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Quality Management Systems and the Challenge of Moisture Events

Richard Schule, Director Clinical Education

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Richard W. Schule MBA, BS, CST, FAST, CRCST, CHMMC, CIS, CHL, FCS, AGTS, ASQ CQIA Director Clinical Education



How Well Does Your Department Support Patient Safety..?



Evolution of Steam Sterilization





Steam Sterilization



Objectives

- Discuss the importance of periodic device testing as it applies to quality systems and patient safety.
- Identify standards and documents in the industry supporting periodic device testing.
- Explain the methods and attributes used to identify product families.
- Demonstrate documentation supporting good quality management systems.

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Terms and Definitions

- Installation Qualification (IQ)
- Operational Qualification (OQ)
- Performance Qualification (PQ)







- To ensure that the combination of product families does not create a greater sterilization challenge than set by the individual product families.
- To ensure all requirements are met.
- To *consistently* provide products that *meet requirements*.
- Understanding and controlling the processes is key to managing them effectively.

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Quality Program

- ANSI/AAMI ST79, Section10.9 speaks to periodic product quality assurance testing of routinely processed items
- Major changes made in
 - Packaging
 - Wraps
 - Load configuration
 - Dimensional
 - Weight
 - Type of material of packaging or wrap

Quality Management Systems

- Introducing systematic structure to achieve better control of processes and help focus on meeting objectives.
- Review requirements pertaining to CSSD.

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ISO 9001	ISO 17665
American National Standard	The FDA and Worldwide Dealby System
ANSI/AAMI/ ISO 13465 2003/(R)2009 Mahatanan Unity	Requirements Guidebook for Medical Devices
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Standards



AAMI Standards Then and Now

<u>Before</u> AAMI ST8: 2001 – less process control

- Jacket 4-6 °above chamber temperature
- Chamber temp 285°F or greater during conditioning
- Chamber temp range during sterilize -2→+2° F (268-272°F)
- <u>After</u> AAMI ST8: 2001 strict control
 - Jacket temperature controlled at no greater than sterilize temperature 270 °F
 - Chamber temperature range during sterilize - 0→+3° F (270-273°F)



Cycle Differences

Typical Pre-vacuum Cycle Graphs



Increasing Complexity





Pretreatment(s) Equally Important



ISO/TS 17665-3

 Care should be taken to ensure that the <u>combination of</u> <u>product families</u> <u>does not create a</u> <u>greater challenge</u> than that set by the individual product families.



Scope of Docoument

 Provides guidance about the attributes of a medical device to be considered by the user when assigning a medical device to a product family.



Terms and Definitions

- Master Product medical device or procedure set used to represent the most difficult to sterilize item in a product family or processing category.
- **Processing Category** collection of different products or product families that can be sterilized together.

Terms and Definitions

 Steam Penetration Resistance – challenge to a sterilization process from a medical device, including any sterile barrier/packaging system that may delay attainment of the process parameters for moist heat sterilization on all parts of the medical device.

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General Attributes

Table 1 — General attributes

Attribute	Code
Design	а
Weight	b
Material	С
Sterile barrier system	d



Device Design (a)

Table 2 — Design

Structure	Code	Example
	(a)	
Solid, hollow	1	Bowl, jug, dish, bottle, chisel, single piece skin retractor, single component empty instrument tray
Pin and box joints	2	Scissor, forceps, needle holder
Lumen	3	Laparoscopic sheath, sucker, cannulated reamer, rigid endoscope, cannulated screws
Porous	4	Linen, filters, gauze
Tubing, moving parts, tortuous paths	5	Power tool hose, silicone tubing, dental hand piece, ear nose throat drill,
Lumen surrounded by a large mass	6	Drill, cannulated screw driver, obturator, ratchet handle, bored handle
Other	7	Pre-filled syringe





Device Composition (b)

