

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 4:46:52 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 18, 2014 1:45 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 13:45

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Karen

Last Name: Chandler

Title: Mrs

Organization you are affiliated with: Texas Association for Clinical Laboratory Sciences

City: McAllen

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I oppose the recommendation on DSHS report page 47 that several currently licensed allied health professions should be deregulated by using the lack of licensure of medical laboratory professionals as justification. This statement implies that the performance and quality of Texas labs is acceptable. This is false. Texas is number 1 in the nation for CLIA sanctioned labs six years running. In 2012, seven Texas labs had their CLIA licenses revoked or suspended. This means that these labs had significant deficiencies that were not corrected for several years prior to the time they were finally shut down. This means that many patients may have had incorrect diagnosis or suffered unnecessary additional procedures or hospitalizations. This is a waste of money for everyone not counting the toll it takes on the patient. This presents a significant risk to the public. I teach in an clinical laboratory science program and several of my students have quit jobs in small for profit labs because of they mistakes that the owners refuse to correct. The owners prefer to higher the lowest qualified individuals in order to make a profit.

Any Alternative or New Recommendations on This Agency: The Department of State Health Services and all clinical laboratories in the state need licensed laboratory personnel performing laboratory tests that impact public health. Certification and education equate quality; however, certification is not mandatory in Texas. The Clinical Laboratory Improvement Act (CLIA) requires a high school education for personnel performing moderately complex laboratory tests such as microscopically analyzing a blood smear to determine if a patient has malignant cells and performing blood typing for life or death blood transfusions. Lab testing requires expertise that is NOT provided in high school. Texas has had the highest number of CLIA sanctioned labs in the country for the last 6 years. Clearly, the status quo is not working. I recommend licensure for clinical laboratory professionals that are performing lab testing in clinical and public health labs.

My Comment Will Be Made Public: I agree