



# COLLEGE of AMERICAN PATHOLOGISTS

August 20, 2020

Karen Atkison, MPA, CT(ASCP)CMIAC  
Chair  
CAAHEP Cytotechnology Program Review Committee  
25400 US Highway 19 North  
Suite 158  
Clearwater, FL 33763

*Submitted via email to Ms. Atkison*

Dear Ms. Atkison:

The College of American Pathologists (CAP) appreciates the Cytotechnology Program Review Committee (CPRC) responses to our clarifying questions but remain concerned about the proposed cytology professional titles new designation, therefore, we do not support a change. We are committed to a sustainable qualified cytotechnology workforce and support the development of a master's degree level for cytotechnologists (CTs); but do not believe a name change is necessary to achieve this goal. While we appreciate your thoughtful responses, our concerns remain changing the professional designation will have impact on the current and future workforce of cytotechnologists and the broad clinical laboratory. In reviewing your response, we have identified two areas that need further clarification before the CAP can appropriately assess whether a new professional designation is needed. Those areas are a solid foundation of baseline data including rigorously identified impacts on the current and future medical community through independently validated studies and the professional designation of Cytologists.

## **Baseline Data**

While we appreciate the CPRC's work in developing this proposal based on majority opinion and feedback, baseline data independently validated is necessary to make a sound evidence-based decision. As you explained in your response letter, that Master's degree level professions generally do not refer to themselves at the technologist level, which should be a factor among many others in a professional designation change; however, this change does not align with the intent of the CPRC's work. The intent of the CPRC's work is to develop a standardized curriculum to train CTs for emerging roles given the difficulties CTs have had in obtaining appropriate knowledge and new skills commensurate for the work they are currently performing in clinical laboratories. Since many CTs are performing these functions currently, we question the need for a change in professional designation. In addition, the federal regulatory and state licensure requirements will be impacted. There is a cost associated with federal and state regulatory changes so we question how these costs will impact clinical laboratories and the workforce given the restrictive reimbursement climate for clinical laboratories. It could be cost prohibitive for clinical laboratories therefore impacting CT demand. More study is needed on the financial and regulatory impact before we can make a sound decision on any changes to professional designations.



**Professional Designation of Cytologists**

The CAP appreciates CPRC re-opening the discussion on a professional name from Diagnostic Cytologists to Cytologists. As was stated above, we question the need for a name change at this time since the standards and guidelines for the CT curriculum are under development. Our focus should remain on standardizing the CT curriculum to ensure a sustainable supply of CTs to achieve our goal. Furthermore, we caution about using the name cytologists since it is also used by physicians in Europe to describe non-gynecological practice of cytopathology. As we stated above, we recommend considering a name change once the standards and guidelines have been developed and an assessment is done to determine how expansive the scope of work is beyond current functions being performed today.

Thank you for your serious consideration of our comments as we all strive to work collaboratively to build a sustainable qualified cytotechnology workforce. Please feel free to contact Helena Duncan at [hduncan@cap.org](mailto:hduncan@cap.org) if you have any questions on these comments.

Sincerely,

Patrick Godbey, MD, FCAP  
President, College of American Pathologists