Safe Injection Practices: 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 safe injection practices is reproduced below. **Because this is the SAME TOOL a CMS surveyor will use to assess safe injection practices, 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.

II.   Injection Practices (injectable medications, saline, other infusates)
Observations are to be made of staff who prepare and administer medications and perform injections (e.g., anesthesiologists, certified registered nurse anesthetists, nurses).

Practices to be Assessed	Was Practice Performed?	Manner of Confirmation
A. Needles are used for only one patient	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
B. Syringes are used for only one patient	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
C. Medication vials are always entered with a new needle	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
D. Medication vials are always entered with a new syringe	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
E. Medications that are pre-drawn are labeled with the time of draw, initials of the person drawing, medication name, strength and expiration date or time	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
Note: A "No" answer should result in citation as a deficient practice in relation to 42 CFR 416.48(a), Administration of Drugs		
F. a. Single dose (single-use) medication vials are used for only one patient (A "No" response must be cited in relation to 42 CFR 416.48(a).)	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
b. Manufactured prefilled syringes are used for only one patient	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both

Practices to be Assessed	Was Practice Performed?		Manner of Confirmation	
c. Bags of IV solutions are used for only one patient	○ Yes ○ No ○ N/A		○ Observation ○ Interview ○ Both	
d. Medication administration tubing and connectors are used for only one patient	○ Yes ○ No ○ N/A		○ Observation ○ Interview ○ Both	

G. Please print all injectable medications/infusates that are in a vial/container used for **more than one patient:**

Name of Medication	Average number of patients per vial/container

H. Multi-dose injectable medications are used for only one patient	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both

(Note: a "No" answer here is not necessarily a breach in infection control and does not result in a citation. However, a "No" response to the related questions I - K should be cited).

(Fill in N/A if no multi-dose medications/infusates are used).

If YES, please skip to "L"

If NO, please answer "I-K":

I. The rubber septum on a multi-dose vial **used for more than one patient** is disinfected with alcohol prior to each entry	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
J. Multi-dose medications **used for more than one patient** are dated when they are first opened and are discarded within 28 days of opening or according to manufacturer's recommendations, whichever comes first	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both
K. Multi-dose medications, **used for more than one patient**, are not stored or accessed in the immediate areas where direct patient contact occurs	○ Yes ○ No ○ N/A	○ Observation ○ Interview ○ Both

CMS Infection Control Surveyor Worksheet: Safe Injection Practices

Practices to be Assessed	Was Practice Performed?		Manner of Confirmation	
L. All sharps are disposed of in a puncture-resistant sharps container	O	Yes	O	Observation
	O	No	O	Interview
	O	N/A	O	Both
M. Sharps containers are replaced when the fill line is reached	O	Yes	O	Observation
	O	No	O	Interview
	O	N/A	O	Both
N. Additional breaches in injection practices, not captured by the questions above were identified (If YES, please specify further in comments)	O	Yes	O	Observation
	O	No	O	Interview
	O	N/A	O	Both
Comments: **(please print and limit comments to the space provided)**				