



**TESTIMONY OF
CONNECTICUT HOSPITAL ASSOCIATION
SUBMITTED TO THE
GENERAL LAW COMMITTEE
Tuesday, March 11, 2014**

**SB 300, An Act Concerning Persons Who Decontaminate Reusable
Medical Instruments Or Devices**

The Connecticut Hospital Association (CHA) appreciates this opportunity to submit testimony concerning **SB 300, An Act Concerning Persons Who Decontaminate Reusable Medical Instruments Or Devices**. CHA supports the goal of providing safe, quality care to all patients, but has concerns with the bill as currently drafted.

Connecticut hospitals are committed to initiatives that improve access to safe, equitable, high-quality care. They are ensuring that safety is reinforced as the most important focus—the foundation on which all hospital work is done. Connecticut hospitals launched the first statewide initiative in the country to become high reliability organizations, creating cultures with a relentless focus on safety and a goal to eliminate all preventable harm. This program is saving lives.

SB 300 seeks to create a new category of credentialed healthcare workers—specifically “central service technicians.” Under the bill, these technicians would be the only individuals, other than licensed healthcare providers working within their scope of practice (or students under their supervision), who could legally decontaminate, prepare, package, sterilize, store, or distribute reusable medical instruments or devices in hospitals or surgical centers. CHA opposes the bill as written because it includes too broad a scope of activities and narrows the professionals who can perform these activities. CHA understands that the proponents of the bill will be submitting revised language to the Committee, and we look forward to reviewing the revised language.

As drafted, the bill would have unintended consequences that could negatively affect patient care, create unnecessary delays, and apply administrative burdens. For example, because the bill would make it illegal for any non-licensed person other than a certified central service technician to store or distribute reusable medical devices, a registered pharmacy technician, with or without pharmacist supervision, could no longer take a glucose monitor off the shelf to prepare it for patient use. A patient care assistant could not wheel a cart carrying sterilized and packaged device cartridges into the operating room. These are all safe and common practices where “reusable medical devices” (as the FDA defines that term) are used. This section applies in a healthcare facility to decontamination, preparation, packaging,

sterilization, storage, and distribution of medical instruments and devices in anticipation of being reused, but is not applicable to their initial use.

While we applaud the goal of moving toward a specific structured role for central service technicians, it is not safe or appropriate to make a wholesale leap to assuming that course is correct without the necessary specificity of what a technician does and what others are permitted to do, and without accounting for the full scope of what is included in the description of reusable devices or instruments.

Even if it was tailored to avoid being overly broad, the bill as drafted is flawed in that it does not permit “on-the-job training,” which is one of the primary routes to certification. It also contains a very limited grandfather provision that would give current hospital employees, some of whom have worked at this job in excess of twenty years, only eighteen months to become certified—or be out of a job. In addition, the language regarding continuing education units (CEUs) may not be necessary, as completion of CEUs is required for maintaining certification from the two mentioned certifying bodies.

CHA urges the Committee to encourage the proponents to submit this proposal through the Department of Public Health’s Scope of Practice review process, where each of these important issues can be fully researched and vetted by all interested parties. Should the Committee wish to move the bill forward, we respectfully request that we be able to work with the Committee and interested parties as part of the process of refining the language of SB 300.

Thank you for your consideration of our position. For additional information, contact CHA Government Relations at (203) 294-7310.