

### **CMS CfC: Infection Control**

### 416.51 CfC: Infection Control

The ASC must maintain an infection control <u>program</u> that seeks to minimize infections and communicable disease.

### **Interpretive Guideline:**

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It should be comprehensive and effective

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### **Infection Control Program**

CMS CfC require that the program includes:

- Be ongoing;
- Include actions to prevent, identify, and manage infections and communicable diseases; and
- Includes a mechanism to immediately implement corrective actions and preventative measures that improve the control of infection within the ASC.

### **CMS CFC: Infection Control**

### 416.51(b) Standard: Infection Control Program

The ASC must maintain an ongoing program designed to prevent, control, and investigate infections and communicable disease.

(3) Responsible for providing a plan of action for preventing, identifying, and managing infections and communicable diseases and for implementing immediately corrective and preventative measures that result in improvement.

### **Infection Control Plan of Action**

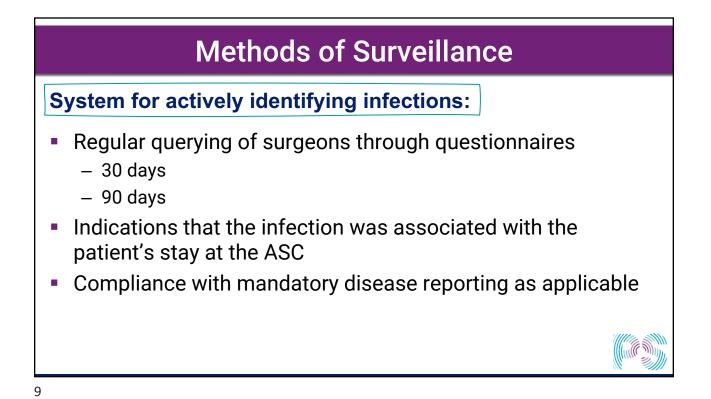
### This Plan should include:

- Maintenance of a sanitary environment
- Develop and implement infection control measures
- Mitigate risk associated with patient infections present upon admission
- Mitigate risks contributing to HAI
- Active surveillance

### **Infection Control Plan of Action**

### This Plan should include:

- Monitor compliance with P&Ps, protocols
- Plan evaluation and revision of plan as indicated
- Coordination as required by law with federal, state and local emergency preparedness and health authorities to address communicable and infectious disease threats and outbreaks
- Compliance with reportable disease requirement of the local and State health authority



Methods of Surveillance

System for actively identifying infections:

- Regular compliance surveillance of facility and staff
  - Infection Control Surveyor Worksheet
  - Audit/Surveillance Tools
  - Audit documentation of infection tracking-logs and questionnaires

### **NHSN Surveillance**

- Proactive surveillance vs. state reporting requirements
- Surveillance and investigations of SSI is proven to help reduce further SSIs
- Required reporting only includes certain procedures and must meet NHSN definitions
- Breast surgery has a different set of definitions for SSI
- Sample toolkit is provided in the NHSN OPC-SSI surveillance

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### NHSN Definitions | Superficial Incisional SSI

- Occurs within 30 days
- Involves skin and sub-Q tissue of the incision
- AND one of the following:
  - Purulent drainage
  - Positive culture
  - Incision deliberately opened by surgeon and symptomatic
    - · pain, tenderness, swelling, erythema or heat
  - Diagnosis of superficial SSI by physician

### NHSN Definitions | Deep Incisional SSI

- Occur within 30-90 days of surgery
- AND Involves deep soft tissue (fascial/muscle layers)
- AND one of the following:
  - Purulent drainage
  - Deep incision that spontaneously dehisces or is opened and culture positive and symptomatic
    - pain, fever, redness
  - An abscess or other evidence of infection involving the deep incision

