



COLLEGE of AMERICAN PATHOLOGISTS

March 7, 2025

Representative Matt Shaheen
Texas House of Representatives
Room GS.6, P.O. Box 2910
Austin, TX 78768

Via Email: matt.shaheen@house.texas.gov

Re: Opposition to House Bill 2845 (Infringement on Medical Examiner Authority)

Dear Representative Shaheen:

The College of American Pathologists (CAP) is in opposition to your sponsored House Bill 2845, which would statutorily prescribe the categorization by Medical Examiners of certain deaths attributed to controlled substances.

The American Medical Association (AMA) in its policy (H-85.498) states:

- Our American Medical Association supports the independent authority of physicians to provide accurate and transparent postmortem assessments and death investigation reporting in a manner free from undue influence.
- Our AMA will advocate with state and federal governments to ensure laws and regulations do not compromise a physician's ability to use their medical judgement in the reporting of postmortem assessments and medicolegal death investigations

Similarly, the College of American Pathologists (CAP) in our policy states:

- "Protecting physicians providing forensic medical services (e.g., pathologists and non-pathologist physicians acting as medical examiners or coroners; i.e., "forensic physicians") from undue influence is necessary to ensure the independence of medicolegal death investigations, to safeguard medical integrity, and to preserve public trust and confidence."

Death certification is the practice of medicine and, as such, should not be statutorily dictated. House Bill 2845 limits the medical discretion and judgment of medical examiners in the performance of the forensic autopsy service and related findings and reports. The medical integrity of the forensic autopsy would be compromised by HB 2845, thereby undermining public confidence in this independent component of the criminal justice system. Accordingly, we oppose the legislation. Thank you for your courtesies and consideration of our comments.

Sincerely,

Donald Karcher, MD, FCAP
President, College of American Pathologists

cc: Michael Grimes, Imperium Public Affairs

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