



TOTA

TEXAS OCCUPATIONAL THERAPY ASSOCIATION, INC.

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TESTIMONY TO THE TEXAS SUNSET ADVISORY COMMISSION DECEMBER 8, 2016

Good afternoon, I am Robin Clearman, an Occupational Therapist and President of the Texas Occupational Therapy Association (TOTA). I am a native Austinite, attended Southwestern University and UTMB Galveston, and have been a practicing occupational therapy in Texas for the past 33 years in Houston.

Thank you for the opportunity to speak before you today representing the Occupational Therapists of Texas. I appreciate all the hard work performed by the Sunset Commission Staff and their thorough investigation. TOTA agrees with the findings as printed in the initial report published in April 2016. We appreciate the Sunset Commission wanting to do what is right and what is best for the Texas consumer.

The state of Texas has nearly 15,000 licensed occupational therapy practitioners and Texas universities and colleges are graduating over 1,200 new practitioners each year. These numbers do not include new OT licensees moving into this great state.

Texas Occupational Therapy Association opposes the recommendation of the recent Health Licensing Consolidation Project Report to change the Texas Board of Occupational Therapy Examiners (TBOTE) to an advisory committee and thereby place the licensing and regulation for OTs under TDLR.

Consolidation of ECPTOTE would not create new efficiencies:

- TBOTE issues a license in 2.54 days vs. 10 days under TDLR
- TBOTE resolves a complaint in less than 4 months (118 days) vs. 7 months under TDLR.
- TBOTE utilizes its senior investigator to prioritize high risk

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complaints and is responsible for further prioritizing by seriousness of the offense.

- TBOTE assigns a number to each case and avoids exposing confidential information and any issue of personal data being shared.

The Health Licensing Consolidation Project Report included nine small health licensing boards.

- The report appears to arbitrarily decide to cut any board with fewer than 25 staff. ECPTOTE has 20.
- The problems outlined in the report do not apply to TBOTE or the ECPTOTE.
- As pointed out in the April Sunset staff report the cost to move TBOTE to TDLR would be \$440,000.
- No savings or reductions in staff were able to be identified by the LBB or TDLR and thereafter, TDLR indicated annual costs would be approximately the same.

I want to quote the original report, **"the executive council has been a stable, well-run agency with an experienced, capable staff."** There is no justification to change the existing structure of ECPTOTE or TBOTE.

We believe the ECPTOTE does a great job and actually sets the standard as to how a licensing and regulatory board should be operated.

Thank you.