

CMS HOSPITAL CONDITIONS OF PARTICIPATION (COPS) 2017

Surgery, PACU and Anesthesia Standards

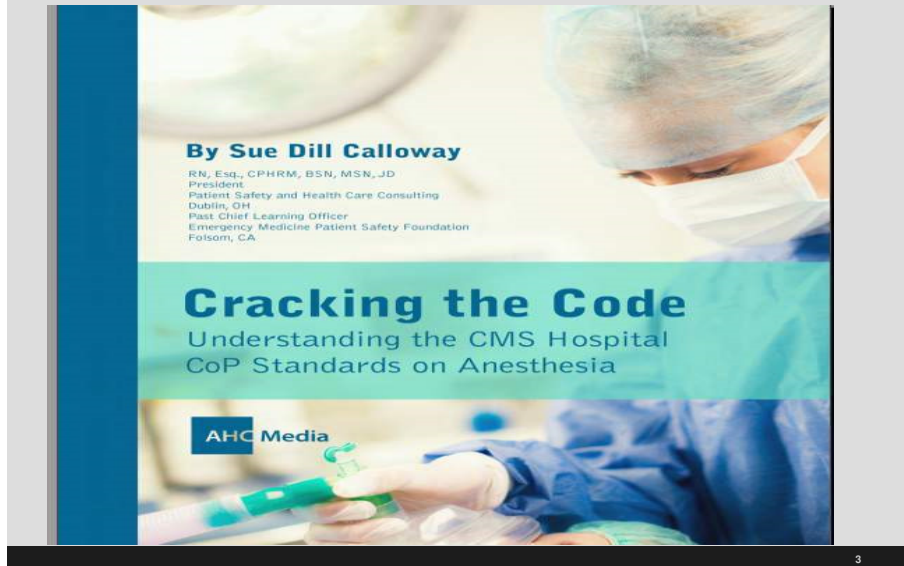


Speaker



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- sdill1@columbus.rr.com
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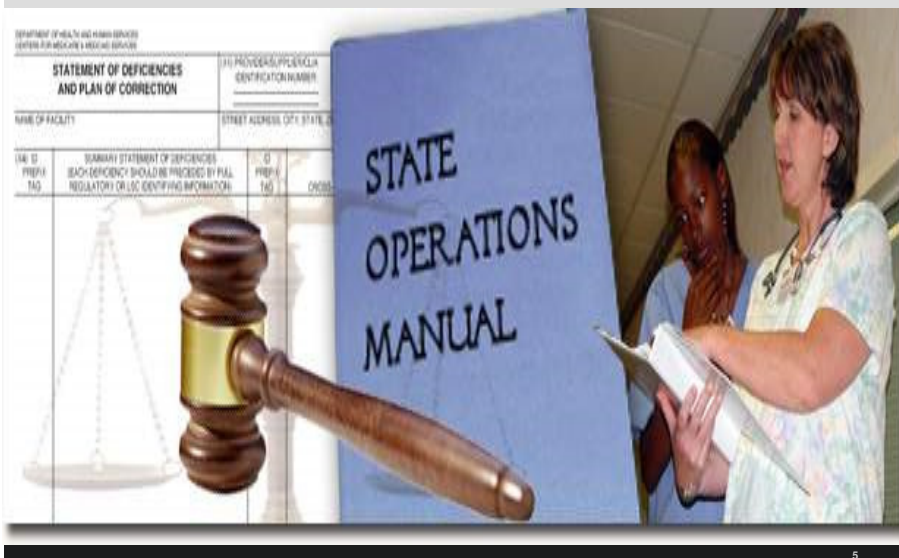
Author of Book on the CMS Anesthesia Standards



Introduction



You Don't Want One of These



The Conditions of Participation (CoPs)

- Many revisions since first published in 1986
- Manual updated more frequently now
 - Tag numbers go from 1 to 1164
- First regulations are published in the **Federal Register** then CMS publishes the **Interpretive Guidelines** and some have **survey procedures** ²
 - Hospitals should check this website once a month for changes to see if updated manual, survey memos or transmittals

¹ <http://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR>

² www.cms.hhs.gov/SurveyCertificationGenInfo/PMSR/list.asp

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CMS Survey and Certification Website

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Policy & Memos to States and Regions

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CMS Survey and Certification memoranda, guidance, clarifications and instructions to State Survey Agencies and CMS Regional Offices.

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Click on Policy & Memos

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CMS Survey Memos

Policy & Memos to States and Regions

CMS Survey and Certification memoranda, guidance, clarifications and instructions to State Survey Agencies and CMS Regional Offices.

Show entries: 10

Filter On:

Title	Memo #	Posting Date	Fiscal Year
Implementation Issues, Long-Term Care Regulatory Changes: Substandard Quality of Care (SQC) and Clarification of Notice before Transfer or Discharge Requirements	17-27-NH	2017-05-12	2017
Psychiatric Residential Treatment Facilities (PRTF) Frequently Asked Questions (FAQs)	17-28-PRTF	2017-05-12	2017
Notice of Proposed Regulation Changes to Requirements Related to Survey Team Composition and Investigation of Complaints	17-26-NH	2017-04-28	2017
Electronic Staffing Submission - Payroll-Based Journal Update	17-25-NH	2017-04-21	2017
Notice of Proposed Regulation Changes for Accrediting Organizations (AOs) Transparency and Termination Notices	17-24-ALL	2017-04-14	2017

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CMS Transmittals

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PDF

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2015 Transmittals

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2013 Transmittals

CMS Program Memoranda

2017 Transmittals

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Show entries: 10

Filter On:

Transmittal #	Issue Date	Subject	Implementation Date	CR #	MM Article #	MM Article Release Date
SE17002		Additional Guidance for Clinical Laboratories as Data Reporting Begins			SE17002	2017-01-04
SE17004		Revised Centers for Medicare & Medicaid Services (CMS) 855S Application – Durable Medical Equipment, Prosthetics, Orthotics			SE17004	2017-01-05

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Medicare State Operations Manual



Appendix

Email questions to CMS hospitalscg@cms.hhs.gov

- Each Appendix is a separate file that can be accessed directly from the SOM Appendices Table of Contents, as applicable.
- The appendices are in PDF format, which is the format generally used in the IOM to display files. Click on the red button in the 'Download' column to see any available file in PDF.
- To return to this page after opening a PDF file on your desktop, use the browser "back" button. This is because closing the file usually will also close most browsers

New website at

www.cms.hhs.gov/manuals/downloads/som107_Appendixtoc.pdf

App. No.	Description	PDF File
A	Hospitals	 2,185 KB
AA	Psychiatric Hospitals	 606 KB

CoP Manual Also Called SOM

State Operations Manual Appendix A - Survey Protocol, Regulations and Interpretive Guidelines for Hospitals

Table of Contents
(Rev. 151, 11-20-15)

www.cms.hhs.gov/manuals/downloads/som107_Appendixtoc.pdf

[Transmittals for Appendix A](#)

Survey Protocol

Introduction

- [Task 1 - Off-Site Survey Preparation](#)
- [Task 2 - Entrance Activities](#)
- [Task 3 - Information Gathering/Investigation](#)
- [Task 4 - Preliminary Decision Making and Analysis of Findings](#)
- [Task 5 - Exit Conference](#)
- [Task 6 - Post-Survey Activities](#)

Psychiatric Hospital Survey Module

Psychiatric Unit Survey Module

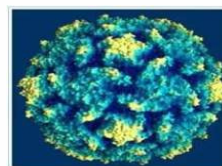
Rehabilitation Hospital Survey Module

Inpatient Rehabilitation Unit Survey Module

Hospital Swing-Bed Survey Module

Regulations and Interpretive Guidelines

Email questions
hospitalscg@cms.hhs.gov



CMS Survey Memos Issued

- IV, Medications, Safe Opioid Use
- Emergency Preparedness Checklist and Emergency Preparedness
- Radiology and Nuclear Medicine
- Hospital Equipment Maintenance
- Privacy and confidentiality, CRE and ERCP
- Complaint manual updated
- Access to hospital deficiency data
- Use of insulin pens issue
- Single dose and infection control breaches
- Humidity in OR and second memo on effect of low humidity
- Reporting to internal PI
- Luer Misconnections

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CMS Memo on Safe Injection Practices



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CMS Memo on Safe Injection Practices

- June 15, 2012 CMS issues a 7 page memo on safe injection practices
- Discusses the safe use of single dose medication to prevent healthcare associated infections (HAI)
- Notes new exception which is important especially in medications shortages
- General rule is that single dose vial (SDV) can only be used on one patient
- Will allow SDV to be used on multiple patients if prepared by pharmacist under laminar hood following USP 797 guidelines

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Single Dose CMS Memo

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
1900 Security Boulevard, Mail Stop C2-24-16
Baltimore, Maryland 21244-1899



Office of Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 12-35-ALL

DATE: June 15, 2012

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Safe Use of Single Dose/Single Use Medications to Prevent Healthcare-associated Infections

Memorandum Summary

- Under certain conditions, it is permissible to repack single-dose vials or single use vials (collectively referred to in this memorandum as "SDVs") into smaller doses, each intended for a single patient. The United States Pharmacopeia (USP) has established standards for compounding which, to the extent such practices are also subject to regulation by the Food and Drug Administration (FDA), may also be recognized and enforced under §§501 and 502 of the Federal Food, Drug and Cosmetics Act (FDCA). These USP compounding standards include USP General Chapter 797, *Pharmaceutical Compounding - Sterile Preparations* ("USP <797>"). Under USP <797>, healthcare facilities may repack SDVs into smaller doses, each intended for use with one patient. Among other things, these standards currently require that:
 - The facility doing the repackaging must use qualified, trained personnel to do so, under International Organization for Standardization (ISO) Class 5 air quality conditions within an ISO Class 7 buffer area. All entries into a SDV for purposes of repackaging under these conditions must be completed within 6 hours of the initial needle puncture.
 - All repackaged doses prepared under these conditions must be assigned and labeled with a beyond use date (BUD), based on an appropriate determination of contamination risk level in accordance with USP <797>, by the licensed healthcare professional supervising the repackaging process.
- *Adaptation: derive from one SDV to multiple patients without adherence to USP <797>*

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CMS Memo on Safe Injection Practices

- All entries into a SDV for purposes of repackaging must be completed with 6 hours of the initial puncture in pharmacy following USP guidelines
- Only exception of when SDV can be used on multiple patients
- Otherwise using a single dose vial on multiple patients is a violation of CDC standards
- CMS will cite hospital under the hospital CoP infection control standards since must provide sanitary environment
 - Also includes ASCs, hospice, LTC, home health, CAH, dialysis, etc.

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CMS Memo on Safe Injection Practices

- Bottom line is you can not use a single dose vial on multiple patients
- CMS requires hospitals to follow nationally recognized standards of care like the CDC guidelines
- SDV typically lack an antimicrobial preservative
- Once the vial is entered the contents can support the growth of microorganisms
- The vials must have a beyond use date (BUD) and storage conditions on the label

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CMS Memo on Safe Injection Practices

- So if they make it in a single dose vial, you need to buy it in a single dose vial
- If they do not then if use multi-dose vial try and use it on one patient only
- Mark the multi-dose vial expires in 28 days unless sooner by manufacturer
- Do not want you to take multi-dose vials into the OR so if you do treat it as a single dose and dispose of it at the end of the case
- Clean off top when opening vial

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Safe Injection Practices Posters



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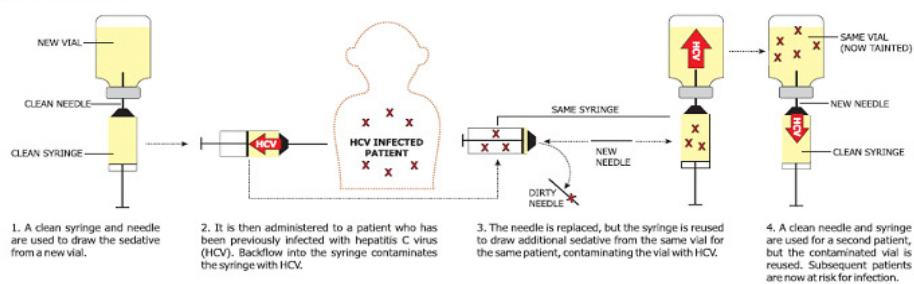
ISMP IV Push Medication Guidelines



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Unsafe Injection Practices and Disease Transmission

Reuse of syringes combined with the use of single-dose vials for multiple patients undergoing anesthesia can transmit infectious diseases. The syringe does not have to be used on multiple patients for this to occur.



Source: www.southernnevadahealthdistrict.org

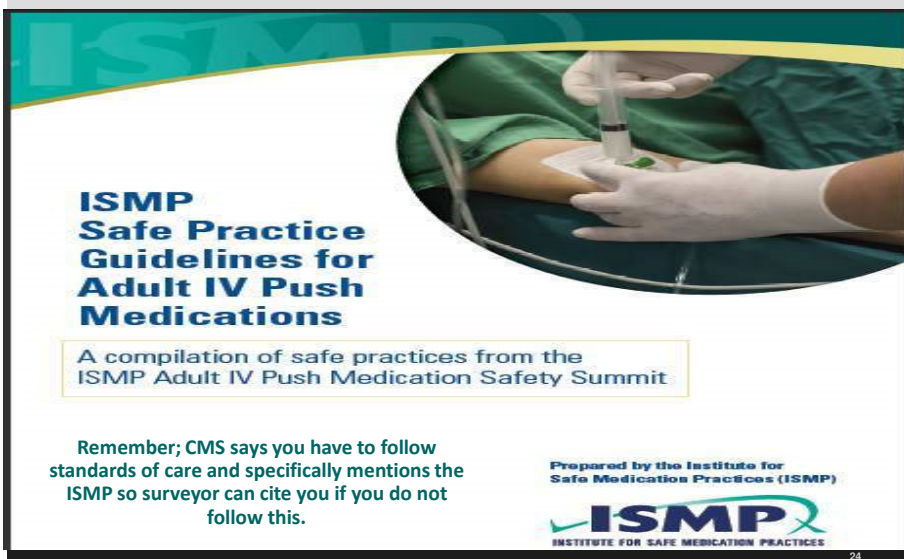


ISMP IV Push Medications Guidelines

- ISMP has published a 26 page document called “ISMP Safe Practice Guidelines for Adult IV Push Medications
- The document is organized into factors that increase the risk of IV push medications in adults,
 - Current practices with IV injectible medications
 - Developing consensus guidelines for adult IV push medication and
 - Safe practice guidelines
 - About 90% of all hospitalized patients have some form of infusion therapy

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IV Push Medicine Guidelines



ISMP
Safe Practice
Guidelines for
Adult IV Push
Medications

A compilation of safe practices from the
ISMP Adult IV Push Medication Safety Summit

Remember; CMS says you have to follow
standards of care and specifically mentions the
ISMP so surveyor can cite you if you do not
follow this.

Prepared by the Institute for
Safe Medication Practices (ISMP)

ISMP
INSTITUTE FOR SAFE MEDICATION PRACTICES

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IV Push Medications Guidelines

- Provide IV push medications in a ready to administer form
- Use only commercially available or pharmacy prepared prefilled syringes of IV solutions to flush and lock vascular access devices
- If available in a single dose vial then need to buy in single dose vial
- Aseptic technique should be used when preparing and administering IV medication
 - This includes hand hygiene before and after administration

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IV Push Medications Guidelines

- The diaphragm on the vial should be disinfected even if newly opened
 - The top should be cleaned using friction and a sterile 70% isopropyl alcohol, ethyl alcohol, iodophor, or other approved antiseptic swab for at least ten seconds to it dry
 - Medication from glass ampules should be used with a filter needle unless the specific drug precludes this
- Medication should only be diluted when recommended by the manufacturer or in accordance with evidence based practice or approved hospital policies

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IV Push Medications Guidelines

- If IV push medication needs to be diluted or reconstituted these should be performed in a clean, uncluttered, and separate location
- Medication should not be withdrawn from a commercially available, cartridge type syringe into another syringe for administration
- It is also important that medication not be drawn up into the commercially prepared and prefilled 0.9% saline flushes
 - This are to flush an IV line and are not approved to use to dilute medication

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3.6 Do NOT dilute or reconstitute IV push medications by drawing up the contents into a commercially-available, prefilled flush syringe of 0.9% sodium chloride.

Discussion: Commercially available prefilled syringes of saline and heparin are regulated by the US Food and Drug Administration as *devices*, not as medications. These devices have been approved for the flushing of vascular access devices, but have NOT been approved for the reconstitution, dilution, and/or subsequent administration of IV push medications. Such use would be considered “off label” and not how manufacturers intended these products to be used, nor have prefilled flush syringes been tested for product safety when used in this manner.

Warnings intended to limit the use of prefilled syringes for medication preparation and administration appear on some syringe barrels, clearly stating “IV flush only.” Some manufacturers have also limited or removed the gradation markings on the prefilled flush syringes in order to prevent measurement of a secondary medication in the flush syringe. When prefilled syringes are used in an off-label manner, the practitioner and employer bear the legal liability for any adverse events occurring from this practice.³¹

The mislabeling that occurs when medications are added to a prefilled syringe and a secondary label is not applied creates significant risk for errors. In many cases, the manufacturer’s label is permanently affixed to the syringe barrel and contains product codes and a barcode as well as specific information about the fluid and its volume. When another medication is added to this syringe, there is no adequate method to amend the manufacturer’s label, without covering the current information.³¹ Thus, the syringe frequently remains labeled as 0.9% sodium chloride, when it also contains the diluted or reconstituted medication.

Although this unsafe practice is widespread, and many who use it mistakenly believe the risk of an error is insignificant—a belief clearly reinforced during public comment regarding this guidance statement—summit participants arrived at a consensus that the practice must be eliminated.

3.7 When necessary to prepare more than one medication in a single syringe for IV push administration

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IV Push Medications Guidelines

- Combination of more than one medication in a single syringe is seldom necessary and could result in unwanted changes in the medication
- Never use IV solution or mini bags as a common source to flush an IV as to dilute for more than one patient
- Label syringes of IVP medication unless prepared and immediately given with no break
- Administer IV push medication at rate recommended by manufacturer or supported by evidenced based practices and often given too fast

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CMS Infection Control Worksheet

Section on Safe Injection Practices



CMS Hospital Worksheets History

- October 14, 2011 CMS issues a 137 page memo in the survey and certification section and it was pilot tested in hospitals in 11 states
- Memo discusses surveyor worksheets for hospitals by CMS during a hospital survey
- Addresses discharge planning, **infection control**, and QAPI (performance improvement)
 - Final ones issued November 26, 2014
 - Has section on safe injection practices, antibiotic stewardship and surgery tracer

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Final 3 Worksheets QAPI

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

DATE: November 26, 2014

REF: S&C: 15-12-Hospital

TO: State Survey Agency Directors

[www.cms.gov/SurveyCertificationG
enInfo/PMSR/list.asp#TopOfPage](http://www.cms.gov/SurveyCertification/enInfo/PMSR/list.asp#TopOfPage)

FROM: Director
Survey and Certification Group

SUBJECT: Public Release of Three Hospital Surveyor Worksheets

Memorandum Summary



- **Three Hospital Surveyor Worksheets Finalized:** The Centers for Medicare & Medicaid Services (CMS) has finalized surveyor worksheets for assessing compliance with three Medicare hospital Conditions of Participation (CoPs): Quality Assessment and Performance Improvement (QAPI), Infection Control, and Discharge Planning. The worksheets are used by State and Federal surveyors on all survey activity in hospitals when assessing compliance with any of these three CoPs.
- **Final Worksheets Made Public:** Via this memorandum we are making the worksheets publicly available. The hospital industry is encouraged, but not required, to use the worksheets as part of their self-assessment tools to promote quality and patient safety.

