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FACT SHEET

Certified Genetic Counselors: Challenges and Opportunities

Executive Summary: Access to Genetic Counselors and Electronic Data Exchange
Improving electronic data exchange is essential to accelerating the use of Certified Genetic Counselors (CGCs). Secure, structured exchange of genetic laboratory results, family history, and risk data speeds clinical interpretation, lowers administrative burden, and improves care coordination. Enhanced interoperability of genetic data enables timely, accurate counseling and reduces downstream costs leading to a reduced likelihood of incomplete risk assessments and delayed care delivery. Improving access to CGCs through reimbursement reform, licensure alignment, and data standards will expand patient access, support precision medicine, and improve health outcomes.

WHAT IS THE ROLE & VALUE OF GENETIC COUNSELORS?

CGCs are advanced-degree professionals trained in medical genetics and counseling. CGCs guide patients and providers through the complexities of genetic testing by:

- Determining when and what testing is appropriate.
- Interpreting complex genomic results.
- Identifying at-risk relatives who may benefit from screening or surveillance.
- Addressing the medical, psychosocial, and familial implications of genetic testing.

CGCs may specialize in prenatal, pediatric, oncology, neurology, or other clinical areas. Their involvement may reduce unnecessary spending by ensuring correct tests are ordered and interpreted appropriately. Currently, CGCs provide reimbursable services only when billed under physicians, nurse practitioners, or physician assistants as Medicare does not recognize them as independent providers.

CURRENT CHALLENGES RELATED TO CGCs

Medicare Recognition

Currently, Medicare does not recognize CGCs as independent providers, contributing to:

- Reduced patient access to actionable genetic information
- Increased burden on practitioners
- Financial strain on health systems
- Delays in counseling and care coordination

Reimbursement

CGCs are unable to direct bill under Part B, contributing to challenges with:

- Reduced access for Medicare beneficiaries
- Additional administrative burden on physicians
- Increased costs for health systems

Access Limitations

Lack of Medicare recognition of CGCs contributes to:

- Extended times for patients awaiting genetic testing
- Inconsistent state licensure requirements
- Limited telehealth expansion
- Increased demand for genetic testing and precision medicine outpacing workforce capacity

Medicare recognition of CGCs under Part B at 85% of physician fee schedule, consistent with nurse practitioners and physician assistants, could help alleviate these challenges.

CPT & Billing Snapshot

Genetic counselors are not currently recognized as independent providers under CMS and cannot bill Medicare for their services. Other providers can bill for genetic counseling using Current Procedural Terminology (CPT) Evaluation and Management codes. The bipartisan “Access to Genetic Counselor Services Act of 2025” calls for the recognition of genetic counselors as providers and allowance for Medicare reimbursement at 85% of the rate of physicians.

CPT code 96041 is a time-based code for independent genetic counseling provided by genetic counselors (30 min each). While not covered by Medicare, coverage varies for commercial and state Medicaid plans. CPT code S0265 recognizes genetic counseling services provided together with a physician but is similarly limited in coverage due to lack of CMS recognition.

Access to Genetic Counseling Service Act of 2025 (H.R. 6280 and S. 3607)

Reintroduced in the 119th Congress in both the House and Senate with bipartisan support, the legislation seeks to improve access for older adults and high-risk patient groups, such as patients with hereditary risk related to oncology, cardiology, or rare diseases. It also seeks to reduce Medicare spending by supporting appropriate test utilization and avoiding unnecessary procedures. The legislation would:

- Recognize genetic counselors as Medicare Part B providers, reimbursed at 85% of the physician rate
- Support telehealth expansion to reach rural and underserved populations
- Require state licensure OR national American Board or Genetic Counseling certification in states without licensure
- Preserve the ability of other practitioners to provide genetic counseling

If enacted, the legislation estimates significant Medicare savings in the next decade through reductions in inappropriate testing and improved efficiency in patient management.

Electronic Data Exchange in Genetic Counseling

Electronic data exchange refers to the structured, interoperable sharing of clinical and genomic data across:

- Laboratory Information Systems
- Electronic Health Records (EHRs)
- Health information exchanges

Health Level 7 (HL7) Fast Healthcare Interoperability Resources (FHIR®) Standards

Today's genetic results are often delivered as PDFs or unstructured text-making the data difficult to integrate into clinical workflows. In addition, genomic data is complex and often generated outside of traditional EHRs. Thus, modern interoperability standards are essential. The HL7 FHIR framework is emerging as the standard for genomic data exchange, with the HL7 Clinical Genomics Work Group developing "FHIR Genomics Reporting." With FHIR Genomics, data becomes structured, computable, and interoperable. This enables:

- Clinical decision support
- Population health analytics
- Standardized representation of variants and genotypes
- More scalable precision medicine
- Integration of genomic data into the EHR and clinical workflow
- Consistent data exchange across laboratories and health care systems

CGCs are identified as key users of FHIR-based genomic data, enabling more accurate decision-making and integration of genomics into routine care.

Note: The National Society of Genetic Counselors (www.nsgc.org) supports interoperability and data sharing as foundational to the future of genetic counseling, ensuring high-quality, structured, scalable genetic information delivery.

Citations:

Access to Genetic Counselor Services Act
Genomics - FHIR v6.0.0-ballot4
Genomics Data Standardization with FHIR – FHIR® for Research
Genomics - FHIR v5.0.0

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