



# WAIVER REQUEST FORM

DPH – CQAC – DHCQ, 99 Chauncy Street, 2nd Floor, Boston, MA 02111

All waiver requests regarding a PHYSICAL PLANT REQUIREMENT MUST BE ACCOMPANIED BY REDUCED PLANS on 8½" x 11" sheets for clarification of specific physical plant condition to be waived. Physical plant waiver requests received without accompanying plans will be returned as "DENIED".

**NOTE: A SEPARATE WAIVER REQUEST FORM MUST BE SUBMITTED FOR EACH REQUIREMENT FOR WHICH A WAIVER IS REQUESTED.**

## PLANNED PARENTHOOD LEAGUE OF MASSACHUSETTS

Facility's Licensed Name or Proposed Name Address, including zip code

WORCESTER HEALTH CENTER, 470 PLEASANT STREET, WORCESTER, MA 01609

If Hospital/Clinic Satellite, Name Address, including zip code

N/A

Hospital/Clinic Department Building/Floor Location

I HEREBY REQUEST THE DEPARTMENT WAIVE COMPLIANCE WITH THE REGULATION OR REQUIREMENT:

1.A: FOUND AT: AIA Guidelines 2006, Section 3.7 - 1.5.2  
(Regulation/Requirement Citation)

1.B: THAT REQUIRES (Text of Regulation/Requirement):

Layout - Section 3.7 – 1.5.2  
The outpatient surgical facility shall be divided into three designated areas – unrestricted, semi-restricted, and restricted – that are defined by the physical activities performed in each area.

2.A: DESCRIPTION OF PROPOSED ALTERNATIVE TO COMPLIANCE WITH THE REQUIREMENT:

2.B: HOSPITALS AND LONG TERM CARE FACILITIES – WHAT WILL BE DONE TO COMPENSATE; CLINIC AND HOSPICE – HOW THE PROVIDER WILL REMAIN IN SUBSTANTIAL COMPLIANCE:

The design provides for 7 One-Rooms, classified as Class A operating rooms, and 1 Over-flow recovery room located in an unrestricted corridor. Although defined unrestricted by 3.7 – 1.5.2, the corridor is entered from the elevator or the stairs by swipe card entry only. Access by patients will always be under supervision of clinical staff.

PLANNED PARENHOOD LEAGUE OF MASSACHUSETTS, WORCESTER HEALTH CENTER

Facility's Licensed Name or Proposed Name

Address, including zip code

Regulation/Requirement Citation:

AIA Guidelines 2006, Section 3.7 - 1.5.2

3. PROVIDER'S EXPLANATION OF HOW MEETING THE REQUIREMENT AS WRITTEN WOULD CAUSE UNDUE HARDSHIP:

Functionally, PPLM is an outpatient exam and treatment facility, but is being reviewed to comply with outpatient surgery facilities requirements. Due to the nature of the procedures undertaken at the facility, a restricted area consisting of a clean core and scrub facilities is not required. The One-Rooms, classified as Class A operating rooms by the American College of Surgeons, can be located in an unrestricted corridor.

4. PROVIDER'S ASSURANCE THAT APPROVAL OF THE WAIVER: (A) WILL NOT LIMIT THE CAPACITY TO PROVIDE ADEQUATE CARE; AND, (B) DOES NOT JEOPARDIZE/AFFECT PATIENT OR RESIDENT HEALTH AND SAFETY:

Because the procedures performed at this facility are minor, non-invasive procedures, health and safety of patients is adequately provided via the one rooms and over flow recovery room being accessed by the unrestricted (but restricted by swipe card access) corridor. Further, because the procedures performed at this facility are non-invasive, a clean core and scrub facility is not required for infection control purposes; not providing such facilities does not affect patient health and safety.