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Infection Control Program and Resources

Module 1: Infection Prevention Program

Section 1.A. Infection Prevention Program and Resources

Elements to be assessed		
1.A.1 The hospital has designated one or more individual(s) as its Infection Control Officer(s).	<input type="radio"/> Yes <input type="radio"/> No	
1.A.2 The hospital has evidence that demonstrates the Infection Control Officer(s) is qualified and maintain(s) qualifications through education, training, experience or certification related to infection control consistent with hospital policy.	<input type="radio"/> Yes <input type="radio"/> No	
1.A.3 The Infection Control Officer(s) can provide evidence that the hospital has developed general infection control policies and procedures that are based on nationally recognized guidelines and applicable state and federal law.	<input type="radio"/> Yes <input type="radio"/> No	
If no to any of 1.A.1 through 1.A.3, cite at 42 CFR 482.42(a) (Tag A-748)		
1.A.4 The Infection Control Officer can provide an updated list of diseases reportable to the local and/or state public health authorities.	<input type="radio"/> Yes <input type="radio"/> No	
1.A.5 The Infection Control Officer can provide evidence that hospital complies with the reportable diseases requirements of the local health authority.	<input type="radio"/> Yes <input type="radio"/> No	
No citation risk for questions 1.A.4 and 1.A.5		
1.A.6 The hospital has infection control policies and procedures relevant to construction, renovation, maintenance, demolition, and repair, including the requirement for an infection control	<input type="radio"/> Yes <input type="radio"/> No	

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CMS Hospital Worksheets

- Hospitals should be familiar with the three worksheets
- Will use whenever a validation survey or certification survey is done at a hospital by CMS
- CMS says worksheets are used by State and federal surveyors on all survey activity in assessing compliance with any of the three CoPs
- Hospitals are encouraged by CMS to use the worksheet as part of their self assessment tools which can help promote quality and patient safety

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CMS Hospital Worksheets

- However, some of the questions asked might not be apparent from a reading of the CoPs
 - A worksheet is a good communication device
 - It will help clearly communicate to hospitals what is going to be asked in these 3 important areas
 - Anesthesia can **not** give single dose medications to more than one person unless prepared in pharmacy such as Diprivan (Propofol)
 - One needle, one syringe every time
 - Hospitals might want to consider putting together a team to review the 3 worksheets and complete the form in advance as a self assessment

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Section 2. B Injection Practices and Sharps Safety (Medications, Saline, Other Infusates)

Elements to be assessed	Manner of Assessment Code (check all that apply) & Surveyor Notes					
Injections are given and sharps safety is managed in a manner consistent with hospital infection control policies and procedures to maximize the prevention of infection and communicable disease including the following:						
2. B.1 Injections are prepared using aseptic technique in an area that has been cleaned and free of visible blood, body fluids, or contaminated equipment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
2. B.2 Needles are used for only one patient.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	
2. B.3 Syringes are used for only one patient (this includes manufactured prefilled syringes and insulin pens).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5	

11.00 x 8.50 in

Interview = 1 Observation = 2 Infection Control Document Review = 3 Medical Record Review = 4 Other Document Review = 5

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Infection Control Pilot

- CMS published proposed changes in the infection control worksheet as a pilot program in 2017
- The infection control worksheet was drafted to be used in long term care (LTC)
- However, proposed changes were made to the hospital infection control worksheet
- The plan was to use the draft worksheets and to do 40 hospitals to be paired with the LTC one
- CMS has provided copies of the draft infection control worksheets

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CMS Infection Control Pilot

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C 17-09-ALL

DATE: November 18, 2016
TO: State Survey Agency Directors
FROM: Director
Survey and Certification Group

www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Policy-and-Memos-to-States-and-Regions.html

SUBJECT: Infection Control Pilot: 2017 Update

Memorandum Summary

- **Project Overview:** The Centers for Medicare & Medicaid Services (CMS) is in the second year of a three year pilot project to improve assessment of infection control and prevention regulations in Long Term Care (LTC) facilities, hospitals, and during transitions of care. All surveys during the pilot will be educational surveys (no citations will be issued) and will be conducted by a national contractor.
- **Second Year Activities:** Using draft surveyor Infection Control Worksheets (ICWS) based on the new Long Term Care regulation as well as a revised hospital surveyor ICWS, 40 hospital surveys will be paired with surveys of LTC facilities, in order to provide an opportunity to assess infection prevention during transitions of care. In addition, CMS will pilot technical assistance opportunities for facilities in efforts to

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CMS Infection Control Pilot

- The survey memo is 64 pages long
- All surveys during the pilot will be educational
- No citations will be issued
- These are being conducted by a national contractor and not CMS surveyors
- As mentioned, 40 hospital surveys will be paired with surveys of LTC
- This is being done to assess infection prevention during the transition of care

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Injection Practices & Sharps Safety 2 B

- Injections prepared using aseptic technique in area cleaned and free of blood and bodily fluids
- Is rubber septum disinfected with alcohol before piercing?
- Are single dose vials, IV bags, IV tubing and connectors used on only one patient?
- Are multidose vials dated when opened and discarded in 28 days unless shorter time by manufacturer?
- Make sure expiration date is clear as per P&P
- If multidose vial found in patient care area must be used on only one patient

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Safe Injection Practices Patient Safety Brief



www.empsf.org

Safe Injection Practices Patient Safety Brief Emergency Medicine Patient Safety Foundation

By: Sue Dill Calloway RN MSN JD CPHRM
Ruth Carrico PhD RN FSHEA CIC

July 2012



The Centers for Disease Control and Prevention (CDC) says there are 1.7 million healthcare-associated infections in the US every year. Of these, it is estimated that about 99,000 deaths occur as a result. Infection prevention

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Emergency Physicians Insurance eXchange

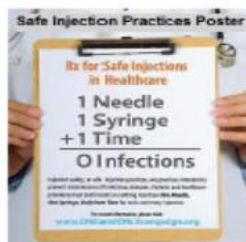
EPIX Patient Safety Briefs (Previously known as EPIX Email Alerts)

Safe Injection Practices in the Emergency Department

Written by Sue Dill Calloway RN MSN JD

Safe injection practices should be on the radar screen of all urgent care and emergency department physicians, midlevels and nursing staff. There is an increased focus on safe injection practices by regulators such as the Center for Medicare and Medicaid Services (CMS) in the hospital Conditions of Participations (CoPs) and accreditation organizations like the Joint Commission, DNV Healthcare, the Healthcare Facilities Accreditation Program (HFAP), and the Center for Improvement in Healthcare Quality (CIHQ). The recommendations have come from documents that are discussed in this brief and cited at the bottom of the article. It is recommended that this EPIX Patient Safety Brief be shared among physicians, midlevels, nursing staff, infection preventionists, and pharmacists.

On November 26, 2014 CMS issued three hospital surveyor worksheets. One of which is an infection control worksheet that contains a section on safe injection practices for hospitals. The worksheets are used during any validation or certification survey. CMS recently sent 110 surveyors to hospitals for two days to assess using the three CMS worksheets. CMS suggested that all hospitals use the worksheets as



Injection Practices & Sharps Safety

- Are all sharps disposed of in resistant sharps container?
- Are sharp containers replaced when fill line is reached?
 - Are sharps disposed of in accordance with state medical waste rules
- Hospitals should have a system in place where someone has the responsibility to check these and ensure they are replaced when they are full

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Not All Vials Are Created Equal

SINGLE-DOSE OR MULTI-DOSE?

NOT ALL VIALS ARE CREATED EQUAL.

Dozens of recent outbreaks have been associated with reuse of single-dose vials and misuse of multiple-dose vials. As a result of these incidents, patients have suffered significant harms, including death. CDC and the One & Only Campaign urge healthcare providers to recognize the differences between single-dose and multiple-dose vials and to understand appropriate use of each container type.

This information can literally save a life.



ONEANDONLYCAMPAIGN.ORG

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DO YOU PROVIDE TREATMENT FOR PATIENTS WITH CANCER?

PROTECT YOUR PATIENTS, YOURSELF, AND YOUR BUSINESS

Since 2002, at least nine serious infectious disease outbreaks have occurred in cancer clinics. These outbreaks involved unsafe injection practices, including the reuse of syringes. As a result, hundreds of patients became infected and thousands more required notification and testing for bloodborne pathogens.



REMEMBER! WHEN PREPARING MEDICATIONS AND INJECTIONS...

NEVER reuse these items:



Needles or syringes that have been used for any purpose



Vials with "single-dose vial" printed on the label



Saline bags



Intravenous tubing

ALWAYS follow aseptic technique* when:



Preparing any medication



Disinfecting a vial's septum



Accessing a central line



Injecting any medications

*Aseptic technique is used by health care workers to prevent the contamination of clean areas, equipment, and sterile medications. This will help prevent the spread of infection. Please refer to CDC's [Basic Infection Control and Prevention Plan for Outpatient Oncology Settings](#) for more information.



LEARN MORE ABOUT WAYS YOU CAN KEEP YOUR PATIENTS

The Safe Injection Practices Coalition Releases Two New Videos



Dear colleagues,
CDC continues to investigate outbreaks as a result of unsafe injection practices. These mistakes and knowledge gaps put healthcare providers and patients at risk. CDC's [One & Only Campaign](#) created [two short videos](#) to help make healthcare safer, one injection at a time.

- [Check Your Steps! Make Every Injection Safe](#) - For Healthcare Providers, 3:45
- [Managing Patient Safety, One Injection at a Time](#) - For Healthcare Managers, 2:33

These videos detail critical information to help all providers and facility managers double check their injection safety knowledge

Get Connected

with the *One & Only Campaign*! There are several ways to follow us, join the conversation, and receive updates:

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The CDC on Safe Injection Practices



CDC on Infection Control

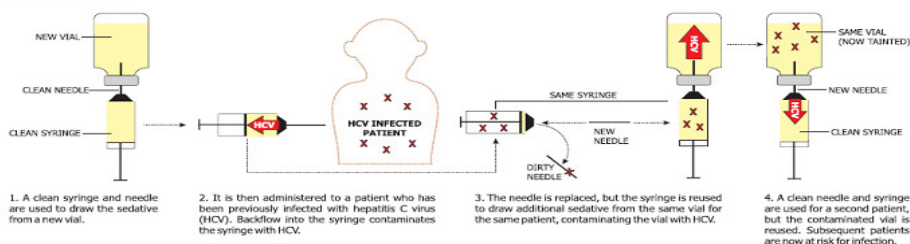


- The CDC says there are 1.7 million healthcare infection (HAI) in America every year
 - There are 75,000 deaths in American hospitals every year
 - Healthcare-Associated Infections (HAIs) are one of the top ten leading causes of death in the US.
- Leadership need to make sure there is adequate staffing and resources to prevent and manage infections
- Issue came to light in Nevada after GI doctor reuses syringes to save money in two ambulatory clinics

How Did This Issue Get Started?

Unsafe Injection Practices and Disease Transmission

Reuse of syringes combined with the use of single-dose vials for multiple patients undergoing anesthesia can transmit infectious diseases. The syringe does not have to be used on multiple patients for this to occur.



Source: www.southernnevadahealthdistrict.org



CDC 10 Safe Injection Practices

- CDC has a publication called 2007 Guideline for Isolation Precautions: Preventing Transmission of Infectious Agents in Healthcare Settings
- Has a section on Safe Injection Practices (III.A.1.b. and starts on page 68) which has the **10 safe injection practices**
- Discusses four large outbreaks of HBV and HCV among patients in ambulatory facilities
- Identified a need to define and reinforce safe injection practices

www.cdc.gov/hicpac/pdf/isolation/Isolation2007.pdf

10 CDC Standards Safe Injection Practices

Injection Safety

Injection Safety

- CDC's Role
- CDC Statement
- Information for Providers
- Information for Patients
- Preventing Unsafe Injection Practices
- Safe Injection Practices**
 - CDC Clinical Reminder: Spinal Injection Procedures
 - Infection Prevention during Blood Glucose Monitoring and Insulin Administration
 - Recent Publications
 - Recent Meetings
 - The One & Only Campaign

Related Links

- [One & Only Campaign](#)
- [HICPAC](#)


[Injection Safety > Preventing Unsafe Injection Practices](#)

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Safe Injection Practices to Prevent Transmission of Infections to Patients

Download the complete [2007 Guideline for Isolation Precautions: Preventing Transmission of Infectious Agents in Healthcare Settings](#) [PDF - 3.80 MB]

III.A.1.b. Safe Injection Practices The investigation of four large outbreaks of HBV and HCV among patients in ambulatory care facilities in the United States identified a need to define and reinforce safe injection practices 453. The four outbreaks occurred in a private medical practice, a pain clinic, an endoscopy clinic, and a hematology/oncology clinic. The primary breaches in infection control practice that contributed to these outbreaks were 1) reinsertion of used needles into a multiple-dose vial or solution container (e.g., saline bag) and 2) use of a single needle/syringe to administer intravenous medication to multiple patients. In one of these outbreaks, preparation of medications in the same workspace where used needle/syringes were dismantled also may have been a contributing factor. These and other outbreaks of viral hepatitis could have been prevented by adherence to basic principles of aseptic technique for the preparation and administration of parenteral medications 453, 454. These include the use of a sterile, single-use, disposable needle and syringe for each injection given and prevention of contamination of injection equipment and medication.



Contact Us:

Centers for Disease Control and Prevention
1600 Clifton Rd
Atlanta, GA 30333
800-CDC-INFO (800-232-4636)
TTY: (888) 232-6348
[Contact CDC-INFO](#)

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Wear a Mask Wear A Mask Wear A Mask

- Need to wear a mask to prevent bacterial meningitis
- During all spinal injection procedures
- During all injections into epidural or subdural space
 - Myelogram
 - Intrathecal chemotherapy
 - Administration of spinal or epidural anesthesia
 - LP done in the emergency department
- Bottom line is facemasks need to be worn by healthcare providers performing these procedures

Spinal Injection and Masks

Injection Safety

CDC's Role

CDC Statement

Information for Providers

Information for Patients

Preventing Unsafe Injection Practices

Safe Injection Practices

CDC Clinical Reminder: Spinal Injection Procedures

Infection Prevention during Blood Glucose Monitoring and Insulin Administration

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CDC Clinical Reminder: Spinal Injection Procedures Performed without a Facemask Pose Risk for Bacterial Meningitis

Available for download [Clinical Reminder](#) [PDF - 543 KB]

On this Page

- Summary
- Background
- Recommendations
- Additional Information
- References

Summary

The Centers for Disease Control and Prevention (CDC) is concerned about the occurrence of bacterial meningitis among patients undergoing spinal injection procedures that require injection of material or insertion of a catheter into epidural or subdural spaces (e.g., myelogram, administration of spinal or epidural anesthesia, or intrathecal chemotherapy). Outbreaks of bacterial meningitis following these spinal injection procedures continue to be identified among patients whose procedures were performed by a healthcare provider who did not wear a facemask (e.g., may be labeled as surgical, medical procedure, or isolation mask),^[1] with the most recent occurrence in October 2010 (CDC unpublished data). This notice serves as a reminder that facemasks should always be worn by healthcare providers when performing these spinal injection procedures.^[2]

Background

CDC has investigated multiple outbreaks of bacterial meningitis among patients undergoing spinal injection procedures. Recent outbreaks have occurred among patients in acute care hospitals who received spinal anesthesia or epidural anesthesia, and also among patients at an outpatient imaging facility who underwent myelography.

In each of these outbreak investigations, nearly all spinal injection procedures that resulted in infection were performed by a common healthcare provider who did not wear a facemask. The

www.cdc.gov/injectionsafety/SpinalInjection-Meningitis.html

CDC CLINICAL REMINDER



Spinal Injection Procedures Performed without a Facemask Pose Risk for Bacterial Meningitis

Summary:

The Centers for Disease Control and Prevention (CDC) is concerned about the occurrence of bacterial meningitis among patients undergoing spinal injection procedures that require injection of material or insertion of a catheter into epidural or subdural spaces (e.g., myelogram, administration of spinal or epidural anesthesia, or intrathecal chemotherapy). Outbreaks of bacterial meningitis following these spinal injection procedures continue to be identified among patients whose procedures were performed by a healthcare provider who did not wear a facemask (e.g., may be labeled as surgical, medical procedure, or isolation mask),¹ with the most recent occurrence in October 2010 (CDC unpublished data). This notice serves as a reminder that facemasks should always be worn by healthcare providers when performing these spinal injection procedures.²

Background:

CDC has investigated multiple outbreaks of bacterial meningitis among patients undergoing spinal injection procedures. Recent outbreaks have occurred among patients in acute care hospitals who received spinal anesthesia or epidural anesthesia, and also among patients at an outpatient imaging facility who underwent myelography.

In each of these outbreak investigations, nearly all spinal injection procedures that resulted in infection were performed by a common healthcare provider who did not wear a facemask. The strain of bacteria isolated from the cerebrospinal fluid of these patients was identical to the strain recovered from the oral flora of the healthcare provider who performed the spinal injection procedure. These findings illustrate the risk of bacterial meningitis associated with droplet transmission of the oral flora from healthcare providers to patients during spinal injection procedures.

Since facemasks have been shown to limit spread of droplets arising from the oral flora,² the CDC has recommended their use by healthcare providers when performing spinal injection procedures.²

In addition to wearing a facemask, healthcare providers should ensure adherence to all CDC recommended safe injection practices including using a single-dose vial of medication for only one patient.²

Recommendations:

Anyone performing a spinal injection procedure should review the following CDC recommendations to ensure that they are not placing their patients at risk for infections such as bacterial meningitis.

- Facemasks should always be used when injecting material or inserting a catheter into the epidural or subdural space.²
- Aseptic technique and other safe injection practices (e.g., using a single-dose vial of medication or contrast solution for only one patient) should always be followed for all spinal injection procedures.²

These recommendations apply not only in acute care settings such as hospitals, but in any setting where spinal injection procedures are performed, such as outpatient imaging facilities, ambulatory surgery centers, and pain management clinics.

Additional information is available at:

http://www.cdc.gov/hicpac/2007IP/2007ip_part3.html

References:

1. Centers for Disease Control and Prevention. Bacterial meningitis after intrapartum spinal anesthesia - New York and Ohio, 2008-2009. *MMWR Morb Mortal Wkly Rep.* 2010;59(3):65-9.
2. Centers for Disease Control and Prevention. 2007 Guideline for isolation precautions: preventing transmission of infectious agents in healthcare settings. Available at: <http://www.cdc.gov/hicpac/pdf/isolation/Isolation2007.pdf>. Accessed January 25, 2011.
3. Philips BJ, Fergusson S, Armstrong P, Anderson FM, Wildsmith JA. Surgical face masks are effective in reducing bacterial contamination caused by dispersal from the upper airway. *Br J Anaesth.* 1992;69(4):407-8.

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CMS Other Survey Memos



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Medication and Safe Opioid Use

- CMS issues 32 page memo on medication administration and safe opioid use March 14, 2014 and effective June 6, 2014
 - Risk and patient safety need to review this besides nursing, pharmacy, MEC, and nurse educator
- Concerned about the number of patients with adverse events when taking opioids
- Must have a P&P
- Must train staff and include information that must be in the assessment
- Must document process
 - Questions to hospitalscg@cms.hhs.gov

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CMS Memo Med & Safe Opioid Use

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 14-15-Hospital

DATE: March 14, 2014

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Requirements for Hospital Medication Administration, Particularly Intravenous (IV) Medications and Post-Operative Care of Patients Receiving IV Opioids

Memorandum Summary

- **Medication Administration:** We are updating our guidance for the hospital medication administration requirements to:
 - Make clear that the medication administration requirements under the nursing services condition of participation (CoP) are related to only some components of the overall hospital medication process, but that hospitals are expected, through this and the related requirements under the pharmaceutical services and quality assessment/performance improvement CoPs, to take a comprehensive approach to the medication process.
 - Update our guidance for IV medications and blood transfusions in general; and
 - Reflect the need for patient risk assessment and appropriate monitoring during and after medication administration, particularly for post-operative patients receiving IV opioid medications, in order to prevent adverse events.
- **Immediate Post-operative Care:** Clarification is also being made to the guidance for the surgical services CoP requirement for hospitals to have adequate provisions for immediate post-operative care, to emphasize the need for post-operative monitoring of patients.

