

**California Lab Personnel Law Issues:
Lab Field Services, CDPH**

Please provide written email feedback (organized by and in the order of each Specific Issue number, see below 1-14) to lfsrecep@cdph.ca.gov.

Special Note: Comments for each of the numbered items below cannot exceed 500 characters in length. The first 500 characters will be used and the remaining text discarded.

- (1) NAACLS*-accredited training programs are not accepted for licensure in CA.

Proposal: Accept NAACLS.

Impact: Facilitate approval of training for some applicants in and outside CA. Concern about length of training.

- (2) The four-year look back of certification exam approval requires older certificants to take the exam again.

Proposal: Retain look back which was based on public comments to regs.

Impact: Applicants thereby demonstrate current, broad knowledge of specialties.

- (3) The ratio of MLT to supervisor is 4:1.

Proposal: Retain as this was established based on public comments to regs.

Impact: MLTs can work without CLS supervision for Waived tests, but need supervision for Moderate tests.

- (4) Recognition of post doctorate trainees in CA is difficult

Proposal: Adopt post doctoral trainee license to allow testing, position recognition.

Impact: Streamlines and clarifies pathway of post doctorates to licensure in CA.

- (5) Training for specialist license must be done in a CLIA-certified, LFS-approved lab.

Proposed: ILAC-certification for non-US, retain CLIA-certified requirement for US.

Impact: Increases specialist license applicants from non-US. Does not allow on the job, research or non-clinical lab experience. Restricts applicants from non-traditional sites.

- (6) An unlicensed person is not authorized to train a licensed trainee.

Proposal: An approved program can designate an unlicensed person to train.

Impact: This shall allow doctoral scientists, vendors, professors to participate in training.

- (7) The ratio of licensed trainee to licensed trainer is 2:1.

Proposal: Is this necessary??

Impact: Current requirement may limit training programs.

- (8) There is no transition for MLTs to CLS licensure.

Proposal: BS degree required and 6-month additional training program.

Impact: This may facilitate articulation of MLTs to CLS licensure.

(9) A licensed cytotechnologist is limited to gyn and non-gyn cytology.

Proposal: Expand their work scope to include FISH, HPV, Immunohisto- chemical staining by microscopic analysis.

Impact: Expands work scope for qualified cytotechs.

(10) A licensed clinical genetic molecular biologist is limited to genetic tests on humans.

Proposal: Redefine “clinical genetic molecular biology tests” to include infectious diseases, metabolic tests and others.

Impact: Expanded work scope.

(11) Persons with specialist licenses have designated work scopes.

Proposal: Continue to require approved training and second license. On the job training in another specialty is not practical.

Impact: Difficulty in expanding work scopes. Retains quality of training.

(12) Certification of histotechs is not recognized.

Proposal: Recognize certification with less required supervision.

Impact: Certified histotechs will be able to work under general rather than direct supervision.

(13) A CPT who works at multiple locations for the same employer must post the certificate at each location.

Proposal: Certificate posted at primary location, copies authorized elsewhere for same employer. Duplicates for second employer.

Impact: Reduce cost while providing proof of certification.

(14) Doctoral embryologists cannot perform lab tests in CA.

Proposal: Establish licensing standards for clinical embryologists doing clinical lab tests.

Impact: Improved employability of qualified persons in CA.