



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 8 1/4" 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.

PLAN - at Springfield Technical Community College, 1 Armory Square, Bld 20/Suite 320, Springfield MA 01105

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

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

Hospital/Clinic Department Building/Floor Location

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

1.A: FOUND AT: 105CMR (Section E) 140.560 (Regulation/Requirement Citation)

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

- 2) Records on outreach patients shall be maintained on the premises of parent clinic. Records shall not be stored at the outreach site.
3) Medications shall not be stored or administered at the outreach site.
4) Mental Health regulations, 140.560 do not permit onsite lab tests.

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:

- 2). Patient charts will be stored onsite in HIPAA compliant, locked storage space.
3). We will store hormonal birth control, emergency contraception, gonorrhea and chlamydia treatment onsite ensuring adequate refrigeration as necessary. All items to be stored in locked cabinets.
4) We would like to provide waived laboratory tests at our new health center (PLANat Springfield Technical Community College (STCC) including urine pregnancy testing and HIV OraQuick tests. Each box of pregnancy tests will be controlled at the Planned Parenthood Lab at our 3055 Main Street, Springfield location before being transported to our PLAN clinic at STCC. Each test also has an internal control. Similarly, we would ensure that two external controls are performed on site anytime we offer ORAQUICK testing at our PLAN STCC site. We would also like to collect urine samples for chlamydia and gonorrhea testing as well as blood samples for identifying herpes antibodies, syphilis and hepatitis B & C. Samples will be picked up daily at STCC by our lab provider, QUEST. We believe that the ability to provide urine and blood testing will enable Planned Parenthood to meet public health needs in another location in Springfield.

PLAN: A Planned Parenthood Express Center at STCC, 1 Armory Sq. Bld 20, Suite 320, Springfield MA 01105

Facility's Licensed Name or Proposed Name

Address, including zip code

Regulation/Requirement Citation:

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

- 2) Storing medical records on site at STCC allows the Planned Parenthood clinician to efficiently review medical history in order to provide quality care for patients through walk-in visits.
- 3) Planned Parenthood dispenses hormonal contraception, emergency contraception and treatment for gonorrhoea and chlamydia on-site at all four of our health centers in the state. Contraceptive consultations with clinicians will be the primary service offered at the new PLAN Express Center at STCC and on-site dispensing is an integral part of this service to meet patient needs from a convenience perspective.
- 4) Providing on-site pregnancy, urine and blood testing for gonorrhoea, chlamydia, herpes antibodies, syphilis and hep B & C will enable Planned Parenthood to meet public health needs in another location in Springfield.

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:

N/A

FACILITY AUTHORIZED REPRESENTATIVE:

Name: Meagan Gallagher
 Title: Chief Operating Officer/Vice President
 Mailing Address: 1055 Commonwealth Avenue
Boston, MA 02215-1001

Signature:

FACILITY CLINICAL REPRESENTATIVE:

Name: Karen Loeb Lifford, MD
 Title: Medical Director
 Tel #: 617-616-1620

Signature:

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

Evaluated by: Ellen Klenta 10/18/06 Approved Approved w/Conditions Denied

Reviewed by: Jill Pappas 10/18/06 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.

Compliance Checklist: Mental Health Clinics

ARCHITECTURAL REQUIREMENTS

OUTPATIENT SUPPORT AREAS

Note: Compliance Checklist OP1 must be completed and attached to this Checklist.

- 9.2.B1 **COUNSELING ROOMS**
- 140.203 min. 80 sf
- 9.1.H ensure sight & sound privacy between each counseling room and adjacent areas

- 9.2.B6 **DRUG DISTRIBUTION STATION**
 - check if service not included in project
 - work counter
 - locked storage
 - refrigerator
 - under visual supervision from staff station
- Policy

TESTING

- 9.2.D Urine collection station
 - check if service not included in project
 - 9.2.D1 work counter
 - 9.2.D3 storage cabinets
 - 9.2.D4 urine collection toilet room
 - equipped with shelf
 - Blood collection station
 - check if service not included in project
 - patient seating space
 - work counter
 - storage cabinets
- Policy

DAY TREATMENT PROGRAM

check if service not included in project
 total number used for compliance with following space requirements = number of patients per day

- 7.6.B7 **Social Spaces:**
- ___ noisy activity/dining room(s)
- ___ quiet activity room(s)
- ___ min. combined area 40 sf/patient
- ___ min. area each space 120 sf

- 7.6.B8 **Group therapy space:**
- ___ GT separate room or ___ max. 12 patients per day
- ___ min. 225 sf and ___ quiet activity room min. 225 sf
- ___ GT combined with quiet activity

- 7.6.B12 **Therapy/multipurpose space:**
- ___ separate room or ___ max. 12 patients per day
- ___ min. 15 sf/patient ___ noisy activity room meets [7.6.B6] + 10 sf/patient
- ___ min. 200 sf ___ noisy activity & therapy functions are combined within one room
- ___ work counter, storage, and display

MECHANICAL/PLUMBING/ELECTRICAL REQUIREMENTS

Vent. min. 6 air ch./hr

Handwashing station
 Duplex receptacle(s)

Handwashing station

Handwashing station
 Vent. min. 10 air ch./hr (exhaust)

Handwashing stations
 Vent. min. 6 air ch./hr (exhaust)

