



## Center for Clinical Standards and Quality/Survey & Certification Group

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**Admin Info: 13-18-ASC**

**DATE:** February 8, 2013

**TO:** State Survey Agency Directors

**FROM:** Director  
Survey and Certification Group

**SUBJECT:** Draft Report: FY2010 Assessment of Infection Control Practices in Ambulatory Surgery Centers (ASCs) by State Survey Agencies (SAs): Feedback Requested

### Memorandum Summary

- **Draft Report: FY2010 SA Assessment of ASC Infection Control Practices in ASCs:** An analysis of the FY 2010 SA surveys of ASCs indicates differences among SAs in several key areas: completion rates of the Infection Control Worksheet (ICW); consistency of issuing citations when a lapse was recorded on the ICW; incidence of citations not consistent with documentation in the ICW; and citation at the standard- vs. condition-levels when multiple lapses were recorded.
- **Request for Feedback:** We are asking SAs to review the draft report and provide feedback and suggestions for actions to address the identified areas of differences.

Beginning in fiscal year 2010, the Centers for Medicare & Medicaid Services (CMS) required all SAs to assess ASC compliance with the Infection Control Condition for Coverage (CfC) by utilizing the ASC Infection Control Worksheet (ICW). SAs were asked to submit a copy of the completed ICW to the CMS contractor for all ASC surveys conducted in FY2010 and FY2011. The attached draft report describes the results of an analysis of the ICWs submitted for the surveys conducted in FY2010 and the associated Form CMS 2567s, Statement of Deficiencies and Plan of Correction (2567). This analysis focused on areas of SA performance; a separate analysis is being conducted of what the ICWs reveal about ASC infection control practices.

The results of the analysis focused on SAs reveal differences among them in four areas:

- Completing all applicable portions of the ICW;
- Consistency of issuing citations on the 2567 when a lapse has been recorded on the ICW worksheet;
- Incidence of infection control citations on the 2567 with no corresponding lapses identified on the ICW;
- Citation at the standard- vs. condition-levels when multiple lapses are recorded.

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This draft report is being shared with the SAs to support your internal review of your practices as well as further discussion with CMS to expand understanding about the sources of differences as well as actions that could be taken to reduce variation among SAs. We also request that you not circulate this draft report outside the SA, since it is a preliminary, deliberative document.

Please share your feedback and suggestions no later than March 8, 2013 with Erin McCoy at [erin.mccoy@cms.hhs.gov](mailto:erin.mccoy@cms.hhs.gov).

/s/

Thomas E. Hamilton

Attachment- Draft ASC Report

cc: Survey and Certification Regional Office Management