



## **CYTOTECHNOLOGIST STATE LICENSURE: Proposal to State Legislatures**

**The American Society of Cytopathology (ASC)** is a distinguished professional society of physicians, cytotechnologists and scientists who are dedicated to the cytologic method of diagnostic pathology. The ASC's diverse membership of more than 3500 individuals includes representatives from the US and other countries who share a vision of education, research and continuous improvement in the standards and quality of patient care as applicable to cytopathology.

The ASC neither advocates for or against licensure for cytotechnologists, but recognizes that when such efforts are considered by individual states, cytotechnologists should have a voice in the legislative process. The following guidelines were developed by an ad hoc task force comprised of the Legislative and Regulatory Proceedings Committee, in conjunction with the former Cytotechnologist Advisory Committee, to assist legislators in developing laws that govern the licensure of cytotechnologists. In recognition of the importance of active involvement in state affairs concerning our profession, the ASC encourages its members to urge state legislatures to consider the following model language that describes the qualifications and practice of cytotechnologists.

### ***Proposed Legislative Definition of "Cytotechnologist/ Cytologist"***

"Cytotechnologist/Cytologist": A clinical laboratory professional specializing in the analysis of patient specimens for the purpose of screening for or diagnosis of disease processes at the cellular level. These specialists assist with the collection and preparation of specimens, and detection and interpretation of normal and abnormal cells, as well as infectious agents using microscopic morphology, special stains, immunocytochemistry and molecular techniques. In addition, these individuals may be responsible for all activities related to the pre-analytic, analytic, and post-analytic phases of testing including, but not limited to test selection and development, equipment selection, operation and maintenance, result reporting, quality control and assurance and statistical analysis of performance. The Cytotechnologist may also have a supervisory and educational role.

### ***Recommended Minimal Requirements for Qualification as a Cytotechnologist***

-This language is adopted, verbatim, from the Clinical Laboratory Improvement Amendments of 1988, Final Rules, Federal Register, Vol 57(40): 28 February 1992.



1. Individuals that meet one of the following qualifications may be licensed as a ***cytotechnologist / cytologist***:
  - a) Have graduated from a school of cytotechnology accredited by Commission on Accreditation of Allied Health Programs (CAAHEP); prior to 1996, have graduated from a school of cytotechnology accredited by the Committee on Allied Health Education and Accreditation (CAHEA); **or**
  - b) Be certified in cytotechnology by a certifying agency approved by Health and Human Services (HHS); **or**
  - c) Before September 1, 1992-
    - i. Have successfully completed 2 years in an accredited institution with at least 12 semester hours in science, 8 hours of which are in biology, **and**
      - a. Have had 12 months of training in a school of cytotechnology accredited by an accrediting agency approved by HHS, **or**
      - b. Have received 6 months of formal training in a school of cytotechnology accredited by an accrediting agency approved by HHS and 6 months of full-time experience in cytotechnology in a laboratory acceptable to the pathologist who directed the formal 6 months of training, **or**
    - ii. Have achieved a satisfactory grade to qualify as a cytotechnologist in a proficiency examination approved by HHS and designated to qualify persons as cytotechnologists, **or**
  - d) Before September 1, 1992, have full-time experience of at least 2 years or equivalent within the preceding 5 years examining slide preparations under the supervision of a pathologist and before January 1, 1960, must have-
    - i. Graduated from high school; **and**
    - ii. Completed 6 months of training in cytotechnology in a laboratory directed by a pathologist or other physician providing cytology services; **and**
    - iii. Completed 2 years of full-time supervised experience in cytotechnology; **or**



- e) On or before September 1, 1993, have full-time experience of at least 2 years or equivalent examining cytology preparations within the preceding 5 years in the United States under the supervision of a pathologist; **and**
    - i. On or before September 1, 1994, have met the requirements in either paragraph 1a or 1b of this section.
2. Individuals that meet one of the following qualifications may be licensed as a ***Cytology Supervisor***:
- a) Be qualified as a cytotechnologist under the conditions in paragraph 1 above, and
  - b) Have at least 3 years of full- time experience (2,080 hours per year) as a cytotechnologist in the preceding 10 years.

