

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 18, 2014 1:21:39 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 18, 2014 9:18 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 09:18

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: William

Last Name: Kneip

Title: Deputy Executive Director

Organization you are affiliated with: Central Counties Services (MHMR)

City: Temple

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I am writing in opposition to the Recommendation 3.2 to reconstitute the Texas Board of Examiners of Marriage and Family Therapists to an advisory committee of the Texas Dept. of Licensing and Regulation. The TBEMFT has long served the state and citizens of Texas well in rule-making, regulatory oversight, development and publication of ethical standards of practice, and enforcement actions. I believe that any "watering down" of the authority or specific mission of the TBEMFT, as well as the boards overseeing Professional Counselors and Social Workers, will be a step backward for the state of Texas and could well put it citizens at risk who expect highly competent, trained, and re-credentialed professionals to provide them services. The oversight of an independent regulatory board that includes graduate-trained (unlike the TDLR), experienced and licensed professionals is extremely important. These three licensed disciplines are considered Licensed Practitioners of the Healing Arts (LPHAs) and as such are qualified Medicaid providers. I am additionally concerned that passage of Recommendation 3.2 could put this LPHA status in jeopardy and thus negatively affect the billing of Medicaid for certain services in Texas. Thank you for your careful consideration of this comment.

Any Alternative or New Recommendations on This Agency: No alternative or new recommendations at this time.

My Comment Will Be Made Public: I agree