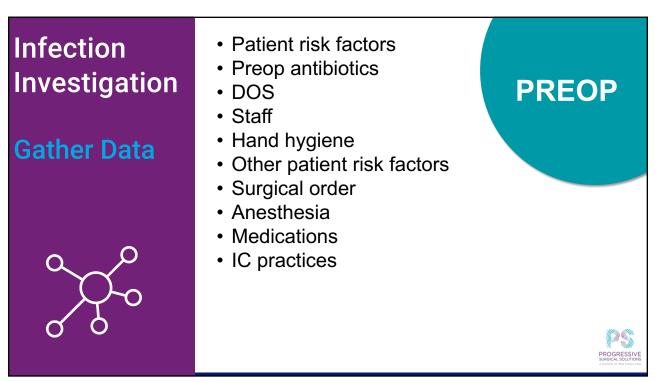
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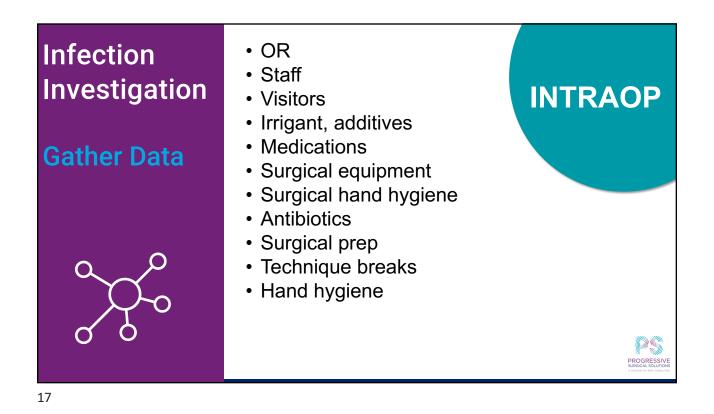
### NHSN Definitions | Organ/Space SSI

- Occurs within 30-90 days
- AND Infection involves deeper than fascia/muscle layers
- AND one of the following:
  - Purulent drainage from a drain that is placed in the organ space
  - Culture positive
  - An abscess or other evidence of infection involving the organ space









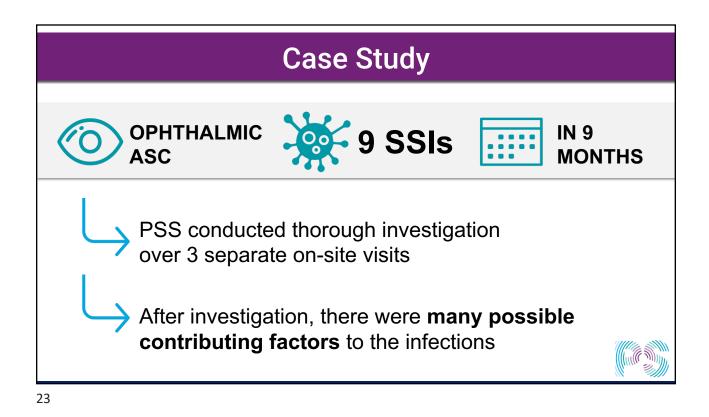
Infection Investigation Gather Data	<ul> <li>Sterilizer</li> <li>IUSS</li> <li>Reusable equipment</li> <li>Staff</li> <li>Decontamination process</li> <li>Instrument tray, use of the d</li> <li>Process monitors BIs, chemindicators, bowie-dick</li> </ul>	
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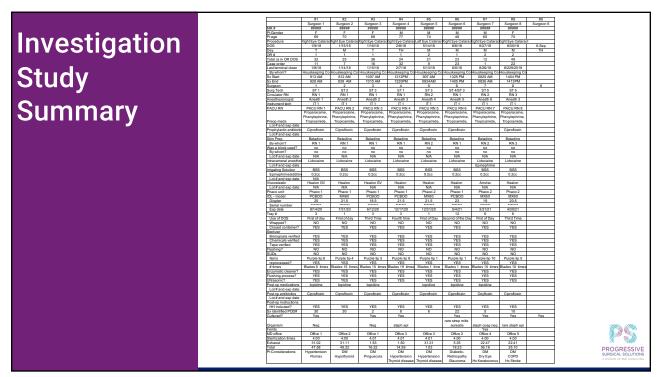


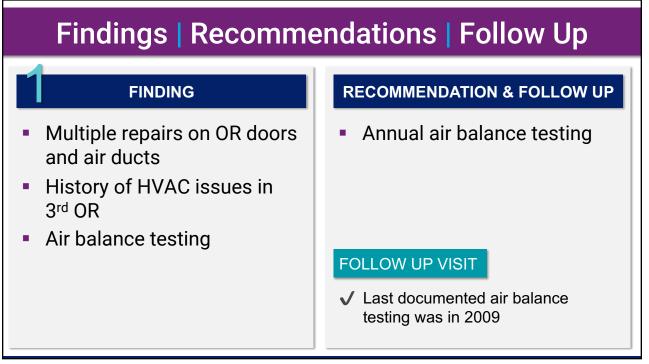
Infection	<ul> <li>Trends</li> </ul>	
Investigation	Human factors	
	Process factors	
Analysis	Equipment issues	
	Controllable factors/issues	
	Uncontrollable factors/issues	
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		PROGRESSIVE SURGICAL SOLUTIONS A DIVISION OF BEM CONSULTING

