

# THE ADVISOR

MONTHLY COMPLIANCE COMMUNICATOR

## INSTRUMENT PROCESSING: THE SERIES

### INSTRUMENT CLEANING

The first article in this series provided an overview of instrument processing. This article will focus on cleaning contaminated instruments, which begins with transport from the point of use to the decontamination and sterilization area.

When transporting contaminated instruments, place the instruments in a closable container that is leakproof on the sides and bottom. The container must be identified as a biohazard in some manner, by either a biohazard label or the container being red or having a red lid. The amount of time between use and decontamination should be as short as possible. Soil which remains on instruments for extended periods create an ideal environment for microbe growth and increases the risk of corrosion. Additionally, dried soil is more challenging to remove.

Once the instruments have been safely transported the goal is to reduce the contamination of the instruments by cleaning and then ensuring that they are thoroughly rinsed and dried prior to packaging for the actual sterilization process. You must consult the manufacturer's instructions for use (IFU) for appropriate guidance on both the cleaning process and the selection of the appropriate cleaning product. Using detergents not recommended by the manufacturer can impact the longevity of the instruments. Keep in mind these other recommendations from the AAMI when making detergent selections.

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## INSTRUMENT PROCESSING: THE SERIES

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Detergents must be:

- compatible with the medical device or container system to be cleaned as well as with the materials used in the cleaning equipment itself;
- efficacious on the types of clinical soil typically found on medical instruments after clinical use;
- nonabrasive;
- low-foaming;
- free-rinsing (i.e., easily removed from the medical device);
- biodegradable;
- rapid dissolve;
- nontoxic; and
- have a shelf life and use-life consistent with the anticipated clinical use.

To ensure the best outcome follow these steps in cleaning contaminated instruments.

### 1. Rinse instruments in cold water or soak in cool water.

You may also consider some sort of pretreatment product such as an enzymatic cleaner for instruments grossly contaminated or if recommended by the manufacturer.

### 2. Clean the instruments manually or by placing them in either an ultrasonic or instrument washer.

When cleaning instruments manually don the appropriate PPE. Use face protection, heavy duty utility gloves and a cover gown. Focus attention on difficult to clean areas of the instruments including any hinges, joints or serrations.

If using a mechanical means for washing instruments, these devices must be cleared by the FDA for instrument washing. Dishwashers, even professional washers, are not indicated for washing medical/dental instrumentation. Refer to the manufacturer's IFU to select the right piece of equipment for washing instruments and the proper detergent.

Water temperature can impact the ability to remove contaminants. Lukewarm water, ranging from 80 – 100 F and detergent will prevent coagulation and make it easier to remove protein substances, such as blood.

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# TMC INFECTION CONTROL

## INSTRUMENT PROCESSING: THE SERIES

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### 3. Rinse, dry and inspect the instruments prior to packaging for sterilization.

After washing the instruments either by hand or by using an ultrasonic, the instruments should be rinsed to thoroughly remove the detergent used for cleaning, then dried prior to packaging. Use of a non-linting cloth to dry is acceptable but remember to wear heavy duty utility gloves to reduce the likelihood of a sharps injury.

Instrument washers include both a rinse and drying cycle which deliver instruments which are ready for inspection and packaging. Each instrument should be inspected visually to ensure contaminants have been removed and that there are no signs of rust or damage to instruments. For smaller, harder to see areas of instruments, a magnifying glass may be necessary. Once you are assured the instruments are clean and not damaged, they are ready for packing in anticipation of the sterilization cycle.

Many will rush through instrument cleaning perhaps not realizing it is a critical step in the process. It is critical to remember that EACH step in the process is equally important. Slow down a bit and focus on one step at a time to ensure all instruments are safe for use on patients.

Reference:

ANSI/AAMI ST79 2017. (2017). Arlington Virginia: AAMI, pp.39 - 48.

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# TMC OSHA COMPLIANCE

## SHOW THE LOVE FOR YOUR TMC CONSULTANT

Here at TMC we strive to build relationships with our clients while providing quality, dependable service. Just for fun, we ran a contest through social media and our website, where our clients could enter to win by telling us how we're doing. Thank you for the great responses and the kind words!

Everyone who gave us feedback was entered in the contest and one winner was chosen to receive a cash gift card and a Valentine's gift basket. Our winner is Dr. Hill and staff from Madison, North Carolina! Congratulations Dr. Hill and staff!

You can view these testimonies and others on our [website](#).

- We love Nancy because she is awesome!
- S'Elaina - She is knowledgeable, concise, patient and advocates for her clients.
- Janice - She is knowledgeable and kind.
- Janice - She always keeps our training light and fun!
- Heidi is so good at her job, it's enjoyable to listen and learn! Our office is made better by having her expertise available.
- Heidi is so responsive as well as knowledgeable. She never makes me feel stupid or that I am bothering her when I ask questions throughout the year. She is truly outstanding at her job!
- Nancy rocks!!!



