

October 9, 2019

*Via electronic submission to: [DSHS.EMS-TRAUMA@dshs.texas.gov](mailto:DSHS.EMS-TRAUMA@dshs.texas.gov)*

## **PUBLIC COMMENT LETTER**

Elizabeth Stevenson, RN  
Designation Program Manager – CEFDT, Maternal, Neonatal, Stroke, and Trauma  
Texas Department of State Health Services  
1100 West 49th Street  
Austin, Texas 78756-3199

Re: 2019 Proposed Trauma Resource Document

Dear Ms. Stevenson:

On behalf of our more than 470 member hospitals and health systems, including rural, urban, children's, teaching and specialty hospitals, the Texas Hospital Association is pleased to submit comments on the Texas Department of State Health Services' Proposed Requirements for Trauma Designation. THA appreciates the significant efforts made by TDSHS to incorporate feedback from stakeholders throughout the state. It is our understanding that TDSHS has not yet incorporated all the feedback it received from THA and other stakeholders and interested parties regarding the future of the trauma designation requirements. THA looks forward to reviewing the additional changes. Insofar as the feedback that has been incorporated to date, THA believes TDSHS's Proposed Requirements for Trauma Designation represent positive changes to the trauma designation process that balance patient protection and the realistic allocation of resources.

In general, the current Proposed Requirements for Trauma Designation offer valuable additional clarity surrounding the trauma designation process. THA also appreciates much of the staffing flexibility in the proposed requirements. For instance, THA appreciates TDSHS' allowing any member of the executive team to attend a pre-survey conference, rather than limiting participation to the chief executive officer. This proposed change affords important flexibility for facilities undergoing a survey, while ensuring an informed leadership team. In addition, TDSHS' departure from requiring a static number of year's continuous employment at the facility for physicians in exchange for general experience in caring for trauma patients will provide facilities with the flexibility to balance a changing workforce with patient care needs.

As mentioned above, in addition to the feedback provided by THA, THA understands that clinicians and other stakeholders have provided other comments to the Proposed Requirements for Trauma Designation and looks forward to evaluating those comments and any changes incorporated by TDSHS. Please do not hesitate to contact me directly with any questions or concerns.

Ms. Elizabeth Stevenson, RN

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Cameron Duncan III". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

D. Cameron Duncan III  
Associate General Counsel  
Texas Hospital Association