

**Sent:** Monday, March 09, 2015 10:51 AM

**To:** Briel, Ron

**Subject:** Comments/ suggestions/ questions concerning Surgical Assistants & Surgical Technologists Credentialing Review Application

Per my statement at the SFA TRC meeting on 3/6, here are my comments/ suggestions/ questions concerning Surgical Assistants & Surgical Technologists Credentialing Review Application submitted by Sidney Regional Medical Center, Sidney NE dated February 23, 2015. Pages referenced hereafter refer to page numbers included on that document.

1. Pg 5: is there a reason why the Nebraska State Assembly of Surgical Technologists & Surgical Assistants was not among the sponsors of the proposal? (I realize there is not requirement that they do so)
2. Pg 10, 2<sup>nd</sup> paragraph under PART A: Recommend applicants cite source of ACS statement or provide us with a link so we can review the document.
3. Pg 11, Surgical Assistant Functions – 1<sup>st</sup> paragraph – would like a citation or link to ACS quotation. In 2<sup>nd</sup> paragraph, cite or link to ACS and ASA sources of information included on the Surgical Assistant Functions table.
4. Pg 13, Surgical Technologist Functions section, paragraph 2 – cite or link to AST information.
5. Pg 13: table: item 4. (12) and (13): how/where is “licensed independent practitioner” defined? Same comment on Pg 15, first unbolded paragraph under 8
6. Pg 16, paragraph 1: CAAHEP references should be supported by citation or a link. We really should have access to that information in more detail. To read the requirements that follow, it appears that SA programs require a PRIOR BS or higher degree; is this the case? “Students should also have successfully completed college level instruction in:” – is this prior to or during the SA curriculum? To what extent is pharmacology required?
7. Pg 17, 1<sup>st</sup> paragraph and table: cite or link needed to information. Questions about the table:
  - a. Does the “and” in the 5<sup>th</sup> bulleted item on the table refer to just bulleted items 5 and 6 or does it refer to bulleted items 3, 4, or 5 AND 6? Similar confusion on bulleted items 10-13 related to use of OR on bullet 10 with AND on the next 2.
8. Pg 17 discussion re. CE should be more specific about what CE is required: who certifies CE? Same comment in information contained in items 17 & 18 on Pg 19.
9. Pg 25: I assume that the quoted licensing fees include the \$1/year LAP fee? I believe that registration does not make STs eligible for the LAP, correct? If it does, is the \$1/year fee included?
10. Pg 26, item 4.: Might not licensure/registration decrease the availability of qualified SAs and/or STs, thus driving up salaries and the cost of procedures? Cost could be a public harm; please address this.
11. Pg 28: Cite source of definitions used. Expand Personal supervision to also define direct and indirect supervision.

Jeffrey N. Baldwin, PharmD, RP, FAPhA, FASHP  
Professor of Pharmacy Practice and Pediatrics (Courtesy)  
University of Nebraska Medical Center  
986045 Nebraska Medical Center  
Omaha NE 68198-6045  
402-559-6498  
[jbaldwin@unmc.edu](mailto:jbaldwin@unmc.edu)