Ambulatory Surgery Center Hot Topics: Trending Issues in ASCs

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Trending Hot Topics

- Infection Control
- Emergency Preparedness
- Nursing Organization
- QAPI (Quality Assurance, Performance Improvement)







Infection Control





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Infection Control

• Conformance with nationally recognized infection control guidelines:

8:43 A-14.3 (a) – "Infection prevention activities shall be based on the Centers for Disease Control and Prevention Guidelines…"

8:43 A-14.4 (a) – "Methods for processing reusable medical devices shall conform with the following: 1 – 7. The Association for the Advancement of Medical Instrumentation (AAMI)...

8. Society of Gastroenterology Nurses and Associates (SGNA)

Fed Q 242 – Infection Control Program





Sterilizer Validation Testing

- Must be performed during initial set-up and after major repair
- Follow AAMI ST 79 for proper sequence of testing
- Must maintain documentation





Manufacturer's Instructions for Use (IFUs)

- 8:43 A 14.4(g) "The manufacturer's instructions for cleaning, testing, disassembly, and sterilization of equipment shall be readily available and followed by employees."
- During sterilization, must follow device IFU
- Contact manufacturer if IFU does not specify cleaning or sterilization parameters
- Fed Q 242 Infection Control Program





Transportation of Soiled Instruments

- AAMI ST 79 Instruments must be transported in containers that are closable, puncture-resistant, and leak-proof on the bottom and sides.
- Transport in a manner that prevents spillage or tipping
- Must have a biohazard label





Off-Site Instrument Reprocessing

- 8:43A 14.4 (I) 3 "If the facility retains an outside firm to provide its sterile processing, a quality control program shall be established to ensure the delivery of a safe product as specified in the contract with the third party processor."
- Must have contract!
- Follow AAMI ST 79 for guidelines on the transportation of soiled instruments for off-site reprocessing
- Fed Q 242 Infection Control Program





Preparation of Multi-Dose Vials (MDVs) in Immediate Patient Care Areas

- If MDVs prepared in patient care areas, must be used as singledose vials
- Med prep areas located in immediate patient care areas MUST be cleaned between patients
- Medications cannot be prepared near sinks





Room Turnover Cleaning/Terminal Cleaning

- 8:43A-12.6 (a) (16) (v): "Policies and procedures regarding infection prevention and control shall be reviewed at least every three years... including but not limited to, the following... v. Cleaning of the operating room after each procedure including documentation of training in cleaning the surgical suite..."
- Room turnover cleaning must begin after the patient leaves the OR
- Must show evidence of education and training for contracted housekeeping staff
- Fed Q241 Sanitary Environment





Emergency Preparedness







Four Provisions for All Provider Types





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Risk Assessment And Planning

- Develop an emergency plan based on a risk assessment.
- Perform risk assessment using an "all-hazards" approach, focusing on capacities and capabilities.
- Update emergency plan at least annually.





All Hazards Approach:

An all-hazards approach is an integrated approach to emergency preparedness planning that focuses on capacities and capabilities that are critical to preparedness for a full spectrum of emergencies or disasters, including internal emergencies and a man-made emergency (or both) or natural disaster. This approach is specific to the location of the provider or supplier and considers the particular type of hazards most likely to occur in their areas. These may include, but are not limited to, care-related emergencies, equipment and power failures, interruptions in communications, including cyber-attacks, loss of a portion or all of a facility, and interruptions in the normal supply of essentials such as water and food.





Nursing Organization







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Nursing Organization

8:43 A – **13.4 (a):** *"All orders for patient care shall be prescribed in writing and signed and dated by the prescriber..."*

Fed Q141 - Nursing Organization & Staffing

 Common deficiencies included failing to provide nursing services in accordance with recognized standards of practice.





Quality Assurance Performance Improvement (QAPI)





QAPI Program

- 8:43 A 18.1 (a): "The facility shall establish and implement a written plan for a quality assurance program for patient care...The plan shall specify... the individual responsible for coordinating the quality assurance program and shall provide for ongoing monitoring or staff and patient care services."
- CMS requires focus on high-risk, high-volume areas
- Annual QAPI project
- Fed Q 081 Program Scope
- Fed Q 083 Performance Improvement Projects





Thank you!

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