

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, April 30, 2018 2:12:17 PM

---

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, April 30, 2018 2:09 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: Richard

Last Name: Vargas

Title: Graduate student and educator

Organization you are affiliated with: n/a

Email:

City: Dallas

State: Texas

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

Thank you for the opportunity to comment on the latest Sunset Review findings. I am a graduate student studying to be licensed professional counselor as well as a counselor educator and I currently teach high school English at an alternative school. I am looking to develop the following professional investments:

- Educate students on the importance of emotional social strategies for school
- Work as a school counselor and licensed professional counselor
- Currently belong Marriage and Family Therapy Association

In short, I am very invested and have a deep love for my future profession and the good work that counselor and educators do.

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. It also delays the process of licensure, which affects the lively hood of professionals.

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,  
Richard Vargas

Any Alternative or New Recommendations on This Agency: I recommend that this agency put into action the recommendations made concerning the report.

My Comment Will Be Made Public: I agree