From:	Sunset Advisory Commission
To:	Cecelia Hartley
Subject:	FW: ECPTOTE and TBOTE
Date:	Tuesday, November 29, 2016 12:17:32 PM

From: Parmet, Kelly Michelle
Sent: Tuesday, November 29, 2016 12:12 PM
To: Sunset Advisory Commission
Subject: ECPTOTE and TBOTE

To whom it may concern,
Please save our government and taxpayers' time and money!
I am writing to request that ECPTOTE and TBOTE remain their own boards. My colleagues and I are **opposed** to the proposal to move those boards under the Texas Department of Licensing and Regulation Health Professions Division. Reasons to support our argument:

- Since its creation in 1993, ECPTOTE has included more public members on the board than professional members. Therefore, there are no concerns for anti-trust violations under the current board design.
- Under the current board (TBOTE), it takes on average 2.54 days to issue a license to a clinician. Under the Texas Department of Licensing and Regulation (TDRL), it takes 10 days to issue a license. Therefore, the best practices for time needed to issue a license shows that TBOTE is more efficient, time saving, and cost-effective.
- Regarding the time require to resolve a complaint, currently on average TBOTE resolves complaints in 118 days (less than **4 months**). TDLR resolves a complaint in **seven months**. The longer it takes to resolve an issue, the more money it requires.
- Regarding the prioritization of high-risk complaint, TBOTE addresses all complaints immediately. The TBOTE senior investigator is responsible for further prioritizing cases by degree of seriousness of the offense.
- TBOTE assigns all cases a case number. No personal data is shared. Therefore, it eliminates the exposure of confidential health information during the complaint process.
- Our agency has been proven to be extremely efficient. Despite TBOTE being a small agency, it has proven to be more efficient and cost-effective. TBOTE shares resources with other boards through the Health Professions Council.
- Based on TDLR's estimates, and in consultation with Legislative Budget Board staff, Sunset staff has determined that such a move would **not** result in a reduction in personnel or cost-savings. Therefore, undermining a major rationale for the move.
- We have found no justification for transferring more than 38,000 physical and occupational therapy licensees, at a time when TDLR is inheriting 13 DSHS programs whose combined licensee population is more than 67,700. This requires a high threshold.

Most importantly, moving TBOTE and ECPTOTE to the new board of TDRL would create costs and NOT cut them. As pointed out in the April Sunset staff report on ECPTOTE and TBOTE, the cost to move TBOTE to TDLR would be $440,000 and no savings or reductions in staff were able to be identified and thereafter, TDLR indicated that annual costs would be approximately the same. Therefore, the report is saying that TDLR indicates that it would need the same number of

Board staff, Sunset staff has determined that such a move would not result in a reduction in personnel or cost-savings. Therefore, undermining a major rationale for the move.

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Most importantly, moving TBOTE and ECPTOTE to the new board of TDRL would create costs and NOT cut them. As pointed out in the April Sunset staff report on ECPTOTE and TBOTE, the cost to move TBOTE to TDLR would be $440,000 and no savings or reductions in staff were able to be identified and thereafter, TDLR indicated that annual costs would be approximately the same.

Therefore, the report is saying that TDLR indicates that it would need the same number of employees as the current executive council and a one-time cost of $440,000 to pay for transferring the licensing data from the current executive council to one of the TDLR's licensing systems. Plus, an additional annual cost of approximately the same amount thereafter.

The report went on to state, "the executive council has been stable, well-run agency with an experience, capable staff. There is no justification to change the existing structure of ECPTOTE or TBOTE."

It is recommended that the Sunset Advisory Commission adopt Recommendation 4.1 from the original report on ECPTOTE and TBOTE and do NOT include those entities in a recommendation for consolidation within TDLR.

I truly appreciate your time and the opportunity to comment on this matter.

Any Alternative or New Recommendations on This Agency: Request that ECPTOTE and TBOTE remain their own boards. Ask that they NOT be moved under the Texas Department of Licensing and Regulation Health Professions Division.

My Comment Will Be Made Public: I agree

From: Sunset Advisory Commission
To: Cecelia Hartley
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, November 29, 2016 12:26:22 PM

-----Original Message-----
From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Tuesday, November 29, 2016 12:26 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: HEALTH LICENSING CONSOLIDATION PROJECT

First Name: Kelly

Last Name: Parmet

Title: Senior COTA

Organization you are affiliated with: Harris Health System

Email:

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
Please save our government and taxpayers' time and money!

I am writing to request that ECPTOTE and TBOTE remain their own boards.
Reasons to support this argument:

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- Based on TDLR's estimates, and in consultation with Legislative Budget

employees as the current executive council and a one-time cost of $440,000 to pay for transferring the licensing data from the current executive council to one of the TDLR's licensing systems. Plus, an additional **annual** cost of approximately the same amount thereafter.

The report went on to state, "the executive council has been stable, well-run agency with an experience, capable staff. There is no justification to change the existing structure of ECPTOTE or TBOTE."

I ask that you recommend that the Sunset Advisory Commission adopt Recommendation 4.1 from the original report on ECPTOTE and TBOTE and do not include those entities in a recommendation for consolidation within TDLR.

I truly appreciate your time and the opportunity to comment on this matter.

Best regards,

Kelly Parmet, Senior COTA
Clinical Fieldwork Coordinator
Occupational Therapy
HARRIS HEALTH SYSTEM