

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: For LTC WEST: MFT Sunset Commission
Date: Monday, December 05, 2016 12:28:39 PM

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From: Jeff Holland
Sent: Monday, December 05, 2016 11:49 AM
To: Sunset Advisory Commission
Subject: For LTC WEST: MFT Sunset Commission

LETTER FOR SUNSET COMMISSION MEMBER

Dear Lt. Col. West,

I am writing to ask your support in keeping the Texas State Board of Examiners for Marriage and Family Therapists (TSBEMFT), which serves as the legal regulatory body in Texas over licensed marriage and family therapists (LMFTs) as an independent body connected with the state's healthcare delivery system.

The chief purpose and function of the Board is the protection of the health and safety of the public, regulating the qualifications and competency for a set of highly specialized, licensed mental health practitioners. The Board performs its function by establishing academic standards and continuing education requirements to keep pace with advances in the field, as well as ensuring that licensees meet and adhere to appropriate ethical and professional standards. The TSBEMFT, which is self-sustaining through the collection of practitioner licensure fees, has performed this vital regulatory function for the next 12 years.

The Texas Association of Marriage and Family Therapists does not support the move suggested by the Sunset Commission Staff Consolidation Report to the Texas Department of Licensing and Regulation, which we believe is not a good fit for the type of therapeutic services provided by LMFTs and that moving all of the mental health licensees away from the state's healthcare delivery system will aggravate access challenges, by weakening the recruitment of professionals into the field and doing little to dissuade the unfortunate, but prevalent discrimination associated with mental health problems.

The license of Marriage and Family Therapists is a nationally recognized health care provider license and is one the 5 Core Mental Health Licenses recognized by the United States Department of Health and Human Services. The national license carries some significance with regard to reciprocity and reimbursement. The TSBEMFT operates at no real cost to Texas tax-payers, since it funded by professional fees of licensees who depend upon the Board for ethics regulation enforcement, educational standard setting, rules formulations to help keep pace in an ever evolving industry, continuing education requirements and the answers to a multitude of questions as a licensee goes from student to new licensee to evolved practitioner. To move the TSBEMFT Board to TDLR and diminish the current regulatory and enforcement functions to merely an advisory board, ceding control of the profession to untrained appointees, will not only carry a fiscal note, but severely undermine the profession's ability to govern licensees in authentic peer review. In addition, relegating the Board to an advisory status will also stymie rule promulgation as the profession addresses constructive changes to meet new advances and best practices in the field.

Marriage and Family Therapist are at minimum Master's Level Health Care providers found in the Departments of Veterans Affairs, Family and Child Protection Services, Medicaid, the Justice system, Universities, Health Care Clinics and private practice.

As Health Care Providers Marriage and Family Therapist need to be attached to the health care system in Texas. I agree that TSBEMFT can improve its regulatory functions, including reforms in the speed, privacy, and due process on how complaints are handled, but we feel this can be addressed through internal process changes instead of moving the TSBEMFT Board to TDLR. Only through a robust mental health care delivery infrastructure, where mental health professionals are viewed and valued as an equal priority with physical health, can the state reap the tangible benefits of strengthening and supporting individuals to reach their potential.

For these reasons I am asking that you do not follow all of the Sunset Staff recommendations. Instead, I'm asking that you support a recommendation that keeps LMFTs and the other mental health profession connected to the state's healthcare delivery system and that the licensure boards retain their autonomous rulemaking authority.

I appreciate your time and your dedication to serving all the most vulnerable citizens of Texas.

Respectfully,

Jeffrey L Holland - LMFT