

February 14, 2019

To: Katherine Ceroalo  
New York Dept. of Health  
Bureau of Program Counsel  
Regulatory Affairs Unit  
Room 2438  
ESP Tower Building  
Albany, New York 12237

Dear Ms. Ceroalo:

The American Board of Bioanalysis (ABB) submits the following comments regarding proposed rule I.D. No. HLT-51-18-00017-P to recognize additional boards for clinical laboratory directors seeking to obtain a New York certificate of qualification.

We thank the New York Department of Health for proposing to recognize ABB's high-complexity clinical laboratory director certifications and for the opportunity to comment on this proposal.

The American Board of Bioanalysis (ABB), founded in 1968, is a nationally recognized certifying board for high-complexity clinical laboratory directors and is one of the four "legacy" boards recognized in the first CLIA regulations (CLIA '67, published in 1974). ABB's director certifications, in addition to being recognized by the CLIA program since 1974, are recognized in all states that license clinical laboratory directors, except New York.

ABB is also the only nationally recognized certifying board that certifies andrologists and embryologists. ABB also developed a CLIA-approved director level certification, with the assistance of the Association of Public Health Laboratories (APHL), for public health microbiologists.

ABB appreciates, and supports, the New York Department of Health's proposed recognition of ABB's high complexity director certifications. ABB offers the following comments not as criticism, but for clarification and to offer ideas for improving/modifying the proposal:

1. The Summary of Express Terms mentions that Section 19.2 is amended to recognize "additional accrediting boards." Section 19.1(d) defines accreditation as being conferred on "schools, institutions or programs," not individuals.

We recommend revising the reference to Section 19.2 in the Summary of Express Terms as recognizing "additional certifying boards" instead of "accrediting" boards, as certification usually applies to individuals, not schools, institutions, or programs.

2. The proposal recognizes ABB's High-complexity Clinical Laboratory Director (HCLD) certification [(section 19.2(A)(d)(1)]. ABB has several categories of high-complexity laboratory director certification, including:

**a) Bioanalyst Clinical Laboratory Director (BCLD)**

A BCLD is a generalist who must demonstrate technical expertise in a minimum of three of the following technical disciplines:

1. Chemistry
2. Diagnostic Immunology
3. Hematology
4. Microbiology or Public Health Microbiology
5. Molecular Diagnostics

**b) High-complexity Clinical Laboratory Director (HCLD)**

A laboratory director who has expertise in high complexity testing in at least one (1) of the following clinical laboratory disciplines or specialties:

1. Andrology
2. Chemistry (including urinalysis, endocrinology and toxicology)
3. Diagnostic Immunology
4. Embryology
5. Hematology (including flow cytometry)
6. Microbiology (includes bacteriology, parasitology, virology, and mycology)
7. Molecular Diagnostics
8. Public Health Microbiology

**c) Public Health Laboratory Director (PHLD)**

A laboratory director who has expertise in high complexity testing in Public Health Microbiology

**d) Embryology Laboratory Director (ELD)**

A laboratory director who has expertise in the specialty of assisted reproductive technology (ART) laboratory procedures in an embryology laboratory

**e) Andrology Laboratory Director (ALD)**

A laboratory director who has expertise in the technical discipline of andrology

We suggest that the proposal make clear that ABB's BCLD, HCLD, and PHLD certifications are recognized. All of these certifications are for high-complexity laboratory directors.

For your information, the Association of Public Health Laboratories (APHL) collaborated with ABB in developing ABB's Public Health Laboratory Director (PHLD) certification, which is recognized by the federal CLIA program, and ABB worked with the American Society for Reproductive Medicine (ASRM), the College of American Pathologists (CAP), and The Joint Commission in developing the ELD and ALD director certifications. In addition, ABB is working with the Association of Medical Laboratory Immunologists (AMLI) to maintain and improve ABB's HCLD director certification examination in Immunology following the discontinuation of the American Board of Medical Laboratory Immunology's (ABMLI's) certification examination in 2017.

