

# CMS State Operations Manual

## Appendix L - Guidance for Surveyors: Ambulatory Surgical Centers



Control Question	Source	Section	Desired Response
Is the medical staff of the ASC accountable to the governing body?	§416.45	Medical Staff Privileges and Accountability	YES
Does the ASC have a written policy that holds the medical staff accountable to the governing body?	Interpretive Guidelines §416.45	Policy and Procedure Documentation	YES
Does the medical staff accountability policy of the ASC meet all coverage condition requirements?	Interpretive Guidelines §416.45	Medical Staff Privileges and Accountability	YES
Are both physician and non-physician practitioners allowed to be granted medical staff privileges?	Interpretive Guidelines §416.45	Oversight of Non-Physician Practitioners	YES
Are medical staff privileges granted in accordance with the practitioners' scope of practice as permitted by the State?	Interpretive Guidelines §416.45	Clinical Privilege Reappraisal	YES
Do the granted medical staff privileges reflect the practitioners' training and clinical experience?	Interpretive Guidelines §416.45	Clinical Privilege Reappraisal	YES
Does the physician owner implement a formal process for complying with all medical staff regulatory requirements?	ASC ownership descriptio	Regulatory Compliance	YES
Does the ASC have a policy detailing how the governing body holds the medical staff accountable?	Survey Procedures §416.45	Medical Staff Privileges and Accountability	YES
Are members of the medical staff legally and professionally qualified for the positions to which they are appointed?	§416.45(a) Standard: Membership and Clinical Privileges	Medical Staff Privileges and Accountability	YES
Does the ASC grant privileges in accordance with recommendations from qualified medical personnel?	§416.45(a) Standard: Membership and Clinical Privileges	Medical Staff Privileges and Accountability	YES
Are medical staff privileges specified in detail for the types of procedures they may perform within the ASC?	Interpretive Guidelines §416.45(a)	Medical Staff Privileges and Accountability	YES

Control Question	Source	Section	Desired Response
Does the ASC's governing body grant medical staff privileges only to legally and professionally qualified practitioners?	Interpretive Guidelines §416.45(a)	Medical Staff Privileges and Accountability	YES
Does the ASC verify each practitioner's current professional license and document it in the practitioner's file?	Interpretive Guidelines §416.45(a)	Medical Staff Privileges and Accountability	YES
Has the practitioner demonstrated competence in the area for which privileges are sought?	Interpretive Guidelines §416.45(a)	Medical Staff Privileges and Accountability	YES
Is the opinion of qualified medical personnel solicited on the competence of applicants for privileges?	Interpretive Guidelines §416.45(a)	Medical Staff Privileges and Accountability	YES
Does the ASC document the process by which the governing body grants medical staff privileges?	ASC's documentation process for granting privileges	Policy and Procedure Documentation	YES
Does the ASC's documentation include the credentials reviewed for each candidate?	ASC's documentation process for granting privileges	Policy and Procedure Documentation	YES
Are the criteria used in evaluating the candidate for medical staff privileges documented by the ASC?	ASC's documentation process for granting privileges	Policy and Procedure Documentation	YES
Does the ASC document how it selects the qualified medical personnel who make recommendations on the practitioner's qualifications?	ASC's documentation process for granting privileges	Policy and Procedure Documentation	YES
Is there documentation on whether and under what circumstances the governing body may make a privileging decision contrary to the recommendation of the qualified medical staff?	ASC's documentation process for granting privileges	Policy and Procedure Documentation	YES
Does the ASC's leadership explain its process for granting clinical privileges when asked?	Survey Procedures: §416.45(a)	Policy and Procedure Documentation	YES
Does the ASC have documentation of state licensure, registration, or state certification for medical staff as applicable?	Survey Procedures: §416.45(a)	Policy and Procedure Documentation	YES

