UCLA Health

Laboratory Stewardship: What Why and How?



Learning objectives

- 1. Describe the importance of laboratory stewardship in the evolving healthcare landscape
- 2. Define the essential elements of a laboratory stewardship program
- 3. Compare and contrast the effectiveness of different laboratory stewardship intervention strategies



Poll question

Does your institution actively engage in laboratory stewardship, such as through a laboratory stewardship committee?







Does your institution actively engage in laboratory stewardship, such as through a laboratory stewardship committee?





Healthcare delivery is evolving





Clinical labs must do more with less









Expanding test menus and volumes Mergers & acquisitions

 Consolidation of laboratory services Labor shortages

Supply chain shortages



Other examples of stewardship

- Blood product utilization
 - Limited availability, high cost, inherent risks associated with transfusion
 - Blood utilization committees
 - Lead to significant decreases in unnecessary transfusions, improved outcomes

UCLA Health reduced transfusions by 20% with clinical decision support, allelectronic bar code scanning

The system moved away from a hybrid approach including paper and electronic barcode scanning and sees it as a boon to patient safety.

By John Andrews | January 11, 2017 | 07:05 AM







Other examples of stewardship

- Blood product utilization
 - Limited availability, high cost, inherent risks associated with transfusion
 - Blood utilization committees
 - Lead to significant decreases in unnecessary transfusions, improved outcomes
- Antibiotic stewardship
 - CDC estimates 30% of abx are unnecessary
 - Risks to individual and public health
 - CMS requires acute care hospitals to implement abx stewardship programs
 - § 482.42(b) and § 485.640(b)

UCLA Health reduced transfusions by 20% with clinical decision support, allelectronic bar code scanning

The system moved away from a hybrid approach including paper and electronic barcode scanning and sees it as a boon to patient safety.

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Centers for Disease Control and Prevention CDC 24/7: Saving Lives, Protecting People™



The Core Elements of Hospital Antibiotic Stewardship Programs: 2019



Labs are responsible for utilization monitoring

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Office of Inspector General

Publication of OIG Compliance Program Guidance for Clinical Laboratories

2. Medical Necessity

Laboratory compliance programs, to be effective, should communicate to physicians that claims submitted for services will only be paid if the service is covered, reasonable, and necessary for the beneficiary, given his or her clinical condition. Laboratories should take all reasonable steps to ensure that it is not submitting claims for services that are not covered, reasonable and necessary.7 Upon request, a laboratory should be able to produce or obtain from the treating physician (test ordering), authorized person on the physician's staff or other individual authorized by law to order tests the documentation to support the medical necessity of the service the laboratory has provided and billed to a Federal or private health care program. We recognize that laboratories

e. Test utilization monitoring: The OIG believes that laboratories can and should take the steps described in this compliance guidance to help ensure appropriate billing of lab tests. We also believe that there are steps laboratories can take to determine whether physicians or other individuals authorized to order tests are being encouraged to order medically unnecessary tests. More importantly, if the laboratory discovers that it has in some way contributed to the ordering of unnecessary tests, the OIG believes the laboratory has a duty to modify its practices, as well as notify the physician(s) or other authorized individual(s) of its concerns and recommend corrective action.



Rationale for Lab Stewardship

Table 1. Benefits of Optimizing Laboratory Test Utilization

Benefit	Laboratory	НСР	Patient	НСО	General Populations
Decreased total cost of care	Х		Х	Х	Х
Decreased laboratory costs	Х		Х	Х	Х
Accurate and timely diagnosis		Х	Х	Х	Х
Reduced referred testing	Х	Х	Х	Х	
Decreased phlebotomy	Х		Х	Х	
Improved patient satisfaction		Х	Х	Х	Х
Improved patient outcomes		Х	Х	Х	Х

Abbreviations: HCO, health care organization; HCP, health care provider.



CLSI GP49, 1st ed. (2017)

Just some (of the many) adverse effects of over-testing

- Hospital-acquired anemia
 - ~20% of hospitalized patients
- Increased chance of clinically misleading or falsely abnormal results
- Potential for unnecessary workup, patient anxiety
- Increased laboratory costs and labor
 - Increased TATs





Defining Lab Stewardship

- Also known as lab utilization management
- Focuses on test value
- 2 primary goals (PLUGS Guidelines): V



- "Improving the ordering, retrieval, and interpretation of appropriate laboratory tests."
- "Developing, maintaining, and improving systems to provide proper financial coverage for medically necessary testing."