3. Section 19.2(A)(d)(1) recognizes ABB for its HCLD, but also requires that the "applicant has obtained a minimum of four years of post-doctoral experience equivalent to paragraph (2) of this subdivision." Under CLIA and other state regulations, there are no requirements that a director's training and/or experience be earned subsequent to receiving an earned doctoral degree.

Furthermore, the Department's "Rule Making Activities," published in the *New York State Register* on December 19, 2018, states (p. 30):

"certain boards mandate the appropriate educational requirement of a doctoral degree, but do not specify that the candidate for the board demonstrate the required four years of post-doctoral experience. Therefore, language clarifying the post-doctoral degree experience required by the Department has been proposed for these boards (American Board of Bioanalysis High-complexity Clinical Laboratory Director and the National Registry of Clinical Chemists) to ensure that the requirements for all applicants are consistent."

Based on this, it is clear that the New York Department of Health requires "four years of post-doctoral experience" and that the Department believes this requirement should be consistent for all applicants.

However, the American Board of Medical Microbiology (ABMM) has several qualifying routes for laboratory directors, one of which requires three years (not four years) post-doctoral experience (Plan I) and one requiring only two years of post-doctoral training/experience (not four years) (Plan II). (Attachment 1)

Likewise, the American Board of Forensic Toxicology (ABFT) requires only 3 years post-doctoral experience for Fellows in Forensic Toxicology (Attachment 2).

Obviously, the ABMM and ABFT qualifying routes do not require four years of post-doctoral experience. As such, there is no consistency within the New York Department of Health's proposed rule to require four years of post-doctoral experience for all New York approved certifying boards for high-complexity clinical laboratory directors.

Since the requirement of four years of post-doctoral experience has not been consistently applied, even to currently recognized certifying boards, ABB suggests that the Department consider the following options:

1. Reduce the number of years of post-doctoral experience to two years (consistent with ABMM and ABFT requirements), or
2. Require a total of four years of clinical laboratory experience, not necessarily post-doctoral, two of which are supervising/directing high complexity testing and the other two at the medical technologist level, or higher.

ABB believes that the latter is the more appropriate approach.

The definition of post-doctoral experience in 19.1(n) includes "teaching experience directly related to a medical technology program, clinical laboratory sciences program, or a clinical laboratory section of a residency program..." As such, an individual could qualify for a New York director's Certificate of Qualification by earning a Ph.D. in basic research (say biochemistry), then teach biochemistry for four years (post-doctoral) **without ever having performed clinical laboratory testing or worked in a clinical laboratory**, pre-doctoral or post-doctoral, as there is no requirement that teaching requires having worked in a clinical laboratory (pre-doctoral or post-doctoral).

ABB believes that a minimum of four years of clinical laboratory experience is necessary (and ABB requires that at least two years of the four years of experience be at the supervising/directing level). ABB also recognizes that valuable experience can be gained as a clinical laboratory technologist or supervisor before earning a doctoral degree.

Nevertheless, New York's post-doctoral experience requirement raises the issue of how a newly minted Ph.D. in a clinical laboratory science can obtain four years of clinical laboratory experience in New York. Under the proposed rule, after an individual earns a doctoral degree, he/she must then work as a non-director for four years. But to do so in a New York clinical laboratory requires that the individual be licensed as a clinical laboratory technologist, technician, or supervisor in order to perform or supervise (but **not** direct the laboratory, as the individual does not yet have a New York director's Certificate of Qualification).

If a doctoral degreed individual has not been trained as a medical technologist, he/she may find it extremely difficult to qualify for a New York technologist license. It would appear then that the most expedient way to gain that experience is to relocate from New York to one of the 38 states where a CLIA-qualified individual can work in a clinical laboratory without a medical technologist or laboratory supervisor license. Another alternative is to teach for four years (perhaps without ever having worked in a clinical laboratory).

