March 20, 2020

The National Society of Genetic Counselors (NSGC) requests a Section 1135 waiver for certified genetic counselors that serve Medicare and Medicaid beneficiaries around the country.

Genetic counseling clinics across the country are moving to remote services as hospitals prepare for the COVID-19 surge. However, genetic services to Medicare and Medicaid beneficiaries are encountering significant barriers, even with federal government efforts to promote access through telemedicine, because these efforts do not currently apply to genetic counselors. Previously used models of "incident to" delivery are no longer viable, and Medicare and Medicaid beneficiaries facing new cancer and cardiac diagnoses are at risk of inappropriate testing or worse, inappropriate care.

The current loosening of telehealth regulations could be vital to delivering genetic counseling services for many patients who need genetic services where timing and treatment options are of the essence, and minimizing time spent in public areas which is particularly important. Current loosening of telehealth regulations do not increase access to genetic counselor services because genetic counselors are not recognized by CMS. We hope Congress will act to recognize genetic counselors under the Social Security Act by enacting H.R. 3235. In the meantime, to avoid disruption of needed genetic services, we request that CMS waive the “incident to” requirement for genetic counselors, and allow certified genetic counselors to provide remote services by phone to Medicare and Medicaid beneficiaries. We request a blanket waiver, to avoid the 5,000 CGCs around the country from having to apply as individuals.

What happens when genetic counselors are not available?

- Physicians who rely on genetic counselors to order correct testing may flounder and evidence demonstrates 30% of testing will be inaccurate.
- Patients will not receive comprehensive information about their risk for disease.
- Timely surgical and/or therapeutic treatment decisions may be delayed or misinformed by lack of or inappropriate genetic test ordering.

If you have any questions, please contact John Richardson, NSGC Director of Government Relations, at 202-640-8384.

Sincerely,

Gillian Hooker, PhD, ScM, LCGC
President