

Pennsylvania Department of Health

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION (POC)	(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 8-0908	(X2) MULTIPLE CONSTRUCTION: A. BLDG: <u>00</u> B. WING: _____	(X3) DATE SURVEY COMPLETED: 03/14/2018
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NAME OF PROVIDER OR SUPPLIER: PLANNED PARENTHOOD KEYSTONE - WARMINSTER STATE LICENSE NUMBER: 00188701	STREET ADDRESS, CITY, STATE, ZIP CODE: 610 LOUIS DRIVE SUITE 303 WARMINSTER, PA 18974
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M 0000	INITIAL COMMENT	M 0000		
M 0032	<p>This report is the result of an Annual Registration survey conducted on March 14, 2018, at Planned Parenthood Keystone-Warminster. It was determined the facility was not in compliance with the requirements of the Pennsylvania Department of Health Regulations § 28 Pa Code, Chapter 29, Subchapter D, Ambulatory Gynecological Surgery in Hospitals and Clinics.</p>	M 0032		

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE	TITLE:	(X6) DATE:

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M 0032	Continued from page 1 29.43(b) Facility Approval All medical facilities except hospitals may become approved facilities upon submission of an application to the Department from a person authorized to represent such facility and, at the discretion of the Department, satisfactory completion of an on-site survey. This REGULATION is not met as evidenced by:	M 0032	Planned Parenthood Keystone offers to administer the Hepatitis B vaccine to all health center staff who have the potential to come in contact with blood or potentially infectious bodily fluids. Records of vaccination, either the consent or declination, are kept centrally in the employees confidential health records stored by the affiliate's Human Resource Department. Prior to inspection, Planned Parenthood Keystone has been in the process of converting from paper files to electronic files using a human resource software program. The program has hard stops built into it so new employees will not be able to commence working in a health center until the consent to vaccinate or the declination form has been received. This system is currently in place and fully functioning for all new employees. Employees who have worked for Planned Parenthood Keystone prior to its implementation, their files are being scanned into the system which should be completed	Completion Date: 04/27/2018 Status: APPROVED Date: 04/18/2018

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M 0032	Continued from page 2	M 0032	<p>within the next 60 days.</p> <p>Employee files are audited biannually, however after the inspection on 3/14/2018, an interim audit was conducted of all health center employees to ensure that documentation of this benefit was in their respective files. During the audit, one of the missing documents noted during this inspection was found and placed into EMP5's file. CF1's form was not found however, so the employee was sent a replacement which has since been received and placed into CF1's file.</p> <p>EMP8's form has since been updated and placed in the record.</p> <p>With respect to the new electronic system, for employees who decline the vaccination, this simply gets noted in their electronic file and is permanently stored. For those employees who consent to receive the vaccination, a tickler will be placed in the system to ensure the employee records are up to date</p>	

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M 0032	Continued from page 3	M 0032	<p>once the three-dose series is completed. Vaccinations take place over the course of six months. In either case, with this new system, which is tied in with timekeeping, will not allow an employee to continue to work in a health center unless the forms is completed.</p> <p>The Director of RQM or designee will audit the system quarterly to ensure that both declination and those who consent to vaccination have current up to date records in their employee files.</p>	

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M 0032	Continued from page 4 Based on review of facility documents, personnel files (PF), credential files (CF) and staff interview (EMP), it was determined the facility failed to ensure staff having potential exposure to blood and body fluids received the Hepatitis B Vaccine for two of eight PF files reviewed (PF5 and PF8) and one of one CF files reviewed (CF1). Findings include: Review on March 14, 2018, of the facility's "Planned Parenthood Keystone Employee Handbook" last approved January 2018, revealed "... 3.1 Immunization Planned Parenthood follows the recommendations form the Centers for Disease Control and Prevention (CDC) and the requirements of the Occupational Safety and Health Administration (OSHA) in regard to immunizations for health care workers. Planned Parenthood offers the Hepatitis B immunization at no cost to employees who have not been immunized and who are at risk due to their job duties or contact with patients. While employees have the option to waive	M 0032		

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M 0032	<p>Continued from page 5</p> <p>this immunization we strongly recommend it. ..."</p> <p>Review of PF5 on March 14, 2018, revealed this employee worked as a Medical Care Assistant (MCA) in the facility.</p> <p>Interview with EMP1 on March 1, 2018, at approximately 2:45 PM revealed EMP5's job required contact or potential contact with patients' blood and body fluids.</p> <p>There was no documentation in EMP5's personnel file indicating the facility offered this employee the Hepatitis B Vaccine (HBV) vaccine or that EMP5 declined receiving the HBV vaccine.</p> <p>Interview with EMP1 on March 14, 2018, at approximately 2:45 PM confirmed there was no documentation in EMP5's personnel file the facility offered this employee the HBV vaccine or that EMP5 declined the HBV vaccine.</p> <p>Review of EMP8 on March 14, 2018, revealed the</p>	M 0032		

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M 0032	Continued from page 6 facility hired this employee on July 19, 2017. EMP8 signed the consent form and requested the facility administer the HBV vaccine. Interview with EMP1 on March 1, 2018, at approximately 2:50 PM revealed EMP8's job required contact or potential contact with patients' blood and body fluids. There was no documentation in EMP8's personnel file indicating the facility administered the HBV vaccine to this employee. Interview with EMP1 on March 14, 2018, at approximately 2:50 PM confirmed EMP8 signed the consent form requesting the facility administer the HBV vaccine when hired, and there was no documentation in EMP8's personnel file indicating the facility administered the HBV vaccine to this employee. Review of CF1 on March 14, 2018, revealed this physician worked at the facility performing	M 0032		

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M 0032	<p>Continued from page 7</p> <p>abortions.</p> <p>Interview with EMP1 on March 1, 2018, at approximately 3:00 PM revealed CF1's job required contact or potential contact with patients' blood and body fluids.</p> <p>There was no documentation in CF1's credential file indicating the facility offered this physician the HBV vaccine or that CF1 declined receiving the HBV vaccine.</p> <p>Interview with EMP1 on March 14, 2018, at approximately 3:00 PM confirmed there was no documentation in CF1's credential file indicating the facility offered this physician the HBV vaccine or that CF1 declined the HBV vaccine.</p>	M 0032		



Certified End Page

PLANNED PARENTHOOD KEYSTONE - WARMINSTER

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SURVEY EXIT DATE: 03/14/2018

I Certify This Document to be a True and Correct Statement of Deficiencies and Approved Facility Plan of Correction for the Above-Identified Facility Survey

Handwritten signature of Nancy J. Lescavage in black ink on a light gray background.

Nancy J. Lescavage
Deputy Secretary for Quality Assurance

Handwritten signature of Rachel L. Levine, MD in black ink on a light gray background.

Rachel L. Levine, MD
Secretary of Health



THIS IS A CERTIFICATION PAGE

PLEASE DO NOT DETACH

THIS PAGE IS NOW PART OF THIS SURVEY