Which QMS Standard should be chosen for the structural quality of a medical laboratory?

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IFCC Committee on Clinical Laboratory Management -
http://www.ifcc.org/ifcc-education-division/emd-committees/c-clm/

Satellite Educational Workshop on Intelligent Clinical Laboratory Management: Impacts on Quality System Improvement
Hilton Durban - October 22, 2017

Presentation outline

standardization of laboratory structures

Several standards for standardization and accreditation of the structural quality developed by medical societies or by ISO and related bodies

• Federal organization of healthcare vs. international norms
• Technical norms and structural differences between countries
• Challenges of technical norms in healthcare
• Uniform performance of accreditation bodies
• Application of quality standards in settings with limited resources
Quality management system (QMS)

compilation of organizational documents establishing policies and procedures to direct and control an organization with regard to quality

relates to general management activities, the provision and management of resources, the pre-examination, examination and post-examination processes and evaluation and continual improvement

captures the requirements of an organization and structurally provides a roadmap that explains **who, what, when, where** and **how** sustainable and repeatable outcomes will be achieved

Flowchart of compiling a standard

ISO (International Organization for Standardization) and IEC (International Electrotechnical Commission) form system for worldwide standardization

1. National bodies: members of ISO or IEC; participate in development of International Standards through technical committees

2. ISO and IEC technical committees collaborate in fields of mutual interest

3. Participation of other international organizations, governmental and non-governmental, in liaison with ISO and IEC

4. International Standards are drafted in accordance with rules of ISO/IEC Directives

5. Draft International Standards are circulated to the national bodies for voting

6. Publication as International Standard when approval by >75 % of national bodies
Proposal of new Technical Committee

ISO Committee Name: **ISO TC 212**

Committee Title: **in Vitro diagnostics and Quality**

Secretariat Country: **United States**

Secretariat Organization: **CLSI**

Number of countries: **33** (All continents represented)

Influences in the development of 15189

- **ILAC Guide 25**
- **ISO 17025**
- **CLSI Quality System Essential**
- **ISO 9000**
- **College American Pathologists Checklist**

**ISO 15189**

**Medical Laboratories**

**Requirements for Quality and Competence**
Requirements contained within ISO 15189

Five sections:
1. Scope
2. Normative references
3. Terms and conditions
4. Management requirements
5. Technical requirements

Contains all requirements for a clinical laboratory’s quality management system and the technical requirements used as the basis for confirming a clinical laboratory’s competence to perform specific clinical tests.

ISO 9001; 17025; 15189; 17020

QMS to safeguard the integrity of patients
BUT: Focus often unclear / intransparent
Focus on analytical techniques (ISO 17025; 15189)
Competence of examiner (ISO 17020)

Medicine is not an exact science, and at times requires some educated guesswork on the part of physicians and laboratories, Gary Marchant, a law professor at Arizona State University, told BuzzFeed. “Every time they’re wrong, it doesn’t mean there should be a lawsuit…But on the other hand, when they clearly haven’t lived up to professional expectations, there should be. There’s a gray zone, that’s a difficult line to draw.”
Performance improvement and quality standards

• **ISO15189 centred**
  – Australia: all medical laboratories accredited
    • ISO15189 accreditation linked to medicare benefits
• **National Quality Standard + ISO15189**
  – “Staged approach” in Thailand and Iran
  – GBEA (Guide de bonne exécution des analyses), France
  – RiLiBÄK, Germany
• **National Quality Regulation + ISO15189**
  – USA: Clinical Laboratory Improvement Amendments (CLIA)

**Benefits of standards**

- **Standard**: a document that provides requirements, specifications, guidelines or characteristics that can be used consistently to ensure that materials, products, processes and services are fit for their purpose.
- **ISO International Standards** ensure that products and services are safe, reliable and of good quality.
- Standards are strategic tools to reduce costs by minimizing waste and errors and increasing productivity.
- Standards help companies to access new markets and facilitate free and fair global trade.
- Government and industries around the world have been using international standards for more than half a century to facilitate trade, establish a technical base for regulation and safeguard consumers.
Obligation to render medical services in person

In Germany

**Common service law:** „In case of doubt, services have to be performed in person by the party/person obliged to render the service (§ 613 (1) BGB)“

Physician law: § 19 (1) rules of professional conduct

Public insurance: § 32 (1) „Zulassungsverordnung für Vertragsärzte“ and § 15 (1) „Bundesmantelvertrag-Ärzte“

**Accreditation of a medical laboratory according to ISO 15189 has to reflect these legal requirements**

**Obvious conflict between of universal norm with national law**

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**EN 16372 Aesthetic Surgery Services**

“The market is already ‘Europeanised’, with patients travelling to other countries to have procedures, where markets are often unregulated and patients are vulnerable to complications.

