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Public health laboratory directors in the United States have historically had doctoral degrees (DrPH, PhD, DVM and ScD) from a variety of scientific disciplines and been certified by several different certification boards approved by the Department of Health and Human Services (HHS).

The American Board of Bioanalysis (ABB), a board that has provided certification for many successful public health laboratory directors, has submitted a statement to CLIAC regarding implementation of the State Operations Manual, Appendix C - Survey Procedures and Interpretive Guidelines for Laboratories and Laboratory Services, Interpretive Guidelines.

APHL supports AAB'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.