



Chair Nosse, Vice-Chairs Goodwin and Nelson, and Members of the House Behavioral Health and Health Care Committee,

I write today on behalf of Concorde Career Colleges to express Concorde's significant concerns with HB 3596, which modifies the surgical technology apprenticeship pathway adopted as part of HB 4106 (2022). Although Concorde was neutral on HB 4106 (2022), we oppose HB 3596. HB 3596 goes far beyond addressing any drafting error or technical fix to the legislature's work last session, instead substantively changing the law by removing key requirements for the educational rigor of apprenticeship programs. We do not believe this concept is ready to move forward this session, and urge you to vote no on HB 3596.

Concorde Career College is an important component of Oregon's professional health care workforce pipeline. Our Portland campus offers seven different degree or diploma programs, including Dental Assistant, Medical Assistant, Medical Office Administration, Polysomnographic (sleep) Technology, Practical Nursing, Respiratory Therapy and Surgical Technology.

Our Concorde Portland campus is one of three accredited surgical technologist associate degree programs in Oregon, with the other two being at Linn Benton Community College and at Mt. Hood Community College. Our accreditation authorizes us to serve a capacity of up to three cohorts per year with a maximum of 24 students per cohort. However, in order to serve our students effectively, we must limit our cohort sizing to align with clinical site availability. For the last two years, we have therefore educated a total of 22 graduates in 2021 and 25 graduates in 2022. Our program is designed to prepare graduates with the basic knowledge and fundamental practical and professional skills needed for employment as an entry level generalist, combining academic studies, hands-on lab instruction, and clinical training in various surgical settings.

Our placement and licensure rates for surgical technology graduates well exceed benchmarks for our national accreditor, with 100% of our students in 2021 being placed and licensed. Our 2022 graduates had an 89% employment rate. Our graduates serve patients throughout the state, with many of our clinical sites located outside the Portland metro area and over half of our graduates in 2021 ultimately taking jobs outside the Portland metro area and in locations across the region.

Concorde has engaged in discussions on surgical technology apprenticeships since the policy concept was first introduced in 2020. Since that time, our very strong message has consistently been that any apprenticeship pathway must result in all surgical technologists in our state having equivalent education. Education not only protect patients, but also protects trainees from injury and disease. Exposure to injuries such as laser injury or infectious disease like HIV or hepatitis C is a real day-to-day risk for operating room personnel, and apprentices deserve to be prepared to enter the operating room armed with essential classroom knowledge to protect themselves.

Since 2020, every introduced version of this policy, including the introduced version of HB 4106,¹ explicitly provided that any apprenticeship program must include "an educational program for surgical technologists accredited by a national accreditation organization."

¹ See Introduced [HB 4089](#) (2020); Introduced [HB 2464](#) (2021); Introduced [HB 4106](#) (2022).



While that language was always part of the bill, we worked prior to the 2022 session to offer the adopted [-1 amendments](#), which clarified that, given how that organization functions, the NCCT requirement now in law refers to the credential *earned by a student after testing* and that sets requirements for a student to meet in order to sit for an exam, but is not a credential for the educational program. With those amendments, Concorde took a neutral stance on HB 4106.

In other words, Concorde remained neutral on HB 4106 premised on the express understanding that the statutory language required apprenticeships to include educational programs that are held to the same high standards as existing programs.

As drafted, HB 3596 bill not only removes the requirement that each apprenticeship program include a nationally accredited education program, but it writes out of statute all express requirements that an apprentice receive classroom education prior to undergoing experiential training in the Operating Room. If passed, this bill could open the door for approval of apprenticeship programs that do not require apprentices to establish foundational knowledge through classroom education before entering the OR.

HB 3596 is counter to what Concorde agreed to when we were neutral on HB 4106, and we believe it is counter to legislators' understanding of how the apprenticeship program would work. For example, please see:

- [HB 4106 public hearing on February 7](#), comments by Chief Sponsor Representative Moore-Green, a Chief Sponsor, stating HB 4106 would require the same or higher educational standards as the existing pathway.
- [HB 4106 work session on February 9](#), comments by Representatives Evans and Holvey, where Representative Holvey specifically cited his understanding that the bill requires education in both pathways that line up as a reason he was comfortable with the bill.
- [This slide deck, page 7](#), stating that the educational elements for apprenticeships will be "provided through approved, certified and experienced partners, i.e. certified community college and/or certified existing trade school programs," and that "standards will be even higher than existing programs."

In summary, HB 3596 removes from statute a requirement that was explicitly relied on by stakeholders and legislators to make policy decisions regarding surgical technology apprenticeship programs, and could put patients and apprentices at risk. This is a significant, substantive change and Concorde strongly believes that this bill is not ready to move forward this session. We urge you to vote no on HB 3596.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen McGee".

Maureen McGee
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