



Association for Molecular Pathology

Promoting Clinical Practice, Basic Research, and Education in Molecular Pathology

9650 Rockville Pike, Bethesda, Maryland 20814

June 28, 2010

Steven Teutsch, MD, MPH, SACGHS Chair
Office of Biotechnology Activities
National Institutes of Health
6705 Rockledge Drive, Suite 750
Bethesda, MD, 20892

RE: Comments of the Association for Molecular Pathology on the Draft Report of the Secretary's Advisory Committee on Genetics, Health, and Society on Genetics Education and Training of Health Care Professionals, Public Health Providers, and Consumers

Dear Dr. Teutsch:

The Association for Molecular Pathology (AMP) commends the Secretary's Advisory Committee for recognizing the importance of professional and public education and training in genetics and addressing needs in this area.

AMP is a professional organization of pathologists and laboratory professionals dedicated to providing molecular diagnostic testing in the areas of genetics, solid tumors, hematopathology, and infectious diseases. One of the missions of AMP is to enhance training and education in molecular pathology including molecular genetics. The AMP Training & Education Committee oversees and implements education, training programs and certifications in molecular pathology, mentors trainees, and provides oversight of public and professional education initiatives. AMP offers a number of continuing education programs for health professionals in genetics and genomics, including the AMP annual scientific meeting, outreach courses to health professionals, and online webinars geared to health professionals.

Although overall the draft document is well considered, it seems to overlook the contribution of pathologists and non-physician laboratory directors as providers of health care in genetics and in genetic training and education. Molecular pathology professionals who perform and interpret genetic tests play a key role in this arena by providing access to genetic testing, advancement of genetic knowledge, development of test technologies, and education of clinicians and consumers in the best use and interpretation of genetic tests. Neither AMP nor other pathology or laboratory organizations were included in the list of health care professional organizations surveyed for the draft report, nor is this essential group of health care professionals listed as a key provider of genetic services or of genetic education.

There are several postdoctoral training programs for genetic laboratory professionals that are not included in the SACGHS report. The American Board of Medical Genetics (ABMG) not only certifies medical geneticists (mentioned on page 11/12 of the draft document), but also offers certifications in four areas of laboratory genetics, specifically: Clinical Molecular Genetics (CMG), Clinical Cytogenetics, Clinical Biochemical Genetics, and Molecular Genetic Pathology (MGP)(of note MGP is jointly certified by ABMG and the American Board of Pathology). AMP works directly with fellows in the MGP and CMG training programs. We respectfully suggest that the role of pathologists and laboratorians as health care providers of

genetic testing and our contribution to genetic education of clinicians and patients should be included in the SACGHS document.

AMP agrees overall with the recommendations of SACGHS to improve education and training in genetics. We would like to highlight the first and last recommendations as we feel they are critical to insure appropriate access to and utilization of genetic tests.. The first recommendation: to “identify innovative education and training approaches that will promote integration of genetics and genomics into clinical care” by convening a workshop “including representatives of health professional organizations engaged in accreditation, certification, and continuing education efforts” should include representatives of AMP. The last recommendation: “to ensure adequate reimbursement for genetic and genomic services such as interpretation of genetic tests” ideally would specifically address current issues in reimbursement for performance and interpretation of genetic tests by qualified laboratory professionals.

In summary, specific recommendations of the AMP to amend the SACGHS report are listed below:

1. Include AMP in the list of health care professional organizations involved in providing point of care genetics and vested in education and training of genetics professionals
2. Include pathologists and qualified non-physician laboratory professionals as health care providers with genetics expertise
 - a. On page 1 of the SACGHS report Preface, the list of point-of-care health professionals with expertise in genetics should include pathologists and qualified non-physician laboratory professionals.
 - b. On page 9 of the SACGHS report, the description of the Genetic Professional Workforce should include pathologists and qualified non-physician laboratory professionals involved in genetic testing.
3. On page 11 of the SACGHS report, include a list or discussion of current genetics training programs for health professionals in genetic laboratory testing, including Molecular Genetic Pathology (ABMG/ABP), Clinical Molecular Genetics, Clinical Cytogenetics, and Clinical Biochemical Genetics (**ABMG**).
4. Include representatives of AMP in workshops and discussions to identify innovative education and training approaches that will promote integration of genetics and genomics into clinical care (recommendation #1 of the draft report).
5. Specify that there is a need to ensure adequate reimbursement for genetic testing and for interpretation of genetic test results by pathologists and qualified non-physician laboratory professionals in (recommendation #7 of the draft report).

AMP would like to thank the SACGHS for the time and effort that went into writing the draft report and for considering our comments. We look forward to working with the SACGHS, the Department of Health and Human Services, and others to improve education and training in genetics.

Sincerely,



Karen Mann, MD, PhD
President



Karen Weck, MD
Chair, Training & Education Committee