

Received
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Matt Gelvin, Program Manager- Credentialing Review (407) Program
Research, Policy and Quality Improvement
Licensure Unit
Division of Public Health
Department of Health and Human Services
301 Centennial Mall- South
Lincoln, Nebraska 68509-4986

This document will serve as a Letter of Intent for submitting an application for Credentialing Review.

The Nebraska State Assembly of the Association of Surgical Technologists will serve as the applicant group in requesting this review to consider the eligibility of the Certified Surgical Technologist for licensure status in the State of Nebraska. Currently the Certified Surgical Technologist is considered "unlicensed personnel."

The purpose of the requested review:

1. To provide surgical patients reassurance that every member of the operating room team has minimum education and competency requirements through the establishment of a license for Certified Surgical Technologists, helping to remove the risk associated with untrained personnel being a part of the operating room team.
2. Consider licensure to allow compliance with State of Nebraska vs Howard Paul (1898) ruling so physicians can delegate to a licensed individual instead of the practice of the surgical technologist being delegated by the circulating nurse according to the Nurse Practice Act.

These outlined purposes align with the criterion that will be considered in the Evaluation of Proposals for Initial Credentialing of the Members of Unregulated Health Professionals Currently Allowed to Engage in Full Practice. These criterion include:

- Criterion One: Unregulated practice can clearly harm or endanger the health, safety, or welfare of the public.
- Criterion Two: Regulation of the health profession does not impose significant new economic hardship on the public, significantly diminish the supply of qualified practitioners, or otherwise create barriers to service that are not consistent with the public welfare and interest.
- Criterion Three: The public needs assurance from the State of initial and continuing professional ability.
- Criterion Four: The public cannot be protected by a more effective alternative.

We would anticipate that a completed application/proposal for Credential Review will be ready for submission fall of 2015.

The contact person for the Nebraska State Assembly of the Association of Surgical Technologists relative to this letter of intent is:

Casey Glassburner, CST, FAST
President
Nebraska State Assembly of the Association of Surgical Technologists
10011 N. 151st Street
Waverly, NE 68462
(402)580-0057
cglassburner@southeast.edu

We look forward to receiving confirmation to proceed with the proposal/application process for credential review.

Sincerely,

Casey Glassburner

A handwritten signature in black ink that reads "Casey Glassburner". The signature is written in a cursive style with a large initial 'C' and a long, sweeping underline.