



National Society for Histotechnology
3545 Ellicott Mills Drive, PMB 204
Ellicott City, MD 20143
P: 443-535-4060 ♦ F: 443-535-4055
E: histo@nsh.org
www.nsh.org

July 11, 2023

Ethan Kalett
Office of Regulations, Appeals and Policy (10BRAP)
Veterans Health Administration, Department of Veterans Affairs
810 Vermont Avenue NW, Washington, DC 20420

Re: Request for Information on Histopathology Technologists Standard of Practice

The National Society for Histotechnology (NSH) is responding to the *Request for Information on Histopathology Technologists Standard of Practice*. The National Society for Histotechnology is a non-profit professional membership organization representing histology professionals practicing in the medical and public health laboratory workforce. The National Society for Histotechnology supports practicing histologists worldwide by providing education to train and demonstrate competency in an increasingly complex medical laboratory testing environment. **We strongly urge the Department to define the standard of practice for both Histotechnicians and Histotechnologists as is current practice across the United States for the American Society for Clinical Pathology (ASCP) national certification and in the limited number of states where histotechnicians and histotechnologists are licensed.**

The laboratory workforce has been suffering from staffing shortages that are the result of several factors that have developed over the last 20 years. Low familiarity with laboratory medicine as a career option, declines in the number of training programs and students trained, high educational costs and low pay, have been longstanding issues. COVID has significantly worsened these problems by increasing workload levels, stress, and burnout. Currently, most medical and public health laboratories suffer from significant personnel shortages, and many are operating at or near crisis-mode. Leaving out Histotechnicians as part of the current practice will exacerbate the current staffing shortages impeding the ability of laboratories to provide timely test results. Prompt and accurate laboratory results are necessary to deliver high quality patient care to our veterans.

NSH supports the establishment of a national standard, inclusive of ASCP certifications, in place for all histology personnel (histotechnicians and histotechnologists). To this end we support the inclusion of histologists as personnel in CLIA. The absence of histology technicians and technologist in the CLIA regulations creates conflicting standards. Including histology technicians and technologists would establish a true national standard that would be applicable in every state, regardless of licensure.

To achieve the goal of a “standard of practice consistent with the national certifications” the standard must include histopathology technicians.

If you have any questions, please contact Luis Chiriboga, PhD, NSH Public Policy Task Force Chair at histo@nsh.org.

Sincerely,

A handwritten signature in cursive script that reads "Jerry Santiago". The signature is written in a dark ink and is positioned above the printed name.

Jerry Santiago
President
National Society for Histotechnology