On the other hand, if the individual is already a licensed technologist with more than four years of experience (of which at least two are as a supervisor), he/she must continue to work as a technologist or supervisor for four more years. Such an individual will **not** see the benefit of working for four more years as a technologist or supervisor, and may prefer to relocate to one of the 38 states where he/she could immediately work, and be paid, as a director. This is a powerful incentive to leave New York and to direct a laboratory in another state.

ABB urges the Department to eliminate the requirement that ABB certified applicants obtain a minimum of four years **post-doctoral** experience as set forth in paragraph 2 of Section 19.2(A)(d)(1), and instead require four years of clinical laboratory experience for **all** New York approved certifying boards, of which at least two years are at the supervisory level and the remainder at the medical technologist, or higher, level. Having a clearly defined pathway for doctoral degreed individuals to gain the required experience by working in New York, or by accepting at least some experience gained prior to earning a doctoral degree, will encourage laboratory director candidates to stay in New York.

In the event the Department does not accept this recommendation, then the New York Department of Health will determine whether an individual's post-doctoral experience is acceptable. That being the case, ABB requests that the New York Department of Health specify the criteria it will use to determine the acceptability of that experience, and identify who, within the Department, will determine the acceptability of that experience.

4. Section 19.1(b) defines an "assistant director" as "a director who has been designated by the owner(s) of the laboratory as having shared responsibility with a director..." The Department should explain what "shared responsibility" entails, and how that relates to CLIA's requirement that only one individual be the laboratory director.

#### Reproductive/Fertility Testing

ABB is the only nationally recognized board that certifies directors and supervisors in the disciplines of andrology (male fertility/reproduction) and embryology (female fertility/reproduction).

These two disciplines have a confusing and complicated regulatory history that continues today. Andrology testing that is performed strictly to assess male fertility/infertility (e.g. sperm count, sperm motility) and **not** as part of an assisted reproductive technology procedure is covered by CLIA. Because the CLIA regulations do not include a specialty, or sub-specialty, for andrology, andrology testing is assigned to the specialty of hematology. This creates a regulatory challenge, as most andrologists are not hematologists, and most hematologists are not andrologists. Likewise, the New York Department of Health does not issue a director's Certificate of Qualification [Section 19.3(d)] in the category/specialty of andrology, but the Department is authorized to designate "other specific categories, procedures, or specialties."

ABB urges the Department to establish a category/specialty for CLIA-covered andrology procedures, and to utilize ABB's director-level certification in andrology as a qualification for a director's Certificate of Qualification in the category/specialty of andrology.

Embryology, on the other hand, is not regulated under CLIA but is regulated under New York's Reproductive Tissue Bank regulations (Subpart 52-8).

The qualifications for the director of a tissue bank are contained in Section 52-2.5(a)(2). These regulations are vague, and require only a doctoral, master's, or bachelor's degree "in an appropriate biological science" and two, four, or six years of experience, respectively. And for those with a doctoral degree, the experience does not have to be post-doctoral.

The two private accrediting agencies for embryology laboratories, CAP and The Joint Commission, require that the embryology laboratory director have an earned doctoral degree [except for those grandfathered] and be certified at the director level by ABB or an equivalent board. The ABB certification requirement also applies to physicians (including reproductive endocrinologists) who wish to direct a CAP or Joint Commission accredited embryology laboratory.

ABB recommends that the Department require ABB director-level certification in Embryology for directors of Reproductive Tissue Banks.

Once again, ABB thanks the New York Department of Health for proposing to recognize ABB's high-complexity clinical laboratory director certifications and appreciates the opportunity to comment on the proposal. We are available and willing to answer questions or provide additional information to the Department as it finalizes the proposal.

Sincerely yours,



Mark S. Birenbaum, Ph.D.  
Administrator

MSB:th

cc: ABB

# Eligibility Requirements

The ABMM Board uses the following criteria to evaluate your application to sit for the exam. If you fail to meet these criteria, your application will be denied and your application fee will not be refunded.

You must meet the criteria in one of the plans below to apply and sit in for the ABMM exam:

**PLAN I:** Applicants must possess a doctorate and complete a minimum of **three years of experience**, as defined below.

