Exhibit 351

ASC INFECTION CONTROL SURVEYOR WORKSHEET

(Rev. 84, Issued: 06-07-13, Effective: 06-07-13, Implementation: 06-07-13)

Name of State Agency or AO (please specify)

Instructions: The following is a list of items that must be assessed during the on-site survey, in order to determine compliance with the infection control Condition for Coverage. Items are to be assessed primarily by surveyor observation, with interviews used to provide additional confirming evidence of observations. In some cases information gained from interviews may provide sufficient evidence to support a deficiency citation.

The interviews and observations should be performed with the most appropriate staff person(s) for the items of interest (e.g., the staff person responsible for sterilization should answer the sterilization questions).

A minimum of one surgical procedure must be observed during the site visit, unless the ASC is a low volume ASC with no procedures scheduled during the site visit. The surveyor(s) must identify at least one patient and follow that case from registration to discharge to observe pertinent practices. For facilities that perform brief procedures, e.g., colonoscopies, it is preferable to follow at least two cases.

When performing interviews and observations, any single instance of a breach in infection control would constitute a breach for that practice.

Citation instructions are provided throughout this instrument, indicating the applicable regulatory provision to be cited on the Form CMS-2567 when deficient practices are observed.

PART 1 – ASC CHARACTERISTICS		
1. ASC Name		
2. Address, State and Zip Code	Address	
	City State Zip	
3. 10-digit CMS Certification Number		
4. What year did the ASC open for operation?	y y y y	
5. Please list date(s) / / d d	/	у
5. What was the date of the most recent previous federal (CMS) survey:	m m d d y y y y	
7. Does the ASC participate in Med <i>i</i> care via a	accredited "deemed" status? O YES O NO	
recognized accreditation O America organization(s)? O America	itation Association for Ambulatory Health Care (AAAHC) an Associate for Accred. of Ambulatory Surgery Facilities (AAAAS) an Osteopathic Association (AOA) nt Commission (TJC)	F)
7b. If YES, according to the ASC, what was the date of the most recent accreditation <i>survey?</i>	m m d d y y y y	

8. What is the ownership of the	0	Physician-ow	ned									
facility? (SELECT only ONE bubble)	0	Hospital-owr	owned									
	0	National cor	porat	tion (inc	luding	joint v	entur	es with	physic	cians)		
	0	Other (pleas	e <i>spe</i>	cify):								
9. What is the primary procedure per ASC (i.e., what procedure type reflect procedures performed at the ASC)? (Select only ONE bubble)			ASC Do I	What ad ? (<i>Selec</i> inot inclused) stion 9.	all th	at app	ly)	·			the	
O Dental			0	Dental								
O Endoscopy			0	Endosc	ору							
O Ear/Nose/Throat			0	Ear/No	se/Thr	oat						
O OB/Gyn			0	OB/Gy	n							
O Ophthalmologic			0	Ophtha	almolo	gic						
O Orthopedic			0	Orthop	edic							
O Pain			0	Pain								
O Plastic/reconstructive			0	Plastic/		structi	ve					
O Podiatry			0	Podiati	•							
O Other (please specify):			0	Other (N/A	please	e speci	fy):					
11. Who does the ASC perform procedures on? (Select only ONE bubble)	0 0 0	Pediatric pat Adult patien Both pediatr	ts on	ly	oatient	:s						
12. What is the average number of procedures performed at the ASC per month?								рє	er mon	th		
13. How many Operating Rooms (incl rooms) does the ASC have?	udinį	g procedure	O 1	O 2	O 3	O 4	O 5	O 6	O 7	O 8	O 9+	
Number actively maintained:			0	0	0	0	0	0	0	0	0	
			1	2	3	4	5	6	7	8	9+	
14. Please indicate how the following Con	serv ntrac	•		(select Othe		t appl	• •	her, <i>p</i> le	ease <i>sp</i>	ecify:		
Anesthesia/Analgesia	0	0		0								
Environmental Cleaning	0	0		0								
Linen	0	0		0								
Nursing	0	0		0								
Pharmacy	0	0		0								
Sterilization/Reprocessing	0	0		0								
,		_		_								

