

## 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.

**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	Was Practice Performed?	Surveyor Notes:
A. All patient care areas have <i>readily accessible, in appropriate locations</i> :		
a. Soap and water	<input type="radio"/> Yes <input type="radio"/> No	
b. Alcohol-based hand rubs	<input type="radio"/> Yes <input type="radio"/> No	
I. If alcohol-based hand rub is available in patient care areas, it is installed as required. <b>(There are LSC requirements at 42 CFR 416.44(b)(5) for installation of alcohol-based hand rubs)</b>	<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	
b. Before direct patient contact	<input type="radio"/> Yes <input type="radio"/> No	
c. After direct patient contact	<input type="radio"/> Yes <input type="radio"/> No	
d. Before performing invasive procedures (e.g. placing an IV)	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> <i>Unable to observe</i>	

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- e. After contact with blood, body fluids, or contaminated surfaces (even if gloves are worn)
- Yes
  - No
  - Unable to observe*
- 

C. Regarding gloves, staff:

- a. Wear gloves for procedures that might involve contact with blood or body fluids
- Yes
  - No
  - Unable to observe*
- 

- b. Wear gloves when handling potentially contaminated patient equipment
- Yes
  - No
  - Unable to observe*
- 

- c. Remove gloves before moving to the next tasks and/or patient
- 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.*
- Yes
  - No
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