**PLAN II:** Applicants must possess a doctorate and complete **two years of postgraduate training in a CPEP-approved program**, as defined below.

**PLAN III:** Applicants must possess a doctorate and complete an internal medicine/infectious disease fellowship or AP/CP residency, in addition to:

- i. one year of a microbiology fellowship approved by the American Board of Pathology (ABP) or
- ii. completion of a Royal College of Physicians and Surgeons of Canada three-year medical microbiology/infectious disease or five-year medical microbiology residency, as defined below.

**All training and experience requirements must be met after the doctoral degree has been awarded.**

## EDUCATION

Applicants must possess a Doctorate of Philosophy or Doctorate of Science in microbiology or an equivalent degree in one of the related sciences acceptable to the ABMM Board. Other degrees (such as Doctor of Medicine, Doctor of Osteopathy, Doctor of Veterinary Medicine, Doctor of Public Health, Doctor of Dental Medicine or Doctor of Dental Surgery) may be accepted if your additional special training and experience is approved by the ABMM Board.

- Applicants educated in the U.S.
  - All educational requirements must be earned from institutions accredited by a regulatory agency recognized by the U.S. Department of Education.
- Applicants educated in Canada
  - All educational requirements must be earned from institutions recognized by the Ministry of Education of the province in which each school is located.
- Applicants educated outside the U.S. or Canada
  - Degrees must be deemed equivalent to those earned at an accredited institution in the U.S. by World Education Services, Inc.

## EXPERIENCE

Experience is defined as **full-time postdoctoral training and/or full-time director-level laboratory experience** which is directly relevant to the practice of medical and public health microbiology and its subspecialties. **Appropriate experience requires an ongoing relationship with a medical and public health microbiology, reference or other microbiology laboratory that includes a diagnostic service component such that the applicant has devoted at least 75% of his/her time to management, medical and administrative activities during the three years of experience.**

Specifically, the cumulative training and/or experience must include the following percentages of time devoted to each of the listed areas:

- Responsibilities and skills in the medical and public health microbiology laboratory (50-65%)  
Examples include:
  - Assisting medical and public health microbiology technologists in interpreting the medical significance of laboratory findings
  - Oversight of quality assurance/quality control
  - Technical troubleshooting and problem solving
- Interaction with healthcare providers (15-30%)  
Examples include:
  - Consultation with healthcare providers regarding the selection and interpretation of medical and public health microbiology tests/results
  - Consultation with local and state public health officials
  - Reference lab consultation with clients
  - Participation in hospital/institution committees (infection control, antibiotic subcommittee, etc.)
- Management and administrative skills (10-20%)  
Examples include:
  - Interacting with institutional and laboratory administration and personnel
  - Performing financial analyses on new test methods or laboratory programs
  - Assuring/overseeing accreditation, competency, proficiency testing, etc.
- Research (0-25%)  
Examples include:
  - Development/evaluation of new test methods/techniques/instrumentation
  - Collaboration with medical and public health microbiology/basic research colleagues
- Teaching (0-25%)  
Examples include:
  - Didactic lectures and rounds
  - Resident/fellow/student training

The minimum percentages in each area must be met. Research and teaching experience are not required, but applicants may have up to 25% of their time devoted to either, or a combination, of those areas provided the combination does not exceed 25%. Experience in which more than 25% of time is spent on research, teaching, grant writing or test development does not satisfy the experience requirement.

Applicants who will complete the requisite training and experience within 60 days following the exam date are eligible to apply.

#### **NON-CPEP RESIDENCIES**

- An infectious disease (ID) fellowship may count towards the requisite experience if it meets the eligibility outlined above. Despite the length of fellowship, no more than one year's experience will count towards meeting the three years of required experience. Experience must involve an active role in the laboratory (e.g., attended rounds and completed a microbiology rotation) and must be documented by a reference form submitted by the director of microbiology.



