Elizabeth Even, MSN, RN, CEN, Standards Interpretation Group

# Most Common EC/IC Challenges

February 22, 2024



# **Faculty Introduction**

- Elizabeth Even, RN, MSN, CEN
- Senior Associate Director, SIG
- Clinical and PES
- Standards +
- Entire Accreditation process





# **Objectives**

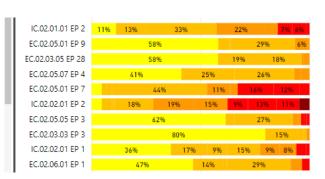
- Identify the top-cited standards in the Infection Control and Environment of Care Chapters in 2023
- Tools and Tips for Compliance
- How Leaders can affect change





# Top 10 EC/IC Findings 2023

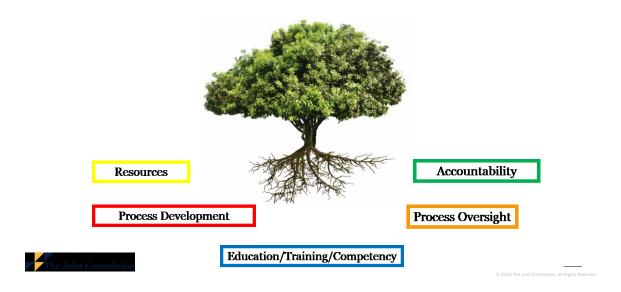




ASC 1/1/23-12/1/23



# What is the Root Cause?



# **Understanding the Root Cause Can Help Guide Activities and Resource Allocation**



#### IC.02.01.01 EP2

The organization uses standard precautions, \* including the use of personal protective equipment (PPE), to reduce the risk of infection















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#### **Standard Precautions**



Use Standard Precautions to care for all patients in all settings. Standard Precautions include:

- 5a. Hand hygiene
- 5b. Environmental cleaning and disinfection
- 5c. Injection and medication safety
- 5d. Risk assessment with use of appropriate personal protective equipment (e.g., gloves, gowns, face masks) based on activities being performed
- 5e. Minimizing Potential Exposures (e.g. respiratory hygiene and cough etiquette)
- 5f. Reprocessing of reusable medical equipment between each patient and when soiled

https://www.cdc.gov/infectioncontrol/guidelines/corepractices/index.html

# Observations: Standard Precautions

# Standard Precautions Not Performed • Hand hygiene not performed after glove removal • Gloves not worn when obtaining blood for blood glucose monitoring Supplies not available Process, procedure or policy unclear Lack of accountability

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# **Key Elements: Personal Protective Equipment**



#### Exposure Control Plan

Written document guides PPE Program

Risk assessed and updated annually



#### PPE Available

Types appropriate for exposure

Sized to fit healthcare workers

Available in locations of use



#### Trained Employees

Employees know why specific type of PPE should be used

Employees are competent to choose

Employees trained to don, doff, and discard or disinfect



#### Use Enforced

Monitoring and feedback provided

Employees use PPE



#### Action Taken When Issues are Identified

If identified as an issue, improve use

# **Observations: Personal Protective Equipment**

#### Personal Protective Equipment (PPE) not worn

- · OSHA hazard assessment not performed
- · Process, procedure or policy unclear
- · Supplies were not available
- · Staff were untrained
- · Lack of accountability

#### Staff did not correctly don and doff PPE

- Staff member did not don PPE per MIFU
- Employees were removing PPE in a manner that could contaminate themselves or the environment.

# Re-usable PPE not reprocessed as required by manufacturer's instructions for use

· Staff were not trained to clean and disinfect reusable PPE

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#### IC.02.01.01 EP2 Observations

"It was observed that CRNA did not perform cleaning of three newly opened medication vials."

"It was noted that five single use/dose medication vials were being used on multiple patients without adherence to CDC guidelines."

"Provider failed to complete hand hygiene immediately after removing his surgical gloves and surgical attire upon completion of cardiac catheterization procedures which was contrary to the organization policy"



# Observations - Standard Precautions - Injection and Medication Safety

#### Injection Safety

- Failure to swab the top of vials before access
- Multidose vials taken into patient treatment area
- Utilization of single patient IV fluids to make flush syringes

#### Sc. Injection and Medication Safety References and resources: 11, 17-20

- Use aseptic technique when preparing and administering medications
   Disinfect the access diaphragms of medication vials before inserting a device into the vial
- Use needles and syringes for one patient only (this includes manufactured prefilled syringes and cartridge devices such as insulin
- Enter medication containers with a new needle and a new syringe, even when obtaining additional doses for the same patient.
   Ensure single-dose or single-use vials, ampules, and bags or bottles of
- parenteral solution are used for one patient only.

