

Hand Hygiene: 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 hand hygiene practices is reproduced below. **Because this the SAME TOOL a CMS surveyor will use to assess hand hygiene 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.

I. Hand Hygiene
Observations are to focus on staff directly involved in patient care (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. Interviews are used primarily to provide additional evidence for what the surveyor has observed, but may in some cases substitute for direct observation to support a citation of deficient practice.

Practices to be Assessed	Was Practice Performed?	Manner of Confirmation
A. All patient care areas have:		
Note: 42 CFR 416.51(a) should be cited only if the answer to both a and b is “No.”		
a. Soap and water available	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
b. Alcohol-based hand rubs available	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Observation <input type="radio"/> Interview <input type="radio"/> Both
I. If alcohol-based hand rub is available in patient care areas, it is installed as required. (There are LSC requirements at 42 CFR 416.44(b)(5) for installation of alcohol-based hand rubs)	<input type="radio"/> Yes <input type="radio"/> No	
B. Staff perform hand hygiene:		
a. After removing gloves	<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. After direct patient contact	<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. Before performing invasive procedures (e.g., placing an IV)	<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

Practices to be Assessed	Was Practice Performed?	Manner of Confirmation
d. After contact with blood, body fluids, or contaminated surfaces (even if gloves are worn)	<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. Regarding gloves, staff:		
a. Wear gloves for procedures that might involve contact with blood or body fluids	<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. Wear gloves when handling potentially contaminated patient equipment	<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. Remove gloves before moving to the next tasks and/or patient	<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. Additional breaches in hand hygiene, 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)		