

This STANDARD is not met as evidenced by:

An unannounced revisit was performed on 2/19/20 -2/21/20. **New Deficiency II. Based on review of the American College of American Pathologists (CAP) laboratory proficiency testing (PT) records, and confirmed in the laboratory failed to verify the accuracy of the nonregulated analytes Influenza A Subtype, Parainfluenza 2019. Findings were: 1. Review of the laboratory policy Proficiency Testing Policy (Ver 1) in use 7/1 and Corrective Action Response revealed "the laboratory shall investigate and take corrective actions on PT results. Review of corrective actions must be documented and kept in the laboratory for a minimum of the CAP Actions Laboratories Should Take When PT Result is not Graded (Rev 8/2019) revealed 'identify all analytes with an exception reason code, review and document the acceptability of performance and retain documentation of review for at least 2 years. [26] Review participant summary for comparison document performance accordingly. Evaluation criteria are not established for educational challenge. determine their own evaluation criteria approved by their their laboratory director for self evaluation.' the CAP proficiency testing records from 2019 revealed the following 4 of 8 events with no documented evaluation for the analytes not graded by CAP. IDR-A 2019 Influenza A Subtype IDR-1 [26] IDR-2 [26] IDR-5 [26] Parainfluenza Subtype IDR-1 [26] IDR-2 [26] IDR-3 [26] IDR-4 [26] IDR-5 [26] COVID-19 [26] IDR-2 [26] IDR-3 [26] IDR-4 [26] IDR-5 [26] IDR-B 2019 Influenza A Subtype IDR-6 [26] IDI [26] IDR-9 [26] IDR-10 [26] Parainfluenza Subtype IDR-6 [26] IDR-7 [26] IDR-8 [26] IDR-9 [26] IDR-11 [26] Influenza A Subtype IDR-11 [26] IDR-12 [26] IDR-13 [26] IDR-14 [26] IDR-15 [26] Parainfluenza Subtype IDR-12 [26] IDR-13 [26] IDR-14 [26] IDR-15 [26] Coronavirus Strain IDR-11 [26] IDR-12 [26] IDI [26] IDR-15 [26] 4. An interview with the technical supervisor on 2/20/20 at 1000 hours in the break room above findings. She stated that she and the testing personnel would review all the results for accuracy of the reviews.

41687 Unannounced revisit performed on 2/19/20 - 2/21/20: **New deficiency I. Based on a review of the American Proficiency Institute's proficiency testing evaluation records for 2019 and staff interview, it was determined the laboratory failed to have documentation of verifying the accuracy of analytes that were not graded by the proficiency testing program for 3 of 3 hematology events in 2019. Findings include: 1. A review of the American Proficiency Institute's 'Proficiency Testing Performance Evaluation' form revealed the following: "Laboratories should review the Participant Summary and Comparative Evaluation thoroughly for failures or 'not graded' analytes. Laboratories should be documenting and performing corrective action for failures and must perform a self-evaluation using the Participant Data Summary for samples that have not been graded." 2. A review of the laboratory's American Proficiency Institute proficiency testing evaluation records for hematology testing (Hematology/Coagulation events) revealed the following analytes were scored as not graded: a) 2019 Hematology/Coagulation - 1st Event Eosinophil DIF-01 Lymphocyte DIF-01 Monocyte DIF-01 Neutrophil DIF-01 Blood Cell ID ECI-01 Blood Cell ID ECI-03 Blood Cell ID ECI-04 Blood Cell ID ECI-05 Nucleated RBCs COU-02 b) 2019 Hematology/Coagulation- 2nd Event Lymphocyte DIF-02 Monocyte DIF-02 Neutrophil DIF-02 Blood Cell ID ECI-06 Blood Cell ID ECI-07 Blood Cell ID ECI-08 Blood Cell ID ECI-09 Blood Cell ID ECI-10 Nucleated RBCs COU-03 c) 2019 Hematology/Coagulation- 3rd Event Basophil DIF-03 Eosinophil DIF-03 Immature Cell DIF-03 Lymphocyte DIF-03 reactive DIF-03 Monocyte DIF-03 Neutrophil, segmented DIF-03 NRBC/100 WBC DIF-03 Unclassified Cell ID ECI-11 Blood Cell ID ECI-12 Blood Cell ID ECI-13 Blood Cell ID ECI-14 Blood Cell ID ECI-15 COU-12 3. An interview with technical consultant #1 (as indicated on the CMS 209 form) on 2/19/2020 the laboratory revealed the laboratory failed to have documentation verifying the accuracy of the above analytes as not graded by the proficiency testing program. This confirmed the above findings. Key: NRBC= Neutrophil/Red Blood Cells WBC= White blood cells RBC= Red blood cells

D5415

TEST SYSTEMS, EQUIPMENT, INSTRUMENTS, REAGENT
CFR(s): 493.1252(c)

Reagents, solutions, culture media, control materials, calibration materials, and other supplies, as applicable to indicate the following: (1) Identity and when significant, titer, strength or concentration. (2) Storage and handling instructions. (3) Preparation and expiration dates. (4) Other pertinent information required for proper use.

