

Today's Presenter

Earle Collum, MD, FCAP

Earle Collum MD, FCAP, is the Division Medical Director for Mid-America as well as the site medical Director for the America as well as the site medical Director for the Phoenix and Denver regional labs at LabCorp. Previously, he was the Medical Director of \$I Joseph's Hospital and Medical Center's Department of Pathology and Laboratory Medicine in Phoenix. He was also President of the Medical Staff. Dr. Collum is Board Certified in Anatomic and Clinical Pathology. He is an active member of the CAP and has performed over 200 inspections. Currently he is the chair of the CAP's Complaints and Investigations Committee. He was recognized with a CAP Lifetime Achievement award in 2017.



8 June 2020

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Today's Presenter

Richard M. Scanlan, MD, FCAP

• Richard M. Scanlan, MD, FCAP, is vice chair of clinical pathology, professor of pathology, and director of transfusion medicine at Oregon Health Sciences University (OHSU) in Portland, Oregon. He is board certified in anatomic and clinical pathology. He is actively involved in the Portland pathology community and serves as laboratory director for Planned Parenthood of Oregon. Dr. Scanlan is a CAP governor and has been active in the CAP's Laboratory Accreditation Program since 1986. Currently he is the chair of the CAP Council on Laboratory Accreditation.



8 June 2020

Objectives	
Common COVID-19 Terminology Current COVID-19 Tests Verification/validation of COVID-19 testing Quality monitoring and personnel qualifications Biosafety for COVID-19 General COVID-19 testing questions	
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What is an EUA? Legal mechanism used by the FDA Allows use of unapproved medical products during a public health emergency Used when there are no adequate, approved, and/or available alternatives

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Emergency	Use Authorization	(EUA) - cont'd.
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- · How is an EUA different that FDA-clearance or approval?
- What about laboratories outside of the US?

Laboratory-Developed Test (LDT)

- What is an LDT?
 - Test is performed by the clinical laboratory in which it was developed wholly or in part AND
 Test is neither FDA cleared/approved



Laboratory-Developed Test (LDT) - cont'd

- Is an EUA considered an LDT?
- Can my laboratory develop an LDT for COVID-19 testing?

What is the complexity of tests Prior to obtaining EUA	used for COVID-19?
o Without EUA (following FDA policy) o With EUA	
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Test Complexity cont.

- · Are there any waived tests?
- * A complete listing of EUA tests and the complexity of each is found on the <u>FDA website</u>.

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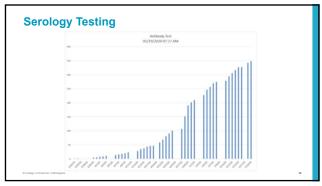
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Types of Testing

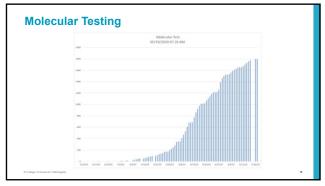
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Types of COVID-19 Testing • What types of COVID-19 tests are available? • Molecular diagnostic tests • Serological tests • Antigen detection tests * Helpful references The College of American Pathologists: Clarifying Tests for COVID-19 FDA Pollcy for Coronavirus Disease-19 Tests During the Public Health Emergency

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Test Method Validation and Verification

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Test Method Verification (COM.40300/COM.40325)

What does my laboratory need to do before using

- · Laboratories using EUA tests must verify
- Accuracy
 Precision
 Reportable Range
 Analytical Interferences



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Test Method Validation (COM.40350)

What does my laboratory need to do to develop its own test?

- Laboratories using LDTs must validate
- Accuracy
 Precision
 Reportable Range
 Specificity
 Sensitivity
 Analytical Interferences

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What does my laboratory do if there is a shortage of essential component needed to perform the testing?

- · Supply shortages have required alternatives

 - Swabs
 Transport media
 Testing materials
 Equipment

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Modifications to EUAs cont.

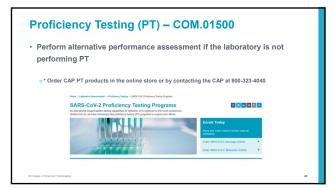
- FDA provides recommendations on alternatives in their FAQs
- · Laboratories must validate other alternatives (bridging study)



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Quality Monitoring

Does the CAP	have PT available	for COVID-19 testi	na?	
Molecular-based t		101 00 112 .0 .00.		
Serologic testing	comig			
o Antigen testing				



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Quality Control and IQCP • What type of QC does my laboratory need to do for COVID-19 testing? • Does my laboratory need to implement an IQCP for COVID-19 testing?

Quality Control and IQCP cont.

· Waived tests (authorized for the patient care setting)

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Quality Control and IQCP cont.

- · Moderate and high complexity tests
- o If manufacturer instructions define reduced external QC frequency, follow instructions no IQCP



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Nucleic Acid Contamination and Molecular Testing

 Are there other types of quality monitoring my laboratory should do for COVID-19 testing?



Nucleic Acid Contamination and Molecular Testing cont.

- · Laboratories must monitor and minimize contamination to prevent false positive results
 - o Perform wipe (environmental) tests
- Perform wipe (environmental) tests
 Monitor statistics
 Investigate any physician inquiries
 Use process controls to minimize risk of contamination
 during collection, transport, processing and storage
 Following instructions for handling waste (used test cartridges)

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Instrument/Equipment Maintenance

 What do we do if scheduled equipment maintenance was not done as scheduled due to the COVID-19 pandemic and vendors not being able to come onsite?



