

DNV GL Healthcare	ADVISORY NOTICE	Notice No: 2016-HC10
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These Advisory Notices are designed to provide you, our client, with information relative to Accredited Management System Certification activities. Should you have any questions about the content of this notice, please contact our office for further information.

DATE: July 26, 2016

SUBJECT: Position Statement: Procedures that require a postoperative/post procedure note

DISTRIBUTION: All DNV GL Healthcare Customers, Employees, and Sub-contractors

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Position Statement: Procedures that require a postoperative/post procedure note

Introduction:


The CMS definition of surgery (found in the CMS State Operations Manual for Hospitals Interpretive Guidelines at §482.51) has led to various interpretations as to what types of procedures require a postoperative/post procedure note. The topic has been debated among AOs, with CMS, and other related parties. DNV GL offers the following clarification and plans to further address this clarification in future revisions of the NIAHO® Accreditation Requirements.

Statement:

CMS, consistent with ASA guidelines, does not define moderate or conscious sedation as anesthesia (71 FR 68690-1).

The rationale for the postoperative/post procedure note is to communicate the patient's condition before transfer to the next level of care (next provider). To clarify the NIAHO® requirements of SS.8:

All surgeries or invasive procedures that require anesthesia services (excluding minimal or moderate sedation or topical analgesics, which are not considered to be "anesthesia") require an operative report or a postoperative/ post procedure note if the operative report is not immediately available.



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The intent of the immediate operative report or postoperative/post procedure note is to ensure that the next provider of care has the information necessary to make further appropriate care decisions.

The hospital may, in some circumstances, choose to require a postoperative/post procedure note in other settings or for specific high risk procedures when anesthesia services are not required. For example, at the discretion of the Medical Staff, a hospital may, following a risk based assessment, choose to require a postoperative/post procedure note for:

- Any procedure requiring moderate sedation outside of the surgical setting (e.g., endoscopy)
- Other identified high risk procedures

If such determinations were made, the expectation is that the requirements would be delineated in the Medical Staff Rules and Regulations and applied accordingly.

A postoperative/post procedure note would not generally be expected for bedside procedures or in other settings (e.g., Emergency Department) where a patient would be transferred home.

7/26/2016