



November 30, 2016

VIA ELECTRONIC MAIL
sunset@sunset.texas.gov

Sunset Advisory Commission
Post Office Box 13066
Austin, Texas 78711

*Re: Sunset Advisory Commission Staff Report on the
Health Licensing Consolidation Project*

Dear Sunset Advisory Commission Members and Staff:

The Texas Podiatric Medical Association (TPMA) is a professional association with more than 675 members who are Doctors of Podiatric Medicine, often referred to as "DPMs", "podiatrists", or "podiatric physicians." The purpose of this correspondence is to provide comments on the Sunset Advisory Commission Staff Report on the Health Licensing Consolidation Project. Accordingly, we submit the following comments for your consideration.

Proposed Agency Consolidation

Based upon the Findings in the Sunset Advisory Commission Staff Report on the Health Licensing Consolidation Project (*Consolidation Staff Report*), TPMA agrees that the key problems shared by small health licensing boards grow from one root challenge: limited staff and fiscal resources to dedicate to core functions and respond to changing demands. As noted in the chart on page 5 of the Consolidation Staff Report, the Texas State Board of Podiatric Medical Examiners (TSBPME) faces all eight of the core issues identified by the Sunset Staff.

In an effort to address these key problems, TPMA supported the Staff Recommendations for Change in Statute (Items 1.1 through 1.8) and Management

Action (Items 1.9 through 1.16) as enumerated in the Sunset Advisory Commission Staff Report for the TSBPME (see TSBPME Sunset Commission Staff Report, pages 9-14), which will reduce administrative burdens on TSBPME's agency staff, improve administrative efficiencies, improve licensing and enforcement outcomes, and better protect the public.

In this regard, it is important to note that the TSBPME has requested an additional position for a medical director as an exceptional item in its 2018-2019 legislative appropriations request (*LAR*). TPMA strongly supports this *LAR* because we are confident that the addition of a medical director will provide the increased manpower and expertise that will allow the TSBPME to successfully implement and achieve the changes necessary to conform to model licensing standards and best practices as enumerated in the TSBPME Sunset Commission Staff Report.

However, if the Commission members determine that agency consolidation is necessary in order to improve administrative efficiencies and economies of scale for the smaller health licensing agencies, TPMA strongly believes that it is in the State's best interest to accomplish this result by retaining the Texas State Board of Podiatric Medical Examiners as currently constituted (6 DPMs and 3 consumers appointed by the Governor) which going forward would retain its current statutory authority to regulate the practice of podiatry and the podiatric medical profession in the State of Texas. We firmly believe this model of peer regulation and licensing is necessary to maintain safe guards on patient safety and public health.

Thank you for your consideration. Please call if you have questions or require additional information at this time.

Respectfully submitted,



George T. Liu, DPM
President, TPMA