



October 18, 2018

The Honorable Erik Paulsen
127 Cannon House Office Building
Washington, DC 20510

Sent electronically to: andy.franke@mail.house.gov

Re: CMS Recognition of Genetic Counselors

Dear Representative Paulsen:

On behalf of the American College of Medical Genetics and Genomics (ACMG), I want to thank you for the opportunity to meet with your office on October 2, 2018. ACMG is the only nationally recognized professional membership organization dedicated to improving health through the practice of medical genetics and genomics. Our membership includes over 2000 genetics professionals, nearly 80% of whom are board certified clinical and laboratory geneticists and genetic counselors.

ACMG is aware that your office is preparing legislation that would allow the Centers for Medicare and Medicaid Services (CMS) to recognize genetic counselors as healthcare providers and reimburse them for genetic counseling services provided to Medicare beneficiaries. We appreciate your interest in medical genetics and generally support recognition and reimbursement of genetic counselors within an appropriate scope of practice. With the rapid increase in knowledge about the relationships between genetics and diseases that has developed over the past couple decades, the range of genetic services that are being provided to patients and to the public has greatly expanded. Moreover, these services have become increasingly more complex and require a unique combination of counseling skills and medical knowledge. Genetic services are provided by various types of health professionals, and genetic counselors have played and will continue to play a crucial role in the provision of these services. Increasing patient access to genetic services such as genetic counseling is vital.

Genetic counselors receive specialized training in medical genetics and patient counseling through a master's level program and are typically certified by the American Board of Genetic Counseling. They help patients understand how genetic conditions may affect them and their families, how to make informed healthcare decisions, understand what genetic test results may or may not reveal, and they support the emotional needs of their patients. Genetic counselors also fill the critical need of

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7101 Wisconsin Avenue
Suite 1101, Bethesda, MD 20814
Telephone 301-718-9603
Fax 301-718-9604
www.acmg.net

obtaining detailed family histories that can be used to help establish risk and, together with the physician's medical evaluation, inform what tests may need to be ordered. Ordering of genetic tests, however, should not be done without considering results of the medical evaluation which is performed by a licensed physician. Failure to consider all necessary medical information prior to ordering genetic tests will result in unnecessary testing and increased costs to the patient and healthcare system.

Establishing a clinical diagnosis for a patient, medical management of a patient, medical treatment of a patient, and ordering medical tests (including genetic tests) are practice of medicine and are therefore outside the scope of practice of a genetic counselor. While ACMG supports direct reimbursement of genetic counselors, we cannot support legislation that permits genetic counselors to engage in the practice of medicine. Similarly, we cannot support legislation that excludes American Board of Medical Genetics and Genomics (ABMGG)-certified Ph.D. and M.D. geneticists from providing genetic counseling services. These geneticists are trained in one or more of the six doctoral-level specialties of Medical Genetics and Genomics (Laboratory Directors of Clinical Molecular Genetics, Clinical Biochemical Genetics, Clinical Cytogenetics, and Laboratory Genetics and Genomics or MD Clinical Genetics physicians and PhD Medical Geneticists) and are qualified to provide genetic counseling services. Additional information about scope of practice for medical genetics professionals is described in the attached ACMG Board of Directors [statement](#).

ACMG looks forward to the introduction of legislation that will allow CMS to recognize genetic counselors as healthcare providers and reimburse them for their counseling services to Medicare beneficiaries. With the increase in knowledge about the relationships between genetics and disease, access to genetic counselors for Medicare beneficiaries is crucial. We are optimistic that the legislation will be introduced with an appropriate scope of practice so that this important bill may be supported by ACMG and the broader medical community. We appreciate your interest in medical genetics and look forward to engaging with your office in the future. For additional questions, please contact Michelle McClure, Public Policy Director, at mmcclure@acmg.net.

Sincerely,

A handwritten signature in black ink that reads "Michael S. Watson". The signature is written in a cursive style with a large initial "M".

Michael S. Watson, MS, PhD, FACMG
Executive Director