


6P 1/16/19

 Wake Forest Baptist Medical Center	<b>Documentation of Foreign Equivalency for Laboratory Testing Personnel LabAdmin 3 (Formerly Lab Admin 11)</b>	<b>Dept:</b>	<b>Pathology</b>
		<b>Effective Date:</b>	<b>November 2013</b>
		<b>Revised Date:</b>	<b>May 2016</b>
		<b>Contact:</b>	<b>Laboratory Compliance, QA, and Safety</b>
<b>Name &amp; Title: Gregory Pomper, MD</b>		<b>Date: 3/6/17</b>	<b>May 5, 2016</b>
<b>Signature: Signature on file</b>		<i>GP</i>	

**1) General Procedure Statement:**

- a. **Scope:** WFBH personnel who perform moderate or high complexity laboratory and/or point-of-care testing must meet CLIA requirements for "Testing personnel qualifications": 42CFR493.1423. Personnel with a diploma from a foreign country (Non-US) must have an evaluation of their credentials determining equivalency of their education to education obtained in the United States (US). The equivalency evaluations may be performed by a nationally recognized organization.
- b. **Responsible Department/Party/Parties:**
  - i. Procedure owner: Department of Pathology
  - ii. Procedure: WFBMC Human Resources and Department of Pathology
  - iii. Supervision: Constance Amos
  - iv. Implementation: Constance Amos

**2) Definitions:**

- **Point-of-Care Testing (POCT)**—defined as tests designed to be used at or near the site where the patient is located, that do not require permanent dedicated space, and that are performed outside the physical facilities of the clinical laboratory. **Point-of-Care** abbreviated as **POC** in this document.
- **Clinical Laboratory Improvement Amendments (CLIA)**—United States federal regulatory standards that apply to all laboratory testing performed on humans.
- **C. Equivalency—**

§493.2 Definitions.

As used in this part, unless the context indicates otherwise--

**Accredited institution means a school or program which--**

- (a) Admits as regular student only persons having a certificate of graduation from a school providing secondary education, or the recognized equivalent of such certificate;
- (b) Is legally authorized within the State to provide a program of education beyond secondary education;
- (c) Provides an educational program for which it awards a bachelor's degree or provides not less than a 2-year program which is acceptable toward such a

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- (c) Provides an educational program for which it awards a bachelor's degree or provides not less than a 2-year program which is acceptable toward such a degree, or provides an educational program for which it awards a master's or doctoral degree;
- (d) Is accredited by a nationally recognized accrediting agency or association.

This definition includes any foreign institution of higher education that HHS or its designee determines meets substantially equivalent requirements.

Interpretive Guidelines §493.2(d)

**HHS has determined that Foreign academic credential evaluation may be performed by any nationally recognized organization. Equivalency evaluations may be performed by these organizations and their affiliates. Such organizations may include the National Association Credential Evaluation Services, Inc. (NACES) (<http://www.naces.org/>) and the Association of International Credential Evaluators, Inc. (AICE) (<http://www.aice-eval.org>) or telephone (310) 550-3305. The Internet may also be searched for other such nationally recognized organizations and affiliates.**

A nationally recognized accrediting agency or association, recognized by the Secretary means a school or program that is approved by:

- The Council of Medical Education of the American Medical Association (AMA). AMA schools are listed in the Allied Medical Education Directory and may be obtained from the AMA Order Department at 515 North Dearborn Chicago, Illinois 60610;
- One of the eight Regional accreditation programs [commission] listed in the latest edition of Education Directory that can be obtained from the U.S. Department of Education at <http://www.ed.gov> or by telephone at 1-800-872-5327;
- New York Board of Regents (<http://www.nysed.gov>) or by telephone at (518) 474-5844;
- National Institutional and Specialized Accrediting Bodies includes the Accrediting Bureau of Health Education schools. The web address is: [www.abhes.gov](http://www.abhes.gov) or by telephone at (703) 917-9503.

Individuals qualify by obtaining the appropriate degree after completing the academic requirements and training in an accredited school at a time when the school is accredited. If there is any question about the accreditation status of the school, contact the accrediting agency involved.

If there is an issue concerning the confirming of a particular degree by an institution, contact the school involved for a decision.

States have varying degrees of control over education. However, there are several associations of regional or national scope that provide assistance pertinent to identifying accredited institutions and educational programs.

**Personnel that perform tests of moderate and/or high complexity in a CLIA certified laboratory must meet specific education, training, and experience requirements. Individuals who attended foreign schools must have an evaluation of their credentials determining equivalency of their education to education obtained in the United States (US). The equivalency evaluations may be performed by a nationally recognized organization.**

**3) Procedure:**

- A. Personnel that perform tests of moderate complexity in a WFBMC CLIA certified laboratory must have earned at least a high school diploma or equivalent (42CFR493.1423(4)(i)). A degree higher than a high school diploma is acceptable.
- B. Personnel that perform tests of high complexity in a WFBMC CLIA certified laboratory must have earned at least an associate degree in Laboratory Science or Medical Laboratory Technology from an accredited institution or equivalent laboratory training.
- C. Individuals who attended foreign schools must have an evaluation of their credentials determining the equivalency of their education to a United States (US) education. Documentation must be approved by laboratory compliance prior to performing any patient testing. The equivalency evaluation may be performed by a nationally recognized organization.
- D. Laboratory will:
  - 1. Determine the test complexity the individual is authorized to perform; and
  - 2. Provide this information to Human Resources when requested
  - 3. Perform and maintain competency documentation
- E. Human Resources will:
  - 1. Verify and file documentation of high school diploma or equivalent for moderately complex testing personnel.
  - 2. Verify and file documentation of degree in Lab Science or Medical Laboratory Technology from an accredited institution or equivalent for high complexity testing personnel.
  - 3. Verify that if a staff member received education outside of the United States and is to perform moderate or high complexity testing, additional verification of education equivalency is performed and filed.

- 4) **Review/Revision/Implementation:**
  - a) **Review Cycle:** This policy shall be reviewed by Department of Pathology at least every two years from the effective date.
  - b) **Office of Record:** After authorization, the Legal Department shall house this policy in a policy database and shall be the office of record for this policy.
  
- 5) **Related Policies:**  
N/A
  
- 6) **References, National Professional Organizations, etc.:**
  - a. CLIA Laboratories Performing Moderate Complexity Testing - 493.1423(4)(i).
  - b. CLIA Subpart A—General Provisions, 493.1 – 493.2
  - c. CAP standards—Lab General GEN.54400 and GEN.54750
  
- 7) **Attachments:**  
N/A
  
- 8) **Revision Dates:**  
11/13, 5/16

To whom it may concern:

I have reviewed and authorize the Documentation of Foreign Equivalency for Laboratory Testing Personnel policy.

  
\_\_\_\_\_  
Signature

  
\_\_\_\_\_  
Date

Dr. Gregory Pomper  
Medical Director – Clinical Laboratories  
Wake Forest Baptist Medical Center