Waste Management		0	0	0						
INFECTION CONTROL PROG	SRAN	1			l					
15. Does the ASC have an e	xplici	t infectio	n control progra	am?	0					
NOTE! If the ASC does not have an explicit infection control program, a condition-level deficiency related to 42 CFR 416.51 must be cited.										
16. Does the ASC's infection control guidelines?	n con	trol progr	am follow natio	onally recognized in	nfection O	. =0				
NOTE! If the ASC does not follow nationally recognized infection control guidelines, a deficiency related to 42 CFR 416.51(b) must be cited. Depending on the scope of the lack of compliance with national guidelines, a condition-level citation may also be appropriate.										
16a. Is there document recognized infection co					onally- O	. =0				
for use in its infection controlling to the case of th	NOTE! If the ASC cannot document that it considered and selected specific guidelines for use in its infection control program, a deficiency related to 42 CFR 416.51(b) must be cited. This is the case even if the ASC's infection control practices comply with generally accepted standards of practice/national guidelines. If the ASC neither selected any nationally recognized guidelines nor complies with generally accepted infection control standards of practice, then the ASC should be cited for a condition-level deficiency related to 42 CFR 416.51.									
16b. If YES to (a), which nationally-recognized infection control guidelines has the ASC selected for its program? (Select all that apply)	0 0	O O O Perioper	Hand hygiene (G Disinfection and Environmental I rative Standards es issued by a s	olation Precautions CDC/HICPAC) d Sterilization in He	ealthcare Facili n Healthcare Fa ed Practices (A ociety / organiz	ties (CDC/HICPAC) acilities (CDC/HICPAC) ORN)				
	0	Others	enecify (please	limit to the space .	provided):					
		FIEdSE	specify (piedse	limit to the space	pi ovided).					

	n care professional qualified through training lirect the ASC's infection control program?	0	YES NO						
certification) in infection control to dire 416.51(b)(1) must be cited. Lack of a de	t it has designated a qualified professional wit ect its infection control program, a deficiency of esignated professional responsible for infection evel deficiency related to 42 CFR 416.51.	relate	ning (not necessarily d to 42 CFR						
17a. If YES, Is this person an: (Select only ONE bubble) O ASC employee O ASC contractor									
•	nfection control (i.e., CIC) (Note: §416.50(b)(1 idual be certified in infection control.)	<mark>.)</mark> O	YES NO						
17c. If this person is NOT certif infection control, what type of control training has this persor	infection received?								
17d. On average, how many ho does this person spend in the A the infection control program?	ASC directing hours per wo		CC diverting the						
infection control program, but it is exp	he amount of time the person must spend in t ected that the designated individual spends su ideration the size of the ASC and the volume o	ufficie	<mark>nt time on-site</mark>						
18. Does the ASC have a system to activelated to procedures performed at the	vely identify infections that may have been e ASC?	0	YES						
NOTE! If the ASC does not have a docurrelated to 42 CFR 416.51(b)(3) must be	mented identification system, a deficiency cited.	0	NO						
18a. If YES, how does the ASC	O The ASC sends e-mails to patients after of	discha	irge						
obtain this information? (Select all that apply)	O The ASC follows-up with their patients' p discharge	orima	ry care providers after						
	O The ASC relies on the physician performing this information at a follow-up visit after the ASC	_							
	Other (please specify):								
18b. Is there supporting document	ation confirming this tracking activity?	0	YES NO						
NOTE! If the ASC does not have suppor cited.	ting documentation, a deficiency related to 42	CFR 4	416.51(b)(3) must be						
18c. Does the ASC have a policy/pr notifiable disease reporting require	ocedure in place to comply with State ements?	0	YES NO						
NOTE! If the ASC does not have a report	ting system, a deficiency must be cited related	d to <mark>4</mark>	2 CFR 416.51(b)(3).						

