

**Does Your Infection Control Program
Measure Up?
Easy Steps to Achieving Medicare
Compliance**

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INTRODUCTION

Medicare Conditions for Coverage

§416.51 Conditions for coverage – Infection Control

The ASC must maintain an infection control program that seeks to minimize infections and communicable diseases.

- (a) Standard: Sanitary environment. The ASC must provide a functional and sanitary environment for the provision of surgical services by adhering to professionally acceptable standards of practice.

- (b) Standard: Infection control program. The ASC must maintain an ongoing program designed to prevent, control, and investigate infections and communicable diseases. In addition, the infection control and prevention program must include documentation that the ASC has considered, selected, and implemented nationally recognized infection control guidelines.

INTRODUCTION

Medicare Conditions for Coverage

§416.51 Conditions for coverage – Infection Control

(b) The program is:

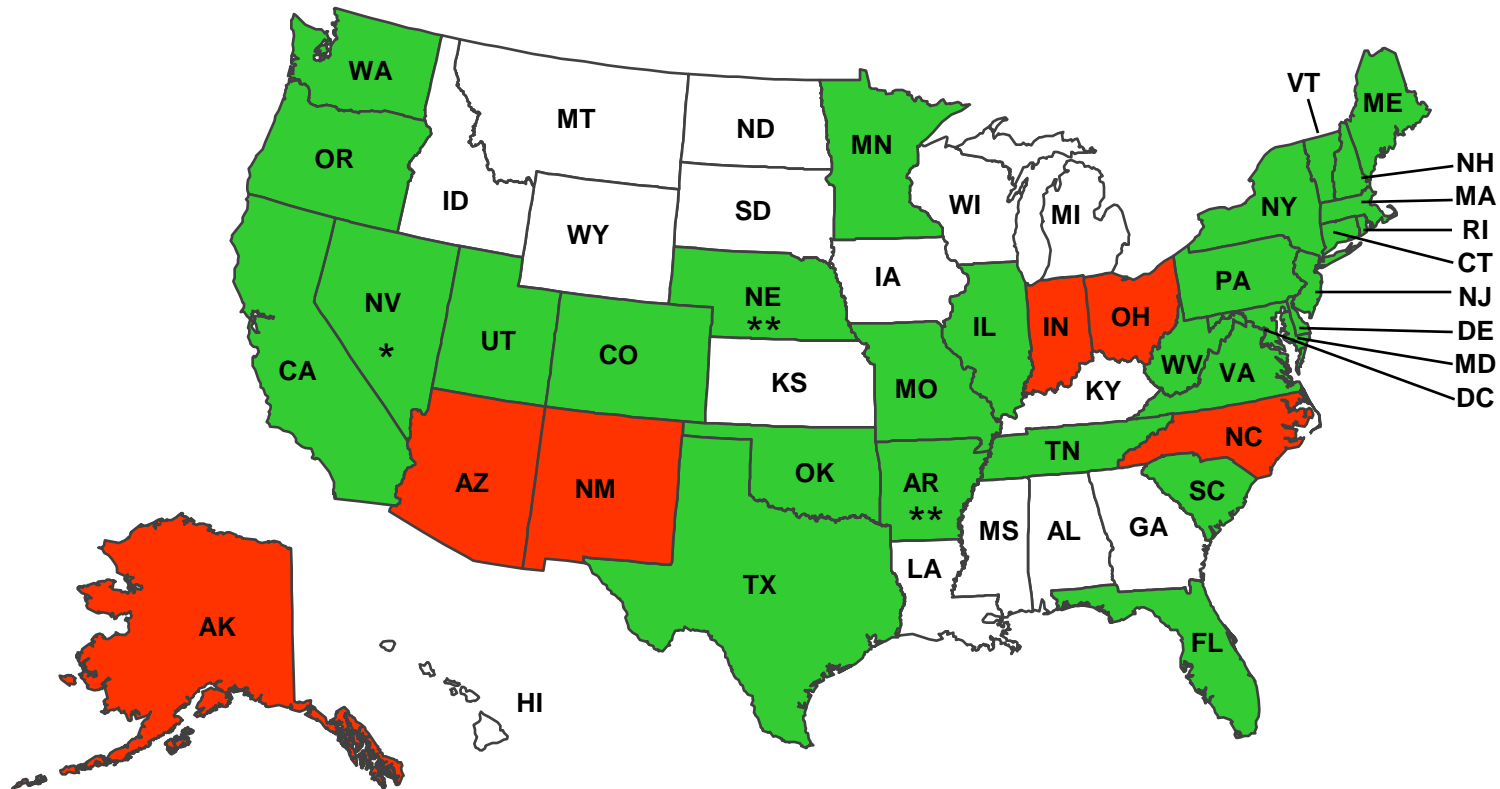
- (1) Under the direction of a designated and qualified professional who has training in infection control;
- (2) An integral part of the ASC's quality assessment and performance improvement program; and
- (3) Responsible for providing a plan of action for preventing, identifying, and managing infections and communicable diseases and for immediately implementing corrective and preventive measures that result in improvement.





