



10/12/2017

ATTN: Janice Thomas  
Reproductive Health Services Springfield  
626 E. Battlefield Springfield, Mo 65807

Regarding: Initial ASC licensure survey of **Reproductive Health Services of Springfield**

Dear Janice Thomas:

Representatives of the Missouri Department of Health & Senior Services, Bureau of Ambulatory Care, conducted an onsite initial licensure survey of the facility on 10/10-11/2017. Listed below are items our survey indicated were not in compliance. The initial survey could not be completed as the facility was not fully ready to provide all patient care services in full compliance with all state regulations.

Until a written response is provided describing how all items below have been addressed, including evidence of compliance, **an ASC license cannot be issued.**

The facility was found to not be in compliance with the following:

**19 CSR 30-30.060(1)(B)8** *The facility shall establish a program for identifying and preventing infections and for maintaining a safe environment. Infectious and pathological wastes shall be segregated from other wastes at the point of generation and shall be placed in distinctive, clearly marked, leak-proof containers or plastic bags appropriate for the characteristics of the infectious wastes. Containers for infectious waste shall be identified with the universal biological hazard symbol. All packaging shall maintain its integrity during storage and transport.*

- Medication prep/storage area in lab area and at risk for cross-contamination;
- Pressed-board clipboard at registration desk with un-cleanable surface;
- Expired urine test strips;
- No recent infection control training for two of six employee files reviewed;
- Examination table in the ultrasound exam room had rust along the front edge of the table. There was damage to the wood at the base of the table and missing laminate on the front of the table, exposing pressed wood. All of which created un-cleanable surfaces; and
- Examination room #4 had a high level chemical disinfectant in an instrument soaking container located next to the hand washing sink. Used vaginal ultrasound probes were cleaned in the hand washing sink and decontaminated with a high level disinfectant in the examination room. The facility failed to place the probe in a leak-proof container or plastic bag and transport it to the soiled utility room to be cleaned and decontaminated.
- There were no smoke detectors in the training room, laboratory, store room and three offices.

**19 CSR 30-30.060(1)(B)13** *A personnel record shall be maintained on each employee and shall include documentation of each employee's orientation, health status, education and training, as well as verification of current licenses for physicians, registered nurses (RNs) and licensed practical nurses (LPNs).*

- No criminal background check on three of six employee files reviewed.

**19 CSR 30-30.050 Definitions and Procedures for Licensing Abortion Facilities**  
**(1)(C) 3.** *The governing body, acting upon recommendations of the medical staff, shall approve or disapprove appointments. Written criteria shall be developed for privileges extended to each member of the staff. A formal mechanism shall be established for recommending to the governing body delineation of privileges, curtailment, suspension or revocation*

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*of privileges and appointments and reappointments to the medical staff.*

*-For three of three physicians (Staff AA, BB, CC) there was no recommendation by the medical staff or approval by the governing body for the physicians to be on the medical staff at this facility. The credentialing packets were incomplete and did not include:*

*-Information for Physician staff AA and BB did not include privileges requested and approved.*

*-Physician staff BB did not have a BNDD/DEA*

*-Physician staff CC had a date of 05/02/17 on a credentialing sheet but it was unclear if the privileges and approval were for this facility.*

*-The meeting minutes provided, dated 01/06/2016, did not include names of physicians or identification of this facility for the section where it mentioned approval of attending physicians.*

**19 CSR 30-30.060(3)(L) Emergency drugs, oxygen and intravenous fluids shall be available in the procedure room to stabilize the patient's condition when necessary. A manual breathing bag, suction machine and endotracheal equipment shall be located in the clinical area for immediate access.**

*- No suction machine; and*

*- No endotracheal equipment.*

**19 CSR 30-30.060(3)(C) A medical history shall be obtained and a health assessment including a pelvic examination shall be performed. There must be confirmation of pregnancy by clinical evidence and laboratory tests. The findings shall be used in determining the duration of gestation, identifying preexisting medical or other complications, and detecting any factors which could influence the choice of the procedure, anesthesia or preoperative and postoperative management. If the physician determines gestation is beyond the first trimester, an ultrasound examination shall be performed and results shall be recorded in the patient's chart.**

*- The facility failed to have policies and procedures in place that addressed pelvic examinations for medication abortions.*

**19 CSR 30-30.060(4)(D) The following laboratory procedures shall be performed on every abortion patient: hematocrit; urinalysis, including pregnancy test; and Rh typing.**

*- The facility failed to stock the glucometer control testing solutions used to verify the glucometer is functioning properly before use.*

Please respond in writing providing evidence/documentation that each of these items has been fully addressed/corrected. Only upon successful completion of the revisit process an ASC license can be issued.

If you have further questions, you can contact the onsite team leader, [Todd Cummins] via email ([todd.cummins@health.mo.gov]) or call our office at 573-751-6083.

Sincerely,



John Langston, Administrator

[John.Langston@health.mo.gov](mailto:John.Langston@health.mo.gov)

Bureau of Ambulatory Care

Missouri Department of Health & Senior Services