



COLLEGE of AMERICAN PATHOLOGISTS

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;
Histopathology Technologists Standard of Practice**

Submitted via Electronic Submission to www.regulations.gov

Dear Secretary McDonough:

The College of American Pathologists (CAP) appreciates the opportunity to provide input on the Request for Information (RFI) on the Department of Veterans Affairs (VA); Histopathology Technologists 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.

'Histotechnologists' Standard of Practice

The VA aims to set national standards of care for members of the Veterans Health Administration workforce. These standards of care establish clear and precise job descriptions which will allow for an individual employed in a given role in a VA health system to practice their profession at any facility within the VA system, regardless of the state licensure requirements. This will benefit VA patients by ensuring the same high standard of care anywhere in the country and will allow the VA the flexibility to send skilled workers to facilities where they are needed, when they are needed.

This process must begin with clear and accurate names for the workforce positions to which the standards of care will apply.

The correct nomenclature for a specialized medical laboratory technician who studies tissue samples **is a histotechnologist**. There is **no non-physician profession categorized or referred to as "Histopathologist" in existence**.



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The CAP requests that the VA use the accurate nomenclature for the roles in the laboratory workforce. Accurate use of nomenclature will avoid confusion around certification requirements as well as responsibilities within the laboratory workflow, reducing the risk of employees performing tasks they are not trained to do and the associated risks to patient outcomes.

Histotechnologists fulfill an important role in the laboratory workflow, preparing human tissue specimens for examination under the microscope. They work as members of a laboratory team under the supervision of a pathologist and conduct research. Pathologists should always have **direct supervision** of histotechnologists in clinical laboratories and pertinent activities. As direct supervisors for histotechnologists, pathologists should retain full, unfettered authority to qualify clinical laboratory personnel as meeting personnel qualifications for histotechnologists.

In response to the RFI, the CAP acknowledges that the National Accreditation Agency for Clinical Laboratory Sciences (NAACLS) is the body that determines credentialing requirements for histotechnologist education. The NAACLS develops their credentialing criteria based on a multi-stakeholder process that provides opportunities for all relevant organizations and perspectives to shape policy. This process ensures that educational programs in histotechnology produce graduates who have all the skills and knowledge necessary to execute the duties of their chosen profession. The CAP refers the VA to NAACLS's standards guide for the histotechnologist curriculum requirements and encourages the VA to seek graduates from NAACLS-accredited programs.

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.

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.

Sincerely,

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