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CMS Memo May 30, 2014

- CMS publishes 4 page memo on infection control breaches and when they warrant referral to the public health authorities
- This includes a finding by the state agency (SA), like the Department of Health, or an accreditation organization
 - TJC, DNV Healthcare, CIHQ, or AOA HFAP
- CMS has a list and any breaches should be referred
- Referral is to the state authority such as the state epidemiologist or State HAI Prevention Coordinator

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Infection Control Breaches

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 14-36-All

DATE: May 30, 2014

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Infection Control Breaches Which Warrant Referral to Public Health Authorities

Memorandum Summary

- **Infection Control Breaches Warranting Referral to Public Health Authorities:** If State Survey Agencies (SAs) or Accrediting Organizations (AOs) identify any of the breaches of generally accepted infection control standards listed in this memorandum, they should refer them to appropriate State authorities for public health assessment and management.
- **Identification of Public Health Contact:** SAs should consult with their State's Healthcare Associated Infections (HAI) Prevention Coordinator or State Epidemiologist on the preferred referral process. Since AOs operate in multiple States, they do not have to confer with State public health officials to set up referral processes, but are expected to refer identified breaches to the appropriate State public health contact identified at:
<http://www.cdc.gov/HAI/state-based/index.html>

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CMS Memo Infection Control Breaches

- Using the same needle for more than one individual
- Using the same (pre-filled/manufactured/insulin or any other) syringe, pen or injection device for more than one individual
- Re-using a needle or syringe which has already been used to administer medication to an individual to subsequently enter a medication container (e.g., vial, bag), and then using contents from that medication container for another individual
- Using the same lancing/fingerstick device for more than one individual, even if the lancet is changed

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Access to Hospital Complaint Data

- CMS issued Survey and Certification memo on March 22, 2013 regarding access to hospital complaint data
- Includes acute care and CAH hospitals
 - Does not include the plan of correction but can request
 - Questions to bettercare@cms.hhs.com
- This is the CMS 2567 deficiency data and lists the tag numbers
- Updating quarterly
 - Available under downloads on the hospital website at www.cms.gov

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Updated Deficiency Data Reports

CMS.gov

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Hospitals

This page provides basic information about being certified as a Medicare and/or Medicaid hospital provider and includes links to applicable laws, regulations, and compliance information.

A hospital is an institution primarily engaged in providing, by or under the supervision of physicians, inpatient diagnostic and therapeutic services or rehabilitation services. Critical access hospitals are certified under separate standards. Psychiatric hospitals are subject to additional regulations beyond basic hospital conditions of participation. The State Survey Agency evaluates and certifies each participating hospital as a whole for compliance with the Medicare requirements and certifies it as a single provider institution.

Under the Medicare provider-based rules it is possible for 'one' hospital to have multiple inpatient campuses and outpatient locations. It is not permissible to certify only part of a participating hospital. Psychiatric hospitals that participate in Medicare as a Distinct Part Psychiatric hospital are not required to participate in their entirety.

However, the following are not considered parts of the hospital and are not to be included in the evaluation of the hospital's compliance:

- Components appropriately certified as other kinds of providers or suppliers, i.e., a distinct part Skilled Nursing Facility and/or distinct part Nursing Facility, Home Health Agency, Rural Health Clinic, or Hospice; Excluded residential, custodial, and non-service units not meeting certain definitions in the Social Security Act; and,
- Physician offices located in space owned by the hospital but not functioning as hospital outpatient services departments

Accredited Hospitals - A hospital accredited by a CMS-approved accreditation program may substitute accreditation under that program for survey by the State Survey Agency. Surveyors assess the hospital's compliance with the Medicare Conditions of Participation (CoP) for all services, areas and locations covered by the hospital's provider agreement under its CMS Certification Number (CCN).

Although the survey generally occurs during daytime working hours (Monday through Friday), surveyors may conduct

www.cms.gov/Medicare/Provider-Enrollment-and-Certification/CertificationandCompliance/Hospitals.html

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Can Count the Deficiencies by Tag Number

	A	B	C	D	E	F	G	H	I	J
240	DOCTORS' HOSPITAL OF MICHIGAN	23C461 MI	48341	Short Term	A	0364	AUTOPSIES			7/18/2012 Based on record review and interview, the facility failed to ensure that
241	MARTHA JEFFERSON HOSPITAL	49C500 VA	22911	Short Term	A	0364	AUTOPSIES			9/8/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
242	SAINT LOUISE REGIONAL HOSPITAL	05C940 CA	95020	Short Term	A	0364	AUTOPSIES			1/18/2012 Based on interview and record review, the hospital failed to have a syste
243	EDGERTON HOSPITAL AND HEALTH SERVICES	52I111 WI	53534	Critical Access F-C		0201	AVAILABILITY			10/2/2012 Based on review of MR, review of staffing guidelines, review of P&P, and
244	HOLZER MEDICAL CENTER JACKSON	36I500 OH	45640	Critical Access F-C		0205	BLOOD AND BLOOD PRODUCTS			1/20/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
245	BRANDON REGIONAL HOSPITAL	10C119 FL	33511	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			4/8/2011 Based on clinical record review, staff interview and review of policy and
246	CHRISTUS ST PATRICK HOSPITAL	19C524 LA	70601	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			3/9/2012 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
247	COLUMBUS REGIONAL HEALTHCARE SYSTEM	34C500 NC	28472	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			4/13/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
248	DANA-FARBER CANCER INSTITUTE	22C450 MA	02115	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			9/7/2011 Based on review of documentation and confirmed by staff interviews, ty
249	GOOD SAMARITAN MEDICAL CENTER	10C130 FL	33401	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			2/12/2013 Based on clinical record review and staff interview the facility failed to e
250	LONG BEACH MEDICAL CENTER	33C455 NY	11561	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			12/22/2011 Based on record review, the facility failed to ensure that the patient's b
251	MANATEE MEMORIAL HOSPITAL	10C206 FL	34208	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			4/16/2012 Based on record review, policy review and staff interview it was determi
252	MISSOURI BAPTIST MEDICAL CENTER	26C301 MO	63131	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			4/11/2012 Based on observation, interview, and record review, the facility failed to
253	NORTHWEST MEDICAL CENTER	10C280 FL	33063	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			8/2/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
254	RESTON HOSPITAL CENTER	49C185 VA	20190	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			11/2/2012 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
255	SAINT AGNES HOSPITAL	21C900 MD	21229	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			2/22/2012 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
256	SAINT CATHERINE REGIONAL HOSPITAL	15C220 IN	47111	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			12/13/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
257	SOUTHEASTERN REGIONAL MEDICAL CENTER	34C300 NC	28359	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			12/14/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
258	STANFORD HOSPITAL	05C300 CA	94305	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			3/15/2012 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
259	WAKEMED, CARY HOSPITAL	34C190 NC	27518	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			3/14/2013 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
260	WILKES-BARRE GENERAL HOSPITAL	39C575 PA	18764	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			1/14/2013 Based on review of facility policy, facility documents, medical records (N
261	WILSON MEDICAL CENTER	34C170 NC	27899	Short Term	A	0409	BLOOD TRANSFUSIONS AND IV MEDICATIONS			2/10/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
262	RIVERSIDE GENERAL HOSPITAL	45C320 TX	77004	Short Term	A	0063	CARE OF PATIENTS			11/9/2012 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
263	CIVISTA MEDICAL CENTER	21C5 GA MD	20646	Short Term	A	0067	CARE OF PATIENTS - MD/DO ON CALL			8/4/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
264	MILFORD HOSPITAL, INC	07C300 CT	06460	Short Term	A	0067	CARE OF PATIENTS - MD/DO ON CALL			9/22/2011 Based on review of hospital documentation and interviews with facility
265	PLAZA MEDICAL CENTER OF FORT WORTH	45C900 TX	76104	Short Term	A	0067	CARE OF PATIENTS - MD/DO ON CALL			7/1/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
266	CLARA MAASS MEDICAL CENTER	31C00 NJ	07109	Short Term	A	0068	CARE OF PATIENTS - RESPONSIBILITY FOR CARI			6/2/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
267	GESINGER - COMMUNITY MEDICAL CENTER	28C182 PA	18510	Short Term	A	0068	CARE OF PATIENTS - RESPONSIBILITY FOR CARI			6/14/2011 **NOTE- TERMS IN BRACKETS HAVE BEEN EDITED TO PROTECT CONFIDEN
268	SENTARA NORTHERN VIRGINIA MEDICAL CEN	49C230 VA	22191	Short Term	A	0068	CARE OF PATIENTS - RESPONSIBILITY FOR CARI			12/6/2012 Based on a complaint investigation, document review and interview, the

Sheet1

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Surgery and PACU Deficiencies

Tag	Section	July 14, 2017
940	Surgical Services	109
941	Organization of Surgical Services	19
942	OR Supervision	6
943/944	OR scrub and circulating nurse	9
945	Surgery Privileges	16
951	OR Policies and Procedures	186
952	H&P	34

Surgery and PACU Deficiencies

Tag	Section	July 14, 2017
458	H&P in Medical Records section	28
955	Informed Consent	51
466	Informed Consent in MR Chapter	65
956	Required OR Equipment	5
957	PACU	15
958	OR Register	17
959	OP Report	40
		Total 611

Anesthesia Deficiencies

Section	Tag Number	July 14, 2017
Anesthesia Services	1000	22
Organization of Anesthesia	1001	4
Delivery Anesthesia Services	1002	17
Pre-Anesthesia Evaluation	1003	15
Intra-Operative Record	1004	13
Post Anesthesia Evaluation	1005	35
		Total 109

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CMS Hospital CoPs Section on Surgery, PACU, and Anesthesia



Surgery



Surgical Services 940

- Standard: If provide surgical services, which is optional, service must be well organized
- If outpatient surgery, must be consistent in quality with inpatient care
- Must follow acceptable standards of practice, AMA, ACOS, APIC, AORN, ASA, or ASPAN
- Must be integrated into hospital wide QAPI
- Will inspect all OR rooms
- Access to OR and PACU must be limited to authorized personnel

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AORN Position Statements

Position Statements

AORN position statements articulate the Association's official position or belief about certain perioperative nursing-related topics.

- Allied Health Care Providers and Support Personnel in the Perioperative Practice Setting
- APRN in the Perioperative Environment
- Care of the Older Adult in Perioperative Settings
- Creating a Practice Environment of Safety
- Criminalization of Human Errors in the Perioperative Setting
- Distractions and Noise in the Perioperative Practice Setting
- Entry into Practice
- Environmental Responsibility
- Healthy Perioperative Work Environment
- One Perioperative Registered Nurse Circulator Dedicated to Every Patient Undergoing A Surgical or Other Invasive Procedure
- Orientation of the Registered Nurse and Certified Surgical Technologist to the Perioperative Setting
- Patient Safety
- Perioperative Care of Patients with Do-Not-Resuscitate (DNR) Orders
- Preventing Wrong-Patient, Wrong-Site, Wrong-Procedure Events
- Responsibility for Mentoring RN First Assistants
- Role of the Health Care Industry Representative in the Perioperative Setting
- Safe Staffing and On-Call Practices
- Value of Clinical Learning Activities in the Perioperative Setting in Undergraduate Nursing Curricula

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- ANA Care Coordination and Registered Nurses' Essential Role
- Consensus Model for APRN Regulation
- Consensus Model FAQs
- Immediate Use Steam Sterilization
- ACS Statement on use of cell phones in the operating room

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Surgical Services 940

- Conform to aseptic and sterile technique
- Appropriate cleaning between cases
- Room is suitable for kind of surgery performed
- And it is monitored, inspected and maintained by biomed program
- Equipment available for rapid and routine sterilization which is called immediate use steam sterilization or IUSS
- Temperature and humidity controlled
- ACS and AORN have P&P on many of these

Now Called Immediate Use Steam Sterilization



Immediate-Use Steam Sterilization

"Flash sterilization" has traditionally been used to describe steam sterilization cycles where unwrapped medical instruments are subjected to an abbreviated steam exposure time and then used promptly after cycle completion without being stored. This is in contrast to traditional "terminal sterilization" cycles, where instruments are sterilized within containers, wrappers, or primary packaging designed to maintain the instruments' sterility and allow the devices to be stored for later use. The term "flash" arose out of the abbreviated time of exposure of the unwrapped device.

Today, however, "flash sterilization" is an antiquated term that does not fully describe the various steam sterilization cycles now used to process items not intended to be stored for later use. Current guidelines may require longer exposure times and/or the use of single wrappers or containers designed to allow for aseptic transfer of an item to the point of use. The term "immediate-use steam sterilization" more accurately reflects the current use of these processes. The same critical reprocessing steps (such as cleaning, decontaminating, and transporting sterilized items) must be followed regardless of the specific sterilization cycle employed; a safe process does not include short-cuts or work-arounds.

"Immediate use" is broadly defined as the shortest possible time between a sterilized item's removal from the sterilizer and its aseptic transfer to the sterile field. Immediacy implies that a sterilized item is used during the procedure for which it was sterilized and in a manner that minimizes its exposure to air and other environmental contaminants. A sterilized item intended for immediate use is not stored for future use, nor held from one case to another. Immediacy, rather than being defined according to a specific time frame, is established through the critical analysis and expert collaboration of the health care team.

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Immediate Use Steam Sterilization IUSS

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality /Survey & Certification Group

Ref: S&C: 14-44-Hospital/CAH/ASC

DATE: August 29, 2014

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Change in Terminology and Update of Survey and Certification (S&C)
Memorandum 09-55 Regarding Immediate Use Steam Sterilization (IUSS) in
Surgical Settings

Memorandum Summary

- **Change in Terminology: "Flash" Sterilization vs. IUSS:** Nationally recognized organizations with expertise in infection prevention and control and instrument sterilization processes, and other professional organizations recommend abandoning the use of the term "flash" sterilization, which is now considered outmoded, and replacing it with the term "IUSS."
- **Update of S&C Memorandum 09-55 Regarding Standards for Immediate Use Sterilization in Surgical Settings:** This memo reiterates and updates information regarding nationally recognized infection prevention and control guidelines and professionally acceptable standards of practice with respect to immediate use sterilization and supersedes S&C Memorandum 09-55.

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CMS Memo April 19, 2013

- CMS issues memo related to the relative humidity (RH)
- AORN use to say temperature maintained between 68-73 degrees and humidity between 30-60% in OR, PACU, cath lab, endoscopy rooms and instrument processing areas
- CMS says if no state law can write policy or procedure or process to implement the waiver
- Waiver allows RH between 20-60%
- In anesthetizing locations- see definition in memo

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Humidity in Anesthetizing Areas

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality/Survey & Certification Group

Ref: S&C: 13-25-LSC & ASC

DATE: April 19, 2013

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Relative Humidity (RH): Waiver of Life Safety Code (LSC) Anesthetizing Location Requirements; Discussion of Ambulatory Surgical Center (ASC) Operating Room Requirements

Memorandum Summary

- ***RH of ≥20 Percent Permitted in Anesthetizing Locations:*** The Centers for Medicare & Medicaid Services (CMS) is issuing a categorical LSC waiver permitting new and existing ventilation systems supplying hospital and critical access hospital (CAH) anesthetizing locations to operate with a RH of ≥20 percent, instead of ≥35 percent. We are also recommending that RH not exceed 60 percent in these locations.
- ***This Waiver Does Not Apply:***
 - When more stringent RH control levels are required by State or local laws and regulations; or
 - Where reduction in RH would negatively affect ventilation system performance.
- ***Hospitals & CAHs Must Elect to Use the Categorical Waiver:***
 - Individual waiver applications are not required, but facilities are expected to have written documentation that they have elected to use the waiver.
 - At the entrance conference for any survey assessing LSC compliance, a facility that has elected to use this waiver must notify the survey team.
- ***Ongoing Requirements:***
 - Facilities must monitor RH in anesthetizing locations and take corrective actions when needed to ensure RH remains at or above 20 percent.
- ***ASCs:*** ASCs are not subject to all of the same LSC requirements as hospitals, but are required, consistent with 42 CFR 416.44(a)(1), to maintain RH in operating rooms in accordance with nationally accepted guidelines.
- ***State Operations Manual (SOM) Appendices A, L, E & W are being updated accordingly.***

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Impact of Lowering the Humidity

- Lowering humidity can impact some equipment and supplies
- Can affect shelf life and product integrity of some sterile supplies including EKG electrodes
- Some electro-medical equipment may be affected by electrostatic discharge especially older equipment
 - Can cause erratic behavior of software and premature failure of the equipment
 - It can affect calibration of the equipment
- Follow the manufacturers instructions for use that explains any RH requirements

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CMS Memo on Low Relative Humidity

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop C2-21-16
Baltimore, Maryland 21244-1850



Center for Clinical Standards and Quality / Survey & Certification Group

Ref: S&C: 15-27-Hospital, CAH & ASC

DATE: February 20, 2015

TO: State Survey Agency Directors

FROM: Director
Survey and Certification Group

SUBJECT: Potential Adverse Impact of Lower Relative Humidity (RH) in Operating Rooms (ORs)

Memorandum Summary

- **Information on OR RH** is provided for Ambulatory Surgical Centers (ASCs) & Supplemental Information for Hospitals & Critical Access Hospitals (CAHs) Using the Categorical Waiver of Life Safety Code (LSC) Anesthetizing Location RH Requirements
 - The Association for the Advancement of Medical Instrumentation (AAMI) coordinated the release on January 5, 2015 of a Joint Communication of multiple healthcare-related organizations on how a RH of <30% in ORs may affect the performance of some sterile supplies and electro-medical equipment.
- **S&C 13-25-LSC & ASC** permits hospitals and CAHs to use a LSC categorical waiver to establish an RH level <35% in anesthetizing locations. Before electing or continuing to use this categorical waiver, hospitals and CAHs are expected to ensure that the humidity levels in their ORs are compatible with the manufacturers' instructions for use (IFUs) for the supplies and equipment used in that setting.
- **ASCs do not require a categorical waiver** in order to use a lower RH level in their ORs but also need to ensure they comply with the IFUs for their OR supplies and equipment.

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Impact of Lowering the Humidity



American Hospital
Association®



Quality Advisory

January 21, 2015

01-21-2015 Accessed : https://www.magnetmail.net/actions/email_web_version.cfm?recipient_id=1331564405&message_id=8663272&user_id=AHA_8&group_id=1105177&jobid=25267573

NEW GUIDANCE ON HUMIDITY LEVELS IN THE OPERATING ROOM

THE ISSUE

A change in the standards regulating a hospital's physical environment in the operating room (OR) may conflict with the instructions for use on some equipment and supplies routinely used in surgery. To ensure patient safety during surgery, the AHA in collaboration with its personal membership groups, the American Society for Healthcare Engineering (ASHE) and the Association for Healthcare Resource & Materials Management (AHRMM), urge hospitals to examine their humidity levels in the OR and consider the effects on equipment and products used during surgery. This advisory and associated attachments will assist in your assessment.

BACKGROUND

Many safety codes and standards regulating the health care physical environment now require relative humidity levels in ORs (not other areas of the facility) to be at least 20 percent, a change from the 30 percent minimum humidity required by some previous editions of codes. The 20 percent threshold provides hospitals with flexibility during

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Lowering Humidity Can Have Other Effects

RELATIVE HUMIDITY LEVELS IN THE OPERATING ROOM JOINT COMMUNICATION TO HEALTHCARE DELIVERY ORGANIZATIONS January 2015



American Hospital
Association®



American Society of
Anesthesiologists®



This is an important communication to the multiple stakeholders in healthcare whose work touches sterile supplies and electro-medical equipment used in delivering care to patients. The subject is about how relative humidity (RH) levels lower than 30% can impact the integrity and functionality of some of these products, with a special emphasis on RH levels in the operating room (OR). The following professional organizations have collaborated in the development of this communication: Ambulatory Surgery Center Association (ASCA), American College of Clinical Engineering (ACCE), American Hospital Association (AHA), American Society for Healthcare Engineering (ASHE), American Society of Anesthesiologists (ASA), American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE), Association for Healthcare Resource & Materials Management (AHRMM), Association for the Advancement of Medical Instrumentation (AAMI), Association of periOperative Registered Nurses (AORN), Association of Surgical Technologists (AST), Health Industry Distributors Association (HIDA), and the International Association of Healthcare Central Service Materials Management (IAHCSMM).¹

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Organization and Staffing 941

- Standard: The organization of surgical services must be appropriate to the scope of services offered
- Must have the appropriate equipment
- Must have the appropriate types and numbers of qualified personnel to furnish surgical services
 - Department director, scrub nurse, circulator, etc.
- The surveyor is to review the organizational chart to indicate lines of authority and delegation

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Safe Staffing in the OR



AORN Position Statement on Perioperative Safe Staffing and On-Call Practices

POSITION STATEMENT

Staffing for the perioperative setting is dynamic in nature and depends on clinical judgment, critical thinking, and the administrative skills of the perioperative registered nurse (RN) administrator. Patients undergoing operative and other invasive procedures require perioperative nursing care provided by a perioperative RN, regardless of the setting. This position statement articulates AORN's position regarding safe staffing and on-call practices for perioperative RNs based on the available research. It is intended to serve as a guide for perioperative RN administrators; however, it is the responsibility of each facility to determine specific policies and procedures based on patient need and available resources to ensure safe staffing and on-call practices. The purpose of this position statement is to provide a framework for developing a staffing plan throughout the continuum of perioperative patient care, beginning with scheduling an operative or other invasive procedure through the postoperative phase, and provide staffing strategies to accommodate safe perioperative patient care while promoting a safe work environment. It includes an addendum with suggested staffing formulas to meet safe staffing and on-call practices.