- A pathology residency, devoted to microbiology and molecular pathology, may count towards the requisite experience if it meets the eligibility outlined above. No more than six month's experience will count towards meeting the three years of required experience. The number of months devoted to microbiology and molecular pathology during the residency must be specifically documented on the reference form.
- Residents of the Royal College of Physicians and Surgeons of Canada three-year medical microbiology/infectious disease or five-year medical microbiology can apply for eligibility once their residency is completed. Due to the timetable of the program, residents will not be found eligible before the program is completed. Those who will complete the program within 60 days following the exam date are eligible to apply.

# Exam Information

The ABMM exam is offered once a year in June, at testing centers located around the world.

## OBJECTIVE

To measure the applicant's knowledge in the four subject areas considered necessary for the effective practice of medical and public health microbiology:

1. Directing Laboratory Testing Functions
2. Directing Laboratory Administrative Functions
3. Ensuring Safety and Security in the Laboratory
4. Consulting with Other Medical and Public Health Microbiology Professionals

Responsibilities and roster of the Exam Development Subcommittees.

## EXAM FORMAT

The computer-based exam consists of 200 multiple-choice questions with only one correct answer.

Candidates can move forward and back through the questions while examining and are allowed six hours to complete the exam.

## ON EXAM DAY

Please plan to arrive at the testing center no more than 15 minutes prior to your scheduled exam time. The check-in process should only take five minutes.

You must bring the following with you to the testing center:

- *Your Test Taker Authorization Code.* The proctor cannot launch the test without this code. This code will be included in the confirmation email you are sent when you register for the exam.
- *Two forms of identification, one must be a current, government-issued, photo ID such as:*
  - State-issued driver's license or identification card
  - Passport
  - Military identification
  - National identification card
- The other can be a non-photo identification such as:
  - Credit card
  - Check cashing card
  - Bank debit card
  - Student ID from an accredited school
  - Both forms of identification can be a government-issued photo ID.

NOTE: Both forms of ID must show your name exactly as it appears in your Webassessor profile.

## RESPONSIBILITIES AND ROSTER OF SUBCOMMITTEES

### ABMM Exam Development Subcommittee (EDS)

The primary responsibility of the EDS is overseeing the development of all examination questions. The Subcommittee--

## CERTIFICATIONS

# American Board of Medical Microbiology

## American Board of Medical Microbiology Certification

The American Board of Medical Microbiology (ABMM) exam certifies doctoral-level microbiologists to direct medical and public health microbiology laboratories. ABMM certification is recognized by federal and state governmental agencies as a significant component toward meeting licensure requirements to direct laboratories engaged in the microbiological diagnosis of human disease.

The ABMM is recognized under the Clinical Laboratory Improvement Amendments of 1988 final rule and in all 12 states that require licensure: California, Florida, Georgia, Hawaii, Louisiana, Montana, Nevada, New York, North Dakota, Rhode Island, Tennessee and West Virginia.

### Eligibility

Doctoral-level microbiologists with at least ONE of the following:

- three years of experience, as defined in the PDF below.
- two years of CPEP training
- an internal medicine/infectious disease fellowship or AP/CP residency, in addition to:
  - one year of an American Board of Pathology (ABP) fellowship or
  - completion of a Royal College of Physicians and Surgeons of Canada three-year medical microbiology/infectious disease or five-year medical microbiology residency.

### Apply for Certification

[Apply](#)

### Deadline

April 1

### Application Fee

\$450.00

### Recertification

Diplomates must recertify every three years by completing application form documenting 150 contact hours of continuing education. The fee is \$300 for ASM contributing and premium members and \$275

Additional training and experience requirements must be met after the doctoral degree has been awarded.

Application Deadline: April 1

Application Fees: \$450 for ASM members and \$575 for non-members

## Exam Information

Exam Period: June 1-June 30

Scores Published: September 1

Learn more information about the ABMM exam, including study resources and FAQs.

## Verify ABMM Diplomates

If you are interested in verifying the certification of an ABMM Diplomate, email your request to [certification@asmusa.org](mailto:certification@asmusa.org) with an authorization of release form signed by the Diplomate.