Infection Investigation	<ul> <li>For each factor/issue:</li> <li>– Opportunity for improvement</li> <li>– Plan for prevention or recurrence</li> </ul>	
Action Plan	<ul> <li>System changes to reduce the likelihood of human error</li> <li>Re-evaluation</li> </ul>	
	PROGRESSIVE SINGLAL SOLUTIONS A SUBJECT OF DE CONLINE	

Infection Investigation	<ul><li>QAPI Committee, Governing Body</li><li>Per State specific requirements</li></ul>	
Reporting		







## Findings | Recommendations | Follow Up

### FINDING

- Only 1 prevac sterilizer to service 3 ORs
- Chronic operational issues
- Multiple onsite repairs

### **RECOMMENDATION & FOLLOW UP**

- Reliability of sterilizer during months with infections
- Additional sterilizer installed
- Old sterilizer rebuilt

#### FOLLOW UP VISIT

- ✓ Quarterly PM
- Continued performance issues

### FINDING

- Tap water used for decontamination
- New washer sterilizer purchased but not in use
- "Critical Water"

#### **RECOMMENDATION & FOLLOW UP**

- "Critical Water" must be used
- Sterilizer specifications for functioning properly
- RO system in Soiled Utility

#### FOLLOW UP VISIT

- ✓ Soft water confirmed going to sterilizer
- ✓ Washer has water treatment system
- ✓ Tap water still used for decontamination

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### Findings | Recommendations | Follow Up

### FINDING

- New closed container system put into use without sufficient training
- Container systems not vented, which increased dry time
- Took time to determine required sterilization cycle time
- Moisture noticed at the bottom of the trays by SPD staff

### **RECOMMENDATION & FOLLOW UP**

- Vented containers vs. nonvented
- QI study to evaluate appropriate cycle time

#### FOLLOW UP VISIT

- ✓ No new vented containers
- ✓ Total cycle time determined
- More instruments instead of different containers

### FINDING

- Staffing of techs for SPD and ORs
- 1 dedicated to instrument processing
- Surgical techs in OR assist in SPD, but are not adequately inserviced

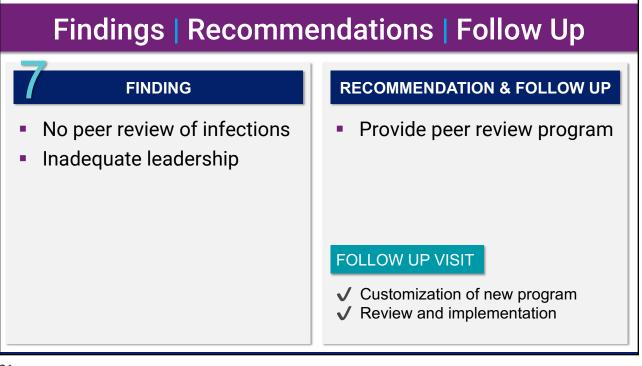
#### **RECOMMENDATION & FOLLOW UP**

- SPD should be staffed with two techs
- Cross-training of tech staff

#### FOLLOW UP VISIT

✓ Second SPD tech hired
 ✓ Some cross-training





Findings   Recommendations   Follow Up			
FINDING	<b>RECOMMENDATION &amp; FOLLOW UP</b>		
<ul> <li>Construction in third OR</li> <li>IC plan supposedly submitted to the State</li> </ul>	<ul> <li>Construction may not be a factor</li> <li>Need to track down IC plan submitted to the State</li> </ul>		
	<ul> <li>FOLLOW UP VISIT</li> <li>✓ IC plan found and confirmed submittal to State</li> <li>✓ No evidence specific procedures were followed during construction</li> </ul>		

### FINDING

- Always room for improvement for hand hygiene
- Lack of ABHR dispensers
- Manufacturer's IFUs for surgical hand antisepsis

