

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 09, 2014 7:44:08 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Sunday, June 08, 2014 10:39 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Sunday, June 8, 2014 - 22:38

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Stephen

Last Name: Garcia

Title: Medical Laboratory Scientist

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

City: Austin

State: Texas

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

I agree with the statement below. As a laboratory professional that performs laboratory tests at a hospital it is very important that I know what I am doing. Health providers trust the results they see from the laboratory so if I don't do my job correctly it will directly effect the patient. Put yourself in a scenario where you (or someone you love) are in the hospital and becomes hurt due to a "lab error".

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: 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!  
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My Comment Will Be Made Public: I agree