

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 27, 2014 1:32:27 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 27, 2014 11:21 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 11:20

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Mike

Last Name: Bishop

Title: Professor of Marriage & Family Therapy; Past President TAMFT; Chair, AAMFT Ethics Committee

Organization you are affiliated with: Capella University & Texas Association for Marriage & Family Therapy

City: Paris

State: Texas

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

I am in opposition to moving the Texas State Board of Examiners for Marriage and Family Therapists and oppose any attempt to make this an advisory only board as proposed in section 3.2 of the Sunset staff report. Marriage and Family Therapists treat the most difficult psychiatric, relational, and family issues of Texas citizens. This group needs to be regulated, and not advised by, knowledgeable board members in the specific field of Systemic Marriage and Family Therapy and not just administrative personnel. In order to ensure the highest level of public protection, it is imperative that individuals with educational expertise oversee the professional licensure process of Marriage & Family Therapists, particularly in light of continuing advancements in health care. I support maintaining an independent board with professional marriage and family therapists and qualified public members that have an understanding of the profession and the issues that face mental health regulatory boards e.g., tele-health, continuing competency, the assessment and discipline of practitioners, the proper supervision and treatment of those disciplined practitioners for whom it is appropriate, the determination and assessment of appropriate education and qualifications for those entering the profession.

There is no data to support that reducing the structure of the Texas State Board of Examiners of Marriage and Family Therapists to an advisory committee will improve services, protect the public, or increase efficiency in the operation of DSHS or the Board. No operational deficiencies within the Texas State Board of Examiners of Marriage and Family Therapists have been identified to support this recommendation. Protecting the public by appropriately regulating our mental health professionals demands oversight by those trained in their respective professions.

It was interesting that the recommendation did not include psychologists.

With current research providing more evidence of the close integration of physical and mental health in human systems, it would make sense for medical and mental health to be closely aligned in the Texas regulatory structure.

I appreciate the Chair's decision to appoint a special subcommittee to more thoroughly investigate this issue.

Any Alternative or New Recommendations on This Agency: One exception to the greatness of Texas is our attention to the mental health needs of its citizens. We are consistently at the bottom of most mental health care categories of the fifty states. Perhaps this administrative debate is an opportunity for the legislature to begin creating a modern comprehensive mental health policy and plan. We are saving some money on the front end of mental health issues only to pay triple or more in the long term for the results of not addressing mental health issues early.

My Comment Will Be Made Public: I agree