FACILITY AUTHORIZED REPRESENTATIVE:

Name: Dianne Luby
Title: President/CEO
Mailing: 1055 Commonwealth Ave
Boston, MA 02215

Signature:

[Handwritten signature of Dianne Luby]

FACILITY CLINICAL REPRESENTATIVE:

Name: Karen Caponi
Title: Health Services Director
Tel #: 508-854-330, ext 1103

Signature:

[Handwritten signature of Karen Caponi]

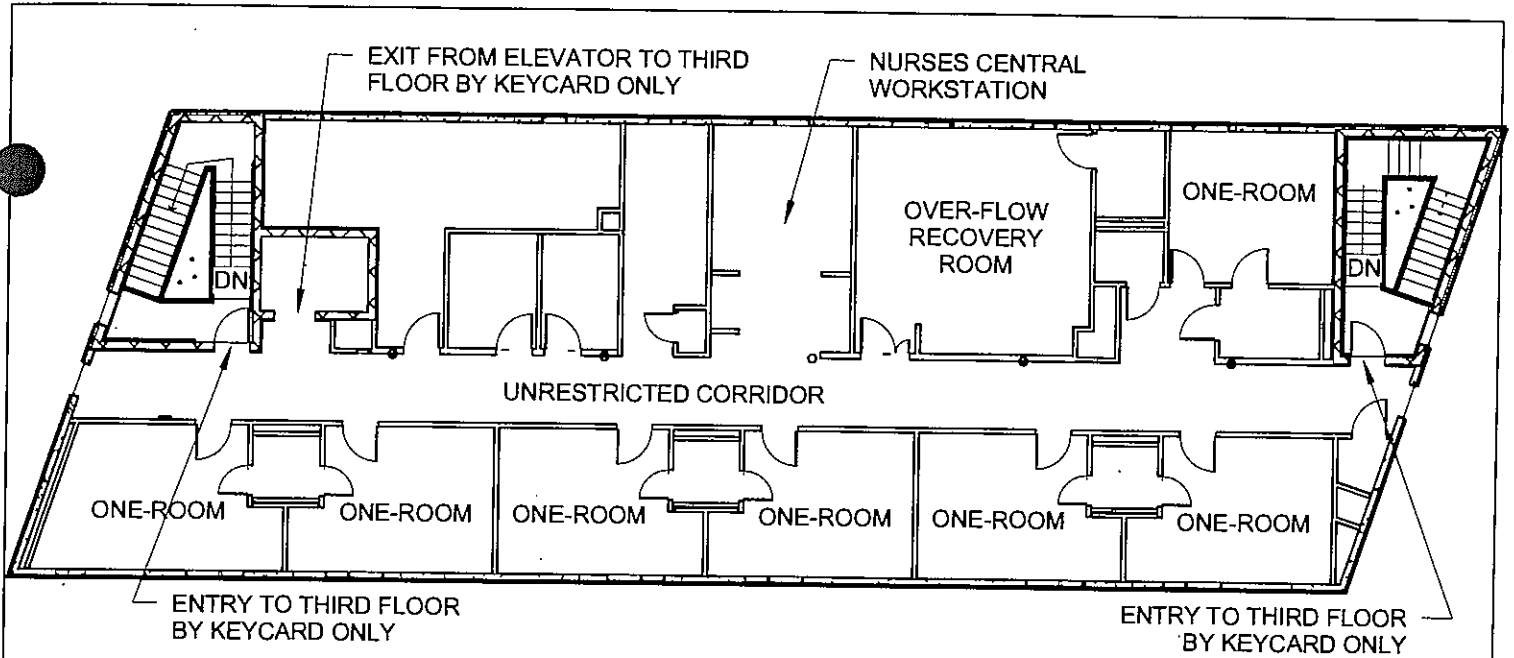
For DPH Use Only: The waiver identified above is approved, approved with conditions or denied as indicated below.

