

Forensic Genetic Genealogical DNA Analysis (FGGS) Virtual Sub-Panel Meeting

June 10, 2026

A wooden-framed letterboard with a black felt surface is centered on a rustic wooden table. The word "Welcome" is written in white, sans-serif capital letters. To the bottom left, a portion of a vintage orange rotary telephone is visible. In the top right corner, a green leafy plant and a dark object are partially seen.

WELCOME

March 4, 2026: Follow-up Item

- Follow-up with the Investigative Genetic Genealogy Accreditation Board (IGGAB) for more insight on whether obtaining a license or accreditation changes access to records and documents about people and personal identifying information.
- IGGAB clarified that their accreditation does NOT change access to records/documents, etc. To further clarify a common misconception about record access:
 - Traditional Genetic Genealogists (not doing work for law enforcement) have access to ALL consumer DNA databases and records/tree-building platforms in their work
 - Investigative Genetic Genealogists (IGGs) (whether accredited or not) are restricted to only those which allow law enforcement use under their terms of service

Additional Insight from Follow-up Item

- IGGAB recommends a correction to the [pre- and post-authorization process](#) document:
 - Replace “**DNASolves**” with “**DNA Justice**”
 - It is the third DNA database accessible to IGGs: [FamilyTreeDNA](#), [GEDmatch](#), and [DNA Justice](#)
- Accredited IGGs (AIGGs) are held accountable for any ethics violation through the IGGAB’s [Ethics Committee](#).

Licensing Requirements

[Section 17-104\(a\) of the Criminal Procedure Article](#) requires the Maryland Department of Health (MDH) Office of Health Care Quality (OHCQ) to:

- Create a licensing program for individuals performing genetic genealogy
- Establish a new licensing program for laboratories that perform forensic genetic genealogical DNA analysis

Licensing Requirements: Recommendations

License Individuals Performing Genetic Genealogy

1. Model existing certification process for chemists.
2. Amend the statute to remove the licensing requirement and instead regulate genealogists under forensic laboratories licensed by OHCQ.
3. Use IGGAB's Accreditation Exam to satisfy the licensing requirement.

Establish Licensing Program/Board for BOTH Laboratories Performing SNP Sequencing and Individuals Performing Genetic Genealogy

4. Amend the statute to remove the licensing program/board requirement from OHCQ and instead create a new licensing program/board under [Health Professional Licensing Boards](#).

#1: Model Certification Process for Chemists

Use existing process for chemists as a model for certifying genetic genealogists.

- Governs certification of chemists, chemical analysts, and analysts who perform testing of controlled dangerous substances in forensic laboratories.
- Necessary so results generated by analysts are admissible in court proceedings.
- Requires applicants to **complete a training program licensed or approved by MDH**; or applicants may complete the U.S. Department of Justice, Drug Enforcement Administration's **basic forensic drug chemist training program**.

#1: Model Certification Process for Chemists (Con.)

- Requires chemists, chemical analysts, and analysts to **complete drug identification procedures approved by an MDH licensed forensic laboratory** or those outlined in the *Forensic Chemists and Analysts Training and Procedures Manual* from 1992.
 - *Forensic Chemists and Analysts Training and Procedures Manual*: Remains legally valid; however, most forensic laboratories follow updated practices consistent with their laboratory's accreditation standards such as ISO/IEC 17025.

#1: Arguments Against this Recommendation

- The model for chemists is similar to licensure in that it requires a uniform, recognized certification body, which makes the model unworkable.
- Limited existing IGG training
 - Several IGG courses are offered by universities and other organizations
 - Vary in length and focus, content and cost
 - Not graded; no final exam
 - Federal Bureau of Investigation IGG training program
 - Available only to existing law enforcement
 - One week (maybe 40 hours)
 - Introductory in scope rather than comprehensive
 - Not graded; no final exam

#1: Arguments Against this Recommendation (Con.)

