

Members:

On behalf of the Memorial Hermann Health System, thank you for the opportunity to address concerns our system has related to the recommendations outlined in the May 2014 Sunset Commission Staff Report on the Texas Department of State Health Services, and the impacts these recommendations, if implemented, will have on patient safety and quality of care.

Our system opposes Sunset staff recommendations which would discontinue several important licensure programs, including those for Dietitians, Medical Physicists, Medical Radiologic Technologists, Perfusionists and Respiratory Care Practitioners.

Dietitians ensure proper nourishment and care for patients, including the elderly patient recovering from a stroke and learning how to eat again. Medical Physicists apply methods of physics to medicine and healthcare, and are heavily involved in the diagnosis and treatment of patients, including the mother who has been diagnosed with cancer and is learning her treatment options. Medical Radiologic Technologists administer radiation to patients, including the young high school athlete who has sustained a sports injury and is questioning if they'll ever play sports again. Perfusionists operate intricate heart-lung machines during open heart surgeries, including the new baby who required open-heart surgery just hours after being born. Respiratory Care Practitioners treat and manage patients who have difficulty breathing, including the father who has sustained a spinal cord injury and cannot breathe on his own.

Each of these highly specialized and regulated medical professions are vital to ensuring patients receive the highest quality and safest care possible. The licenses these professionals currently receive from the State of Texas are critical to ensuring that their training and education qualify them to practice and make medical decisions directly affecting patient lives. Moreover, healthcare providers are not adequately staffed to serve as a substitute for the state's licensure process. The additional administrative costs and liability assumed would present a substantial burden to even the largest, most clinically integrated health systems in our state.

Additionally, these Sunset staff recommendations appear to run counter to a recent regulatory requirement impacting upon the lives of patients of Texas healthcare providers. The State recently announced that all physicians who utilize *fluoroscopy*, an imaging technique utilizing X-ray technology, must obtain hands-on training from a licensed radiologist or licensed medical physicist, and must be issued a certificate evidencing completion of such training before being able to engage in direct patient care. For this specific medical procedure and for numerous others, medical physicists, medical radiologic technologists, perfusionists and respiratory care practitioners are performing these procedures much more frequently, begging the question "why must the licensed physicians performing such procedures be regulated, but not the technologists charged with certifying them."

As the largest, non-profit healthcare system in Southeast Texas, Memorial Hermann Health System provides the highest quality of care to hundreds of thousands of patients each year, and as the largest private sector employer in the greater Houston area, our system relies on the critical state licenses and certifications our array of healthcare professionals receive to ensure their ability to do no harm to our patients.

I appreciate your attention to our system's concerns regarding discontinuing of the licensure and certification requirements for these and other healthcare providers, which I believe will have significant, negative impact on public health, patient safety and quality of care. We remain available to provide additional comment and background to Sunset Commission members and staff on this important issue.