Infection Control Plan: Creating a Plan for Your Center

§416.51 (b)

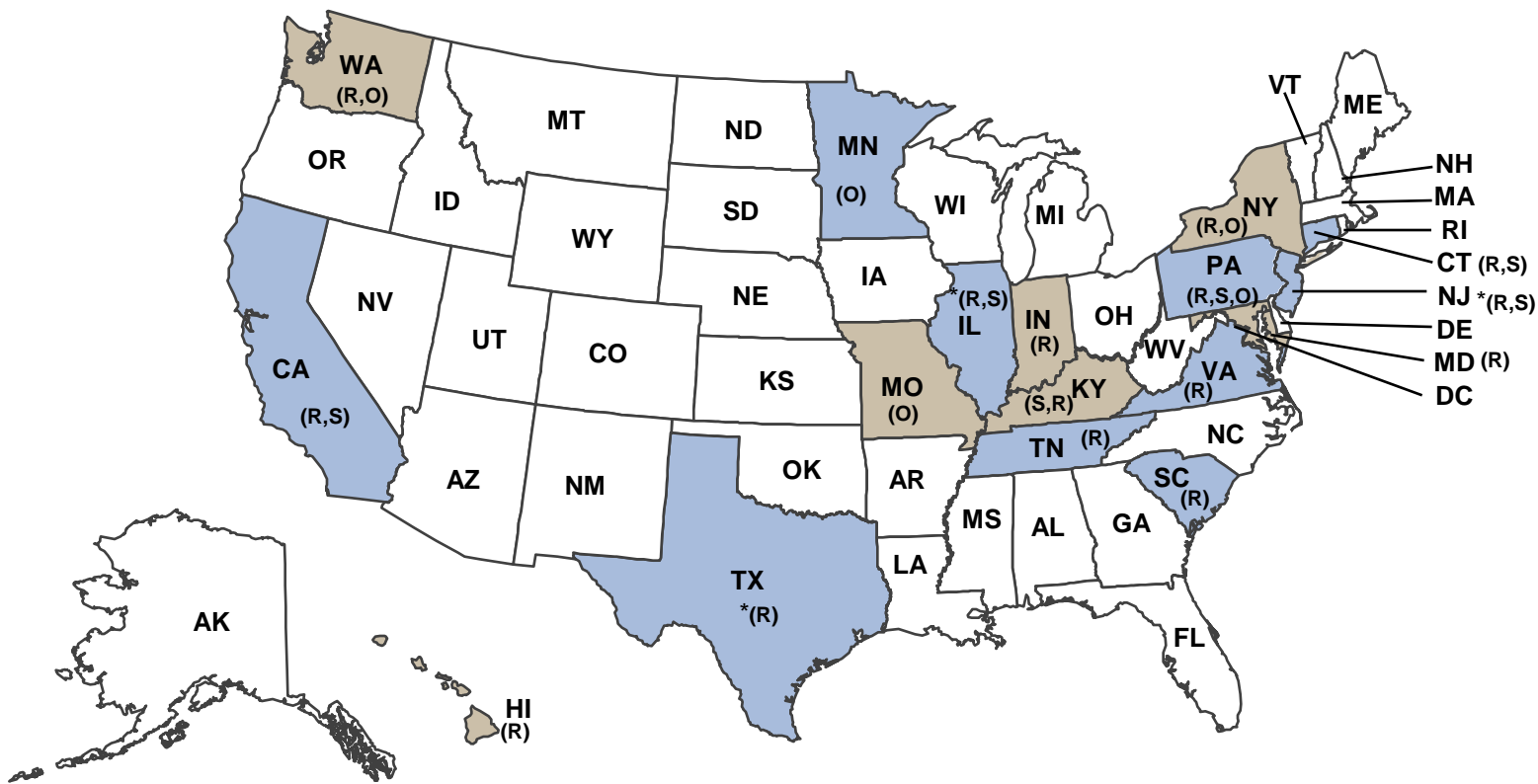
- Regardless of Size or Service
- Systematic, Coordinated and Continuous Approach
 - Systematic=Organized
 - Coordinated=Working Together
 - Continuous=Ongoing
- Includes Surveillance, Prevention and Control
- Risks Identified
 - Population served
 - Facility location
 - Community
- State, Federal, Accreditation Standards and Guidelines

