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Dear Pathology Stakeholder

NATIONAL PATHOLOGY ACCREDITATION ADVISORY COUNCIL
DRAFT ACCREDITATION STANDARD FOR PUBLIC CONSULTATION

This letter is to advise you that the National Pathology Accreditation Advisory Council (NPAAC) has released the following draft document for your consideration:

- *Requirements for Use of Digital Images as an Alternative to Direct Microscopy (First Edition 20xx)*

A copy of the draft Requirements can be downloaded from [NPAAC Documents for public consultation](#) on the NPAAC website.

To facilitate the consideration process, it would be appreciated if all comments could be submitted using the [NPAAC public consultation submissions template](#) that can be accessed from the aforementioned webpage.

The public consultation period closes on **5 March 2021**.

Background

NPAAC is a ministerially appointed expert committee that provides advice to all levels of government on matters relating to pathology accreditation, including pathology quality issues. One of its key responsibilities is the development, maintenance and monitoring of pathology accreditation materials. All pathology accreditation standards reflect a risk based approach with the aim of mitigating potential risks to patient safety.

In performing this role, NPAAC establishes expert, technical drafting committees to develop new or to revise existing accreditation standards. Part of the usual document review process is to release the draft documents for public consultation to facilitate the finalisation of the standards.

Requirements for Use of Digital Images as an Alternative to Direct Microscopy (First Edition 20xx)

The *Requirements for Use of Digital Images as an Alternative to Direct Microscopy (First Edition 20xx)* sets out minimum best practice standards for the use of digital pathology, in particular relating to anatomical pathology but also other morphological disciplines such as haematology with regard to microscopic examination of peripheral

blood and bone marrow specimens and microscopy in microbiology. This primarily concerns the use of whole slide imaging but also encompasses use of telepathology where digital cameras operated manually or remotely transmit images.

The purpose of the document is to provide a framework whereby these technologies, particularly whole slide imaging, can be introduced for microscopic diagnosis, not inhibiting innovation while protecting patient safety.

The potential risks associated with this technology has been identified and addressed within the Standard.

These standards do not address areas where the original image is already in digital form such as electron microscopy and cytogenetics or the use of these technologies in education or examination environments. Nor does the Standard cover clinical images or macroscopic images of surgical specimens or microbiological plates

Submissions

NPAAC is seeking views on the revised scope of the document from the pathology sector and other interested parties to assist with the finalisation of the accreditation standard. It would be appreciated if you could provide:

- an indication of whether the document is acceptable in its current form
- technical comments and/or suggestions on any possible revisions to the document
- comments on potential associated costs and supporting documentation, if any, in relation to compliance with proposed requirements, or
- a *nil response* if your organisation has no comment on the draft document.

Submissions should identify the relevant NPAAC document and be forwarded to the NPAAC Secretariat (NPAAC@health.gov.au) using the [Public Consultation Phase Submission Form](#).

All comments must be received by **5 March 2021** to ensure that feedback can be considered by the relevant technical drafting committee. Please be advised that late submissions **will not** be considered in the current round of public consultation.

Should you have any further queries, please contact Ms Suzanne Petrie, Director, Pathology Quality Section on (02) 6289 8131 or Email - npaac@health.gov.au.

Yours sincerely

Authorised for e-transmission

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Chair, NPAAC
15 January 2021