Dickerson et al. JALM 2:2 (2017)

Much of the focus has been on over-utilization

- Increased rates of referral lab testing (e.g., molecular)
- 10-30% of tests are either unnecessary or inappropriate¹
- ~30% of genetic test orders are inappropriate²
 - ~5% of genetic test orders are frank medical errors³
- 7% of test results are never retrieved, or retrieval is significantly delayed⁴
- Labs may be ordered in duplicate or too soon in frequency
 - e.g., HbA1c within 3 mos. of the last result



2) Zhi et al. *PLoS ONE* 2013;8:1–8.
 2) Miller et al. *Am J Med Genet A* 2014;164:1094–101.
 3) Mathias et al. *Am J Clin Pathol* 2016;146:221–6.
 4) Casalino et al. *Arch Intern Med* 2009;169:1123–9.

What contributes to over-utilization?

TABLE 1. Residents' Self-Reported Frequency ofand Factors Contributing to Perceived UnnecessaryInpatient Laboratory Ordering

	Residents (n = 116)*
Reported he or she orders unnecessary routine labs, no. (%)	96 (82.8)
Frequency of ordering unnecessary labs, no. (%)	. ,
Daily	47 (49.0)
2-3 times/week	44 (45.8)
1 time/week or less	5 (5.2)
Agreement with statement as factors contributing to	
ordering unnecessary labs, no. (%)†	
Practice habit; I am trained to order repeating daily labs	105 (90.5)
Lack of cost transparency of labs	100 (86.2)
Discomfort with diagnostic uncertainty	96 (82.8)
Concern that the attending will ask for the data and I will not have it	88 (75.9)
Lack of role modeling of cost conscious care	78 (67.2)
Lack of cost conscious culture at our institution	76 (65.5)
Lack of experience	72 (62.1)
Ease of ordering repeating labs in EHR	60 (51.7)
Fear of litigation from missed diagnosis related to lab data	44 (37.9)

Sedrak et al. J Hosp Med. (2016)



Defining problems and goals

Risks of patient harm

- Misordering
 - Ordering an unnecessary test
 - Ordering the wrong test/mistake
- Misinterpreting results
- Failure to retrieve and act on results
- Unnecessary costs to patients and health system



Defining problems and goals

Risks of patient harm

- Misordering
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Stewardship goals

- Avoid duplicate testing
- Stop erroneous orders
- Define and implement best practices/order algorithms
- Establish consistent testing practices across the system
- Influence provider and ordering culture towards high quality, fiscally responsible practices



Resources and guidelines



GP49

Developing and Managing a Medical Laboratory (Test) Utilization Management Program

This report provides guidance for initiating developing, and maintaining on effective text adication program.

a 41 Strepert to UK application

SPECIAL REPORT

Transforming Laboratory Utilization Review into Laboratory Stewardship: Guidelines by the PLUGS National Committee for Laboratory Stewardship

Jane A. Dickerson,^{1,2}* Andrew H. Fletcher,³ Gary Procop,⁴ David F. Keren,⁵ Ila R. Singh,⁶ Joaquin J. Garcia,⁷ Robert B. Carpenter,² Joe Miles,³ Brian Jackson,³ and Michael L. Astion^{1,2}

Appropriate utilization of clinical laboratory services is important for patient care and requires institutional stewardship. Clinical laboratory stewardship programs are dedicated to improving the ordering, retrieval, and interpretation of appropriate laboratory tests. In addition, these programs focus on developing, maintaining, and improving systems to provide proper financial coverage for medically necessary testing. Overall, clinical laboratory stewardship programs help clinicians in prove the quality of patient care while reducing costs to patients, hospitals, and health systems. This document, which was created by a new multististitutional committee interested in promoting and formalizing laboratory stewardship, summarizes core elements of successful hospital-based clinical laboratory stewardship programs. The core elements will also be helpful for independent commercial clinical laboratories.