## Contact Information

Sue Williams, [certification@asmusa.org](mailto:certification@asmusa.org)

for ASM supporting and non-members.

Recertification  
Form

## Antimicrobial Stewardship Program

The Society of Infectious Diseases Pharmacists offers the Antimicrobial Stewardship Program which is an innovative and intensive practice-based activity for pharmacists focusing on the pharmacist's role in the area of appropriate use of antimicrobial agents.

Program  
Information

Attend ASM Biothreats



AMERICAN  
SOCIETY FOR  
MICROBIOLOGY

# American Board of Medical Microbiology (ABMM) Exam

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# AMERICAN BOARD OF FORENSIC TOXICOLOGY CERTIFICATION OVERVIEW

## GENERAL QUALIFICATIONS

Applicants must be persons of good moral character, high integrity, and good repute and must possess high ethical and professional standings.

## APPLICATION PROCEDURE

After submission to the ABFT Colorado Springs office, completed applications are reviewed by the Credentials Committee of the Board, and following successful completion of an examination, their recommendation is considered by the Board of Directors for final action. A completed application file will contain:

- Non-refundable application fee—\$250 USD (\$150 for Analyst).
- Recent passport-style photograph.
- Completed application form.
- Official transcripts from all colleges or universities attended (regardless of degrees received) must be sent directly to the Board's office by the registrar(s).
- Three professional character references from practitioners in Forensic Toxicology (other than members or individuals who sit on the ABFT Board of Directors) who are knowledgeable about the applicant's forensic toxicology experience and will complete ABFT-provided reference forms to be returned directly to the ABFT Administrative Offices. (Two references required for Analyst)

## EXAMINATION

- Applicants who meet the listed requirements will be admitted to the examination. The examination must be completed within a period of two years.
- Applicants must successfully pass the comprehensive written examination based on the principles and practice of forensic toxicology.
- Applicants who fail the examination may apply for re-examination once within one year for a \$150 examination sitting fee.

## CONTINUING EDUCATION AND ANNUAL FEES

- Once certified, all Certificants are required to provide annual documentation of continuing education in the field of forensic toxicology. Current documentation requirements are available on the ABFT website.
- An annual maintenance fee of \$100 is collected at the time continuing education documentation is submitted by the Certificant.
- The documentation and fee must be submitted every year, regardless of the amount or lack of continuing education activity that a Certificant has participated in for a given year.

## REQUALIFICATION

- The purpose of the Requalification process is to determine and document that a Certificant has maintained qualifications and continues an acceptable practice of forensic toxicology. Requalification is distinct from annual documentation of continuing education and occurs every five years. There is no fee associated with the requalification process.
- Certificants must submit continuing education information and fee for each of the years prior to Requalification. Requalification applications will not be processed unless all continuing education material has been submitted.
- Continuing education credit minimum totals for a first time requalification may be prorated relative to an individual's initial date of certification. Thereafter, a minimum total continuing education requirement for each full five-year period in consideration for requalification must be maintained.

Certification Categories						
	Fellow	Diplomate			Analyst	
		Forensic Toxicology	Forensic Alcohol Toxicology	Forensic Drug Toxicology		
Designation	F-ABFT	D-ABFT-FT	D-ABFT-FA	D-ABFT-FD	A-ABFT	
Education Degree <sup>1</sup>	Doctor of Philosophy or Science	Bachelor's	Bachelor's	Bachelor's	Bachelor's	Associate's
Training Pharmacology and Toxicology <sup>2</sup>	Formal coursework and/or documented training	Optional	Optional	Optional	Optional	Optional
Professional Experience Subsequent to Receipt of Degree <sup>3</sup>	three years	three years	three years	three years	one year	two years
Immediately Prior to Date of Application	one year	one year	one year	one year	one year	one year
Areas of Expertise	Forensic Toxicology (multidisciplinary) <sup>4</sup>	Forensic Toxicology (multidisciplinary)	Forensic Alcohol Toxicology	Forensic Toxicology Workplace/ Prescription Drug Monitoring	Analytical Toxicology/ Chemistry	

<sup>1</sup> Degrees must be obtained in biological or chemistry-related science (including pharmacy). Acceptable institutions are those accredited by regional accrediting commissions recognized by the United States Office of Education (USOE). Degrees awarded from institutions outside of the United States and Canada must be evaluated by a credentialing service accredited by the National Association of Credential Evaluation Services (NACES) such as the World Education Services (WES).

