

**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 4:39:01 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, June 18, 2014 2:51 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 - 14:50

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Christopher

Last Name: Cielak

Title: Medical Technologist (ASCP,BB); Quality Manager

Organization you are affiliated with: TACLS

City: San Antonio

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: 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 should be reassessed. This statement implies that the performance and quality of Texas labs is acceptable. 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. That means that these labs had significant deficiencies that were not corrected for 2-3 YEARS before ultimately being shut down. FOUR of these labs were pediatric clinics! This represents HIGH risk to public health and inadequate regulation. To suggest that other allied health professionals should follow the under-regulated standards set for laboratory professionals is NOT the appropriate recommendation. I oppose the recommendation that licensure is not needed for medical laboratory professionals performing lab tests that directly impacts public health.

Any Alternative or New Recommendations on This Agency: 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