Perioperative RN administrators should identify workforce requirements with a focus on the effect of environmental factors, the setting in which the procedure will be performed, and the unique needs of the patient. AORN believes that patient and workforce safety must be the foundation for all staffing plans. To this end AORN supports the following:

- Perioperative clinical staffing guidelines should be based on individual patient needs, patient acuity, technological demands, staff member competency, skill mix, practice standards, health care regulations, accreditation requirements, and state staffing laws.¹⁻³ Staffing requirements are relative to department functions and assigned role expectations.
- An effective staffing plan should be flexible and responsive to short-term and long-term patient and organizational demands. Effective planning involves determining staffing needs,

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Surgery OR Director 942-944

- Standard: OR must be supervised by experienced RN or doctor (MD/DO)
- Must have specialized training in surgery and management of surgical service operation
- Will review job description
- LPN's and OR techs can serve as scrub nurses under supervision of RN
- Qualified RN may perform circulating duties in OR
- LPN or surgery tech may assist in circulating duties if allowed by state law & under supervision of RN who is immediately available

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Surgery 942-944

- Circulating RN must be in the operating suite and available to immediately and physically respond in emergencies
- Can not be outside the department or engaged in other activities to prevent immediate intervention
- Hospital must have P&P on this

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RN Circulator for Every Patient



AORN Position Statement on One Perioperative Registered Nurse Circulator Dedicated to Every Patient Undergoing an Operative or Other Invasive Procedure

POSITION STATEMENT

The goal of perioperative nursing practice is to assist patients to achieve a level of wellness equal to or improved from the preoperative level, and to support the patients' family members and significant others during the perioperative period. AORN is committed to the provision of safe perioperative nursing care by ensuring that every patient undergoing an operative or other invasive procedure is cared for by minimum of one registered nurse (RN) in the circulating role. To this end, AORN believes the following:

- At a minimum, one perioperative RN circulator should be dedicated to each patient undergoing an operative or other invasive procedure and be present during that patient's entire intraoperative experience.¹
- Patient care in the perioperative setting is dynamic in nature and depends on the clinical knowledge, judgment, and clinical-reasoning skills possessed by the perioperative RN.
- The perioperative RN circulator delegates, supervises, and evaluates the activities of other team members while simultaneously executing immediate directives and interventions in urgent or emergent situations.²
- The foundation of perioperative nursing practice is based on both the art and science of nursing, including scientific principles, best practices, and patient advocacy.
- A practice environment that acknowledges the unique education of an RN empowers perioperative nurses to provide the highest quality of patient care in the surgical arena.
- Scientific research and the identification of nursing quality indicators, such as those found in the language of the Perioperative Nursing Data Set (PNDS), are the best means to monitor the relationship between appropriate nurse staffing and patient outcomes in the surgical setting.

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Surgical Privileges 945

- Surgical privileges must be delineated for all practitioners performing surgery, in accordance with competence of each practitioner
- Surgery service must maintain roster specifying the surgical privilege
- Privileges must be reviewed every two years
- Current list of surgeons suspended must also be retained
 - Discussed in the earlier sections

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Surgical Privileges

- MS bylaws must have criteria for determining privileges
- Surgical privileges are granted in accordance with the competence of each
- MS appraisal procedure must evaluate each practitioner's training, education, experience, and demonstrated competence
- As established by the QAPI program, credentialing, adherence to hospital P&P, and laws

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Surgical Privileges 945

- Must specify for each practitioner that performs surgical tasks including MD, DO, dentists, oral surgeon, podiatrists
- RNFA, NP, surgical PA, surgical tech, et. al.
- Must be based on compliance with what they are allowed to do under state law
- If task requires it to be under supervision of MD/DO this means supervising doctor is present in the same room working with the patient

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Surgery Policies 951

- Aseptic and sterile surveillance and practice, including scrub technique
- Identify infected and non-infected cases
- Housekeeping requirements/procedures
- Patient care requirements
 - pre-op work area
 - patient consents and releases
 - safety practices
 - patient identification process and clinical procedures

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Extensive Toolkit on Environmental Cleaning

Membership Clinical Practice Education Events Books & Publications Get Involved

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Environmental Cleaning Tool Kit

Overview

Effective cleaning procedures in the perioperative environment are essential to promote safety and decrease the risk of the spread of infection for surgical patients and team members. Directors, managers, educators, and other interested health care providers from nursing, environmental services, and infection prevention will benefit by using the online modules and the associated materials to teach everyone in the perioperative areas how to clean the perioperative environment based on the current evidence-based recommended practices.

The purpose of the Environmental Cleaning Toolkit is to educate all team members about the recommended practices on cleaning the perioperative environment, promote patient safety and prevent the spread of infection in the perioperative environment.

Learning Objectives:

1. Describe the importance of a clean perioperative environment.
2. Define the common terminology associated with recommended practices for cleaning the perioperative environment.
3. Explain the recommended steps for cleaning the perioperative areas and the sterile processing areas.
4. State the recommended practices for using chemicals, tools, and equipment for cleaning in the perioperative areas.

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Environmental Cleaning: It's Important!

Promote patient safety



*Prevent the
spread of infection*

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Surgery Policies 951

- Duties of scrub and circulating nurses
- Safety practices
- Surgical counts
- Scheduling of patients for surgery
- Personnel policies in OR
- Resuscitative techniques
- DNR status
- Care of surgical specimens

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Policy on Preventing Wrong Site Surgery UP

Verification of Correct Site, Correct Procedure, and Correct Patient for Invasive or Surgical Procedures

Purpose:

To provide steps to assist in minimizing avoidable risks during invasive or surgical procedures. The expected outcome is that the patient's procedure is performed on the correct site, side, and level.

Policy:

It is the policy of [insert name of facility] that the following steps must be completed before every invasive or surgical procedure, unless noted on the exception list. This policy shall be followed for all invasive or surgical procedures throughout the facility.

- In the preprocedure/preoperative area, a confirmation of the correct site, procedure, and patient shall occur.
- In the preprocedure/preoperative area, the patient shall be involved whenever possible. If the patient is unable to participate, a designated caregiver shall participate.
- All patients who undergo an invasive or surgical procedure involving laterality, multiple structures (eg, fingers and toes), or multiple levels (eg, spinal surgery) must have their surgical site marked.
- If a patient refuses site marking, the patient's physician will review the rationale for site marking and the implications for refusing site marking.
- A licensed independent practitioner or other provider who is privileged or permitted to perform the intended invasive or surgical procedure [determined by facility] will mark the procedure/surgical site before the patient enters the procedure/operating room unless the anatomical site is exempt per policy guidelines.
- A discrepancy at any point in time must be resolved before continuing the procedure. All team members and the patient, if possible, must agree on resolution of the identified discrepancy.
- A time out will be performed for all cases, including those not requiring site marking.
- Two patient identifiers [determined by facility] will be used to verify a patient's identity (eg, full name, date of birth). A patient room number should not be used as an identifier.
- If a treatment (eg, anesthesia block) or medication administration (eg, eye drops) must be performed before the site has been marked (in the holding area), the patient verification process as outlined

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COMPREHENSIVE SURGICAL CHECKLIST

Blue = World Health Organization (WHO) Green = The Joint Commission - Universal Protocol (JC) 2010 National Patient Safety Goals Orange = JC and WHO

PREPROCEDURE CHECK-IN	SIGN-IN	TIME-OUT	SIGN-OUT
In Holding Area	Before Induction of Anesthesia	Before Skin Incision	Before the Patient Leaves the Operating Room
Patient/patient representative actively confirms with Registered Nurse (RN):	RN and anesthesia care provider confirm:	Initiated by designated team member	RN confirms:
Identity <input type="checkbox"/> Yes Procedure and procedure site <input type="checkbox"/> Yes Consent(s) <input type="checkbox"/> Yes Site marked <input type="checkbox"/> Yes <input type="checkbox"/> N/A by person performing the procedure RN confirms presence of: History and physical <input type="checkbox"/> Yes Preanesthesia assessment <input type="checkbox"/> Yes Diagnostic and radiologic test results <input type="checkbox"/> Yes <input type="checkbox"/> N/A Blood products <input type="checkbox"/> Yes <input type="checkbox"/> N/A Any special equipment, devices, implants <input type="checkbox"/> Yes <input type="checkbox"/> N/A Include in Preprocedure check-in as per institutional custom: Beta blocker medication given (SCIP) <input type="checkbox"/> Yes <input type="checkbox"/> N/A Venous thromboembolism prophylaxis ordered (SCIP)	Confirmation of: identity, procedure, procedure site and consent(s) <input type="checkbox"/> Yes Site marked <input type="checkbox"/> Yes <input type="checkbox"/> N/A by person performing the procedure Patient allergies <input type="checkbox"/> Yes <input type="checkbox"/> N/A Difficult airway or aspiration risk? <input type="checkbox"/> No <input type="checkbox"/> Yes (preparation confirmed) Risk of blood loss (> 500 ml) <input type="checkbox"/> Yes <input type="checkbox"/> N/A # of units available _____ Anesthesia safety check completed <input type="checkbox"/> Yes Briefing: All members of the team have discussed care plan and addressed concerns <input type="checkbox"/> Yes	Introduction of team members <input type="checkbox"/> Yes All: Confirmation of the following: identity, procedure, incision site, consent(s) <input type="checkbox"/> Yes Site is marked and visible <input type="checkbox"/> Yes <input type="checkbox"/> N/A Relevant images properly labeled and displayed <input type="checkbox"/> Yes <input type="checkbox"/> N/A Any equipment concerns? Anticipated Critical Events Surgeon: States the following: <input type="checkbox"/> critical or nonroutine steps <input type="checkbox"/> case duration <input type="checkbox"/> anticipated blood loss Anesthesia Provider: <input type="checkbox"/> Antibiotic prophylaxis within one hour before incision <input type="checkbox"/> Yes <input type="checkbox"/> N/A <input type="checkbox"/> Additional concerns? Scrub and circulating nurse: <input type="checkbox"/> Sterilization indicators have been confirmed <input type="checkbox"/> Additional concerns?	Name of operative procedure Completion of sponge, sharp, and instrument counts <input type="checkbox"/> Yes <input type="checkbox"/> N/A Specimens identified and labeled <input type="checkbox"/> Yes <input type="checkbox"/> N/A Any equipment problems to be addressed? <input type="checkbox"/> Yes <input type="checkbox"/> N/A To all team members: What are the key concerns for recovery and management of this patient? _____ _____ _____ _____ _____ _____ April 2010

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Surgery Policies 951

- Malignant hyperthermia
- Protocols for all surgical procedures
- Sterilization and disinfection procedures
- Handling infectious and biomedical waste
- Outpatient surgery post op planning
- Acceptable OR attire
 - AORN has guidelines on this and says all scrubs must be laundered by the hospital
 - Recommended Practices for Surgical Attire

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Preventing OR Fires 951

- Read detailed section on use of alcohol based skin prep and how to prevent an OR fire
- AORN has toolkit on preventing OR fires and detailed policy on flammable prep in the OR and how to prevent fires
- Special precautions developed by NFPA and incorporated into NPSG by TJC
- ASA has good document on preventing fires in the OR
- Pa Patient Safety Authority has great recommendations

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Fire Safety Video

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PREVENTION AND MANAGEMENT OF OPERATING ROOM FIRES

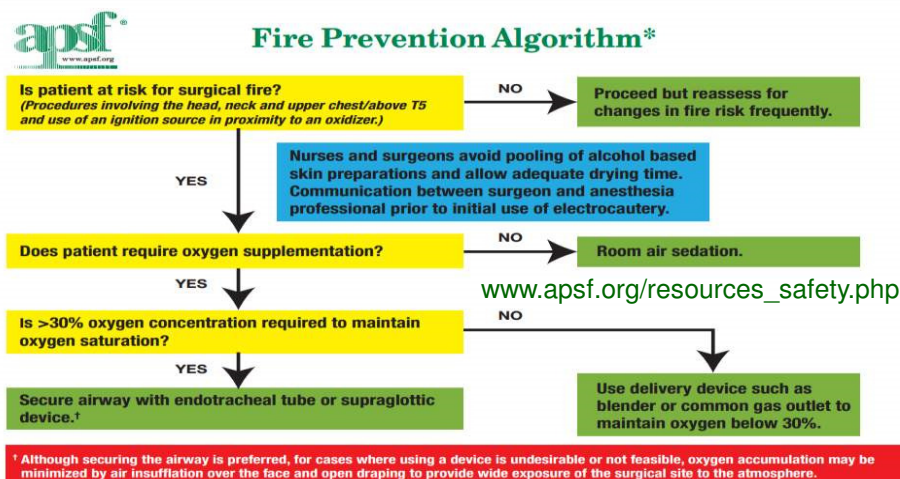
With the assistance of ECRI Institute, APSF has produced an 18-minute long video, Prevention and Management of Operating Room Fires, which was released in February 2010. The intended audience is everyone who works in the OR during surgery.

Watch the video on your computer now without storing it on your hard drive (streaming download)

[Request a complimentary DVD copy of the video](#)

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APSF Fire Prevention Algorithm Mar 2013



*The following organizations have indicated their support for APSF's efforts to increase awareness of the potential for surgical fires in at-risk patients: American Society of Anesthesiologists, American Association of Nurse Anesthetists, American Academy of Anesthesiologist Assistants, American College of Surgeons, American Society of Anesthesia Technologists and Technicians, American Society of PeriAnesthesia Nurses, Association of periOperative Registered Nurses, ECRI Institute, Food and Drug

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FDA Surgical Fire Prevention

FDA U.S. Food and Drug Administration A-Z Index Search

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Drug Safety and Availability

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- Medication Errors
- FDA Drug Safety Newsletter
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- Safe Use Initiative
- Drug Recalls
- Drug Integrity and Supply Chain Security

Safe Use Initiative: FDA-Sponsored Stakeholder Meeting on Surgical Fire Prevention

www.fda.gov/Drugs/DrugSafety/ucm239511.htm

On October 22, 2010, the Food and Drug Administration held a workshop to discuss FDA regulated products implicated in surgical fires and challenges in eliminating fires. The workshop was organized by the Center for Drug Evaluation and Research's Safe Use Initiative team and the Center for Devices and Radiological Health Division of Patient Safety Partnerships.

Background

Surgical fires are rare events but can result in serious morbidity and death. Based on the best available data from ECRI Institute, a not-for-profit organization with a 30-year history of investigating operating room fires, approximately 550 to 650 occur in the United States each year¹. Surgical fires occur during handling of one or more of the elements of the fire triad—the ignition source (e.g. electrocautery devices and lasers), the fuel source (drapes, alcohol based, surgical skin preparation products), and the oxidizer (e.g. oxygen, room air)—all components present in the surgical suite. Surgical fires are “never events”—so called because they are serious events that should never occur. They are 100% preventable.² In 2003, the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) issued a sentinel event alert bulletin to ambulatory surgical sites and some hospitals. The bulletin was related to fires that occur during operative and invasive procedures and served to raise the level of awareness of the dangers of surgical fires. The Joint Commission recommended that health care organizations prevent surgical fires by providing education and training for nonoperative practitioners. The

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Drug Safety and Availability

Safe Use Initiative

Preventing Surgical Fires

How Surgical Fires Start

About the Preventing Surgical Fires Initiative

Recommendations for Healthcare Professionals on Preventing Surgical Fires

Information for Patients on Surgical Fires

Initiative Partners

Resources and Tools for Preventing Surgical Fires

Reporting Surgical Fires to FDA

Preventing Surgical Fires

Collaborating to Reduce Preventable Harm

Surgical fires are fires that occur in, on or around a patient who is undergoing a medical or surgical procedure. An estimated 550 to 650 surgical fires occur in the United States per year, some causing serious injury, disfigurement, and even death.¹ Despite the fact that the root causes of surgical fires are well-understood, surgical fires still occur. Many healthcare organizations have developed tools, implemented strategies, and conducted education and outreach efforts to reduce the risk of fires. To supplement these efforts, FDA and its partners are launching the “Preventing Surgical Fires” initiative to:

- increase awareness of factors that contribute to surgical fires
- disseminate surgical fire prevention tools
- promote the adoption of risk reduction practices throughout the healthcare community

Spotlight

- Get e-mail updates on Preventing Surgical Fires

Contact Us

Safe Use Initiative

301-796-7600

cdersafeuseinitia@fda.hhs.gov

Office of the Center Director

WO 51-1341

10903 New Hampshire Avenue

Silver Spring, MD 20993

www.fda.gov/Drugs/DrugSafety/SafeUseInitiative/PreventingSurgicalFires/default.htm

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FDA Resources FDA Video Toolkit



www.fda.gov/Drugs/DrugSafety/SafeUseInitiative/PreventingSurgicalFires/ucm272680.htm

TJC has taken over the website

- **Prevention of Surgical Fires**
Continuing Medical Education (CME) credits are available to physicians for this video. Please see the Medscape.org site for CME details. (Registration required.)
- **Prevention and Management of Operating Room Fires**
With the assistance of ECRI Institute, The Anesthesia Patient Safety Foundation (APSF) has produced this 18-minute long video describes best practices to prevent the potentially devastating complication of a fire in the operating room. The intended audience is everyone who works in the OR during surgery. Watch the video online or request a complementary DVD.
- **FDA Patient Safety News: Preventing Fires in the Operating Room**
This 3 minute FDA video clip for health care professionals, summarizes the main points of APSF's video, "Prevention and Management of Operating Room Fires."




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www.cspsteam.org/TJCSurgicalFireCollaborative/preventionsurgicalfires.html


Preventing Surgical Fires

Collaborating to Reduce Preventable Harm

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- disseminate surgical fire prevention tools
- promote the adoption of risk reduction practices throughout the healthcare community

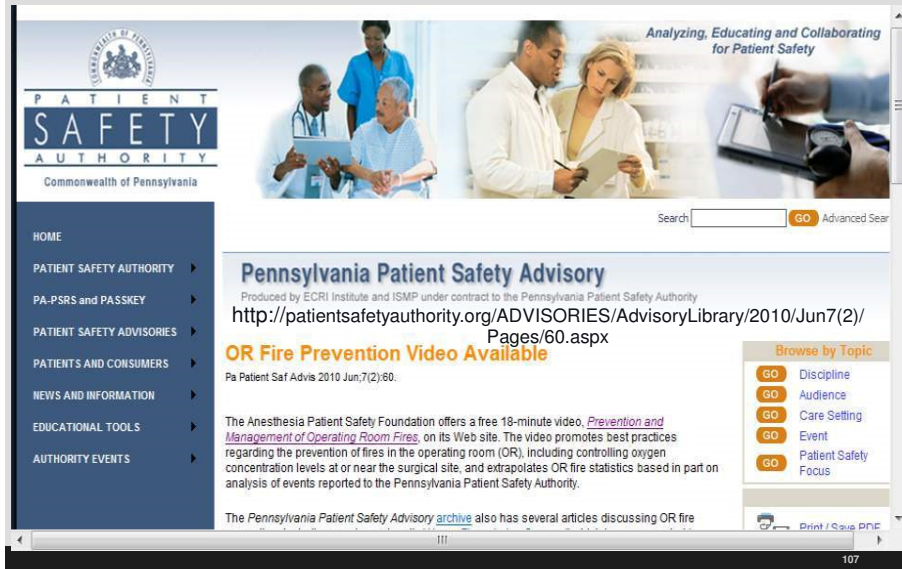
¹ ECRI Institute New Clinical Guide to Surgical Fire Prevention. Health Devices October 2009



Information About Surgical Fires

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Pa Patient Safety Authority



PATIENT SAFETY AUTHORITY
Commonwealth of Pennsylvania

Analyzing, Educating and Collaborating for Patient Safety

Search GO Advanced Search

Pennsylvania Patient Safety Advisory
Produced by ECRI Institute and ISMP under contract to the Pennsylvania Patient Safety Authority
[http://patientsafetyauthority.org/ADVISORIES/AdvisoryLibrary/2010/Jun7\(2\)/Pages/60.aspx](http://patientsafetyauthority.org/ADVISORIES/AdvisoryLibrary/2010/Jun7(2)/Pages/60.aspx)

OR Fire Prevention Video Available
Pa Patient Saf Advis 2010 Jun7(2):60.

