

TENNESSEE CENTRAL SERVICE TECHNICIAN LAW

FREQUENTLY ASKED QUESTIONS

******* Please note: *The International Association of Healthcare Central Service Materiel Management (IAHCSMM) provides the information in this document for informational purposes only and does not offer legal advice. IAHCSMM recommends that individuals or healthcare facilities consult with their attorneys for answers to legal questions. The information in this document should not be considered complete or exhaustive and may not reflect the most current information. As a result, IAHCSMM does not represent that the information in this document is complete, accurate and up to date.* *******

1) What does the Tennessee Central Service technician law require?

The Tennessee Central Service technician law requires new Central Service technicians to be certified and all Central Service technicians to maintain continuing education credits. Certain individuals are grandfathered in and do not have to be certified (“grandfathering” is a provision in which an old rule continues to apply to some existing situations, while a new rule will apply to all future cases). The law requires ten (10) hours of continuing education for all practicing Central Service technicians annually (even for those who were grandfathered in).

2) Which healthcare institutions are required to have certified Central Service technician?

Hospitals and ambulatory surgical treatment centers are required to have newly hired Central Service technicians certified; however, these healthcare institutions are subject to other conditions. Please see other questions below.

3) May a person who was employed as a non-certified Central Service technician prior to January 1, 2017 switch facilities without having to get certified?

Yes, provided the non-certified Central Service technician meets the grandfathering clause requirement. To be grandfathered as a Central Service technician, a Central Service technician must provide a written request to his/her existing healthcare institution to obtain evidence of his/her employment that he/she was employed as a Central Service technician in a healthcare institution prior to January 1, 2017. Therefore, individuals who had different job titles may not switch facilities by being grandfathered in as Central Service technicians. He/she must be certified as a CRCST or CSPDT to switch facilities and work as a Central Service technician.

4) May healthcare institutions require CRCST or CSPDT as a condition of employment, even if an individual is grandfathered?

Yes.

5) Who may healthcare institutions hire as Central Service technicians?

A Central Service technician must provide evidence to his/her employer of meeting one of the following requirements:

- a) Successfully passed a nationally accredited Central Service technician exam, and holds and maintains CRCST or CSPDT; or
- b) Provides evidence of employment as a Central Service technician in a healthcare institution prior to January 1, 2017.
- c) When the law takes effect January 1, 2017, a healthcare institution may employ a person who has **not** passed the certification exam for 2 years from the date of hire. By the 2-year anniversary of the individual's hire date, he/she must obtain the CRCST or CSPDT.

4) May a healthcare institution hire a person who has not yet passed the certification exam?

Yes. When the law takes effect January 1, 2017, a healthcare institution may employ a person who has not passed the certification exam for 2 years from the date of hire. By the 2 year anniversary of the individual's hire date, he or she must obtain the CRCST or CSPDT.

5) May a healthcare institution hire a person who is not certified, but has been employed as a Central Service technician in a healthcare institution prior to January 1, 2017?

Yes. A healthcare institution may hire someone as a Central Service technician if he or she was employed as a Central Service technician in a healthcare institution prior to January 1, 2017. Healthcare institutions may require Central Service technicians to hold CRCST or CSPDT credentials.

6) What if a Central Service technician holds a CRCST or CSPDT prior to January 1, 2017 but allows his/her certification to lapse after January 1, 2017, would this person fall under the grandfather clause and not have to get recertified?

It depends. Ultimately, healthcare institution attorneys will have to determine the outcome of this. There is a provision that requires a Central Service technician to hold and maintain CRCST or CSPDT.

7) Are nurses exempt from having to be certified?

Yes, as long as a nurse is acting within the scope of his or her practice, he/she does not have to hold a CRCST or CSPDT. Also, other healthcare providers that are licensed pursuant to Title 63 of the Tennessee Code Annotated may not have to be certified if they are acting within their scope of practice.

8) Are surgical technologists exempt from having to be certified?

Yes, as long as a surgical technologist is acting within the scope of his or her practice, he/she does not have to hold a CRCST or CSPDT. Also, other healthcare providers that are licensed pursuant to § 68-11-201 of the Tennessee Code Annotated may not have to be certified if they are acting within their scope of practice.

9) Are medical sonographers exempt from having to be certified?

