

Technical Requirements and CLSI Guidelines for Laboratory Test Method Life Phases
Updated June 2021 from presentation at the 2019 American Association for Clinical Chemistry Annual Meeting
“Using CLSI Guidelines to Meet quality requirements established by FDA, CLIA, and ISO
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	Phases	Activity	REQUIREMENTS				CLSI GUIDELINES**
			FDA QSR ¹	CLIA ²	NYS ^{3*}	ISO ⁴⁻⁸	
Establishment	1. Feasibility and Design		21 CFR 820.30		QMS FS; S1-S7 Director: DR FS; S1-S5 Human Resources: HR FS; S1-S10	ISO 9001:2015 Clauses: 8.2.1, 8.2.2, 8.2.3, 8.3.1 through 8.3.6	General: EP12, QSRLDT Process Management: EP19, QMS13 Documents: QSRLDT, QMS02
	2. Development	General	820.30, 820.50, 820.181, 820.40, 820.60, 820.65		Facility: FD FS; S1-S3 Safety: LS FS; S1-S17 Resources: RM FS; GRM S1-S7 Equipment LEI S1-S9 Reagents: RGM S1-S5 QC S1	ISO 9001:2015 Clauses 8.3.1 through 8.3.6 ISO 13485:2016 Clauses 7.1 through 7.3	Facilities: QSRLDT Suppliers: QSRLDT, QMS21 Equipment: QSRLDT, QMS01, QMS13, AUTO08 Process Management: EP19, QMS18, QSRLDT, EP23, EP12 Documents: QMS13, QMS26, QSRLDT
		Risk Analysis, Evaluation, and Control		493.1253(b)(3) & c, 493.1256	QC S2	ISO 14971:2019 ISO 17025:2017 Clause 8.5 ISO 22367:2020	EP18, EP21
	3. Validation	General	820.30, 820.75, 820.86	493.1253(a), 493.1253(b)(2), 493.1253(b)(2)(vii), 493.1253(c), 493.1254(b)	Test Performance Specifications: TPS S2-S4	ISO 13485:2016 Clauses 7.5, 7.6 ISO 17025:2017 Clause 7.2.2 ISO 15189:2012 Clauses 5.5.1.1, 5.5.1.3, 5.5.1.4, 5.5.2	General: EP19, QMS18 Process Management: EP19, QMS18 Documents: QMS02, QMS26, QSRLDT Process Management: EP12 NCE Management: QSRLDT Assessment: QSRLDT
		Precision			Calibration: CAL S1-S2		EP05
		Accuracy		493.1253(b)(2)(i) & c			EP09
		Measuring Interval		493.1253(b)(2)(v) & c			EP06, EP34
		Reference Interval		493.1253(b)(2)(vi) & c			EP28
		Detection Capability		493.1253(b)(2)(iii) & c			EP17
		Analytical Specificity		493.1253(b)(2)(iv) & c			C56, EP07, EP37
	Clinical Validation			EP24, EP27			
	Reagent/Sample Stability		493.1253(b)(3) & c, 493.1256	EP25			
TRANSFER TO IMPLEMENTATION							

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			FDA QSR	CLIA	NYS	ISO	
Implementation	4. Preliminary Evaluation		820.30 820.70 820.140 820.150 820.160 820.170		QMS FS Director: DR FS; S1-S5 Human Resources: HR FS; S1-S6 Facility: FD FS; S1-S3 Safety: LS FS; S1-S17	ISO 17025:2017 Clauses 6.1 - 6.4; 6.6; 7.1 ISO 15189:2012 Clauses 4.3 - 4.7; 5.1, 5.2, 5.3, 5.10 ISO 15190:2020	Facilities: QMS01, QMS23 Personnel: QMS03 Suppliers: QMS01 Equipment: QMS01, QMS13 Process Management: EP12, QMS01, QMS02, EP10 Documents: QMS02, QMS26
	5. Verification	General	820.30 820.86		Resources: RM FS Equipment LEI S1-S9 Reagents: RGM S1-S5 Test Performance Specs: TPS S1: S3-S5 Calibration: CAL S1	ISO 17025:2017 Clause 7.2.1 Clause 7.11.2 ISO 15189:2012 Clauses 4.3, 5.3.1.7, 5.5.1.2	Personnel: QMS03, EP12 Equipment: QMS23 Process Management: QMS18, EP23, C24 Documents: QMS02, QMS26
		Risk Assessment		IQCP in Interpretive Guidelines; refers to 493.1256(d) https://www.cms.gov/regulations-and-guidance/legislation/CLIA/Individualized_Quality_Control_Plan_IQCP.html 493.1253(b)(3) and c	QC S2	ISO 17025:2017 Clause 8.5 ISO 15189:2012 Clause 4.14.6	EP18, EP21, EP23
		Precision		493.1253(b)(1)(i)(B) & c		ISO 15189:2012 Clauses 5.5.1.4, 5.5.2 ISO 17025:2017 Clauses 7.6	EP15, EP09, EP21, EP12
		Accuracy		493.1253(b)(1)(i)(A) & c			EP07
		Measuring Interval		493.1253(b)(1)(i)(C) & c			EP06, EP34
		Reference Interval		493.1253(b)(1)(ii) & c			EP28
		Detection Capability					EP17

