#### Exhibit 351

# AMBULATORY SURGICAL CENTER (ASC) INFECTION CONTROL SURVEYOR WORKSHEET

(Rev. 206; 06-21-22)

Name of State Agency or AO (please specify)	
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**Instructions:** The following is a list of items that must be assessed during the on-site survey, in order to determine compliance with the infection control Condition for Coverage. Items are to be assessed primarily by surveyor observation, with interviews used to provide additional confirming evidence of observations. In some cases information gained from interviews may provide sufficient evidence to support a deficiency citation.

The interviews and observations should be performed with the most appropriate staff person(s) for the items of interest (*e.g.*, the staff person responsible for sterilization should answer the sterilization questions). A minimum of one surgical procedure must be observed during the site visit. The surveyor(s) must identify at least one patient and follow that case from registration to discharge to observe pertinent practices. For facilities that perform brief procedures, e.g., colonoscopies, it is preferable to follow at least two cases. When performing interviews and observations, any single instance of a breach in infection control would constitute a breach for that practice.

Citation instructions are provided throughout this instrument, indicating the applicable regulatory provision to be cited on the Form CMS-2567 when deficient practices are observed.

PART 1 – ASC CHARACTERISTICS														
1. ASC Name	_												_	_
2. Address, State and Zip Code		Address										_		
	<u> </u>	City	,		Stat	:e				Ziţ	)		_	
3. 10-digit CMS Certification Nun	nber													
4. What year did the ASC ope operation?	n fory	, y	У	у										
5. Please list date(s) of site visit: m m	d d	y	у	у	Y	to m	n m	] [	d d	/	У	У	у	У
6. What was the date of the mos recent previous federal (CMS) su	-	m	m	/	d	d	]/ [	У	УУ	1	у			
7. Does the ASC participate in Mo	edicare via	accredit	ed "de	eemed	" statı	us?	0	YES NO						
7a. If YES, by which CMS-recognized accreditation		tation As an Assoc					•		-		-	 \AA/	ASF)	
organization(s)?		tation Co						-	,		(,		,	
0	The Joir	nt Comm	ission	(TJC)										

	7b. If YES, according to the ASC, what was the date of the most recent accreditation survey?		m	m	] / [ d	d	/	у	у у	у	
	What is the ownership of the facility? <b>LECT only ONE bubble)</b>	O H	nysician- ospital-o ational c ther (ple	wned orpo	d ration (ir	ncluding	g joint v	enture	s with p	hysicia	ns)
the ma	What is the primary procedure perfor ASC (i.e., what procedure type reflectionity of procedures performed at the lect only ONE bubble)		10. What additional procedures are performed at the ASC? (Select all that apply)  Do not include the procedure type indicated in question 9.								
000000000	Dental Endoscopy Ear/Nose/Throat OB/Gyn Ophthalmologic Orthopedic Pain Plastic/reconstructive Podiatry Other (please specify):			0000000000	Dental Endosco Ear/Nos OB/Gyr Ophtha Orthop Pain Plastic/ Podiatr Other ( N/A	se/Thro Imologi edic reconst	c ructive				
11. Who does the ASC perform  procedures on?  (Select only ONE bubble)  O Pediatric patients only O Adult patients only O Both pediatric and adult patients											
pro	What is the average number of cedures performed at the ASC <b>per nth</b> ?									peri	month
	How many Operating Rooms (includicedure rooms) does the ASC have?	ng	O 1	O 2	O 3	O 4	O 5	O 6	O 7	0	O 9+
Nu	mber actively maintained:		O 1	O 2	O 3	O 4	O 5	O 6	O 7	O 8	O 9+

