

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, April 24, 2018 8:02:50 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, April 23, 2018 10:14 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: George

Last Name: Pate

Title: Core Faculty, Independent Consultant

Organization you are affiliated with: Capella University Marriage & Family Counseling / Therapy Program; and, Supervision and Training at Sundown Ranch, Inc.

Email:

City: Jacksonville

State: Texas

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

I am George A. Pate, PhD, a licensed marriage & family therapist (supervisor) and licensed professional counselor (supervisor). I am a core faculty member in the Marriage & Family Counseling/Therapy Program of Capella University and provide training and supervision consultation to Sundown Ranch in Canton, Texas. The purpose of this letter is to respectfully request that you reconsider the pending actions of combining the licensing boards under the exclusive auspices of public board members. The reasons for my request are:

- 1) While each of the professions address behavioral health, they approach their work from distinctly different perspectives and with different models of assessment and therapy. Specifically,
  - a. Psychologists are trained to assess via clinical interviews, mental status examinations, advanced psychological assessment and testing protocols (educational, objective and projective test procedures), and are trained in advanced approaches to experimental design and statistical analysis. Their primary models of therapy are individual and group therapy related, centering primarily around cognitive/behavioral and experiential models. They are the only professional group licensed to implement and interpret projective testing methods.
  - b. Marriage & family therapists (MFTs) are trained in individual assessment, diagnosis and treatment approaches. However, MFTs are specialists in assessing system interactions, resolving problems through interventions in family and community systems, and in rapid resolution of what many consider to be persistent individual problems. Rather than focusing on pathology, MFTs focus more specifically on the process of change, selecting the smallest interventions that produce the most lasting positive change. Primary therapy models are system-specific rather than the individually oriented models of psychology. No other discipline assesses and targets systemic interactions this rigorously.
  - c. Professional counselors are primarily trained in individual assessments, educational testing, certain objective tests, clinical interviews, and in providing primarily group and family therapy.

The primary models of therapy are the individually oriented approaches to cognitive/behavioral and experiential therapies. Their areas of focus also include specialties in school counseling and play therapy.

d. Clinical social workers address a range of administrative and therapeutic functions including social protection systems, systems related to public welfare, and act as employees or consultants to hospitals, treatment centers, hospice organizations, and educational institutions. Many clinical social workers are specialists in assessments, treatment planning and treatment, often approaching treatment from a cognitive/behavioral approach.

2) Monitoring the specific functions of these professions requires specific training and understanding of their mutually exclusive capabilities.

Combining the boards under a central organization would jeopardize the unique functions of each, resulting in a "leveling process" in which the public would be compromised by the losses of these functions. I am particularly concerned with the impact of this process on the field of marriage & family therapy, since the orientation of this profession is distinctly different from that of any other.

3) In addition, I have serious concerns about the removal of professional representatives from the board(s). The general public has limited understanding of the unique activities of each of these professions, and it is doubtful that they would be capable of interpreting the licensing standards and expectations of each of these professions.

Any Alternative or New Recommendations on This Agency:

4) I sincerely hope that you will consider this letter and:

- a. Maintain each of the above-mentioned boards as independent entities; and,
- b. Continue to require professional membership in each of the boards.

I appreciate your willingness to review and consider the concerns that I raised in this letter. Please let me know if additional clarification and/or information might be helpful.

Respectfully,

George A. Pate, PhD, LMFT-S, LPC-S  
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My Comment Will Be Made Public: I agree