

Would the committee please consider the use of remote video conferencing software as an acceptable substitute for in person direct observation for competency assessment? Many smaller moderate complexity labs, such as physician offices, surgical centers, and stand-alone ER's do not have the personnel or lab directors who qualify to be a technical consultant. Instead, they may hire a technical consulting firm to assist with the duties of a technical consultant. With the use of compliance software programs, the QC and documentation reviews can be reviewed remotely by consultants that are not local or even in the same state. The cost of travel and airfare can be a burden on these small facilities, especially with the high turnover of personnel, to have a technical consultant on site to perform each competency within the required timeframe.

By using video conferencing, the consultant can observe the entire process from preanalytical – post analytic live and interact with the testing personnel as if they were physically in the lab. Physicians are approved to do remote visits under certain circumstances. I would like to propose that this technology also be approved for the laboratory.

Thank you in advance for considering

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