
	Grossing by Non-Pathologists in Surgical Pathology	Dept:	Pathology
		Effective Date:	2/18
		Revised Date:	8/2018
		Contact:	Pathology Department Chair
Name & Title: Gregory Pomper, MD, Medical Director of Clinical Laboratories			
Signature: 		Date:	2/21/16

1) General Policy Statement:

It is the policy of Wake Forest Baptist Medical Center (WFBMC) Pathology Department to define the situations and limitations by which individuals other than pathologists may perform surgical pathology gross examination, description and dissection of human tissues received in the pathology laboratory.

- a) **Scope:** This policy applies to all Non-pathologists who perform such tasks do so under the supervision of a qualified pathologist. Such personnel will meet the training and educational requirements as delineated by Joint Commission and Clinical Laboratory Improvement Amendments (CLIA).
- b) **Responsible Department/Party/Parties:**
 - i. Procedure owner: Department of Pathology Medicine
 - ii. Procedure: Department of Pathology Medicine
 - iii. Supervision: Department of Pathology Chair and Department of Pathology Administrative Director.
 - iv. Implementation: Department of Pathology Chair and Department of Pathology Administrative Director

2) Definitions:

- a) **WFBMC:** Wake Forest Baptist Medical Center and all affiliated organizations including Wake Forest University Health Sciences (WFUHS), North Carolina Baptist Hospital (NCBH), all on-site subsidiaries as well as those off-site governed by WFBMC policies and procedures.
- b) **Policy:** As defined in the Policy on Creating and Amending Policy, a statement of principle that is developed for the purpose of guiding decisions and activities related to governance, administration, or management of care, treatment, services or other activities of WFBMC. A policy may help to ensure compliance with applicable laws and regulations, promote one or more of the missions of WFBMC, contain guidelines for governance, and set parameters within which faculty, staff, students, visitors and others are expected to operate.

3) Policy Guidelines:

A. Duties and responsibilities

1. Personnel performing the tasks as described in this policy must be knowledgeable of all gross room procedures.
2. Laboratory Technologist personnel may only perform gross examination, description and dissection on the following specimen types that are small and require minimal sectioning, after initial training and direct supervision has been completed and they have been deemed competent:
 - Biopsies
 - Skin biopsies
 - Hardware
 - Gross only specimens
 - Tonsils
 - Gallbladder
 - Appendix
 - Fallopian tubes for sterilization
 - Vas deferens for sterilization
 - Sinus /septal contents
 - Products of conception
 - Hemorrhoids
 - Hernia sac / hydrocele
 - Bladder and prostate TUR
3. Pathology assistants can perform gross examination, description and dissection of all types of specimens received in the pathology laboratory, after initial training and direct supervision has been completed and they have been deemed competent.
4. Pathology residents should acquire basic grossing skills during the first several weeks on their first surgical pathology rotation. As they progress in their training under the direct supervision of pathology assistants, surgical pathology fellows and pathologists, the list of specimens they are allowed to handle independently will be modified appropriately.

B. Orientation and Training

1. Training of staff will be the responsibility of pathology assistant, surgical pathology fellows, pathologists and upper level residents that have attained high level grossing skills.
2. Prior to working independently, all grossing personnel must have been signed off and successfully completed all tasks as listed on the **Non-Pathologist Grosser**

Training Record form. Full training may not be completed immediately upon hire. Training may be ongoing as specimen samples become available. Ongoing dates of direct observation of grossing of specimen samples will be noted on the training document.