The standard will help create a level playing field in Europe and ensure that the reputation of competent well-trained surgeons is not compromised at the hands of those who are not fit to practice

- Ethics and marketing
- Consultation procedure
- Competencies
- Management and communication with patients
- Available facilities
- Categorisation and risk level of the procedures”

Source: BSI
<table>
<thead>
<tr>
<th></th>
<th>Norms</th>
<th>Guidelines</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scope</strong></td>
<td>International</td>
<td>National, international</td>
</tr>
<tr>
<td><strong>Target</strong></td>
<td>Requirements for technical correct behaviour in most/standardized situations resp. for services (conformity)</td>
<td>Recommendations for physicians and patients for diagnostic and therapeutic procedures for each patient (individually)</td>
</tr>
</tbody>
</table>
| **Triggers** | • Need of market  
       • Economic profit | • Improvement of services and information  
       • Optimization of patient treatment  
       • Education/training  
       • Quality assurance |
| **Participants, representation** | Interested parties including industry | Stakeholders, no direct influence of industry |
| **Content based** | State of the art knowledge and technology | Evidence-based, independent systematic literature search and evaluation |
| **Decision making** | Not defined, dissent not communicated | Consensus decision, communication of consensus strength and dissent |
| **Transparency** | Only during development (comments) | High, process publically available |
| **Editorial Independency** | No regulations for conflict of interests financial conflicts not exclude | Clear and transparent regulations for conflict of interests, no financial conflicts |
| **Access** | Limited, for fee | Unlimited, free, published in the internet |

**Objective: confidence in inspection bodies**

Conformity with regulations, standards, specifications, inspection schemes or contracts. Inspection includes matters of quantity, quality and **fitness for purpose** of installations or systems in operation.

Examination of materials, products, installations, plants, processes, work procedures or services, determination of conformity with requirements and reporting of results to clients and authorities.

Work requires professional judgement in performing inspection, in particular when assessing conformity with general requirements.

Inspection activities can overlap with testing and certification activities.

**BUT:** professional judgement to determine acceptability against general requirements, for which reason inspection body needs necessary competence to perform the task.
Definitions of DIN EN ISO 17020

**Product:** result of a process
software (dictionary); hardware (mechanical part); processed materials (lubricant)
In products with elements of different categories, designation depends on dominant element
Products include results of natural processes, such as growth of plants

**Process:** set of interrelated or interacting activities which transforms inputs into outputs

**Service:** result of activity performed at interface between supplier and customer (intangible)
Provision of service can involve activity performed on customer-supplied intangible product (e.g. the income statement needed to prepare a tax return); delivery of intangible product (e.g. the delivery of information in the context of knowledge transmission)

**Impartiality:** presence of objectivity -- conflicts of interest do not exist / are resolved

**terms useful in conveying impartiality:** independence, freedom from conflict of interests, freedom from bias, lack of prejudice, neutrality, fairness, open-mindedness, even-handedness, detachment, balance

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### Coverage of legal requirements

<table>
<thead>
<tr>
<th>Legal requirements</th>
<th>ISO 17025</th>
<th>ISO 17020</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technical equipment</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Education of personnel</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Professional knowledge</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>System knowledge</td>
<td></td>
<td>x</td>
</tr>
<tr>
<td>Liability</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Independency</td>
<td></td>
<td>x</td>
</tr>
<tr>
<td>Objectivity</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Confidentiality</td>
<td>x</td>
<td>x</td>
</tr>
</tbody>
</table>

**ISO 17020 includes ISO 17025**

no inclusion of assessment (vs. report) in ISO 17025
DIN EN ISO 15189

Management

Error and improvement

Laboratory quality

Technical quality

Staff

Customer

Physical lab

Audit

Detect

Prevent

Correct

Pre-examination

Examination

Post-examination

Sample Security

Safety

Job description

Training

Competency

Proficiency

Review

Patients

Family

Clinicians

Public Health

Community

Monitor

integrity of the inspection body

competence of its people

independence

Impartiality

equipment

inspection processes

ISO 17020

general criteria are supplemented by a variety of ILAC and IAF/ILAC documents and specific scheme requirements
Accreditation of inspection bodies

