

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 4:43:14 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 27, 2014 3:44 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 15:43

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: William

Last Name: McGuire

Title: Dr.

Organization you are affiliated with: self-employed

City: Burleson

State: Texas

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

I oppose moving LMFT's from DSHS. I favor keeping the LMFT license with DSHS because LMFTs are health care providers. From a governmental perspective, because the education, issues, complications, implications, scope, and consequences of mental health work is radically different from occupational licenses, the protection of the citizens of Texas require that LMFTs remain with the DSHS. In addition, from my perspective as a citizen, I do not want my license to be taxed to pay for a move that I oppose on principle.

My credentials? I have a PhD in MFT and a couple of master's degrees. I am a Licensed Marriage & Family Therapist and have supervised MFTs. For many years, my primary employment was training graduate and doctoral students in counseling, MFT, and psychology. For years, I guided graduates in being licensed in Texas and in states scattered across the USA. I have recently taught some online MA courses in which students report on licensing laws all over the nation. LMFTs are consistently located with the state agencies that govern mental health services. There is wisdom in this.

Why keep LMFTs with DSHS? MFTs are trained in the delivery of mental health services. MFTs are defined as health providers by the federal government and the Texas Medical Liabilities Act. Grouping MFTs, who are professionals, with occupations is a categorical error and one with potential practical implications for the delivery of mental health serviced in the State of Texas. The responsibility for the protection of the mental health of the citizens of Texas who seek professional help require that LMFTs remain with the DSHS.

Thus, I urge you to keep LMFTs with the Texas Department of State Health Services who have a history of managing health service licenses.

Cordially,

William M. McGuire PhD

Any Alternative or New Recommendations on This Agency:

I favor keeping the LMFT license with DSHS because LMFTS are health care providers. From a governmental perspective, because the education, issues, complications, implications, scope, and consequences of mental health work is radically different from occupational licenses, the protection of the citizens of Texas require that LMFTs remain with the DSHS. In addition, from my perspective as a citizen, I do not want my license to be taxed to pay for a move that I oppose on principle.

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William M. McGuire PhD

My Comment Will Be Made Public: I agree