<sup>2</sup> All applicants must have adequate undergraduate and graduate (if applicable) education in biology and chemistry as determined by the Board. For Fellows, if transcripts do not reflect coursework in pharmacology or toxicology, details describing how such training was received are required. The Board reserves the right to request a letter from the individual(s) who provided such training.

<sup>3</sup> Applicants must have completed at least a specified time of full-time professional experience (or the part-time equivalent thereof) in forensic toxicology subsequent to receipt of their degree.

<sup>4</sup> Includes interpretation.

## BACKGROUND, FUNCTION, AND PURPOSE

The need to identify qualified forensic scientists who can provide essential professional services for the nation's judicial and executive branches of government has long been recognized. In response to the professional need, the American Board of Forensic Toxicology was organized in 1975 to provide, in the interest of the public and the advancement of the sciences, a certification program in forensic toxicology. On February 18, 2014, the American Board of Forensic Toxicology (ABFT) and the Forensic Toxicologist Certification Board (FTCB) merged into a single organization. In purpose, function, and organization, the ABFT is analogous to the certifying board in various medical specialties and scientific fields.

The objectives of the Board are to establish, enhance, and revise as necessary the standards of qualification for those who practice forensic toxicology and to certify as qualified scientists those voluntary applicants who comply with the requirements of the Board. In this way, the Board aims to establish a practical and equitable system of readily identifying those who possess the requisite qualifications and competence in forensic toxicology.

Certification is based upon the candidate's personal and professional record of education and training, experience, achievement, and a formal written examination.

The Board is a non-profit 501(c)(6) organization incorporated in the District of Columbia. It is recognized by the American Academy of Forensic Sciences, the Society of Forensic Toxicologists, the California Association of Toxicologists, the Canadian Society of Forensic Science, and the Southwestern Association of Toxicologists. The Board is composed of the officers and other directors, who serve staggered terms and are selected from the Certificants at large by a Nominating Committee process.

## GENERAL PROVISIONS

- The right to deny Certification is reserved.
- Certificates of Qualification in Forensic Toxicology are valid for five years and are renewable according to standards and under conditions established by the Board, including continuing education requirements.
- Persons holding a valid Certificate of Qualification issued by the Board are entitled to use the applicable designation and initials.
- Certificates may be suspended or revoked for appropriate cause under an elaborate system of safeguards for the individual concerned.
- Qualifications, requirements, and application procedures for certification are subject to revision by the Board. The latest version can be obtained online at [www.abft.org](http://www.abft.org) or from the Colorado Springs office.

For additional information, contact:

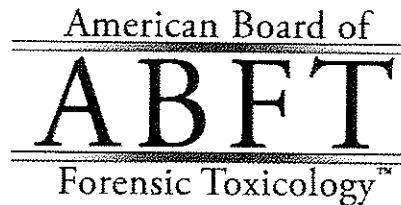
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## PROFESSIONAL CERTIFICATION

FELLOW IN FORENSIC TOXICOLOGY  
DIPLOMATE IN FORENSIC TOXICOLOGY  
DIPLOMATE IN FORENSIC ALCOHOL TOXICOLOGY  
DIPLOMATE IN FORENSIC DRUG TOXICOLOGY  
ANALYST IN FORENSIC TOXICOLOGY

An introduction to the nature and purposes of the Board with a summary of requirements for certification and application.

Complete details can be obtained from the ABFT website and application documents.

The American Board of Forensic Toxicology  
is accredited by the  
Forensic Specialties Accreditation Board

Certifying Forensic Toxicologists  
since 1975

[www.abft.org](http://www.abft.org)