the Texas State Board of Examiners of Professional Counselors do so at great personal expense as their service takes many hours away from their private, professional practices. The model proposed by the staff will result in the loss of well qualified board members who could simply not afford to serve. Again, this will not protect the public.

TCA is collaborating with other behavioral health professional associations on an alternative recommendation. We propose that Chapter 501 of the Texas Occupations Code be amended to transform the existing psychology agency into the Texas Behavioral Health Professions Agency, where the Texas State Board of Examiners of Professional Counselors, the Texas State Board of Examiners of Marriage and Family Therapists, the Texas State Board of Social Worker Examiners and the Texas State Board of Examiners of Psychologists will be housed. This entity would provide one administrative structure for the behavioral health licensing boards and would consolidate operations to take advantage of economies of scale. This model would mitigate the administrative inefficiencies identified by the Sunset Staff, create the opportunity for consistent regulation and provide the protection the public needs when receiving behavioral health services.

Thank you for your consideration. If you have any questions or need additional information, please contact Jan Friese, Executive Director of TCA at jan@txca.org or 512-472-3403, ext. 11.