CMS does not specify the means for reporting; generally this would be done by the State health agency.

19. Do staff members receive infection	control training	.2			0	YES	
If training is completely absent, then cocitation in relation to 42 CFR 416.51, pocomply with infection control standard.	onsideration sho articularly when	uld be g			0	NO	
19a. If YES, how do they receive infection control training? (Select all that apply)	O In-service O Computer O Other (ple		rainin	g			
19b. Which staff members receive infection control training? (Select all that apply)		aff f provid onsible f	_	ect patient care site sterilization/	'high	-level disir	nfection
19c. Is training:	O the same O different f		_	ies of staff itegories of staff			
19d. Indicate frequency of staff infection control training (Select all that apply)	O Upon hire O Annually O Periodical O Other (ple	ly / as ne	eded				
19e. Is there documentation confirming that training is provided to all OYES categories of staff listed above? ONO NOTE! If training is not provided to appropriate staff upon hire/granting of privileges, with some refresher training thereafter, a deficiency must by cited in relation to 42 CFR 416.51(b) and (b)(3).							
20. How many procedures were observed during the site visit?	O 1	2		O 3		O 4	O Other
If other, please <i>specify</i> the number : procedures							

PART 2 - INFECTION CONTROL & RELATED PRACTICES

INSTRUCTIONS:

- Please select ONE bubble for each "Was Practice Performed?" and "Manner of Confirmation" question, unless otherwise noted.
- If N/A is **selected**, please explain why there is no associated observation, or why the question is not applicable, in the COMMENTS box at the end of each section.

I. Hand Hygiene

Observations are to focus on staff directly involved in patient care (e.g., physicians, nurses, CRNAs, etc.). Hand hygiene should be observed not only during the case being followed, but also while making other observations in the ASC throughout the survey. Interviews are used primarily to provide additional evidence for what the surveyor has observed, but may in some cases substitute for direct observation to support a citation of deficient practice.

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

Practices to be Assessed		Was Practice		nner of
	Per	formed?	Con	firmation
A. All patient care areas have:				
Note: 42 CFR 416.51(a) should be cited only if the answer to both a and b is	"No.	<mark>"</mark>		
a. Soap and water available	0	Yes No	0 0 0	Observation Interview Both
b. Alcohol-based hand rubs available	0	Yes No	000	Observation Interview Both
I. If alcohol-based hand rub is available in patient care areas, it is installed as required. (There are LSC requirements at 42 CFR 416.44(b)(5) for installation of alcohol-based hand rubs)	0 0	Yes No		
B. Staff perform hand hygiene:				
a. After removing gloves	0 0	Yes No N/A	0 0 0	Observation Interview Both
b. Before direct patient contact	0 0 0	Yes No N/A	0 0	Observation Interview Both
c. After direct patient contact	0 0 0	Yes No N/A	0 0 0	Observation Interview Both

Practices to be Assessed		Practice formed?		nner of firmation
d. Before performing invasive procedures (e.g. placing an IV)	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
e. After contact with blood, body fluids, or contaminated surfaces (even if gloves are worn)	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
C. Regarding gloves, staff:				
a. Wear gloves for procedures that might involve contact with blood or body fluids	0 0	Yes No N/A	0 0 0	Observation Interview Both
b. Wear gloves when handling potentially contaminated patient equipment	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
c. Remove gloves before moving to the next tasks and/or patient	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
D. Additional breaches in hand hygiene, not captured by the questions above, were identified (If YES, please specify further in comments)	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
Comments: (please specify)				
II. Injection Practices (injectable medications, saline, other infusates) Observations are to be made of staff <i>preparing</i> and <i>administering</i> medicat (e.g., anesthesiologists, certified registered nurse anesthetists, nurses). Unless otherwise indicated, a "No" response to any question below must be				
relation to 42 CFR 416.51(a).	orce o	as a dejie.	C116 P	nacioe in
Practices to be Assessed		Practice formed?		nner of firmation
A. Needles are used for only one patient	0	Yes No	0	Observation Interview
	0	N/A	0	Both