The Anesthesia Patient Safety Foundation offers a free 18-minute video, *Prevention and Management of Operating Room Fires*, on its Web site. The video promotes best practices regarding the prevention of fires in the operating room (OR), including controlling oxygen concentration levels at or near the surgical site, and extrapolates OR fire statistics based in part on analysis of events reported to the Pennsylvania Patient Safety Authority.

The Pennsylvania Patient Safety Authority [archive](#) also has several articles discussing OR fire

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ASA Updated February 2013

Practice Advisory for the Prevention and Management of Operating Room Fires

An Updated Report by the American Society of Anesthesiologists Task Force on Operating Room Fires

www.asahq.org/Home/For-Members/Practice-Management/Practice-Parameters/#fires

PRactice Advisories are systematically developed reports that are intended to assist decision-making in areas of patient care. Advisories provide a synthesis and analysis of expert opinion, clinical feasibility data, open-forum commentary, and consensus surveys. Practice Advisories developed by the American Society of Anesthesiologists (ASA) are not intended as standards, guidelines, or absolute requirements, and their use cannot guarantee any specific outcome. They may be adopted, modified, or rejected according to clinical needs and constraints and are not intended to replace local institutional policies.

Practice Advisories are not supported by scientific literature to the same degree as standards or guidelines because of the lack of sufficient numbers of adequately controlled studies. Practice Advisories are subject to periodic update or revision as warranted by the evolution of medical knowledge, technology, and practice.

Updated by the Committee on Standards and Practice Parameters: Jeffrey L. Apfelbaum, M.D. (Chair), Chicago, Illinois, and the Task Force on Operating Room Fires: Robert A. Caplan, M.D. (Task Force Chair), Seattle, Washington; Steven J. Barker, Ph.D., M.D., Tucson, Arizona; Richard T. Connis, Ph.D., Woodinville, Washington; Charles Cowles, M.D., Deer Park, Texas; Jan Ehrenwerth, M.D., Madison, Connecticut; David G. Nickinovich, Ph.D., Bellevue, Washington; Donna Pritchard, R.N., Brooklyn, New York; and David W. Roberson, M.D., Boston, Massachusetts. The original document was developed by the American Society of Anesthesiologists.

- What other guideline statements are available on this topic?
 - This Practice Advisory updates the "Practice Advisory for Prevention and Management of Operating Room Fires," adopted by the American Society of Anesthesiologists in 2007 and published in 2008.*
- Why was this Advisory developed?
 - In October 2011, the Committee on Standards and Practice Parameters elected to collect new evidence to determine whether recommendations in the existing Practice Advisory were supported by current evidence.
- How does this Advisory differ from existing guidelines?
 - New evidence presented includes an updated evaluation of scientific literature. The new findings did not necessitate a change in recommendations.
- Why does this Advisory differ from existing guidelines?
 - The American Society of Anesthesiologists Advisory differs from the existing guidelines because it provides updated evidence obtained from recent scientific literature.

This document updates the "Practice Advisory for Prevention and Management of Operating Room Fires: A Report by the American Society of Anesthesiologists Task Force on Operating Room Fires," adopted by the ASA in 2007 and published in 2008.*

Methodology

* Definition of Operating Room Fires. Web site.

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AORN Fire Risk Assessment Tool

Fire Risk Assessment Tool

Instructions for use

Purpose

To assist the perioperative team in determining and communicating the potential fire risk for each individual patient.

Instructions for use

1. This risk assessment is intended to be used with the Policy and Procedure which contains additional information on fire prevention.
2. The circulating nurse will complete the risk assessment to determine the risk level designation. The risk level designation of A, B, C, D, E is determined by the code assigned to each of the critical questions below that have an affirmative response. The results may be any one letter or any combination of the letters.
3. The circulating nurse will report those having a positive response to the surgical team during the "Time Out" as A, B, C, D, or E or any combinations of the letters.

109

H&P 952

- H&P must be on the chart before the patient goes to surgery
- Must make sure H&P is no older than 30 days
- Must update the day of surgery before surgery except in emergencies
- Must be on chart 24 hours after admission
- P&P must specify what is an emergency
 - See tag 358 on H & P in medical records section

110

Consent 955

- Informed consent is in three sections of the CoPs and each is different and not a repeat
- Third section in the surgery chapter
- Surgical services
- Consent must be in chart before surgery
 - Exception for emergencies
- Tag 466 in medical records section sets out the mandatory elements that must be in a consent form

111

Informed Consent MR Mandatory Elements

- Name of hospital
- Name of procedure or treatment
- Name of responsible practitioner who is performing
- Statement that benefits, material risks and alternatives were explained
- Signature of patient with date and time

112

Informed Consent 955

- Recommend anesthesia consent
- Lists elements for well designed process, which are the optional elements
- Specifies what must be in the consent policy
- Who can obtain
- Which procedures need consent

113

Informed Consent Policy

- When is surgery an emergency
- Content of consent form
- Process to obtain consent
- If consent obtained outside hospital how to get it into medical records

114

Informed Consent 955

- Must disclose if residents, RNFA, Surgical PAs Cardiovascular Techs are doing important tasks
- **Important surgical tasks** include: opening and closing, dissecting tissue, removing tissue, harvesting grafts, transplanting tissue, administering anesthesia, implanting devices and placing invasive lines
- But requirement to have this in writing in under optional list or well designed list

115

Surgery Equipment 956

- Call-in system
- Cardiac monitor
- Defibrillator
- Aspirator (suction equipment)
- Trach set (cricothyroidotomy is not a substitute)
- TJC PC.03.01.01 includes this plus ventilator, and manual breathing bags

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OR Register 958

- Patient's name, id number
- Date of surgery
- Total time of surgery
- Name of surgeons, nursing personnel, anesthesiologist, and assistants
- Type of anesthesia
- Operative findings, pre-op and post-op diagnosis
- Age of patient
- See TJC RC.02.01.03 which are now the same

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OR Register 958

- Patient's name, identification number
- Date of surgery
- Total time of surgery
- Name of surgeons, nursing personnel, anesthesiologist, and assistants
- Type of anesthesia
- Operative findings, pre-op and post-op diagnosis
- Age of patient
- See TJC RC.02.01.03 which are now the same

118

Operative Report 959

- Name and identity of patient
- Date and time of surgery
- Name of surgeons, assistants
- Pre-op and post-op diagnosis
- Name of procedure
- Type of anesthesia

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Operative Report 959

- Complications and description of techniques and tissue removed
- Grafts, tissue, devices implanted
- Name and description of significant surgical tasks done by others
 - See list-opening, closing, harvesting grafts etc.

120

CMS Hospital CoPs Section on PACU



PACU 957

- Standard: Must be adequate provisions for immediate post-op care
- Must be in accordance with acceptable standards of care, for all patients including same day surgery patients
 - Such as following the ASPAN standards of care and practice
- Separate room with limited access
- P&P specify transfer requirements to and from PACU

PACU 957

- PACU assessment includes level of activity, **level of pain**, respiration, BP, LOC, patient color
 - Such as Aldrete, PADSS or post anesthesia discharge scoring system, PAS, modified Aldrete, PARS or post anesthesia recovery scale etc.
- If not sent to PACU then close observation of patient until has gained consciousness by a qualified RN
- Surveyor is instructed to observe care provided in the PACU to make sure they are monitored and assessed prior to transfer or discharge
- Will look to determine if hospital has system to monitor needs of post-op patient transferred from PACU to other areas of the hospital

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Post-Operative Monitoring 2014

- Hospitals are expected to have P&P on the minimum scope and frequency of monitoring in **post-PACU** setting
- Must be consistent with the standard of care
- Concerned about post-op patients receiving opioids
- Concern about risk for over-sedation and respiratory depression
- Once out of PACU not monitored as frequently
- Need appropriate assessment to prevent these complications (See Tag 405)

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ASPAN

ASPAN American Society of PeriAnesthesia Nurses

www.aspan.org

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Serving nurses practicing in all phases of preanesthesia and postanesthesia care, ambulatory surgery, and pain management

ASPAN Highlights

- 2017 Winter/Spring Webcasts & Seminars
- 2017-2018 ASPAN Willingness-to-Participate Form
- 2016 Pediatric Competency Based Orientation
- 2015-2017 Perianesthesia Nursing Standards, Practice Recommendations and Interpretive Statements
- September/October Breathline Online

New! HAIL Perianesthesia Certification Review Bundle. Prepare for your exam and earn contact hours at your convenience.

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PeriAnesthesia Nursing Standards

ASPAN American Society of PeriAnesthesia Nurses

www.aspan.org/Clinical-Practice/ASPAN-Standards

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Serving nurses practicing in all phases of preanesthesia and postanesthesia care, ambulatory surgery, and pain management

2015-2017 PERIANESTHESIA NURSING STANDARDS, PRACTICE RECOMMENDATIONS AND INTERPRETIVE STATEMENTS

Click here to order online.

2015-2017 PeriAnesthesia Nursing Standards, Practice Recommendations and Interpretive Statements

Since its inception in 1984, the American Society of PeriAnesthesia Nurses (ASPAN) *Standards of PeriAnesthesia Nursing Practice* has provided a framework for the expanding scope of care for a diverse patient population across all perianesthesia settings. The *Standards* are reviewed and updated on an ongoing basis and are republished biennially. Each revised edition incorporates current evidence-based practice, emerging regulatory requirements and reflects changing technology and nursing practice.

The 2015-2017 edition of the ASPAN *Standards* contains principles of safety and ethics in perianesthesia practice, perianesthesia practice standards, evidence-based clinical practice guidelines, practice recommendations, position statements, resources from partnering organizations and interpretive statements which provide clarity and definition to key elements of the standards.

New content in this publication includes an updated practice recommendation for care of the adult patient with obstructive sleep apnea, a new practice recommendation for the prevention of unwanted sedation in the adult patient, a position statement on social media and perianesthesia practice, a position statement on care of the perinatal patient and a position statement on the nurse of the future.

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ASPAN Position Statements



ASPAN
American Society of PeriAnesthesia Nurses

www.aspan.org/Clinical-Practice/Position-Statements

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Clinical Narratives
Position Statements
Practice Resources
Clinical Guidelines
ASPAN Standards
Competency Based Orientation
Competency Based Orientation (UAP)
Patient Classification
Safety in Practice
CSP Abstracts

POSITION STATEMENTS

The American Society of PeriAnesthesia Nurses has formulated the following Position Statements:

1. A Position Statement on the PeriAnesthesia Patient with a Do-Not-Resuscitate Advance Directive
2. A Position Statement on Registered Nurse Utilization of Unlicensed Assistive Personnel
3. A Position Statement on "On Call/Work Schedule"
4. A Joint Position Statement on ICU Overflow Patients developed by ASPAN, AACN, and ASA's Anesthesia Care Team Committee and Committee on Critical Care Medicine and Trauma Medicine
5. [A Position Statement for Medical-Surgical Overflow Patients in the Postanesthesia Care Unit and Ambulatory Surgery Unit](#)
6. A Position Statement on Safe Medication Administration
7. A Position Statement on the Older Adult
8. A Position Statement on the Pediatric Patient
9. A Position Statement on Workplace Violence in the PeriAnesthesia Settings
10. A Position Statement on Substance Abuse in PeriAnesthesia Practice
11. A Position Statement on Social Media and PeriAnesthesia Practice

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The CMS Anesthesia Standards



ASA Guidelines and Standards

American Society of Anesthesiologists

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Notice: ASA is now accepting 2013 Committee Nominations - Deadline: January 15, 2012

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Standards, Guidelines, Statements and Other Documents

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ASA Standards, Guidelines and Statements provide guidance to improve decision-making and promote beneficial outcomes for the practice of anesthesiology. They are not intended as unique or exclusive indicators of appropriate care. The interpretation and application of Standards, Guidelines and Statements takes place within the context of local institutions, organizations and practice conditions. A departure from one or more recommendations may be appropriate if the facts and circumstances demonstrate that the rendered care met the physician's duty to the patient.

Standards provide rules or minimum requirements for clinical practice. They are regarded as generally accepted principles of patient management. Standards may be modified only under unusual circumstances, e.g., extreme emergencies or unavailability of equipment.

Guidelines are systematically developed recommendations that assist the practitioner and patient in making decisions about health care. These recommendations may be adopted, modified, or rejected according to clinical needs and constraints and are not intended to replace local institutional policies. In addition, practice guidelines are not intended as standards or absolute requirements, and their use cannot guarantee any specific outcome. Practice guidelines are subject to revision as warranted by the evolution of medical

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Anesthesia 1000

- Must be provided in well organized manner under qualified doctor (an example is the Director of Anesthesiology)
 - Even in states where CRNAs do not need to be supervised need qualified doctor to be medical director of anesthesia (not in CAH)
 - Final revision changed the section on the criteria for the qualification of the anesthesia director
 - Service responsible for all anesthesia administered in the hospital
- Optional service and must be integrated into hospital QAPI

ASA Position on Director of Anesthesiology

STATEMENT ON THE ANESTHESIA CARE TEAM

Committee of Origin: Anesthesia Care Team

<http://asahq.org/>

(Approved by the ASA House of Delegates on October 18, 2006, and last amended on October 21, 2009)

Anesthesiology is the practice of medicine including, but not limited to, preoperative patient evaluation, anesthetic planning, intraoperative and postoperative care and the management of systems and personnel that support these activities. In addition, anesthesiology involves perioperative consultation, the prevention and management of untoward perioperative patient conditions, the treatment of acute and chronic pain, and the care of critically ill patients. This care is personally provided by or directed by the anesthesiologist.

In the interest of patient safety and quality of care, the American Society of Anesthesiologists believes that the involvement of an anesthesiologist in the perioperative care of every patient is optimal. Almost all anesthesia care is either provided personally by an anesthesiologist or is provided by a nonphysician anesthesia provider directed by an anesthesiologist. The latter mode of anesthesia delivery is called the Anesthesia Care Team and involves the delegation of monitoring and appropriate tasks by the physician to nonphysicians. Such delegation should be specifically defined by the anesthesiologist and should also be consistent with state law or regulations and medical staff policy. Although selected tasks of overall anesthesia care may be delegated to qualified members of the Anesthesia Care Team, overall responsibility for the Anesthesia Care Team and the patients' safety rests with the anesthesiologist.

Core Members of the Anesthesia Care Team

The Anesthesia Care Team includes both physicians and nonphysicians. Each member of the team has an obligation to accurately identify themselves and other members of the team to patients and family members. Anesthesiologists should not permit the misrepresentation of nonphysician personnel as resident physicians or practicing physicians. The nomenclature below is appropriate terminology for this purpose.

Physicians:

ANESTHESIOLOGIST – director of the anesthesia care team – a physician licensed to practice medicine who has successfully completed a training program in anesthesiology accredited by the ACGME, the American Osteopathic Association or equivalent organizations.

131

Anesthesia Definitions 1000

- **Anesthesia** involves administration of medication to produce a blunting or loss of;
 - Pain perception (analgesia)
 - Voluntary and involuntary movements
 - Autonomic function
 - Memory and or consciousness
- **Analgesia** (pain) is use of medication to provide pain relief thru blocking pain receptor in peripheral and or CNS where patient does not lose consciousness but does not perceive pain.

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Anesthesia Bucket 4 Things 1000

- Anesthesia exists on a continuum
- There is not a bright line that distinguishes when the drug's properties from analgesia to anesthesia
- CMS has definitions of what constitutes anesthesia: general anesthesia, regional (spinal or epidural), monitored anesthesia care (MAC), including deep sedation
- For the most part, definitions follow the ASA practice guidelines
 - Anesthesiology 2002; 96:1004-17

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- **General anesthesia:** a drug-induced loss of consciousness during which patients are not arousable, even by painful stimulation. The ability to independently maintain ventilatory support is often impaired. Patients often require assistance in maintaining a patent airway, and positive pressure ventilation may be required because of depressed spontaneous ventilation or drug-induced depression of neuromuscular function. Cardiovascular function may be impaired. For example, a patient undergoing major abdominal surgery involving the removal of a portion or all of an organ would require general anesthesia in order to tolerate such an extensive surgical procedure. General anesthesia is used for those procedures when loss of consciousness is required for the safe and effective delivery of surgical services;
- **Regional anesthesia:** the delivery of anesthetic medication at a specific level of the spinal cord and/or to peripheral nerves, including epidurals and spinals and other central neuraxial nerve blocks, is used when loss of consciousness is not desired but sufficient analgesia and loss of voluntary and involuntary movement is required. Given the potential for the conversion and extension of regional to general anesthesia in certain procedures, it is necessary that the administration of regional and general anesthesia be delivered or supervised by a practitioner as specified in 42 CFR 482.52(a).

Monitored Anesthesia Care (MAC)

- Anesthesia care that includes monitoring of patient by a person qualified to give anesthesia (like anesthesiologist or CRNA)
- Include potential to convert to a general or regional anesthetic (MAC)
- Deep sedation/analgesia is included in a MAC
- Deep sedation where drug induced depression of consciousness during which patient can not easily be aroused but responds purposefully following repeated or painful stimulus
 - Removed : An example of deep sedation is when Propofol is used for a screening colonoscopy

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Definition of MAC by CMS

- **Monitored anesthesia care (MAC):** anesthesia care that includes the monitoring of the patient by a practitioner who is qualified to administer anesthesia as defined by the regulations at §482.52(a). Indications for MAC depend on the nature of the procedure, the patient's clinical condition, and/or the potential need to convert to a general or regional anesthetic. Deep sedation/analgesia is included in MAC.
 - Deep sedation/analgesia: a drug-induced depression of consciousness during which patients cannot be easily aroused but respond purposefully following repeated or painful stimulation. The ability to independently maintain ventilatory function may be impaired. Patients may require assistance in maintaining a patent airway, and spontaneous ventilation may be inadequate. Cardiovascular function is usually maintained. Because of the potential for the inadvertent progression to general anesthesia in certain procedures, it is necessary that the administration of deep sedation/analgesia be delivered or supervised by a practitioner as specified in 42 CFR 482.52(a).

