



(717) 783-1379

November 16, 2010

[REDACTED]  
Planned Parenthood of Southeastern Pennsylvania (PPSP)  
1144 Locust Street  
Philadelphia, Pennsylvania 19107

RE: Facility ID #00238701

Dear [REDACTED]

On October 19, 2010, an on-site survey was conducted at Planned Parenthood of Southeastern 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(13) Requirements for Abortion. Each patient shall be supervised constantly while recovering from surgery or anesthesia, until she is released from recovery by a registered nurse or a licensed practical nurse under the direction of a registered nurse or a physician. The nurse shall evaluate the condition of the patient and enter a report of the evaluation and orders in the medical record of the patient.

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Onsite survey review of medical records, facility's policies and procedures and interview with the Facility Director revealed the facility was not following its policy for "Post-Procedure Management Recovery Area" for six (6) of ten (10) patients, who received intravenous sedation.

On October 19, 2010 approximately 1:30 PM review of the agency's policy (revision August 2010) for Post-Procedure Management under "Recovery Area" revealed, "# 2. Immediate post-operative client care shall consist of observation and monitoring in a supervised recovery area as long as the client's condition warrants. This includes monitoring vital signs (level of consciousness, blood pressure, pulse, cramps, bleeding and oxygen saturation) every 15 minutes and shortly before discharge from the recovery area."

Medical records reviewed on October 19, 2010 between 11:45 AM and 2:30 PM revealed the following:

Medical record# 1069950: According to the patient's operative note record of October 16, 2010, the procedure was completed at "2:46 PM". The Recovery Room note revealed the registered nurse documented the vital signs at "1400 and 1445", forty-five minutes later. The patient was discharged at "1440 in stable condition". The recovery room note was signed by a physician on October 16, 2010.

Medical record# 217000: According to the patient's operative note record of September 30, 2010, the procedure was completed at "1:05 PM". The Recovery Room note revealed the registered nurse documented the vital signs at "1:10 PM" and "1:40 PM", thirty minutes later. The patient was discharged

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at "1:45 PM in stable condition". The recovery room note was signed by a physician on September 3, 2010.

Medical record# 1143619: According to the patient's operative note record of October 16, 2010, the procedure was completed at "4:35 PM". The Recovery Room note revealed the registered nurse documented the vital signs at "1635" and "1715", forty minutes later. The patient was discharged at "1715 in stable condition". The recovery room note was signed by a physician on October 16, 2010.

Medical record# 194066: According to the patient's operative note record of October 15, 2010, the procedure was completed at ""3:20 PM". The Recovery Room note revealed the registered nurse documented the vital signs at "3:20 PM" and "3:50 PM", thirty minutes later. The patient was discharged at "3:58 PM in stable condition". The recovery room note was signed by a physician on October 15, 2010.

Medical record# 298021: According to the patient's operative note record of October 16, 2010, the procedure was completed at "1:20 PM". The Recovery Room note revealed the registered nurse documented the vital signs at "1320" and "1400", forty minutes later. The patient was discharged at "1415 in stable condition". The recovery room note was signed by a physician on October 16, 2010.

Medical record# 1117523: According to the patient's operative note record of October 17, 2010, the procedure was completed at "1:25 PM". The Recovery Room note revealed the registered nurse documented the vital signs at "1: 35 PM" and "1415", forty minutes later. The patient was discharged at "1425 in stable condition". The recovery room note was signed by a physician on October 17, 2010.

Interview conducted on October 19, 2010 at approximately 2:45 PM with the Facility Director confirmed the above identified findings.

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The facility needs to develop and implement a corrective action plan. Please submit your written corrective action plan to the Department of Health, Division of Home Health 132 Kline Plaza, Suite A, Harrisburg, PA 17104, 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. If you have questions, please feel free to contact

Sincerely,

cc: File



Planned Parenthood®  
Southeastern Pennsylvania

Thursday, December 16, 2010

Department of Health  
Division of Home Health  
Harrisburg Pa. 17104

RE: Facility ID #00238701 Plan of Correction

I apologize for the delay in providing this Plan of Correction. I had a death in my family which hindered my ability to get this to you in a timely manner.

Enclosed you will find the Plan of Correction for our Locust St., Philadelphia site, facility ID #00238701. Included is the audit tool with which we will use to assess adherence to our policy for the monitoring of patients in our recovery room.

I have also enclosed a quality assurance plan for our West Chester site as an addendum to their previously submitted Plan of Correction related to Rh testing.

Please let me know if there is anything further you need.

Sincerely,



Plan of Correction – December 16, 2010

Facility ID #00238701

1. All nursing staff will receive re-training on Policy VII-A-1 Surgical Abortion, Section XII Post Procedure Management: Recovery Room. Specifically, the need for monitoring patients' vital signs every fifteen minutes until discharge from the Recovery Room will be stressed. Documentation of this training will be kept in the surgical office files and the employees' Human Resources file. All re-trainings will be completed by January 5, 2011.
  2. All agency nurses will be required to read all Surgical policies prior to working at PPSP. They will have an opportunity to have questions answered either by a PPSP surgical nurse or the Clinical Services Coordinator prior to working. Documentation of this will be kept in the surgical office as well as Human Resources. (A copy of the form to be signed is enclosed.)
  3. Charts will be audited February 7, 2011 to assess level of compliance with a benchmark set at 95% following training. Audit results will be summarized and presented to Mary Banecker, VP of Patient Services, who will determine whether further intervention(s) is necessary.
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## Plan of Correction

### Re-training of SULO Recovery Room Nurses

I have received training on Policy VII-A-1 Surgical Abortion, Section XII Post Procedure Management: Recovery Room and understand that Vital Signs are to be done upon admission to the recover room, and every 15 minutes thereafter, with a final set immediately priot to discharge from the recovery room. I understand that each set of Vital Signs include blood pressure, pulse, and O2 Sat (IV sedation patients only).

I have been given an opportunity to answer any questions I have had.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date



Planned Parenthood®  
Southeastern Pennsylvania

## Training for Agency Nurses

I have read the following Planned Parenthood SEPA policies and have had my questions answered to my satisfaction.

- VII-A-1 Surgical Abortion
- VII-A-2 Surgical Abortion High Alert – Post-op Protocol
- VII-B-1 Mifepristone Medical Abortion
- VII-B-3 Mifeprex Misoprostol Abortion Adverse Event Report
- XIII-A-1 Medical & Surgical Emergencies
- XIII-C-1 Psychosocial Emergencies

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

