

The logo for the Texas Sunset Advisory Commission is a semi-circular arch with a thick black border. Inside the arch, the words "Texas", "Sunset", "Advisory", and "Commission" are stacked vertically in a bold, white, sans-serif font.

**Texas
Sunset
Advisory
Commission**

STAFF EVALUATION

*Anatomical Board of the
State of Texas*

**A Staff Report
to the
Sunset Advisory Commission**

1984

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SUMMARY

The Anatomical Board of the State of Texas was created in 1907, and is currently active. The board was established to regulate the distribution of cadavers among institutions who require such material for the advancement of medical science. To do this, the board currently approves institutions and facilities for the receipt and use of cadavers and provides for the proper distribution of bodies to the various institutions.

The need for the board's functions was analyzed, and the review indicated that there is a continuing need for state involvement in this area. The orderly supply and distribution of cadavers is crucial to the educational programs of various medical, dental, chiropractic, and mortuary science schools throughout the state. Approval of these institutions and the facilities in which the cadavers are utilized assures that the bodies will be used in an appropriate manner.

In general, the board is operated in an efficient and effective manner, however there are eight changes which should be made if the legislature decides to continue the agency. One other issue was identified that could offer potential benefit to the state, but would require a significant change in current state policy. The following outline describes the changes which should be made if the agency is continued, along with a discussion of the policy issue.

Approaches For Sunset Commission Consideration

I. **MAINTAIN THE BOARD WITH MODIFICATIONS**

A. Policy-making Structure

1. **The statute should be amended to reduce the size of the board.**

Currently the board is composed of 22 members, with two representatives from each of the eleven member institutions. The statute should be amended to reduce this to one representative from each institution. This would provide adequate representation, decrease costs, and reduce the board to a size which can operate more effectively as a decision-making body.

2. **The statute should be amended to specify the term of office for board members.**

No set terms are currently provided for board members. The statute should be amended to provide for two-year terms, with appointments to be made in the spring of odd-numbered years.

B. Overall Administration

1. The board should have statutory authority to collect fees.

The board currently collects fees for the receipt of cadavers by approved institutions, however, it has no statutory authority to make such collections. The fees are appropriate and the statute should be amended to give the board this authority.

C. Evaluation of Programs

1. Supply and Distribution

a. The statute should be amended to add the board as an approved donee under the Texas Anatomical Gift Act.

Currently, all of the institutions represented on the Anatomical Board are designated as appropriate donees of bodies under the Texas Anatomical Gift Act. However, the board itself is not included. When a body is donated to the state as opposed to a specific institution the board has, in effect, acted as the donee and assigned the bodies to approved member institutions. In order to clarify the board's authority, the statute should be amended to include the board as an appropriate donee under the Texas Anatomical Gift Act.

b. The statute should be amended to allow the board to promulgate rules for the transfer of bodies to approved institutions outside the State of Texas.

Currently, Texas has an excess supply of cadavers, while medical schools in other states are in need of additional bodies. The board should be given authority to transfer bodies, in excess of Texas' needs, to approved institutions out of state for the advancement of medical teaching and medical science.

2. Approval of Institutions and Facilities

a. The statute should be amended to clarify the board's authority to inspect and approve institutions and facilities for the receipt and use of cadavers.

The statute does not currently provide the board with specific authority to inspect institutions and facilities for the receipt and use of dead bodies. It appears appropriate for the board to have this authority to ensure that the facilities in which the bodies are

used meet basic health and safety standards, are secure from public access, and that remains can be properly disposed of by cremation. The statute should be amended to clearly state that the board has the authority to inspect and approve institutions and facilities for the receipt and use of dead bodies.

b. The statute should be amended to authorize the board to revoke authorization of an institution to receive and use dead bodies, rather than requiring a penalty bond to assure against the improper use of dead bodies.

