



October 12, 2018

The Honorable Mark Mustio  
Professional Licensure Committee Chair  
Pennsylvania House of Representatives

The Honorable Harry Readshaw  
Professional Licensure Committee Democratic Chair  
Pennsylvania House of Representatives

Sent electronically to: [mmustio@pahousegop.com](mailto:mmustio@pahousegop.com); [DemProLicensureStaff@pahouse.net](mailto:DemProLicensureStaff@pahouse.net)

**Re: House Bills 2618 and 2619**

Dear Representatives Mustio and Readshaw:

I write on behalf of the American College of Medical Genetics and Genomics (ACMG). ACMG is composed of over 2,000 members, of whom nearly 1300 are diplomats certified in medical genetics by the American Board of Medical Genetics and Genomics (ABMG). The professional expertise and responsibilities of the diplomats are in the clinical and laboratory aspects of providing medical genetic services. ACMG is generally supportive of legislation providing for licensure of trained genetic counselors. However, certain bills contain language that, for reasons of patient safety, the ACMG cannot support.

With the rapid increase in knowledge about the relationships between genetics and diseases that has developed over the past 10-20 years, 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 medical knowledge and counseling skills. 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. We believe that licensure enhances the ability of genetic counselors to provide appropriate genetic counseling services to those who need them. Furthermore, licensure helps protect the public from the harms that would ensue from inaccurate and inappropriate counseling that could be provided by inadequately trained individuals holding themselves out to the public as genetic counselors. However, the scope of practice for a board-certified genetic counselor does not include the practice of medicine.

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Pennsylvania House Bills 2618 and 2619 are intended to modify the existing language in the Medical Practice Act and Osteopathic Medical Practice Act by expanding the genetic counselor scope of practice to include ordering of genetic tests. Similar bills have also been introduced in the Senate (Senate Bills 1074 and 1169). Ordering of genetic tests is the practice of medicine, and the scope of practice for a board-certified genetic counselor does not include the practice of medicine. Accordingly, the ACMG believes that the current genetic counselor licensure legislation should not be modified to include ordering of genetic tests.

We do want to point out, however, that individuals trained in one or more of the six doctoral-level specialties of Medical Genetics and Genomics, and board certified by the American Board of Medical Genetics and Genomics (ABMGG) (MD and PhD 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), are qualified to provide genetic counseling services. No genetic counselor licensure legislation should be written in such a way that it prohibits ABMGG-certified PhDs, as well as MDs, from providing genetic counseling services.

The ACMG hopes that the Professional Licensure Committee will take this information into consideration as you consider House Bills 2618 and 2619. ACMG is available to further discuss these concerns or to provide technical assistance in refining legislative language if needed.

Sincerely,

A handwritten signature in black ink that reads "Michael S. Watson". The signature is written in a cursive, slightly slanted style.

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