



COLLEGE of AMERICAN PATHOLOGISTS

February 2, 2021

Amber Donnelly PhD, MPH, SCT(ASCP)
Chair
CAAHEP Cytotechnology Program Review Committee
25400 US Highway 19 North
Suite 158
Clearwater, FL 33763

Submitted via email to Dr. Donnelly

Dear Dr. Donnelly:

The College of American Pathologists (CAP) reviewed the Cytotechnology Program Review Committee (CPRC) Proposed Revisions for Standards and Guidelines for the Accreditation of Educational Programs in Cytology and requests this proposal be rescinded until the CAP's concerns have been addressed. As a sponsoring organization of the CPRC, the process to build a consensus on the new professional title's designations has not been followed. We understood a name change could not be instituted unless all sponsors approved of the change. Since August 2020, the CAP communicated our opposition to this name change due to lack of baseline data independently validated and continued to question the necessity of such a change without data to rigorously evaluate impacts on the current and future medical community.

We also request this rescission to further discuss our concerns with the proposed entry-level competency in the standards and guidelines revisions. Specifically, the CAP provided a response in our September 2020 letter outlining our concerns and recommendations for these proposed entry-level competencies. To date, we have not received any response to that letter, or the concerns outlined. Specifically, we had concerns about inclusion of anal cytology as an area of independent practice for cytotechnologists as well as other minor changes. We also identified a new issue with cytotechnologists performing rapid on-site evaluations/assessments. None of these changes included in the newly identified issue have been approved by the CAP.

We are committed to a sustainable qualified cytotechnology workforce and support the development of a master's degree level for cytotechnologists (CTs); however, believe additional work is needed to reach that goal.

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 if you have any questions on these comments.

Sincerely,

Patrick E. Godbey, MD, FCAP



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President, College of American Pathologists

Cc: CAAHEP Standards Committee Review