Evaluated by: [Signature] 01/06/09 [X] Approved [ ] Approved w/Conditions [ ] Denied

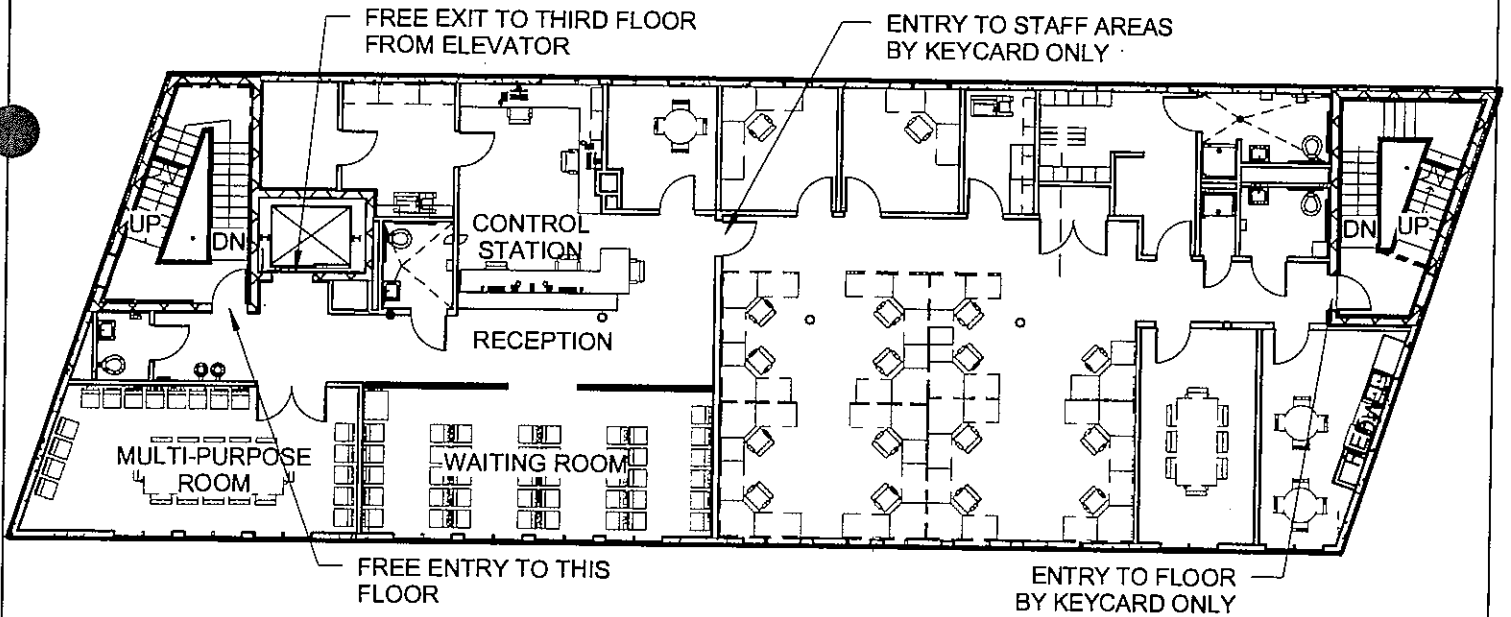
Reviewed by: [Signature] 1/6/09 [X] Approved [ ] Approved w/Conditions [ ] Denied

CONDITIONS:

Note: This waiver may be evaluated during on-site visits by Department staff at the facility. The Department reserves the right to revoke the waiver approvals if deficiencies are cited that indicate that the waivers adversely affect patient or resident health and safety.



