



SUSAN FANELLI  
Acting Director

State of California -- Health and Human Services Agency  
**California Department of Public Health**



GAVIN NEWSOM  
Governor

August 22, 2019

Administrator  
LAC+USC Medical Center  
1200 N State St  
Los Angeles, CA. 90033

**APPROVAL OF PROGRAM FLEXIBILITY**

Dear Administrator;

This letter is in response to the request submitted by LAC+USC Medical Center for program flexibility for California Code of Regulations Title 22 (CCR) section T22 DIV5 CH1 ART3-70223(g).

The alternative means of compliance with Title 22 CCR section T22 DIV5 CH1 ART3-70223(g) include to exempt certain specimen from the pathological examination.

Your request for program flexibility of Title 22 CCR T22 DIV5 CH1 ART3-70223(g) is approved under the following conditions:

1. The program flexibility would be exercised at the discretion of the surgeon who has examined the specimen and concluded further examination would not contribute to the patient care, including:
  - \* Skin or other normal tissue removed during a cosmetic or reconstructive procedure (e.g. blepharoplasty, cleft palate repair, abdominoplasty, rhytidectomy), is exempt provided it is not contiguous with a lesion and the patient does not have a history of malignancy. However, in view of the prevalence of premalignant lesions in the breast, breast tissue reduction mammoplasties will be examined both grossly and microscopically.
  - \* Fat removed from liposuction is exempt.
  - \* Skin from minor wound or burn debridement is exempt.
  - \* Foreskin from circumcision on newborn is exempt.
  - \* Placenta from normal vaginal delivery is exempt.
  - \* Intrauterine contraceptive devices without attached tissue is exempt.
  - \* Normal toenails and fingernails that are incidentally removed is exempt.
  - \* Tissue for research is NOT exempt; however, the Institutional Review Board (IRB) may authorize certain research biopsies to be collected without examination by Pathology provided that the protocol has been approved by Pathology and the biopsy is not expected to lead to a diagnosis and/or impact patient management.
2. The hospital has adopted a written policy titled Pathology Exempt Policies which have been approved by the Medical Executive Committee and assured an

AUG-28 2019 9:05

Licensing and Certification Program, Orange County District Office  
681 S Parker St, Ste 200, Orange, CA  
Phone: (714) 567-2906  
Internet Address: [www.cdph.ca.gov](http://www.cdph.ca.gov)





State of California -- Health and Human Services Agency  
California Department of Public Health



alternative method of meeting the requirements is provided.

3. The material not submitted will be adequately described and documented in the health record.
4. The term "adequately described" will be defined (i.e. size, color, shape, ect.) by the medical staff.

Either this letter or a true copy thereof shall be posted immediately adjacent to the facility's license.

This approval shall remain in effect from 08/15/2019 until 08/14/2021.

**NOTE:** The Department may revoke the program flexibility if the licensee does not comply with the conditions set forth in the approval or if the department determines the proposed alternative does not adequately meet the intent of the regulations.

If you have any questions, please contact Hang Nguyen at (714) 567-2906 or by email at [Hang.Nguyen@cdph.ca.gov](mailto:Hang.Nguyen@cdph.ca.gov).

Sincerely,

Hang Nguyen, RN, MSN, District Manager  
Orange County District Office

