# Cytology Update

#### Centers for Medicare & Medicaid Division of Laboratory Services September 20, 2006





2005 National Cytology Proficiency Testing Results

**Initial Testing Event** 

 Totals
 Scored 90%
 Did Not Score 90%

 12,831
 11,654 (91%)
 1,177 (9%)





2005 National Cytology Proficiency Testing Results Initial Testing Event

<u>Type</u>	Scored 90%	Did Not Score 90%
СТ	6,083 (93%)	447 (7%)
Pri MD	312 (67%)	<b>156 (33%)</b>
Sc MD	5,242 (90%)	570 (10%)
LT	17 (80%)	4 (20%)





Cytology Proficiency Testing 2006 Preliminary Data

#### **Initial Testing Event**

# TotalsScored 90%Did Not Score 90%5,9475,663 (95%)284 (5%)





### Cytology Proficiency Testing 2006 Preliminary Data

#### **Initial Testing Event**

<u>Type</u>	<u>Scored 90%</u>	Did Not Score 90%
СТ	2,984 (96%)	134 (4%)
Pri. MD	222 (89%)	27 (11%)
Sec. MD	2,450 (95%)	123 (5%)
LT	7 (100%)	0 (0%)





## Specialized Reviews of Cytology Laboratories





#### **Statutory Authority**

" standards requiring periodic inspection of cytology services by persons capable of evaluating the quality of cytology services."





## **Laboratory Selection**

- Complaints
- Nominations
- Random





## **Survey Team Composition**

- Project Director/Technical Director
- Survey Team Leader
- Survey Team Members
- On-Call Cytopathologist
- CMS Project Officer





## Survey Process

- Laboratory Selection
- Contractor Notification
- Survey Team Development
- Laboratory Notification





#### **Survey Process (Continued)**

- On-Site Survey
- Statement of Deficiencies (2567)
  - Standard Level
  - Condition Level
  - Immediate Jeopardy
- Plan of Correction (POC)





#### Enforcement

Principal Sanctions

- Suspension
- Limitation
- Revocation





## **Enforcement (Continued)**

**Alternative Sanctions** 

Directed Plan of Correction

- On-site Monitoring by State
- Civil Money Penalty





## Appeals

- Administrative Law Judge Hearing (ALJ)
- Departmental Appeals Board





#### **Civil Action**

U.S. District Court

 Temporary Injunction
 Restraining Order





## **Criminal Sanctions**





## Laboratory Registry





Specialized Review of Cytology Laboratory Survey Findings

July 1988-August 2006





#### **# Laboratories Surveyed**

#### Laboratories Surveyed: 616

#### Independent Laboratories: 520 Hospital Laboratories: 96





**# Surveys Performed** 657 **Surveys Performed: Routine:** 346\* **Complaint:** 158\* 30 **Revisit: Focus:** 39

\* Data not tracked on 84 laboratories from 7/88 through 9/92

## **Additional Information**

**# Laboratories Surveyed** 616 **# Laboratories With Condition** 199 **Level Deficiencies** # Laboratories Sanctioned by CMS 11 **# Laboratories Terminated from** 7 **CLIA Program # Laboratories Voluntarily Withdrew** 5 from CLIA Program





# Comparison # Laboratories Surveyed

#### 07/88-09/02

10/40-8/06

 # Labs Surveyed:
 533
 83

 Ind. Labs:
 448 (84%)
 72 (86%)

 Hospital Lab:
 85 (16%)
 11 (13%)





#### Comparison # Surveys Performed

7/88-9/02			10/04-8/06
<b>Surveys Perfor</b>	med:	569	88
Routine:	282*	(50%)	<mark>64 (73%)</mark>
Complaint:	139*	(24%)	<b>19 (22%)</b>
Revisit:	29	(5%)	1 (1%)
Focus:	35	(6%)	4 (5%)

\* Data not tracked on 84 laboratories from 7/88 through 9/92





## Comparison of Additional Information

7/8	7/88-9/02	
# Labs Surveyed	<b>533</b>	83
# Labs With Condition	184 (35%)	15 (18%)
Level Deficiencies		
# Labs Sanctioned by CMS	11 (2%)	0 (0%)
# Labs Terminated from CLIA Program	6 (1%)	1 (1%)
# Labs Voluntarily Withdrew	3 (<1%)	<mark>2 (2%)</mark>
from CLIA Program		





## Thank You!



