

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Sunset Advisory Commission Staff Report on Health Licensing Consolidation
Date: Tuesday, November 29, 2016 4:47:18 PM

From:
Sent: Tuesday, November 29, 2016 4:30 PM
To: Sunset Advisory Commission
Subject: Sunset Advisory Commission Staff Report on Health Licensing Consolidation

Dear Sunset Advisory Commission:

I am writing to provide input on the recommendations contained in the Staff Report on Health Licensing Consolidation.

I am opposed to Recommendation 1.1 to include the Physical Therapy Board with the health occupational licensing programs slated to be transferred to the TDLR Health Professions Division in the next legislative session.

It may well be that in the end an umbrella organization to oversee health professions will result in economies of scale that will allow for protection of the public at reduced regulatory and financial cost. However, TDLR oversight of Health Professions remains relatively new and is burdened with the responsibility of new regulation of a large number of licensing programs, many of which have not been well run and have a number of issues. I believe the time frame for incorporation of all the new health professions is too short and that TDLR would benefit from additional time to ensure that anticipated economies of scale do in fact take place and that the burden of consolidating disparate organizations under one IT system does not incur unanticipated costs.

The initial recommendation from the Sunset Advisory Commission staff was to continue the Physical Therapy board in its current configuration until the next Sunset Review. It based the recommendation not to transfer regulation of physical therapists to TDLR its findings that the Physical Therapy Board was a "stable, well run organization with experienced capable staff" and that "the cost of transferring these regulations to TDLR, largely to upgrade computer systems, and the ongoing effort by both TDLR and the medical board to assimilate 17 regulatory programs from DSHS, tipped the scales in favor of recommending continuing the agency with its current structure."

I believe that the public and physical therapists would be served by continuing the Physical Therapy Board as an independent regulatory board at this time, giving the TDLR Health Professions division time to consolidate its current regulatory responsibilities and insure that its planned integration of IT functions and administrative practices do indeed result in improved oversight and savings.

I am a physical therapist who has moved to Texas in the past year. I owned a practice in the state of Maryland where the Physical Therapy Board is regulated by the Department of Health and Medical Hygiene with oversight over all medical professions including physicians. I have seen first hand how the sheer size of large regulatory agencies can cause difficulty in being responsive to their licensees as well as the public. I commend the Sunset Commission for regular review of agencies to insure they are still needed.

I would add one additional thought. This process with the review of the Physical Therapy Board has seemed unnecessarily opaque to the public. Your own website states that public participation is the cornerstone of the sunset process, yet when I look at the Sunset Review Commission website for information about the Physical Therapy Board, all I find is the early recommendation to continue the board. While I am representing myself with this letter, it is only through participation in my

professional association that I was informed that the earlier recommendation was postponed pending the above referenced consolidation report. The time given for the public to respond over the holidays to this last minute change has been short, especially given that many physical therapists thought they had already responded to the review in the public comments for the April 2016 report. A more transparent process, with timely online publication of applicable reports would make the process more in keeping with a public service.

Thank you for your consideration.

Sincerely,

Ronna R. Keagle, PT, DPT, OCS