Currently, the statute states that, in order to receive dead bodies, institutions shall post a \$1,000 bond stating that all bodies will be used only for the promotion of medical science. A better way to assure compliance would be to allow the board to revoke the authority of an institution to receive and use cadavers, or some lesser penalty, in the case of any improper use of a cadaver. It is recommended that the statute be amended to provide this authority and to remove the requirement that institutions post penalty bonds.

c. The statute should be amended to remove any authority of the Anatomical Board over animal experimentation.

The statute currently contains two references to the board's regulation of animal experimentation. However, the board has never exercised any authority in this area. State involvement appears unnecessary since federal law regulates all facets of animal experimentation. It is recommended that this authority be removed from the statute.

II. OTHER POLICY CONSIDERATIONS

1. Should the Anatomical Board be exempt from the State Funds Reform Act?

Currently, the board holds its funds outside the treasury. These funds amount to approximately \$2,500 per year. It appears that the board may fall within the State Funds Reform Act which would require their funds to be placed in the state treasury. Opponents of exempting the board from the State Funds

Reform Act argue that depositing funds in the treasury is necessary to ensure accountability and legislative control of state funds through the appropriations process. Proponents of this exemption to the Act argue that since the board's inception, it has operated at no expense to the state, funded through user fees and interest on reserve funds. They also argue that to require the board to go through the appropriations process would increase costs and require hiring a paid staff person, when accountability of the board's limited funds is assured through an annual state audit of the board.

AGENCY EVALUATION

The review of the current operations of an agency is based on several criteria contained in the Sunset Act. The analysis made under these criteria is intended to give answers to the following basic questions:

1. Does the policy-making structure of the agency fairly reflect the interests served by the agency?
 2. Does the agency operate efficiently?
 3. Has the agency been effective in meeting its statutory requirements?
 4. Do the agency's programs overlap or duplicate programs of other agencies to a degree that presents serious problems?
 5. Is the agency carrying out only those programs authorized by the legislature?
 6. If the agency is abolished, could the state reasonably expect federal intervention or a substantial loss of federal funds?
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BACKGROUND

The Anatomical Board of the State of Texas was established in 1907 and is currently active. The purpose of the board is to register and distribute human cadavers among institutions and individuals who require such material for the advancement of medical teaching and medical science. Originally, the board's only source of cadavers was limited to bodies required to be buried at public expense, or "unclaimed bodies". However, in 1961, the statute was amended to broaden the board's jurisdiction to include bodies "willed" for the purpose of advancing medical science. The board also approves institutions and individuals to receive and use cadavers, and ensures that the facilities where such material is used are suitable for that purpose.