Practices to be Assessed		Practice ormed?	Manner of Confirmation		
B. Syringes are used for only one patient	0 0 0	Yes No N/A	0 0 0	Observation Interview Both	
C. The rubber septum on a medication vial is disinfected with alcohol prior to piercing.	000	Yes No N/A	000	Observation Interview Both	
D. Medication vials are always entered with a new needle	0 0	Yes No N/A	0 0 0	Observation Interview Both	
E. Medication vials are always entered with a new syringe	0 0 0	Yes No N/A	0 0 0	Observation Interview Both	
F. Medications that are pre-drawn are labeled with the <i>date and</i> time of draw, initials of the person drawing, medication name, strength and <i>discard</i> date <i>and</i> time	0 0 0	Yes No N/A	0 0	Observation Interview Both	
Note: A "No" answer should result in citation as a deficient practice in relation Administration of Drugs	<mark>n to</mark>	42 CFR 41	<mark>(6.48</mark>	<mark>(a),</mark>	
 a. Single dose (single-use) medication vials are used for only one patient 	0 0 0	Yes No N/A	0 0 0	Observation Interview Both	
b. Manufactured prefilled syringes are used for only one patient	0 0 0	Yes No N/A	0 0 0	Observation Interview Both	
c. Bags of IV solutions are used for only one patient	0 0 0	Yes No N/A	0 0	Observation Interview Both	
d. Medication administration tubing and connectors are used for only one patient	0 0 0	Yes No N/A	0 0 0	Observation Interview Both	

Practices to be Assessed			Practice ormed?	Manner of Confirmation		
H. Multi-dose injectable	medications are used for only one patient	0 0 0	Yes No N/A	0 0 0	Observation Interview Both	
-	ere is not necessarily a breach in infection control and see to either or both of the related questions I and J see				a citation.	
(Fill in N/A if no multi-do	ose medications/infusates are used).					
If YES, please skip to "K"	"					
If NO, please answer "I	and J":					
within 28 days unless the longer) date for that ope	ated when they are first opened and discarded e manufacturer specifies a different (shorter or ened vial. Note: This is different from the expiration ulti-dose vial can be dated with either the date	0	Yes No	0	Observation Interview	
opened or the discard do	ate as per ASC policies and procedures, so long as it presents and the same policy is used consistently	0	N/A	0	Both	
	ns used for more than one patient are stored and immediate areas where direct patient contact	0 0	Yes No N/A	0 0	Observation Interview Both	
K All sharps are dispose	d of in a puncture-resistant sharps container	0	Yes No	0	Observation Interview	
A. All sharps are dispose	a of the particular resistant sharps contained	0	N/A	0	Both	
		0	Yes	0	Observation	
L. Sharps containers are	replaced when the fill line is reached	0	No N/A	0	Interview Both	
A4 Additional broads as		0	Yes	0	Observation	
	in injection practices, not captured by the questions f YES, please specify further in comments)	0	No N/A	0	Interview Both	
Comments: (please <i>specify</i>)						

III. Single Use Devices, Sterilization, and High Level Disinfection

Pre-cleaning must always be performed prior to sterilization and high-level disinfection

Sterilization must be performed for critical equipment (i.e., instruments and equipment that enter normally sterile tissue or the vascular system, such as surgical instruments)

High-level disinfection must be performed for semi-critical equipment (i.e., items that come into contact with non-intact skin or mucous membranes such as reusable flexible endoscopes, laryngoscope blades)

Observations are to be made of staff *performing* equipment reprocessing (e.g., surgical techs), unless these activities are performed under contract or arrangement off-site from the ASC.

