

**Indiana State Department of Health
Health Care Quality and Regulatory Services
Division of Acute Care**

**Certified Surgical Technologists and Certified Surgical First Assistant Performing
Vein Harvesting Intra-Operatively**

ISDH HCQRS: Program Advisory Letter

Number: **AC-2011-02 HOSP**

Effective Date: August 01, 2011

Created: August 01, 2011

Cancels: None

Reviewed: n/a

Revised: September 09, 2011

ADVISORY SUMMARY

- **Revision of September 09, 2011 changes:**

Certified Surgical Assistants may not perform vein harvesting, to;
Certified Surgical Technologists may not perform vein harvesting.
[Page 5: Policy, line two]

- **Effective Date: August 01, 2011**

- **The scope of practice for Certified Surgical Technologist (CST) does not provide for the performance of vein harvesting.**

- **The scope of practice for Certified Surgical First Assistant (CSFA) does permit the performance of vein harvesting.**

- **Indiana Health Care Facilities may permit vein harvesting by Certified Surgical First Assistants but not Certified Surgical Technologists.**

- **A facility that permits the Certified First Assistant to harvest veins intra-operatively must provide for such activity per the facility's credentialing criteria and must ensure that the Certified First Assistant's certification is valid and active.**

Background:

The Indiana State Department of Health (ISDH), Acute Care Division has been made aware that some Indiana Health Care Facilities employee staff who are either Certified Surgical

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Technologists (CST) and/or Certified Surgical First Assistants (CSFA) in the provision of services within the operative room. In addition the Indiana State Department of Health is aware that some facilities are (or have) permitted the certified surgical technologist to perform intra-operative vein harvesting. The result of this activity has been the issuance of survey citations to those facilities utilizing certified surgical technologist for the aforementioned procedure. As a result of the informal dispute resolution process, the Indiana State Department of Health underwent a review and analysis of the role of the certified surgical technologist and certified surgical first assist in order to determine if the citations were appropriate. The analysis and conclusions (resultant policy statement) are as follows:

Analysis:

NATIONALLY RECOGNIZED POLICY STATEMENTS

The Association of Surgical Technologists (AST) Board of Directors adopted a “Position Statement Harvesting of the Saphenous Vein by the CFA” in April 2008. The statement reads in part:

“Therefore, it is the position of AST that the individual, who has attained the credential of CFA, has the knowledge and experience to perform those tasks as related to the intra-operative harvesting of the saphenous vein to contribute to quality surgical patient outcomes.”

[Note: The Association of Surgical Technologists statement issued in 2008 uses “CFA.” (certified first assistant). Since that time, the acronym was changed to “CSFA” (certified surgical first assistant) to avoid conflict with certified financial advisor.]

The Association of Surgical Technologists offers no such position statement for certified surgical technologists.

The language in the 2011 certified surgical technologist candidate handbook from the National Board of Surgical Technology and Surgical Assisting (NBSTSA) states at B1; “Provide intra-operative assistance under the direction of the surgeon”

The 2011 certified surgical first assistant candidate handbook states at B5; “Perform advanced intra-operative functions as directed.”

Note the words “provide intra-operative assistance” and “perform advanced intra-operative functions.” This language implies a lower level of activity (provide assistance (e.g. to help) for

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the certified surgical technologist and a higher level (perform, advanced, functions) for the certified surgical first assistant.

Finally, the National Board of Surgical Technology and Surgical Assisting clearly intends to differentiate the certified surgical technologist from the certified surgical first assistant by the presence of two distinct educational paths and two distinct examinations administered by the National Board of Surgical Technology and Surgical Assisting of which the certified surgical first assistant appears as the more complex of the two resulting in a higher level of certification.

STATE STATUTE REVIEW

IC 25-36.1-1-1

Certified surgical technologist

Sec. 1. An individual may not:

- (1) profess to be a certified surgical technologist; or
 - (2) use the initials "CST" or any other words, letters, abbreviations, or insignia indicating or implying that the individual is a certified surgical technologist;
- unless the individual holds and maintains the Certified surgical technologist Credential administered by the National Board of Surgical Technology and Surgical Assisting (NBSTSA).

Based upon the language at 25-36.1-1-1, Indiana recognizes certified surgical technologist but not certified surgical first assistants. Therefore, the language in Article 25-36.1 applies only to individuals with certification as a surgical technologist and in so doing defines what activities, functions, interventions or acts the certified surgical technologist may perform.

IC 25-36.1-2-4 Licensed practitioners acting within scope of practice not prohibited.

Sec. 4. This chapter does not prohibit a licensed practitioner from performing surgical technology functions if the practitioner is acting within the scope of the practitioner's license.

The term 'practitioners' is defined in numerous State statutes and rules. However, the Indiana State Department of Health cannot locate any definition that includes certified surgical technologist or certified surgical first assistant. A reasonable interpretation of IC 25-36.1-2-4 is that physicians, dentists and podiatrists, acting within the scope of an unlimited license, are not prohibited from performing surgical technology as defined at IC 25-36.1-3. The Indiana State Department of Health is unaware of any other practitioner for whom surgical technology would be included within their scope of practice

IC25-36.1-2-3 "Surgical technology"

Sec. 3. As used in this chapter, "surgical technology" means intraoperative surgical patient care that involves the following:

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- (1) Preparing the operating room for surgical procedures by:
 - (A) ensuring that surgical equipment is functioning properly and safely; and
 - (B) preparing sterile supplies, instruments, and equipment using sterile technique.
- (2) Anticipating the needs of the surgical team based on knowledge of human anatomy and pathophysiology relating to the surgical patient and the patient's surgical procedure.
- (3) Performing tasks in an operating room setting in the sterile field, including the following:
 - (A) Passing supplies, equipment, or instruments.
 - (B) Suctioning or sponging an operative site.
 - (C) Preparing and cutting suture material.
 - (D) Transferring and irrigating with fluids.
 - (E) Transferring, without administering, drugs within the sterile field.
 - (F) Handling specimens.
 - (G) Holding retractors.
 - (H) Assisting in counting sponges, needles, supplies, and instruments with an operating room circulator as allowed under section 6 of this chapter.

While some providers interpret the statutory language found at IC 25-36.1-3 to allow for vein harvesting by a certified surgical technologist, the Indiana State Department of Health does not find any language in the statute that addresses any intervention, function, procedure, act, duty or assistance related to human tissue.

In addition, there is no statutory language that permits a certified surgical technologist to perform advanced procedures by the acquisition of additional education or training. This is also consistent with the Association of Surgical Technologists. The association does not appear to offer any education or training to the certified surgical technologist other than what is required to obtain the advanced certification of certified surgical first assistant.

Summation:

1. Nationally recognized policy delineates certified surgical technologist from certified surgical first assist.
2. Nationally recognized policy explicitly permits harvesting by a certified surgical first assist.
3. Nationally recognized policy does not authorize harvesting by a certified surgical technologist.
4. State statute does not authorize any activity related to any intervention, function, procedure or assistance related to human tissue for the certified surgical technologist.

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Policy:

Certified Surgical First Assistants may perform vein harvesting pursuant to their certification.
Certified Surgical Technologists may not perform vein harvesting.
Facilities should have in place, properly approved credentialing policies and procedures indicating that the CSFA is permitted to harvest veins in the operative theatre.

Questions:

Questions about this program advisory letter may be addressed to Ann Hamel, Program Director, (317) 233-7487, email: ahamel@isdh.in.gov or Randy Snyder, Division Director, (317) 233-1286, email: rsnyder1@isdh.in.gov.

Approved by:

/s/

Terry Whitson, Assistant Commissioner
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