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Anesthesia Services Pain Bucket 1000

- Services **not** subject to anesthesia administration and supervision requirements
 - **Topical or local anesthesia** ; application or injection of drug to stop a painful sensation
 - **Minimal sedation**; drug induced state in which patient can respond to verbal commands such as oral medication to decrease anxiety for MRI
 - **Moderate or conscious sedation**; in which patients respond purposely to verbal commands, either alone or by light tactile stimulation

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Definitions of Analgesia (Pain)

- **Moderate sedation/analgesia: ("Conscious Sedation"):** *a* drug-induced depression of consciousness during which patients respond purposefully to verbal commands, either alone or accompanied by light tactile stimulation. No interventions are required to maintain a patent airway, and spontaneous ventilation is adequate. Cardiovascular function is usually maintained. CMS, consistent with ASA guidelines, does not define moderate or conscious sedation as anesthesia (71FR 68690-1).
- **Minimal sedation:** *a* drug-induced state during which patients respond normally to verbal commands. Although cognitive function and coordination may be impaired, ventilator and cardiovascular functions are unaffected. This is also not anesthesia.
- **Topical or local anesthesia:** *the application or injection of a drug or combination of drugs to stop or prevent a painful sensation to a circumscribed area of the body where a painful procedure is to be performed. There are generally no systemic effects of these medications, which also are not anesthesia, despite the name.*

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Anesthesia Services 1000

- Rescue capacity
 - Sedation is a continuum
 - It is not always possible to predict how any individual patient will respond
 - So may need to rescue by one with expertise in airway management and advanced life support
 - Must have procedures in place to rescue patients whose sedation becomes deeper than initially intended

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Anesthesia Services 1000

- TJC has standards also on how to safely perform moderate or procedural sedation and anesthesia in the PC chapter
- Still need to do a **pre-sedation assessment** and post-sedation assessment but since not anesthesia not a pre or post-anesthesia assessment
- Also references the need to follow **nationally standards of practice** such as ASA (American Society of Anesthesiologists), ACEP (American College of Emergency Physicians) and ASGE (American Society for GI Endoscopy), AGA, ENA, ADA, etc.
 - Listed at the end as additional resources

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One Anesthesia Service 1000

- Anesthesia services must be under one anesthesia services under direction of qualified physician no matter where performed through out the hospital
- Including if done in any of the following:
 - Operating room for both inpatients and outpatients
 - OB
 - Radiology (interventional radiology),
 - ED
 - Psychiatry (ECT)
 - Endoscopy, pain management clinics etc.

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Anesthesia Services under Qualified Director

- Anesthesia services must be under the direction of one individual who is a qualified doctor (1000)
- Need to have medical staff rules and regulations establishing the criteria for the qualifications for the director of anesthesia services
- MS establishes this criteria for director's qualifications
- The board approves after consideration of the medical staff's recommendation
- Must be consistent with state law and acceptable standards of practice

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Interpretation from CMS

- The regulation states, "...under the direction of a qualified doctor of medicine or osteopathy." This means the anesthesia service can be directed by any type of MD or DO who is qualified.
- You are correct that in most hospitals with an anesthesia service, an anesthesiologist would "generally" be the director. However, some hospitals do not have an anesthesiologist on staff. If a hospital provides any type of anesthesia service, the hospital would have to find an MD or DO that has the **qualifications** to be the Director of Anesthesia Services in the hospital.
- The hospital would establish criteria for determining that a particular MD or DO was qualified to be the director (such as knowledge of anesthesia procedures, anesthesia/sedation/analgesia medications, State scope of practice rules, National Standards of practice, administrative skills, management, and other criteria). Hospitals already must establish criteria for determining whether a physician is qualified to provide care and which types of care. Therefore, a hospital should be able to ensure that whichever MD or DO they select as the Director of Anesthesia Services is qualified for that position.

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CMS Manual

The anesthesia services must be under the direction of one individual who is a qualified doctor of medicine (MD) or doctor of osteopathy (DO). Consistent with the requirement at §482.12(a)(4) for it to approve medical staff bylaws, rules and regulations, the hospital's governing body approves, after considering the medical staff's recommendations, medical staff rules and regulations establishing criteria for the qualifications for the director of the anesthesia services. Such criteria must be consistent with State laws and acceptable standards of practice.

144

Anesthesia Services Who Can Give? 1000

- Hospital needs to have policies and procedures that are based on nationally recognized guidelines as to whether it is anesthesia or analgesia
 - Be sure to cite standard such as ASA, ASGE, ACEP etc.
- Hospitals need to determine if sedation done in the ED or procedures rooms is anesthesia or analgesia
- Must take into consideration for P&P characteristics of patients served, skill set of staff and what medications are being used
- This standard also sets forth the supervision requirements for staff who administer anesthesia

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Supervision and Privileges 1000

- P&Ps need to establish minimum qualifications and supervision requirements including moderate sedation
 - MS credentialing standards and the nursing standards exist to make sure staff are qualified and competent
 - Want to make sure that staff administering drugs are qualified
 - Drugs must be given with accepted standards of practice
 - MS bylaws address criteria for determining privileges and to apply the criteria to those who request privileges

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Supervision and Privileges 1000

- If nursing staff give IV medication then must have be competent in specified areas
 - This is one of the education requirements of CMS
 - Also training on restraint and seclusion, infection control and hand hygiene, abuse and neglect, advance directives, organ donation, IV and blood and blood products and ED staff with ED common emergencies, timing of medication, medication error, ADE and drug incompatibilities
- Must have P&P to look at adverse events, medication errors and other safety and quality indicators
 - Must periodically re-evaluate these and include in PI

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Anesthesia Services 1000

- Hospital Medical Staff determine the qualifications for the Director of Anesthesia
- Must be in accordance with the state law and acceptable standards of practice
- Anesthesia service is responsible for developing policies and procedures governing all categories of anesthesia service
- This includes the minimum qualification for each category of practitioner who is permitted to provide anesthesia services

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Anesthesia Survey Procedure 1000

- Surveyor is suppose to ask for a copy of the organizational chart for anesthesia
- Make sure MD or DO has authority and responsibility for directing anesthesia services throughout the hospital
- Anesthesia must be integrated into the QAPI program
 - Every department has a role in PI including anesthesia
 - See Anesthesia Quality Institute (AQI) which is home to national anesthesia clinical outcomes registry (NACOR) and has list of things to measure

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What PI Do You Measure??

Process indicators: on time starting, prophylactic antibiotic administration, adherence to central line bundle, normothermia in the PACU, number of patient complaints

Are anesthesia staff educated on the CMS grievance and TJC Complaint standard?

Yes No

Clinical outcome indicators-patient satisfaction, number of cases completed without any event, number of each critical event occurring by location (high spinal, epidural hematoma, infection after regional, perioperative MI, death, unplanned difficult airway, local anesthesia toxicity, medication error, incorrect patient, OR fire, transfusion reaction, new stroke, visual loss, Intraoperative awareness, peripheral neurologic deficit, etc)

CMS, 2011 outpatient surgical measure is antibiotic timing and is described by CMS as "Percentage of outpatients having surgery who were given the right kind of antibiotic at the right time (within one hour before surgery) to help prevent infection of surgical wounds." This measure is already in place for inpatient data and will be used in conjunction to obtain a more comprehensive view of the quality of care being provided in hospitals.

Case information; no untoward event, significant delay, case cancelled, equipment problem, extended PACU stay, unanticipated ICU admission, unanticipated hospital admission, death, cardiac arrest, anaphylaxis, malignant hyperthermia, transfusion reaction, visual loss, stroke, PONV, PACU pain control in adequate, hypotension or hypothermia in the PACU, vascular access complication, infection after regional anesthesia, high spinal, postdural puncture headache,

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What Do You Measure?

Reason for Review
An-1 CNS complication
An-2 Peripheral neurologic deficit
An-3 AML post anesthesia
An-4 Cardiac Arrest post anesthesia
An-5 Respiratory Arrest post anesthesia
An-6 Death w/in 48 hours of anesthesia
An-7 Unplanned adm w/in 24 hours d/t anesthesia
An-8 Unplanned adm to ICU w/in 24 hours of anes
An-9 Pulmonary Edema w/in 24 hrs of anesthesia
An-10 Aspiration pneumonitis w/in 48 hours
An-13 Anesthesia Awareness
M-1 Death w/i 48 hours of surgical/invasive proc
M-2 Intra-operative death
M-3 Death w/i immediate recover time of surg/inv
M-4 Death w/i 48 hours of IV sedation
S-1 Unscheduled admission following outpt proc

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What Do You Measure?

S-1 Unscheduled admission following outpt proc
S-2 Unplanned return to surgery
S-3 Foreign object/material found/left in wound
S-4 Burn or non-surgical trauma
S-5 Wrong procedure or wrong pt
S-9 Nerve damage noted post-operatively
S-12 Any untoward patient reaction in OR/PACU/ENDO
S-16 Post Operative Complication
S-17 Path/operative dx mismatch
S-20 Accidental puncture or laceration during proc
S-23 Mismatch pre and post op diagnosis
ModSed-1 Reversal Agent Administered
ModSed -2 Hemodynamic Instability
ModSed -3 Extended recovery time
ModSed -4 Unplanned Admission
ModSed -5 Unplanned Surgery
ModSed-7 Decreased O2 Sat

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AQI Has Data Capture Sheets

Anesthesia Quality Improvement PACU Discharge

Case Info

Date	
MR #	
ASA Class	

Anesthesia type

Provider ID	
CRNA ID	
Additional provider	



Patient is awake and able to contribute to assessment

Yes	No

www.aqihq.org/qualitymeasurements/tools.aspx

Patient Physical Exam:

	Yes	No
Mental Status at baseline (Y/N)		
Vital Signs at baseline (Y/N)		
Airway patency at baseline (Y/N)		

Pain Score (10-point VAS scale):

on PACU admission		
Highest pain score		
Pain score at time of assessment		

Nausea or vomiting requiring treatment

--	--

Any occurrence of vomiting

--	--

Did the patient experience an unexpected event during perioperative care?

	Yes	No
Unplanned ICU admission		
Unplanned hospital admission		
Intraoperative awareness		
Epidural hematoma		
Peripheral neurologic deficit		
Corneal abrasion		
Agitation requiring treatment		
Seizure		

	Yes	No
Anaphylaxis		
Other medication reaction		
Delayed emergence		
Respiratory arrest		
Reintubation		
Dental trauma		
Aspiration		
Cardiac arrest		

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Anesthesia Quality Improvement Intra-Operative

Case Info

Date	
MR #	
ASA Class	

Anesthesia type

Provider ID	
CRNA ID	
Additional provider	

NO UNTOWARD EVENT

--

Death (Excludes ASA 6 patients presenting for harvesting)

--

Case Cancelled

--

Unplanned ICU Admission

--

Operation on incorrect site

--

Case Delayed

--

Unplanned admission of outpatient

--

Operation on incorrect patient

--

Incorrect procedure

--

Pulmonary Edema

--

Cardiac Arrest

--

Bronchospasm req treatment

--

Hypotension requiring unanticipated therapy with a continuous infusion or pressor agents

--

New PVC's, bradycardia, atrial fibrillation, or other dysrhythmias requiring unanticipated therapy

--

Myocardial ischemia, indicated by ST segment changes or echocardiography

--

Unanticipated difficult airway

--

Unplanned reintubation

--

Aspiration

--

Inability to secure an airway

--

Unplanned respiratory arrest

--

Laryngospasm

--

Anaphylaxis

--

Transfusion Reaction

--

Delayed emergence

--

Other unanticipated adverse reaction to medication

--

Use of sedation/narcotic reversal agents

--

Inability to reverse neuromuscular blockade

--

Malignant Hyperthermia

--

Medication error

--

High spinal

--

Failed regional anesthetic

--

Unintended dural puncture

--

Vascular access complication - vessel injury

--

Vascular access complication - pneumothorax

--

Local anesthesia systemic toxicity

--

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AQI Core Measures Outcomes of Anesthesia

Intraoperative Events.

- Death (Excludes ASA 6 patients presenting for organ harvest)
- Cardiac
 - Cardiac arrest
 - New PVCs, bradycardia, atrial fibrillation, or other dysrhythmias requiring unanticipated therapy
 - Myocardial ischemia, indicated by ST segment changes or echocardiography
 - Hypotension requiring unanticipated therapy with a continuous infusion of pressor agents
 - Pulmonary edema
- Respiratory
 - Unanticipated difficult airway
 - Inability to secure an airway
 - Unplanned reintubation
 - Unplanned respiratory arrest
 - Aspiration
 - Laryngospasm
 - Bronchospasm requiring unanticipated treatment
- Medication
 - Anaphylaxis
 - Other unanticipated adverse reaction to a medication
 - Malignant hyperthermia
 - Transfusion reaction
 - Medication error
 - Use of sedation/narcotic reversal agents (e.g. flumazenil, naloxone)
 - Inability to reverse neuromuscular blockade
 - Delayed emergence
- Procedural
 - Vascular access complication: vessel injury
 - Vascular access complication: pneumothorax
 - High spinal
 - Local anesthesia systemic toxicity
 - Failed regional anesthetic
 - Unintended dural puncture

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Anesthesia Survey Procedure 1000

- Surveyor to look in directors file
- Will review job or position description of MD/DO director and look for appointment
- Will make sure privileges and qualifications are consistent with the criteria adopted by the board
- Will confirm directors responsibilities include;
 - Planning, directing, and supervision of all activities
 - Removed section on establishing staffing schedules
 - Evaluate the quality and appropriateness of anesthesia services provided to patients as part of PI process

156

Anesthesia Survey Procedure 1000

- Surveyor is suppose to request and review all of the anesthesia policies and procedures
- Will make sure the anesthesia apply to every where in the hospital where anesthesia services are provided
- Will make sure the P&P indicate the necessary qualifications that each clinical practitioner must possess in order to administer anesthesia as well as moderate sedation or other forms of analgesia

157

Anesthesia Survey Procedure 1000

- Surveyor is to make sure that the clinical applications are considered involving analgesia such as moderate sedation as opposed to anesthesia
- Document what national guidelines are being followed
- The surveyor will make sure the hospital has an adverse event system related to both anesthesia and analgesia
 - Are they tracked and acted upon (incident report, RCA, etc.)

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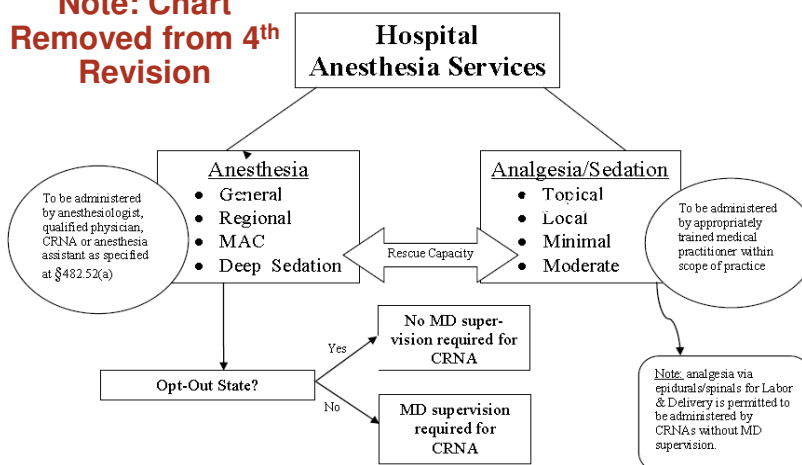
Organization and Staffing 1001

- Anesthesia (general, regional, MAC including deep sedation) can only be administered by;
 - Qualified anesthesiologist or CRNA
 - Anesthesiology assistant (AA) under the supervision of anesthesiologist who is immediately available if needed
 - Dentist, oral surgeon, or podiatrist who is qualified to administer anesthesia under state law
 - A MD or DO other than anesthesiologist (must be qualified)
 - Lots of discussion on this
 - Hospital needs to follow standards of anesthesia care when establishing P&P governing anesthesia administration by these types of practitioners as well as MDs or DOs who are **not** anesthesiologists

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Who Is Qualified to Give Anesthesia

**Note: Chart
Removed from 4th
Revision**



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Who Can Administer Anesthesia

Administration by an MD/DO/dentist/oral surgeon/podiatrist

The hospital's anesthesia services policies must address the circumstances under which an MD or DO who is not an anesthesiologist, a dentist, oral surgeon or podiatrist is permitted to administer anesthesia. In the case of a dentist, oral surgeon or podiatrist, administration of anesthesia must be permissible under State law and comply with all State requirements concerning qualifications. Hospitals should conform to generally accepted standards of anesthesia care when establishing policies governing anesthesia administration by these types of practitioners as well as MDs or DOs who are not anesthesiologists.

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Organization and Staffing 1001

- CRNA can be supervised by the operating surgeon or the anesthesiologist
- CRNA may not require supervision if state got an exemption from supervision₁
- Governor sends a letter to CMS requesting this after attesting that the State Medical Board and Nursing Board were consulted and in best interests of the state
- List of 17 state exemptions at www.cms.hhs.gov/CFCsAndCoPs/02_Spotlight.asp
 - Iowa, Nebraska, Idaho, Minnesota, New Hampshire, New Mexico, Kansas, Kentucky, North Dakota, Washington, Alaska, Oregon, South Dakota, Wisconsin, Montana, Colorado, and California

162

Administering 1001

- Need P&P concerning who may administer analgesia
 - Topical, local, minimal sedation and moderate sedation
 - Consistent with scope of practice set by state law
- General, regional, MAC and deep sedation can only be administered by the 5 categories mentioned
- Hospital must follow generally accepted standards of anesthesia care if anyone other than anesthesiologist, CRNA, or AA does
- Need policy on supervision also

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Who Can Administer Anesthesia 1001

- CRNA can administer anesthesia if under the operating surgeon or by an anesthesiologist
- If supervised by an anesthesiologist must be **immediately available**
- What does immediately available mean?
- Anesthesiologist must be physically located in the same area as the CRNA
- Example: in the same operative suite , same procedure room, same L&D unit and nothing prevents from immediate hands on intervention

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CRNA Supervision

- No supervision if in one of the 17 states that has opted out and so no longer requires it
- Otherwise must be supervised by
 - Operating practitioner who is performing the procedure or
 - Anesthesiologist who is immediately available
- Immediately available means anesthesiologist must be located within the same area of the CRNA and not occupied to prevent him/her from immediately conducting hands on intervention if needed
 - If CRNA in OR then anesthesiologist must be somewhere in the OR suite

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Administration by a CRNA

Unless the hospital is located in a State that has chosen to opt out of the CRNA supervision requirements, a CRNA administering general, regional and monitored anesthesia must be supervised either by the operating practitioner who is performing the procedure, or by an anesthesiologist who is immediately available.

Hospitals should conform to generally accepted standards of anesthesia care when establishing policies for supervision by the operating practitioner. An anesthesiologist is considered “immediately available” when needed by a CRNA under the anesthesiologist’s supervision only if he/she is physically located within the same area as the CRNA, e.g., in the same operative suite, or in the same labor and delivery unit, or in the same procedure room, and not otherwise occupied in a way that prevents him/her from immediately conducting hands-on intervention, if needed.

166

Improper Supervision of Anesthesia Services

- A federal qui tam whistle blower lawsuit was filed by former anesthesiologist and professor Dr. Dennis O'Connor
- Investigated by the US Dept of Justice
- Hospital in California pays \$1.2 million to resolve claims of improper supervision of anesthesia services
- Said no supervisory anesthesiologist was present or immediately available in violation of federal law
- Anesthesia records pre-filled out to make it look like anesthesiologist were there

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Don't Want a False Claims Act Lawsuit

UC-Irvine to Pay \$1.2M to Settle Claims of Improper Supervision for Anesthesia

Written by Molly Gamble | March 27, 2013

Social Sharing        

The Regents of the University of California, the university's governing body, has agreed to pay \$1.2 million to resolve allegations that anesthesia was routinely administered at University of California-Irvine by healthcare providers when a supervisory anesthesiologist was not present, according to a news [release](#) from the law offices of Louis J. Cohen, PC, which represented the whistleblower in this case.

The settlement stems from a 2008 lawsuit filed by a former UC-Irvine anesthesiologist. His complaint triggered a "multi-year" investigation by the Department of Justice, according to the release.

The complaint alleged that certified registered nurse anesthetists or residents at UC-Irvine administered anesthesia in many instances when the supervisory anesthesiologist was in another facility, which violates federal regulations.

The complaint also alleged that postoperative evaluations would routinely be provided by unsupervised or unlicensed residents, which is also a violation of federal regulations.

A comment from UC-Irvine was not provided in the release.

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Anesthesiology Assistant 1001

- Some states have a practice act for AAs or anesthesiology assistants
- An AA may administer anesthesia only when under the direct supervision of an anesthesiologist only
- Anesthesiologist must also be immediately available if needed
- This means physically in the same department and not occupied in a way to prevent immediate hands on intervention if needed

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Administration by an anesthesiologist's assistant

An anesthesiologist's assistant may administer anesthesia when under the direct supervision of an anesthesiologist. The anesthesiologist must be immediately available if needed. An anesthesiologist is considered "immediately available" to assist the anesthesiologist's assistant under the anesthesiologist's supervision only if he/she is physically located within the same area as the anesthesiologist's assistant, e.g., in the same operative suite, or in the same labor and delivery unit, or in the same procedure room, and not otherwise occupied in a way that prevents him/her from immediately conducting hands-on intervention, if needed.