  6. Use fluid infusion or administration sets (e.g., intravenous tubing) for
- one patient only

  7. Dedicate multidose vials to a single patient whenever possible. If multidose vials are used for more than one patient, restrict the medication vials to a controlland medication via vials via vials via vials vials via vials via vials via vials via vials vials
- medication vials to a centralized medication area and do not bring them into the immediate patient treatment area (e.g., operating room, patient room/cubicle)

  8. Wear a facemask when placing a catheter or injecting material into the
- Wear a facemask when placing a catheter or injecting material into the epidural or subdural space (e.g., during myelogram, epidural or spinal anesthesia)

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# **Key Elements: CDC Standard Precautions - Medication and Injection Safety**

# Activities Align with Requirements

- Laws, Codes and Regulation
- Manufacturer's Instructions for Use
- Required EBG

Observed Activities Align with Organizational Processes, procedures or policies

#### Supplies Available

# Interventions/Activities Implemented

- Included relevant organizational components and functions
- Training, education and/or competency

#### IC.02.02.01 EP2

High-level disinfection (HLD) and sterilization



- #1 on the Most
   Frequently Cited Higher Risk Accreditation
   Requirements
- In the Top 10 Infection Control Findings

Highest Percentage of High-Risk Findings and findings evaluated for Immediate Threat to
Health and Safety



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# Wide Variety of Supplies, Instruments and Devices Used in Ambulatory Settings



Single use vs. reusable

Varying levels of disinfection/sterilization required

Wide variation in sterilization cycle parameters

# What Type of Instruments/Devices do you have in Your Inventory?



May be supplied non-sterile and require sterilization prior to use

May be supplied sterile and ready to use



#### Reusable

May be supplied non-sterile and require sterilization prior to first use and after each use

May be supplied sterile and requires sterilization after each use

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#### Manufacturer's Instructions for Use (IFU)

- Most items utilized throughout all steps of reprocessing will have instructions for use
  - Equipment
  - Biologic indicators, Chemical indicators
  - Accessories used for reprocessing
  - Instruments/Devices
  - Cleaning accessories
- Provides instructions for use, maintenance, cleaning, disinfection and/or sterilization, when the item is not longer suitable for use
- Compatible disinfection/sterilization processes
  - May have instructions for reprocessing that surpass intended use (e.g., used for semi-critical procedure, IFU only provides instructions for sterilization

#### **Know your Instruments, Devices and Equipment**

#### This is Critical

- Validate the type of sterilization cycle that your sterilizer uses
  - Gravity Displacement
  - Dynamic Air Removal (Prevac, Steam Flush Pressure Pulse)
- Follow the MIFU of the instruments/devices being sterilized based on the type of sterilizer in use

One standard sterilization cycle/parameters is often not sufficient for reprocessing the different types of instruments and dental handpieces used in a dental office

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# IC.02.02.01 EP2

Staff members performing quality control testing of the sterilizer are not currently incubating positive controls with the processed BI when performing biological indicator testing, as required per the manufacturer's recommendations.

Vaginal probes were disinfected after patient use using a disinfectant wipe and did not undergo high level disinfection as required by the MIFU.

Review of sterile processing noted failure to perform sterilization of surgical instruments in accordance with manufacturer's instructions for use (IFU)



#### **Key Elements – High Level Disinfection**



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# Observations: MIFU Conflicts and Clarifications

Unclear MIFU not clarified

Conflicts within MIFU not clarified

• MIFU does not contain instructions for level of reprocessing based on intended use of the item

MIFU between instruments /sterilization accessories used not clarified

• Cycle parameters

# IC.02.02.01 EP1:

#### **Low and Intermediate Level Disinfection**





Product selection

Contact time

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# **Key Elements: Implementation**



