LETTER FOR SUNSET COMMISSION MEMBER

Dear Larry Gonzales,

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 held within the Texas healthcare delivery system.

I do not support the move suggested by the Sunset Commission Staff Consolidation Report to the Texas Department of Licensing and Regulation, which I 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. 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 TSBEMFT operates at no real cost to Texas tax-payers, it is 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 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 limited 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.

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,

PhD, LPC-S, LPC, LCCA

Amanda Martin