

TO: Clinical Laboratory Improvement Advisory Committee

FROM: Amy M. Woron PhD, MS, MPH(c), M(ASCP)

DATE: October 30, 2018

RE: Response to the September 27, 2018 Federal Register notice for Public Comment on the Clinical Laboratory Improvement Advisory Committee (CLIAC) regarding proposed revisions to Clinical Laboratory Improvement Amendments (CLIA) **PERSONNEL REQUIREMENTS.**

Thank you for allowing public comment in the form of a personal response to 42 C.F.R. § 493.1443(b)(3) Hold an earned doctoral degree in a chemical, physical, biological, or clinical laboratory science from an accredited institution.

In my personal experience, the restrictive focus of degree titles noted above has prevented acceptance to take the ABB(PHLD) board exam. My educational background consists of:

- BS in Biology
- NAACLS approved program in Clinical Microbiology
- Graduate Certificate in Healthcare Administration
- MS in Biology, Sequence in Forensic Molecular Biology
- MPH with an Epidemiology concentration (*May '19*)
- PhD in Public Administration, dissertation contained a clinical component

My clinical management experience consists of:

- 1996 Medical technologist in a large teaching hospital
- 2002 Started in Public Health
- 2004 Supervisor
- 2009 Manager
- 2016 Assistant Director
- 2017 Deputy Chief

I have completed the Association of Public Health Laboratories Emerging Leader Program. The past 22 years of my life have prepared me to fill a critical workforce need of certified laboratory directors.

It is the responsibility of ABB to compare my qualifications to the C.F.R. and make a determination about meeting minimum criteria. As the C.F.R. is written, ABB made the correct decision. What I am proposing is that the C.F.R. is not addressing the reality of current degrees and skill sets needed for serving as the Administrator of a clinical laboratory. Taken literally, the C.F.R. would allow a Geologist to sit for the ABB general knowledge exam but reject a PhD in Public Administration skilled in policy, budgeting and administration.

Please note that the application to ABB is not a request to be handed a certification, it is a request to take an exam and prove oneself worthy of certification. By including non-traditional degrees in consideration with clinical experience, credentialing agencies would be in a better position to support the profession by providing well-rounded, well qualified Board Certified Laboratory Directors.

I truly appreciate the opportunity to provide a personal example of how the current verbiage is preventing otherwise qualified individuals the opportunity to contribute more to the profession. I look forward to your decision regarding the consideration of non-traditional terminal degrees.

Respectfully,

A handwritten signature in cursive script that reads "Amy M. Woron". The signature is written in black ink and is positioned above the typed name.

Amy M. Woron PhD, MS, MPH(c), M(ASCP)