

April 16, 2026

Senator John Laird, Chair
Committee on Budget and Fiscal Review
California Senate
Capitol Office
1021 O Street, Suite 8720
Sacramento, CA 95814

Senator Caroline Menjivar, Chair
Subcommittee on Health & Human Services
Committee on Budget and Fiscal Review
California Senate
Capitol Office, 1021 O Street, Suite 6630
Sacramento, CA 95814

Senator Roger Niello, Vice Chair
Committee on Budget and Fiscal Review
California Senate
Capitol Office,
1021 O Street, Suite 7110
Sacramento, CA 95814

Senator Shannon Grove, Ranking Member
Subcommittee on Health & Human Services
Committee on Budget and Fiscal Review
California Senate
Capitol Office, 1021 O Street, Suite 7150
Sacramento, CA 95814

Dear Chair Laird, Vice Chair Niello, Chair Menjivar, and Ranking Member Grove:

The undersigned organization(s) urge the California Legislature to reverse the substantial increases in licensure fees recently imposed on the state's medical laboratory professionals. The new annual fees more than triple the previous biennial renewal rates and significantly increase the regulatory burden on licensees. There was no viable public opportunity for stakeholders to comment prior to this legislation being approved by the legislature and signed into law by the Governor.

AB 144 raised the licensure fees for all laboratory professionals. The licensure fees for clinical laboratory scientists (also known as medical laboratory scientists) and medical laboratory technicians increased from \$230 for initial licensure and \$179 for renewal (biennially) to \$300 *annually* for initial and renewal licenses. Comparable increases were also applied to other categories of laboratory professionals, including doctoral-level laboratory professionals, cytotechnologists (currently referred to professionally as cytologists), categorical scientists, and phlebotomists (see [here](#)). These new fees are now roughly double the average charged to other non-doctoral degree licensed health professions.

California's new fees also greatly exceed laboratory personnel licensure fees in other states. For example, in New York, where the cost of living is similar, licensing fees for scientist-level personnel is \$345 and \$170 (triennially) for initial and renewal licenses, respectively (For information on other state licensure rates, see [here](#)). Further, for reasons that are unclear, AB 144 replaced the biennial license with an annual license, doubling the costs and administrative burden over a two-year period.

Except for [physicians](#) (\$1,206 biennially renewal) and [psychologists](#) (\$825 biennially renewal), we are not aware of any other health profession in California with higher licensing fees. By comparison, registered nurses and advanced practice nurses pay [\\$190 and \\$150](#), respectively, for biennial renewal—equivalent to \$80 and \$75 annually. Initial licensure fees for [pharmacists](#) and intern pharmacists were reduced in 2025, dropping from \$215 to \$195 for pharmacists and from \$230 to \$175 for intern pharmacists. Because healthcare licensing boards all perform relatively similar types of work, the cost of administering licensure programs should be similar. Consequently, the new fees for laboratory personnel raise serious concerns of fairness and accuracy.

Two additional issues should also be addressed: the cost of renewal relative to initial licensure and the cost of supplemental licenses. From our perspective, renewal fees should be lower than initial licensure fees, as the initial review requires verification of education, training/experience, and board certification—activities not repeated during the renewal process. Renewal typically involves confirming continuing education and other recurring requirements, a far less intensive review. As noted, genetic counselors pay half as much for renewal as for initial licensure. Renewal fees for laboratory professionals should continue to be similarly discounted.

Many laboratory professionals hold multiple specialty licenses—for example, an individual may hold a generalist clinical laboratory scientist license (referred to professionally as medical laboratory scientists) plus a categorical license in cytogenetics and/or histocompatibility. Per AB 144, each additional license costs the same as the first, despite the minimal incremental work to verify qualifications for the additional specialty(ies) (At a minimum, the education and training have already been reviewed). Under the new structure, holding two licenses now costs \$1,200 over two years—nearly equivalent to the cost of physician licensure renewal. Holding three licenses would cost \$1800 over two years, a cost that to our knowledge exceeds the licensure fees for every other licensed health profession in California.

These dramatic fee increases are not affordable for this already strained workforce, and we are concerned this will worsen existing [shortages](#) of skilled laboratory professionals in California. These costs may discourage professionals from practicing in the state or from pursuing additional specialty licensure, both of which would negatively impact patient access to essential diagnostic testing. Further, difficulty hiring laboratory professionals could incentivize medical and public health laboratories, already paying more for laboratory licensure, to relocate their businesses outside California, reducing the revenue the state receives from these businesses and from employed taxpayers. Laboratory testing is foundational to patient care, and it is critical to the efficient use of limited healthcare resources (see [here](#)).

We urge the Budget Committee to revise the licensure fee structure for California's laboratory professionals by substantially reducing the costs for initial licensure, renewal, and additional specialty licenses. Moreover, we urge the Legislature to provide

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laboratory professionals with a triennial license, which will help reduce the cost and burden to licensees and the state.

Sincerely,

American Association of Pathologists' Assistants

American Society for Clinical Laboratory Science (ASCLS)

ASCLS-California

American Society for Clinical Pathology (ASCP)

ASCP Board of Certification

ASCP Northern California Chapter

Association for Diagnostics & Laboratory Medicine

Association of Genetic Technologists

Blood Centers of California

California Blood Bank Society

California Society for Histotechnology

Clinical and Laboratory Standards Institute (CLSI)

Engineers and Scientists of California Local 20, IFPTE

National Accrediting Agency for Clinical Laboratory Sciences

Northern California Branch, American Society of Microbiology

Northern California Community Blood Bank

National Society for Histotechnology

Philippine Association of Medical Technologists USA, Inc. (PAMET)

PAMET Northern California Chapter

Tahoe Forest Health System

The Proficient Lab Inc

cc: Governor Gavin Newsom

Dr. Erica Pan, MD, MPH, FIDSA, FAAP, CDPH

Members, California Senate Committee on Budget & Fiscal Review

Members, California Assembly Budget Committee