



# COLLEGE of AMERICAN PATHOLOGISTS

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April 20, 2026

Representative Peter F. Egan, Sr.  
900 North 3rd Street  
Baton Rouge, LA 70804

RE: Opposition: House Bill 1216 (Provides Relative to the Guidelines for  
Clinical Laboratory Personnel)

Dear Representative Egan,

On behalf of the College of American Pathologists (CAP) and the Louisiana Pathology Society (LPS), we write to oppose the proposed change in professional nomenclature from “Cytotechnologist” to “Cytologist.”

This change creates significant concerns regarding public understanding, patient safety, and regulatory clarity. Under CLIA '88 regulations (42 CFR 493.1483), the federal law governing clinical laboratory practice, “Cytotechnologist” is a clearly defined role from “Pathologists” practice of medicine. Departing from this federally recognized terminology risks legal uncertainty and potential compliance issues.

The term “Cytologist” is inherently ambiguous and may mislead patients and the public. No other state recognizes “Cytologists” and of the states with clinical laboratory personnel licensure laws, states only recognize the use of “Cytotechnologist.” In medical practice, the suffix “-ologist” commonly refers to a physician specialist, which could create confusion with Pathologists who are licensed to render diagnostic interpretations. The current title, “Cytotechnologist,” accurately reflects the education, training, and supervised role of these professionals within the clinical laboratory.

Additionally, changing the title risks blurring the distinction between screening functions and medical diagnosis, potentially leading to misunderstandings about scope of practice. It may also create pressure for unintended scope expansion, undermining established supervision requirements that safeguard patient care.

Finally, the proposed change would introduce inconsistency across federal and state regulations, accreditation standards, and licensure frameworks, all of which currently reference “Cytotechnologist.” This would create unnecessary administrative burden without a clear benefit to patients or the public.

Additionally, the CAP supports the adopted House Committee Amendment #3786 number nine (9), which advances consistent, high-quality standards for the education and training programs for clinical laboratory professionals while providing a clear enforcement date for entities subject to this Act.

For these reasons, the CAP and LPS respectfully urges you to reject the proposed name change and retain the title “Cytotechnologist” to preserve clarity, consistency, and patient safety.



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Thank you for your consideration and courtesy.

Sincerely,

Jim Zhai, MD, FCAP  
President, College of American Pathologists

cc: Maria W. Bowen, Vice President, Governmental Affairs, Louisiana  
State Medical Association  
Vincent Culotta, MD, Executive Director, Louisiana State Board of  
Medical Examiners (Via email: [vculotta@lsbme.la.gov](mailto:vculotta@lsbme.la.gov))