**2** LAYOUT WAIVER - THIRD FLOOR  
1/16" = 1'-0"



**1** LAYOUT WAIVER - SECOND FLOOR  
1/16" = 1'-0"

**ARCHITERRA**

PLANNED PARENTHOOD  
WORCESTER HEALTH CENTER

LAYOUT WAIVER - Section 3.7 - 1.5.2

Project number 2007-02

**SK W-11**

Date OCTOBER 31, 2008

Scale 1/16" = 1'-0"

11/2/2008 5:56:43 PM





### WAIVER REQUEST FORM

DPH – CQAC – DHCQ, 99 Chauncy Street, 2nd Floor, Boston, MA 02111

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#### PLANNED PARENTHOOD LEAGUE OF MASSACHUSETTS

Facility's Licensed Name or Proposed Name \_\_\_\_\_ Address, including zip code \_\_\_\_\_

WORCESTER HEALTH CENTER, 470 PLEASANT STREET, WORCESTER, MA 01609

If Hospital/Clinic Satellite, Name \_\_\_\_\_ Address, including zip code \_\_\_\_\_

N/A

Hospital/Clinic Department \_\_\_\_\_ Building/Floor Location \_\_\_\_\_

I HEREBY REQUEST THE DEPARTMENT WAIVE COMPLIANCE WITH THE REGULATION OR REQUIREMENT:

1.A: FOUND AT: \_\_\_\_\_ AIA Guidelines 2006, Section 3.7 - 3.1.2.3  
(Regulation/Requirement Citation)

1.B: THAT REQUIRES (Text of Regulation/Requirement):

Storage for clean/sterile supplies  
(1) Storage for pack(s), etc., shall include provisions for ventilation, humidity, and temperature control  
(2) The clean and sterile supply room shall have a minimum floor area of 100 square feet (30.48 square meters) or 50 square feet (15.24 square meters) per operating room, which ever is greater.

2.A: DESCRIPTION OF PROPOSED ALTERNATIVE TO COMPLIANCE WITH THE REQUIREMENT:

2.B: HOSPITALS AND LONG TERM CARE FACILITIES – WHAT WILL BE DONE TO COMPENSATE; CLINIC AND HOSPICE – HOW THE PROVIDER WILL REMAIN IN SUBSTANTIAL COMPLIANCE:

As described in the project narrative, the 7 One-Rooms have been designed to accommodate the combined functions of examination, treatment, and phase II recovery. Supplies needed for the particular procedures performed in the clinic will be delivered daily and stored in dedicated casework with in the Clean Workroom (#319).

PLANNED PARENHOOD LEAGUE OF MASSACHUSETTS, WORCESTER HEALTH CENTER

Facility's Licensed Name or Proposed Name

Address, including zip code

Regulation/Requirement Citation:

AIA Guidelines 2006, Section 3.7 - 3.1.2.3

3. PROVIDER'S EXPLANATION OF HOW MEETING THE REQUIREMENT AS WRITTEN WOULD CAUSE UNDUE HARDSHIP:

Functionally, PPLM is an outpatient exam and treatment facility, but is being reviewed to comply with outpatient surgery facilities requirements. The clean/sterile supplies storage can be accommodated with in the Clean Workroom (#319).

4. PROVIDER'S ASSURANCE THAT APPROVAL OF THE WAIVER: (A) WILL NOT LIMIT THE CAPACITY TO PROVIDE ADEQUATE CARE; AND, (B) DOES NOT JEOPARDIZE/AFFECT PATIENT OR RESIDENT HEALTH AND SAFETY:

A 350sqft clean/sterile supply room is not necessary for our facility because our procedures are non-invasive. The clean/sterile supplies can be stored with in the casework of the Clean Workroom (#319) without jeopardizing patient safety.

FACILITY AUTHORIZED REPRESENTATIVE:

Name: Dianne Luby
Title: President/CEO
Mailing: 1055 Commonwealth Ave
Boston, MA 02215

Signature: [Handwritten Signature]

FACILITY CLINICAL REPRESENTATIVE:

Name: Karen Caponi
Title: Health Services Director
Tel #: 508-854-330, ext 1103

Signature: [Handwritten Signature]

For DPH Use Only: The waiver identified above is approved, approved with conditions or denied as indicated below.