#### **RECOMMENDATION & FOLLOW UP**

- Install additional ABHR dispensers
- Inservice staff on manufacturer IFUs for surgical hand antisepsis
- Ongoing monitoring and surveillance

#### FOLLOW UP VISIT

- ✓ No additional ABHR dispenser installed
- $\checkmark$ Needs more reinforcement of proper hand hygiene

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#### Findings | Recommendations | Follow Up **RECOMMENDATION & FOLLOW UP** FINDING Surgical prep needs to be Discontinue use of betadine reevaluated swabs Person performing prep, Implement new prep kit and routinely wipes prep off inservice staff FOLLOW UP VISIT ✓ Integrate surgical prep into back table pack Need to standardize and inservice 34

### FINDING

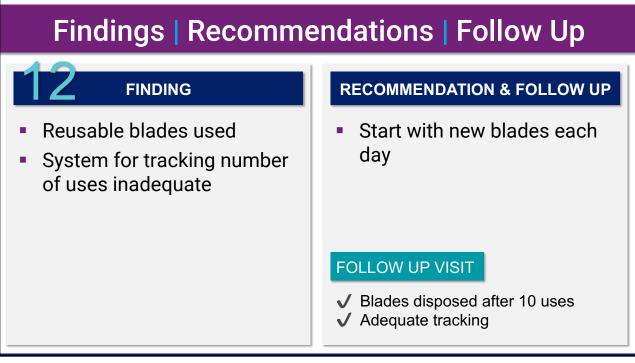
- OR door left open
- Unable to maintain environmental standards

### **RECOMMENDATION & FOLLOW UP**

- OR door must be kept closed
- OR traffic should be kept to a minimum

#### FOLLOW UP VISIT

✓ OR doors remain open at inappropriate times



### FINDING

- Lack of effective and competent leadership
- No proper response to reported infections
- Facility program is substandard
- Quality program is imperative

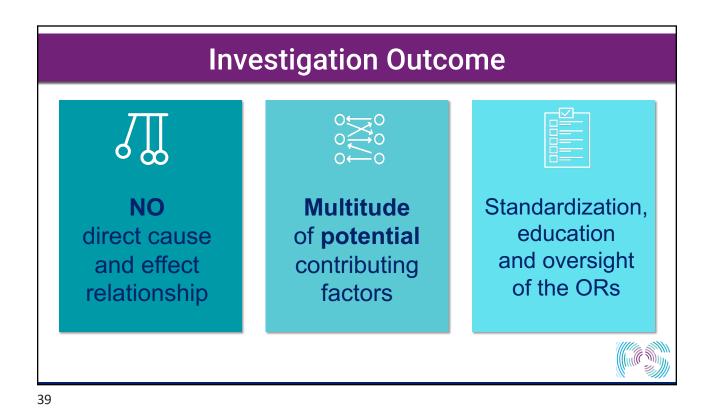
### **RECOMMENDATION & FOLLOW UP**

- Provide new facility program
- Orient facility leadership and work on implementation

#### FOLLOW UP VISIT

- ✓ Continue to work on new program
- ✓ Review and implementation

Findings   Recommendations   Follow Up				
14 FINDING	<b>RECOMMENDATION &amp; FOLLOW UP</b>			
<ul> <li>Mismanagement resulted in anxiety and insecurity of staff</li> <li>Counterproductive to a culture of safety</li> </ul>	<ul><li>Opportunity to embrace culture of safety</li><li>Review best practices</li></ul>			
	<ul> <li>FOLLOW UP VISIT</li> <li>✓ Nothing done</li> <li>✓ New Administrator hired</li> </ul>			



### Conclusions

- ✓ Ongoing surveillance
- Thorough investigation
- Peer review
- Internal and external reporting
- Investigations may build on each other