An anesthesiologist's assistant is defined in §410.69(b) as a "...person who – (1) works under the direction of an anesthesiologist; (2) is in compliance with all applicable requirements of State law, including any licensure requirements the State imposes on nonphysician anesthetists; and (3) is a graduate of a medical school-based anesthesiologist's assistant education program that – (A) is accredited by the Committee on Allied Health Education and Accreditation; and (B) includes approximately two years of specialized basic science and clinical education in anesthesia at a level that builds on a premedical undergraduate science background."

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The screenshot shows the homepage of the Anesthesiologist Assistant website. The header features the title "Anesthesiologist Assistant" in a large, bold font. Below the header, there is a navigation menu with links to HOME, EDUCATION, VERIFY AA, JOB PLACEMENT, LEGISLATION, BOOKSTORE, and CONTACT. The main content area is divided into several sections. On the left, there is a sidebar with links to AA JOB REGISTRATION and a "Sign Up Today" button. The central text area welcomes visitors to the "Ultimate Anesthesiologist Assistant Resource website!" and includes a section titled "Who are Anesthesiologist Assistants?" which discusses the growing shortage of these professionals. To the right of this text are several advertisements, including one for the University of Phoenix, another for becoming a Nurse Anesthetist, and one for Health Services Careers. Further right, there are social media links for Twitter, Facebook, and LinkedIn, as well as links to the Anesthesiologist Assistant forum, DNAP.COM, ICD 10 CODES, and WebMD. The footer of the website displays the URL <http://anesthesiaassistant.com> and a page number of 171.

Anesthesia Services Policies 1001

- MS bylaws or R/R must include criteria for determining anesthesia privileges
- Board must approve the specific anesthesia service privilege for each practitioner who does anesthesia services
- Must address the type of supervision required, if any, and must specify who can supervise CRNA (unless exempted)
- Privileges must be granted in accordance with state law and hospital policy

Supervision by Operating Surgeon 1002

- If hospital allows supervision by operating surgeon of CRNAs
- Medical staff bylaws or R/R must specify for each category of operating practitioners
- The type and complexity of the procedures that the category of practitioner may supervise
- See resources at the end that discuss standards of practice on credentialing and privileging

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Survey Procedure 1001

- Surveyor is to review the qualifications of individuals allowed to give anesthesia to make sure they are qualified
- Make sure licenses and certifications are current
- Determine if state has opted out for CRNA supervision
- Review the hospital P&P to make sure supervision of CRNA and AA meets requirements
- Review qualifications of other anesthesia services to make sure they are consistent with the hospital anesthesia policies

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Anesthesia Services and Policies 1002

- Anesthesia must be consistent with needs of patients and resources
- P&P must include delineation of pre-anesthesia and post-anesthesia responsibilities
- Must be consistent with the standards of care
- Policies include;
 - Consent
 - Infection Control measures
 - Safety practices in all areas
 - How hospital anesthesia service needs are met

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Anesthesia Policies Required 1002

- Policies required (continued);
 - Protocols for life support function such as cardiac or respiratory emergencies
 - Reporting requirements
 - Documentation requirements
 - Equipment requirements
 - Monitoring, inspecting, testing and maintenance of anesthesia equipment
 - Pre and post anesthesia responsibilities

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Pre-Anesthesia Assessment 1003

- Pre-anesthesia evaluation must be performed with 48 hours prior to the surgery
 - Including inpatient and outpatient procedures
- For regional, general, and MAC including deep sedation
- Not required for moderate sedation but still need to do pre sedation assessment
- Pre-anesthesia assessment must be done by some one qualified person to administer anesthetic (non-delegable)

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Pre-anesthesia Evaluation 1003

- Must have policies to make sure the pre-anesthesia guidelines are met
- Pre-anesthesia evaluation must be completed, documented and done by one qualified to administer anesthesia within 48 hours
 - Can not delegate the pre-anesthesia assessment to someone who is not qualified which is 5 categories mentioned
- Must be done within 48 hours of surgery or procedure

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5 Qualified to do Pre-Anesthesia Assessment

- Anesthesiologist
- CRNA under the supervision of operating surgeon or anesthesiologist unless state is exempt
- AA under supervision of anesthesiologist
- MD or DO other than an anesthesiologist
- A dentist, oral surgeon, or podiatrist who is qualified to administer anesthesia under State law

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Pre-anesthesia Evaluation 1003

- Delivery of **first dose of medication** for inducing anesthesia marks end of 48 hour time frame
- Pre-anesthesia assessment must be done for generals, regional, or MAC which includes deep sedation
- If moderate sedation current practice dictates a pre-procedure assessment but not a pre-anesthesia assessment
- See TJC standards at the end of presentation on presedation assessment for patients having moderate sedation

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Pre-anesthesia Evaluation 1003

- CMS says pre-anesthesia must be done within 48 hours of procedure or surgery
- However, some of the elements in the evaluation can be collected prior to the 48 hours time frame but it can never be more than 30 days
 - If you saw a patient on Friday for Monday surgery would need to show that on Monday there were no changes
- CMS also specifies the four of the six required elements that can be performed within 30 days

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Pre-Anesthetic Assessment 1003

- Must include;
 - Review of medical history, including anesthesia, drug, and allergy history (within **48 hours**)
 - Interview and exam the patient
 - Within **48 hours** and rest are updated in 48 hours but can be collected within 30 days
 - Notation of anesthesia risk (such as ASA level)
 - Potential anesthesia problems identification (including what could be complication or contraindication like difficult airway, ongoing infection, or limited intravascular access)

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Pre-Anesthetic Assessment 1003

- Pre-anesthetic Assessment to include (continued);
 - Additional data or information in accordance with SOC or SOP
 - Including information such as stress test or additional consults
 - Develop plan of care including type of medication for induction, maintenance, and post-operative care
 - Of the risks and benefits of the anesthesia

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Developed by the American Association of Nurse Anesthetists - 1991

PREANESTHESIA EVALUATION		Age	Sex	M	F	Height	Weight
						in/cm	lb/kg
Proposed Procedure		Pre-Procedure Vital Signs B/P P R T					
Previous Anesthesia / Operations	None <input type="checkbox"/>	Current Medications					None <input type="checkbox"/>
Family History of Anesthesia Complications	None <input type="checkbox"/>	Allergies					None <input type="checkbox"/>
AIRWAY / TEETH / HEAD & NECK		History From: <input type="checkbox"/> Patient <input type="checkbox"/> Significant Other <input type="checkbox"/> Parent / Guardian <input type="checkbox"/> Chart <input type="checkbox"/> Communication / Language Problems <input type="checkbox"/> Poor Historian					
SYSTEM	WNL	COMMENTS					DIAGNOSTIC STUDIES
RESPIRATORY Asthma Productive Cough Bronchitis Recent URI COPD SOB Dyspnea Tuberculosis Otitis media Pneumonia	<input type="checkbox"/>	Tobacco Use: <input type="checkbox"/> Yes <input type="checkbox"/> No Packs / Day for Years					EKG Chest X-ray Pulmonary Studies
CARDIOVASCULAR Abnormal EKG Hypertension Angina MI ASHD Murmur CHF Pacemaker Dysrhythmia Rheumatic Fever Exercise Tolerance Vascular Disease	<input type="checkbox"/>						
HEPATO / GASTROINTESTINAL	<input type="checkbox"/>	Ethanol Use: <input type="checkbox"/> Yes <input type="checkbox"/> No Frequency					

ASA Physical Status Classification System

- ASA PS I – normal healthy patient
- ASA PS II – patient with mild systemic disease
- ASA PS III – patient with severe systemic disease
- ASA PS IV – patient with severe systemic disease that is a constant threat to life
- ASA PS V – moribund patient who is not expected to survive without the operation
- ASA PS VI – declared brain-dead patient whose organs are being removed for donor purposes

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Survey Procedure Pre-anesthesia Evaluation

- Surveyor to review sample of inpatient and outpatient records who had anesthesia
- Make sure pre-anesthesia evaluation done and by one qualified to deliver anesthesia
- Determine the pre-anesthesia evaluation had all the required elements
- Make sure done within 48 hours before first dose of medication given for purposes of inducing anesthesia for the surgery or procedure
- ASA and AANA has pre-anesthesia standards that hospitals should be familiar with

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ASA Guideline Pre-anesthesia

- Preanesthesia Evaluation ¹
 - Patient interview to assess Medical history, Anesthetic history, Medication history
- Appropriate physical examination
- Review of objective diagnostic data (e.g., laboratory, ECG, X-ray)
- Assignment of ASA physical status
- Formulation of the anesthetic plan and discussion of the risks and benefits of the plan with the patient or the patient's legal representative
- ¹ www.asahq.org/publicationsAndServices/standards/03.pdf American Society of Anesthesiologist

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STANDARDS FOR BASIC ANESTHETIC MONITORING

Committee of Origin: Standards and Practice Parameters

(Approved by the ASA House of Delegates on October 21, 1986, and last amended on October 20, 2010 with an effective date of July 1, 2011)

These standards apply to all anesthesia care although, in emergency circumstances, appropriate life support measures take precedence. These standards may be exceeded at any time based on the judgment of the responsible anesthesiologist. They are intended to encourage quality patient care, but observing them cannot guarantee any specific patient outcome. They are subject to revision from time to time, as warranted by the evolution of technology and practice. They apply to all general anesthetics, regional anesthetics and monitored anesthesia care. This set of standards addresses only the issue of basic anesthetic monitoring, which is one component of anesthesia care. In certain rare or unusual circumstances, 1) some of these methods of monitoring may be clinically impractical, and 2) appropriate use of the described monitoring methods may fail to detect untoward clinical developments. Brief interruptions of continual† monitoring may be unavoidable. These standards are not intended for application to the care of the obstetrical patient in labor or in the conduct of pain management.

1. STANDARD I

Qualified anesthesia personnel shall be present in the room throughout the conduct of all general anesthetics, regional anesthetics and monitored anesthesia care.

1.1 Objective –

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ETCO₂ for Moderate and Deep Sedation ASA

3.2.4 During regional anesthesia (with no sedation) or local anesthesia (with no sedation), the adequacy of ventilation shall be evaluated by continual observation of qualitative clinical signs. During moderate or deep sedation the adequacy of ventilation shall be evaluated by continual observation of qualitative clinical signs and monitoring for the presence of exhaled carbon dioxide unless precluded or invalidated by the nature of the patient, procedure, or equipment.

<http://asahq.org/For-Healthcare-Professionals/Standards-Guidelines-and-Statements.aspx>

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ASA Practice Advisory Preanesthesia Evaluation

■ SPECIAL ARTICLE

<http://asahq.org/For-Members/Practice-Management/Practice-Parameters.aspx>

Anesthesiology 2002; 96:485-96

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Practice Advisory for Preanesthesia Evaluation

A Report by the American Society of Anesthesiologists Task Force on Preanesthesia Evaluation

PRACTICE advisories are systematically developed reports that are intended to assist decision-making in areas of patient care where scientific evidence is insufficient to develop an evidence-based model. Practice advisories provide a synthesis of opinion from experts, open forums, and other public sources. Practice advisories report the current state of scientific literature, but are not supported by literature to the same degree as standards or guidelines due to the lack of sufficient numbers of adequately controlled studies.

Advisories are not intended as guidelines, standards, or absolute requirements. The use of practice advisories cannot guarantee any specific outcome. They may be adopted, modified, or rejected according to clinical needs and constraints. Practice advisories are subject to periodic revision as warranted by the evolution of medical knowledge, technology, and practice.

Definition of Preanesthesia Evaluation

the patient's medical records, interview, physical examination, and findings from medical tests and evaluations. As part of the preanesthesia evaluation process, the anesthesiologist may choose to consult with other healthcare professionals to obtain information or services that are relevant to perioperative anesthetic care. Preoperative tests, as a component of the preanesthesia evaluation, may be indicated for various purposes, including but not limited to (1) discovery or identification of a disease or disorder that may affect perioperative anesthetic care, (2) verification or assessment of an already known disease, disorder, medical or alternative therapy that may affect perioperative anesthetic care, and (3) formulation of specific plans and alternatives for perioperative anesthetic care. For this Advisory, *perioperative* refers to the care surrounding operations and procedures.

The assessments made in the process of a preanesthesia evaluation may be used to educate the patient, organize resources for perioperative care, and formulate

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ASA Standard on Preanesthesia Care

BASIC STANDARDS FOR PREANESTHESIA CARE

Committee of Origin: Standards and Practice Parameters

(Approved by the ASA House of Delegates on October 14, 1987, and last affirmed on October 20, 2010)

These standards apply to all patients who receive anesthesia care. Under exceptional circumstances, these standards may be modified. When this is the case, the circumstances shall be documented in the patient's record.

An anesthesiologist shall be responsible for determining the medical status of the patient and developing a plan of anesthesia care.

The anesthesiologist, before the delivery of anesthesia care, is responsible for:

1. Reviewing the available medical record.
2. Interviewing and performing a focused examination of the patient to:
 - 2.1 Discuss the medical history, including previous anesthetic experiences and medical therapy.
 - 2.2 Assess those aspects of the patient's physical condition that might affect decisions regarding perioperative risk and management.
3. Ordering and reviewing pertinent available tests and consultations as necessary for the delivery of anesthesia care.
4. Ordering appropriate preoperative medications.
5. Ensuring that consent has been obtained for the anesthesia care.
6. Documenting in the chart that the above has been performed.

<http://asahq.org/For-Healthcare-Professionals/Standards-Guidelines-and-Statements.aspx>

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Standards for Nurse Anesthesia Practice

- American Association of Nurse Anesthetists (AANA) has standards for nurse anesthesia practice
- Has a section on standard for pre-anesthesia assessment and post-anesthesia assessment
- AANA website has many excellent resources
 - Includes practice documents ,
 - Standards, guidelines, joint position statements,
 - Advisory opinions, forms, resources, practice considerations, position statements, quality of care in anesthesia, and more

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AANA Standards for Nurse Anesthesia

Standard I

Perform and document a thorough preanesthesia assessment and evaluation.

Standard II

Obtain and document informed consent for the planned anesthetic intervention from the patient or legal guardian, or verify that informed consent has been obtained and documented by a qualified professional.

Standard III

Formulate a patient-specific plan for anesthesia care.

www.aana.com/resources2/professionalpractice/Pages/Standards-for-Nurse-Anesthesia-Practice.aspx

Standard IV

Implement and adjust the anesthesia care plan based on the patient's physiologic status. Continuously assess the patient's response to the anesthetic, surgical intervention, or procedure. Intervene as required to maintain the patient in optimal physiologic condition.

Standard V

Monitor, evaluate, and document the patient's physiologic condition as appropriate for the type of anesthesia and specific patient needs. When any physiological monitoring device is used, variable pitch and threshold alarms shall be turned on and audible. The CRNA should attend to the patient continuously until the responsibility of care has been accepted by another anesthesia professional.

a. Oxygenation

Continuously monitor oxygenation by clinical observation and pulse oximetry. If indicated, continually monitor oxygenation by arterial blood gas analysis.

b. Ventilation

Continuously monitor ventilation. Verify intubation of the trachea or placement of other artificial airway devices by auscultation, chest excursion, and confirmation of expired carbon dioxide. Use ventilatory pressure monitors as indicated. Continuously monitor end-tidal carbon dioxide during controlled or assisted ventilation and any anesthesia or sedation technique requiring artificial airway support. During moderate or deep sedation, continuously monitor for the presence of expired carbon dioxide.

c. Cardiovascular

Continuously monitor cardiovascular status via electrocardiogram. Perform auscultation of heart sounds as

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Intra-operative Anesthesia Record 1004

- Need policies related to the intra-operative anesthesia record
- Need intra-operative anesthesia record for patients who have general, regional, deep sedation or MAC
- Still need monitoring of moderate sedation before, during, and after but the monitoring required by this section does not apply to that
- See the TJC standards on this

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So What's In Your Policy?

MODERATE SEDATION POLICY FOR NON-ANESTHESIA STAFF

Purpose

The purpose of this policy is to set forth procedures for the management of all patients receiving moderate sedation while undergoing therapeutic, diagnostic or surgical procedures at Methodist Lebonheur Healthcare System Hospitals. These guidelines apply to all locations where moderate sedation is administered. These include, but are not limited to:

Endoscopy Suites
Critical Care areas
Emergency Department
Diagnostic Imaging
Operating Room
Cardiac Cath Lab
Starlight Room

Focus

This policy is not intended to apply to the following settings:

General anesthesia

Administration of medication intended solely to counteract anxiety
Administration of medication intended for deep sedation as defined by department(s) of anesthesia.
Management of pain before, after, or unrelated to a therapeutic or diagnostic procedure
The use of parental or oral medications in the setting of alcohol withdrawal management

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Moderate Sedation Toolkit

Moderate Sedation Toolkit for Non-Anesthesiologists

To assist VA facilities in assuring that the practice of moderate sedation is reliable and safe, the VA National Center for Patient Safety (NCPS) has developed a [Moderate Sedation Toolkit for Non-Anesthesiologists](#), based upon work done at the Durham VAMC Patient Safety Center of Inquiry.