___ Vent. min. 6 air ch./hr
 ___ Vent. min. 6 air ch./hr

___ Vent. Min. 6 air ch./hr

___ Vent. min. 6 air ch./hr

___ Handwashing station

ARCHITECTURAL REQUIREMENTS**(DAY TREATMENT PROGRAM Continued)**

- 7.2.B15 Nourishment area:
 work counter
 storage cabinets
 refrigerator
 equipment for hot nourishment
 space for holding dietary trays
- 7.6B3 used by patients or not used by patients
 staff control of heating/cooking devices

**MECHANICAL/PLUMBING/
ELECTRICAL REQUIREMENTS**

- Handwashing station conveniently accessible
 Vent. min. 4 air ch./hr

GENERAL STANDARDS**Details and Finishes**

- Outpatient corridors (9.2.H1.a)
 min. corridor width 5'-0"
 Staff corridors
 min. corridor width 4'4"
- Two remote exits from each outp. facility suite & floor
 Fixed & portable equipment recessed does not reduce required corridor width (9.2.H1.c)
 Work alcoves include standing space that does not interfere with corridor width
 check if function not included in project
- Doors:
 doors min. 3'-0" wide (9.2.H1.d)
 all doors are swing-type (Policy)
 doors do not swing into corridor (Policy)
- Glazing (9.2.H1.e):
 safety glazing or no glazing under 60" AFF & within 12" of door jamb
 safety glazing or no glazing in recreation rooms
- Thresholds & expansion joints flush with floor surface
- Vertical clearances (9.2.H1.j):
 ceiling height min. 7'-10", except:
 7'-8" in corridors, toilet rooms, storage rooms
- Floors (9.2.H2.c):
 floors easily cleanable & wear-resistant
 washable flooring in rooms equipped with handwashing stations (Policy)
 non-slip floors in wet areas
 wet cleaned flooring resists detergents
- Walls (9.2.H2.d):
 wall finishes are washable
 smooth/water-resist. finishes at plumbing fixtures

Mechanical (9.31.D)

- Mech. ventilation provided per Table 7.2
 Exhaust fans located at discharge end
 Fresh air Intakes located at least 25 ft from exhaust outlet or other source of noxious fumes
 Contaminated exhaust outlets located above roof
 Ventilation openings at least 3" above floor
 Central HVAC system filters provided per Table 9.1

Plumbing (9.31.E)

- Handwashing station equipment
 handwashing sink
 hot & cold water
 single lever or wrist blades faucet
 soap dispenser
 hand drying facilities
- Sink controls (9.31.E1):
 hands-free controls at all handwashing sinks
 blade handles max. 4 1/2" long

Electrical (9.32)

- All occupied building areas shall have artificial lighting (9.32.D3)
 Emergency power complies with NFPA 99, NFPA 101 & NFPA 110 (9.32.H)

Outreach Clinic Proposal: Program Description
October 11, 2006

Planned Parenthood League of Massachusetts (PPLM) proposes to open an “express clinic” at Springfield Technical Community College’s (STCC) Department of Health Services. The outreach clinic would offer similar services now provided by PPLM at our express clinic in Cambridge/Somerville in Boston, the STCC site is a collaboration between the community college and PPLM to provide services to students and other members of the Springfield community.

- **Services & Staffing:** PPLM would send a PPLM–employed Nurse Practitioner and a PPLM-employed Clinic Assistant to STCC for 4 hours per week to provide hormonal contraception with optional pelvic exam (HOPE), Emergency Contraception (EC), Pregnancy Testing, HIV and Gonorrhea/Chlamydia urine screening, blood screening for Herpes antibodies, Syphilis and Hepatitis B & C as well as referrals for comprehensive visits. Birth control methods and emergency contraceptive pills will be dispensed to clients at the time of the initial visit.
- PPLM’s HOPE protocol requires that a Clinician discuss the risks and benefits of different birth control method options with the patient and a Nurse Practitioner review the client’s medical history, check the client’s blood pressure and provide a prescription for and instructions for use of the birth control method selected by the client.
- PPLM’s EC protocol requires that a Clinician discuss available birth control methods with the client and a Nurse Practitioner review the client’s medical history; provide a prescription for and instructions for use of emergency contraception.
- Department of Public Health Clinical Laboratory Program informed us that PPLM is able to provide pregnancy testing and HIV and Gonorrhea/Chlamydia screening in this type of setting per our existing CLIA license #22D0067630.
- **Space Requirements:** PPLM staff would have use of the exam rooms and storage for medication, birth control and medical records at the STCC Health Services Center.
- **Licensure:** The PPLM Express Clinic in Somerville, Boston succeeds in increasing access to contraceptive services by making them physically and economically accessible. PPLM seeks to expand the scope of this service delivery model to other community based organizations that target high risk populations for unplanned pregnancies and sexually transmitted infection as well as to the general public by opening sites in the community that can be accessed by anyone in need of these services. This community presence would be developed through sites in commercially rented space or existing health center space such as the STCC site.
- **Project Sustainability:** This project has the full support of PPLM, a statewide organization with predecessor organizations dating back 75 years. As an established organization, PPLM currently has the clinical and administrative infrastructure in place to



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support this project. PPLM is confident that this effort will improve access to critical family planning services in communities with identified needs.

PPLM Contact: Meagan Gallagher, Chief Operating Officer: 617-616-1662

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**Plan: A Planned Parenthood
Express Center**
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