

## BACKGROUND ON THE CMS NURSING DEGREE POLICY

In January 2018, the Centers for Medicare & Medicaid Services (CMS) published a [Request for Information](#) (RFI) outlining its interest in receiving input from stakeholders on the regulations governing the [Clinical Laboratory Improvement Amendments of 1988 \(CLIA\)](#). CMS indicated it was interested in receiving [your input](#) on the CLIA regulations pertaining to personnel, including CMS' interest in allowing individuals with a bachelor's degree in nursing to perform high complexity testing and to serve as a technical consultant in a moderate complexity laboratory.

The RFI is intended to formalize a CMS policy, outlined in an [April 1, 2016 memorandum](#), in which CMS stated its belief that a bachelor's degree in nursing is equivalent to a bachelor's degree in biology for purposes of meeting the CLIA high complexity academic degree requirements. The ASCP Board of Certification (BOC) and 8 of its collaborating professional societies [wrote](#) CMS in June, 2016 opposing the Agency's position. In September 2016, the American Society for Clinical Laboratory Science (ASCLS), the American Society for Clinical Pathology (ASCP), and the ASCP BOC met with the Agency to urge the Agency to reverse its policy. Click [here](#) for an update on that meeting. ASCLS, ASCP, and the ASCP BOC subsequently sent a [letter](#) to CMS challenging the Agency's policy.

The ASCP BOC is currently developing formal comments regarding the Agency's nursing degree. We will share these comments with the community once they have been sent to CMS. In addition, ASCP is working with the BOC's sponsoring societies and the broader laboratory community via an Action Alert to raise awareness about the RFI.