Healthcare-Associated Reporting Laws and Regulations



-  States with study laws
-  Mandates public reporting of infection rates
-  Mandates reporting only to state government
-  Voluntary

MRSA Laws & Pending Legislation - 2009



- Enacted MRSA Law
- Pending MRSA Legislation
- Enacted MRSA Law & Pending MRSA Legislation
- Legislature Adjourned Without Enactment

- R** – Reporting Laws or Bills
- S** – Screening Laws or Bills
- O** – Other Laws or Bills (e.g., studies, pilots, other infection control requirements)

Infection Control Plan: Leadership Role and Commitment

§416.51

- Developed by Facility Leadership
- Leadership Commitment
- Endorsing and Participating in **All** Efforts to Control Infection
- Resources and Encourage Improvement
- Infection Control Plan approved by MEC/GB

Organizational Structure

§416.51

Facility Governing Body

Medical Executive Committee

Responsibilities

- Credentialing
- Peer Review
- Infection Control**
- Blood & Surgical Review
- Quality Management
- Risk Management
- Medical Records
- Utilization of Services

Quality Council

Responsibilities

- Occurrence Reporting
- Infection Control**
- Radiology Audits
- Pharmacy Audits
- Pathology Review
- Safety Management
- Patient Safety
- Medical Record Review
- Patient Satisfaction Surveys

Continuing Education

- Fax request to 703.836.2090
- Include course code #12409
- Include whether you want CEUs (Nursing or Coding) or AEU's
- For Nursing CEUs you must include RN License number

For this webinar we are able to offer Nursing and Coding CEUs and CASC AEU's only.

Infection Control Plan: Development and Activities

§416.51(b), (b1), (b2) and (b3)

- Infection Control Nurse Approved by GB
- Lead Staff Programs Objectives and Goals
- Ongoing and Annual Evaluation
- Collaboration of Staff=Successful Program
- Audit Criteria

Infection Control: Planning Phase

Effective and Well Managed

§416.51

- Direction of a Qualified Professional
- Outside Consultant
- Community Leaders
- Documentation of Training and Knowledge
- Perform Risk Assessments
- Investigations and Build Activities
- Competency Assessment
- State Required Certification

Infection Control: Planning Phase

Other Qualified Staff

§416.51 (b1)

- Central Sterile Processor (Certified)
- Safety Officer (OSHA Training)
- Employee Health Nurse
- Documentation of Competencies and Job Descriptions

Infection Control Plan: Questions to Consider When Identifying Risks

§416.51 (b)

- What type of patients do we serve?
- What are the most common diagnoses?
- What are most frequently performed surgical or invasive procedures?
- What type of patients increase liability and/or costs for the center?
- What type of health concerns exist in the community?
- Which patients are increased risk for infection?

Infection Control Plan: Risks Identified

§416.51(b) and (b2) and (b3)

- Prioritize Risks Identified
- Target Resources
- Strategies Identified
- Goals Identified
- Improve Patient Safety and Quality of Care

Infection Control: Planning Phase Guidelines to Consider

§416.51 (a) and (b)

- CDC Guidelines
- OSHA
- AORN Standards
- ASPAN Standards
- AAMI Standards
- Accreditation Standards
- 2009 National Patient Safety Goal #7

Infection Control: Planning Phase

Organizations and Education

§416.51 (b1)

- APIC
- AORN
- ASPAN
- AAMI
- IAHCSSMM
- CBSPD
- Facility Wide
- Orientation and Annual Training
 - Documentation of all Training
- Patient and Family Education

Infection Control: Implementation Phase Infection Prevention & Control Activities

§416.51 (a), (b2) and (b3)

- **Policies and Procedures**
- **Employee Health**
 - **Coordination between departments**
 - **Medical Evaluation**
 - **Health and Safety Education**
 - **Immunization Programs**
 - **Management of job related exposures**
 - **Policies for work restrictions**
 - **Counseling services**
 - **Employee Health Record Confidentiality**
- **Admission Assessment**
 - **Pre-admission Screening**
 - **MRSA**
 - **TB**
 - **Respiratory illness**

Infection Control: Implementation Phase Infection Prevention & Control Activities

§416.51 (a) and (b)

- Standards of Practice
 - HAND HYGIENE
 - Standard Precautions/Transmission-Based Precautions
 - Aseptic Technique
 - Handling Sterile Supplies
 - Gowning and Gloving
 - Scrub Attire
 - Draping
 - Sterilization Protocol
 - Event Related Sterility
 - Traffic Patterns
 - Environmental Conditions

Infection Control: Implementation Phase Infection Prevention & Control Activities