Pathology and laboratory medicine have transformed the practice of medicine by providing tests and services for diagnosis, tratament, monitoring and prevention of disease and driving advances in lifelids of medicine by providing tests and prevention of disease and driving advances in lifelids of medicine by tests and the US sach set all a traview of laboratory tests performed in the US are either unnecessary or inappropriate (4). About 30% of generic test orders are inappropritest (5). And about 5% of generic test orders are inappropriate blacks of patient train related to laboratory services are ordering the

- Oppartment of Luboratories, Earth Olikhmin Hospital, Gesthi, MK-Obpartment of Luboratory Medicine, Linkenity of Maxingens, Santhi, MK-Obpartment of Luboratory Medicine, Linkenity of Maxingens, Santhi, MK-Obpartment of Luboratory Medicine and Luboratory Medicine and

017 American Association for Clinical Chemistry sectandard abbreviations: UM, utilization management: PLUGS, Pediatric Laboratory Utilization Guidance Services: CPDE, com

September 2017 | 02:02 | 259-268 | JALM 259

COLLEGE of AMERICAN PATHOLOGISTS	4			All Sites	~	Search		Q
Member Resources 🗸	Advocacy 🗸	Laboratory Improvement 🗸	Education 🗸	Protocols a	and Guidelir	nes 🗸	Publications V	

Home > Laboratory Improvement > Test Ordering Program

Test Ordering Program

Lead your organization's laboratory stewardship to drive operational excellence, achieve diagnostic confidence, and ensure the best patient care.



f 🕑 in 🛱 🤫 🤫

17

tead about utilization management techniques to lelp you allocate resources more effectively for letter patient care.

Better Laboratory Stewardship

Read the article

Optimal Testing ADLM's Guide to Lab Test Utilization

Choosing Wisely

An initiative of the ABIM Foundation

Optimal Testing ADLM's Guide to Lab Test Utilization

The content for Optimal Testing: ADLM's Guide to Lab Test Utilization has been developed and approved by the the Academy of Diagnostics & Laboratory Medicine and ADLM's Science and Practice Core Committee.

72 Hour Quantitative Fecal Fat

Amylase

Anti-Gliadin Antibody Assay

Bleeding Time

<u>CKMB</u>

Estradiol Testing in Men

Ferritin in Pediatrics

Fetal Lung Maturity Testing

Hemoglobin A1c

High-sensitivity C-reactive Protein (hs-CRP)

Homocysteine

IgG Food Allergen

Lyme Disease Nucleic Acid Amplification Testing

Oral Glucose Tolerance Test

Plasma Qualitative Methylated Septin 9

Prostatic Acid Phosphatase PAP PSAP

Qualitative Serum Human Chorionic Gonadotropin

Reverse Triiodothyronine (rT3)

Serum Free Light Chains

Stool Reducing Sugars

T3 uptake

Testosterone Testing in Women

Total Thyroxine

Vitamin B1 or Thiamine

Vitamin B12 or Cobalamin

Vitamin D

To recommend a test of limited clinical utility or suboptimal utilization that has sufficient evidence to formulate impactful recommendations, follow <u>this link</u> to fill out our test recommendation form.

https://www.aacc.org/advocacy-and-outreach/optimal-testing-guide-to-lab-test-utilization

Stewardship intervention techniques by strength (and likely effectiveness)

Medium	Strong
Utilization report cards	Utilization report cards with peer or leadership review
Changes to manual requisitions	Privileging specific tests to specialty providers
Hiding tests in CPOE systems	Laboratory formulary including send- out formulary
Periodically reviewing and updating physician preferences	Requirement for high-level approval or consultation
	Rules requirement
	MediumUtilization report cardsChanges to manual requisitionsHiding tests in CPOE systemsPeriodically reviewing and updating physician preferences



Essentials of a Stewardship Program





adapted from PLUGS

Importance of governance and buy-in

- Effective stewardship often involves changes to:
 - In-house test menu and/or send-out test formulary
 - Laboratory and hospital written policies
 - Electronic health record/order system design
- These changes require high-level approvals
- Enforcement requires cooperation by ordering providers
 - High-level (beyond Pathology) support enhances compliance
 - Engagement of non-Pathology providers in the whole process
 - Multidisciplinary expertise for different clinical contexts and workflows



Key stakeholders



- Pathologists and doctoral directors
- Managers and supervisors
- Staff of all levels



Administration and Finance, Regulatory

IT

- Clinical informatics
- EHR/LIS programming and governance

Clinicians (Hospital and Ambulatory)

- Department and specialty division chairs
- Representation for all providers with ordering privileges
- Sample collectors