Table 3 — Materials

Material	Example material	Code
		(b)
Metal	Stainless steel, carbon steel copper and copper- based alloys. Other metals or combinations of metal.	1
Non-metal	Glass, cellulose, polycarbonate, PVC, PTFE, silicon. Other non metals.	2



Device/Tray Weight (c)

Tab	le	4	_	W	'ei	g	ht
	_				_	0	

Weight g	Code (c)
Less than 50	1
50 to 499	2
500 to 1999	3
2000 and greater	4



Sterile Barrier / Packaging

Table 5 — Sterile barrier system and/or packaging system

Code
(d)
1
2
3
4
-



Product Family (pf)

MD									Att	ribute										St	tean re	1 per esist	netr tanc tate(atio e d)	n	
PF				Des (;	sign a)				Mat (terial [b]		Wei (c	ght :)		Ste sys 1	erile stem pack: sys (barr and, agin; tem d)	ier /or g				(e	.)			
	1	2	3	4	5	6	7	+	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	6	7	
1	x								x		x	x	x		x				x							E
2	x								x					x	x					x						
3	x									x	x	x	x		x					x						
4	x									x				x	x						x					I
5	x								x		x	x	x			x				x						1
6	x									x	x	x					x	x			x					1
7	x	Γ		Ē			<u> </u>	<u> </u>		x	Ē		x	x		x	x	x				x	Ē	Ē	<u> </u>	
8			x						x		x	x			x	x	x	x			x					
9			x						x				x	x	x	x	x	x				x	Ē	Ē		
10		Γ	x	Ē						x	x	x		Ē	x		<u> </u>				x	Ē	Ē	ĒIJ	<u> </u>	
11			x							x	x	x				x	x	x				x				
12	1		x							x			x	x		x	x	x					x	ĒIJ		1
13				x						x	x				x	x					x	\square				1
14	_			x						x	x						x	x				x				
15		_		x				<u> </u>		x		x	x	x			x					\square	x			1
16		x							x		x				x					x						1
17	1	x							x		x			Ē			x	x			x			Ē		
18	_	x								x	x				x					x		\square				1
19		x								x	x					x	x	x			x			Ľ		
20	1				x				x		x			Ē	x							x		Ē		
21				1	x				x		x	x			1 1	x	x	x	1			1	x	(-1)	1	



Attrik	uite

Material (b)

Ma (terial (b)			
			Table 3 — Materials	
1	2	Material	Example material	Code
x			2	(b)
	x	Metal	Stainless steel, carbon steel copper and copper-	1
x	×		based alloys. Other metals or combinations of metal.	
	x	Non-metal	Glass, cellulose, polycarbonate, PVC, PTFE, silicon.	2
~	x		Other non metals.	
×				
	x			17 40 C
	x			19
	x			
	x			1 Andrew
	x			200
	x		Carl Ball	
х				

	We (0	ight :)		Weight	(C)
1	2	3	4		
^	Ê		x	g	(c)
x	x	x	x	Less than 50 < 1.76 oz.	1
x	x	x		50 to 499 1.76 – 17.60 oz. (1.1)	2
x	×	x	x	500 to 1999 17.64 – 70.51 oz. (4.4)	3
x	x			2000 and greater > 70.55 oz.	4
x x	x x	x x	x		
x x	x	x	x	· 10000	3000

Ste syst pa	rile tem ack <i>a</i> syst (d	barr and aging em	ier /or J	Sterile Barrier System Table 5 — Sterile barrier system and/or packaging system Sterile barrier system	(
1	2	3	4	(d)	
x				Nono 1	1
x					-
x				Single wrapped/pouch 2	
×	x	x	x	Double wrapped in wrapping material or 3 pouches, double wrapped container or tray, reusable sterilization container according to manufacturers instructions	
x	x	x	x	Combination of two or more systems, for 4	
x	x	x	x	example, a reusable sterilization container	
x				with an inner sterne barrier system	
	х	x	x		
	х	x	x		-
х	х				
		x	x		
		x			I

