

Proposed SOC Changes

The Association for the Advancement of Medical Instrumentation (AAMI) appreciates the opportunity to submit these comments in response to Federal Register Notice OMB-2014-0005-0001, entitled Standard Occupational Classification (SOC)—Revision for 2018; Notice.

Background

AAMI is a diverse community of nearly 7,000 healthcare technology professionals united by one important mission—supporting the healthcare community in the development, management, and use of safe and effective healthcare technology. Many of AAMI’s members are clinical engineers, biomedical equipment technicians (BMETs), systems engineers, clinical systems engineers, and others who work in the field known as Healthcare Technology Management (HTM). These individuals work in both healthcare delivery and the medical device industry, and they are typically responsible for managing the life cycle of medical devices and related technology and focus especially on maintenance, repair, recalls, troubleshooting, and training of the users of the technology.

AAMI appreciates this opportunity to submit these comments, for three primary reasons: 1) there has been confusion and misunderstanding about the current classification for the field of healthcare technology management; 2) the field has expanded, grown, and changed its name, and the classifications should reflect the current state of the field; and 3) new job titles have taken hold to reflect the changing nature of explosive growth of technology used in healthcare.

Summary of and Rationale for Proposed New Detailed Occupations and Job Titles

On page 4 of this document, please find a chart outlining proposed changes to the Office of Management and Budget’s (OMB) Standard Occupational Classification (SOC) from AAMI. We propose that a new detailed occupation titled “**Healthcare Technology Management—Engineers**” be listed under the category “17—Architecture and Engineering Occupations.” Under this new detailed occupation, we recommend establishing the job titles of “Clinical Engineer” and “Clinical Systems Engineer.” Additional information about this proposed new detailed occupation follows below.

We also propose that the detailed occupation currently listed as “Medical Equipment Repairers” be renamed “**Healthcare Technology Management—Technicians**,” and moved to the category “17— Architecture and Engineering Occupations.”

The above changes would reflect the unifying name of “Healthcare Technology Management (HTM),” which represents the field responsible for managing the selection, maintenance, and safe and effective use of medical equipment and systems (the full life cycle of technology). HTM professionals—including clinical engineers, biomedical equipment technicians, radiology

equipment specialists, and other skilled professionals—use their expertise to ensure the safety, efficacy, and availability of life-saving healthcare technologies, while keeping healthcare costs down.

The name “Healthcare Technology Management” was established in 2011 at an event called the “Future Forum,” which was hosted by AAMI and attended by a wide variety of stakeholders in the healthcare technology field. The term “Healthcare Technology Management” has become widely accepted and is now commonly used by employers, associations, and professionals in the field. AAMI sponsors a “Healthcare Technology Management Week” celebration each spring, which is now celebrated by the entire field of engineers and technicians who are responsible for managing the life cycle of medical devices and related technology. AAMI also has developed and published the core competencies needed for anyone who wants to work in the field; these core competencies are used by educational programs, employers, students and professionals out in the field.

In addition to the changes outlined above, we also offer some suggested minor wording changes to existing job titles in the enclosed chart.

The Details: Proposal of New Detailed Occupation: Healthcare Technology Management—Engineers

We propose that “Healthcare Technology Management—Engineers” be listed as a detailed occupation under the category “17—Architecture and Engineering Occupations.” The chart on page 4 more visually shows the proposal.

Nature of the Work Performed:

- Providing technical support for healthcare technology in hospitals and other healthcare facilities
- Documenting all actions and test results using computerized maintenance management software applications and other standard office software applications
- Coordination and/or participation in the acquisition of new healthcare technology
- Purchase planning, development of bid specifications, analysis of vendor proposal
- Developing preventive maintenance schedules and guidelines, and other procedures to be followed when the department is performing maintenance on technology
- Participating in development of quality assurance programs or quality improvement initiatives related to the proper use/maintenance/repair of healthcare technology
- Performing incident investigations and equipment performance analysis
- Developing/reviewing emergency and safety plans related to use and operation of healthcare technology
- Reviewing healthcare technology safety alerts/recall notices and taking appropriate actions

- Developing evaluation criteria to compare healthcare technology under consideration for purchase
- Calibration, maintenance, and repair of healthcare technology
- Technical troubleshooting of malfunctioning healthcare technology

The Details: New Job Titles

We are proposing the addition of two new job titles to the Direct Match Title File: “**Clinical Engineer**” and “**Clinical Systems Engineer**.” These titles are unique to our proposed occupation of “Healthcare Technology Management—Engineers.”

These two job titles are currently NOT listed in the Direct Match Title File in use.

Primary Employers:

Hospitals, hospital systems, and other healthcare delivery organizations are the primary employers of this occupation. Some individuals also work for medical device companies.

Education and Training:

A bachelor’s degree in engineering or a related discipline is required; a master’s degree is desirable.

Professional or Trade Associations:

Association for the Advancement of Medical Instrumentation (AAMI), American College of Clinical Engineering (ACCE)

The Details: Renaming of Existing Detailed Occupation: Changing “Medical Equipment Repairers” to “Healthcare Technology Management—Technicians”

We are proposing that the detailed occupation currently listed as “Medical Equipment Repairers” be renamed “Healthcare Technology Management—Technicians” and moved to the category “17– Architecture and Engineering Occupations.” The individual job titles previously found under “Medical Equipment Repairers” should be moved under this renamed occupation (the chart below more visually outlines the specific proposed changes).

Outline of Specific Proposed Changes:

Proposed SOC Code	Proposed SOC Title	Proposed SOC Direct Match Title
17-0000 Architecture and Engineering Occupations	Healthcare Technology Management--Engineers (Newly proposed title)	Clinical Engineer (newly proposed title)
17-0000 Architecture and Engineering Occupations	Healthcare Technology Management--Engineers (Newly proposed title)	Clinical Systems Engineer (newly proposed title)
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Biomedical Electronics Technician
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Biomedical Equipment Technician
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	BMET
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Certified Biomedical Equipment Technician
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Durable Medical Equipment Technician (Formerly Durable Medical Equipment Repairer)
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Electromedical Equipment Technician
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Radiology Equipment Specialist (formerly Radiology Equipment Servicer)
17-0000 Architecture and Engineering Occupations (Formerly 49-0000 Installation, Maintenance, and Repair Occupations)	Healthcare Technology Management--Technicians (Formerly Medical Equipment Repairers)	Surgical Instrument Technician (formerly Surgical Equipment Mechanic)