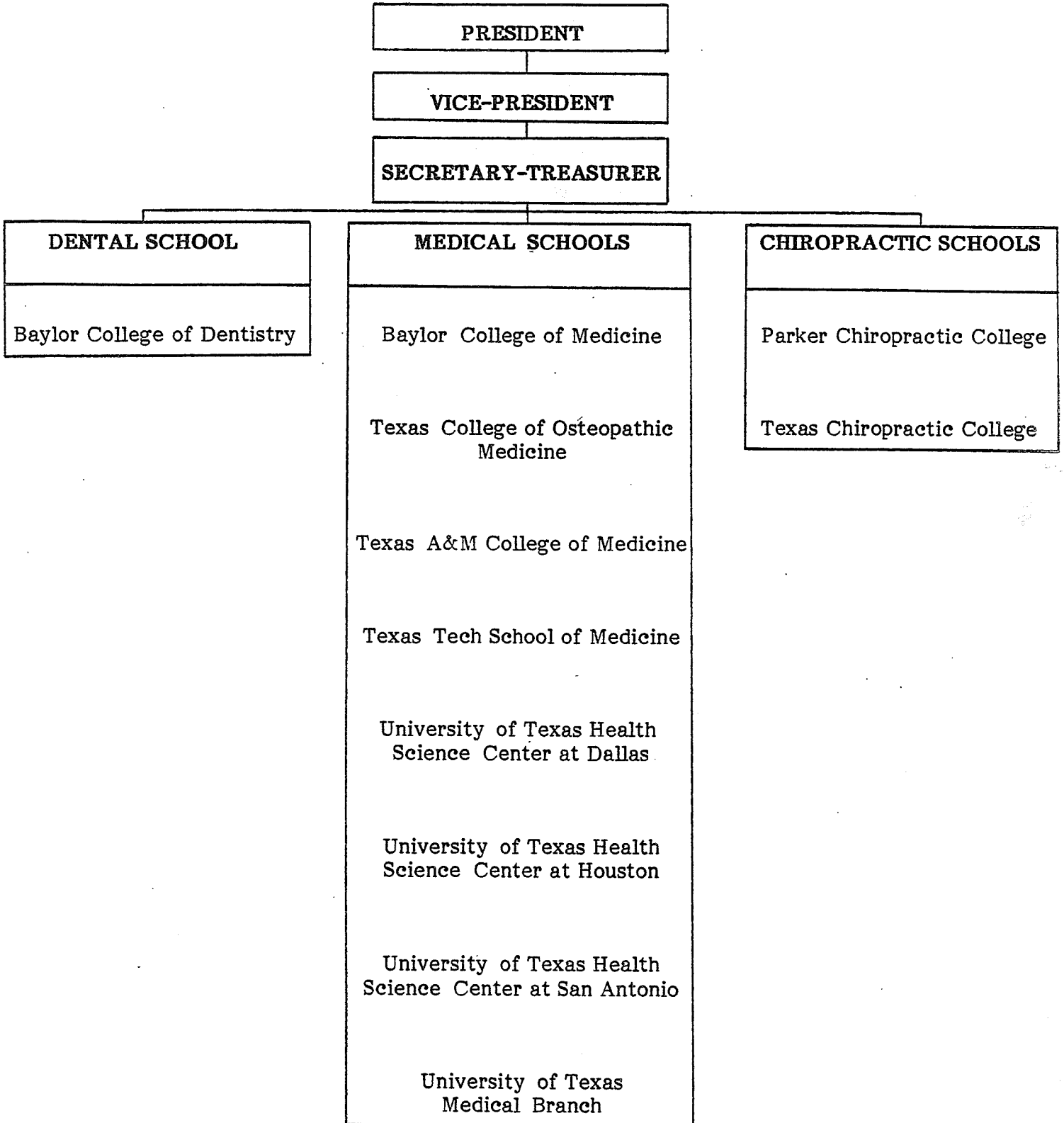
The board currently has 22 members, made up of two professors from each of the 11 medical, dental, and chiropractic schools in the state. The board meets annually to discuss problems of cadaver supply and distribution, and to consider any issues which require the board's approval. The board elects from among its members a president, vice-president, and a secretary-treasurer for three-year terms. These three elected officials constitute the executive committee and are authorized to transact all necessary board business between meetings. The secretary-treasurer is responsible for conducting all the routine activities which do not require formal action of the board or its executive committee. This includes the maintenance of records on the supply and distribution of cadavers, and management of the board's funds.

The Anatomical Board has no employees, and operated on an annual budget of \$2,570 for fiscal year 1983, funded through a \$2.00 fee levied on institutions for each body received. The board's organizational structure is depicted in Exhibit I on the following page.

In fiscal year 1983, the board distributed 1,594 cadavers to 17 institutions approved by the board. These include the 11 medical, dental, and chiropractic schools represented on the board, along with one hospital, one school of mortuary science, and four military hospital training programs.

Exhibit I

ANATOMICAL BOARD OF THE STATE OF TEXAS
Organizational Structure



REVIEW OF OPERATIONS

The evaluation of the operations of the board is divided into general areas which deal with: 1) a review and analysis of the policy-making body to determine if it is structured so that it fairly reflects the interests served by the board; and 2) a review and analysis of the activities of the board to determine if there are areas where the efficiency and effectiveness can be improved both in terms of the overall administration of the board and in the operation of specific board functions.