3. Laboratory Technologist staff will always be under the supervision of a pathologist or a pathologist assistant. Once the staff member has successfully handled at least 3 examples of each specimen listed on the **Technologist Surgical Pathology Gross Room Direct Supervision and Competency Form** under direct supervision, the staff member will be allowed to independently handle that particular type of surgical specimen.
4. After competency has been attained, Pathology assistants will work independently but will a pathologist is always available for consultation.
 - a. Successful demonstration of basic grossing skills requires documentation of at least 3 specimens for each organ system including at least 1 of each specimen listed on the **Surgical Pathology Basic Gross Room Direct Supervision and Competency Form**.
 - b. Documentation of complex specimens handled under direct supervision by a pathology assistant, surgical pathology fellow or pathologist will be kept by the person undergoing competency training. It is their responsibility to have the form initialed in the appropriate places. Completed forms will be kept in the employee or resident file (see **Surgical Pathology Advanced Gross Room Direct Supervision and Competency Form**). Once the pathologist assistant has successfully handled under direct supervision at least 3 examples of each specimen listed on this form, the pathologist assistant will be allowed to independently handle that particular type of complex surgical specimen.
5. Pathology residents will be supervised on a daily basis by a pathologist assistant and/or a pathologist who will ensure proper technique. Upper level pathology residents that have attained high level grossing skills can also be available for supervision. Even after competency has been attained a pathologist assistant or pathologist is always available for consultation.
 - a. Successful demonstration of basic grossing skills requires documentation of at least 3 specimens under each organ system including at least 1 of each specimen listed on the **Surgical Pathology Basic Gross Room Direct Supervision and Competency Form**. Documentation requires direct observation of grossing activities by pathology assistant, surgical pathology fellow or pathologist. Successful demonstration allows the resident to handle many common specimens.
 - b. High level grossing skills will be acquired over the course of the residency as they are exposed to more complex surgical specimens. During the course of

their training, documentation of complex specimens handled under direct supervision by pathology assistant, surgical pathology fellow or pathologist will be kept by the person undergoing competency training. It is their responsibility to have the form initialed in the appropriate places. For the residents the form will be reviewed at the end of each rotation by the Director of Surgical Pathology or Rotation Director. Completed forms will be kept in the employee file (see **Surgical Pathology Advanced Gross Room Direct Supervision and Competency Form**). The pathologist of record will provide final assessment at the time of slide review. Once the resident has successfully handled at least 3 examples of each specimen listed on this form under direct supervision, the resident will be allowed to independently handle that particular type of surgical specimen.

- c. The progression of pathology resident grossing skills is under periodic review by the Residency Program Coordinator.

C. Performance Evaluation

Evaluation of performance is ongoing as casework is always reviewed by the pathologist.

D. Competency Assessment

1. After initial training is completed, competency assessments will occur at 6 months from the initial training and then again at the end of the first year. Competency assessments will occur on an annual basis thereafter.
 2. Competency Assessments will be documented using the *Competency Assessment of Non-Pathologist Grosser Form*.
 3. Training records and competency assessments will be maintained in the laboratory employee's personnel file.
 4. Competency assessment of non-pathologist grossers will be performed by board certified surgical pathologists and discussed with the Director of Surgical Pathology.
 5. A corrective action plan tailored to the specific deficiencies found and the personnel responsibilities will be develop if needed.
- 4) Review/Revision/Implementation:**
- a) **Review Cycle:** This policy shall be reviewed by the Pathology Leadership every two (2) years from the effective date.
 - b) **Office of Record:** The Department of Pathology.

5) Related Policies: N/A

6) References, National Professional Organizations, etc.:

Curriculum Content and Evaluation of Resident Competency in Anatomic Pathology. A Proposal. Association of Directors of Anatomic and Surgical Pathology. Am J Clin Path 2003; 120:652-660.

7) Attachments:

Attachment A - Non-Pathologist Grosser Training Record

Attachment B -Technologist Surgical Pathology Gross Room Direct Supervision and Competency Form

Attachment C - Surgical Pathology Basic Gross Room Direct Supervision and Competency Form

Attachment D - Surgical Pathology Advanced Gross Room Direct Supervision and Competency Form

Attachment E - Competency Assessment of Non-Pathologist Grosser Form

8) Revision Dates:

2/18, 8/18

Non-Pathologist Grosser Training Record:

Employee: _____ Qualifications verified: _____ Y / N

Trainer: _____ Date initiating Training: _____

General:	Trainer	Employee
• Physical and Health hazards associated with materials and reagents used in grossing area (Formalin, Sharps)		
• Precautions, Safety procedures, Environmental controls		
• Disposal procedures		
• Clean-up procedures		
• Supplies and area maintenance procedures		
• PPE requirements		
Specimen handling:		
• Specimen labeling requirements		
• Deficiency Log documentation		
• Accessioning procedures, labeling of containers, requisition and cassettes		
• Specimen Case log		
• CoPath Dragon Training		
• Case Specimen-Block Integrity		
• Review Specimen Part Types		
Review sample biopsy gross descriptions		
Demonstrate / Observe gross for specimen types:		
<i>Pathology Assistant / Pathology Resident</i>		
• Basic Gross Room Direct Supervision and Competency Form completed and signed		
<i>Medical Technologist</i>		
• Medical Technologist Gross Room Direct Supervision and Competency Form		