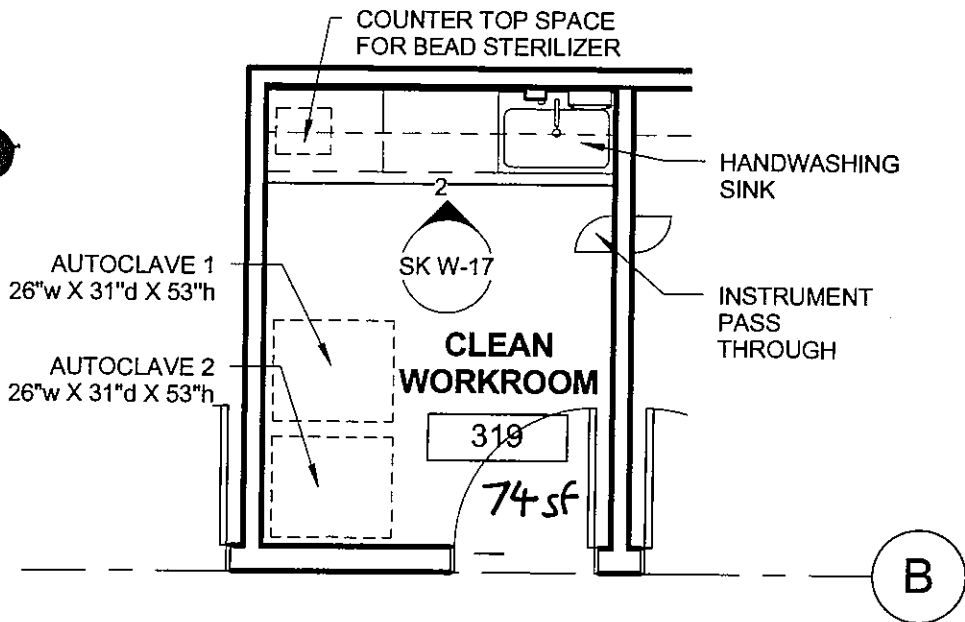
Evaluated by: [Signature] 01/06/09 [ ] Approved [X] Approved w/Conditions [ ] Denied

Reviewed by: [ ] Approved [ ] Approved w/Conditions [ ] Denied

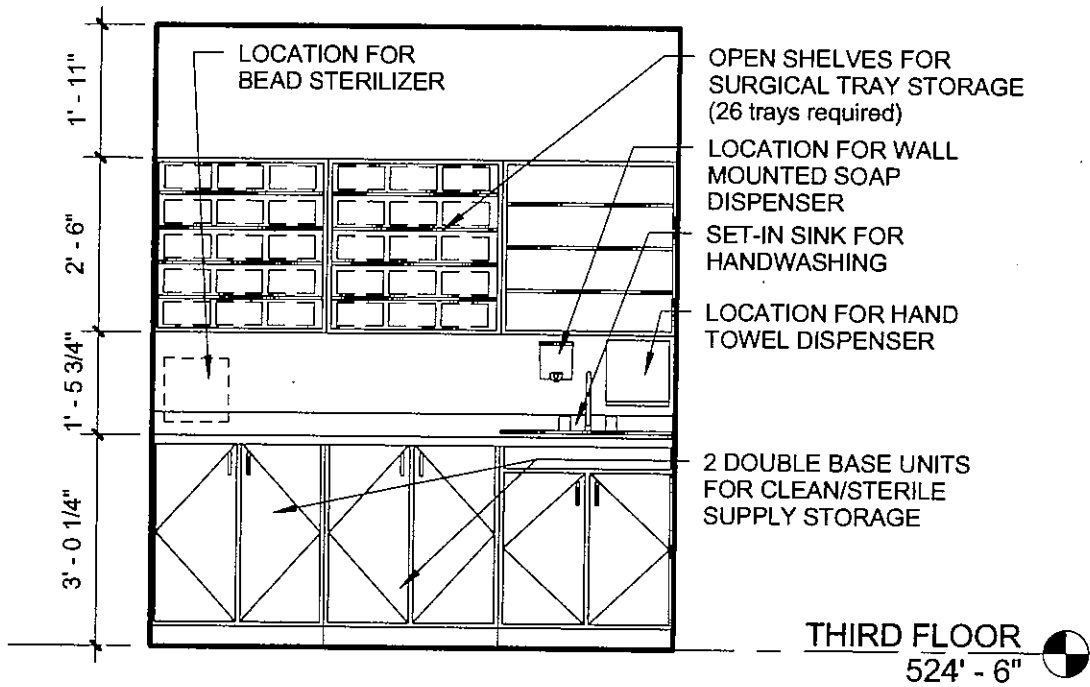
CONDITIONS:

This waiver approval is to allow the floor area of the clean workroom to be 74 square feet in lieu of 350 square feet normally required for a surgical suite with 7 operating rooms. This waiver is based on the limited and non invasive nature of the gynecological procedures to be performed, as detailed in the attached Project Narrative.

Note: This waiver may be evaluated during on-site visits by Department staff at the facility. The Department reserves the right to revoke the waiver approvals if deficiencies are cited that indicate that the waivers adversely affect patient or resident health and safety.



1 CLEAN/STERILE SUPPLIES - CLEAN WORKROOM  
1/4" = 1'-0"



2 CLEAN/STERILE SUPPLIES STORAGE  
3/8" = 1'-0"

ARCHITERRA

PLANNED PARENTHOOD  
WORCESTER HEALTH CENTER

CLEAN/STERILE SUPPLIES  
Section 3.7 - 3.1.2.3

Project number 2007-02

SK W-17

Date OCTOBER 31, 2008

Scale As indicated

11/6/2008 11:44:22 AM





Facility Name: **PLANNED PARENTHOOD LEAGUE OF MASSACHUSETTS**  
Facility Address: **1055 COMMONWEALTH AVE, BOSTON, MA 02115**

DoN Project No: **02 – 4931**

Satellite Name: **PLANNED PARENTHOOD OF CENTRAL MASSACHUSETTS**  
Satellite Address: **470 PLEASANT STREET, WORCESTER, MA 01609**

Facility Name: **REPLACEMENT SATELLITE CLINIC**

Submission Date: **06/27/08**

## **Part II - PROJECT NARRATIVE**

Planned Parenthood League of Massachusetts's Satellite Clinic in Worcester, Planned Parenthood of Central Massachusetts, is seeking approval to relocate from 631 Lincoln Street in Worcester to 470 Pleasant Street in Worcester. To this end, a Determination of Need Application (number 2-4931) has been filed as of February 29, 2008. The clinic is currently licensed to provide both gynecological and abortion services.

Since 1982, PPLM's Worcester health center has been providing health care, education programs and advocacy to protect women's health and freedom. Not only was Worcester the site of PPLM's first health center, but it was the first freestanding clinic in the city to provide comprehensive sexual health services. To this day, we remain the only health care provider in Worcester that is focused solely on sexual health.

Our integrated approach – combining clinical work with prevention-focused education and advocacy work to improve the legislative climate for sexual health in MA and nationally helps to reduce unintended pregnancies and sexually transmitted infections (STIs) and keeps women and young people in Central Massachusetts healthy and safe.

We have been at our current location, 631 Lincoln Street, since 1993, and we employ approximately 40 staff members there, 90% of whom are residents of Worcester or the surrounding Central Massachusetts area. Our Worcester health center clinicians saw 6,713 patients during 10,323 visits in FY07. Nearly two-thirds of visits were for prevention services, such as contraception and cervical cancer screenings. Our patients in Worcester reflect the diverse demographics of the area: 28% of our Worcester health center patients last year were non-white, compared to 23% of city residents overall.<sup>1</sup> For many low-income or uninsured women, PPLM is their sexual health care provider of choice – only 26% of patients used private health insurance to pay for their visits last year.

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<sup>1</sup>[1] U.S. Census Bureau: State and County QuickFacts.