Policy-making Structure

In general, the structure of a policy-making body should have as basic statutory components specifications regarding the composition of the body and the qualifications, method of selection, and grounds for removal of the members. These should provide executive and legislative control over the organization of the body and should ensure that the members are competent to perform required duties, that the composition represents a proper balance of interests impacted by the board's activities, and that the viability of the body is maintained through an effective selection and removal process.

The Anatomical Board of the State of Texas is composed of 22 members, including a professor of anatomy and a professor of surgery from each of the medical and dental schools, and two professors from each incorporated chiropractic school in the state. The members are selected by the chief executive officer of each school. Currently, there is no set length of time that a member serves on the board.

The review of the policy-making structure focused on whether the structure and size of the board are appropriate to carry out its role effectively. The evaluation indicated that while the board represents a balance of interests impacted by their activities, the following changes should be made to modify the size of the board, and to specify a set term of office for board members.

The statute should be amended to reduce the size of the board.

As stated earlier, the board is composed of 22 members, with two representatives from each of the 11 member institutions. This is larger than most boards and commissions in the state, and has the potential for further growth as new schools are established. This composition was examined to determine if the

number of members could be reduced and still reflect a proper balance of representatives of those affected by the board's actions.

An analysis of the attendance at the board's annual meetings from 1978 to 1984 indicated that each member institution is rarely represented by more than one board member. The board has been able to function in this manner due to a rule adopted in 1979. This rule defines a quorum as a majority of the member institutions, not a majority of the board members. This practice appears to have three benefits. First, it provides each school with adequate representation. Second, it reduces the overall costs of the board's operation. Finally, it reduces the board to a size which can operate more effectively as a decision-making body. To reflect what has evolved from tradition and practice, the statutory composition of the board should provide for one representative of each of the member institutions, who is selected by that institution's chief executive officer.

The statute should be amended to specify the term of office for board members.

Board members currently serve for an indefinite period of time, usually until they retire or leave the institution they are representing. No term of office is prescribed either in statute or by the rules of the board.

In general, terms of office not otherwise fixed by the constitution cannot exceed two years. In order to bring the board into compliance with established state procedures and to provide board members with a time frame for their appointment to the board, it is recommended that the statute be amended to specify that board members be appointed for two-year terms. Appointments should be made in the spring of odd-numbered years, prior to the board's annual meeting. Members would be eligible for reappointment to the board at the discretion of the executive chief of the school they represent. Secondly, the board's rules should be amended to state that the president, vice-president, and secretary-treasurer of the board shall be elected for two-year terms to coincide with their terms on the board.

Overall Administration

The evaluation of the overall administration of the board focused on determining whether the administrative structure, the management policies and procedures, and the monitoring of these practices were adequate and appropriate for the internal management of the board's funds and functions. The board has no

paid personnel. The secretary-treasurer is responsible for conducting all the routine business of the board, including the management of the board's funds. The board has never received an appropriation from the state for its financial support. Since 1912, the board has set a minimal assessment fee for recording each cadaver received by an approved institution. The fees have always provided adequate funds for the board to remain self-sufficient.

The review indicated that the board's administrative operations generally function adequately. However, the following recommendation was made to ensure that the board is authorized by statute to collect fees.

The board should have statutory authority to collect fees.

The board has statutory authority to maintain records sufficient for identification of all cadavers received and distributed to approved institutions. This is being done and a fee of \$2.00 is charged to cover the costs of providing this service. However, the practice of charging a fee for a service delivered by a state agency requires statutory authority. Attorney General Opinion H-443 held that only fees expressly authorized by statute may be collected by state agencies. It appears appropriate that a fee be charged to cover the costs of providing this needed service, and the statute should be amended to permit the current practice.