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# TMC HIPAA COMPLIANCE



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## HOW IMPORTANT IS YOUR IT PARTNER?

The days of having your computer work done by your friend's nephew or the neighborhood fix-it guy are over. Your IT professional needs to be well versed in HIPAA. They also need to be motivated to keep up with the changing threat environment. It can literally save you millions of dollars and sleepless nights.

Now that your protected health information is stored on computers you are vulnerable to hackers and other cybercriminals. Your system needs to be protected as diligently as possible. This used to mean you needed individual passwords, a firewall and a virus protection package. That is still important, but it is not enough. As you grow and add technology your firewall and virus protection need to grow with you and be constantly updated. Tools such as Active Directory should be included to control who has access to what systems in addition to individual passwords.

Mobile devices like laptops, tablets and smartphones have also brought new problems into the workplace. Smart medical devices that store data like digital x-rays and ultrasounds must be protected. Transmissions and data streaming for billing, prescriptions, Health Information Exchanges (HIE) and system backups, can create vulnerabilities. Remote access by employees add more potential points of error and attack. A good IT company can help you build a tightly controlled system.

Your system must be monitored constantly. Your IT company can help you develop safeguards, alerts and audits. These are vital to your information protection as they allow you to identify threats and respond quickly. An important part of any systems maintenance must be a good Risk Analysis to identify potential problems. These problems must then be addressed by developing a Corrective Action Plan (CAP) that is followed and documented. Your IT partner can help you identify your risks and recommend and help implement solutions. Not having a Risk Analysis of your current system and an active CAP is the number one reason for large fines and settlements from HHS. Don't forget that a good Risk Analysis and CAP needs to include your paper, physical safeguards and termination processes too.

Building and/or maintaining a good system is great but no system is totally secure. Finding out how quickly your IT people can respond to a threat is best done upfront than in middle of a crisis. A client recently had a great demonstration of that issue. Ransomware is a rapidly growing and devastating attack. In a ransomware attack the cybercriminals insert a virus that usually doesn't penetrate your system but instead adds a layer of security on top of yours. This prevents you from accessing your own systems. HHS has stated that if you can't access your patient information in a timely manner then it is a breach, usually involving all your patients past and present. The client's IT company had them up and accessing records within 2 hours and operating in real time before the next business day thus preventing a breach that could have cost them greatly in time, reputation and money.

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# TMC OSHA COMPLIANCE

## OSHA VIOLATIONS AND FINES

A primary concern for most healthcare offices when it comes to OSHA are specific violations and potential fines.

### What are the fines for each type of violation?

OSHA doesn't differentiate between different violations on the amount of the fine. OSHA has three types of violation categories and associated fines. They were granted a charter by the government to increase the fines each year during the last administration. The 2019 categories and fines are as follows:

Category 1: First time violations, regardless of "Serious" or "Other-Than-Serious": \$13,260 per violation

Category 2: Willful and repeat: \$132,598 per violation

Category 3: Failure to fix (abate): \$13,260 per day beyond abatement date

There is a 60% automatic deduction for small businesses and a 10% to 45% deduction after that for having a good OSHA program in place. (TMC clients usually see the full 45% deduction.) Further deductions can be offered at the discretion of the OSHA manager especially on first time "other-than-serious" violations.

### What are the most common OSHA violations for healthcare?

- Lack of documentation to prove Hepatitis B vaccinations were offered within 10 days of employment to all potentially exposed workers and that HBV was effective, or counselling given
- Failure to offer exposed employees counselling by a qualified provider
- No GFCB on outlets near water
- Overfilled Sharps containers
- Failure to provide training to new employees before they start working
- Failure to provide training every 365 days to all employees
- Improper personal protective equipment (PPE) and procedures for Sharps handling
- Improper PPE for handling corrosives (including easily available eyewash stations)
- Unsecured gas cylinders
- Lack of a good plan for handling exposure incidents
- Broken or missing faceplates on outlets and other exposed wires
- Trip hazards
- Missing or inaccessible SDS sheets
- No Sharps documentation
- Improper laundry handling
- Failure to clearly mark exit routes
- Lack of Hazard Communication Certification documentation and training