14. Please indicate how the following services are provided: (fill in all that apply)										
	Contract	Employee	Other	If Other, Please print:						
Anesthesia/Analgesia	0	0	0							
Environmental Cleaning	0	0	0							
Linen	0	0	0							
Nursing	0	0	0							
Pharmacy	0	0	0							
Sterilization/Reprocessing	0	0	0							
Waste Management	0	0	0							
INFECTION CONTROL PROGRAM										
15. Does the ASC have an explicit in	15. Does the ASC have an explicit infection control program?  O YES O NO									
NOTE! If the ASC does not have an CFR 416.51 <b>must</b> be cited.	explicit infect	ion control pr	ogram, a condit	ion-level deficiency related to 42						
16. Does the ASC's infection contro guidelines?	ol program foll	ow nationally	recognized infe	oction control O YES O NO						
CFR 416.51(b) must be cited. Depe	NOTE! If the ASC does not follow nationally recognized infection control guidelines, a deficiency related to 42 CFR 416.51(b) <b>must</b> be cited. Depending on the scope of the lack of compliance with national guidelines, a condition-level citation may also be appropriate.									
NOTE! If the ASC cannot document for use in its infection control prog be cited. This is the case even if the generally accepted standards of prany nationally recognized guideline control standards of practice, then										

16b. If YES to (a), which	0	CDC/HICPAC Guidelines:								
nationally-recognized		O Guideline for Isolation Precautions (CDC/HICPAC)								
infection control guidelines has the ASC selected for its		O Hand hygiene (CDC/HICPAC)								
program?		O Disinfection and Sterilization in Healthcare Facilities (CDC/HICPAC)								
(Select all that apply)		<ul> <li>Environmental Infection Control in Healthcare Facilities (CDC/HICPAC)</li> </ul>								
	0	Perioperative Standards and Recommended Practices (AORN)								
	0	Guidelines issued by a specialty surgical society / organization (List)								
		Please specify (please limit to the space provided):								
	0	Others								
		Please specify (please limit to the space provided):								
in infection control and designat NOTE! If the ASC cannot docume certification) in infection control 416.51(b)(1) <b>must</b> be cited. Lack	ed to ent th to di of a o	Ith care professional qualified through training O YES of direct the ASC's infection control program? O NO nat it has designated a qualified professional with training (not necessarily irect its infection control program, a deficiency related to 42 CFR designated professional responsible for infection control should be level deficiency related to 42 CFR 416.51.								
17a. If YES, Is this person an: (Select only ONE bubble)		O ASC employee O ASC contractor								
17b. Is this person certified in (Note: §416.50(b)(1) does infection control.)		ction control (i.e., CIC)  require that the individual be certified in  O NO								
17c. If this person is <b>NOT</b> cert infection control, what type control training has this pe	e of	infection								
17d. On average, how many hoes this person spend in directing the infection con	the A	ASC hours per week								
infection control program, but it	is ex	the amount of time the person must spend in the ASC directing the pected that the designated individual spends sufficient time on-site insideration the size of the ASC and the volume of its surgical activity.)								

18. Does the ASC have a system to actively identify infections that may have been O YES related to procedures performed at the ASC?											
NOTE! If the ASC does not have a documented identification system, a deficiency O NO related to 42 CFR 416.51(b)(3) must be cited.											
18a. If YES, how does the ASC	0	The ASC sends e-mails to patients after discharge									
obtain this information? (Select ALL that apply)	0	The ASC follows-up with their patients' primary care providers									
(Select ALL that apply)	0	after discharge The ASC relies on the physician performing the procedure to obtain this information at a follow-up visit after discharge, and									
	0	report it to the ASC Other (please specify):									
18b. Is there supporting documenta	ation	confirming this tracking activity? O YES									
O NO											
NOTE! If the ASC does not have support cited.	ing d	locumentation, a deficiency related to 42 CFR 416.51(b)(3) must be									
18c. Does the ASC have a policy/pronotifiable disease reporting require											
	_	system, a deficiency <b>must</b> be cited related to 42 CFR 416.51(b)(3). ng; generally this would be done by the State health agency.									
19. Do staff members receive infection											
If training is completely absent, then co level citation in relation to 42 CFR 416.5											
to comply with infection control standa		·									
19a. If YES, how do they receive	0	In-service									
infection control training?	0	Computer-based training									
(Select all that apply)	0	Other (please specify):									
	0	Medical staff									
19b. Which staff members receive	0	Nursing staff									
infection control training? (Select all that apply)	0	Other staff providing direct patient care									
	0	Staff responsible for on-site sterilization/high-level disinfection									
	0	Cleaning staff									
	0	Other (please specify):									