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

SINGLE-USE DEVICES

(Choose N/A if single-use devices are never reprocessed and used again) (Surveyor to confirm there is a contract or other documentation of an arrangement with a reprocessing facility by viewing it)

Praction	ces to be Assessed					s Practice formed?	_	nner of ifirmation
Α.	a. If single-use devices are	repro	ocessed, they are devices	that are	0	Yes	0	Observation
	approved by the FDA for r		•		0	No	0	Interview
					0	N/A	0	Both
	h If single use devices are		thou are represe	seed by an	0	Yes	0	Observation
	b. If single-use devices are	•	cessed, they are reproce	ssea by an	0	No	0	Interview
FDA-approved reprocessor.						N/A	0	Both
			STERILIZATION					
					0	Yes	0	Observation
A. Crit	ical equipment is sterilized				0	No	0	Interview
					0	N/A	0	Both
B. Are	e sterilization procedures per	rform	ed on-site?		0	Yes	0	Observation
	, skip to "F")				0	No	0	Interview
	•				0	N/A	0	Both
-	o" answer does not result in de for sterilization off-site, ur							
	eyor to confirm there is a cor gement for off-site sterilization			of an				
		0	Steam autoclave					
	a. If YES to B , please indicate method of	0	Peracetic acid					
	sterilization:	0	Other (please <i>specify</i>) :					

Practi	ces to be Assessed	_	s Practice formed?		nner of Ifirmation
	ns are pre-cleaned according to manufacturer's instructions or nce-based guidelines prior to sterilization	0 0 0	Yes No N/A	000	Observation Interview Both
D.		0	Yes	0	Observation
	a. Medical devices and instruments are visually inspected for residua	ان	No	0	Interview
	soil and re-cleaned as needed before packaging and sterilization	0	N/A	0	Both
		0	Yes	0	Observation
	b. A chemical indicator is placed in each load	0	No	0	Interview
		0	N/A	0	Both
		0	Yes	0	Observation
	c. A biologic indicator is performed at least weekly and with all	0	No	0	Interview
	implantable loads	0	N/A	0	Both
		0	Yes	0	Observation
	d. Each load is monitored with mechanical indicators (e.g. time,	0	No	0	Interview
	temperature, pressure)	0	N/A	0	Both
		0	Yes	0	Observation
	e. Documentation for each piece of sterilization equipment is	0	No	0	Interview
	maintained and up to date and includes results from each load	0	N/A	0	Both
		0	Yes	0	Observation
E. Iten	ns are appropriately contained and handled during the sterilization	0	No	0	Interview
	ss to assure that sterility is not compromised prior to use	0	N/A	0	Both
		0	Yes	0	Observation
F. Afte	er sterilization, medical devices and instruments are stored in a	0	No	0	Interview
design	nated clean area so that sterility is not compromised	0	N/A	0	Both
		0	Yes	0	Observation
G. Ste	rile packages are inspected for integrity and compromised packages	0	No	0	Interview
are re	processed	0	N/A	0	Both
		0	Yes	0	Observation
H. Add	ditional breaches in sterilization practices not captured by the question	sO	No	0	Interview
above	were identified (If YES, please specify further in comments)	0	N/A	0	Both
Comm (pleas	nents: se specify)				

