



1000 Pole Creek Crossing ☞ Sidney, NE 69162

December 17, 2015

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

Dear Mr. Briel:

As CEO of Sidney Regional Medical Center in Sidney, NE, I am writing in opposition to licensure of surgical technologists and in support of a mandatory registry for this health care occupation.

The field of surgical technology, when conducted appropriately, does not include duties that require a scope of practice. Surgical technologists are not restricted under the law from completing the functions listed in the application. As long as a RN is delegating functions of nursing and a physician is *not* delegating functions specific to his or her scope of practice, a surgical technologist is functioning under the law. Without a list of duties specific to the occupation that cannot be performed without a statute, the field of surgical technology does not require a scope of practice and licensure.

A Registered Nurse (RN) can only delegate tasks specific to the role of nursing to unlicensed health care professionals. Currently, a circulating operating room RN supervises and delegates to the surgical technologist before, during and after surgery. The surgeon directs and supervises the surgical technologist during the operative procedure. Licensing surgical technologists would disrupt the integrity of the surgical process as the operating room RN could no longer delegate functions of nursing to the surgical technologist. Essentially, a surgical technologist's range of functions would be diminished to only those duties listed on the application. The circulating RN would no longer be able to fully manage the surgical suite through the entirety of a procedure effectively or efficiently which can endanger patient outcomes. Upsetting the fluid nature of an operative procedure and the many processes involved is detrimental to the way surgery has been performed successfully for decades.

There is no evidence that the current unregulated status of surgical technology has created a danger to the health, safety or welfare of the public. Hospitals each maintain internal policies and procedures for surgical technology that ensure technologists are functioning appropriately and performing within the standards of best practices. I could not find any reported occurrences of a surgical technologist's actions resulting in specific adverse patient outcomes—let alone multiple occurrences. If successful surgical practices have been carried out for decades without licensure of surgical technologists, and continue to be even after the moratorium on delegating tasks to a surgical technologist, surgery will continue to be performed safely and successfully in Nebraska without a significant or pervasive risk to surgical patients.

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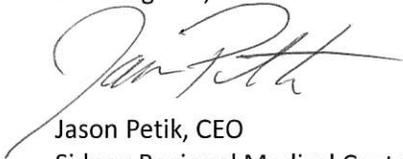
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Lastly, since surgical technologists do not require a scope of practice to perform their duties and since there is not a perceptible risk to patient safety as currently unregulated, it seems that the detriment to Nebraska's health care workforce is both needless and profound. Surgical technologists are essential to surgical suites across the state. Imposing both an educational and credentialing requirement on this occupation will greatly diminish the ability of hospitals and surgical centers to recruit for this position. Surgical technology coursework, examination and licensure would be difficult for many in this entry-level position to afford. This will lessen the availability of qualified technologists. Nebraska's health care workforce is already facing hurdles as we attempt to build well-qualified personnel. Licensure of surgical technologists would needlessly burden this effort.

While hospitals monitor personnel, I do support creation of a mandatory registry for surgical technologists that would allow employers to access an employable list of registered technologists. However, since surgical technologists do not have an apparent scope of practice, are best placed under the purview of nursing staff and do not pose a threat to public safety as unlicensed personnel, I do not support licensure of surgical technologists.

Thank you for the opportunity to provide feedback on this issue.

Best Regards,



Jason Petik, CEO  
Sidney Regional Medical Center

JP/lb

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