Evaluation of Programs

For the purposes of evaluation, the activities of the Anatomical Board were divided into two major functions: (1) the supply and distribution of cadavers, and the maintenance of records on such, and (2) the approval of institutions and facilities for the receipt and use of cadavers. A description of the activities within each of these two areas follows, along with recommendations to improve or clarify related problems identified during the review.

Supply and Distribution

The major function of the board, and the reason it was originally established, is to ensure the equitable distribution of cadavers to medical and dental schools throughout the state for use in teaching and research. In fiscal year 1983, a total of 747 bodies were used in teaching various aspects of anatomy to approximately 2,617 students at 17 institutions.

There are three ways a body comes under the jurisdiction of the board: (1) it is an unclaimed body required to be buried at public expense, (2) a person "wills" their body to medical science, or (3) a decedent's family donates that person's

body to medical science. Most of the institutions involved have initiated "willed body programs", with the goal of becoming self-sufficient in obtaining cadavers for their use. Institutions which receive cadavers directly have first claim to them. However, the board ensures equitable distribution to all authorized institutions based on a minimum student to cadaver ratio of four to one. Currently, Texas has a surplus of cadavers, largely due to the success of the willed body programs.

In general, the board has operated efficiently to equitably distribute bodies to its approved institutions. The following recommendations are made to clarify two issues raised during the review.

The statute should be amended to add the Anatomical Board as an approved donee under the Anatomical Gift Act.

The Texas Anatomical Gift Act (Article 4590-2, V.T.C.S.) provides that an individual or a decedent's family may donate all or any part of that individual's body for transplantation and/or medical science. Appropriate donees listed under the Act include all of the institutions represented on the board, but not the board itself. This can lead to confusion when a person simply donates his body to "the state", without listing a specific donee. If the board was listed as an approved donee then it could officially accept the donation, and transfer it to the school most in need.

The review indicated that the board has been acting as a liaison on donations, assigning them to member institutions when one is not specified by the donor. This appears to be an appropriate action that should be continued. Therefore, the statute should be amended to include the Anatomical Board as a donee under the Anatomical Gift Act.

The statute should be amended to allow the board to promulgate rules for the transfer of bodies to approved institutions outside the State of Texas.

Currently, Texas has more cadavers than the institutions can use, largely due to the success of the "willed body programs". For example, in 1983, the board had 1,594 cadavers available, but only used 1,042. The board has received requests for cadavers from other states that do not have enough cadavers for use in medical

education and research. However, the statute only allows the board to distribute cadavers within Texas.

The Anatomical Board in the State of Florida has established a system so a body donated in Florida can be transferred to certain approved institutions in Georgia and Alabama. An option is provided on their "will forms" for an individual to authorize the Florida Anatomical Board to transfer their body out of state to an approved facility if, at the time of death, it is not needed in Florida. Also the Florida Anatomical Board is authorized to complete a "burial transmit form" to allow the body to be interred out of state.

Texas' Anatomical Board was originally created to ensure an equitable distribution of cadavers to appropriate institutions in the state for the advancement of medical teaching and medical science. Although the board's first responsibility is to the institutions within the state, medical science could be further advanced if the board was authorized to ship cadavers, not needed in Texas, to approved institutions in other states. Therefore, it is recommended that the statute be amended to allow the board to promulgate rules for the transfer of bodies to approved institutions out of state. These rules should make provision for (1) a site visit to the out-of-state institution requesting the transfer of bodies, with all costs borne by that institution, (2) completion of a burial transmit form to allow a body to be interred out of state, and (3) amendment of the current "will forms" to include an option authorizing the board to transfer the body out of state, if no Texas institution needs the body at the time of death.

Approval of Institutions and Facilities

For over 75 years the board has performed the function of approving institutions and individuals to receive, hold, and use human cadavers. The various institutions currently approved by the board include medical, dental, and chiropractic schools, along with hospital training programs and a school of mortuary science. Individual physicians are authorized by statute to receive cadavers but have not done so since the 1940's.

