



To: Senate Public Health and Welfare Committee

From: Rachelle Colombo
Director of Government Affairs

Date: February 12, 2018

Re: SB 338 relating to the certification of surgical technologists

The Kansas Medical Society appreciates the opportunity to provide comments regarding our opposition to SB 338, establishing certification for surgical technologists.

KMS encourages policy that ensures access to high quality care delivered by a physician-led team for Kansas patients. We support an integrated, team-based approach to health care delivery that includes advanced practice providers and supervised technicians adequately educated and trained and consistently regulated for a comprehensive approach to health care delivery that protects patients. Unfortunately, SB 338 is not constructed in such a way to ensure uniform certification, standard of care or physician supervision.

Specifically, the bill fails to appropriately limit the scope of practice of a surgical technologist. All of the duties of a surgical technologist should be limited to the direct supervision of a surgeon. Even advanced practice providers such as physician assistants with more comprehensive training are limited in their practice act to those functions delegated by a physician. We do not support the establishment of a lesser standard for surgical technologists.

Additionally, the bill sets forth a variety of options for the establishment of certification, but removes these requirements if a health care facility cannot find a certified technologist to employ. This fundamentally undermines standard of care. Individuals who hold themselves out to the public as health care providers must be competent to perform such duties without exception.

In summary, SB 338 fails to establish a narrowly defined scope of practice consistent with the education and training of a surgical technologist, it does not ensure adequate physician supervision, the certification standards are not consistent and the regulation is delegated to the Board of Healing Arts without fees attached to support the additional workload to the Board. For these reasons, KMS is opposed to SB 338 and respectfully request the bill not be advanced. Thank you.