

From: [Renee Smiddy](#)
To: [BPL-BoardSupport](#)
Cc: [Adam Carlson](#); [Fults, Paige \(LARA\)](#); [MacIntosh, Weston \(LARA\)](#)
Subject: MHA Comments on Genetic Counseling - General Rules 2021-43 LR
Date: Thursday, May 26, 2022 1:29:14 PM
Attachments: [MHA Comments Genetic Counseling - General Rules.pdf](#)

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Good afternoon,

Please see the MHA's comments regarding the draft administrative rules for Genetic Counseling – General Rules 2021-43 LR.

Please let me know if you have any questions or comments.

Kind regards,

Renée Smiddy, MSBA | Senior Director, Policy
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May 26, 2022

Department of Licensing and Regulatory Affairs
Bureau of Professional Licensing
Boards and Committees Section
Genetic Counseling – General Rules
2021-43 LR

Attention: Departmental Specialist
611 W. Ottawa St.
P.O. Box 30670
Lansing, MI 48909
BPL-BoardSupport@michigan.gov

Dear Department Specialist:

On behalf of Michigan hospitals, the Michigan Health & Hospital Association (MHA) appreciates the opportunity to provide comments on the Genetic Counseling – General Rules.

The MHA supports the Department in establishing genetic counselor licensure to align with the majority of states implementing professional standards for practitioners providing genetics and genomics to improve healthcare for Michigan patients.

The genetic counseling draft rules require licensing applicants to be in good standing with the American Board of Genetic Counseling (ABGC) or the American Board of Medical Genetics and Genomics (ABMGG). **The MHA requests the Department grant temporary licensing to practitioners who have been providing genetic counseling services for 3 years prior to the rule's effective date, as they work to satisfy the educational requirements demanded by the ABGC and ABMGG to be in good standing.** These practitioners have been providing high-quality genetic counseling within their hospitals and have the endorsement of hospital leadership to continue providing services as they work to satisfy the new licensure requirements.

The MHA is concerned that nurse practitioners who have been trained to provide genetic counseling services will have to cease providing care because of the limited educational programs available in Michigan to satisfy the ABGC or ABMGG educational requirements. Michigan only has two accredited genetic counseling programs at the University of Michigan and Wayne State University. Both programs require students to be onsite and the University of Michigan accepts approximately 10 students per class, and Wayne State University accepts 8 students per class. **The MHA asks the department to allow hospitals and health systems to endorse these practitioners to have temporary licenses and allow for extra time to identify alternative educational programs that would allow these practitioners to obtain active candidate status from the ABGC or the ABMGG.**

Brian Peters, Chief Executive Officer

Please contact me at rsmiddy@mha.org if you have any questions regarding these comments or if you need additional information.

Respectfully submitted,

A handwritten signature in black ink that reads "Renée Smiddy". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

Renée Smiddy
Senior Director, Policy