Joint Commission Aligns with CMS on Laboratory Policies

The Joint Commission recently announced two changes to accreditation policies for laboratories that are designed to align with updates from the Centers for Medicare & Medicaid Services (CMS). Effective in early April 2016, the changes result from CMS’s clarification of its policy on acceptable control materials and its acceptance of primary source verification (PSV) as evidence of compliance with personnel qualifications.

Acceptable Control Materials

The Joint Commission allows the use of onboard controls to align with CMS’s acceptance of onboard quality controls,* examples of which are ampules or cartridges containing the same quality control (QC) material that would traditionally be considered as external QC. In compliance with Quality


System Assessment for Nonwaived Testing (QSA) Standard QSA.02.09.01, Elements of Performance (EPs) 1 and 2 (see box above), using onboard controls is allowed as long as the QC specimens follow the same physical pathway as a patient specimen.

In addition, laboratories must demonstrate and show records such as instrument manuals and manufacturer’s instructions.

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PSV and Personnel Requirements
The Joint Commission also allows PSV in lieu of direct evidence of academic records (such as transcripts, diploma, certificates) to align with CMS’s acceptance of PSV as evidence of compliance with personnel qualifications.†

In cases where the laboratory is in a state that does not require licensure, proof of license alone (whether via PSV or actual documentation/copy of license) is not sufficient. The laboratory must show proof that the educational requirements for respective job responsibilities have been met, and licenses must be verified. In cases where the laboratory is in a state that requires licensure, no further documentation is required.

To comply with Human Resources (HR) Standard HR.01.02.05, EP 3 (see box above), there is no need to have paper copies of diplomas/transcripts in addition to the PSV report. The phrase “verifies and documents” in EP 3 simply indicates the organization should provide a documented verification of education and experience.

If the PSV report does not provide all required personnel data, laboratories must provide additional documentation that meets all the requirements.

Questions may be directed to your assigned Account Executive at 630-792-3007.


Standard HR.01.02.05
The laboratory verifies staff qualifications.

Element of Performance for HR.01.02.05
3. The laboratory verifies and documents that the applicant has the education and experience required by the job responsibilities.