



**THE NEW JERSEY SOCIETY OF
PATHOLOGISTS**
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December 13, 2016

Honorable Chris Christie
Governor, State of New Jersey
P.O. Box 001
Trenton, New Jersey 08625

Re: Support for Enactment of Assembly Bill 2332 / Senate Bill 976 (Update to New Jersey Laboratory Licensure Laws)

Dear Governor Christie:

On behalf of the New Jersey Society of Pathologists (NJSP), I am respectfully requesting the enactment for Assembly Bill 2332 / Senate Bill 976. This legislation is also supported by the College of American Pathologists (CAP). Assembly Bill 2332 / Senate Bill 976 extensively revises and updates the archaic provisions of New Jersey law that regulate the operation of clinical laboratories.

Both the CAP and NJSP diligently worked with other stakeholders to ensure that the legislation does not impair critical New Jersey governmental oversight by preserving regulatory standards that maintain and promote quality in the clinical laboratory. These objectives were accomplished by harmonizing state regulations to federal law when appropriate, while concurrently preserving the state's authority to exceed federal standards when necessary to protect the public health and ensure quality.

The bill in some areas broadens the application of state regulation to areas that are medically appropriate and require quality oversight, as in the case of anatomic pathology, and exempts some diagnostic settings where regulatory oversight can be an impediment to new technology adoption or an unnecessary administrative encumbrance, specifically with respect to the point of care setting.

The legislation also establishes a clear statutory foundation for recognizing existing regulatory relationships between accreditation entities and the department for purposes of reducing duplicative compliance burdens on both the laboratories and the department. Qualifications for some laboratory personnel and directorships are

maintained at the status quo, while other qualifications deemed unnecessary in light of technological changes are dispensed under the bill, with respect to waived testing.

We believe that, unlike the prior version of the legislation, this version provides a modern regulatory framework that promotes quality in laboratory and pathology services for patients, as was our paramount objective and interest.

For these reasons, I strongly urge enactment of Assembly Bill 2332

Sincerely,

A handwritten signature in black ink that reads "Brian Erlor MD PhD". The signature is written in a cursive style.

Brian Erlor, MD, PhD
President, New Jersey Society of Pathologists

cc: James DiGuilio, Esq., Senior Counsel, Office of the Governor
Laurie Clark, Senior Counsel, New Jersey Society of Pathologists
Barry Ziman, College of American Pathologists

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