

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, May 01, 2018 3:44:46 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, May 01, 2018 3:43 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS STATE BOARD EXAMINERS MARRIAGE AND FAMILY THERAPISTS

First Name: Morton

Last Name: Nixon

Title: Counseling Student

Organization you are affiliated with: Southern Methodist University

Email:

City: Dallas

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
Hello,

I am a counseling student who is entering the field after a decade in the corporate world. I will be graduating in a little less than a year and hoping to begin working. The disorganization and delay at the organizational level is a major concern for many potential mental health professionals. The proposed changes could help the profession and thereby the general public in Texas who directly benefit from work of mental health professionals.

I agree with your finding that the continued administrative attachment of the marriage and family therapy, professional counseling and social work boards to a large agency is still not working. They are underfunded and understaffed. The dysfunction created by such a model places the livelihoods of licensees in jeopardy and puts the public at risk.

I support the staff recommendation that the consolidated agency [TSBEMFT, TSBEP, TSBSWE and TSBEP] structure of the Behavioral Health Executive Council presents the best approach to align the regulation of these behavioral health professions and elevate the attention and oversight of these programs and that more efficient and effective regulation of these professions will not only provide improved services and increased responsiveness to licensees but also will better protect behavioral health care consumers.

I disagree with the staff recommendation that the executive council would be composed of one public member appointed by each of the four boards and an independent presiding officer appointed by the governor. I believe you should follow Texas Counseling Association's recommendation that the structure of BHEC, as proposed during the last Sunset Review, should include one professional and one public member appointed by each board, with the presiding officer appointed by the Governor. My opinion is based on the following:

None of the boards that regulate health professionals is composed exclusively of public members. In fact, the Sunset Commission staff recommendations for the Board of Medical Examiners does not propose to restructure that Board to create an all or majority public member structure.

The original recommendation for BHEC still creates a public majority board. Including professional members brings expertise that would likely be lost if BHEC was composed of public members with professional members relegated to “ex officio” roles.

The behavioral health regulatory boards currently housed at HHSC work collaboratively with respect for the uniqueness of each specialization. This is evidenced by their implementation of consistent disciplinary matrices and alignment of rules where appropriate.

Including professional members on BHEC is much more likely to enhance consistency in standards than interference on standards of practice, licensing and enforcement decisions since no profession would hold a majority on BHEC.

Thank you for the opportunity to record my comments about this very important issue.

Respectfully,

Any Alternative or New Recommendations on This Agency: NA

My Comment Will Be Made Public: I agree