



## Midwest Eye Care, PC

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Matthew Appenzeller, MD  
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13500 California Street  
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18111 Q Street  
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2012 Cornhusker Road  
Bellevue, NE 68123

December 30, 2015

Ron Briel, Program Manager  
Division of Public Health, Licensure Unit  
Nebraska Department of Health and Human Services  
Lincoln, NE 68509

Dear Mr. Briel:

I am writing in regards to the 407 committee that is meeting to discuss the licensure of surgical technicians. I oppose the applicants' request for mandatory certification and licensure.

I am an ophthalmologist specializing in retina surgery, and I have practiced in Nebraska for the past twenty-one years. During surgery, I rely heavily on surgical technicians to provide me with tools and supplies, position equipment prior to usage, and maintain sterile conditions. It's delicate work and a patient's long-term vision depends on how well I perform surgery and how well I direct the surgical technicians, nurses and anesthetists that are members of the surgical team.

I perform surgery at several hospitals and an outpatient surgery center. All of the facilities are licensed and accredited. During my career, a significant majority of my surgery cases have been staffed by surgical technologists who came into their roles through on-the-job (OJT) training.

It is my opinion that the 'OJT-trained' surgical technologists with whom I have worked are as good or better than those who have graduated from a surgical technology training program. If I were to undergo eye surgery and were able to pick the operating room team, those OJT surgical technologists would be my first choices. From my perspective, experience trumps certification, and completion of a formal education program with required accreditation is not an indicator of a successful surgical technologist.

I disagree with the applicants' position that mandatory certification and licensure of surgical technologists is necessary to save the public from unnecessary danger. I support legislation and licensure when it's necessary to protect the public, but not when its primary purpose is to boost the enrollments of surgical technology programs in Nebraska.

Sincerely,

Mark D. Emig, MD

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