# **Compliance Tactics**

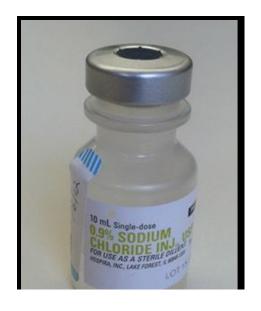


- Ensure adequate qualified infection control (IC) leadership
- Periodic review of IC program
- Ensure necessary resources to support IC program are available
- Appropriate staff training and competencies
- Routine process checks implemented by leadership



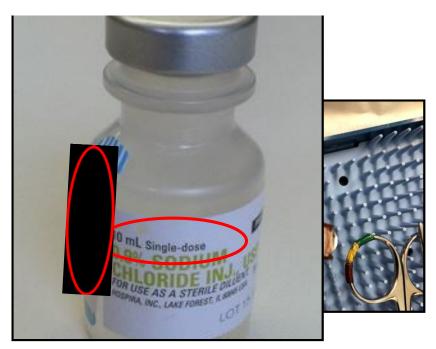
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# What's the problem?!





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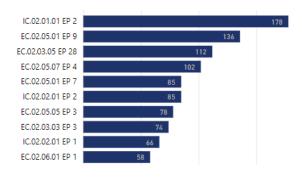


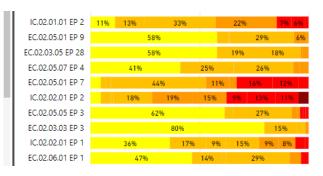




# **Environment of Care**

# Top 10 EC/IC Findings 2023







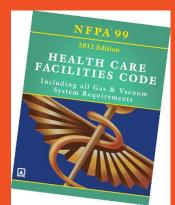
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# Application of NFPA 99

Health Care Facilities Code

2012 Edition

Adopted by CMS on May 4, 2016 Federal Register (Vol.81, No.86)



Referenced in TJC Environment of Care Standards

# NFPA 99 includes code requirements for:

Chapter 5	Gas and Vacuum Systems
Chapter 6	Electrical Systems
Chapter 9	Heating, Ventilation, and Air Conditioning
Chapter 10	Electrical Equipment
Chapter 11	Gas Equipment
Chapter 14	Hyperbaric Facilities
Chapter 15	Features of Fire Protection



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# Is the facility **NEW** or **EXISTING**?

Buildings are considered existing occupancies if final plans for construction, additions, renovations, or changes in occupancy were approved by the local authority having jurisdiction before July 5<sup>th</sup>, 2016

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# Commonly Used Acronyms

AHC	Ambulatory Health Care	NFPA	National Fire Protection Association		
ASC	Ambulatory Surgical Center	PCRA	Pre-construction Risk Assessment		
СоР	Condition of Participation	PDA	Preliminary Denial of Accreditation		
EP	Element of Performance	PFI	Plan for Improvement		
ESC	Evidence of Standards Compliance	PFP	Priority Focus Process		
FMEA	Failure Mode Effects Analysis	Mode Effects Analysis PFT			
FSA	Focus Standards Assessment PPE		Personal Protective Equipment		
ICM	Intracycle Monitoring	RFI	Requirement for Improvement		
ICRA	Infection Control Risk Assessment	SDS	Safety Data Sheet		
ILSM	Interim Life Safety Measures	SOC	Statement of Conditions		
ITL	Immediate Threat to Life	SPFI	Survey Plan for Improvement		
MOS	Measure of Success	TLW	Time Limited Waiver		



#### **FACILITY GUIDELINES INSTITUTE**

The keystone to health care planning, design, and construction

- For further information, refer to <u>Guidelines for Design and</u> Construction of Health Care Facilities, 2022 edition, administered by the Facility Guidelines Institute and published by the American Society for Healthcare Engineering (ASHE).



## **Utility System Control Labels**

- The organization labels utility system controls to facilitate partial or complete emergency shutdowns. (EC.02.05.01 EP9)
- Examples of utility system controls that should be labeled:
  - Utility source valves
  - Utility system main switches and valves
  - Individual circuits in an electrical distribution panel
  - Fire alarm circuit

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# **Utility System Control Labels**

# -Utility source valves



## **Utility System Control Labels**

Utility system main switches and valves







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# **Utility System Control Labels**



- Individual circuits in an electrical distribution panel
- -"The electrical panel had 7 circuits in the on position that were labeled as spares. This was confirmed by the facility staff."