The process of obtaining initial approval from the board to receive cadavers centers around a site inspection conducted by at least two members of the board. The inspection is based on facility standards developed by the board in 1979. These standards include adequate means to protect the health and safety of people dissecting the bodies, provisions which assure that all areas are secure from public access and visibility, and requirements that remains are properly disposed of by

cremation. If deficiencies are found, a reinspection occurs once the necessary corrections have been made. Following the site visit(s), the inspection team reports to the board, and upon acceptance of the report by a majority of the board, the institution is approved.

All approved facilities are reinspected at least every five years by a member of the board from an institution other than the facility being inspected. Unnecessary delay in correcting deficiencies uncovered by reinspection may, by majority vote of the board, result in withdrawal of approval and suspension of authorization to receive and hold bodies.

The board has also adopted rules regarding the investigation of situations involving the abuse of a corpse. An inquiry is conducted, and the chief executive officer of the school involved is responsible for taking appropriate action including criminal prosecution. Failure to act may result in the board suspending the institution's authorization to receive and hold bodies.

The review of the board's process for approving institutions and facilities resulted in the following two recommendations which would amend the statute to conform to the board's current practices.

The statute should be amended to clarify the board's authority to inspect and approve institutions and facilities for the receipt and use of cadavers.

The Anatomical Board's statute currently provides that only institutions designated by the board shall be authorized to receive and use cadavers, however, no specific authority is granted for the board to inspect the facilities involved. The board has taken the position that in order to appropriately designate institutions to receive and use such material, it is necessary to inspect the facilities in which the cadavers will be utilized. The board promulgated rules in 1979 regarding facility standards and inspections necessary for an institution to be approved to receive and use cadavers. It appears appropriate that the board have the authority to set standards and inspect facilities which receive cadavers under the purview of the board. This ensures that these facilities are properly equipped to handle and use cadavers in a healthful and safe environment, secure from public access and visibility, and that remains can be disposed of appropriately by cremation. To resolve any uncertainty about the board's authority, the statute should be amended to clearly state that the board has the authority to inspect and

approve institutions and facilities for the receipt of cadavers. This will conform to the board's current practices, and clarify this authority in statute.

The statute should be amended to authorize the board to revoke authorization of an institution to receive and use cadavers, rather than requiring a penalty bond to ensure proper use of cadavers.

The Anatomical Board's statute currently prohibits institutions from receiving cadavers until a \$1,000 bond is posted stating that all bodies received will be used for the promotion of medical science. The board indicates that the bond process is an out-of-date and ineffective method for ensuring that institutions appropriately use cadavers. Bonds of this type are difficult to obtain, do not provide a range of sanctions for violations, and do not function as a deterrent to improper use of cadavers. A more appropriate approach would be to authorize the board to investigate any alleged improper use of cadavers, and to provide that institutions found in violation may lose authorization to receive cadavers, or some lesser penalty as the full board may determine. The board currently has rules which provide for this approach, however, the penalty bond is still required by statute. Therefore, it is recommended (1) that the board be authorized in statute to revoke authorization of an institution or impose some lesser penalty for the improper use of cadavers; and (2) that the requirement for an institution to post a penalty bond be removed from statute.

The statute should be amended to remove any authority of the Anatomical Board over animal experimentation.

The Anatomical Board's statute currently contains two references to animal experimentation. Basically the statute, which was written in 1907, gave the board the power to authorize bonded schools or physicians to experiment on "lower animals" for the promotion of medical science (Articles 4587 and 4588, V.T.C.S.). The board has never exercised this power and feels that it would be inappropriate to do so in the future. State regulation appears unnecessary since the various facets of animal experimentation are covered by federal law and the regulations of the National Institute of Health. Therefore, it is recommended that the authority of the Anatomical Board over experimentation on lower animals be deleted from statute.

EVALUATION OF OTHER SUNSET CRITERIA

The review of the agency's efforts to comply with overall state policies concerning the manner in which the public is able to participate in the decisions of the agency and whether the agency is fair and impartial in dealing with its employees and the general public is based on criteria contained in the Sunset Act.

