



CAP Personnel Requirements by Testing Complexity*

Laboratory Director¹

Waived Testing	Moderate Complexity Testing	High Complexity Testing
<ol style="list-style-type: none">1. MD, DO, or DPM with a current medical license²; OR2. Doctoral degree in chemical, physical, biological or clinical laboratory science from an accredited institution	<ol style="list-style-type: none">1. Qualified as a director for high complexity testing; OR2. MD, DO or DPM with a current medical license² and laboratory training/experience consisting of:<ol style="list-style-type: none">a. 1 year of experience supervising non-waived testing; ORb. At least 20 CME credit hours in laboratory medicine; ORc. Equivalent training obtained during medical residency/fellowship; OR3. Doctoral degree in chemical, physical, biological or clinical laboratory science with:<ol style="list-style-type: none">a. Current certification by a board approved by HHS; ORb. 1 year experience supervising non-waived testing	<ol style="list-style-type: none">1. MD or DO with a current medical license² and board-certification in Anatomic and/or Clinical Pathology or possess equivalent qualifications as those required for certification; OR2. MD, DO or DPM with a current medical license² and laboratory training/experience consisting of the following:<ol style="list-style-type: none">a. 1 year laboratory training during medical residency/fellowship; ORb. 2 years' experience supervising high complexity testing; OR3. Doctoral degree in chemical, physical, biological or clinical laboratory science with current certification by a board approved by HHS

LABORATORIES NOT SUBJECT TO US REGULATIONS – ALL COMPLEXITY LEVELS

1. MD or DO licensed to practice (if required) in the jurisdiction where the laboratory is located **AND** have **one of the following**:
 - a) Certification in anatomic or clinical pathology; or
 - b) At least one year of laboratory training during medical residency/fellowship; or
 - c) At least two years of experience supervising high complexity testing;

OR
2. Doctoral degree in a chemical, physical, biological or clinical laboratory science **and** have both of the following:
 - a) At least two years of clinical laboratory training or experience **and**
 - b) Two years of laboratory experience directing or supervising high complexity testing

Clinical Consultant

Waived Testing	Moderate Complexity Testing	High Complexity Testing
Not Applicable	<ol style="list-style-type: none">1. MD, DO, or DPM with a current medical license²; OR2. Doctoral degree in chemical, physical, biological or clinical laboratory sciences with certification by a board approved by HHS.	<ol style="list-style-type: none">1. MD, DO, or DPM with a current medical license²; OR2. Doctoral degree in chemical, physical, biological, or clinical laboratory sciences with current certification by a board approved by HHS

*If the laboratory is subject to more stringent state or local regulations (eg, state licensure), the most stringent requirement must be followed.

¹The Director may fulfill multiple roles. While CLIA may allow for non-physician or nondoctoral degreed individuals to direct Waived and Moderate Complexity laboratories, CAP does not.

² The license to practice medicine must be in the jurisdiction where the laboratory is located (if required). Military and VA personnel may be licensed in any US State.

Technical Consultant		
Waived Testing	Moderate Complexity Testing	High Complexity Testing
Not Applicable	<ol style="list-style-type: none"> 1. MD or DO with a current medical license² and board-certification in Anatomic and/or Clinical Pathology or possess equivalent qualifications as those required for certification; OR 2. MD, DO, or DPM with a current medical license² with at least 1 year of training and/or experience in nonwaived testing in the designated specialty/subspecialty area; OR 3. Doctoral or master's degree in a chemical, physical, biological or clinical laboratory science with at least 1 year of training and/or experience in nonwaived testing in the designated specialty/subspecialty area; OR 4. Bachelor's degree in a chemical, physical, biological or clinical laboratory science or medical technology with at least 2 years of experience in nonwaived testing in the designated specialty/subspecialty area*. 	Not Applicable
Technical Supervisor		
Waived Testing	Moderate Complexity Testing	High Complexity Testing
Not Applicable	Not Applicable	<p>For the disciplines of Transfusion Medicine, Cytogenetics, Molecular Pathology, and Histocompatibility, refer to checklist requirements TRM.50050, CYG.50000, MOL.49650, and HSC.40000, respectively for details on educational qualifications and experience.</p> <p>For the specialties of Anatomic, Cytopathology and Clinical Pathology:</p> <ol style="list-style-type: none"> 1. MD or DO with a current medical license² and board-certification in Anatomic or Clinical Pathology or possess qualifications equivalent to those required for certification. <ul style="list-style-type: none"> • Technical supervisors overseeing anatomic or cytopathology services must have board-certification in anatomic pathology or equivalent qualifications. • Technical supervisors overseeing a clinical pathology specialty must have board-certification in clinical pathology or equivalent qualifications • Technical supervisors responsible for anatomic pathology, cytopathology, and clinical pathology must have board-certification in both anatomic and clinical pathology or equivalent qualifications.