Product Family (pf) (cont')

MD		Attribute										Steam penetration resistance (estimated)														
PF		Design (a)							Material (b)		Weight (c)			Sterile barrier system and/or packaging system (d)			(e)									
	1	2	3	4	5	6	7	+	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	6	7	Γ
22					x					x	х	x			x								x			Γ
23					х				х				x	x		x	х	x					х			Γ
24					x					x	x	x				x	x	x					x			Γ
25					х					x			х	х		х	х	х					х			
26						x			x	x			x	x		x	x	х						х		
27						x			х			x	х		х	x	х	х					x			Г
28						x				x		x			х	x	х	х						х		Γ
29a							х		x	x															x	Γ
+																										F

Example One

Design: a1

Material: **b1**

Weight: c1

Sterile barrier system and/or packaging system: **d1**

Product Family (pf) 1

Example Two

Design: a5

Material: **b2**

Weight: **c1**



Sterile barrier system and/or packaging system: **d3**

Product Family (pf) 24

Example Three

Design: a6

Material: **b2**

Weight: c2



Sterile barrier system and/or packaging system: **d3**

Product Family (pf) 28

General Orthopaedic Tray



Analysis General Orthopaedic Tray

Attribute	Description	Code	Steam penetration resistance (estimated)
General description	Large number of different types and weights of instruments assembled onto a tray liner in a metal tray. Double wrapped with nonwoven wrapper x2		e5
	Total weight approximately 8 000 g		
Design	Solid	a1	e1
	Perforated aluminium tray	a1	e1
	Pin/box joint	a2	e2
Material	Stainless steel	b1	e1
Weight	50 g to 800 g	c1	e1
		c2	e1
		c3	e1
Sterile barrier system and/or packaging system	Single use 2 ply wrapper	d3	e3

Product family – Classification Based on Estimates: General Orthopaedic Tray



Table B.13 — Product family — Classification based on estimates: General orthopaedic set

Surgical Back Table Set-up



Master Product/Family Member

• Assessment for complex orthopaedic sets.



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Risk assessment

	A LESS				н	azard Sca	le	
- 550			-	5	4	3	2	1
	1			Death ortotal systems loss	Major Injury or illness	Lost Time, Injury or illness	First Aid Incident	Very Minor, Little Consequence
	-	110		Catastrophic	Critical	Serious	Marginal	Negligible
	5	Likely to Occur frequently	Frequent	25 = Re-think	20 = Re-think	<mark>15 = Re-think</mark>	10 = Reduce	5 = Inform
ä	4	Likely to occur several times	Probable	20 = Re-think	<mark>16 = Re-think</mark>	12 = Reduce	8 = Reduce	4 = Inform
d Scale	3	Sometimes	Occasional	15 = Re-think	12 = Reduce	9 = Reduce	6 = Inform	3 = Inform
lihood	2	Unlikely but Possible	Remote	10 = Reduce	8 = Reduce	6 = Inform	4 = Inform	2 = No Action
Like	1	Very Unlikely Assumption that it will never occur	Improbable	5 = Inform	4 = Inform	3 = Inform	2 = No Action	1 = No Action







Performance Qualification

- Installation of sterilizer
 Installation checklist
- Operation of sterilizer
 Bowie Dick testing
 - BI/Challenge pack
- Performance of sterilizer
 Instrument set testing





Document for Effectiveness

Device Testing Documentation



- Clearly written/typed ٠
- Visual
- Electronically sent •
- Eliminates guess ٠ work
- One page with a wealth of information

Quality Systems

- Documenting is critical when assessing moisture related issues
- · Standardizing on the worst case scenario
- CAs/PAs (improvement)
- Trending (analysis)

(ray WL	Campany	Device Name	Tray Layout	OEM IFU	Sterifization	Comments
U.S./Metric	and the second	All second and the	and the second second second	(OneSource)	Dry Time	a state of the second
		1				
			14.5			
				-		
				-	-	
				-		
				-		
Co. Economica II.	cuital Oceher	Canada				/ //
St. Eussache Hi	Test Lord Des	Continue				p
	1 VIII C/20 DE1					



8.2 Monitoring and Measurement

- Customer satisfaction
- Internal audits
- Monitoring and measurement of processes
- Monitoring and measurement of product



What are You Doing To Improve?