UCLA Lab Stewardship governance





graphics courtesy of Dr. Josh Deignan and Monique Trinh

UCLA Lab Stewardship governance





graphics courtesy of Dr. Josh Deignan and Monique Trinh

Examples of stewardship interventions



Gentle example: scary screensaver



Unnecessary Testing Costs US Healthcare \$200 Billion/Yr

1.Do NOT order "daily" labs2.Only order a test that will change your management3.Reduce low-yield tests

ESR (very rarely indicated)
 Portable CXR (90% read as "unchanged"—don't order daily!)
 Daily CBCs, Mg, Phos

only order these if the results will change management



Gentle example: cost transparency

Gentle

Posting guidelines on the requisition

Computerized reminders regarding utilization guidelines

Educational lectures

Consensus reference laboratory preselection for specialized testing

Providing relative cost information in CPOE

Procedur	es 🕆
	Name
R	1,5 Anhydroglucitol Quant, Serum/Plasma (Send-out, \$47 (\$), 4 days)
4	5' Nucleotidase (Send-out, \$12 (\$), 2 days)
4	11-Deoxycortisol Quantitative, Serum (Send-out, \$27 (\$), 5 days)
4	17-Alpha-OH Progesterone (Send-out, \$19 (\$), 4 days)
4	17-OH-Pregnenolone (Send-out, \$27 (\$), 4 days)
4	21-Hydroxylase Antibody (Send-out, \$45 (\$), 10 days)
4	Acetylchol Recen Modulating Ab (Send-out \$35 (\$) 7 days)

Cost group	
\$	\$4–50 (\$4 min.)
\$\$	\$51–150
\$\$\$	\$151-450
\$\$\$\$	\$451+ (\$3,500 max.)



Gentle example: cost transparency

Gentle

Posting guidelines on the requisition

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Ikoma et al. Appl Clin Inform. (2022)

Medium example: report cards

Medium

Utilization report cards

Changes to manual requisitions

Hiding tests in CPOE systems

Periodically reviewing and updating physician preferences

Laboratory Utilization Report Card Exerpt			2011 Quarte	r 1; Clinic X		
TARGETS (tests	/100 well visits)		0	<5.5	<2.5	0
Practitioner	TOTAL VISIT S	TOTAL WELL VISITS	CMP	CBC	TSH	VIT D
MD 1	660	136			1	
MD 2	683	86			0	0
MD 3	439	79		0	0	0
MD 4	794	62		0		5
MD 3	379	68				0
ARNP 1	375	31				
ARNP 2	520	82			140	
Clinic Ave				5	1	
GHC Ave				3	2	



Kim Riddell, MD. Clinical Laboratory News (2012)

Medium example: order set presentation



Admission morning draw order set





Maria Vergara-Lluri, MD, LAC+USC Director of Hematology

Medium example: order set presentation

Madium		Pre- intervention	Post- intervention	Change (%)
Utilization report cards	Median labs per day (all,	529 (2.06 labs/patient-	454 (1.77 labs/patient-day)	-14%
Changes to manual requisitions Hiding tests in CPOE systems	total) CBC with differential	127	91	-28%
Periodically reviewing and updating physician preferences	CBC (no differential)	16	27	+69%
	CBC (all, total)	143	118	-17%



Deligero P et al., SHM 2019

Medium example: order set presentation

Health



McKnight K et al., SGIM Regional 2019

Medium example: Duplicate order alerts (if a "soft stop")

erner WAF	RNING: I	Duplicate Liver I	Function Test
Repeat testing is typically no	t warranted for thi	s analyte within 24 hours.	
An order for Liver Function T	est was found with	in 24 hours. The most recent results a	re included below:
Albumin Lvl:	4.1	2022-05-04 13:32 PDT	
Alk Phos:	44	2022-05-04 13:32 PDT	
AST:	47	2022-05-04 13:32 PDT	
ALT:	43	2022-05-04 13:32 PDT	
Bili Total:	1.0	2022-05-04 13:32 PDT	
Bili Direct:	0.2	2022-05-04 13:32 PDT	
Protein Total:	6.0	2022-05-04 13:32 PDT	
ee results review tab for re	ference ranges, res	ult comments, unit of measure and ar	y flagging of abnormal results.
Alert Action:	at and an		
Alert Action: Cancel Liver Function Test	storder		

