



(717) 783-1379

December 1, 2010

[REDACTED]  
Penn Family Care of the Clinical  
Practices of the University of Pennsylvania  
7th Floor, Mutch Building  
39th and Market Streets  
Philadelphia, Pennsylvania. 19104

Dear [REDACTED]

On November 16, 2010, an onsite survey was conducted at Penn Family Care of the Clinical Practices of the University of Pennsylvania. The survey findings revealed that the clinic failed to provide services in accordance with 28 PA. Code Chapter 29, Subchapter D, Ambulatory Gynecological Surgery in Hospitals and Clinics. Specifically, the clinic did not meet the following requirement:

29.33 (6) Requirements for Abortion. Prior to the performance of an abortion, the attending physician shall insure that that the patient has had tests for hemoglobin or hematocrit, blood group and RH type, and urine protein and sugar. All of the foregoing laboratory results shall be entered in the medical record of the patient.

Onsite review of medical records and interview with the Director of Clinical Care Services revealed the facility does not perform the tests of urine protein and sugar prior to the procedures.

Four (4) of four (4) medical records reviewed on November 16, 2010 from approximately 12:15 PM – 1:00 PM revealed there was no documentation showing the tests of urine protein and sugar had been performed prior to procedures. Interview with the Director of Clinical Care Services at the completion of the medical record reviews confirmed these tests were not performed.

The facility needs to develop and implement a corrective action plan.

, along with evidence for a mechanism for monitoring. You have 10 calendar days from the date of this letter to submit a corrective action plan. Thank you and your staff for the consideration shown at the time of the survey.

Sincerely,

Division of Home Health

Penn Family Care at 7 Mutch and Saint Leonard's Court  
Penn Medicine, Department of Family Medicine & Community Health

January 12, 2011

C, [Redacted]  
Pennsylvania Department of Health  
Division of Home Health  
132 Kline Plaza, Suite A  
Harrisburg, PA 17104

Dear I

Thank you for your letter regarding the November 16, 2010, onsite survey conducted at Penn Family Care of the Clinical Practices of the University of Pennsylvania.

I wanted your department to know that as soon as your letter was in my receipt, our multidisciplinary team convened to respond to the survey findings. I am attaching a plan of correction implemented by our team composed of administration, department administration, physicians, and nurses, to address the identified opportunity for improvement.

We want to thank you for the time your team spent with us at Penn Family Care.

If you have need for any additional information, and for future regulatory correspondence, please contact the Penn Presbyterian Medical Center Regulatory Office as follows:

[Redacted]

Penn Presbyterian Medical Center  
51 N. 39th Street  
Philadelphia, PA 19104  
(215) 662-9392 or (215) 605-3042

*approves*  
*contacts*  
*1/20/11*

[Redacted]

Sincerely,

[Redacted]

[Redacted]

RECEIVED

JAN 18 2011

PA DEPT OF HEALTH  
DIVISION OF HOME HEALTH

**Penn Family Medicine**

Exit Date	Initial Comment	Plan of Correction	Completion Date
11/16/2010	<p>29.33 (6) Requirements for Abortion. Prior to the performance of an abortion, the attending physician shall insure that the patient has had tests for hemoglobin or hematocrit, blood group and RH type, and urine protein and sugar. All of the foregoing laboratory results shall be entered in the medical record of the patient.</p> <p>Observation of surveyor- Four (4) of four (4) medical records reviewed on November 16, 2010 revealed there was no documentation showing the tests of urine protein and sugar had been performed prior to procedures. Interview with the Director of Clinical care Services at the completion of the medical record reviews confirmed these tests were not performed.</p>	<p>The Medical Director of Penn Family Care (PFC) reviewed the survey results and testing requirements for abortion procedures section, 29.33 (6) with the applicable providers and clinicians. The education specifically emphasized the need to perform a urine protein and sugar prior to an abortion procedure.</p> <p>An interdisciplinary team led by the PFC Medical Director, convened to review opportunities to improve to sustain compliance with section 29.33 (6) of the regulations.</p> <p>Action Items:</p> <p style="padding-left: 20px;">⇒ The policy for Pregnancy Termination (11.218) was modified to include urine testing for protein and sugar prior to a procedure;</p> <p style="padding-left: 20px;">⇒ The team modified the pre-procedural checklist for abortion procedures to include the urine protein and sugar test.</p> <p>The PFC Medical Director submitted a summary of the above plan of correction to educate and reinforce the plan with the applicable providers and applicable clinicians.</p>	<p>11/16/2010</p> <p style="text-align: center;">1/10/2011</p>

			<p><u>Quality Monitoring Process:</u></p> <p>100% of patient medical records will be monitored over the next 3 months to ensure compliance with the requirement to test for urine protein/sugar prior to abortion procedures. The PFC Quality Officer will oversee the monitoring and report to the Clinical Effectiveness and Quality Improvement Committee (CEQI) and take action, if indicated.</p>	1/10/11 - 3/10/11
--	--	--	--	----------------------