

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 11, 2014 8:03:11 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 10, 2014 7:08 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 10, 2014 - 19:08

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jaime

Last Name: Goff

Title: Associate Professor and Chair, Department of Marriage & Family Therapy

Organization you are affiliated with: Abilene Christian University

City: Abilene

State: Texas

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

I am in opposition to Recommendation 3.2 to transfer the Texas State Board of Examiners to the Texas Department of Licensing and Regulation and to reconstitute this Board as an advisory committee. Reasons for my opposition include the following:

(1) Recommendation 3.2 places the public at risk. The regulatory oversight provided by the Texas State Board of Examiners of Marriage and Family Therapists which includes licensed marriage and family therapists as well as public members ensures that all LMFTs are well trained and adhere to high professional standards. The impact of LMFTs on the health and safety of the clients they serve mandates the oversight of an independent regulatory board that includes experienced licensed professionals.

(2) Unlike the other professions recommended for transfer to the Texas Department of Licensing and Regulation in Recommendation 3.2, Licensed Marriage and Family Therapists, Professional Counselors, and Social Workers must hold advanced graduate degrees and are considered Health Professions under Texas law. None of the occupations currently licensed by TDLR are required to hold even a bachelor's degree.

Any Alternative or New Recommendations on This Agency: Maintain the Texas State Licensing Board of Marriage and Family Therapists as an independent licensing board.

My Comment Will Be Made Public: I agree