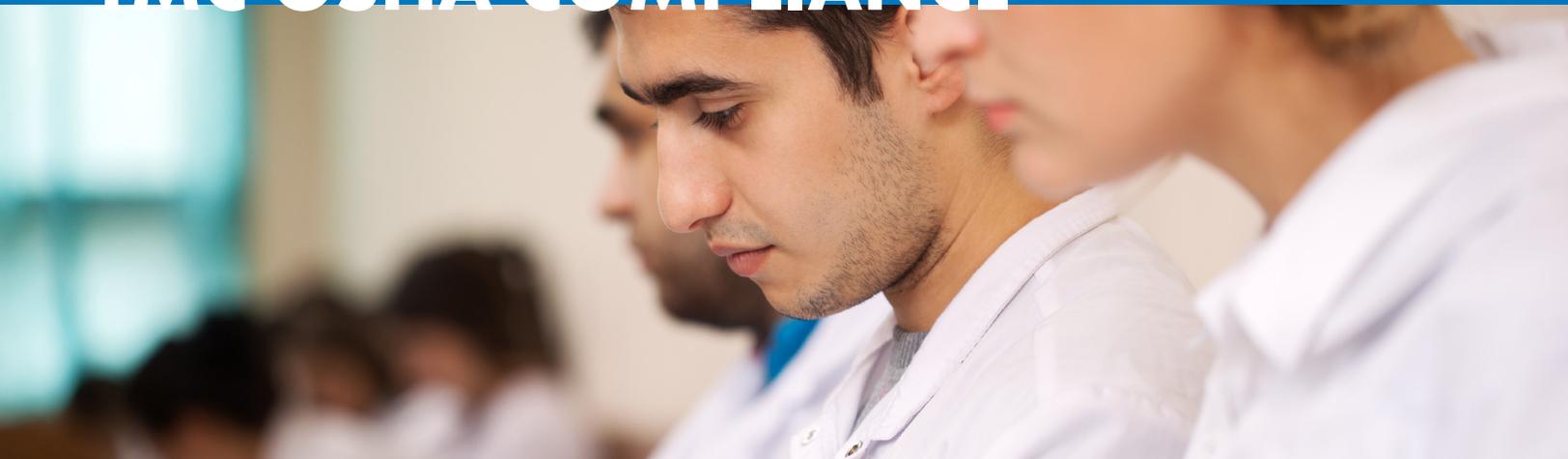
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# TMC OSHA COMPLIANCE



## OSHA VIOLATIONS AND FINES

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In addition to these often-seen violations, OSHA has stated that they will be focusing on the following areas:

- **Nitrous oxide equipment:** To avoid a fine, be sure to include equipment maintenance and quarterly testing of personal and room nitrous oxide air levels in your compliance plan.
- **Workplace violence plan and training:** Now is a good time to make sure that your employee manual includes a written Workplace Violence Prevention Program
- **Non-reporting of workplace injuries or illnesses:** Evaluate your procedures now to make sure they do not discourage employees from reporting.

## QUALITY ANNOUNCEMENT

### Help Us Help You

Here at TMC we love our clients! Our consultants and Client Service Center work hard to stay informed about healthcare compliance and employee safety. In order to support them and in turn support you, we have created a Consultant Quality Assurance Program (CQAP). The program focuses on reviewing our work. This will help us identify areas where we need to improve to give you the best service possible.

Each month, Karen Gregory, our Director of Compliance and Education, will visit randomly selected clients who have received OSHA and HIPAA on-site training, and perform an audit of their manuals. She will also review the completed Risk Analyses for the past six years of your service. There should be no interruption to your practice workflow. All that we ask is that you provide access to your manuals and a bit of space in the office where Karen can review them.

We will contact clients either by phone or email with a potential date and time. We hope that you will choose to participate but will totally understand if this does not work with your schedule. Thank you for helping us help you!

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## PROTECT YOURSELF

Smartphones are true modern-day marvels. They allow us a level of convenience that was inconceivable just a decade ago. We can video chat with family across the world, order pizza or schedule a dog walker with the push of a button. But there are a variety of risks associated with your smartphone — including theft, fake applications and malicious software. Here are a few steps you can take to reduce these risks.

- Only download apps from well known vendors such as Apple Store and Google Play.
- Enable a PIN on your phone. We have all misplaced our phones on occasion — you wouldn't want someone to pick it up and begin accessing all of your data.
- Configure your phone to automatically wipe (delete all data) after a set number of failed login attempts. This will prevent someone from repeatedly taking guesses in hopes of unlocking your phone.
- Configure your phone to automatically backup to the cloud. Losing your phone is bad enough without also losing all of your pictures and contacts.
- Use a good PIN code. Trying the most common PINs (such as 1111, 1234, birth years) will unlock a good number of phones (and debit cards).

The above content was brought to you by North Wonders ([www.NorthWonders.com](http://www.NorthWonders.com)). They offer security awareness programs that significantly reduce the risk of ransomware, phishing, and compromised bank credentials — helping protect clinical data, patient personal information and your business assets.

## IT'S YOUR CALL

### OSHA Situation:

We recently hired a new clinical worker who received a 2-dose series for Hepatitis B and titer. Is there really a 2-dose series?

### HIPAA Situation:

What is the deadline for reporting a breach to Health and Human Services (HHS)?

[CLICK HERE FOR THE ANSWERS](#)

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SIGNATURE

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## INSTRUCTIONS

Print and post newsletter in office for staff review. Each member should sign this form when completed. Keep on file as proof of training on these topics.

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