We provide a full range of compassionate, affordable, high-quality sexual and reproductive health services, prevention-focused sexuality education programming, and advocacy efforts. Our medical services include routine annual gynecological exams, cervical cancer screenings, testing and treatment for STIs, HPV vaccinations, contraception, pregnancy testing and pregnancy options counseling, abortion services and HIV testing and counseling.

Testing completed at the facility includes low and moderate level testing, such as pregnancy tests, Rh typing, and HIV rapid result blood tests. Samples for these tests will be collected in the "One-rooms" but will be analyzed in the testing station. We are CLIA licensed. Tests such as pap smears are sent to an outside lab for analysis. Gynecological exams include cancer screenings, pelvic exams, pap smears, and infection checks. Abortion care includes ultrasound for gestational age dating, medication abortion provision, therapeutic abortion (TAB) up to 18.6 weeks gestational age, and associated follow up care. For TAB care, patients have the option of receiving IV conscious sedation during the procedure. General anesthesia is never used at our facility. Currently, TAB patients are discharged by a nurse in the phase II recovery room. In the new facility, most recovery will be undertaken with in the One-Rooms. However, for times of maximum demand or when scheduling necessitates a quicker turn-over, the new facility provides an 'over-flow' recovery room with four reclining chairs. Discharge will also take place in the one room, if the patient has recovered there, with the assistance of a nurse. All patients who receive IV conscious sedation, and patients who have difficulty walking, will be assisted by a wheelchair. We do not transport patients throughout the facility on a stretcher. We therefore do not store a stretcher in our facility, nor do we accommodate space for a stretcher to be maneuvered through our corridors. No medical gasses are routinely used in any exams or procedures. Only conscious sedation is used for TAB procedures. Clinicians, physicians, nurses and medical assistants routinely use hand washing sinks and hand sanitizer from conveniently located dispensers upon entering and exiting patient areas. Because the types of procedure we do at our facility are non-invasive, we do not require scrub facilities.

The new Planned Parenthood of Central Massachusetts Clinic offers many quantitative and qualitative improvements over the existing Worcester facility. These improvements will allow Planned Parenthood to offer better services to their patients in an environment that is healthier, safer, and more efficient. While improving the patient experience the building will also improve the working experience for the Planned Parenthood staff.

The existing clinic location is not convenient for pedestrian or bus use and only partially accommodates the current parking demand. The building and parking lot is exposed to the street and protest activities. The existing building was not built as a health center and has been retrofitted to accommodate Planned Parenthood's program. Many existing spaces lack access to light and air, lowering staff efficiencies and decreasing the overall patient experience. Over time the facility has become overcrowded and outmoded, while problems due to inherent site disadvantages have intensified.

The new clinic offers Planned Parenthood the opportunity to construct a facility designed to their specific needs. The building will accommodate clinical and administrative functions in new construction totaling approximately 10,900 gross square feet. While the overall increase in size of the facility is modest, the new building offers more useable space in a more efficient design that allows Planned Parenthood to also take advantage of the "privacy aloft" concept, providing a level of security and safety far beyond what the existing site could offer.

The advantages of the new facility begin with the location on Pleasant Street. The new location is more central to downtown Worcester and offers easy pedestrian access, bus access, and more on-site parking supplemented by available on-street parking. A curb cut to the rear of the property provides more a more private entry.

In addition, the new building is designed for greater operational efficiency as well as an enhanced experience for patients, staff, and visitors. Security will be improved by the provision of a ground-level entry separate from the rest of the facility which is on two upper levels removed from the street. Bullet proof glass will be used all ground-level windows. Concrete block walls at the ground-level guard and pill sales areas will afford additional security.

On the upper levels, the new building will afford many functional improvements. Reception and waiting areas will be larger and sunnier, providing improved work space for staff and expanded seating for family members and interpreters. South-facing windows and sliding glass doors will afford light and air. Storage will be consolidated and expanded, replacing 17 overcrowded and insufficient storage areas in the existing facility. Administrative space will be expanded by additional meeting space and an open office area that allows for staff growth. The new staff lounge will be larger with windows providing direct light, air and views.