### References

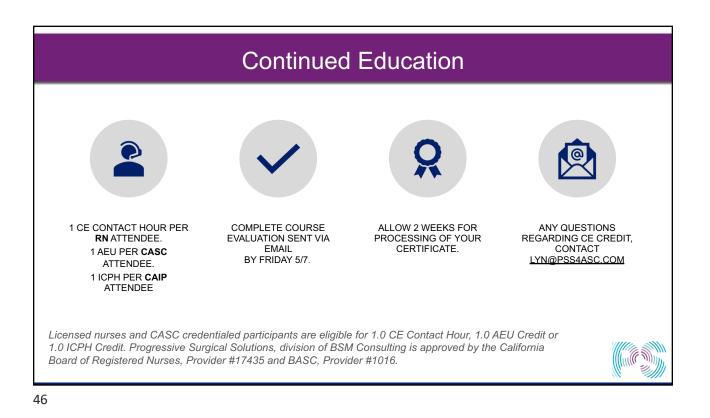
- National Healthcare Safety Network. (2021, January). Outpatient Procedure Component Surgical Site Infection (OPC-SSI) Surveillance. Retrieved from <u>https://www.cdc.gov/nhsn/pdfs/opc/opc-ssi-protocol-current-508.pdf</u>
- Centers for Medicare and Medicaid Services. (rev 2020, February 20). State Operations Manual Appendix L – Guidance for Surveyors: Ambulatory Surgery Centers. Retrieved from <a href="https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap\_Lambulatory.pdf">https://www.cms.gov/Regulationsand-Guidance/Guidance/Manuals/downloads/som107ap\_Lambulatory.pdf</a>



#### Available on **Operations/Infection Control/Infection Prevention** & Investigation eSupport HOME ESUPPORT. BLOG. FORUM ACCOUNT. PROGRESSIVE SURGICAL SOLUTIONS INFECTION CONTROL: INFECTION PREVENTION & INVESTIGATION INFECTION CONTROL Overview SURGICAL SITE INFECTION (SSI) Infection Prev Investigation The following resources help healthcare facilities prevent and control the incidence of surgical site infections. Part of CDC's work is the development and dissemination of public health guidance based on the best available information. CDC is committed to reviewing and updating their Guidelines Library (link below) to ensure that they provide up-to-date, practical, and effective public health recommendations. Infection Control Resources Immunizations and Vaccines CDC: Surgical Site Infection Guidelines Hand Hygiene Environmental Sanitation CDC: Infection Control Guidelines Library Instrument Decontamination and Sterilization CDC: SSI FAQ | Patient Info The CDC's National Healthcare Safety Network (NHSN) has definitions and reporting instructions for Surgical Site Infection (SD) Surveillance. There are some states that mandate SSI reporting to NHSN including. Colorado. Massachusetts, Nevada, New Hampshire, New Jersey and Texas. Click here for Surveillance for SSI Events – Resources for NHSN users. Medication Practices Infection Control Coordinator CDC National Healthcare Safety Network (NHSN) PROGRESSIVE SURGICAL CDC: NHSN Surveillance for Surgical Site Infection (SSI) Events - Resources for enrolled users The Joint Commission's Implementation Guide for NPSG.07.05.01 on Surgical Site Infections (link below) will provide guidance to health care organizations implementing the National Patient Safety Goal (NPSG) on surgical site infections (SSIs). eSupport The Joint Comm mentation Guide for NPSG.07.05.01 on Surgical Site Infections: The SSI Change Today put out a special report, SSI Prevention: Back to Basics, that summarizes the basics surgical site infection (SSI) prevention and control, including reviewing the burden of SSIs, risk factors and risk management, components of SSI prevention, plus current recommendations from clinical guidelines. Infection Control Today: Getting Back to Basics in the OR Through Evi



### Available on **Operations/Infection Control/Infection Prevention** & Investigation eSupport LICK LINKS BELOW TO DOWNLOAD CDC/NHSN Surgical Site Infection (SSI) Event 2021 I National Healthcare Safety Network (NHSN) Surgical Site Infection (SSI) Surveillance Preoperative Skin Cleansing Focused on Patient Compliance Postop Infection Investigation Summary Postop Infection Investigation Summary: RETINA Postop Infection Investigation Summary: TASS Patient FAQ: Surgical Site Infections Patient Infographic: Preventing Surgical Site Infections PROGRESSIVE SURGICAL upport









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June 18	60 min	RN, CASC	Life Safety Risk Assessment   What is it and What is Required	John Crowder, Jr.
July 26	20 min		How to Make a Performance Appraisal Effective	Regina Boore
August 27	60 min	RN, CASC	Problem Employees   How to Manage, How to Win	Abtin Mehdizadegan
September 27	20 min		Customer Service in the ASC   Enhancing the Patient Experience	Laurie Brown
October 29	60 min	RN, CASC	Credentialing Review	Crissy Benze
November 29	20 min		Annual Survey Watch Report	Vanessa Sindell
December 17	60 min		TBD	

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