



Lake District Hospital
Lake Health Clinic
Lake Specialty Clinic
Home Health & Hospice
Behavioral Health & Prevention
Lake County Public Health

June 13, 2019

Dana Selover, MD, MPH
Oregon Health Authority
Health Care Regulation & Quality Improvement
800 NE Oregon Street, Suite 465
Portland, OR 97232

Dear Ms. Selover,

For the last four years, since the passage of HB 2876 requiring Surgical Technologists practicing in Oregon to be certified, Lake District Hospital has struggled to find individuals qualified to fill these roles. Currently, we have 2 positions on staff that are impacted.

We have inquired with Klamath Community College, the nearest school to Lakeview which is 90 miles away about starting a program for Surgical Technologists but were told that the cost is prohibitive for them to do so. For us to send our staff out of the area to Linn-Benton Community College in Albany which is 300 miles distance from Lakeview if would be cost prohibitive and would close our OR and the ability to deliver babies.

Recently, we learned that one of the barriers to finding or developing certified Surgical Technologists was the rule handed down by the Oregon Health Authority (OHA) recognizing only one type of nationally-accredited certification, which is a change from that which was originally stated.

While we support the requirement for practicing Surgical Technologists to be certified, we would advocate that OHA consider revising its current rule include recognition of both the Certified Surgical Technologist (CST) and Technologist in Surgery-Certified (TS-C) credentials. Our understanding is that the TS-C is recognized in 45 other states and, like the CST, is accredited by the National Commission for Certifying Agencies (NCCA).

By allowing the use of both credentials, individual healthcare organizations would be empowered to make their own decisions as to which option is best for themselves. We would advocate for on-line training for those employed surgical technologist that have been grand-fathered in.

Thank you for your consideration.

Sincerely,

Charles B. Tveit
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Lake Health District