

My name is Marvarene Oliver. I am a Licensed Marriage and Family Therapist and a Licensed Professional Counselor, and am speaking on behalf of the Texas Association for Marriage and Family Therapy. I am a past-president of the Texas Association for Marriage and Family Therapy and a past member and chair of the Texas State Board of Examiners of Marriage and Family Therapists. I note these past responsibilities because I have the fairly unique experience of working as an advocate for MFTs and the profession of MFT during my tenure as President of TAMFT but also of working to protect the public in my tenure on the regulatory board.

My comments today concern Issue 3, including the Sunset staff's assessment that the TSBEMFT other mental health regulatory boards are not part of DSHS core mission and that the TSBEMFT should be reconstituted to become an advisory committee within the Texas Department of Licensing and Regulation. Marriage and Family Therapists are mental health care providers and are recognized as such by the federal government, state and federal agencies, in-patient treatment facilities, and third-party payors. We are trained to diagnose and treat mental disorders, and marriage and family therapists are specifically trained to work with systems in which people live, including families and larger systems.

Particularly given the nature of the services provided by Texas Marriage and Family Therapists, the regulatory board serves a critical function in protecting Texas citizens. It not only issues licenses—it regulates the profession. That means that it sets academic standards as well as experience and supervision requirements required to become licensed. It outlines the scope of practice for marriage and family therapists. It sets standards for continuing education requirements, including qualification of providers of continuing education and the content of continuing education that may be counted towards continued licensure. It hears and makes decisions about ethical issues and dilemmas. By statute, it reviews the Rules governing the licensees on a regular basis and makes changes to ensure that out-of-date, outmoded, or unneeded rules do not stay in place and to be sure that the rules keep place with technology and other advances that impact practice.

In order to fulfill its responsibilities, it is critical that the TSBEMFT remain an independent board composed of professional members as well as public members. Professional members are aware of current thinking in the field,

knowledgeable about advances and best practices, and able to address standards of care in a way that those who are not MFTs do not have the expertise to address. Professional members from the academic community are aware of the impact that changing academic requirements have on university programs and with what it takes to make program and course changes within university systems – they know first-hand that changes in academic requirements by a board, even when given a “start date” of two or three years out, must be addressed immediately in universities in order to have new courses and degree plans approved in time for students completing their programs to be eligible for license. Professional members in full-time practice, whether in agencies or independent practice, are knowledgeable about continuing education needs that will help them better serve their clients. All of these things are important to the public welfare because they impact the quality of services received by clients.

Since I currently serve as President-Elect of the American Association of Marriage and Family Therapy, I also am privileged to be aware of the impact that a move such as that recommended by Sunset staff may have on the availability of providers in Texas. Moving the board to an advisory one with staff holding ultimate responsibility for development of rules and regulations may result in regulations that are not in line with MFT requirements in other states, thus making it difficult for those who want to move to Texas or from Texas to practice in another state. Licensure portability is already difficult; a move such as the one recommended has the potential for making it more so.

Closely related and perhaps more important, the demotion of the MFT board’s authority could lead to the long-term perception in other states that the MFT license is weaker in Texas. The national association receives calls about the relative strength of the profession and license in various states, and some callers report that they have moved or not moved into a state based on the real or perceived strength of the profession. The independence of the board has an impact on the perception of the profession.