Most economies with one or more accreditation bodies for the accreditation of inspection bodies to the ISO/IEC 17020 standard

Accreditation bodies are part of government, established by Government, or formally recognised by Government or private entities

ILAC body members provide accreditation services according ISO/IEC 17011 – *Conformity assessment* – *General requirements for accreditation bodies accrediting conformity assessment bodies* ensuring consistent approach to the assessment and accreditation of inspection bodies

ISO/IEC 17020 mandatory for ILAC body members for accreditation of inspection bodies

- validity and appropriateness of inspection methods
- technical competence of staff
- suitability and maintenance of inspection equipment
- where necessary, traceability of measurements
- sampling, handling and identification of inspected items
- quality assurance of inspection data, inspection reports and certificates

RiliBAEK J Lab Med 2015; 39(1): 26–69


Since 2002, quality *assurance* in medical laboratory tests belongs to *Medical Product Law*


2008 version of Rili-BAEK: Section A QMS (protection of the patient). Section A applies to all users of medical laboratory procedures.

Implementation of Section A of the Rili-BAEK guideline fulfils the statutory rules of a QMS
Rili-BAEK: Promulgation of EU directives on medical products

2002 EU Medical Devices Marketing Regulations

Rili-BAEK guideline was created in 2004 in cooperation with
• medical research institutions
• German hospital Association (DKG)
• National Association of Statutory Health Insurance Physicians (KBV)
• Association of Biotechnologists (dvta)
• Agencies responsible for monitoring medical product regulations
• Association of IVD companies (VDGH)
• top-level Federal agencies (Physikalisch Technische Bundesanstalt (PTB), Robert Koch Institute (RKI), Paul Ehrlich Institute (PEI))

Low Resources: Medical laboratory quality gaps

Structural issues
weak or little regulatory/quality assurance framework put in place in resource limited settings
in contrast to pharmaceutical products
putting technologists working in the forefront at unacceptably high risks of occupational infection and patients of wrong reports
inappropriately equipped/serviced facilities
insufficiently trained/educated personnel, lack of continuous training

Dilemma
International standards exist but not readily feasible/realistic for many with resource constraints, especially for intermediate/district level laboratories
leaving them an “all or nothing” situation
→ “staged approach” setting challenging yet achievable milestones to ensure long-term goals are reached
What is the difference between SLIPTA and SLMTA?

What is SLMTA?
Strengthening Laboratory Management Toward Accreditation

A task-based training and mentoring tool kit provided to the laboratory personnel in a multi-workshop implementation model. The foundation of this programme is a framework that defines the tasks a laboratory manager must perform in order to deliver quality laboratory services which support optimal patient care. Training activities are designed to enable laboratory managers to accomplish those tasks, using tools and job aids to enhance their management routines. It empowers laboratory managers to initiate immediate laboratory improvement measures, even without additional resources. For more information about SLMTA, please visit www.SLMTA.org

What is SLIPTA?
Stepwise Laboratory Quality Improvement Process Towards Accreditation

A framework of auditing developed in line with the ISO 15189:2007 Standards and to a certain extent with the 12 Quality System Essentials of the CLSI Laboratory Quality Management System Guidelines. It is used to measure and evaluate the progress of laboratory quality systems and award a certificate of recognition (five star levels). It can be used as baseline, during supervision, and for monitoring and evaluation of laboratory progress towards accreditation.

<table>
<thead>
<tr>
<th>SLMTA</th>
<th>SLIPTA</th>
</tr>
</thead>
<tbody>
<tr>
<td>A toolkit for training and mentoring</td>
<td>A framework for auditing and monitoring</td>
</tr>
<tr>
<td>Prepares and supports laboratory quality</td>
<td>Checks and monitors the improvement process</td>
</tr>
<tr>
<td>Improvement</td>
<td>using the SLIPTA checklist</td>
</tr>
<tr>
<td>Develops work plans and executes</td>
<td>Identifies gaps, non-conformities and</td>
</tr>
<tr>
<td>improvement projects</td>
<td>provides recommendations for corrective</td>
</tr>
<tr>
<td>Implemented by laboratory personnel</td>
<td>actions</td>
</tr>
<tr>
<td>(laboratory managers)</td>
<td>Audits performed by ASLM-certified SLIPTA</td>
</tr>
<tr>
<td>Graduates on SLMTA and prepares for</td>
<td>determines star level and provides Certificate of</td>
</tr>
<tr>
<td>Inspection</td>
<td>Recognition (1-5 star levels)</td>
</tr>
</tbody>
</table>