Control Question	Source	Section	Desired Response
Is there evidence of certification by a specialty organization for the ASC's medical staff as appropriate?	Survey Procedures: §416.45(a)	Policy and Procedure Documentation	YES
Does the ASC maintain documentation of other training or pertinent experience for its medical staff?	Survey Procedures: §416.45(a)	Policy and Procedure Documentation	YES
Is there documentation of a recommendation by qualified medical personnel concerning the practitioner, "s competence in the ASC's records?	Survey Procedures: §416.45(a)	Medical Staff Privileges and Accountability	YES
Are the scope of the privileges granted to each practitioner documented by the ASC?	Survey Procedures: §416.45(a)	Medical Staff Privileges and Accountability	YES
If the governing body granted privileges against the recommendation of the qualified medical personnel, is the rationale for doing so documented?	Survey Procedures: §416.45(a)	Medical Staff Privileges and Accountability	YES
Does the review of each practitioner,"s record provide evidence that they are legally and professionally qualified to exercise the privileges granted them by the ASC?	Survey Procedures: §416.45(a)	Medical Staff Privileges and Accountability	YES
Are medical staff privileges periodically reappraised by the ASC?	§416.45(b) Standard: Reappraisals	Clinical Privilege Reappraisal	YES
Is the scope of procedures performed in the ASC periodically reviewed and amended as appropriate?	§416.45(b) Standard: Reappraisals	Clinical Privilege Reappraisal	YES
Does the ASC's governing body actually conduct a process for reappraising the medical staff privileges granted to each practitioner?	§416.45(b)	Clinical Privilege Reappraisal	YES
Does the ASC's governing body actually perform the reappraisal of medical staff privileges at least every 24 months?	§416.45(b)	Clinical Privilege Reappraisal	YES
Does the actual reappraisal process include a review of the practitioner's current credentials?	§416.45(b)	Clinical Privilege Reappraisal	YES
Does the actual reappraisal process include a review of the practitioner,"s ASC-specific case record?	§416.45(b)	Clinical Privilege Reappraisal	YES

Control Question	Source	Section	Desired Response
Are emergency transfers to hospitals actually considered in the practitioner,Äôs ASC-specific case record during reappraisal?	§416.45(b)	Clinical Privilege Reappraisal	YES
Are post-surgical infection rates actually considered in the practitioner,Äôs ASC-specific case record during reappraisal?	§416.45(b)	Clinical Privilege Reappraisal	YES
Are other surgical complications actually considered in the practitioner,Äôs ASC-specific case record during reappraisal?	§416.45(b)	Clinical Privilege Reappraisal	YES
Does the ASC’s governing body actually use a similar process for periodic reappraisal as it used when initially granting privileges?	§416.45(b)	Clinical Privilege Reappraisal	YES
Does the ASC’s governing body actually decide whether to continue, amend, or withdraw the practitioner,Äôs privileges after reappraisal?	§416.45(b)	Clinical Privilege Reappraisal	YES
Is a reappraisal actually required any time a practitioner seeks to perform procedures outside the scope of previously granted privileges?	§416.45(b)	Clinical Privilege Reappraisal	YES
Has the ASC developed actual triggers for reappraisal of privileges outside the periodic reappraisal schedule?	§416.45(b)	Clinical Privilege Reappraisal	YES
In the case of an ASC with a sole governing body member who is also a medical staff member, is seeking the recommendation of outside qualified medical personnel for reappraisal actually advisable?	§416.45(b)	Clinical Privilege Reappraisal	YES
Does the ASC actually periodically reappraise all practitioners granted clinical privileges?	Survey Procedures: §416.45(b)	Clinical Privilege Reappraisal	YES
Does the ASC’s leadership actually re-evaluate the professional qualifications of practitioners with privileges to practice in the ASC?	Survey Procedures: §416.45(b)	Clinical Privilege Reappraisal	YES
Are personnel records for practitioners with privileges in the ASC actually reviewed to ensure reappraisal within the specified timeframe?	Survey Procedures: §416.45(b)	Clinical Privilege Reappraisal	YES