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	Phases	Activity	REQUIREMENTS				CLSI GUIDELINES
			FDA QSR	CLIA	NYS	ISO	
	6. Preparation and Launch		820.30 820.50 820.120, 820.130	493.1236, 493.1252, 493.901-905, 493.1100-1105, 493.1200-1299	QMS: S1-S3 Resources: GRM S1-S7 LIS: LIS-FS; S1-S6 Documents: DC-FS; DC S1-S5 Referral Labs: RCL S1-S3 Preanalytic: PRS FS; TR S1-S4; SP S1-S8 Analytic: AS FS; TPC S1-S2; TPS S1, S3-S4 Calibration: CAL S1 QC S1-S8 Postanalytic: PAS-FS; RR S1-S2 Confidentiality: CON S1-S3	ISO 13485:2016 Clauses 4.2.3, 7.4 ISO 17025:2017 Clauses 6.5; 7.3 through 7.8; 7.11 ISO 15189:2012 Clauses 4.3 through 4.7 Clauses 5.4 through 5.10	Customer Focus: QMS18, QMS19 Facilities: QMS01, GP17, M29, GP05 Personnel: QMS16, QMS03 Suppliers: QMS21, QMS05 Equipment: QMS04, QMS13, QMS23 Process Management: QMS01, QMS02, QMS18, QMS26, AUTO15, QMS06, EP23 Documents and Records: QMS18, QMS02, QMS26 Information Management: AUTO08, QMS22 Nonconforming Events: QMS11 Assessments: QMS17, QMS24, QMS12, QMS15

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Appendix A. (Continued)

	Phases	Activity	REQUIREMENTS				CLSI GUIDELINES
			FDA QSR	CLIA	NYS	ISO	
Implementation, continued	7. Maintenance	General	820.30, 820.40, 820.72, 820.90, 820.100, 820.181, 820.184, 820.186, 820.198, 820.200	493.1200, 493.1201-493.1227, 493.1230, 493.1233, 493.1234, 493.1235, 493.1236, 493.1239, 493.1240, 493.1241, 493.1242, 493.1249, 493.1251, 493.1252, 493.1289	Director: DR S5 QMS: S4–S7 Human Resources: HR S7-S10 Equipment: LE S5-S9 Calibration: CAL S2 Nonconformance: RR S3 Reporting: REP S1-S6 Public Health: S1-S2 Confidentiality: CON S1-S3 Retention: DSR FS; S1-S12 Investigation: ICA FS; S1-S5	ISO 13485:2016 Clauses 4.2.3; 8.1 through 8.5 ISO 17025:2017 Change control and Clauses 7.9, 7.10, 7.11; 8.3, 8.4, 8.6 through 8.9 ISO 15189:2012 Change control and Clauses 4.3; 4.8 through 4.15	Organization: QMS14 Customers: QMS19 Facilities: GP17 Personnel: QMS03 Suppliers: QMS21, QMS05, EP26 Equipment: QMS13, QMS23 Process Management: QMS18, C24, EP23 Documents: QMS02, QMS26 Information Management: AUTO08, AUTO15 Nonconforming Events: QMS11 Improvement: QMS06
		Quality Assessment		Subpart H, 493.1236, 493.1254, 493.1255, 493.1256	Director: DR S4 QC: S9-S14 Proficiency Testing: PT FS; S1-S16	ISO 17025:2017 Clause 7.7 ISO 15189:2012 Clause 5.6	QMS17, QMS24, QMS12, QMS15
		Result Comparability		493.1281(a) 493.1281(b)	TPS S5		EP26, EP31
		Results Review and Follow-up		493.1290, 493.1291, 493.1299	RR S1-S2		EP31
	8. Retirement		820.180	493.1105	Document Control: DC S6 Retention: DSR FS Safety: LS S13	ISO 13485:2016 Clauses 4.2.3, 4.2.4, 4.2.5 ISO 17025:2017 Clauses 7.11, 8.3, 8.4 ISO 15189:2012 Clauses 4.3, 4.13, 5.3.1.7, 5.10	Organization: QMS14 Customers: QMS18, QMS19 Equipment: QMS13, M29 Documents: QMS02, QMS26

* NYS Clinical Laboratory Standards Tables 1 and 2 contain discipline-specific requirements. Readers should refer to the standards document for this information.

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