19c. Is training:	0		the same for all categories of staff different for different categories of staff							
19d. Indicate frequency of staff infection control training (Select all that apply)	0 0 0	•	•							
19e. Is there documentation conf categories of staff listed above? NOTE! If training is not provided to ap training thereafter, a deficiency <b>must</b>	propri	ate staff upon hire,	granting of			refresher				
20. How many procedures were observed during the site visit?	O 1	O 2	O 3	O 4		O Other				
If other, please specify the nu	ımber:			procedures						

#### PART 2 - INFECTION CONTROL & RELATED PRACTICES

### **INSTRUCTIONS:**

- Please select ONE bubble for each "Was Practice Performed?" question, unless otherwise noted.
- If N/A or unable to observe is selected as the response, please explain why there is no associated
  observation, or why the question is not applicable, in the surveyor notes box. Surveyors should attempt
  to assess the practice by interview or document review if unable to observe the actual practice during
  survey.
- During the survey, observations or concerns may prompt the surveyor to request and review specific policies and procedures. Surveyors are expected to use their judgment and review only those documents necessary to investigate their concern(s) or to validate their observations.

## I. Hand Hygiene

Observations are to focus on staff directly involved in patient *c*are (e.g., physicians, nurses, CRNAs, etc.). Hand hygiene should be observed not only during the case being followed, but also while making other observations in the ASC throughout the survey.

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

Practices to be Assessed		s Practice formed?	Surveyor Notes:		
A. All patient care areas have readily accessible, i	n app	propriate locations:			
a. Soap and water	0	Yes			
	0	No			
b. Alcohol-based hand rubs	0	Yes			
	0	No			
I. If alcohol-based hand rub is available	0	Yes			
in patient care areas, it is installed as required. (There are LSC requirements at 42 CFR 416.44(b)(4) for installation of alcohol-based hand		No			
rubs)					
B. Staff perform hand hygiene:					
a. After removing gloves	0	Yes			
	0	No			
b. Before direct patient contact	0	Yes			
	0	No			
c. After direct patient contact	0	Yes			
	0	No			
d. Before performing invasive procedures	0	Yes			
(e.g. placing an IV)	0	No			
	0	Unable to observe			

e. After contact with blood, body fluids, or contaminated surfaces (even if gloves are worn)	000	Yes No Unable to observe							
C. Regarding gloves, staff:									
a. Wear gloves for procedures that might involve contact with blood or body fluids	0 0 0	Yes No Unable to observe							
b. Wear gloves when handling potentially contaminated patient equipment	0 0 0	Yes No Unable to observe							
c. Remove gloves before moving to the next tasks and/or patient	000	Yes No Unable to observe							
D. Personnel providing direct patient care do not wear artificial fingernails and/ or extenders when having direct contact with patients.	0	Yes No							
(e.g., anesthesiologists, certified registered nurse Unless otherwise indicated, a "No" response to a relation to 42 CFR 416.51(a).	and a e and ny qu he su	administering medications and performing injections esthetists, nurses). Destion below must be cited as a deficient practice in arveyor notes box why it was not observed and attempt							
NOTE: Some types of infection control breaches, including some specific to medication administration practices, pose a risk of bloodborne pathogen transmission that warrant engagement of public health authorities. When management review confirms that a survey has identified evidence of one or more of the breaches described in S&C: 14-36-All, in addition to taking appropriate enforcement action to ensure the deficient Medicare practices are corrected, the SA should also make the responsible State public health authority aware of the identified breach.									
Practices to be Assessed		s Practice Surveyor Notes formed?							
A. Needles are used for only one patient.	0 0	Yes No Unable to observe							