## **Utility System Control Labels**

The fire alarm system's circuit is clearly labeled as Fire Alarm Circuit; the disconnect method (that is, the circuit breaker) is marked in red; and access is restricted to authorized personnel.

- Information regarding the dedicated branch circuit for the fire alarm

panel is located in the control unit.





# EC.02.05.07 EP4

Every week, the organization inspects the emergency power supply system (EPSS), including all associated components and batteries. The results and completion dates of the inspections are documented.



# **Solution:**

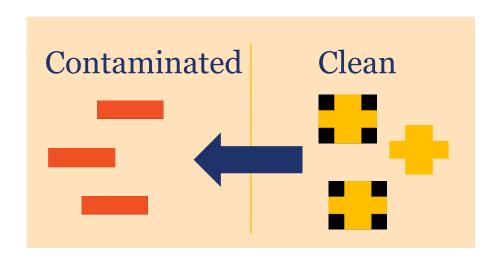
Educate maintenance staff and implement appropriate documentation process.

#### Control of Airborne Contaminants

The ventilation system provides appropriate pressure relationships, air-exchange rates, filtration efficiencies, relative humidity, and temperature (EC.02.05.01 EP7)

- Operating rooms
- Special procedure rooms that require a sterile field
- Rooms for patients diagnosed with or suspected of having airborne communicable diseases
- Patients in "protective environment" rooms
- Laboratories
- Pharmacies
- Sterile supply/processing rooms
- Other sterile spaces.

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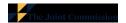
# Air-Pressure Relationships

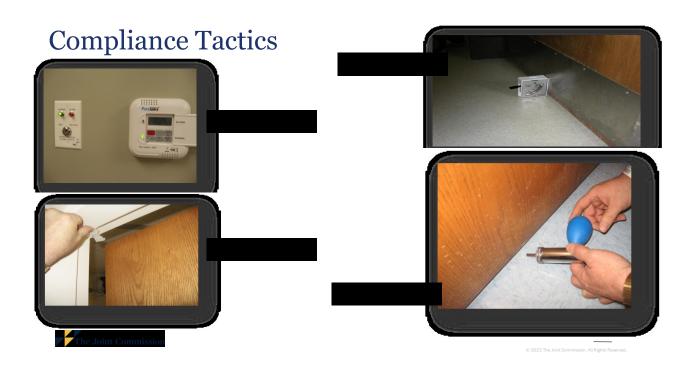
#### **Observation:**

Observed in Building Tour. The air pressure in the clean side of sterile processing was negative to the corridor. The air pressure in the clean and sterile storage room (approximately 3/4 sterile items) was negative to the corridor.

#### **Solution:**

Implement monitoring process (automated)





## **Interior Spaces are Safe and Suitable**

 Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment, or services provided. (EC.02.06.01 EP1)





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#### **Hazardous Chemical Risks**

 The organization minimizes risks associated with selecting, handling, storing, transporting, using, and disposing of hazardous chemicals. (EC.02.02.01 EP5)







## Fire Safety Equipment & Building Features

- Testing requirements from EC.02.03.05:
  - Supervisory signal devices on the inventory
  - Vane-type and pressure-type water flow devices and valve tamper switches
  - Duct detectors, heat detectors, manual fire alarm boxes, and smoke detectors
  - Visual and audible fire alarms, including speakers and door-releasing devices
  - Fire alarm equipment on the inventory for notifying off-site fire responders
  - Electric motor—driven fire pumps monthly and diesel engine—driven fire pumps every week under no-flow conditions
  - Water-storage tank high- and low-water level alarms

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## Fire Safety Equipment & Building Features (continued)

- Main drains at system low point or at all system risers
- Fire department water supply connections
- Fire pumps under flow
- Hydrostatic and water-flow tests for standpipe systems
- Carbon dioxide and other gaseous automatic fire-extinguishing systems
- Inspects portable fire extinguishers
- Maintenance on portable fire extinguishers, including recharging
- Hydrostatic tests on standpipe occupant hoses