11/7/2017
2.0 Scope

This checklist specifies requirements for quality and competency aimed to develop and improve laboratory services to raise quality to established national standards. The elements of this checklist are based on ISO standard 15189:2012 (E) and, to a lesser extent, CLSI guideline QMS01-A4; Quality Management System: A Model for Laboratory Services; Approved Guideline – Fourth Edition.

Recognition is provided using a five star tiered approach, based on a bi-annual on-site audit of laboratory operating procedures, practices, and performance. The audit checklist score will correspond to the number of stars awarded to a laboratory in the following manner:

<table>
<thead>
<tr>
<th>No Stars (0 – 150 pts)</th>
<th>1 Star (151 – 177 pts)</th>
<th>2 Stars (178 – 205 pts)</th>
<th>3 Stars (206 – 232 pts)</th>
<th>4 Stars (233 – 260 pts)</th>
<th>5 Stars (261 – 275 pts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 55%</td>
<td>55 – 64%</td>
<td>65 – 74%</td>
<td>75 – 84%</td>
<td>85 – 94%</td>
<td>≥ 95%</td>
</tr>
</tbody>
</table>

Audit Score Sheet

<table>
<thead>
<tr>
<th>Section</th>
<th>Total Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Section 1: Documents &amp; Records</td>
<td>28</td>
</tr>
<tr>
<td>Section 2: Management Reviews</td>
<td>14</td>
</tr>
<tr>
<td>Section 3: Organization &amp; Personnel</td>
<td>22</td>
</tr>
<tr>
<td>Section 4: Client Management &amp; Customer Service</td>
<td>10</td>
</tr>
<tr>
<td>Section 5: Equipment</td>
<td>35</td>
</tr>
<tr>
<td>Section 6: Evaluation and Audits</td>
<td>15</td>
</tr>
<tr>
<td>Section 7: Purchasing &amp; Inventory</td>
<td>24</td>
</tr>
<tr>
<td>Section 8: Process Control</td>
<td>32</td>
</tr>
<tr>
<td>Section 9: Information Management</td>
<td>21</td>
</tr>
<tr>
<td>Section 10: Identification of Non Conformities, Corrective and Preventive Actions</td>
<td>19</td>
</tr>
<tr>
<td>Section 11: Occurrence/Incident Management &amp; Process Improvement</td>
<td>12</td>
</tr>
<tr>
<td>Section 12: Facilities and Biosafety</td>
<td>43</td>
</tr>
<tr>
<td>TOTAL SCORE</td>
<td>275</td>
</tr>
</tbody>
</table>

ISO15189:2012 Clause 4.1.2.7: The laboratory or the organisation of which the laboratory is a part shall be an entity that can be held legally responsible for its activities. Note: Documentation could be in the form of a National Act, Company registration certificate, License number or Practice number.

<table>
<thead>
<tr>
<th>1.2 Laboratory: Quality Manual</th>
<th>Y</th>
<th>P</th>
<th>N</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is there a current laboratory quality manual, composed of the quality management system’s policies and has the manual content been communicated to, understood and implemented by all staff?</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The quality manual includes the following elements:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a) Quality policy statement that includes scope of service, standard of service, measurable objectives of the quality management system, and management commitment to compliance.</td>
<td>Y</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Challenges of standards in laboratory medicine

Standards developed by ISO and related bodies are widely used
- conflict of interest, focus on free trade and consumer rights
- Not reflecting specific situations (national organization of healthcare!)
- Focus of some norms (15189 and 17025) primarily on technical part, 17020 on assessor
- Regulation of healthcare matters not within the scope of ISO and related bodies

Challenges of accreditation:
- Countries without and with several accreditation bodies
- Spending resources for consulting firms instead for the training of the personnel

Outlook / Solutions
- QM systems developed by medical associations (e.g. Rilibäk)
- Settings with limited resources: stepwise approach in increasing the quality

WHO: “Stepwise Laboratory Improvement Process Towards Accreditation” (SLIPTA)

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