

International Joint Commission on Allied Health Personnel in Ophthalmology  
Testimony on HB 1006  
House Health & Government Operations Committee Hearing, March 6, 2024

I am Linda M. Tsai, MD, FACS, an Ophthalmologist and also the Secretary of Public Affairs for the International Joint Commission on Allied Health Personnel in Ophthalmology (IJCAHPO). It is in that capacity that I am providing this testimony to you.

While we applaud and endorse the goal of improving patient safety and surgical outcomes, the language in HB 1006 may have an unintended consequence that could actually place patients undergoing ocular surgery at a greater risk than necessary by excluding some certified individuals who have demonstrated greater skills and training in ocular surgery. Ophthalmic surgical assistants have become indispensable members of the surgical team and have helped to make ocular surgical procedures some of the safest and most successful surgeries in all of medicine.

We request that the term “Surgical Assisting” be inserted following “Surgical Technologist” throughout the legislation as they are identical roles to that which is defined and addressed by this legislation.

Our specific areas of concern are found on page 3, between lines 26-30. As required in the legislation, once the words “Surgical Assisting” are included, those who hold the IJCAHPO Ophthalmic Surgical Assisting (OSA) certification do hold:

“A CERTIFIED SURGICAL TECHNOLOGIST OR SURGICAL ASSISTING CREDENTIAL ADMINISTERED BY A NATIONALLY RECOGNIZED SURGICAL TECHNOLOGIST CERTIFYING BODY ACCREDITED BY THE NATIONAL COMMISSION FOR CERTIFYING AGENCIES”

However, the language that follows becomes more prescriptive by requiring additional hurdles:

“**AND** RECOGNIZED BY THE AMERICAN COLLEGE OF SURGEONS **AND** THE ASSOCIATION OF SURGICAL TECHNOLOGIST”

We request the removal of this language as the requirements of a national certification and accreditation by the National Commission for Certifying Agencies is sufficient to achieve your goals. Should you wish to keep this language, we request that the second “AND” be removed, as seen below in the strike through, and “OR” be added along with the additional language in bold below. The paragraph would then read:

“A CERTIFIED SURGICAL TECHNOLOGIST OR **SURGICAL ASSISTING CREDENTIAL** ADMINISTERED BY A NATIONALLY RECOGNIZED SURGICAL TECHNOLOGIST OR

**SURGICAL ASSISTING CERTIFYING BODY ACCREDITED BY THE NATIONAL COMMISSION FOR CERTIFYING AGENCIES AND RECOGNIZED BY THE AMERICAN COLLEGE OF SURGEONS, AND THE ASSOCIATION OF SURGICAL TECHNOLOGIST, OR BY A SUBSPECIALTY SURGICAL ASSISTING OR SURGICAL TECHNOLOGIST CERTIFYING ORGANIZATION TO INCLUDE BUT NOT LIMITED TO THE INTERNATIONAL JOINT COMMISSION ON ALLIED HEALTH PERSONNEL IN OPHTHALMOLOGY, THAT IS A NATIONALLY RECOGNIZED AND ACCREDITED BY THE NATIONAL COMMISSION FOR CERTIFYING AGENCIES OR OTHER NATIONALLY RECOGNIZED ACCREDITING BODY”**

Our goal is not to exclude certified surgical technologists who have acquired the necessary skills and proficiencies to assist ocular surgeons through other certifying bodies, but rather to ensure that IJCAHPO certified OSA, and other subspecialties, who already possess the skill and certification needed, are recognized in all legislative and regulatory actions regarding surgical technologist or surgical assisting. This is in the best interest of efficient, high-quality care, and public protection.

The practice of modern medicine is extraordinarily specialized and demanding, and nowhere is this truer than in the practice of Ophthalmology. IJCAHPO was established in 1969 as a 501(c)3 not-for-profit organization dedicated to educating and certifying ophthalmic medical assistants to meet the needs of ophthalmologists and ensure that their patients receive the highest quality eye care. We have certifications, including the OSA, that have been awarded accreditation by the National Commission for Certifying Agencies (NCCA) after meeting or exceeding their rigorous standards.

Our shared goal is to provide patients with the highest level of care and the safest experience possible in the operating room. As an Ophthalmologist, I want only the best for my patients, and that means using only the most qualified and best trained surgical assistants possible in the operating room. I am sure you will agree that providing the highest quality healthcare by the most well-trained and skilled individuals, which is clearly demonstrated by those who are IJCAHPO certified OSA, is of the greatest importance to ensuring the best and safest outcomes for the citizens of Maryland.

I respectfully request that this legislation be amended to include individuals who hold a valid certification from IJCAHPO as OSA are eligible for employment as surgical assistants/surgical technologists in the state of Maryland.

Thank you for the opportunity to provide this testimony and your consideration of our request.

Best Regards,

*Linda M. Tsai, MD, FACS*

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