	HI	GH-LEV	EL DISINFECTION				
Pract	ices to be Assessed				s Practice formed?		nner of nfirmation
A. Ser	mi-critical equipment is high-level disinfo	ected o	r sterilized	0 0	Yes No N/A	0 0 0	Observation Interview Both
B. Is high-level disinfection performed on site? (If NO, Skip to "F")					Yes No N/A	0 0 0	Observation Interview Both
	o" answer does not result in a citation, s under a contractual arrangement.)	ince AS	Cs are permitted to p	<mark>rovide</mark>	for high-le	evel (disinfection off-
(Surve	eyor to confirm there is a contract or othing it)	ner doc	umentation of an arra	ingem	ent for off-	site	sterilization by
	a. If answer to B was YES , please indicate method of high-level disinfection:	0 0 0	Manual Automated Other (please				
		spe	cify):				
	ms are pre-cleaned according to manufa nce-based guidelines prior to high-level			0 0	Yes No N/A	0 0	Observation Interview Both
D.	a. Medical devices and instruments a residual soil and re-cleaned as neede disinfection			0	Yes No N/A	0 0	Observation Interview Both
	b. High-level disinfection equipment i manufacturer instructions	s maint	tained according to	0 0	Yes No N/A	0 0	Observation Interview Both
	c. Chemicals used for high-level disinf	ection	are:				
	I. Prepared according to man	ufactur	er instructions	0 0	Yes No N/A	0 0 0	Observation Interview Both

Practices to be Assessed	Was Practice Performed?		Manner of Confirmation	
II. Tested for appropriate concentration according to manufacturer's instructions	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
III. Replaced according to manufacturer's instructions	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
IV. Documented to have been prepared and replaced according to manufacturer's instructions	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
d. Instruments requiring high-level disinfection are:				
I. Disinfected for the appropriate length of time as specified by manufacturer's instructions or evidence-based guidelines	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
II. Disinfected at the appropriate temperature as specified by manufacturer's instructions <i>or</i> evidence-based guidelines	000	Yes No N/A	0 0 0	Observation Interview Both
E. Items that undergo high-level disinfection are allowed to dry before use	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
F. Following high-level disinfection, items are stored in a designated clean area in a manner to prevent contamination	0 0 0	Yes No N/A	0 0	Observation Interview Both
G. Additional breaches in high-level disinfection practices, not captured by the questions above were identified (If YES, please specify further in comments)	0 0	Yes No N/A	0 0 0	Observation Interview Both
Comments: (please specify)				

IV. Environmental Infection Control

Observations are to be made of staff *performing* environmental cleaning (e.g., surgical technicians, cleaning staff, etc.)

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

Practices to be Assessed	Was Practice Performed?		Manner of Confirmation	
a. Operating rooms are cleaned and disinfected after each surgical or invasive procedure with an EPA-registered disinfectant		Yes No N/A	0 0 0	Observation Interview Both
B. Operating rooms are terminally cleaned daily	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
C. High-touch surfaces in patient care areas are cleaned and disinfected with an EPA-registered disinfectant	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
D. The ASC has a procedure in place to decontaminate gross spills of blood	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
E. Additional breaches in environmental cleaning not captured by the questions above were identified (If YES, please specify further in comments)	0 0 0	Yes No N/A	0 0	Observation Interview Both
Comments: (please specify)				

V. Point of Care Devices (e.g., blood glucose meter)

Observations are to be made of staff *performing* fingerstick testing (e.g., nurses)

If N/A is *selected*, please clarify in the comments box below why it was not applicable or not observed.

Unless otherwise indicated, a "No" response to any question below **must** be cited as a deficient practice in relation to 42 CFR 416.51(a).

Practices to be Assessed	Was Practice Performed?		Manner of Confirmation	
1. Does the ASC have a <i>point of care device, such as a</i> blood glucose meter? If NO, STOP HERE.	000	Yes No N/A	000	Observation Interview Both
A. A new single-use, auto-disabling lancing device is used for each patient	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
B. If used for more than one patient, the point of care device is cleaned and disinfected after every use according to manufacturer's instructions. Note: If the manufacturer does not provide instructions for cleaning and disinfection, then the device must not be used for more than one patient.	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
C. Additional breaches in appropriate use of point of care devices (like glucose meters) not captured by the questions above were identified (If YES, please specify further in comments)	0 0 0	Yes No N/A	0 0 0	Observation Interview Both
Comments: (please specify)				