Lab test	<u>Ordered</u> <u>within</u>
CBC w/Diff	8 hours
CBC no diff	8 hours
BMP	24 hours
CMP	24 hours
Liver Function Panel	24 hours
Magnesium Level	24 hours
Phosphorus Level	24 hours
Hemoglobin A1c	90 days



Medium example: Duplicate order alerts (if a "soft stop")

	Potential Duplicate Orders Found		x
Your New Order			
This germline genetic te germline genetic tests a	st was previously ordered and resulted. Du re usually not indicated.	plicate orders for	
Admark Phospho-Tau Total/Ab42 Existing Signed Order	Once today at 0840. ⊗	Do Not Order]
Admark Phospho-Tau Total/Ab42	Starting today at 0840. ⊗ Ordering provider: Pfeffer, Michael A., MD	Discontinue	
	~	C <u>o</u> ntinue X Can	cel



Strong example: specialty restrictions

Strong

Utilization report cards with peer or leadership review

Privileging specific tests to specialty providers

Laboratory formulary including sendout formulary

Requirement for high-level approval or consultation

Rules requirement

CPOE: Hard stops

- Orders for autoimmune encephalopathy antibody panels (>\$1000) must be ordered by a Neurologist
- Orders for serum allergen testing (strict CMS coverage criteria) must be ordered by an Allergist or a Pulmonologist
- Clinical exome sequencing requires genetic counseling prior to testing

It is only considered as "strong" if you have a way to enforce or gate-keep it via CPOE design or screening all orders, etc.



Strong example: test approval/consultation

Strong

Utilization report cards with peer or leadership review

Privileging specific tests to specialty providers

Laboratory formulary including sendout formulary

Requirement for high-level approval or consultation

Rules requirement CPOE: Hard stops

Care Guidance (1)

According to <u>HS Policy 3169</u>, ordering this inpatient genetic test first requires a discussion with a Molecular Diagnostics Laboratory (MDL) director to ensure that it is the most appropriate test to assess the condition of interest.

D Please enter the details in the Consult to Genetic Testing, and an MDL director will contact you by the close of the next business day.

If you override the defaults below to keep ordering the genetic test, another alert will prevent you from signing the order.

Remove	Keep	Fragile X Repeat Analysis Routine, Once, today at 0850, For 1 occurrence Clinical history/indications for procedure (rec
pply the following	ng?	
Order	Do Not Order	Consult to Genetic Testing

- A genetic test order on an inpatient prompts the provider to cancel the order and add a "Consult to Genetic Testing."
- Once the Consult is complete, and if the request approved from a Molecular Medical Lab Director, only then will the order go through.



Strong example: test approval/consultation

	Impact of a Pathology Re	Impact of a Pathology Resident Case Review Process on Cost Reduction of Expensive Send-Out To Large Public Hospital Emily T. Lo, D.O., Allison B. Chambliss, PhD LAC+USC Medical Center, Los Angeles, CA					
Strong	2.5 year ret	2.5 year retrospective review at LAC+USC*					
Utilization report cards with peer or leadership review	Expensive	Total # of	% of requests	Total			
Privileging specific tests to specialty providers	send-out tests	requests	diverted	cost savings			
Laboratory formulary including send- out formulary	Test 1	25	12%	\$3,000			
Requirement for high-level approval or consultation	Test 2	67	24%	\$18,505			
Rules requirement CPOE: Hard stops	Test 3	94	22%	\$16,170			
	All tests	366	15%	\$56,237			
CPOE: Hard stops	Iest 3 All tests	94 366 t included in and	22% 15%	\$16,170 \$56,237			

*molecular tests not included in analysis



Strong example: send-out formulary

Strong

Utilization report cards with peer or leadership review

Privileging specific tests to specialty providers

Laboratory formulary including sendout formulary

Requirement for high-level approval or consultation

Rules requirement

CPOE: Hard stops

UCLA Health

Request for a New Send Out (Reference Lab) Test

In accordance with HS 1309, please submit the completed form to the <u>Smartsheet portal</u> to request approval for a new test that is not orderable in CareConnect.