The toolkit is composed of nine components:

1. [Facilitator's Guide](#) This introductory guide describes the moderate sedation toolkit components and provides guidelines for the sedation training facilitator including answers to frequently asked questions..
2. [Learner Objectives](#) These 18 objectives describe the knowledge, skills and behaviors that should be demonstrated by individuals who administer moderate sedation.
3. [Curriculum Guide](#) This document provides detailed information about moderate sedation practice. Topics include:
 - Introduction - general principles of moderate sedation
 - Pharmacology of commonly used medications
 - Relevant anatomy and physiology
 - Principles of pre-procedural patient assessment and education
 - Monitoring guidelines and techniques
 - Intra-Procedure Guideline - required safety equipment and common complication recognition and treatment
 - Special situations and high-risk patients
4. [Pre-Procedure Evaluation Template](#) This template identifies key features of patient evaluation that should be performed prior to beginning a procedure that requires moderate sedation. Facilities may use this as a guide for creating CPRS templates.
5. [Moderate Sedation Study Aid](#) This colorful graphic summary includes key elements of moderate sedation practice, including many of the topics from the curriculum guide. This 8.5- by 11-inch front and back reference guide may be posted for practitioners in all sites where moderate sedation is administered.
6. [Moderate Sedation Cognitive Aid](#) Modeled after the NCPS Cognitive Aid for Anesthesiology, this colorful 8.5- by 11-inch front and back reference guide provides bulleted guidelines for managing common complications of moderate sedation (hypotension, hypertension, bradycardia, tachycardia, hypoxemia and agitation/difficult to sedate). Each complication is addressed in three parts: initial response; follow-up response; and things to consider. It is intended to be available to practitioners in all sites where moderate sedation is administered.
7. [Call for Help Card](#) This template identifies key resources for assistance. Facilities must customize this card for local use. The local version should be posted and CLEARLY VISIBLE in all sites where moderate sedation is administered.
8. [High-Fidelity Simulation Cases](#) Four cases are available for use in facilities that have the capability to conduct simulation training using a high-fidelity medical simulator. The cases demonstrate the common and important problems encountered during sedation practice.
 - Case 1: Orientation to Simulator and Training Sessions

<http://www.patientsafety.gov/pubs.html#sedate>

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Guide To Moderate Sedation / Analgesia By Non-Anesthesiologists						
Drug	Onset of action (Dose-dependent)	Duration of effect (Dose-dependent)	Initial Dose ADULTS	Initial Dose CHILDREN	Titration	Special instructions
Miscellaneous Agents						
Chloral Hydrate (Noctec)	PO: 30 - 60 minutes PR: 30 - 60 minutes	PO: 4 - 8 hours PR: 4 - 8 hours	PO: 500 - 1000 mg PR: 500 - 1000 mg	PO: 25-100 mg/kg (max: 1.5 gm/ dose)	25 - 50 % of the initial dose every 30 - 45 minutes prn.	Give 30-60 minutes prior to procedure. Can cause nausea, vomiting. Can premedicate with promethazine (12.5-25 mg). (Max. 2 gm/ day)
Diphenhydramine (Benadryl)	PO: 10 - 30 minutes IV: 1 - 10 minutes	PO: 4 - 6 hours IV: 2 - 6 hours	PO: 25 - 50 mg IV: 10 - 50 mg	PO: 1 mg/kg IV: 0.5 - 1 mg/kg (max: 50 mg / dose)	25 - 50 % of the initial dose every 15 - 30 minutes prn.	Only use as adjunct. Evidence as only agent for conscious sedation are limited. Can cause excitation in young children.
Droperidol (Inapsine)	IV: 5 - 10 minutes	IV: 2 - 4 hours	IV: 2.5 - 10 mg	IV: 0.05 - 0.1 mg/kg Not a first-line agent	25 - 50 % of the initial dose every 5 - 15 minutes prn.	All patients should undergo a 12-lead EKG to assess QT interval prior to procedure. Avoid if risks of arrhythmias. Antiemetic properties. Can cause extrapyramidal symptoms.
Ketamine (Ketalar)	PO: 15 - 30 minutes IV: 30 - 60 seconds	PO: 15 - 30 minutes IV: 5 - 15 minutes	PO: 5 - 10 mg/kg IV: 1 - 3 mg/kg	PO: 5 - 10 mg/kg IV: 0.5 - 1 mg/kg	25 - 50 % of the initial dose every 5 - 15 minutes prn.	Sedation / analgesia. Can cause emergence reactions, cardiovascular side effects, hypersalivation. Infuse over 1-2 min. Can be given IM.
Pentobarbital (Nembutal)	PO,PR: 30 minutes IV: 30 - 60 seconds	PO,PR: 1 - 4 hours IV: 15 - 30 minutes	PO,PR: 60 - 200 mg IV: 50 - 100 mg	PR,PO: 3 - 6 mg/kg IV: 1 - 3 mg/kg (max: 100 mg / dose)	25 - 50 % of the initial dose every 5 - 15 minutes prn.	Sedation-hypnotic effects, no analgesia. Administered IV over 2-5 minutes. Accumulation with repeated doses. Can be given IM.
<p>*** Droperidol *: -Should be used with extreme caution in patients with risk factors for prolonged QT syndrome (ie, CHF; bradycardia; cardiac hypertrophy; significant cardiac disease; diuretic use; hypokalemia; hypomagnesemia; concomitant use of antiarrhythmics, MAO inhibitor, erythromycin, haloperidol; age > 65 years; alcohol abuse. -Continuous EKG should be done prior to treatment and 2-3 hours after treatment to monitor arrhythmias.</p> <p>*** Ketamine: -Emergence reactions (hallucination, delirium) and cardiovascular side effects can be attenuated by administering midazolam or any other benzodiazepines prior to ketamine use. -Hypersalivation can be attenuated by administering atropine (0.01 mg/kg) or glycopyrrolate (0.005 mg/kg) prior to ketamine use. -Risk of respiratory depression if infused too rapidly. Infuse over 1-2 minutes. -Use with caution in patients with poorly controlled hypertension, congestive heart failure, angina or any other coronary artery diseases.</p> <p>*** Pentobarbital: -When given orally or rectally, pentobarbital should be given at least 30 minutes prior to performing a procedure. *** In obese patients, the dose should be calculated based on adjusted body weight.</p> <p>* See FDA Warning</p>						
Reversal Agents						
Flumazenil (Romazicon)	30-60 seconds	30-60 minutes	IV: 0.1 - 0.2 mg	(≤ 20kg): 0.01 mg/kg (≥ 20 kg): 0.2 mg/kg	May repeat after 1 minute IV prn.	Effective in reversing excessive sedation – not for respiratory depression. May wear off before benz. Infuse over 15 - 30 seconds.
Naloxone (Narcan)	IV: 1-2 minutes	IV: 45 minutes	IV: 0.2 - 0.4 mg	IV: 0.005 - 0.01 mg/kg	May repeat after 2-3 minutes IV prn.	May wear off before effects of opioids. Infuse total dose over 15 - 30 seconds. Only for use to reverse opioids. Can be given IM, SC.
<p>***** Complete monitoring is necessary for at least 90 minutes following the use of any reversal agents.</p> <p>***** Reversal agents should be used to reverse excessive sedation. (Note that flumazenil may not reverse hypotension or respiratory depression)</p> <p>***** Use flumazenil cautiously in patients on long term benzodiazepine therapy, history of seizures. May need to redose after 30 - 45 minutes.</p> <p>***** Careful monitoring should be continued after reversal is initiated.</p> <p>***** In obese patients, the dose should be calculated based on adjusted body weight.</p>						

Intra-operative Anesthesia Record 1004

■ Intra-operative Record must contain the following:

- Include name and hospital id number
- Name of practitioner who administer anesthesia
- Techniques used and patient position, including insertion of any intravascular or airway devices
- Name, dosage, route and time of drugs
- Name and amount of IV fluids

- Intra-operative Record must contain the following (continued):
 - Blood/blood products
 - Oxygenation and ventilation parameters
 - Time based documentation of continuous vital signs
 - Complications, adverse reactions, problems during anesthesia with symptom, VS, treatment rendered and response to treatment

[illegible]

Hilo Medical Center We Care for Our Community		PROCEDURE	
ANESTHESIA RECORD		SURGEON(S)	
ANESTHESIA PROVIDER(S)			
DATE:	OR #	N/GAUGE	SITE <input type="checkbox"/> R <input type="checkbox"/> L
ANESTHESIA TECHNIQUE:	GEN - REG - N Sed - LMAC	ASA PRIOR TO INDUCTION	1 2 3 4 5 6 E
START:	STOP:	INITIAL	PRE-MEDICATION & TIME:
<input type="checkbox"/> "TIME OUT" PERFORMED (Correct Patient, Correct Procedure, Correct Side/Site, Correct Position, Special Anesthesia Equipment)			
O ₂ U/M N ₂ O / Air U/M desflurane/sevoflurane %			TOTALS
IV Fluids			REGIONAL
EBL			<input type="checkbox"/> Spinal <input type="checkbox"/> Epidural
UCP			<input type="checkbox"/> Other
TIME			Position:
MONITORS & EQUIPMENT			Prep:
<input type="checkbox"/> NBP <input type="checkbox"/> R <input type="checkbox"/> L			Local:
<input type="checkbox"/> O ₂ /N ₂			Needle:
<input type="checkbox"/> Artery/Handheld			Drugs/Dose:
<input type="checkbox"/> Bink/Warner			Site:
<input type="checkbox"/> Upper/Lower			Attempts x:
<input type="checkbox"/> Hand/Warner			Level:
<input type="checkbox"/> O ₂ /NG			<input type="checkbox"/> Catheter:
<input type="checkbox"/> SpO ₂ /ESQ			Test Dose:
<input type="checkbox"/> TE Monitor			<input type="checkbox"/> See Remarks
SYMBOLS			PATIENT SAFETY
<input type="checkbox"/> Operation			<input type="checkbox"/> anesthesia machine
<input type="checkbox"/> NBP			# checked
<input type="checkbox"/> I.T. Artery/EP			ARMS
<input type="checkbox"/> RULSE			<input type="checkbox"/> padded
			<input type="checkbox"/> restraints
			<input type="checkbox"/> at side
			<input type="checkbox"/> NO less than 90°
			EYES
			<input type="checkbox"/> taped
			<input type="checkbox"/> lubed
			<input type="checkbox"/> padded
			<input type="checkbox"/> goggles
			RECOVERY
			AIRWAY
			<input type="checkbox"/> NP
			<input type="checkbox"/> O ₂ mask
			<input type="checkbox"/> Mask
			<input type="checkbox"/> Airway O/N
			<input type="checkbox"/> LMA
			<input type="checkbox"/> ETT/MTT
			# mmID
			<input type="checkbox"/> Endotracheal
			Location: PACU - CCU
			Time in:
			RA - NP - FM - LMA - ETT
			Awake - Responsive - Not Responsive
			BP: P: T:
			R: I:

ASA Document Anesthesia Care

STATEMENT ON DOCUMENTATION OF ANESTHESIA CARE

Committee of Origin: Quality Management and Departmental Administration
(Approved by the ASA House of Delegates on October 15, 2003, and amended on October 22, 2008)

Documentation is a factor in the provision of quality care and is the responsibility of an anesthesiologist. While anesthesia care is a continuum, it is usually viewed as consisting of preanesthesia, intraoperative/procedural anesthesia and postanesthesia components. Anesthesia care should be documented to reflect these components and to facilitate review.

The record should include documentation of:

I. Preanesthesia Evaluation*

A. Patient interview to assess:

1. Patient and procedure identification.
2. Verification of admission status (inpatient, outpatient, "short stay", etc.)
3. Medical history
4. Anesthetic history
5. Medication/Allergy history
6. NPO status

B. Appropriate physical examination, including vital signs and documentation of airway assessment.

C. Review of objective diagnostic data (e.g., laboratory, ECG, X-ray) and medical records.

D. Medical consultations when applicable.

E. Assignment of ASA physical status, including emergent status when applicable.

F. Formulation of the anesthetic plan and discussion of the risks and benefits of the plan

<http://asahq.org/For-Healthcare-Professionals/Standards-Guidelines-and-Statements.aspx>

Post-anesthesia Evaluation 1005

- Must have policies in place to ensure compliance with the post-anesthesia evaluation requirements
- Post-anesthesia evaluation must be done by some one who is qualified to give anesthesia
 - 5 who are qualified to give as previously mentioned
 - Can not delegate it to a RN, PA, or NP
- Must be done no later than 48 hours after the surgery or procedure requiring anesthesia services

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Post-anesthesia Evaluation 1005

- Must be completed as required by hospital policies and procedures
- Must be completed as required by any state specific laws
 - State law can be more stringent but not less stringent so if state wants to require it to be done in 24 instead of 48 hours you must comply
- P&Ps must be approved by the MS
- P&Ps must reflect current standards of care

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Post Anesthesia Evaluation 1005

- Document in chart within **48 hours** for patients receiving anesthesia services (general, regional, deep sedation, MAC)
- For inpatients and outpatients now
 - So may have to call some outpatients if not seen before they left the hospital
 - Note different for **CAH hospitals** under their manual under tag 322 (perform before patient leaves the hospital)
- Does not have to be done by the same person who administered the anesthesia

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Post Anesthesia Evaluation 1005

- Has to be done only by anesthesia person (CRNA, AA, anesthesiologist) or qualified doctor, dentist, podiatrist, or oral surgeon
- 48 hours starts at time patient moved into PACU or designated recovery area (SICU etc.)
- 48 hour is an outside parameter
- Individual risk factors may dictate that the evaluation be completed and documented sooner than 48 hours
 - This should be addressed by hospital P&P

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Post Anesthesia Evaluation 1005

- Evaluation can not generally be done at point of movement to the recovery area since patient not recovered from anesthesia
 - Patient must be sufficiently recovered so as to participate in the evaluation e.g. answer questions, perform simple tasks etc.

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Post Anesthesia Evaluation

- For same day surgeries may be done after discharge if allowed by P&P and state law
- If the patient is still intubated and in the ICU still need to do within the 48 hours
 - Would just document that the patient is unable to participate
 - If patient requires long acting anesthesia that would last beyond the 48 hours would just document this and note that full recovery from regional anesthesia has not occurred

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Post-Anesthesia Assessment to Include 1005

- Respiratory function with respiratory rate, airway patency and oxygen saturation
- CV function including pulse rate and BP
- Mental status, temperature
- Pain
- Nausea and vomiting
- Post-operative hydration
 - Consider having a form to capture these requirements

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Post-Anesthesia Survey Procedure

- Surveyor is review medical records for patients having anesthesia and make sure post-anesthesia evaluation is in the chart
- Surveyor to make sure done by practitioner who is qualified to give anesthesia
- Surveyor to make sure all postanesthesia evaluations are done within 48 hours
- Surveyor to make sure all the required elements are documented for the postanesthesia evaluation

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Post Anesthesia ASA Guidelines

- Patient evaluation on admission and discharge from the postanesthesia care unit
- A time-based record of vital signs and level of consciousness
- A time-based record of drugs administered, their dosage and route of administration
- Type and amounts of intravenous fluids administered, including blood and blood products
- Any unusual events including postanesthesia or post procedural complications
- Post-anesthesia visits

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STANDARDS FOR POSTANESTHESIA CARE

Committee of Origin: Standards and Practice Parameters

(Approved by the ASA House of Delegates on October 27, 2004, and last amended on October 21, 2009)

These standards apply to postanesthesia care in all locations. These standards may be exceeded based on the judgment of the responsible anesthesiologist. They are intended to encourage quality patient care, but cannot guarantee any specific patient outcome. They are subject to revision from time to time as warranted by the evolution of technology and practice.

STANDARD I

ALL PATIENTS WHO HAVE RECEIVED GENERAL ANESTHESIA, REGIONAL ANESTHESIA OR MONITORED ANESTHESIA CARE SHALL RECEIVE APPROPRIATE POSTANESTHESIA MANAGEMENT.¹

1. A Postanesthesia Care Unit (PACU) or an area which provides equivalent postanesthesia care (for example, a Surgical Intensive Care Unit) shall be available to receive patients after anesthesia care. All patients who receive anesthesia care shall be admitted to the PACU or its equivalent **except** by specific order of the anesthesiologist responsible for the patient's care.
2. The medical aspects of care in the PACU (or equivalent area) shall be governed by policies and procedures which have been reviewed and approved by the Department of Anesthesiology.
3. The design, equipment and staffing of the PACU shall meet requirements of the facility's accrediting and licensing bodies.

STANDARD II

A PATIENT TRANSPORTED TO THE PACU SHALL BE ACCOMPANIED BY A MEMBER OF THE ANESTHESIA CARE TEAM WHO IS KNOWLEDGEABLE ABOUT THE PATIENT'S CONDITION. THE PATIENT SHALL BE CONTINUALLY EVALUATED AND TREATED DURING TRANSPORT WITH MONITORING AND SUPPORT APPROPRIATE TO THE PATIENT'S CONDITION.

STANDARD III

UPON ARRIVAL IN THE PACU, THE PATIENT SHALL BE RE-EVALUATED AND A VERBAL REPORT PROVIDED TO THE RESPONSIBLE PACU NURSE BY THE MEMBER

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ASA Standard Post-anesthesia Care

STANDARDS FOR POSTANESTHESIA CARE

Committee of Origin: Standards and Practice Parameters

(Approved by the ASA House of Delegates on October 27, 2004, and last amended on October 21, 2009)

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<http://asahq.org/For-Healthcare-Professionals/Standards-Guidelines-and-Statements.aspx>

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ASA Practice Guideline Postanesthesia Care

SPECIAL ARTICLE

<http://asahq.org/For-Members/Practice-Management/Practice-Parameters.aspx>

Anesthesiology 2002; 96:742-52

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Practice Guidelines for Postanesthetic Care

A Report by the American Society of Anesthesiologists Task Force on Postanesthetic Care

PRACTICE guidelines are systematically developed recommendations that assist the practitioner and patient in making decisions about health care. These recommendations may be adopted, modified, or rejected according to clinical needs and constraints.

Practice guidelines are not intended as standards or absolute requirements. The use of practice guidelines cannot guarantee any specific outcome. Practice guidelines are subject to periodic revision as warranted by the evolution of medical knowledge, technology, and practice. The Guidelines provide basic recommendations that are supported by analysis of the current literature and by a synthesis of expert opinion, open forum commentary, and clinical feasibility data (Appendix).

A. Definition of Postanesthetic Care

The literature does not provide a standard definition for postanesthetic care. For these Practice Guidelines, postanesthetic care refers to those activities undertaken to manage the patient following completion of a surgical procedure and the concomitant primary anesthetic.

anesthesia or sedation and analgesia care. This is accomplished by evaluating available evidence and providing recommendations for patient assessment, monitoring, and management with the goal of optimizing patient safety. It is expected that each recommendation will be individualized according to the needs of each patient.

C. Focus


These Guidelines focus on the perioperative management of patients with the goal of improving postanesthetic quality of life, reducing postoperative adverse events, providing a uniform assessment of recovery, and streamlining postoperative care and discharge criteria.

These Guidelines apply to patients of all ages who have just received general anesthesia, regional anesthesia, or moderate or deep sedation. The Guidelines may need to be modified to meet the needs of certain patient populations, such as children or the elderly. The Guidelines do not apply to patients receiving infiltration local anesthesia without sedation, patients receiving minimal sedation (anxiolysis),¹ or patients receiving intensive care.

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AANA Post-anesthesia Care Standards

Postanesthesia Care Standards for the Certified Registered Nurse Anesthetist

www.aana.com/resources2/professionalpractice/Pages/Postanesthesia-Care-Standards.aspx  [Printer Friendly Version](#)

Standard VII of AANA Scope and Standards for Nurse Anesthesia Practice:

Evaluate the patient's status and determine when it is safe to transfer the responsibility of care. Accurately report the patient's condition, including all essential information, and transfer the responsibility of care to another qualified healthcare provider in a manner that assures continuity of care and patient safety.

Standard VII is not specific to postanesthesia care, but includes all transfers of the responsibility of care for the patient from the CRNA to another qualified healthcare provider. For example, transfers of the responsibility of care may occur when the CRNA transfers care to another anesthesia professional during the provision of anesthesia care or when the CRNA transfers care to another qualified healthcare provider for postanesthesia recovery. During all transfers of care, the CRNA is responsible for first determining that it is safe to transfer the responsibility of care of the patient to another qualified healthcare provider and to accurately report all essential information to the qualified healthcare provider who accepts responsibility for the patient's care.

That said, the AANA believes that the postanesthesia period is an extension of the anesthesia process and warrants additional consideration. The anesthesia professional's responsibility to the patient extends through this period. Regardless of the practice setting, this responsibility includes a thorough knowledge of the patient's needs, the communication of those needs to qualified providers, and the assurance that the postanesthesia care will be consistent with the patient's needs.

Anesthesia services are being performed in increasingly diverse settings as medical care services expand and change. These standards shall apply to all settings where postanesthesia care is rendered.

The anesthesia professional, with specialized knowledge and skills, has a primary role in overseeing postanesthesia

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CAH Hospitals

- Anesthesia standard starts at tag C-0322 and see 323
 - Most of the sections are the same
- The PPS hospital anesthesia standards provide more detailed information on how this section will be surveyed
 - Will cover the differences for CAH hospitals
- Much shorter section
 - Does not mention CRNA going to OB unit to put in epidural but most likely is treated the same

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Anesthesia Standard CAH

C-0322

§485.639(b) Standard: Anesthetic Risk and Evaluation

- (1) A qualified practitioner, as specified in paragraph (a) of this section, must examine the patient immediately before surgery to evaluate the risk of the procedure to be performed.
- (2) A qualified practitioner, as specified in paragraph (c) of this section, must examine each patient before surgery to evaluate the risk of anesthesia.
- (3) Before discharge from the CAH, each patient must be evaluated for proper anesthesia recovery by a qualified practitioner, as specified in paragraph (c) of this section.

Interpretive Guidelines §485.639(b)

The pre-anesthesia evaluation must be performed prior to inpatient or outpatient surgery. The pre-anesthesia evaluation must be performed by an individual qualified to administer anesthesia. The pre-operative anesthetic evaluation should include:

- Notation of anesthesia risk

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CAH Pre-anesthesia Assessment C-322

- Must be done by qualified practitioner
 - Example would include CRNA and anesthesiologist
- Includes what must be in the preanesthesia assessment
 - Notation of anesthesia risk
 - Anesthesia, drug and allergy history
 - Any potential anesthesia problems identified
 - Patient's condition prior to induction of anesthesia

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Post Anesthesia Assessment CAH 322

- Cardiopulmonary status
- Level of consciousness
- Any follow-up care and/or observations and
- Any complications occurring during post-anesthesia recovery
- States that the post-anesthesia follow up report must be written **prior** to discharge from anesthesia services
 - This is different for other hospitals that have 48 hours

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The End ! Questions??



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