AMERICAN SOCIETY FOR CYTOTECHNOLOGY

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Clinical Laboratory Improvement Advisory Committee

Public Comment- February 14, 2012

Workload Recommendation
On Automated Pap Test Screening

ASCT Supports

- Workday for a cytotechnologist should include no more than 7 hours of Pap test screening in a 24 hour period.
- Reduction in workload maximum,
  - 100 slides/24 hour is too high for automated GYN screening and a reduction to 70 slides/day (CMS/FDA requirements for calculating workload) may be more appropriate.
- Future workload studies should specifically define and then utilize actual *screening* hours.
- Multiple quality indicators, not limited to productivity, should be utilized to assess performance and set individual cytotechnologist's workload.

Further evidence needed as a basis for modernization of the regulation

- Conduct a comprehensive study to reflect the varied work settings in which cytology is performed, including the slide volume associated with Non-GYN specimens and non-automated GYN screening.
- Establish more accurate parameters for recording actual screening hours and to capture the non-screening time inherent in the work environment such as data entry and rest breaks.
- Allow flexibility to incorporate new technology as it emerges.
  - The100/24 hours regulation was implemented at a time when automated screening and much of the data entry and technology now utilized by cytotechnologists was not in existence.

Technical Supervisor (Laboratory Director)

Sec. 493.1274 Standard: Cytology

(1) The **technical supervisor** establishes a maximum workload limit for each **individual** who performs primary screening.

(i) The workload limit is based on the individual's **performance**

(ii) Each individual's workload limit is reassessed at least every **6 months** and adjusted when necessary.

(2) The maximum number of slides examined by an individual in each **24-hour period does not exceed 100 slides**. This limit represents an absolute maximum number of slides and must **not** be employed as an individual's **performance target.**

(3) The laboratory must maintain records….

(4) Records are available to document the workload limit for each individual.

http://wwwn.cdc.gov/clia/regs/subpart_k.aspx#493.1274

Cytology Workload is a Complex Issue

1. **Regulation**

Evidence Based & Relevant

2. **Compliance**

Enforcement & Accountability

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Thank You