



TEXAS DEPARTMENT OF LICENSING & REGULATION

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November 22, 2022

Jennifer Jones, Executive Director
Sunset Advisory Commission
P.O. Box 13066
Austin, TX 78711-3066,

Dear Director Jones,

I appreciate the opportunity to provide feedback to the Sunset Advisory Commission regarding the report on the Anatomical Board of the State of Texas (SAB). We have reviewed the findings and proposed options, including the proposed abolishment of SAB and transfer of its functions to TDLR. Although TDLR has demonstrated success in past transfers of occupational and regulatory programs, we have identified several aspects of the whole-body donation program at SAB that do not align with TDLR's mission and functions.

SAB's mission is to facilitate the distribution of human remains for teaching and research purposes, while protecting the sanctity of the donated bodies and interests of their families. This incredibly important mission would be highly atypical at TDLR, where our focus on professional and occupational licensing does not entail receiving, monitoring, or distributing anything comparable for medical or scientific purposes. Unlike other agencies proposed for the transfer of the SAB, TDLR does not currently have procedures or best practices for the implementation of such a program at this time. This will require substantial costs, staff, and time to fully implement the transfer effectively. In addition, as the Sunset report points out, it is not clear that such regulation is the appropriate solution.

Further, placing schools of medicine, osteopathy, dentistry, and chiropractic, and their associated chancellors, governing bodies, and institutions under the oversight of TDLR, and creating an advisory board comprised of other state overseers, would create unique tensions in administering this program that are not present today in any other program at TDLR.

TDLR's mission is to earn the trust of Texans every day by providing innovative regulatory solutions for our licensees and those they serve. We are proud to support more than 890,000 licensed people and businesses as they provide valuable services to the people of Texas. However, as our own Sunset review recently found, our ability to take on additional responsibilities without jeopardizing the quality of these services is not limitless.

As TDLR continues to implement Sunset Advisory Commission directives from the 87th Legislature, we remain committed to providing Texans with quality regulatory services. Please accept this feedback on the proposed recommendations affecting TDLR, and feel free to reach out to me to discuss this response.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Arismendez".

Mike Arismendez, Executive Director
Texas Department of Licensing and Regulation