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Instrument/Equipment Maintenance - cont'd

- The CAP recommends the following actions:
- Create a record to document and track the issue
 Identify reasonable alternatives to complete the maintenance or perform an assessment of the affected
- equipment to determine continued use
 o Monitor continued performance through QC/function checks
- Work with vendors to complete necessary maintenance
 Retain records of the issue and resolution for at least two years

Personnel		
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Qualifications of Testing Personnel

What are the personnel qualifications to perform COVID-19 testing?

- · Personnel qualifications are based on the complexity of testing performed (GEN.54750)
- O Review the FDA Letter of Authorization for your EUA assay to determine the complexity of the testing

 Review the FDA Letter of Authorization for your EUA assay to determine the complexity of the testing

 For tests used without EUA, follow high complexity requirements

 Verify that personnel performing the test meet the minimum qualifications defined in GEN.54760 based on test complexity

 Maintain personnel training records to perform the test

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Specimen Collection Personnel Qualifications

- Who is qualified to collect specimens for COVID-19 testing?
- There are no defined qualifications in the CAP checklists or CLIA regulations
 - Follow state-specific qualifications, as applicable
 - Train personnel to ensure adequacy of the specimen collected and safety of the procedure (for the patient and employee)

Biosafety	
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Personal Protective Equipment (PPEs)

 What precautions should be used when collecting specimens from suspected or confirmed COVID-19 patients?



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Personal Protective Equipment (PPEs) cont.

- For specimen collection, CDC recommends: o N95 or higher-level respirator (or face mask if respiratory is not available)

 Eye protection

 Gloves

 Gown

Personal Protective Equipment (PPEs) cont.

 What precautions should be used when handling/testing specimens from suspected or confirmed COVID-19 patients?



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Personal Protective Equipment (PPEs) cont.

- · For handling/testing, CDC recommends
- Standard precautions including gloves, lab coat/gown, eye protection
 For procedures with a high likelihood to generate droplets or aerosols
 Surgical mask/face shield
 Other physical barriers

 - Centrifuge covers/caps Biologic safety cabinets

* Visit the CDC website for the most current guidance

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Q & A'S on COVID-19 Testing

Recommended Testing

- Does the CAP recommend any specific COVID-19 testing for my laboratory setting?

 - o 1) test volumes
 o 2) turn around times needed
 - o 3) current testing platforms in use within your laboratory

 - 4) testing personnel qualifications
 5) PPE and biosafety measures available for staff
 6) availability of supplies to begin and maintain patient testing

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Pooling of Samples

- Can my laboratory perform testing on pools of specimens for COVID-19 molecular-based testing?
- * Contact the FDA Division of Microbiology for additional information on regulatory approval for modifying an EUA o (301) 348-1778 o CDRH-EUA-Templates@fda.hhs.gov

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Reporting of Results for Multiple **Platforms**

 My laboratory is using three different instrument platforms for COVID-19 molecular testing and each uses different reporting language. We use the same reportable result for all three platforms?



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We have two different instruments for COVID-19 EUA molecular testing.
 The manufacturer's instructions for one includes the use of nasopharyngeal swabs and nasal swabs. The other only includes nasopharyngeal swabs. Can we validate the second test to allow the use of nasal swabs on both instruments?

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Transporting and Shipping Specimens

- How should suspected or confirmed COVID-19 specimens be transported within a facility?
- What are the requirements for packaging and shipping specimens from suspected or confirmed COVID-19 patients?

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Temporary Suspension of Testing

• Due to the COVID-19 pandemic, my laboratory temporarily suspended some of its testing. What do we need to do restart it?

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Are specific disclaimers required on reports for EUA COVID-19 tests?

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Competency Assessment

- With the current challenges due to the public health crisis, is any leniency being given to performing competency assessment?
- How can we perform direct observation with social distancing?



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New Reagent Lot Testing

- My laboratory has two identical instruments for COVID-19 testing. Do we need to do new reagent lot testing on both?
- If my laboratory has the same instrument as our satellite laboratory, can we QC the new lot and send it to the other site to use also?

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Problems with EUA Test	Pro	bΙι	ems	wit	h F	IJΑ ·	Test	9
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 What actions should my laboratory take if we notice problems with the EUA test it is using, such as complaints from physicians about false positives or negatives?

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Laboratory Director Sign Off

 My laboratory director has been unable to come into the laboratory to sign off on proficiency testing, test validation/verification studies, and other items. Can we obtain the signature electronically?



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Missed/Delayed Duties

 Because some staff were furloughed or unable to come to work, there are some instances where my laboratory missed performing required duties (eg, instrument maintenance, PT, method comparison) or performed them later than required. Will my laboratory be cited during our next inspection?

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- My laboratory's CAP inspection window is due to open in August 2020, should we expect any delays?
- My laboratory's anniversary date was in May 2020 and we have not had our inspection yet. Are we still considered CAPaccredited?



Direct to Consumer Testing (DTC)

Can we perform DTC for COVID-19 testing?

State by State

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Workplace or Corporate Testing

Can we test for a corporation and report results back to its HR department?



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