

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 4:35:24 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 18, 2014 3:09 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 - 15:08

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Louann

Last Name: Lawrence

Title: Medical Laboratory Scientist

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

City: Fort Worth

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or

Opposed: On page 47 of the report DSHS recommends deregulation of several currently licensed health professions using the justification that medical laboratory professionals are not licensed. I definitely do not agree with this recommendation. Medical laboratory professionals need to be licensed to assure quality laboratory testing for the citizens of Texas. Texas has been number 1 in the nation for having medical laboratories sanctioned because of poor quality of results for the last 6 years. In 2012 seven laboratories 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. The citizens of Texas deserve better quality.

Physicians use results from laboratory tests to make diagnoses, prescribe treatment, and prevent health risks. It makes no sense to suggest that other professions should be deregulated. This could cause quality to suffer in other areas of health services as it has been in laboratory results. I oppose the recommendation that licensure is not needed for medical laboratory professionals performing lab tests that directly impact public health.

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 tests that impact public health. Certification and education equate to 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 past 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