



March 8, 2021

Colorado Senate Committee on Health & Human Services
200 E. Colfax Ave
Denver, CO 80203

RE: SB21-092

Dear Chairwoman Fields, Vice Chair Pettersen and Members of the Committee:

The Association of Surgical Technologists (AST) appreciates the opportunity to comment regarding the sunset review of the Surgical Assistant and Surgical Technologist Registration, SB21-092. AST supports the continued registration of surgical assistants and surgical technologists. AST would have preferred to require certification for surgical technologists, which would have had Colorado joining nine other states that have adopted certification requirements for surgical technologists. Also, we would ask for additional clarification around the grounds for disciplinary proceedings.

AST is a national, non-profit organization that represents the interests of over 70,000 surgical technologists who hold the Certified Surgical Technologist® (CST) credential. Today, surgical technologists are working in one of the fastest growing professions in the country. The US Bureau of Labor Statistics projects that the surgical technology profession to grow 9% from 2018-2028, which is faster than the average of all other occupations, and it is anticipated that the volume of surgery will increase exponentially due to the expanding senior population.¹ There are 109,000² surgical technologists employed nationwide including 1,720³ in Colorado.

As the oldest and most widely recognized professional organization for surgical technologists, AST's primary purpose is to ensure that surgical technologists have the knowledge and skills to administer patient care of the highest quality.

Surgical Technologists & Surgical Assistants Role in Operating Rooms

Surgical technologists are allied health professionals who work under the direct supervision of a surgeon. They serve as the surgeon's co-pilot, and among their many functions, they provide instruments and supplies to the surgeon during a surgery and must constantly anticipate the surgeon's needs and think many steps ahead, because every minute a patient is in surgery

¹ <https://www.bls.gov/ooh/healthcare/surgical-technologists.htm>

² <https://www.bls.gov/oes/current/oes292055.htm>

³ https://www.bls.gov/oes/current/oes_co.htm

increases the risks related to anesthesia and bleeding. The surgical technologist also operates complex surgical equipment, such as robots; they handle specimens, such as kidney stones and biopsy tissue; and, most importantly, they execute very precise actions – known as “sterile technique” – in order to keep the immediate surgical area sterile.

A truly competent surgical technologist must have a working knowledge of human anatomy, surgical procedures, and numerous instrumentation and technologies in order to assist the surgeon’s performance of invasive procedures. Despite their critical role during surgeries, surgical technologists are the **only** member of a surgical team who is **not** required to meet any minimum threshold competency requirements. In the interest of patient safety, AST believes the surgical technology profession demands standards.

Surgical assistants are advanced allied health practitioners who provide aid in exposure, hemostasis, wound closure, and other intraoperative technical functions that help the surgeon carry out a safe operation with optimal results for the surgical patient. The surgical assistant performs these functions under the direction and supervision of the surgeon and in accordance with hospital policy and appropriate laws and regulations.

Clarification on Section 4 Grounds for Disciplinary Proceedings

In the legislation under Section 4 Grounds for Disciplinary Proceedings subsection (III)(k) it states the following: *“failed to respond in a materially responsive and timely manner to a compliant against the registrant.”* (page 6, lines 7-10).

What does materially responsive mean? Also, what would constitute a “timely manner” to respond? Our members need adequate time to respond to complaints; therefore, AST suggests that “timely manner” be replaced with “within 30 days.”

AST appreciates the opportunity to comment regarding SB21-092, and urges your passage of SB-092. If you have any questions regarding this letter, please contact Josephine M. Colacci, Esq. with any questions at 303-325-2540 or josephine.colacci@ast.org.

Sincerely,

Bill Teutsch, CAE, FASAHP
CEO/Executive Director
AST

⁵ <https://www.ncbi.nlm.nih.gov/pubmed/20885144>

⁶ <https://www.ncbi.nlm.nih.gov/pubmed/25443121>