Ramping up Single Use Device (SUD) Reprocessing



"intended for use on one patient during a single procedure" - FDA SINGLE USE DEVICE (SUD) = (ex = *Ligasure* cautery, laparoscopic trocars, disposable bronchoscopes)

1970's:

Hospitals start reprocessing SUD's with their own sterilization equipment

1990's:

Hospitals shift toward 3rd party reprocessors

2002:

Medical Device User Fee and Modernization Act

MEDICAL DEVICE USER FEE AND MODERNIZATION ACT

- Established FDA regulatory authority over 3rd party SUD reprocessors, assigning them liability
- Funded by annual 3rd party fees
- Designates devices to be reprocessed and frequency
- Requires labeling of reprocessed SUD's
- Repeatedly re-authorized (most recently in 2022)



Significant potential financial savings from reprocessing SUD's:

Both from collecting used devices for reprocessors AND buying reprocessed devices instead of new



IDENTIFY A TARGET PROCEDURAL SPACE

(e.g. OR pod, endoscopy suite)



DEFINE YOUR GOAL

Collect SUD's for reprocessing? Buy reprocessed SUD's for use in your system? Both?



SELECT SUD'S

Solicit input from both clinicians and your purchasing team



WORK WITH STAKEHOLDERS FOR APPROVAL AND IMPLEMENTATION

including clinicians, nursing, purchasing, infection control, environmental services, engineering



DRAFT HOSPITAL POLICY FOR **NEW SUD WORKFLOW**

Ensure compliance with Joint Commission Standard PCI 7.1

THIRD PARTY REPROCESSORS

Arjo ReNu **Cardinal Health Innovative Health Medline ReNewal NEScientific** Stryker **Suretek Medical**

!\ CHALLENGES



SOLUTIONS

Complex regulatory issues

- Work with third party reprocessors who have been validated by the FDA & assume liability
- Read Instructions for Use (IFU's) for reprocessed SUD's; may have limitations

Clinician concerns regarding safety

- Provide education on FDA oversight
- Collaborate with Infection Control team

Inhibitory riders on purchasing contracts preventing collection & purchase of reprocessed SUD's

- Evaluate contracts with purchasing team
- Flag inhibitory language and negotiate to eliminate such terms in future contract negotiations



RESOURCES



Commission White Paper Reprocessing (2017)



*Association of Medical Device Reprocessors (AMDR)



ASC Quality Collaborative SUD Reprocessing

BENEFITS

- Participating facilities have preferential access to buy reprocessed SUD's when supply chain shortages limit access to new devices
- 20 million tons diverted from medical waste in 2021 *
- More than **\$400** million saved by hospitals and surgical centers reprocessing SUD's in 2021 *

USEFUL



Toolkit

WWW.PGSSC.ORG/ COASTHOTTOPICS