

**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 23, 2014 3:10:47 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 23, 2014 1:44 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 23, 2014 - 13:44

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Sandra

Last Name: Tijerina

Title: Mrs.

Organization you are affiliated with: TACLS

City: Edinburg

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: The recommendation on DSHS report on p. 47 to deregulate several currently licensed health professions by using the lack of licensure of medical laboratory professionals as justification should be reassessed. The statement implies that the performance and quality of laboratories in Texas is acceptable. In the past 6 years, Texas has been ranked #1 in the nation for CLIA sanctioned labs, which means these labs had serious deficiencies that were not corrected for 2-3 years before they were closed down. These deficiencies pose a HIGH risk to public health and serve to drive up health care costs. 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 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 test such as microscopically analyzing a blood smear to determine if a patient has malignant cells (leukemia) and performing blood typing for life and death blood transfusions. Laboratory 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. This 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