

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, April 30, 2018 2:11:54 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, April 30, 2018 1:31 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: Jessica

Last Name: Norton

Title:

Organization you are affiliated with:

Email:

City: FRISCO

State: Texas

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

I appreciate the opportunity to comment on the latest Sunset Review findings.

As a graduate student in the counseling department of my university, I am passionate about this field and its future. This is why I am a proud member of the American Counseling Association. Additionally, the skills that I learn in graduate school are also applicable to my current profession as a teacher at an alternative high school.

Without this program and the people who support it, I would not have learned valuable skills to employ with my students and colleagues. As such, I am extremely invested in the future of this profession.

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. With each attachment constrained by varying deadlines, funding shortages, and overall organizational dysfunction, many new counseling professionals are not provided with the support they need as they enter the field. This model is not sustainable, and it creates an opportunity for mistakes to slip through. When mistakes are made internally, they will manifest externally as well, which puts our public in harm's way.

Because of these reasons, I do support the staff recommendation that the consolidated agency [TSBEMFT, TSBEPC, TSBSWE and TSBEP] structure of the Behavioral Health Executive Council presents the best approach to align the regulation of these behavioral health professions. I believe that having one consolidated council will 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.

However, 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 that the council needs to be comprised both licensed professionals as well as members of the public. 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.

Without the supervision of someone who has dedicated his or her life to this profession, I feel that we are doing new professionals as well the public a disservice, and are increasing the chance for future malfunction of this new system.

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

Respectfully,

Jessica Norton

Any Alternative or New Recommendations on This Agency:

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Respectfully,

Jessica Norton

My Comment Will Be Made Public: I agree