10 Things Your Organization 10 Things Your Organization Can Do Now to Improve Reprocessing Can Do Now to Improve Reprocessing This top 10 list emerged from the presentations, audience discussions, and follow-up input to AAMI. It is intended to be inspiring, and serve as a refresher on some of the basics. It does not take the place of standards, regulations, or internal policies, nor is it intended to suggest a standard of care. While some priority liens from the summit will take time to address, we want everyone to know that there are at least 10 things that an organization can begin to do immediately, without waiting for other actions, such as long-term standards and research. This top 10 is emerged from the presentations, audience discussions, and follow-up input to AAM. It is intended to be inspiring, and serve as a refresher on some of the basis. It does not take the place of standards, regulations, or internal policies, nor is it intended to suggest a standard of care. While some priority items from the summit will take time to address, we want everyone to know that there are at least 10 things that an organization can begin to do immediately, without waiting for other actions, such as long-term standards and research. The basics: Standards matter: Cleaning and disinfection/sterilization of reusable devices are separate, equally 6 Know the current standards, recommended practices, and IFU. important processes and must be performed before each patient use according to the device manufacturers' written instructions for use (IFU). For more Purchasing: information go to www.fda.gov/MedicalDevices/Safety/AlertsandNotices/ucm190273.htm 7 Central sterile processing should be included in purchasing decisions for medical devices, to provide input on whether the device can be reprocessed appropriately and with the facility's existing resources. The right tools: 2 The right tools: Have the IFU as well as all cleaning implements and equipment required by the IFU readily available in all the reprocessing areas. Separate and standardize functions and locations: Separate central service (warehouse, stocking, etc.) from reprocessing; create standardized job descriptions and functions. 8 Create a multidisciplinary committee: 3 To review the priority issues and set at plan for solving them throughout the organization. The following areas should be represented: OR, infection prevention and control, healthcare technology management (biomed), endoscopy, risk management, quality, safety, education, and materials management. Training: 9 Train, train, and retrain. Ideas include: assess staff competencies; nego for training budget with cost/benefit analysis to prove value; partner with vendors for education; create a list of available continuing education units (CEUs) for easy access by staff; work with human resources to create management. Share lessons learned: 4 Share lessons learnea. Remind serior management and safety officers that it costs a lot less to 'do it right the first time. 'Share lessons learned from other healthcare organizations that have had to inform patients of exposure to inadequately reprocessed reusable devices. career ladders for certification and promotion; promote the importance of certification. Note: In-service for loaner or new instruments should include reprocessing in-service areas that are separate from (or in) central sterile reusable devices. 5 Written procedures: 5 Establish a formal program for reprocessing, including written standardized policies and procedures that include a chain of accountability. Expert guidance can be obtained from industry experts in order to resolve conflicts between the IFU and facility policies. Written procedures should also be developed and implemented for central sterile processing reporting of inadequate instructions, equipment problems, and in-service issues to the manufacturer and, when applicable, to the FDA's MedWatch program. processing. 1000-ssing. 10 Assessment: Conduct an audit of compliance with standards and regulations, using any number of available tools and resources. See References and go to: www.fda.gov/MedicalDevices/ DeviceRegulationandGuidance/ReprocessingofReusableMedicalDevices/uc m2522941.htm.

