



January 13, 2016

Wayne Stuberg, PhD, PT (Chair)
State Board of Health Credentialing Review Committee
The Nebraska State Office Building
Lincoln, NE

Dear Dr. Stuberg:

As an administrator of a multi-specialty ambulatory surgery center in Omaha and a member of the Nebraska Association of Independent Ambulatory Centers (NAIAC), I am writing to express my opposition to the licensing of surgical technologists.

It is said that licensure restricts practice or places a restriction on the use of a title. It can further restrict entry into the career. Although the intent of licensure may be to protect the consumer, economists argue that it effectively raises the salary by placing limits on the supply of the occupation. Since it's often the profession itself that recommends licensure, many believe the primary intent is to adjust their salaries upward and secondarily keep the public safe. I'm afraid that is the effect it would have on us here in Nebraska. Because of the costs of licensure, the supply of surgical technologists eligible for hire would go down and generally what follows would be increased wages.

Licensure is considered justified when an activity needs to be regulated which could be a threat to the public or puts the public in danger. Since a scrub tech works under the direction of a licensed medical doctor (MD) or licensed nurse (RN) in the operating room, the potential for harm done by a scrub tech is negligible. On-site supervision by the RN is expected while the scrub tech is performing any job duty in the operating room. Although they are valuable resources in our surgical facility, our scrub techs do not function independently in the operating room.

As an employer in Nebraska, I do not want to see wages increase due to licensure for a job title that does not function independently. I feel that there are enough licensed medical professionals in our facility to protect the public from harm and keep our patients safe. In attempts to control the cost of healthcare in Nebraska we must look seriously at unnecessary costs like this and oppose licensing of scrub techs.

Sincerely,

Margaret Summerfelt
Administrator

**111 SOUTH 10TH STREET
OMAHA, NEBRASKA
68102**

**T: 402-345-1712
F: 402-345-1864**



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State Board of Health Credentialing Review Committee
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Lincoln, NE

Dear Dr. Stuberg:

We are surgical technologists at Advanced Surgery Center. The techs here have a variety of experiences and education. Some of us are certified and some are not but we are all under the supervision of the RN or MD in the operating room.

Licensure would not change our job description or give us any added responsibilities. It would give us more liability and increase our costs. Only one facility in Omaha recognizes certification and pays more because of it. Certification already comes with lots of extra costs from sitting for the initial exam followed by the renewal and continuing education expenses.

We are certainly not in favor of licensure for the surgical tech here in Nebraska and hope you take our thoughts into consideration when voting for this.

Sincerely,

A handwritten signature in black ink that reads "Rebecca Chevalier CST". The signature is written in a cursive style.

Rebecca Chevalier, CST

A handwritten signature in black ink that reads "Crystal Svacina ST". The signature is written in a cursive style.

Crystal Svacina, ST

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Dear Dr. Stuberg:

As a practicing physician, owner, and chief of anesthesiology for a multi-specialty ambulatory surgery center in Omaha, I am writing to express my opposition to the licensing of surgical technologists.

It is said that licensure restricts practice or places a restriction on the use of a title. It can further restrict entry into the career. Although the intent of licensure may be to protect the consumer, economists argue that it effectively raises the salary by placing limits on the supply of the occupation. Since it's often the profession itself that recommends licensure, many believe the primary intent is to adjust their salaries upward and secondarily keep the public safe. I'm afraid that is the effect it would have on us here in Nebraska. Because of the costs of licensure, the supply of surgical technologists eligible for hire would go down and generally what follows would be increased wages.

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Sincerely,

Peter N. Piperis, MD
Partner and Chief of Anesthesiology

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