- Existing Procedures Manuals
 - None exist to specify how individuals should perform genetic genealogy work
- Existing Standards
 - Not governed by any national or international standards (ISO/IEC/NIST, etc.)
 - IGGAB has published standards, yet they are generally applicable; not specific
- Unnecessary for Court Proceedings
 - Genetic genealogy does not provide definitive proof of identity in itself; must always be verified by confirmatory DNA testing
 - Court proceedings over the last eight years conclude that this work is a lead-generation only; not evidence

#2: Amend the Statute

Amend the statute to remove the individual-level licensing requirement and instead regulate genetic genealogists under forensic laboratories licensed by OHCQ.

- Genetic genealogists should not be licensed under the State Board of Physicians because it is not a health-related profession, so it should be regulated under laboratories instead.
- Licensure of individual genetic genealogists is not feasible because licensure is the final regulatory option, and not the first step.
 - No standardized training program exists
 - Without uniformity, it is not possible to create minimum qualifications for licensure
 - No uniform examination
 - No certification body to establish minimum qualifications

#2: Amend the Statute (Continued . . .)

- Regulatory work already exists under [§§ 17-2A-01 - 17-2A-02](#) of the Health General Article in which genetic genealogists could be regulated under forensic laboratories licensed by OHCQ, without additional special or general funding. The statute also gives authority to the Secretary of MDH to inspect, set standards and requirements, and impose sanctions for non-compliance.
- Licensed forensic laboratories are responsible for its employees, all testing conducted, and ensure compliance with State and federal laws. Under this licensure structure, the regulatory process for genetic genealogists would be more strict than an individual-level licensure requirement.

#2: Amend the Statute (Continued)

- Existing regulations allow for adding “a new discipline, subdiscipline, or forensic analysis” under [COMAR 10.51.03.03H](#) which may not be necessary because the requirements for forensic analysts under [COMAR 10.51.06](#) may already cover individuals performing forensic genetic DNA analysis.

#2: Arguments Against this Recommendation

- While genetic genealogy is not a health-related profession, neither is it a forensic discipline
 - More closely aligned with investigative, research and genealogy professions
- Licensure of individuals is feasible
 - Existing competency exam and accreditation body (IGGAB)
- Should the Secretary of MDH have authority to “inspect, set standards and requirements, and impose sanctions” over a profession that is not within their field of expertise?
 - Much genetic genealogy work is done from home and outside the state of Maryland, making inspections challenging
 - Standards and requirements for the work of genetic genealogists should be governed by a body of their peers rather than those who do not perform the work

#2: Arguments Against this Recommendation (Con.)

- Most genetic genealogists are not employees of forensic laboratories
 - Even those who are, do not do the work of traditional forensic scientists.
Therefore, the work they do is not regulated by State or federal laws related to forensic science. So rather than making this structure more strict, it becomes irrelevant.
- Genetic genealogy is NOT the same as “forensic genetic DNA analysis” which is done in a forensic laboratory, so should not become a discipline under COMAR.
 - These are two entirely different professions and skill sets

#3: Use the IGGAB Accreditation Exam

- [IGGAB](#) formed in 2022, in response to the need for professional standards, ethical guidelines, and proof of competency.
- Published [Professional Standards and Code of Ethics](#) for the field
- Developed and launched the [Accreditation Exam](#) in conjunction with stakeholders and subject matter experts.
 - Measures knowledge in core competencies needed for proficient IGG work
 - Rigorous, three-hours long, randomized questions/scenarios, live proctoring
 - Educational prerequisites planned for 2027 to align with new resources in the profession
- Passing the exam and committing to the Standards and Ethics allows one to become an [Accredited Investigative Genetic Genealogist \(AIGG\)](#)
- Re-accreditation after two years
 - Mixture of continuing education and casework

#3: Use the IGGAB Accreditation Exam (Cont . . .)

- Since the public launch of the AIGG program in April 2025, over 30 individuals have become accredited and added to the [AIGG Registry](#).
- Established an [Ethics Committee](#) to ensure ethical conduct and accountability of AIGGs.
- Formed the [Investigative Genetic Genealogy Association](#) which supports the professional practice of investigative genetic genealogy through education, shared resources, and a collaborative community.

#3: Use the IGGAB Accreditation Exam (Cont.)