Yes, as long as a diagnostic medical sonographer is performing the duties as a medical sonographer, then he/she does not have to hold a CRCST or CSPDT. Also, other healthcare providers that are licensed pursuant to § 68-11-201 of the Tennessee Code Annotated may not have to be certified if they are acting within their scope of practice.

10) What other healthcare providers are exempt from having to be certified if the provider falls under Title 63 of the Tennessee Code Annotated?

If the healthcare provider is registered, certified, or licensed pursuant to Title 63 of the Tennessee Code Annotated, they may not have to be certified if they are acting within their scope of practice. Title 63 includes the physicians, osteopathic physicians, chiropractors, podiatry, athletic trainers, physical therapists, nurses, dentists, dental hygienists, optometry, respiratory care practitioners, perfusionists, pharmacists, psychologists, physician assistants, orthopedic physician assistants, martial and family therapists, social workers, master social workers, professional counselors, genetic counselors, nursing home administrators, dietitian/nutritionist, polysomnography, veterinaries, massage therapists, electrologists, audiologists, and speech and language pathologists. **Note: this list is not exhaustive.*

11) Are students or interns exempt from having to be certified?

Yes, if you are a student or intern performing the job duties of a Central Service technician under the direct supervision of a healthcare provider, you are exempt from the certification requirement.

12) What if I do not work in a Central Service department but my job is similar to a Central Service technician will I have to be certified and maintain continuing education credits?

It depends. Ultimately, healthcare institution attorneys will have to determine if your job falls under the Central Service technician law or not. There is a provision that allows for healthcare institution to determine if a person who does not work in a Central Service department has been specially trained and is deemed competent to decontaminate or sterilize reusable medical equipment, instruments or devices. This is based on standards set by a healthcare institution's infection prevention or control committee along with input from a certified Central Service technician.

If the healthcare institution determines the person who does not work in a Central Service department is competent, then the facility is required to maintain a list of those people. In addition, those people deemed competent must annually complete a minimum of ten hours of continuing education in areas related to infection control and the decontamination and sterilization of reusable medical equipment, instruments, and devices.

13) Do endoscopy professionals have to be certified and/or maintain the continuing education of a Central Service technician under this law?

This will depend on the job requirement and job description for the professional. Healthcare institution attorneys will have to determine if this profession falls under the Central Service technician law or not.

14) Will a Central Service technician earn more money now that certification is required?

This is determined by your healthcare institution and is not addressed in the law. A word of caution: Central Service professionals should be aware that asking this question (or simply bringing the topic of monetary compensation into the discussion) in the presence of state elected officials or health care executives can jeopardize our efforts in other states.

15) How does a person earn the CRCST or CSPDT?

The pathway for earning the CRCST or CSPDT is taking their respective exams. Visit www.iahcsmm.org or www.sterileprocessing.org.

16) What are the continuing education requirements?

All Central Service technicians in Tennessee must earn 10 hours of continuing education each year, even if the individual maintains CRCST or CSPDT certifications. The requirement of 10 hours of continuing education is a minimum standard, meaning certifying bodies may require individuals to maintain more than 10 hours of credit. For example, the easiest way to comply with the law and simultaneously meet IAHCSMM's requirements for the CRCST credential is to complete 12 hours of continuing education each year.

17) When do the continuing education credits become required?

The continuing education requirement becomes effective January 1, 2017. Each healthcare institution's human resources department will determine the exact date the first 10 hours of continuing education must be completed.

18) What about CBSPD's continuing education requirements?

You should contact CBSPD about how they are handling the continuing education requirements.

19) What happens to me if I do not get certified and/or attain my required continuing education credits?

After January 1, 2017, if you do not fall into the grandfathering clause, being certified is required in order to be employed as a Central Service technician in the state. All Central Service technicians, regardless of the grandfathering clause, will be required to maintain the continuing education credits. If you are grandfathered in and do not have a certification, you should talk to your human resources department about what happens if you fail to maintain the required continuing education credits.



20) Where do you send your continuing education credits in your health care facility?

Give them to your human resources department. In some cases, there are Central Service departments that are keeping them in the department.

21) Where can the text of the law be found?

Scroll down to Tennessee on this page and click on TN Central Service Technician Law:
<http://www.iahcsmm.org/advocacy/cs-state-laws.html>

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