APHL supports ABB’s recommendation to change CLIA’s Interpretive Guidelines for Section 493.1443(b) as follows:

"An acceptable doctoral degree is a Doctor of Philosophy- Ph.D., Doctor of Science - D.Sc., Doctor of Dental Surgery-D.D.S., Doctor of Veterinary Medicine-D.V.M., or Doctor of Public Health Dr.P.H. acceptable to a CLIA-approved certifying board for a director of high complexity testing."

APHL recommends that CLIAC consider this recommendation from ABB to assure the continued availability of board-certified public health laboratory directors from an expansive range of academic achievements. HHS approved certification boards should continue to be able to approve acceptable earned doctoral degrees in a chemical, physical, biological, or clinical laboratory science from accredited institutions based on the academic content rather than the name of the degree.

APHL is willing and ready to assist in further deliberations on this matter.