

SOCIETY FOR SAMBA
AMBULATORY ANESTHESIA
Outpatient • Office Based • Non-Operating Room

ASC Medical Directors & Leaders Virtual Summit
Saturday, January 22, 2022



Tess Poland, RN

Compliance

CMS and Accreditation Updates



Cheryl Pistone, RN

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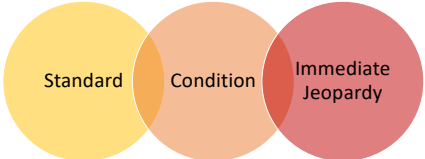
Learning Objectives

- Understand CMS compliance levels and impact of non-compliance
- Identify the top two deficiencies related to anesthesia in the ambulatory surgery setting
- Introduce recent Interim Final Rule for Conditions for Coverage

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Definitions

Standard level deficiency
Condition level deficiency
Immediate Jeopardy

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Standard vs. Condition Level Findings

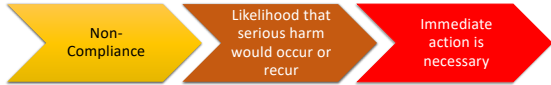
Standard	Condition
• Example: § 416.44(a) Standard: Physical Environment • Submit Plan of Correction (PoC) and submit within 10 calendar days • Implement corrective actions within 30 days	• Example: § 416.44 Condition for Coverage - Environment • Submit PoC and submit within 10 calendar days • Implement corrective actions within 30 days • If CCN = Yes: Undergo Medicare Follow-Up (MFU) survey within 45 days • If not corrected, undergo second MFU • If not corrected at 2nd MFU, non-accreditation • If CCN = No: Non-Accreditation and recommendation for non-certification

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Key Components of an Immediate Jeopardy



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Top Immediate Jeopardy Deficiencies Related to Anesthesia

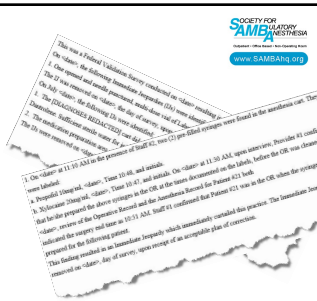
Safe Injection Practice
Emergency Equipment

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Safe Injection Practice

- Pre-filled syringes on anesthesia cart in procedure room
 - Prepared before OR was cleaned
 - Patient in room when syringes prepared for following patient
- Multidose vial opened and needle punctured in procedure room



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Safe Injection Practice

- Cross contamination
- Cross infection
- Risk of medication errors
- Risk of liability
- Impacts patient outcomes



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Emergency Equipment

- Non-functioning laryngoscope handle and blade
- No battery backup
- No backup laryngoscope
- No testing
- Lack of staff training and knowledge on use of equipment

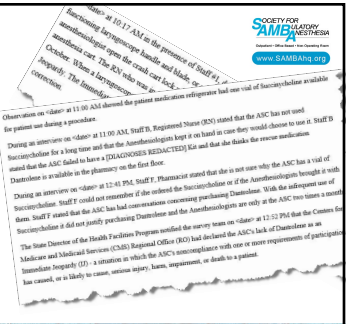


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Perfect Storm

- Resuscitative drugs present
- Staff unaware
- Pharmacist unaware
- Rescue kit/drugs not available
- Drills not conducted



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CMS Update: Interim Final Rule

Vaccination Regulation: Enforcement of Rule Imposing Vaccine Requirement for Health Care Staff in Medicare- and Medicaid-certified Providers and Suppliers
QSO-22-07-ALL

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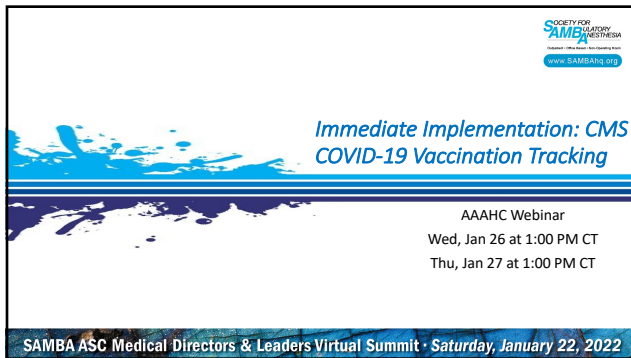
416.51 Condition for coverage— Infection control

(c) Standard: COVID-19 vaccination of staff

- Effective: Immediately
- Implementation Jan 27
- Implementation Feb 13: AL, AK, AZ, AR, GA, ID, IN, IA, KS, KY, LA, MS, MO, MN, NE, NH, ND, OH, OK, SC, SD, TX, UT, WV, WY
- Exclusion: TX
- Overview
 - Policy requirements
 - Vaccination requirements
 - Tracking and documentation
- Evaluating Compliance
 - Standard
 - Condition
 - Immediate Jeopardy

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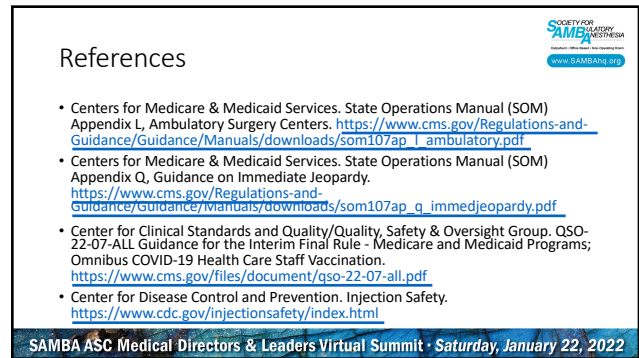

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Immediate Implementation: CMS COVID-19 Vaccination Tracking

AAAHC Webinar
 Wed, Jan 26 at 1:00 PM CT
 Thu, Jan 27 at 1:00 PM CT

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References

- Centers for Medicare & Medicaid Services. State Operations Manual (SOM) Appendix L, Ambulatory Surgery Centers. https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_l_ambulatory.pdf
- Centers for Medicare & Medicaid Services. State Operations Manual (SOM) Appendix Q, Guidance on Immediate Jeopardy. https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_q_immedjeopardy.pdf
- Center for Clinical Standards and Quality/Quality, Safety & Oversight Group. QSO-22-07-ALL Guidance for the Interim Final Rule - Medicare and Medicaid Programs; Omnibus COVID-19 Health Care Staff Vaccination. <https://www.cms.gov/files/document/qso-22-07-all.pdf>
- Center for Disease Control and Prevention. Injection Safety. <https://www.cdc.gov/injectionsafety/index.html>

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Q&A

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