

Securing Anesthesia Drugs and Locking of Anesthesia Carts Addendum

In reading through the relevant section of the Federal Register and the reply written to the Connecticut Department of Public Health by Sharon Robertson, RN of CMS, I have suggested the following scenarios. Taken together, they nicely summarize the actual status of most every hospital OR suite over the course of days, nights and weekends. Please advise me if this is a proper analysis:

Scenario A: The operating room suite is actively in use and is staffed by authorized personnel. Some OR's have patients undergoing surgery. Other OR's are either being prepared to receive a new case or have recently completed a case and are in the process of being 'turned over'. Still other OR's are being set up for potential emergencies or other cases expected to start later in the day. In this setting, the non-controlled drugs would not have to be locked in carts.

Scenario B: There are no active cases in the operating rooms. However, the operating suite is not 'closed'. It is actively staffed with OR nurses and other authorized personnel who are present in the OR suite and are available for emergency cases. The non-controlled drugs would not have to be locked in carts.

Scenario C: There are no cases in the OR's and staff are either 'on call' from outside the hospital or are assigned to other responsibilities in other parts of the hospital. The OR suite is 'closed' and contains no authorized personnel. In this situation, the non-controlled drugs must be inside locked carts.

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