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Technical Supervisor, cont'd		
Waived Testing	Moderate Complexity Testing	High Complexity Testing
Not Applicable	Not Applicable	<p>For other specialties, not including Anatomic Pathology and Cytopathology:</p> <ol style="list-style-type: none"> 1. MD or DO with a current medical license² and 1 year training and experience in high complexity testing in the respective specialty; OR 2. Doctoral degree in clinical laboratory science, chemical, physical or biological science with 1 year training and experience in the respective specialty; OR 3. Master's degree in medical technology, clinical laboratory science, or chemical, physical, or biological science and 2 years training and experience in high complexity testing in the respective specialty; OR 4. Bachelor's degree in medical technology, or chemical, physical or biological science and 4 years training and experience in high complexity testing in the respective specialty. <p>For the specialty of Oral Pathology, the Technical Supervisor must be a MD or DO with a current medical license² and have specific training/experience as defined in 42CFR493.1449(m).</p> <p>Refer to the CLIA regulation 42CFR493.1449 for additional qualifications.</p>
General Supervisor		
Waived Testing	Moderate Complexity Testing	High Complexity Testing
Not Applicable	Not Applicable	<ol style="list-style-type: none"> 1. Qualified as a Director for high complexity testing; OR 2. Qualified as a Technical Supervisor for high complexity testing; OR 3. Bachelor's degree in clinical laboratory science, medical technology or chemical, physical, or biological science and 1 year training and experience in the designated discipline or area of service; OR 4. Associate degree in laboratory science or medical technology or equivalent education and training (refer to 42CFR493.1489(b)(2)(ii) for details on required courses and training) AND 2 years laboratory training or experience, or both, in the designated discipline or area of service <p>Refer to the CLIA regulation 42CFR493.1461 for additional qualifications</p>

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Testing Personnel		
Waived Testing	Moderate Complexity Testing	High Complexity Testing
No specific requirements outlined in the CAP or CLIA regulations, however each laboratory must ensure waived testing personnel meet facility-defined minimum requirements and have records of training and competency assessment	<ol style="list-style-type: none"> 1. MD or DO with a current medical license²; OR 2. Doctoral degree in clinical laboratory science, chemical, physical or biological science; OR 3. Master's degree in medical technology, clinical laboratory, chemical, physical, or biological science; OR 4. Bachelor's degree in medical technology, clinical laboratory, chemical, physical or biological science; OR 5. Associate degree in chemical, physical or biological science or medical laboratory technology; OR 6. High school graduate or equivalent and laboratory training/experience consisting of the following: <ol style="list-style-type: none"> a. Successfully completed military training of 50 or more weeks and served as a medical laboratory specialist; OR b. Appropriate training/experience as specified in 42CFR493.1423 	<ol style="list-style-type: none"> 1. MD or DO with a current medical license²; OR 2. Doctoral degree in clinical laboratory science, chemical, physical or biological science; OR 3. Master's degree in medical technology, clinical laboratory, chemical, physical, or biological science; OR 4. Bachelor's degree in medical technology, clinical laboratory science, chemical, physical or biological sciences; OR 5. Associate degree in laboratory science, chemical or biological science or medical laboratory technology or equivalent education and training (refer to 42CFR493.1489(b)(2)(ii) for details on required courses and training); OR 6. Individuals performing high complexity testing on or before April 24, 1995 with a high school diploma or equivalent with documented training may continue to perform testing only on those tests for which training was documented prior to September 1, 1997 (refer to CLIA regulation 42CFR493.1489(b) for details on required training) OR 7. Individual previously qualified or could have qualified as a technologist under CFR.493.1489 and CFR.493.1491 on or before February 28, 1992

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