Pra	isinfected with alcohol prior to piercing.  D. Medication vials are always entered with a new eedle.  D. Medication vials are always entered with a new yringe  D. Medications that are pre-drawn are labeled with the date and time of draw, initials of the erson drawing, medication name, strength and eyond-use date and time  NOTE: A "No" answer should result in citation as Administration of Drugs  D. Single dose (single-use) medication vials are used for only one patient  D. Bags of IV solutions are used for only one		s Practice formed?	Surveyor Notes
В.	Syringes are used for only one patient (this	0	Yes	
		0	No	
		0	Unable to observe	
C. T	he rubber septum on a medication, whether	0	Yes	
unopened or previously accessed, vial is		0	No	
disi	nfected with alcohol prior to piercing.	0	Unable to observe	
D. N	Medication vials are always entered with a new	0	Yes	
nee	dle.	0	No	
		0	Unable to observe	
E. N	Medication vials are always entered with a new	0	Yes	
syringe .		0	No	
		0	Unable to observe	
F. Medications that are pre-drawn are labeled		0	Yes	
	·	0	No	
		0	Unable to observe	
		defi	cient practice in relat	tion to 42 CFR 416.48(a),
G.	a. Single dose (single-use) medication vials	0	Yes	
	are used for only one patient	0	No	
		0	Unable to observe	
	b. Bags of IV solutions are used for only one	0	Yes	
	patient (and not as a source of flush solution	0	No	
	for multiple patients).	0	Unable to observe	
	c. Medication administration tubing and	0	Yes	
	connectors are used for only one patient	0	No	
		0	Unable to observe	

Practices to be Assessed		s Practice formed?	Surveyor Notes
H. The ASC has voluntarily adopted a policy that medications labeled for multi-dose use for multiple patients are nevertheless only used for one patient.	0 0 0	Yes No N/A	
(Fill in N/A if no multi-dose medications/infusates <i>Questions "H, I and J" relate to injection practices</i> (NOTE: a "No" answer to question H. does not independ in a citation. <b>However</b> , a "No" response to excited).  If YES, please skip to "K"	s <i>and</i> icate	I not to multi-de a breach in inf	ection control practices and does not
If NO, you must also assess the practices at quest	tions	"I and J":	
I. Multi-dose vials are dated when they are first opened and discarded within 28 days unless the manufacturer specifies a different (shorter or longer) date for that opened vial. Note: This is different from the expiration date for the vial. The multi-dose vial can be dated with either the date opened or the beyond-use date as per ASC policies and procedures, so long as it is clear what the date represents and the same policy is used consistently throughout the ASC.	0 0 0	Yes No Unable to obs	serve
J. Multi-dose medication vials used for more than one patient are stored appropriately and do not enter the immediate patient care area (e.g., operating room, anesthesia carts).  NOTE: If multi-dose vials enter the immediate	0 0 0	Yes No Unable to obs	serve
patient care area, they must be dedicated for single patient use and discarded immediately after use.			
K. All sharps are disposed of in a puncture- resistant sharps container	0	Yes No	
L. Sharps containers are replaced when the fill line is reached	0	Yes No	

# III. Single Use Devices, Sterilization, and High Level Disinfection

Pre-cleaning must always be performed prior to sterilization and high-level disinfection

**Sterilization** must be performed for critical equipment (i.e., instruments and equipment that enter normally sterile tissue or the vascular system, such as surgical instruments)

**High-level disinfection** must be performed for semi-critical equipment (i.e., items that come into contact with non-intact skin or mucous membranes such as reusable flexible endoscopes, laryngoscope blades)

Observations are to be made of staff performing equipment reprocessing (e.g., surgical techs), unless these activities are performed under contract or arrangement off-site from the ASC.

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

### **SINGLE-USE DEVICES**

(Choose N/A if single-use devices are never reprocessed and used again) (Surveyor to confirm there is a contract or other documentation of an arrangement with a reprocessing facility by viewing it)

Practices to be Assessed				s Practice	Surveyor Notes	
			Per	formed?		
A.	a. If single-use devices are rep	rocessed, they are	0	Yes		
	devices that are approved by t	he FDA for	0	No		
	reprocessing		0	N/A		
	b. If single-use devices are rep	rocessed, they are	0	Yes		
	reprocessed by an FDA-approv	ed reprocessor.	0	No		
			0	N/A		
		STERILI	ZATIOI	N		
Α. (	ritical equipment is sterilized		0	Yes		
			0	No		
В. /	Are sterilization procedures perf	ormed on-site?	0	Yes		
(If I	IO, skip to "F")		0	No		
per	No" answer does not result in a mitted to provide for sterilizatio tractual arrangement.)	•	are			
(Su	veyor to confirm there is a cont	ract or other				
	umentation of an arrangement riewing it)	for off-site sterilization	on			
	a. <b>If YES to B</b> , please indicate	O Steam autoclav	/e			
	method of sterilization:	O Peracetic acid				
		O Other (please specify):				

