Missouri Department of Health and Senior Services
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Peter Lyskowski
Director

Jeremiah W. (Jay) Nixon
Governor

November 2, 2016

Vicki Casey (vicki.casey@ppgreatplains.org)
Comprehensive Health of Planned Parenthood Great Plains
1001 Emanuel Cleaver II
Kansas City, MO 64110

Re: Comprehensive Health of Planned Parenthood Great Plains – Kansas City survey

Dear Ms. Casey:

The Department received the application for licensure of the Kansas City Planned Parenthood location (Brous Center) as an abortion facility. Department staff conducted an onsite survey of the facility on October 19, 2016 to determine compliance with the terms of the 2010 settlement agreement and applicable statutes and regulations, including the Ambulatory Surgical Center Licensing Law (Section 197.200, RSMo, et seq.) and Chapter 188, RSMo (Regulation of Abortions).

Listed below are items the survey indicated were not in compliance. Until a written response is provided describing how all items below have been addressed, including acceptable evidence of compliance, an abortion facility license cannot be issued.

19 CSR 30-30.060(1)(B)12. The administrator shall be responsible for ensuring that the provisions of Chapter 188, RSMo, Regulation of Abortions, are adhered to.

- Sections 188.027 and 188.080, RSMo, require that all physicians performing or inducing abortions have clinical privileges at a hospital which offers obstetrical or gynecological care located within thirty miles of the location at which the abortion is performed or induced. The credentialing file documents provided by your staff show that one of the physicians who would be performing abortions had clinical privileges at a hospital within 30 miles of the Brous Center. Regarding the other physician who would be performing abortions, the credentialing file documents indicated the physician has privileges at a hospital within thirty miles but do not specify whether the privileges are clinical in nature.

Regarding physician privileges at the Brous Center, the 2010 settlement agreement (page 19) states, "PPKM represents that medication abortion at the Brous Center is provided by a physician licensed to practice in Missouri who has privileges to perform surgery either at Menorah Medical Center or Research Medical Center. This will fulfill the physical presence requirements of 19 CSR 30-30.060(3) and (3)(A) and (3)(D) and the staff privileges requirement of 19 CSR 30-30.060(1)(C)4."

The facility failed to document that it meets the above requirement of the settlement agreement:

- The facility had two physicians on staff who would perform abortions. One physician did not have privileges at either Menorah or Research Medical Centers. The other physician apparently has some type of privileges at Menorah, but the documents provided do not specify the type of privileges, (e.g., staff, surgical).

19 CSR 30-30.0601(B)8. The facility shall establish a program for identifying and preventing infections and for maintaining a safe environment.

The facility failed to demonstrate compliance with facility's established Infection Prevention Program, based on Association for the Advancement of Medical Instrumentation standards.

- The facility failed to establish a traffic pattern in the decontamination/sterilization room that prevented cross contamination between contaminated and clean instrument processing.
- The facility failed to establish a policy for the process of high level disinfection of semi-critical instruments and equipment using OPA (ortho-phthalaldehyde) solution that included cleaning, disinfecting, rinsing, drying and storage.
- The facility failed to ensure staff followed the policy for utilization of PPE (personal protective equipment) during decontamination of soiled instruments. The appropriate PPE was not available in the instrument decontamination/sterilization room.
- The facility failed to follow safe medication practices by storing medications in the decontamination/sterilization room, and storing medications side by side in the refrigerator and locked cabinet with laboratory reagents and miscellaneous supplies.
- The facility failed to package semi-critical equipment (vaginal speculums) to protect from cross-contamination during storage.
- The facility stored supplies in corrugated boxes in the decontamination/sterilization room.

Please respond in writing providing evidence/documentation that each of these items has been fully addressed and corrected.

If you have further questions, you may contact our office at 573-751-6083 or via email at the address noted below.

Sincerely,

John Langston, Administrator
John.Langston@health.mo.gov
Bureau of Ambulatory Care
Missouri Department of Health & Senior Services