Comments (date): _____

Completed training satisfactorily: _____ Yes _____ No _____ Date Training Completed: _____

Trainer signature: _____ Employee signature: _____

Name: _____

Technologist Surgical Pathology Basic Gross Room Direct Supervision and Competency

	Instructor Observation		Direct Supervising of Grossing		Dictation Reviewed		Direct Supervising of Grossing		Dictation Reviewed	
	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #
Head and Neck Pathology										
Biopsy, upper airway/oral cavity										
Tonsils and/or adenoids										
Tongue biopsy										
Sinus contents										
Pulmonary/Cardiothoracic Pathology										
Transbronchial biopsy										
Gynecologic Pathology										
POC/fetal tissue										
Cervix biopsy										
Endometrial curettage/biopsy										
Endocervical curettage/biopsy										
Fallopian Tubes for Sterilization										
Dermatopathology										
Skin ellipse										
Punch biopsy										
Shave biopsy										
Gastrointestinal										
Mucosal biopsy										
Hemorrhoids										
Appendix										
Hepatobiliary										
Liver needle biopsy										
Gallbladder										

Name: _____

Technologist Surgical Pathology Basic Gross Room Direct Supervision and Competency

	Instructor Observation		Direct Supervising of Grossing		Dictation Reviewed		Direct Supervising of Grossing		Dictation Reviewed	
	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #
Genitourinary										
Prostate biopsy										
TURBT/TURP										
Bladder biopsy										
Vas deferens for sterilization										
General Surgical Path/Bone/Soft Tissue										
Foreign bodies/Medical devices/gross										
Hernia sac										
Breast Pathology										
Core biopsy										

Comments:

Trainer Signature _____

Trainee Signature _____

Lab Medical Director/Designee _____

Date: _____

Surgical Pathology Basic Gross Room Direct Supervision and Competency

LEVEL 1 Basic	Instructor Observation		Direct Supervising of Grossing		Gross Dictation Reviewed		Direct Supervising of Grossing		Gross Dictation Reviewed	
	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #
Head and Neck Pathology										
Biopsy, upper airway/oral cavity										
Tonsils and/or adenoids										
Tongue biopsy										
Local excision with margins										
Sinus contents										
Pulmonary/Cardiothoracic Pathology										
Transbronchial biopsy										
Wedge resection										
Lobectomy										
Gynecologic Pathology										
Cervix biopsy										
Endometrial curettage/biopsy										
Endocervical curettage/biopsy										
Benign hysterectomy										
Cone										
LEEP										
Dermatopathology										
Skin ellipse										
Punch biopsy										
Shave biopsy										
Excision										
Excision w/designation										
Skin cyst										
Lipoma										
Gastrointestinal										
Mucosal biopsy										
Appendix										

Surgical Pathology Basic Gross Room Direct Supervision and Competency

LEVEL 1 Basic	Instructor Observation		Direct Supervising of Grossing		Gross Dictation Reviewed		Direct Supervising of Grossing		Gross Dictation Reviewed	
	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #
Hepatobiliary										
Liver needle biopsy										
Gallbladder										
Genitourinary										
Prostate biopsy										
TURBT/TURP										
Bladder biopsy										
Bladder tumor										
Kidney biopsy										
General Surgical Path/Bone/Soft Tissue										
Foreign bodies/Medical devices/GO										
Hernia sac										
Toe amp/transmetatarsal amp										
Breast Pathology										
Core biopsy										
Lumpectomy										

LEVEL 1 Basic: Basic grossing skills which should be acquired during PSTC and/or first several weeks on first surgical pathology rotation. Successful demonstration of competency at grossing Level 1 requires documentation of at least 3 specimens under each organ system including at least 1 of each listed specimen. Documentation requires direct observation of grossing by fellows/PA/faculty and review of dictation with fellow or pathologist is recommended. Successful demonstration allow resident/PA/grossing tech to function with indirect supervision (ACGME Level 2a supervision physician on site and available) and successfully handle many common specimens. Resident and/or fellow will sign to confirm completion of Level 1 below. Form reviewed at annual evaluation meeting to confirm completion.

