

Statement of Deficiencies	(X1) Provider/Supplier/CLIA Identification Number 21D1057101	(X3) Date Survey Completed 09/26/2022
Name of Provider or Supplier Annapath, Inc	Street Address, City, State 4801 Tesla Dr Suite H J K L & M, Bowie, MD	
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
D5311	<p>SPECIMEN SUBMISSION, HANDLING, AND REFERRAL CFR(s): 493.1242(a)</p> <p>The laboratory must establish and follow written policies and procedures for each of the following, if applicable: (1) Patient preparation. (2) Specimen collection. (3) Specimen labeling, including patient name or unique patient identifier and, when appropriate, specimen source. (4) Specimen storage and preservation. (5) Conditions for specimen transportation. (6) Specimen processing. (7) Specimen acceptability and rejection. (8) Specimen referral.</p> <p>This STANDARD is not met as evidenced by: Based on review of the standard operating procedure manual (SOPM) and interview with the laboratory supervisor (LS), the laboratory failed to have a procedure for performing a specimen recut for microscopic slide examination for histopathology testing. Findings: 1. The laboratory performed both the technical (gross examination) and professional (microscopic examination) components of histopathology testing. 2. The technical and professional components shared a laboratory information system (LIS). 3. The LS stated that the pathologists (professional) requested recut specimens for microscopic examinations through the LIS. The request for a recut was then placed on the laboratory's (technical) daily workload list within the LIS. Once received, the laboratory personnel retrieved the stored patient block, performed the recut, and sent the new slides to the pathologist for microscopic examination. 4. During the survey on 09/26/2022 at 3:30 PM, the LS confirmed that the laboratory's SOPM did not have a procedure for the technical component of the laboratory to receive and perform a recut.</p>
D6168	<p>TESTING PERSONNEL CFR(s): 493.1487</p> <p>The laboratory has a sufficient number of individuals who meet the qualification</p>

requirements of 493.1489 of this subpart to perform the functions specified in 493.1495 of this subpart for the volume and complexity of testing performed.

This CONDITION is not met as evidenced by:

Based on review of personnel files and staff interviews, the laboratory failed to ensure that testing personnel performing gross examinations for histopathology were qualified to perform high complexity testing (refer to D6171).

D6171

TESTING PERSONNEL QUALIFICATIONS

CFR(s): 493.1489(b)

(b) Meet one of the following requirements: (b)(1) Be a doctor of medicine, doctor of osteopathy, or doctor of podiatric medicine licensed to practice medicine, osteopathy, or podiatry in the State in which the laboratory is located or have earned a doctoral, master's or bachelor's degree in a chemical, physical, biological or clinical laboratory science, or medical technology from an accredited institution; (b)(2)(i) Have earned an associate degree in a laboratory science, or medical laboratory technology from an accredited institution or-- (b)(2)(ii) Have education and training equivalent to that specified in paragraph (b)(2)(i) of this section that includes-- (b)(2)(ii)(A) At least 60 semester hours, or equivalent, from an accredited institution that, at a minimum, include either-- (b)(2)(ii)(A)(1) 24 semester hours of medical laboratory technology courses; or (b)(2)(ii)(A)(2) 24 semester hours of science courses that include-- (b)(2)(ii)(A)(2)(i) Six semester hours of chemistry; (b)(2)(ii)(A)(2)(ii) Six semester hours of biology; and (b)(2)(ii)(A)(2)(iii) Twelve semester hours of chemistry, biology, or medical laboratory technology in any combination; and (b)(2)(ii)(B) Have laboratory training that includes either of the following: (b)(2)(ii)(B)(1) Completion of a clinical laboratory training program approved or accredited by the ABHES, the CAHEA, or other organization approved by HHS. (This training may be included in the 60 semester hours listed in paragraph (b)(2)(ii)(A) of this section.) (b)(2)(ii)(B)(2) At least 3 months documented laboratory training in each specialty in which the individual performs high complexity testing. (b)(3) Have previously qualified or could have qualified as a technologist under 493.1491 on or before February 28, 1992; (b)(4) On or before April 24, 1995 be a high school graduate or equivalent and have either-- (b)(4)(i) Graduated from a medical laboratory or clinical laboratory training program approved or accredited by ABHES, CAHEA, or other organization approved by HHS; or (b)(4)(ii) Successfully completed an official U.S. military medical laboratory procedures training course of at least 50 weeks duration and have held the military enlisted occupational specialty of Medical Laboratory Specialist (Laboratory Technician); (b)(5)(i) Until September 1, 1997-- (b)(5)(i)(A) Have earned a high school diploma or equivalent; and (b)(5)(i)(B) Have documentation of training appropriate for the testing performed before analyzing patient specimens. Such training must ensure that the individual has-- (b)(5)(i)(B)(1) The skills required for proper specimen collection, including patient preparation, if applicable, labeling, handling, preservation or fixation, processing or preparation, transportation and storage of specimens; (b)(5)(i)(B)(2) The skills required for implementing all standard laboratory procedures; (b)(5)(i)(B)(3) The skills required for performing each test method and for proper instrument use; (b)(5)(i)(B)(4) The skills required for performing preventive maintenance, troubleshooting, and calibration procedures related to each test performed; (b)(5)(i)(B)(5) A working knowledge of reagent stability and storage; (b)(5)(i)(B)(6) The skills required to implement the quality control policies and procedures of the laboratory; (b)(5)(i)(B)(7) An awareness of the factors that influence test results; and (b)(5)(i)(B)(8) The skills required to assess and

verify the validity of patient test results through the evaluation of quality control values before reporting patient test results; and (b)(5)(i)(B)(8)(ii) As of September 1, 1997, be qualified under 493.1489(b)(1), (b)(2), or (b)(4), except for those individuals qualified under paragraph (b)(5)(i) of this section who were performing high complexity testing on or before April 24, 1995; (b)(6) For blood gas analysis-- (b)(6)(i) Be qualified under 493.1489(b)(1), (b)(2), (b)(3), (b)(4), or (b)(5); (b)(6)(ii) Have earned a bachelor's degree in respiratory therapy or cardiovascular technology from an accredited institution; or (b)(6)(iii) Have earned an associate degree related to pulmonary function from an accredited institution; or (b)(7) For histopathology, meet the qualifications of 493.1449 (b) or (l) to perform tissue examinations.

This STANDARD is not met as evidenced by:

Based on review of the personnel files and interview with the vice president (VP), one of the two testing personnel (TP) performing gross examinations was not qualified to perform high complexity testing. Findings: 1. The laboratory performed both the technical (gross examination) and professional (microscopic examination) components of histopathology testing. 2. The pathologists (professional) delegated the gross examination responsibilities (technical) to the TP and reviewed all gross descriptions within 24 hours. 3. One of two TP that performed the gross examinations did not meet the minimum qualifications for TP performing high complexity testing. 4. During the survey on 09/26/2022 at 3:30 PM, the VP confirmed that one of the two TP performing the gross examinations did not meet the minimum qualifications for high complexity TP.