

From: [Sunset Advisory Commission](#)
To: [Cecelia Hartley](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, November 18, 2016 10:15:19 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, November 18, 2016 10:00 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: HEALTH LICENSING CONSOLIDATION PROJECT

First Name: Timothy

Last Name: Williams

Title: M.B.A., O.T.

Organization you are affiliated with: Executive Council of Physical Therapy and Occupational Therapy Examiners

Email:

City: Dallas

State: Texas

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

While I understand the desire to make the smaller agencies more efficient by folding their administrative functions under one umbrella, I cannot advocate for doing so because "A private sector business would never structure its operations with multiple independent, duplicative processes." State agencies simply are NOT private sector businesses - they are not operated on the basis for a profit, similarly to a Church. They are operated based on a Mission of ensuring safe delivery of care is provided by those licensed under that agency. Each Board should have members of their profession at all times - they understand the issues that the licensed members are working for in the healthcare place, and help advocate for that to the Sunset Review. I am not at all convinced that the TDLR is "TDLR is well-positioned to effectively regulate health professions."

Any Alternative or New Recommendations on This Agency:

The ECPTOTE does not require fingerprinting - this should continue. The TDLR could help with making increases in efficiencies with some administrative functions, such as background checks.

Complaints should be handled by each agency, who holds the expertise, and knows and understands the functions of their licensees. Otherwise, using a separate all-encompassing agency like the TDLR would cause significantly more inefficiencies due to constantly having to educate their executives as to the functions and needs of the many different disciplines. The TDLR would not know when to seek-out the expertise from an advisory board on matters of professional standards, thus this function should remain with the ECPTOTE.

If improved services are sought, the TDLR could take on any new functions (and take on the costs).

My Comment Will Be Made Public: I agree