The analysis made under these criteria is intended to give answers to the following questions:

1. Does the agency have and use reasonable procedures to inform the public of its activities?
 2. Has the agency complied with applicable requirements of both state and federal law concerning equal employment and the rights and privacy of individuals?
 3. Has the agency and its officers complied with the regulations regarding conflict of interest?
 4. Has the agency complied with the provisions of the Open Meetings and Open Records Act?
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EVALUATION OF OTHER SUNSET CRITERIA

The material presented in this section evaluates the board's efforts to comply with the general state policies developed to ensure: 1) the awareness and understanding necessary to have effective participation by all persons affected by the activities of the board; and 2) that board members are fair and impartial in their dealings with persons affected by the board.

Open Meetings/Open Records

The review of the board's compliance with the Open Meetings Act indicated that the board has filed timely notices of their annual meetings with the Office of the Secretary of State. Minutes of their annual meetings are available to the public upon request, and are filed with the State Library's Publications Clearinghouse and the Legislative Reference Library. The board is also in compliance with the Open Records Act. They consider all of their records open to the public for inspection upon request.

EEOC/Privacy

The criteria related to equal employment and the rights and privacy of individual employees were not applicable as the Anatomical Board employs no staff.

Public Participation

The board's operations were examined to determine if the general public and those affected by the board have been informed of its activities. While the board has no written policy regarding public participation, their annual meetings are open to the public, and any proposed rules appear in the Texas Register providing the public with the opportunity to comment. In addition, all of the member institutions have developed individual programs to inform the public how a person can will their body to medical science.

Conflict of Interest

According to state law, appointed state officers are subject to specified standards of conduct (Article 6252-9b, V.A.C.S.). This includes, in certain circumstances, the filing of financial disclosure statements with the Office of the Secretary of State. A review of the documents filed with the secretary of state indicated that the secretary-treasurer had filed the appropriate financial statements. In addition, the secretary-treasurer has established adequate means for assuring that board members are aware of their responsibilities under conflict of interest statutes.

OTHER POLICY CONSIDERATIONS

During the review of an agency under sunset, various issues were identified that involve significant changes in state policy relating to current methods of regulation or service delivery. Most of these issues have been the subject of continuing debate with no clear resolution on either side.

Arguments for and against these issues, as presented by various parties contacted during the review, are briefly summarized. For the purposes of the sunset report, these issues are identified so they can be addressed as a part of the sunset review if the Sunset Commission chooses to do so.

OTHER POLICY CONSIDERATIONS

This section covers that part of the evaluation which identifies the major policy issue surrounding the board. For the purpose of this report, a major policy issue is given the working definition of being an issue, the resolution of which, could involve substantial change in current state policy. Further, a major policy issue is one which has had strong arguments developed, both pro and con, concerning the proposed change. The material in this section structures the major question of state policy raised by the issue and identifies the major elements of the arguments for and against the proposal.

Should the Anatomical Board be exempt from the State Funds Reform Act of 1981.

The State Funds Reform Act of 1981 (Article 4393c, V.T.C.S.) requires that all fees collected or received by a state agency shall be deposited in the state treasury and subject to appropriation only for authorized purposes, unless specifically exempted. While the Anatomical Board is not specifically exempted from this Act, they have never deposited any funds in the state treasury, and have never received an appropriation from the state for their financial support. Rather, the board's funds are held in local accounts under the management of the secretary-treasurer of the board.

Opponents to the board being exempt from the State Funds Reform Act argue that all agencies should be required to deposit their funds in the treasury to ensure legislative control over all state funds and expenditures. It is felt that funds held outside the state treasury cannot be adequately accounted for by the legislature. State government is set up to function through the process of having all funds collected or received deposited into the state's general revenue account, and redistributed through the appropriations process, only for purposes specifically authorized by statute.

