April 30, 2020

The Honorable Andrew Cuomo
Governor, the State of New York
State Capitol
Albany, NY 12224

The Honorable Howard Zucker, MD, JD, LLM
Commissioner of Health, New York Department of Health
Corning Tower Building
Empire State Plaza
Albany, NY 12237

MaryEllen Elia
Commissioner of Education
New York State Education Department
89 Washington Ave
Albany, New York 12234

Dear Governor Cuomo, Commissioner Elia, and Commissioner Zucker:

The American Society for Clinical Pathology Board of Certification Board of Governors (ASCP BOC BOG) and our sponsoring and participating societies are writing to raise awareness of the important role that the laboratory workforce plays in the fight against COVID-19. Our nation’s states are actively engaging in a variety of measures, such as developing a network of healthcare volunteers and waiving personnel licensure requirements, to ensure there are enough healthcare professionals to meet the surge in demand for COVID-19-related patient care services. We are writing to urge that you make certain that the laboratory professionals workforce is included in these efforts.

Laboratory professionals play a critical role in diagnosing, staging, and monitoring patients who have been infected with the COVID-19 virus, known as SARS-CoV-2. The services these medical professionals perform is also fundamental to surveillance (screening) efforts to track the spread of this virus and to identify how best to allocate scarce medical resources, like ventilators. Maryland Governor Larry Hogan, Chair of the National Governors Association, acknowledged the importance of testing when he said, "Without the tests we really are flying blind, we’re sort of guessing about where the outbreaks are and what the infection rate and the hospitalization rates are. No state has enough testing," he commented.

Since commercial laboratories at hospitals, academic medical centers, and reference laboratories were granted permission\(^1\) to develop and use their own laboratory tests, our nation’s testing capacity has increased significantly. However, for our nation’s laboratories to succeed at testing everyone in need they will need a reliable supply of the skilled laboratory professionals that can perform the highly complex laboratory procedures used to identify COVID-19. Not surprisingly, clinical laboratories are vulnerable in that if a laboratory professional contracts the SARS-CoV-2 virus, it could damage a laboratory’s ability to provide testing services as other laboratory staff may be forced to self-quarantine.

When it comes to the laboratory workforce, patients are typically most familiar with phlebotomists, who are skilled at drawing blood for testing. Laboratory testing professionals examine and analyze body

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\(^1\) The Food and Drug Administration granted this authority on February 29, see here.
fluids, cells, tissues and whole organs. They look for bacteria, parasites, and other microorganisms; analyze the chemical contents of fluids; match blood for transfusions; look for abnormalities/changes in cells and tissue; and test for drug levels in the blood that show how a patient is responding to treatment. Laboratory professionals include medical laboratory scientists (also referred to as medical technologists), cytotechnologists, histotechnologists, and pathologists’ assistants, individuals who generally possess a bachelor’s degree or higher in a scientific discipline, as well as medical laboratory technicians and histotechnicians, individuals who generally possess an associate degree in a scientific discipline (See Careers in the Laboratory). Their roles can range from bench technician (individuals who run the tests) to laboratory manager or supervisor (professionals who oversee laboratory operations).

All of these individuals are under the oversight of a laboratory director. The Clinical Laboratory Improvement Amendments of 1988 outlines specific requirements and responsibilities for laboratory professionals serving in testing or oversight roles. All of these individuals are critical to quality laboratory operations.

In response to the COVID-19 pandemic, many states have taken steps to relax or waive state licensure requirements and/or sought out health care volunteers, including those from other states, to ensure access to an adequate healthcare workforce. While these efforts are important, it is unclear to us that these efforts have included the laboratory personnel needed to diagnose, treat and screen for the disease. We urge that as your state works to address its workforce needs that it keeps laboratory professionals in mind. Given our knowledge of the laboratory workforce and our extensive network of certified and/or licensed laboratory professionals, the ASCP BOC BOG stands ready to assist you if we can be of service.

The ASCP BOC’s mission is to provide excellence in certification of laboratory professionals on behalf of patients worldwide. We are considered the gold standard certification for medical laboratory professionals around the world. The ASCP Board of Registry (BOR) began in 1928. We are an independent, non-profit certification agency that develops appropriate standards and procedures to assure the competence of medical laboratory personnel and have certified almost 600,000 laboratory professionals in the United States and internationally. We are the only ANSI accredited certifying body of laboratory professionals in the United States and have one of the largest accredited certification programs (21 certifications) in the country.

We sincerely appreciate the work you are doing to address the COVID-19 pandemic in your state and if we can be of assistance on these efforts please contact me at Patricia.Tanabe@ascp.org or Matthew Schulze, Director of ASCP’s Center for Public Policy, at 202.403.9027 or Matthew.Schulze@ascp.org.

Sincerely,

Susan T. Johnson, MSTM, MT(ASCP)SBB
Chair
ASCP Board of Certification
The Honorable Andrew Cuomo, Horable Howard Zucker, MD, and Horable MaryEllen Elia
April 30, 2020
Page 3

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