



# COLLEGE of AMERICAN PATHOLOGISTS

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July 14, 2023

Honorable Denis Richard McDonough  
Secretary of Veterans Affairs  
Department of Veterans Affairs  
810 Vermont Avenue NW  
Washington, DC 20420

**Subject: Notice of Request for Information on the Department of Veterans Affairs;  
Cytotechnologists Standard of Practice**

Submitted via Electronic Submission to [www.regulations.gov](http://www.regulations.gov)

Dear Secretary McDonough:

The College of American Pathologists (CAP) appreciates the opportunity to provide input on the Request for Information on the Department of Veterans Affairs; Cytotechnologists Standard of Practice. As the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs, the CAP serves patients, pathologists, and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine worldwide. Pathologists are physicians whose timely and accurate diagnoses drive care decisions made by patients, primary care physicians, and surgeons. When other physicians need more information about a patient's disease, they often turn to pathologists who provide specific diagnoses for each patient. The pathologist's diagnosis and value are recognized throughout the care continuum and many patient encounters.

### **Cytotechnologists Standards of Practice**

Cytotechnologists play an important role in the laboratory, aiding in the diagnosis of disease by studying microscopic cells of the body to detect cancer, viral and bacterial infections, and other abnormal conditions. A fully staffed and trained laboratory workforce in Veterans Administration hospitals is essential to providing the high-quality care our nation's veterans deserve.

In response to the Department's Request for Information, **the CAP does not agree with the interchangeability between the terms "cytotechnologist" and "cytologist."**

The use of the proposed name "cytologist" for persons doing cytotechnology work creates confusion as it is a designation used by some physicians who practice cytopathology internationally. We believe clarity in language pertaining to the variety of roles in the clinical laboratory is important as it potentially impacts government regulations, health care policy, as well as patients. The use of a designation that in many international laboratories refers to physicians who practice cytopathology introduces confusion into the worldwide dialogue concerning the practice of laboratory medicine. If adopted, we are concerned this would increase the likelihood of role confusion and mislead healthcare policymakers, regulators, and patients. As pathologists, we find that this proposed name



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change runs counter to our efforts to create clarity in terminology in pathology and laboratory medicine.

We believe that in order to avoid confusion over professional licensing and scope of practice between these two professions, a clear delineation of professional nomenclature should be maintained. Additionally, confusion or uncertainty over roles and responsibilities in the laboratory workflow could lead to work being assigned to and performed by individuals who may not be trained to perform that work. This has the potential to jeopardize individual patient health outcomes. Taken at the scale of the VA system, this could lead to increased risk to the health and safety of our nation's veterans and their families. **The CAP requests that the VA avoid the interchangeable use of the terms cytotechnologist and cytologist to protect that distinction.**

The CAP acknowledges that the Standards and Guidelines for the Accreditation of Educational Programs in Cytology, published by The Commission on Accreditation of Allied Health Education Programs (CAAHEP), is the recognized authority of training and certification requirements for cytotechnologists. The CAAHEP develops credentialing criteria based on a multi-stakeholder process that provides opportunities for all relevant organizations and perspectives to shape policy. The CAP is one such stakeholder, and is one of 4 sponsors the CAAHEP Standards and Guidelines. This process ensures that educational programs in cytotechnology produce graduates who have all the skills and knowledge necessary to execute the duties of their chosen profession.

The CAP supports and agrees with the technical aspects related to training of cytotechnologists as contained in CAAHEP's Standards and Guidelines for the Accreditation of Educational Programs in Cytology. The CAP refers the VA to this document regarding all questions pertaining to required trainings, factors related to the implementation of training practices in the States, variances in practices, or issues arising from conflicts with State laws, regulations, or requirements for the practice of cytotechnology.

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In closing, the CAP supports the VA's efforts to create national standards of care that set a uniform and high standard for certification requirements for laboratory professionals. Such requirements must be based on nationally approved standards for education and training. Additionally, the CAP requests that the VA use the accurate nomenclature to describe the roles of laboratory professionals in this and future rulemakings. Clear delineation of responsibilities within the laboratory workflow is essential for ensuring optimal individual health outcomes, protect the public, and give our nation's veterans the high-quality care they deserve.



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Thank you for the opportunity to submit these comments. The CAP looks forward to working with the VA. Please direct questions on these comments to Andrew Northup at 202-354-7128 or [anorthu@cap.org](mailto:anorthu@cap.org).

Sincerely,

Emily E. Volk, MD, FCAP  
President, College of American Pathologists