§416.51 (a)

- **Sanitary Environment**
 - **Environmental Cleaning**
 - **Team Effort**
 - **Contracted Company**
 - **Competency Training**
 - **Daily Inspection**
 - **Communication Log Book**

Infection Control: Evaluation Phase

Goals, Activities and Outcomes

§416.51 (b), (b2) and (b3)

- Performance Improvement Reporting
 - Physician Surveillance Reports
 - Post-op Infection Reports and Logs
 - Facility Environmental Surveys
 - Sterilization Reports
 - Employee Health
- Monitoring Tools for Compliance
 - Environmental Cleanliness
 - Hand Hygiene
 - Standard Precautions
 - Asepsis
 - Use Antimicrobials
 - IV Antibiotic Prophylactics
- Quality Council
- Evaluation Identifies Area of Concern or Improvement
- Corrective Action Plan
- Prioritized Risks Reviewed
- Goals Identified
- Audit Criteria

IN CONCLUSION

Successful compliance with the new Medicare Conditions of Coverage for Infection Control relies on the implementation and maintenance of certain key elements:

- Administrative Support
- Qualified Infection Control Leadership
- A functional and sanitary environment for the provision of surgical services
- A Comprehensive Plan for Surveillance, Prevention and Control of infections and communicable diseases.
- Mechanisms for doing investigation and resolution
- Demonstrated use of nationally recognized infection control standards and professionally recognized standards of practice
- Policies and Procedures
- Education for Physicians, Staff, Patients and Patient Families
- Mechanisms for Program Evaluation which are integral to the Quality Assessment and Performance Improvement Program

APPENDIX

Centers for Disease Control and Prevention (CDC)

1600 Clifton Rd.

Atlanta, GA 30333

Phone: (800) 232-4636

Internet: www.cdc.gov

Association for Professionals in Infection Control and Epidemiology, Inc. (APIC)

1275 K Street NW, Suite 1000

Washington, DC 20005-4021

Phone: (202) 789-1890

Fax: (202) 789-1899

Internet: www.apic.org

E-mail: apicinfo@apic.org

APIC Consulting Services

Phone: (202) 464-4252

Internet: www.apicconsulting.com/AM/Template.cfm?Section=Contact_Us1

E-mail: info@apicconsulting.com

APPENDIX

Association of Perioperative Registered Nurses (AORN)

2170 South Parker Road, Suite 400

Denver, Colorado 80231-5711

Phone: (800) 755-2676

Internet: www.aorn.org

American Society of PeriAnesthesia Nurses (ASpan)

10 Melrose Avenue, Suite 110

Cherry Hill, New Jersey 08003-3696

Phone: (877) 737-9696

Fax: (856) 616-9601

Internet: www.aspan.org

APPENDIX

Association for the Advancement of Medical Instrumentation (AAMI)

1110 North Glebe road, Suite 220

Arlington, VA 22201-4795

Phone: (703) 525-4890

Fax: (03) 276-0793

Internet: www.aami.org/

UNITED STATES DEPARTMENT OF LABOR

Occupational Safety & Health Administrations

200 Constitution Avenue, NW

Washington, DC 20210

Internet: www.osha.gov/

Accreditation Association for Ambulatory Health Care (AAHC)

5250 Old Orchard Road, Suite 200

Skokie, Illinois 60077

Phone: (847) 853-6060

Internet: <http://www.aaahc.org>

APPENDIX

The Joint Commission on Accreditation of Healthcare Organizations (JCAHO)

1515 West 22nd Street, Suite 1300W

Oak Brook, Illinois 60523

Phone: (630) 792-5000

Internet: www.jointcommission.org

2009 National Patient Safety Goals

Internet: <http://www.jointcommission.org/patientsafety/nationalpatientsafetygoals/>

International Association of Healthcare Central Service Materials Management (IAHCSMM)

213 West Institute Place, Suite 307

Chicago, Illinois 60610

Phone: (800) 962-8274

Fax: (312) 440-9474

Internet: www.iahcsmm.org/

APPENDIX

The Certification Board for Sterile Processing and Distribution, Inc. (CBSPD)

148 Main Street, Suite B-1

Lebanon, New Jersey 08833

Phone: (908) 236-0530

Voicemail: (800) 555-9765

E-mail: CBSPD@att.net

Internet: <http://www.sterileprocessing.org/cbspd.htm>

Certification Board of Infection Control and Epidemiology, Inc. (CBIC)

P.O. Box 19554

Lenexa, Kansas 66285-9554

Phone: (913) 895-4607

Fax: (913) 895-4652

E-Mail: cbic-info@goamp.com

Internet: <http://www.cbic.org/staff-cbic.asp>