Comments:

Trainer Signature _____

Trainee Signature _____

Lab Medical Director/Designee _____

Date: _____

Surgical Pathology Advanced Gross Room Direct Supervision and Competency

Advanced	Instructor Observation		Direct Supervising of Grossing		Gross Dictation Reviewed		Direct Supervising of Grossing		Gross Dictation Reviewed		Direct Supervising of Grossing		Gross Dictation Reviewed	
	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #
Head and Neck Pathology														
Thyroidectomy														
Parathyroidectomy														
Laryngectomy (with neck dissection)														
Glossectomy														
Mandibulectomy (with neck dissection)														
Parotidectomy/other salivary glands														
Complex/composite resections														
Pulmonary/Cardiothoracic Pathology														
Pneumonectomy														
Thymectomy														
Gynecologic Pathology														
Placenta														
POC/fetal tissue														
Cold knife (one biopsy)														
TAH-BSO for endometrial cancer														
TAH-BSO for ovarian carcinoma														
Radical hysterectomy														
Vulvectomy														
Pelvic exenteration														
Dermatopathology														
Wide local excision/re-excision														
Breast Pathology														
Modified radical mastectomy														
Genitourinary														
Prostatectomy														
Cystectomy														
Partial nephrectomy														
Radical/complete nephrectomy														
Kidney biopsy														
Orchiectomy														
Adrenalectomy														

Surgical Pathology Advanced Gross Room Direct Supervision and Competency

Advanced	Instructor Observation		Direct Supervising of Grossing		Gross Dictation Reviewed		Direct Supervising of Grossing		Gross Dictation Reviewed	
	Date	Case #	Date	Case #	Date	Case #	Date	Case #	Date	Case #
General Surgical Path/bone/soft tissue										
Lymph node biopsy including lymphoma workup										
Splenectomy										
Below knee amputation										
Soft tissue sarcoma resection										
Bone resection for sarcoma										
Gastrointestinal										
EMR										
Esophagectomy										
Gastrectomy										
Small/large bowel resection for benign										
Small/large bowel resection for malignant										
Distal colectomy/proctectomy										
Hepatobiliary										
Pancreaticoduodenectomy (Whipple)										
Distal pancreatectomy										
Wedge resection/partial hepatectomy										

Medical Director/Designee _____ Trainee Signature _____

Residents:
These higher level grossing skills which will be acquired over the course of the residency.
Depending on resident experience level, direct supervision may be needed for the first specimen encountered.

Reviewed at annual evaluation meeting Year 1 _____ Year 2 _____ Year 3 _____

Reviewed at end of surg path rotations
 1 _____ 4 _____
 2 _____ 5 _____
 3 _____ 6 _____

Employee: _____

	Required Competencies	Example of Specific tests/ records reviewed	Competencies Met? Y/N	Date	Reviewer's Initials
Direct observation of test performance	<ul style="list-style-type: none"> Verify case integrity Appropriate measurements Documents on log sheet Notes fragment number on cassettes for biopsy Enters correct blocks/protocol in Histology module 	Observe a minimum of 3 surgical specimens, including at least a complex one. List below type of specimens reviewed: <ol style="list-style-type: none"> 			
Monitor Test Result Recording	<ul style="list-style-type: none"> Dictation accurately represents specimen count/size 				
Review of worksheets & maintenance records	<ul style="list-style-type: none"> Routinely completes logs as required 	<input type="checkbox"/> Specimen Block log			
Direct observation of instrument maintenance	<ul style="list-style-type: none"> Maintains work area and supplies 				
Assessment of Test Performance	<ul style="list-style-type: none"> Histology slide correlates with dictated specimen count/size 	Specimens reviewed <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			
Assessment of Problem-Solving	<ul style="list-style-type: none"> Appropriately handles multiple fragment specimens Selects appropriate sections 	Specimens reviewed <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>			

Competency has been satisfactorily demonstrated: _____ Yes _____ No

 Reviewer's Comments: _____

Corrective Action: _____

Reviewer's Name: _____ Reviewer's Signature: _____ Date: _____

Lab Director/Designee: _____ Date: _____