## Fire Safety Equipment & Building Features (continued)

- Operates fire and smoke dampers one year after installation and then at least every four years to verify that they fully close
- Automatic smoke-detection shutdown devices for air-handling equipment
- Sliding and rolling fire doors, smoke barrier sliding or rolling doors, and sliding and rolling fire doors in corridor walls and partitions for proper operation and full closure
- Inspection and testing of fire door assemblies
- Elevators with firefighters' emergency operations

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## **ITM Time Frames for Inspections Defined**

- The Joint Commission EC chapter defines time as:
  - Every 36 months/every 3 years = 36 months <u>from the last event</u>, plus or minus
     45 days
  - Annually/every 12 months/once a year/every year = 1 year <u>from the last event</u>, plus or minus 30 days
  - Every 6 months = 6 months <u>from the last event</u>, plus or minus 20 days
  - Quarterly/every quarter = every three months, plus or minus 10 days
  - Monthly/30-day intervals/every month = 12 times a year, once per calendar month
  - Every week = once per calendar week

# EC.02.03.05 Document List & Review Tool

STANDARD - EPs	C NC NA IOU		gend NA IIC	Document / Requirement	Frequency	Q 1/ Semi	Q 2	Q:3/ Semi	Q 4/ Annual
EC.02.03.05				Fire Protection and Suppression Testing and Inspection					
EP 1				Supervisory Signals-including: Control valves; pressure supervisory; pressure tank, pressure supervisory for a dry pipe (both high and low conditions), steam pressure, water level supervisory signal initiating device; water temperature supervisory; and room temperature supervisory.	Quarterly				
EP 2				Water flow devices	Semiannually				
				Tamper switches	Semiannually				
EP 3				Duct, heat, smoke detectors, and manual fire alarm boxes	Annually				
EP 4				Notification devices (audible & visual), and door-releasing devices	Annually				
EP 5				Emergency services notification transmission equipment	Annually				
EP 6	Electric motor-driven fire pumps tested under no-flow conditions	Monthly							
	П			Diesel-engine-driven fire pumps tested under no-flow conditions	Weekly				
EP 7				Water storage tank high and low level alarms	Semiannually				
EP 8				Water storage tank low water temp alarms (cold weather only)	Monthly				
EP 9				Sprinkler systems main drain tests on all risers	Annually				
EP 10				Fire department connections inspected (Fire hose connections N/A)	Quarterly				
EP 11				Fire pump(s) tested – under flow	Annually				
EP 12				Standpipe flow test every 5 years	5 years			•	•
EP 13	$\Box$			Kitchen suppression semi-annual testing	Semiannually				
EP 14				Gaseous extinguishing systems inspected (no discharge req.)	Annually				
EP 15				Portable fire extinguishers inspected monthly	Monthly				•
EP 16				Portable fire extinguishers maintained annually	Annually				
EP 17				Fire hoses hydro tested 5 years after install; every 3 years thereafter	5 years / 3 years				
EP 18				Smoke and fire dampers tested to verify full closure		year after Install t least every 6 years thereafter			
EP 19		-	-	Smoke detection shutdown devices for HVAC tested	Annually				
EP 20				All horizontal and vertical roller and silder doors tested	Annually				
EP 25				inspection and testing of door assemblies by qualified person	Annually				
EP 27				Documentation of maintenance testing and inspection activities for EPs 1-20 and 25 includes: activity name; date; inventory of devices, equipment or other items; frequency; contact info for person performing activity. NPA standard; activity results					

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# Fire Door Inspections

- Annual inspection
- Knowledgeable person
- Operating components
- Both sides of the opening
- Documented





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# Portable Fire Extinguishers

- Monthly visual inspection
  - Accessible
  - Fully charged
  - Any parts broken
  - Correct type
- Annual maintenance by a licensed fire protection service company
- Extinguishers less than 40 lbs. cannot be installed above 60" (measured from top)







# EC.02.03.05 EP28

Documentation of maintenance, testing, and inspection activities for Standard **EC.02.03.05**, **EPs 1–20**, **25** (including fire alarm and fire protection systems) includes the following:

- Name of the activity
- Date of the activity
- Inventory of devices, equipment, or other items
- Required frequency of the activity
- Name and contact information, including affiliation, of the person who performed the activity
- NFPA standard(s) referenced for the activity
- Results of the activity



# **Sterilizer Testing and Maintenance**

- The organization conducts performance testing of and maintains all sterilizers.
- These activities are documented EC.02.04.03 EP4 (IC.02.02.01 EP2)





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EC.02.05.05 EP3

The organization inspects, tests, and maintains the following: Utility systems.

