

# CLTAC SUBCOMMITTEE ON CLS EDUCATION AND TRAINING

## POSITION PAPER

### Minority Report by William N. Bigler

This minority report is submitted due to my concern that if adopted the majority report would worsen the current situation for CLS licensure in California. Four suggested changes are indicated by **bold type and strikethrough** (deletion) or by **bold type** (insertion). For each change the page number in the majority report and the immediately preceding line(s) of the majority report are included without bold type. Reasons for the suggested changes and a comment about the need for a change in current law are at the end.

-----SUGGESTED CHANGES FOR THE MAJORITY REPORT -----

end of page 1; top of page 2

The professional program may be completed concurrently with the baccalaureate degree.

CHANGE #1 – delete

~~In addition, before or during the professional program the examinee must have completed:~~

- ~~1.) 16 semester or equivalent quarter hours of chemistry, including instruction in analytical and biological chemistry;~~
- ~~2.) 18 semester or equivalent quarter hours of biological science, including instruction in immunology, hematology and medical microbiology which may include bacteriology, mycology, virology and parasitology; and~~
- ~~3.) 3 semester or equivalent quarter hours of physics, including instruction in principles of light and electricity.~~

-----  
end of page 2; top of page 3

....care of specimen; hazards and complications; and postpuncture patient care.

Change #2 – delete

~~The program shall provide at least 52 weeks of practical and didactic training of which at least 32 weeks shall be practical training in chemistry, hematology, microbiology, immunology, immunohematology and molecular biology in a licensed clinical laboratory.~~

-----

top of page 4

- (1) Name and address of the training program;
- (2) Location(s) at which training shall be conducted;

CHANGE #3 - delete

- ~~(3) Name(s) and qualifications of the person(s) directing the program;~~
- ~~(4) Name(s) and qualifications of person(s) instructing in the program;~~
- ~~(5) Didactic curriculum showing classes, objectives, topics, instructor and time spent;~~
- ~~(6) Practical training showing objectives, techniques taught, instructor and time spent;~~
- ~~(7) Phlebotomy training meeting the requirements listed above;~~
- ~~(8) Lists of equipment, supplies and materials used for instruction;~~ and

-----  
middle of page 4

To apply for renewal, the training program shall file an application at least sixty days prior to the end of the approval period providing the following:

- (1) Name and address of the training program;
- Change # 4 – delete
- ~~(2) Any changes in directors, instructors, didactic, practical or phlebotomy instruction, equipment, supplies and materials that were made to the program since the previous application;~~

-----RATIONALE FOR THE PROPOSED CHANGES -----

Change #1

- (a) CLS programs, all of which would be required to maintain NAACLS accreditation in order to obtain State approval, must be responsible for recruiting the best possible students in order to maintain satisfactory graduation rates and success rates on professional examinations.
- (b) Courses specified include titles that are no longer available at the majority of UC and CSU campuses.
- (c) If programs are willing to accept apparently highly capable students from such campuses and provide the missing essential background education during the professional education, specification of prerequisite courses in regulations would be and is now a deterrent to applicants who wish to enter the field.
- (d) Programs may require admission qualifications that are more restrictive than the minimum required by the state.

Change #2

- (a) Specification of a minimum 52 week program length, with 32 weeks of practical training in a clinical laboratory, sounds good and sounds like current LFS practice; but, it would be a significant change and would have, perhaps unanticipated, impact on the eligibility of credentialed CLSs for licensure.
- (b) Currently DHS admits graduates from some university based CLS programs in other states to the California CLS exam based on completion of an academic year of practical training, i.e., a minimum of 32 weeks. DHS neither requires nor evaluates the content of an additional 20 weeks in those programs.
- (c) The majority report would advise DHS to no longer admit graduates from such university based programs unless the programs could demonstrate 20 weeks of additional didactic or practical professional training. The impact would be to further decrease the ability of graduates of accredited CLS programs to qualify for the California CLS license.
- (e) The position of this minority report is that graduation from a NAACLS accredited CLS program should be both necessary and sufficient qualification for eligibility to take the California CLS examination, independent of the structure of the curriculum of the NAACLS accredited program.

-----  
Changes #3 and #4

- (a) Deletion of items (3)-(8) (change #3) and item (2) (change #4) would not result in loss of information for DHS because all of this information must be contained in the required NAACLS accreditation Self-Study, which the majority report advises (Comment #3) DHS to accept during DHS program approval procedures.
- (b) If regulations specify items (3)-(8) and (2), DHS may feel compelled to develop procedures and formats for submitting information that are distinct from or redundant with the NAACLS Self-Study.
- (c) CLTAC could replace these two deletions with **“(3) A copy of documentation submitted to NAACLS with each accreditation or reaccreditation application.”**
- (d) In the majority report there are other paragraphs which are redundant with the maintenance of NAACLS accreditation and might be considered for deletion by CLTAC. These paragraphs all sound good but they might lead to DHS development of procedures that would be unnecessary and redundant with NAACLS accreditation. These are paragraphs 3, 5, 6, 7, 8, and 9 of the portion of the majority report that starts on page 2 with “Section 1035, Training school....” and continues on page 3.

## **NEED FOR CHANGE IN THE LAW**

In order to implement Comment #2 of the majority report, “It is the intent of the subcommittee that regulations regarding the education and training of clinical laboratory scientists provide maximum flexibility while maintaining high standards”, I believe that there must be a change in current law. CLTAC could advise DHS to seek a needed legislative change.

### **HIGH STANDARDS**

I believe that high standards can be maintained by (1) approving programs that have NAACLS accreditation and (2) withdrawing state approval of a program, if the success on professional examinations by graduates of a program does not meet a specific standard (e.g., majority report - bottom of page 4).

### **FLEXIBILITY**

A current barrier to flexibility is in B&P Code Section 1263, which requires that applicants have completed three years of college, i.e., 90 semester units, before a CLS trainee license can be issued. Currently some NAACLS accredited programs utilize “2+2” curricula, i.e., practical clinical experience and didactic education are integrated during the last two years of a B.S.M.T. degree program. Such programs are not allowed in California because of Section 1263. The graduates of such programs in other states are not eligible for the California CLS examination because their programs do not conform to Section 1263.

Before 2+2 programs can exist in California and before 2+2 graduates can be licensed in California, the “90” in section 1263 must be changed to “60”. This change would not raise or lower the standards for CLS education; it would allow greater flexibility for CLS curricula and slightly increase the available CLS workforce.