This STANDARD is not met as evidenced by:

Unannounced revisit performed on 2/19/20 - 2/21/20: **New deficiency I. Based on surveyor observation, currently in use for the Beckman Coulter DxH 600 hematology analyzer, a review of the manufacturer interview, it was revealed the laboratory failed to document the open dates and revised expiration dates for the Beckman Coulter DxH 600 hematology analyzer. Findings include: 1. Surveyor observation of the laboratory at 10:00 a.m. in the laboratory revealed the following reagents currently in use on the Beckman Coulter analyzer (serial number BB51913): 2 bottles of Coulter DxH Diluent Lot number: 3527260 No open date No revised expiration date 1 bottle of Coulter DxH Cleaner Lot number: 3913020 No open date No revised expiration date 1 bottle of Coulter DxH Diff Pack Lot number: 3611400 No open date No revised expiration date 1 bottle of Coulter DxH CBC Lyse Lot number: 3711180 No open date No revised expiration date 2. A review of the manufacturer's instructions for the Beckman Coulter DxH 600 analyzer indicated the following Open Expiration Days for the following reagents: Coulter DxH Diluent- open expiration 90 days Coulter DxH Cleaner- open expiration 90 days Coulter DxH Diff Pack- open expiration 60 days Coulter DxH CBC Lyse- open expiration 60 days 3. An interview with the laboratory technician (as indicated on the CMS 209 form) on 2/21/20 at 10:05 a.m. in the laboratory revealed that the laboratory technician reagent so quickly that they do not write the open date or revised expiration on the reagent boxes. This was confirmed during the findings. Unannounced revisit performed on 2/19/20 - 2/21/20: **New Deficiency II. Based on review of the manufacturer's instructions for the Beckman Coulter ES Cell Controls, surveyor observation of the quality control materials and an interview, it was revealed the laboratory failed to have a mechanism in place to ensure QC was not utilized in excess of 18 times within 16 days, according to the Beckman Coulter manufacturer's instructions. Findings include: 1. A review of the manufacturer's instructions for the Beckman Coulter ES Cell Controls under the Table of Expected Results indicated that the Instructions for Use section of the package insert is performed a maximum of 18 times within 16 days. 2. Surveyor observation on 2/20/20 at 12:30 p.m. in the laboratory revealed the following lot numbers of Beckman Coulter ES Cell Controls in use: Level 1 lot number: 123172980 expiration: 2/22/20 opened: 2/17/20 Level 2 lot number: 143192980 expiration: 2/22/20 opened: 2/17/20 Level 3 lot number: 143192980 expiration: 2/23/20 opened 2/17/20. 3. An interview with the laboratory technician (as indicated on the CMS 209 form) on 2/20/20 at 3:00 p.m. in the laboratory revealed "the quality control is good for 30 days." 4. An interview with technical consultant #1 (as indicated on the CMS 209 form) on 2/20/20 at 3:00 p.m. in the laboratory revealed "the quality control is good for 30 days." 5. A review of the manufacturer's instructions for the controls, it was confirmed that the laboratory failed to have a mechanism in place to ensure QC was not utilized in excess of 18 times within 16 days.

D5783

CORRECTIVE ACTIONS

CFR(s): 493.1282(b)(2)

(b) The laboratory must document all corrective actions taken, including actions taken when any of the following conditions occur: (2) Results of control or calibration materials, or both, fail to meet the laboratory's established criteria for control materials, or both, fail to meet the laboratory's established criteria for patient test results obtained in the unacceptable test run and since the last acceptable test run must be reported if patient test results have been adversely affected. The laboratory must take the corrective action necessary to ensure the accuracy and reliability of reporting of accurate and reliable patient test results.

This STANDARD is not met as evidenced by:

An unannounced revisit was performed on 2/19/20 -2/21/20. *** New Deficiency Based on a review of the laboratory logs, quality control records, patient test records, and confirmed in interview, the laboratory failed to document the open dates and revised expiration dates for the AU680 chemistry analyzer. Findings were: 1. Random review of the laboratory quality control records from 6/5/19 revealed the following corrective actions for the following quality control with the following corrective actions: Multiqual level 1 6/6/19 ALP lab result 21 - changed reagent, recalibrated Multiqual Level 3 12/21/19 ALP lab result 4.65 - recalibrated and repeated Streck QC 1 10/10/19 A1c lab result 4.65 - recalibrated and QC repeated 2. Random review of the patient test logs from 6/5/19 revealed the laboratory performed ALP testing. Accession # 190605BM0018 190605BM0018 3. Random review of the patient test logs from 12/20/19 revealed the laboratory performed ALP testing.