- Additional possible licensure requirements:
 - Background checks
 - Reporting requirements to ensure data submission for the annual report
- Collaborate with IGGAB to identify AIGGs who qualify for licensure

#3: Arguments Against this Recommendation

- Individual expense of \$450 to take the exam, no cost to Maryland
- Use of an outside agency to fulfill licensure may be easier than building it ourselves
- Licensed IGGs work under the direction of Maryland investigating agencies
 - Reporting must be driven through investigating agencies rather than individual IGGs
- Currently no educational prerequisites (until 2027 at earliest)
 - There is no standardized education path to becoming an IGG currently which makes it difficult to set requirements

#4: Create New Licensing Program / Board

Amend the statute to remove the licensing program/board requirement from OHCQ and instead create a new program/board under [Health Professional Licensing Boards](#).

- Boards regulate healthcare practitioners to ensure public safety, competent care, and professional accountability across the State; and establish practice standards, issue licenses, and enforce State laws.
- Boards manage a three-tier regulatory process:
 - Licensure and Credentialing
 - License Maintenance
 - Public Protection and Discipline

#4: Create New Licensing Program / Board (Cont.)

- Funding and staffing resources are essential to ensure licensure or accreditation of individuals performing genetic genealogy, track licensed or accredited individuals, and ensure public protection and discipline.

Health Professional Licensing Boards		
LICENSING BOARDS	E-MAILS	PHONE NUMBER
Acupuncture, Board of	mdh.acupuncture@maryland.gov	410-764-4766
Audiology, Hearing Aid Dispensers, Speech/Language Pathologists	mdh.boardofahsm@maryland.gov	410-764-4725
Chiropractic Examiners, Board of	mdh.chiropractic@maryland.gov	410-764-4738
Dental Examiners, Board of	mdh.mddentalboard@maryland.gov	410-402-8500
Dietetic Practice, Board of	marie.savage@maryland.gov	410-764-4733
Environmental Health Specialists, Board of	leigh.broderick@maryland.gov	410-764-3512
Kidney Disease, Commission of	eva.schwartz@maryland.gov	410-764-4799
Long-Term Care Administrators, Board of	mdh.bitca@maryland.gov	410-764-4750
Massage Therapy Examiners, Board of	mdh.bcmte@maryland.gov	410-764-4738
Morticians and Funeral Directors, Board of	MDH.BOMFD@maryland.gov	410-764-4792
Nursing, Board of		410-585-1900
Occupational Therapy Practice, Board of	mdotboard.user@maryland.gov	410-402-8556
Optometry, Board of	mdh.optometry@maryland.gov	410-764-4711
Pharmacy, Board of	MDH.MDBOP@maryland.gov	410-764-4755
Physical Therapy Examiners, Board of	mdh.bphte@maryland.gov	410-764-4718
Physicians, Board of	mbpmail@rcn.com	410-764-4777
Podiatric Medical Examiners, Board of	eva.schwartz@maryland.gov	410-764-4785
Professional Counselors and Therapists, Board of	mdh.bopct@maryland.gov	410-764-4732
Psychologists, Board of	mdh.psychologyboard@maryland.gov	410-764-4787
Residential Childcare Professionals, Board of	mdh.crcopa@maryland.gov	410-764-5996
Social Work Examiners, Board of	mdh.socialwork@maryland.gov	410-764-4788

Key Takeaways

	Require Statutory Change	Funding Amount Needed	Existing License or Certification	Include Reporting Requirement	Existing Tracking	Existing Compliance / Appeal
Model Certification Process for Chemists	Yes	Unknown	No	Unknown	No	No
Amend the Statute	Yes	No	No	Unknown	No	No
Use the IGGAB Accreditation Exam	No	No (\$450 per exam paid by examinee)	Accreditation Exam (AIGG)	Yes	Yes	Ethics Committee

Recommendation for Next Steps

[Section 17-104\(a\) of the Criminal Procedure Article](#) requires OHCQ to create a licensing program for individuals performing genetic genealogy; and establish a new licensing program for laboratories that perform forensic genetic genealogical DNA analysis.

- Invite IGGAB to present to the panel and provide more detail.
- Add an IGG practitioner to the panel and/or licensing board.
- Should panel members complete a survey to vote on the best recommendation(s) and provide feedback on their decision?
- Gather information on funding needs and specific statutory changes for selected recommendations.
- Share survey findings and gathered information with MDH and offer assistance on efforts forward.





Thank
You