### ***Proposed Scope of Practice for Cytotechnologists***

1. Assist in the collection of patient specimens and specimen evaluations
2. Select the most appropriate preparation and staining techniques for the specimen and for diseases in the differential diagnosis.
3. Prepare and evaluate stains and other testing reagents according to standard operating procedures.
4. Prepare patient specimens according to standard operating procedures for ancillary testing, including but not limited to in situ hybridization, immunocytochemistry, and amplified nucleic acid detection.
5. Establish basic quality control and quality assurance procedures on equipment, stains, ancillary tests and reagents; evaluate the results of quality control and implement corrective action as needed.
6. Validate new testing methods and equipment and perform comparison studies between new and existing procedures to determine the performance specifications compared to manufacturers' claims.
7. Evaluate, mark and interpret representative areas of benign and abnormal processes observed microscopically in patient specimens, manually or automated instruments.
8. Perform testing and evaluate specimens for ancillary studies such as cellblocks, molecular tests and immunocytochemistry.
9. Operate, calibrate, and conduct periodic performance checks and maintenance on laboratory equipment and instrumentation related to all cellular based testing.
10. Troubleshoot instrument malfunctions.



11. Establish and monitor laboratory safety programs in compliance with regulations.
12. Use the laboratory information system or other method to report patient results according to established guidelines.
13. Write laboratory standard operating procedures.
14. Perform orientation and supervision for students, laboratory assistants, cytology processing technicians and new or less skilled laboratory personnel.

### ***Proposed Scope of Practice for Cytology Supervisors***

All components of Scope of practice for cytotechnologist in addition to:

1. Provide supervision of cytotechnologists, cytoprep technicians and support staff assigned to the department.
2. Train the above-mentioned employees and assess periodically for competency.
3. Investigate and test new methodologies and instrumentation that is applicable for primary interpretation and ancillary testing.
4. Perform all aspects of personnel management including, but not limited to establishment of daily working and training schedules, approval and monitoring of time off, preparation of employee evaluations, employee counseling, writing job descriptions, hiring and firing activities, interview candidates, and resolve personnel conflicts.
5. Develop and maintain policy and procedure manuals, as well as performance improvement plans.
6. Ensure adherence to federal, state, and local regulations and published practice guidelines.
7. Provide inventory control and management.
8. Ensure compliance with fire, safety and disaster guidelines.
9. Serve as diagnostic consultant for diagnostic dilemmas.
10. Oversee activities for inspections by accrediting agencies.
11. Implement, assist with and evaluate research and development projects as directed by pathologists.
12. Provide customer service for the utilization and selection of cytopathology services.
13. Prepare budgets to meet financial objectives, including purchase of supplies and new equipment and staffing according to organizational benchmarks.



## ***Proposed Continuing Educational Requirements for Cytotechnologists and Cytology Supervisors***

-These guidelines are adopted from the recommendations of the American Society for Clinical Pathology (ASCP) Board of Registry Certification Maintenance Program, available at: <http://www.ascp.org/bor/cmp/>

- Total continuing education (CE) points required every 3 years: 36 (12 hours annually, where 1 point = 1 credit hour)
- Special CE requirements each 3-year period:
  - 1 point in laboratory safety
  - 2 points in area of certification (e.g. cytology)
  - Remaining points in area of specialty, management, education or other related laboratory areas of interest

### ***Additional Recommendations for Legislatures***

The ASC supports the concept of reciprocity for state licensure. If an individual has already obtained a license in another state, we recommend that the state consider an expedited process of licensure that accepts the documentation and confirmation of certificates from the other state.

The ASC recommends that the state accept the ASCP Board of Registry certification in cytotechnology as the equivalent of a state examination documenting proficiency in the practice.

*Approved by the ASC Executive Board 11/7/06*