ANSI/AAMI ST90

New ANSI/AAMI document specifies minimum requirements for quality management systems (QMS) where an organization needs to demonstrate its ability to effectively, efficiently, and consistently reprocess (clean, decontaminate, disinfect, sterilize) reusable medical devices in order to prevent infections, pyrogenic reactions, or other adverse patient events.



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Improve							
Processing							
with							
ISO 13485							

10 Things		ISO 13485						
To Improve Reprocessing		Supporting Requirement(s)						
1. The basics	5.4.1	Quality objectives						
	6.3	Infrastructure						
	7.2.2	Review of requirements related to the product						
2. The right tools	4.2.3	Control of documents						
	7.2.2	Review of requirements related to the product						
3. Create a multidisciplinary	5.1	Management commitment						
committee	5.2	Customer focus						
	5.6.2	Management review input						
	6.3	Infrastructure						
4. Share lessons learned	5.5.3	Internal communication						
	7.2.3	Customer communication						
	8.5.2	Corrective action						
	8.5.3	Preventive action						
5. Written procedures	3.0	Terms and definitions						
	4.2	Documentation requirements						
	4.2.3	Control of documents						
	4.2.4	Control of records						
6. Standards matter	4.2	Documentation requirements						
	4.2.3	Control of documents						
7. Purchasing	7.4.1	Purchasing process						
	7.4.2	Purchasing information						
	7.4.3	Verification of purchased product						
8. Separate and standardize	1.0	Scope						
functions and locations	6.4	Work environment						
9. Training	6.2.2	Competencies, awareness and training						
	6.4	Work environment						
10. Assessments	6.4	Work environment						
	8.2	Monitoring and measurement						

ISO 13485



- Greater emphasis on the use of procedures to regulate and control how activities and processes should be performed.
- More prescriptive whereby insisting on the use of formal procedures.

AAMI Publications

- Corrective and Preventive Action (CAPA)
 - Implementation
 - Controlling non-conforming products
- Management Responsibility
- Quality Audits



Action Plan

- Identify external resources and references used to support department systems, policy and procedures, specifically periodic device testing.
- Research and develop your department's periodic device testing procedure and work instructions.
- Identify and place your medical device tray(s) in one of the product families.

Action Plan

- Document for effect.
- Document to achieve sustainable reproducible results.
- Establish and implement performance qualification testing.
- AAMI/FDA 2011 Summit "to do" list, how does your department measure up?
- Make patients safer by delivering quality products and services.

Identify Wet Pack Resources



Quick Response Wet Pack Resolution Workbook

The key to a quick wet pack resolution:

- Thorough documentation by all stakeholders to include:
 - Meeting minutes
 - Assigned actions items
 - Follow-up & conclusion
- Forms located at end of the Workbook



References

- Bauer, J.E., Duffy, G.L., Westcott, R.T., The Quality Improvement Handbook, 2nd Edition, 242 pages. ASQ Quality Press, Milwaukee, WI 2006. Purchase from <u>www.asq.org</u>.
- International Standard ISO 13485 Medical devices – Quality management systems – Requirements for regulatory purposes, Second edition 2003-07-15, 65 pages. Purchase from <u>www.aami.org</u>.

References

- Juran, J. M., De Feo, J.A. Juran's Quality Handbook – The Complete Guide to Performance Excellence, 6th Edition, 1168 pages. McGraw-Hill New York NY 2010. Purchase from <u>www.asq.org</u>.
- Swenson, D., Basic Concepts in Sterilization Processes Verification, Validation, and Qualification, 114 pages. Association for the Advancement of Medical Instrumentation, Arlington, VA. Purchase from <u>www.aami.org</u>.

References

- http://www.aami.org/publications/summits/20 11_Reprocessing_Summit_publication.pdf
- International Organization for Standardization ISO/TS 17665-3:2013 (E) Sterilization of health care products – Moist heat – Part 3: Guidance on the designation of a medical device to a product family and processing category for steam sterilization, 51 pages. Purchase from <u>http://webstore.ansi.org</u>.



Questions

