

**From:** [DSPS CRED Med Bd Affiliates](#)  
**To:** [Hardin, Nilajah - DSPS](#)  
**Subject:** FW: Public Comment regarding the Draft of the emergency rules for Genetic Counselor Licensure  
**Date:** Wednesday, August 23, 2023 9:56:54 AM

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**From:** Ott, Amy <aott@mcw.edu>  
**Sent:** Monday, August 21, 2023 12:11 PM  
**To:** DSPS <DSPS@wisconsin.gov>  
**Subject:** Public Comment regarding the Draft of the emergency rules for Genetic Counselor Licensure

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Hello,

I am responding to the draft of the emergency rules by the Order of the Genetic Counselors Affiliated Credentialing Board. My understanding is that this draft is in public comment period, and that questions, comments or concerns should be submitted to this email address. If this is not the right email contact, please let me know.

I ask that the board consider an adjustment to the expiry date for temporary licensure. Specifically related to Gen Couns 2.02 Temporary Licensure (3) (b). This states that the temporary license expires 30 days after the results of the examination are issued by the American Board of Genetic Counseling (ABGC). There is no statement differentiating between passing or failing the ABGC exam. Therefore I interpret this as meaning, if someone fails the ABGC exam, they lose their temporary license 30 days after they get their results. Is that correct? If so, that is completely inappropriate. The ABGC allows individuals to take the exam again, and individuals with active candidate status have up to five years from the date of graduation to pass the exam.

If that statement is correct, then I suggest editing the rule under Gen Couns 2.02 Temporary Licensure (3)(b) to state:

30 days after **receiving a passing** result for the examination under s. 448.9704 (1) (d) 2 Stats. taken by the applicant have been issued by the American Board of Genetic Counseling.

If you accept this edit, it would mean:

- If someone passes the ABGC exam, they have 30 days from receipt of results to apply for full licensure.
- If someone fails the ABGC exam, their temporary license will expire on the date dictated by (3)(a) (which is one year from the date it was granted).

I kindly request that the Genetic Counselors Affiliated Credentialing Board consider this issue and edit.

Thank you for your time and consideration,

**Amy Ott, MS, CGC**

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