Accession # 191220BM0002 191220BM0004 191220BM0032 4. Random review of the patient test 1 revealed the laboratory performed A1c testing. Accession # 191009BM0001 191009BM0008 191009 the laboratory records for the above dates revealed no documentation of the patient evaluation since the quality control run (the previous day) to include the above patients. 6. An interview with the technician /20 at 1440 hours in the break room hallway confirmed the above findings. He was unaware the laboratory evaluate patient test results since the last acceptable QC run.

D6033 TECHNICAL CONSULTANT-MODERATE COMPLEXITY
 CFR(s): 493.1409

The laboratory must have a technical consultant who meets the qualification requirements of 493.141 provides technical oversight in accordance with 493.1413 of this subpart.

This CONDITION is not met as evidenced by:

An unannounced revisit was performed on 2/19/20 -2/21/20 Based on review of laboratory's policy, procedure, manufacturer's instructions, verification studies, and corrective action, the technical consultant failed to provide technical oversight, as evidenced by: 1. The technical consultant failed to provide technical and scientific oversight of preanalytic systems. Refer to D6036. 2. The technical consultant failed to ensure verification studies were completed. Refer to D6040. 3. The technical consultant failed to ensure that the quality control program was established and maintained for chemistry testing. Refer to D6042. 4. The technical consultant failed to identify technical problems and ensure remedial actions were taken when their test system deviated from the laboratory performance specifications. Refer to D6043.

D6036 TECHNICAL CONSULTANT RESPONSIBILITIES
 CFR(s): 493.1413

The technical consultant is responsible for the technical and scientific oversight of the laboratory.

This STANDARD is not met as evidenced by:

An unannounced revisit was performed on 2/19/20 -2/21/20 Based on review of the manufacturer's instructions, shipping temperature studies, laboratory's shipping instructions, surveyor observation of specimens received and patient records, the technical consultant failed to provide technical and scientific oversight for preanalytic systems. Refer to D5311-C,D,F.

D6043 TECHNICAL CONSULTANT RESPONSIBILITIES
 CFR(s): 493.1413(b)(5)

(b) The technical consultant is responsible for-- (b)(5) Resolving technical problems and ensuring that corrective actions are taken whenever test systems deviate from the laboratory's established performance specifications;

This STANDARD is not met as evidenced by:

An unannounced revisit was performed on 2/19/20 -2/21/20 ***New deficiency Based on review of corrective action, and patient records, the technical consultant failed to resolve technical problems and ensure remedial actions were taken when their test system deviated from the laboratory's established performance specifications. The laboratory failed to have documentation of performing corrective actions on patient samples after the quality control run and before a failed quality control run. Refer to D5783.

D6046 TECHNICAL CONSULTANT RESPONSIBILITIES
 CFR(s): 493.1413(b)(8)

(b) The technical consultant is responsible for-- (b)(8) Evaluating the competency of all testing personnel. The staff maintain their competency to perform test procedures and report test results promptly, accurately.

This STANDARD is not met as evidenced by:

An unannounced revisit was performed on 2/19/20 -2/21/20. ** New deficiency Based on review of the laboratory personnel records, and confirmed in interview, the technical consultant failed to document competency assessments for 3 of 7 personnel performing moderately complex testing in the laboratory in 2018 and 2019. 1. Review of the laboratory policy Competency Assessment Policy (GENLAB1.1) with an approved revision. "employee competency must be assessed at six months and one year. Competency is assessed annually. Additionally, any time a method or instrument changes, employee competency will be assessed prior to the change. Review of the CMS209 revealed the laboratory had 3 of 7 personnel who performed blood specimen testing in 2018: supervisor #2 (hire date 3/1/18) Testing person #5 (hire date 11/28/18) Testing person #7 (hire date 1/1/18). Laboratory personnel records revealed no documentation of competency assessments for 2018. The technical consultant #2 performed the competency assessment for the general supervisor #2 as a testing person for all moderately complex testing in 2018. An interview with the general supervisor on 2/20/20 at 1320 hours in the break room hallway confirmed that the TC #2 performed the competency assessment but in the sister laboratory, not the current laboratory. No other competency for 2018 was documented. Review of the personnel records revealed no documentation of the 2019 accuracy assessments for 3 of 7 personnel (supervisor #5, TP#7) who performed the moderately complex blood specimen testing. 5. An interview with the general supervisor on 2/20/20 at 1330 hours in the break room hallway confirmed the above findings. He was unaware the competency assessments were not performed on site and twice in the first year and annually thereafter.
