

November 17, 2008

Roger A. Moore, MD  
American Society of Anesthesiologists  
520 N. Northwest Highway  
Park Ridge, IL 60068-2573

Deborah A. Lawson, AA-C  
American Academy of Anesthesiologist Assistants

Re: Anesthesia Carts

Dear Dr. Moore and Ms. Lawson,

I am responding to your letter of October 22, 2008 and on behalf of Dr. Chassin.

Your understanding of the CMS regulations in regards to the security of medications as defined in the Federal Register, published November 27, 2006 and effective January 26, 2007 is correct. The Joint Commission adopted the CMS definition and approach on that date as well and our surveyors were instructed at that time.

During the survey process, our surveyors would expect to see your organization's policy and procedure being followed in terms of medication security throughout the organization. Of course, this includes scheduled drugs being appropriately locked as defined by CMS as well.

Please do not hesitate to contact me if you have further questions or if I can be of any assistance.

Sincerely,



Pat Adamski, RN, MS, MBA  
Director, Standards Interpretation Group and the Office of Quality Monitoring

C: Dr. Chassin  
Dr. Wise  
H. Bressler