

Statement of Deficiencies	(X1) Provider/Supplier/CLIA Identification Number 01D0918760	(X3) Date Survey Completed 09/11/2018
Name of Provider or Supplier Forefront Dermatology, Sc	Street Address, City, State 8573 County Road 64, Daphne, AL	
For information on the provider's plan to correct this deficiency, please contact the provider or the state survey agency.		

(X4) ID Prefix Tag	Summary Statement of Deficiencies
D5473	<p>CONTROL PROCEDURES CFR(s): 493.1256(e)(2)(g)</p> <p>(e) For reagent, media, and supply checks, the laboratory must do the following: (e) (2) Each day of use (unless otherwise specified in this subpart), test staining materials for intended reactivity to ensure predictable staining characteristics. Control materials for both positive and negative reactivity must be included, as appropriate. (g) The laboratory must document all control procedures performed.</p> <p>This STANDARD is not met as evidenced by: Based on a lack of documentation for the daily slide control quality, and an interview with Mohs Technician #1, the surveyor determined one of two Mohs Surgeons (Clinical Consultant #2) failed to assess and document the slide stain quality on 33 days of patient testing from September 2017 thru August 2018. The findings include: 1. During the entrance interview and review of the CMS Form-209 at approximately 11:30 AM on 9/11/2018, Mohs Technician #1 stated the facility has had a second physician (Clinical Consultant #2) performing Mohs surgical procedures since 9/15 /2017. [Mohs surgical procedures include on-site preparation, reading and interpretation of Histopathology slides from frozen section specimens.] Mohs Tech #1 explained the Laboratory Director scheduled his Mohs surgery cases every Monday, and Clinical Consultant (CC) #2 scheduled his cases on Thursdays or Fridays two to four days a month. 2. A review of the MOHS Procedure Manual in Section 5 under "Daily Quality Control" revealed, "A daily control is done each surgery day. The first slide of the day is evaluated by the physician for acceptable staining and microtomy ... '. 3. A review of the Histology records revealed documentation of the daily slide stain quality only on days when the Laboratory Director performed Mohs surgical procedures There were no records of daily slide quality control on days when the CC #2 read the Mohs Histopathology slides. 4. A review of the Mohs patient log revealed the CC #2 performed Mohs surgery on 84 patients on 8 days (9/15 thru 12/19/2017) in 2017, and on 393 patients on 25 days (1/16 thru 8/31/2018) in 2018, for a total of 33</p>

days with no documentation of daily slide quality control. 5. During an interview on 9/11/2018 at 2:15 PM, Mohs Tech #1 confirmed the laboratory had no documentation of daily slide quality control for the CC #2. Thus the above noted findings were confirmed. SURVEYOR: Laura T. Williams, BS, MT (ASCP) Licensure and Certification Surveyor