Proponents of exempting the Anatomical Board from the State Funds Reform Act argue that the board has operated efficiently on a very small budget, with no paid staff, and at no expense to the state. Their annual budget in 1983 was \$2,570, funded through their assessment fees and interest on reserve funds. If the board's funds were required to be deposited in the state treasury, purchases would have to be made through the state purchasing commission, a budget request would have to

be written and submitted each biennium to the Legislative Budget Board and the Governor's Budget Office, and trips to Austin would be required for the board to participate in and follow the appropriations process. The secretary-treasurer of the board is already required to spend a considerable amount of time in maintaining the records of the board. The board has indicated that the additional tasks and paperwork involved in going through the appropriations process would probably necessitate the board hiring a staff person to assist the secretary-treasurer. It is argued that not exempting the board from this process would increase the time and effort required to operate the board, and result in increased costs to the state to operate a program which is currently self-sufficient. Further, it is pointed out that accountability and control of the board's limited funds will be ensured by the state auditor's implementation of annual audits.

ACROSS-THE-BOARD RECOMMENDATIONS

From its inception, the Sunset Commission identified common agency problems. These problems have been addressed through standard statutory provisions incorporated into the legislation developed for agencies undergoing sunset review. Since these provisions are routinely applied to all agencies under review, the specific language is not repeated throughout the reports. The application to particular agencies are denoted in abbreviated chart form.

THE ANATOMICAL BOARD OF THE STATE OF TEXAS

Applied	Modified	Not Applied	Across-the-Board Recommendations
			A. GENERAL
		X	1. Require public membership on boards and commissions.
		X	2. Require specific provisions relating to conflicts of interest.
X			3. Provide that a person registered as a lobbyist under Article 6252-9c, V.A.C.S., may not act as general counsel to the board or serve as a member of the board.
X			4. Require that appointment to the board shall be made without regard to race, color, handicap, sex, religion, age, or national origin of the appointee.
	X		5. Specify grounds for removal of a board member.
X			6. Require the board to make annual written reports to the governor, the auditor, and the legislature accounting for all receipts and disbursements made under its statute.
		X	7. Require the board to establish skill-oriented career ladders.
		X	8. Require a system of merit pay based on documented employee performance.
X			9. Provide that the state auditor shall audit the financial transactions of the board at least once during each biennium.
X			10. Provide for notification and information to the public concerning board activities.
		**	11. Place agency funds in the Treasury to ensure legislative review of agency expenditures through the appropriation process.
X			12. Require files to be maintained on complaints.
X			13. Require that all parties to formal complaints be periodically informed in writing as to the status of the complaint.
X			14. (a) Authorize agencies to set fees. (b) Authorize agencies to set fees up to a certain limit.
		X	15. Require development of an E.E.O. policy.
X			16. Require the agency to provide information on standards of conduct to board members and employees.
X			17. Provide for public testimony at agency meetings.
		X	18. Require that the policy body of an agency develop and implement policies which clearly separate board and staff functions.

**Other Policy Consideration.

The Anatomical Board of the State of Texas
(Continued)

Applied	Modified	Not Applied	Across-the-Board Recommendations
			B. LICENSING
		X	1. Require standard time frames for licensees who are delinquent in renewal of licenses.
		X	2. Provide for notice to a person taking an examination of the results of the exam within a reasonable time of the testing date.
		X	3. Provide an analysis, on request, to individuals failing the examination.
		X	4. Require licensing disqualifications to be: 1) easily determined, and 2) currently existing conditions.
		X	5. (a) Provide for licensing by endorsement rather than reciprocity.
		X	(b) Provide for licensing by reciprocity rather than endorsement.
		X	6. Authorize the staggered renewal of licenses.
		X	7. Authorize agencies to use a full range of penalties.
	X		8. Specify board hearing requirements.
		X	9. Revise restrictive rules or statutes to allow advertising and competitive bidding practices which are not deceptive or misleading.
		X	10. Authorize the board to adopt a system of voluntary continuing education.