Practices to be Assessed	Was Practice Surveyor Notes Performed?			
C. Items are pre-cleaned according to manufacturer's instructions or, if the manufacturer does not provide instructions, evidence-based guidelines prior to sterilization	<ul><li>Yes</li><li>No</li><li>Unable to observe</li></ul>			
D.  a. Medical devices and instruments are visually inspected for residual soil and re-cleaned as needed before packaging and sterilization	<ul><li>O Yes</li><li>O No</li><li>O Unable to observe</li></ul>			
<ul> <li>b. A chemical indicator (process indicator) is place correctly, as described in manufacturer's instructions for use, in the instrument packs in every load.</li> </ul>	Ced O Yes O No O Unable to observe			
c. A biological indicator is used at least weekly for each sterilizer and with every load containing implantable items, as evidenced by ASC documentation (i.e., log).	Or O Yes O No O Unable to observe			
d. Each load is monitored with mechanical indicators (e.g. time, temperature, pressure)	<ul><li>O Yes</li><li>O No</li><li>O Unable to observe</li></ul>			
e. Documentation for each piece of sterilization equipment is maintained and up to date and includes results from each load	O Yes O No			
E. Items are appropriately contained and handled during the sterilization process to assure that sterility is not compromised prior to use	O Yes O No O Unable to observe			
F. After sterilization, medical devices and instruments ar stored in a designated clean area so that sterility is not compromised	e O Yes O No			
G. Sterile packages are inspected for integrity and compromised packages are reprocessed	O Yes O No			

Practices to be Assessed	Was Practice Performed?	Surveyor Notes
H. Is immediate-use steam sterilization (IUSS) performed on-site?  If NO, skip to "High Level Disinfection Section"	O Yes O No	
If YES, you must also assess the practices at questions "I - K":  (A "No" answer does not result in a citation)		
<ul> <li>Work practices ensure proper cleaning and decontamination, inspection, and arrangement of the instruments into the recommended sterilizing trays or other containment devices before sterilization.</li> <li>Once clean, the item is placed within a container intended for immediate use. The sterilizer cycle and parameters used are selected according to the manufacturers' instructions for use for the device, container, and sterilizer.</li> <li>The sterilizer function is monitored with monitors (e.g., mechanical, chemical and biologic) that are approved for the cycle being used.</li> <li>The processed item must be transferred immediately, using aseptic technique, from the sterilizer to the actual point of use, the sterile field in an ongoing surgical procedure.</li> </ul>	O Yes O No	e
Note: "Immediate use" is defined as the shortest possible time between a sterilized item's removal from the sterilizer and its aseptic transfer to the sterile field. A sterilized item intended for immediate use is not stored for future use, nor held from one case to another. IUSS is not equivalent to "short cycle" sterilization performed in accordance with manufacturers' IFUs. IUSS must not be a routine or frequent practice in the ASC.		

Practices to be Assessed				Practice ormed?	Surveyor Notes
<ul> <li>J. Immediate-use steam sterilization is NOT potte following devices:         <ul> <li>Implants.</li> <li>Post-procedure decontamination of it used on patients who may have Creudisease or similar disorders.</li> <li>Devices that have not been validated specific cycle employed.</li> <li>Single-use devices that are sold sterile</li> </ul> </li> </ul>	nstrum tzfeldt- with tl	ients -Jakob	O Y O N		
K. Is IUSS performed on a routine basis?			O Y O N		
(A "Yes" answer <b>must</b> be cited as a deficient practice in relation to 42 CFR 416.51(a).				O	
HI	GH-LE\	/EL DISI	NFE	CTION	
Practices to be Assessed			Was Practice Performed?		Surveyor Notes
A. Semi-critical equipment is high-level disinfected or sterilized		or	000	Yes No N/A	
B. Is high-level disinfection performed on site? (If NO, Skip to "F")			0 0 0	Yes No N/A	
(A "No" answer does not result in a citation, s site, under a contractual arrangement.)	since A	SCs are	perr	nitted to pr	ovide for high-level disinfection off-
(Surveyor to confirm there is a contract or oth viewing it)	ner doo	cumenta	atior	of an arrar	gement for off-site sterilization by
a. If answer to B was YES, please indicate method of high-level disinfection:	O (pl	Manual Automa Other lease ecify):			
C. Items are pre-cleaned according to manufacturer's instructions or, if the manufacturer does not provide instructions, evidence-based guidelines prior to high-level disinfection			0 Y 0 N		

