DATE: July 8, 2024

TO: State Survey Agency Directors

FROM: Director, Quality, Safety & Oversight Group (QSOG)

SUBJECT: American Society for Clinical Pathology (ASCP) Board of Certification (BOC) Specialist in Cytology (SCT) as an Approved Board Certification for the Clinical Laboratory Improvement Amendments (CLIA) for Individuals Performing Testing in the Subspecialty of Cytology

Memorandum Summary

• Approval of New Board Certification for High Complexity Cytotechnologists—The Centers for Medicare & Medicaid Services (CMS) is approving the American Society for Clinical Pathology (ASCP) Board of Certification (BOC) Specialist in Cytology (SCT) certification as an approved board for individuals to meet the CLIA personnel qualifications at 42 CFR 493.1483

Background:
CMS, in collaboration with the Centers for Disease Control and Prevention (CDC), is approving the American Society for Clinical Pathology (ASCP) Board of Certification (BOC) Specialist in Cytology (SCT) certification as an approved board for individuals to meet the CLIA personnel qualifications at 42 CFR 493.1483. As stated in the CLIA regulations, individuals who perform testing in the subspecialty of cytology must hold an earned degree from a school of cytotechnology accredited by an organization approved by HHS1 or be certified in cytotechnology by a certifying agency approved by HHS, as long as they possess a current license as a cytotechnologist issued by the State in which the laboratory is located, if such licensing is required.

Currently, the only approved board for cytotechnologists is the ASCP BOC Cytology (CT) for individuals who have earned a Bachelor of Science. Additionally, individuals who are qualified as cytotechnologists may also serve as general supervisors in the subspecialty of cytotechnology.

1 42 CFR 493.1483(b)(1) currently refers to the Committee on Allied Health Education and Accreditation (CAHEA), which no longer exists. The final rule, CMS-3326-F, “CLIA Fees; Histocompatibility, Personnel, and Alternative Sanctions for Certificate of Waiver Laboratories” replaces the reference to CAHEA with the Commission on Accreditation of Allied Health Education Programs, effective December 28, 2024.
**Discussion:**
State Agencies may accept board certification from individuals who passed the ASCP BOC SCT certification.

**Contact:**
For questions or concerns relating to this memorandum, please contact LabExcellence@cms.hhs.gov.

**Effective Date:**
Immediately. Please communicate to all appropriate staff within 30 days.

/s/
David R. Wright
Director, Quality, Safety & Oversight Group

**Resources to Improve Quality of Care:**
Check out CMS’s new Quality in Focus interactive video series. The series of 10–15 minute videos are tailored to provider types and aim to reduce the deficiencies most commonly cited during the CMS survey process, like infection control and accident prevention. Reducing these common deficiencies increases the quality of care for people with Medicare and Medicaid. Learn to:
- Understand surveyor evaluation criteria
- Recognize deficiencies
- Incorporate solutions into your facility’s standards of care
See the Quality, Safety, & Education Portal Training Catalog, and select Quality in Focus.