The Department of Pathology and Laboratory Medicine has a process for evaluating new test requests and qualifying reference laboratories to ensure quality of patient care, as well as compliance with accreditation requirements and applicable State/Federal laws including, but not limited to, possession of CLIA certification and a California State Laboratory license. The review process for a new laboratory test may take approximately 8-10 weeks. Avoid collecting the specimen until the request has been approved. For urgent requests, please also send a copy of the form to LabSupportMngmntGrp@mednet.ucla.edu.

Date request submitted:						
NEW LABORATORY TEST INFORMATION						
Test name:						
Medical justification:						
Patient population:						
Is this test being requested to replace a current test? □ Yes □ No						
Test Code:	CPT/MolDx Codes:					
Estimated Annual Test Volume:	Estimated Cost Per Test:					
TESTING LABORATORY INFORMATION						
Lab Name:						
Lab Address:						
Why does this test need to be performed by the above named laboratory?						
□ Not applicable. Requested test could be performed by a UCLA Clinical Laboratory.						
□ Sole provider of the test.						
Higher quality results (Explain in "Additional Comments" section below.)						
Shorter turn-around-time (Explain in "Additional Comments" section below.)						
Other reason (Explain in "Additional Comments" section below.)						
Additional Comments:						



Strong example: send-out formulary





Strong example: CPOE hard stops

Strong

Utilization report cards with peer or leadership review

Privileging specific tests to specialty providers

Laboratory formulary including sendout formulary

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Rules requirement

CPOE: Hard stops

Validation						SPACES ARCENTE
he following inform	mation is missing	or may need your attention				
Warning:						
This lab test has I 24 hours. If you fe HGB A1C was	been ordered in the rel you need to over a ordered on 5/13/10	last 24 hours; repeat testing i ride the alert please call Lab 0 at 1:10 PM by provider KNO	s usually lient Ser	not warranted vices (216-44	i for this analy 4-5733).	te within
	Date/Time	Component	Result	Ref Range	Flag	
	5/13/10 1:37 PM	Hemoglobin A1C	7.2	4.0 - 6.0 %	н	
	5/13/10 1:37 PM	Estimated Average Glucose	160	mg/dL		
	2	These orders cannot be acc	epted.			
		20				



Procop et al. AJCP (2014)

Strong example: CPOE hard stops

Strong

- Utilization report cards with peer or leadership review
- Privileging specific tests to specialty providers
- Laboratory formulary including sendout formulary
- Requirement for high-level approval or consultation

Rules requirement

CPOE: Hard stops

- >1200 tests not allowed more than once per 24 h
- 2-year data review:
 - 11,790 test orders blocked
 - Clinician called to request the test still be run 3% of the time
 - Cost savings of \$183,586
 - No adverse events



What about targeting <u>under</u>-utilization?

"I receive lots of requests to prevent underutilization in response to external quality programs and internal safety incidents:

- Hgb A1c for patients diagnosed with diabetes
- PTH for patients with repeated hypercalcemia
- INR levels for patients on warfarin
- Blood cultures for patients suspected of sepsis

I get much fewer requests to prevent overutilization...

-Eric Cheng, MD

CMIO, UCLA Health



"Sepsis lactate" at UCLA

CMS Core Measure SEP-1: Early Management Bundle, Severe Sepsis/Septic Shock

Severe Sepsis

Within three hours of presentation

• An initial lactate level measurement must be obtained. If the results are >4mmol/L, resuscitation with 30ml/kg crystalloid fluids should be started

- · Blood cultures drawn prior to antibiotic administration
- Broad spectrum or other antibiotics must be administered
- Within six hours of presentation

Repeat lactate level measurement should be done if the initial lactate measurement was elevated (> 2mmol/L).

Lactate Panel	1
To evaluate patients for sepsis or infection please order Sepsis Lactate. If Sepsis Lactate is >18 mg/dL, a repeat lactate level will automatically be performed per CMS Sepsis Bundle requirements (SEP-1).	
 Sepsis Lactate Lactate 	

>18 mg/dL



Lab Stewardship: What works well

- Multidisciplinary lab committee
- High-level oversight committee and clinical leadership champions
- Pathology is included in health system strategy planning
- A program manager(s) dedicated to stewardship and quality
- Faculty and staff dedicated to:
 - Stewardship
 - Quality
 - Informatics



Lab Stewardship: Remaining challenges

- Genetic testing
- Expanding health systems
 - Mergers and acquisitions
- Access to data
- Quantifying successes
 - Benchmarking
 - Outcomes





Questions?