The completion dates and test results are documented.



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# What's the problem?!





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# What's the problem?!













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# What's the problem?!





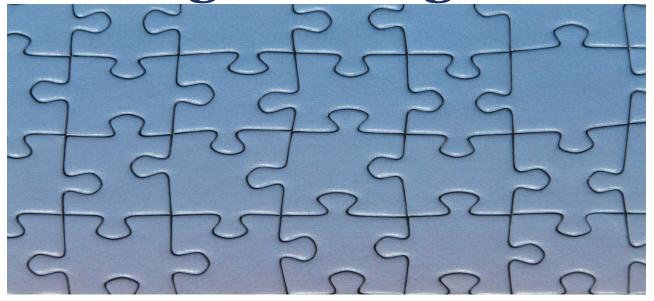


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# Points for creativity?!?



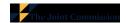
Putting it all together





# Leadership Oversight

- Who do you need and where do you need them?
  - High risk areas/procedures
  - High-level disinfection/sterilization
  - Surgery/procedures
  - Dental







# Safety Culture

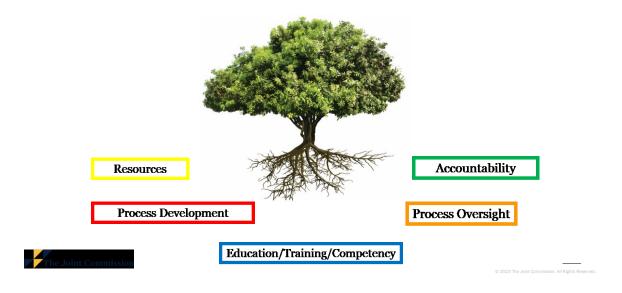
- Leaders can build safety cultures by readily and willingly participating with care team members in initiatives designed to develop and emulate safety culture characteristics.
- Effective leaders who deliberately engage in strategies and tactics to strengthen their organization's safety culture see safety issues as problems with organizational systems, not their employees, and see adverse events and close calls ("near misses") as providing "information-rich" data for learning and systems improvement.



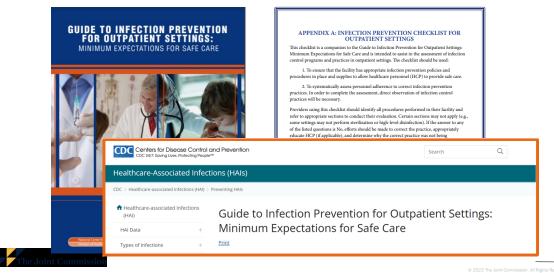


https://www.jointcommission.org/-/media/tjc/documents/resources/patient-safety-topics/sentinel-event/sea-57-safety-culture-and-leadership-final2.pdf

## What is the Root Cause?



# **Ambulatory Infection Prevention Resources**



https://www.cdc.gov/hai/settings/outpatient/outpatient-care-guidelines.html

# Approach to Assessing Compliance





Modified from April 2019 Perspectives (available at https://www.jointcommission.org/-/media/tjc/documents/resources/patient-safety-topics/infection-prevention-and-hai/ic-hierarchical-approach-to-scoring-standards-april-2019-perspectives.pdf © The Joint Comm<del>ission</del>. Used with permission.

# The Basis for Physical Environment Standards



# Survey Resources

- To prepare for document review, the Survey Activity Guide includes a "Life Safety and Environment of Care—Document List and Review Tool"
- This resource is located on The Joint Commission website at <a href="https://www.jointcommission.org/">https://www.jointcommission.org/</a>-/media/tjc/documents/resources/patient-safety-topics/physical-environment/lsc\_ec\_doclist\_revtool.pdf



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# **Building Tour Guidance**

- Reflects what a tour should include
- Lists related standards / EPs
- · Only guidance
- Does not reflect touring order

Available online: https://www.jointcommission.org/-/media/tjc/documents/resources/patient-safetytopics/physical-environment/life-safetycode/building tour guidance1.pdf



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ift Shop a Storage limitations, fire door ratings, open to the corridor

**Building Tour Guidance** 

#### **Connect With Us**



Joint Commission Connect



Report a Safety Concern









