

Endoscope Reprocessing: What CMS Surveyors Are Looking For

CMS surveyors use a worksheet to assess infection control practices during ASC surveys. The section of the worksheet used to assess practices surrounding the reprocessing of endoscopes is reproduced below. **Because this the SAME TOOL a CMS surveyor will use to assess practices associated with the reprocessing of endoscopes and accessories, it is also a useful SELF-ASSESSMENT tool for an ASC.**

Unless otherwise indicated, a “No” response to any question below will be cited as a deficient practice.

HIGH-LEVEL DISINFECTION

Practices to be Assessed	Was Practice Performed?	Manner of Confirmation
A. Semi-critical equipment is high-level disinfected or sterilized	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
B. Is high-level disinfection performed on site? (If NO, Skip to “F”)	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both

(A “No” answer does not result in a citation, since ASCs are permitted to provide for high-level disinfection off-site, under a contractual arrangement.)

(Surveyor to confirm there is a contract or other documentation of an arrangement for off-site sterilization by viewing it)

a. If answer to B was YES, please indicate method of high-level disinfection:	<input type="radio"/> Manual <input type="radio"/> Automated <input type="radio"/> Other (please print): <input style="width: 150px; height: 20px;" type="text"/>	
C. Items are pre-cleaned according to manufacturer’s instructions or evidence-based guidelines prior to high-level disinfection	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
D. a. Medical devices and instruments are visually inspected for residual soil and re-cleaned as needed before high-level disinfection	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
b. High-level disinfection equipment is maintained according to manufacturer instructions	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
c. Chemicals used for high-level disinfection are:		
I. Prepared according to manufacturer instructions	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both

II. Tested for appropriate concentration according to manufacturer's instructions	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
III. Replaced according to manufacturer's instructions	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
IV. Documented to have been prepared and replaced according to manufacturer's instructions	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
d. Instruments requiring high-level disinfection are:		
I. Disinfected for the appropriate length of time as specified by manufacturer's instructions or evidence-based guidelines	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
II. Disinfected at the appropriate temperature as specified by manufacturer's instructions on evidence-based guidelines	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
E. Items that undergo high-level disinfection are allowed to dry before use	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
F. Following high-level disinfection, items are stored in a designated clean area in a manner to prevent contamination	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
G. Additional breaches in high-level disinfection practices, not captured by the questions above were identified (If YES, please specify further in comments)	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
Comments: (please print and limit comments to the space provided)		

STERILIZATION

A. Critical equipment is sterilized	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
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- B. Are sterilization procedures performed on-site? Yes Observation
 (If NO, skip to "F") No Interview
 N/A Both

(A "No" answer does not result in a citation, since ASCs are permitted to provide for sterilization off-site, under a contractual arrangement.)

(Surveyor to confirm there is a contract or other documentation of an arrangement for off-site sterilization by viewing it)

- a. If YES to B, please indicate method of sterilization: Steam autoclave
 Peracetic acid
 Other (please print):

- C. Items are pre-cleaned according to manufacturer's instructions or evidence-based guidelines prior to sterilization Yes Observation
 No Interview
 N/A Both

Practices to be Assessed	Was Practice Performed?	Manner of Confirmation
D.	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
a. Medical devices and instruments are visually inspected for residual soil and re-cleaned as needed before packaging and sterilization	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
b. A chemical indicator is placed in each load	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
c. A biologic indicator is performed at least weekly and with all implantable loads	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
d. Each load is monitored with mechanical indicators (e.g. time, temperature, pressure)	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
e. Documentation for each piece of sterilization equipment is maintained and up to date and includes results from each load	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
E. Items are appropriately contained and handled during the sterilization process to assure that sterility is not compromised prior to use	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
F. After sterilization, medical devices and instruments are stored in a designated clean area so that sterility is not compromised	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both

G. Sterile packages are inspected for integrity and compromised packages are reprocessed	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
H. Additional breaches in sterilization practices not captured by the questions above were identified (If YES, please specify further in comments)	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
Comments: (please print and limit comments to the space provided)		