Clinical space will include staff changing rooms and bathrooms, staff lounge, reception space, waiting area, central nurse workstation, secure medical records storage, lab support, clean utility, dirty utility, linen storage, and general storage. The staff locker room will have more space for changing, bathrooms and a uni-sex shower. Lockable medical records cabinets in a conveniently located day lit space replace the windowless alcove in the existing facility. The central area will be consolidated and expanded allowing for better healthcare delivery. All plumbing will be upgraded and designed to avoid the current clogging problems.

In addition to the conventional clinical facilities listed above, the new building will provide seven patient suites or "One-Rooms" for use by both medical gyn and abortion patients. These facilities will support an innovative delivery model that streamlines staff services and allows the patient to remain in a single location for their entire visit. For pre-treatment procedures and times when scheduling necessitates quicker turn-over of the One-Rooms, the new building provides a convenient over-flow recovery room with four reclining chairs.

The One-Rooms and their associated semi-private patient bathrooms consolidate nine previously separate patient and staff functions: patient changing, patient waiting, laboratory testing, ultrasound, patient education, medical examination, treatment, recovery, and discharge.

One-Rooms require no more space than the original program allocated for these separate functions. At the same time, One-Rooms eliminate the need for patients to move between separate rooms as many as a dozen times during a single visit. This ensures privacy, reduces stress, lessens fatigue, promotes recovery, and eases care. In short, it creates a significantly improved healing environment.

Staff functions are also streamlined. One-Rooms contain decentralized equipment and storage, supporting the delivery of examinations, procedures, and recovery as a continuous team effort among physicians, nurses, medical assistants, and patient educators.

Because they are somewhat larger than minimum dimensional requirements, One-Rooms providing more room for clinical staff and equipment as well as accompanying family members and language translators. This further enhances healthcare delivery. Each One Room meets the applicable requirements for both a medical clinic examination room and an ambulatory surgical facility procedure or operating room appropriate for the procedures performed at the clinic.

Each One Room has three overlapping spaces:

- Relaxation – for waiting and recovery, furnished with a reclining chair.
- Resource – for patient education and discharge, furnished with a table, seats, and shelving.
- Reclining – for ultrasound, medical exams and procedures, furnished with an exam table.

The new clinic will provide Planned Parenthood of Central Massachusetts more space to provide a higher level of patient services, with greater efficiencies so that they may do their jobs more easily, and in an environment that will make both the patients and staff happier, safer, and more healthy. It is the hope of Planned Parenthood that the new facility will be equal to level of quality that they provide to their patients, and that it will be a proud representation of the work that they do.

#### **Abbreviated Plan Review - Part II revisions**

To following items clarify issues raised in the Design Development Drawing Review:

- The function of the control station will be provided by the control desk at the waiting and reception area. The treatment floor is accessed from the elevator and the stairs by swipe card only. The reception/control station will have visual surveillance of all traffic entering the facility or being escorted up to the treatment floor.
- The recovery functions for the facility will be provided in the One-Rooms. However, for times of maximum demand or when scheduling necessitates a quicker turn-over, the new facility provides an 'over-flow' recovery room with four reclining chairs. A total of 11 recovery spaces will be provided for the 7 procedure rooms served by the single physician.
- The patient changing function will be provided in the One-Rooms. The relaxation spaces with loose furniture, lounge chairs and coat hooks will facilitate private patient changing. Once the patient has been escorted to the One-Room the nursing staff will withdraw, giving the patient full privacy, and will not re-enter the One-Room until the patient is fully changed. All patient belongings will remain in the One-Room until the patient visit is complete. Should a patient be transferred to the Over-flow recovery room their personal effects will be moved with them.
- The Staff Clothing Change Area has direct access to and from the dedicated Staff Stair. Entered by swipe card only, this stair ensures the nursing staff a secure and direct passage to the third floor.
- The types of procedure at the facility are non-invasive.