Practices to be Assessed		Was Practice Performed?		Surveyor Notes
D.	a. Medical devices and instruments are visually inspected for residual soil and re-cleaned as needed before high-level disinfection	0 0 0	Yes No Unable to observe	
	b. High-level disinfection equipment is maintained according to manufacturer instructions	000	Yes No Unable to observe	
	c. Chemicals used for high-level disinfection are:			
	I. Prepared according to manufacturer instructions	000	Yes No Unable to observe	
	II. Tested for appropriate concentration according to manufacturer's instructions	000	Yes No Unable to observe	
	III. Replaced according to manufacturer's instructions	000	Yes No Unable to observe	
	IV. Documented to have been prepared and replaced according to manufacturer's instructions	0	Yes No	
	d. Instruments requiring high-level disinfection are:			
	I. Disinfected for the appropriate length of time as specified by manufacturer's instructions or, if the manufacturer does not provide instructions, evidence-based guidelines	0 0 0	Yes No Unable to observe	
	II. Disinfected at the appropriate temperature as specified by manufacturer's instructions or, if the manufacturer does not provide instructions, evidence-based guidelines	0 0 0	Yes No Unable to observe	
	ems that undergo high-level disinfection are allowed ry before use	0 0 0	Yes No Unable to observe	
	ollowing high-level disinfection, items are placed in a gnated clean area in a manner to prevent contamination	0	Yes No	

# IV. Environmental Infection Control

# Observations are to be made of staff performing environmental cleaning (e.g., surgical technicians, cleaning staff, etc.)

If unable to observe is selected, please clarify in the surveyor notes box why it was not observed and attempt to assess by means of interview or documentation review.

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

Practices to be Assessed		s Practice formed?	Surveyor Notes
A. Operating rooms are cleaned and disinfected after each	0	Yes	
surgical or invasive procedure with an EPA-registered	0	No	
disinfectant	0	Unable to observe	
B. Operating rooms are terminally cleaned daily	0	Yes	
	0	No	
	0	Unable to observe	
C. Environmental surfaces in patient care areas are cleaned	0	Yes	
and disinfected, using an EPA-registered disinfectant on a	0	No	
regular basis (e.g., daily), when spills occur and when surfaces are visibly contaminated.	0	Unable to observe	
D. The ASC has a procedure in place to decontaminate gross	0	Yes	
spills of blood.	0	No	
V. Point of Care Devices (e.g., blood glucose meter)			
Observations are to be made of staff performing fingerstic	k te	sting (e.g., nurses)	
If unable to observe or N/A is selected, please clarify in the sapplicable and attempt to assess by means of interview or dunless otherwise indicated, a "No" response to any question relation to 42 CFR 416.51(a).	ocu	mentation review.	
Practices to be Assessed		s Practice formed?	Surveyor Notes
1. Does the ASC use a point-of-care testing device, such as a	0	Yes	
blood glucose meter?  If NO, STOP HERE.	0	No	

Practices to be Assessed		s Practice formed?	Surveyor Notes
A. Hand hygiene is performed before and after performing a	90	Yes	
finger stick procedure to obtain a sample of blood and using the point-of-care testing device.	g O	No	
B. Gloves are worn by health care personnel when	0	Yes	
performing a finger stick procedure to obtain a sample of blood, and are removed after the procedure (followed by hand hygiene).	0	No	
C. Finger stick devices are not used for more than one patient.	0	Yes	
	0	No	
NOTE: This includes both the lancet and the lancet holding device.	0	Unable to observe	2
D. If used for more than one patient, the point-of-care	0	Yes	
testing device (e.g., blood glucose meter, INR monitor) is	0	No	
cleaned and disinfected after every use according to the manufacturer's instructions.	0	N/A	
NOTE: if the manufacturer does not provide instructions for cleaning and disinfection, then the device should not be used for >1 patient.			