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JUL 11 2016

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July 11, 2016

TO: the President of the Senate and the Speaker of the House of Representatives,

A.R.S. § 32-3105 for health professionals
Phlebotomy as a Specialty

This sunrise application aims to allow phlebotomists who open a business providing mobile blood-drawing services, the authorization to bill insurance companies for already established covered services.

An estimated 70% of all decisions regarding a patient's diagnosis and treatment depend on an accurate blood draw. Hospital admissions and discharges also rely on blood test results.

The current options for patients to get these tests leave a lot of room for improvement. Laboratories and Patient Service Centers are overloaded burdening the patients they aim to help. Patients must sit and wait, while they or their caretakers must take time off work. Arranging a ride or relying on public transportation can further complicate getting a blood test.

Overworked phlebotomists are more likely to make

errors that cause inaccurate results, which can impact the patient's health, resulting in greater cost and inconvenience.

Patients who are not able to follow up with their blood draw requests, eventually end up in the emergency room with undiagnosed symptoms, again, possibly compromising their health and further increasing costs to patient and payor.

Mobile blood draws are a medically covered service. In 2010, The Center for Medicare & Medicaid Services approved Phlebotomists as service providers. C.L.I.A (Clinical Laboratory Improvement Amendment) later revoked their part of the certification. At this time, in order to bill CMS, (which includes a CLIA Number) a mobile phlebotomy service has to include its own testing laboratory. This is where the change is needed.

By making Phlebotomy a Specialty, properly documented, experienced phlebotomists are able to expand much needed outreach by accurately drawing and collecting specimens on a mobile basis and delivering the specimens to the appropriate insurance-preferred laboratory for timely, efficient testing. This outreach also promotes economic

development by providing a small-business opportunity to entrepreneurial phlebotomists.

When implemented, this proposal can save millions of dollars through reduction of duplicative testing and trips to emergency departments, while offering a more convenient and higher quality experience for patients in the comfort of their own home.

Thank you for your attention,

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