

Statement of Deficiencies	(X1) Provider/Supplier/CLIA Identification Number 27D2293215	(X3) Date Survey Completed 01/08/2026
Name of Provider or Supplier Forefront Dermatology - Mohs Clinic	Street Address, City, State 2875 Tina Ave Ste 104, Missoula, MT	
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
D0000	The Montana CLIA Program conducted an announced CLIA recertification survey on January 8, 2026. The laboratory was surveyed under 42 CFR part 493 CLIA regulations and was found to be in compliance with condition-level CLIA requirements. However, the following standard-level deficiencies were identified during the survey.
D6127	<p>TECHNICAL SUPERVISOR RESPONSIBILITIES CFR(s): 493.1451(b)(9)</p> <p>(b)(9) Evaluating and documenting the performance of individuals responsible for high complexity testing at least semiannually during the first year the individual tests patient specimens.</p> <p>This STANDARD is not met as evidenced by: Based on a review of 2025 testing personnel records and an interview with the Clinic Supervisor (not listed on the CMS-209 Laboratory Personnel Report form), the technical supervisor failed to perform semiannual competency evaluations for three of three testing personnel (TP) during their first year of high-complexity testing from January 8, 2024, to January 8, 2026. Findings: 1. A review of testing personnel records revealed the laboratory failed to complete the required six-month Mohs Technician evaluation for TP #1, TP #8, and TP #10, as stated in the "Personnel Competency Testing" policy: "initially, 6 months after the start date, and annually thereafter." 2. An interview conducted on January 8, 2026, at 9:30 AM with the Clinic Supervisor (not listed on the CMS-209 form) confirmed the lack of a second evaluation by the technical supervisor for three testing personnel during their first year of high complexity grossing from January 8, 2024, to January 8, 2026.</p>
D6128	<p>TECHNICAL SUPERVISOR RESPONSIBILITIES CFR(s): 493.1451(b)(9)</p>

(b)(9) Thereafter, evaluations must be performed at least annually unless test methodology or instrumentation changes, in which case, prior to reporting patient test results, the individuals performance must be reevaluated to include the use of the new test methodology or instrumentation.

This STANDARD is not met as evidenced by:

Based on a review of 2025 testing personnel records and an interview with the Clinic Supervisor (not listed on the CMS-209 Laboratory Personnel Report form), the technical supervisor failed to perform annual competency assessments for three of ten testing personnel (TP) in 2025. Findings: 1. A review of the testing personnel records lacked a 2025 annual Mohs Technician Evaluation for TP #2, TP #3, and TP #10 as stated in the "Personnel Competency Testing" policy: "initially, 6 months after the start date, and annually thereafter." 2. An interview conducted on January 8, 2026, at 9:30 AM with the Clinic Supervisor (not listed on the CMS-209 form) confirmed that three of ten testing personnel did not have a 2025 annual competency assessment completed by the technical supervisor.