How are the final regulations being implemented?

CMS is allowing each laboratory that it inspects to have one educational survey following the April 24, 2003, effective date of the regulations. This will give laboratories time (2 years) and the opportunity to receive the technical assistance that may be needed to meet the updated requirements.

Where can I find additional information and guidance?

Assistance for meeting the requirements is provided in Appendix C of the State Operations Manual (CMS Publication 7), which is posted on CMS's CLIA Website. Information about CLIA and links to other laboratory-related resources can be found on the following Websites:

CDC: www.phppo.cdc.gov/clia/default.asp CMS: www.cms.hhs.gov/clia/default.asp FDA: www.fda.gov/cdrh/CLIA/index.html (for a listing of waived, moderate complexity and high complexity tests)



DEPARTMENT OF HEALTH & HUMAN SERVICES



Clinical Laboratory Improvement Amendments (CLIA)

Verification of Performance Specifications Brochure #2

What is it and how do I do it?

The CLIA regulations now include a requirement for verifying the performance specifications of unmodified, moderate complexity tests cleared or approved by the FDA.

> Information to assist your laboratory in meeting this CLIA requirement!

NOTE: On January 24, 2003, the Centers for Disease Control and Prevention (CDC) and the Centers for Medicare & Medicaid Services (CMS) published laboratory regulations (CLIA) that became effective April 24, 2003. A summary of the updated requirements pertaining to performance specification verification are included in this brochure. However, this brochure is not a legal document. The official CLIA program provisions are contained in the relevant law, regulations and rulings. For more complete information, you may access the regulations on the Internet at http://www.phppo.cdc.gov/CLIA/regs/toc.asp.



BACKGROUND

The CLIA Quality System Regulations became effective on April 24, 2003. Now the laboratory is required to check (verify) the manufacturer's performance specifications provided in the package insert--for accuracy, precision, reportable range, and reference ranges--for each <u>new</u> unmodified, moderate complexity test that the laboratory performs before reporting patient test results. The verification process helps to assure that the test, when used in your laboratory by your testing personnel for your patient population, is performing as the manufacturer intended.

This requirement applies when the laboratory **REPLACES** a test system or instrument (with the same model or a different model); **ADDS** a new test; or **CHANGES** the manufacturer of a test kit.

The requirement does not apply to tests performed by the laboratory before April 24, 2003.

TIP! While the laboratory's technical consultant or director should be involved in the planning and evaluation of the performance specification checks, the test system manufacturer may also assist by providing a verification protocol and appropriate samples for the evaluation.

ACCURACY

Are your test results correct?

The laboratory needs to compare the accuracy of the test results it obtains when using a test system with the manufacturer's accuracy claims. This can be done by testing commercially available calibrators/calibration and quality control materials with known values, proficiency testing materials that have established values, and previously tested patient specimens with established values. If test results for these samples fall within the manufacturer's stated acceptable limits, accuracy is verified.

PRECISION

Can you obtain the same test result time after time?

The laboratory is responsible for verifying that it can repeatedly test the same samples on the same day, and on different days and get the same or comparable results (reproducible), regardless of which member of the laboratory's testing personnel performs the test (operator variance). Several of the laboratory's testing personnel should participate in this evaluation to help determine overall laboratory variance. Exception: For fully automated test systems that are not operator dependent, operator variance should not affect the test's precision and may not need to be evaluated by more than one person.

REPORTABLE RANGE

How high and how low can test result values be and still be accurate?

To verify the manufacturer's established reportable range for the test, choose samples with known values at the highest and lowest levels the manufacturer claims accurate results can be produced by the test system. The laboratory may only report patient test results that fall within the verified levels. The laboratory director and/or the technical consultant will need to decide how the laboratory will report results that are greater than the highest verified level or less than the lowest verified level.

REFERENCE RANGES/INTERVALS (NORMAL VALUES)

Do the reference ranges provided by the test system's manufacturer fit your patient population?

You may begin patient testing using the manufacturer's suggested reference range(s) or you may use other published reference ranges from a textbook or a journal publication. Reference ranges can vary based on the type of patient (e.g., pediatric, male, female). Over time, you may need to adjust your reference range(s) to better fit the patient population(s) you routinely test. When you test known normal patients, the results should be within your reference range and with abnormal patients, you should expect results outside the reference range.

How many samples do I need to test?

While testing 20 samples is considered the "rule of thumb" for statistical purposes, this is not a magic number. Depending on the test system and the laboratory's testing volume, the actual number of specimens needed for each part of the verification study may vary.

Once the laboratory director has reviewed and approved the results of the verification studies, the laboratory may begin using the test system for routine testing and reporting patient test results. Conversely, if the study results indicate that the test is not accurate or results cannot be consistently reproduced, the laboratory's technical consultant and the test system manufacturer should be consulted regarding steps to resolve the problem.

TIPS! With planning, verifying a test system's accuracy; precision, including operator variance; and reportable range may be performed using the same samples. For example, you may test samples with known values at the upper and lower end of the manufacturer's reportable range along with samples that are in the normal range for your patient population, in different runs, on different days, using several of the personnel who will normally perform the testing. The activities of the personnel verifying the test system will also facilitate meeting CLIA's personnel competency requirements for these employees. In addition, the laboratory director may use the verification process to meet the CLIA requirements for establishing the test system's quality control protocol, an essential component of the laboratory's overall quality system.

Where can I find additional information about the CLIA requirements pertaining to the verification of performance specifications?

You may refer to the State Operations Manual, Appendix C-Interpretive Guidelines, §493.1253, available on the CMS website at: www.cms.hhs.gov/clia.