

Pennsylvania Department of Health

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION (POC)		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 8-3910	(X2) MULTIPLE CONSTRUCTION: A. BLDG: <u>00</u> B. WING: _____	(X3) DATE SURVEY COMPLETED: 02/23/2015
NAME OF PROVIDER OR SUPPLIER: PPKEY - ALLENTOWN		STREET ADDRESS, CITY, STATE, ZIP CODE: 29 NORTH 9TH STREET ALLENTOWN, PA 18101		
STATE LICENSE NUMBER: 00218701				
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE	(X5) COMPLETE DATE
M 0000	INITIAL COMMENT This report is the result of an Annual Registration survey conducted on February 23, 2015, at Planned Parenthood Keystone - Allentown (PPKey - Allentown). It was determined the facility was not in compliance with the requirements of the Pennsylvania Department of Health Regulations § 28 Pa Code, Chapter 29, Subchapter D, Ambulatory Gynecological Surgery in Hospitals and Clinics.	M 0000		
M 0032		M 0032		
LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE		TITLE:		(X6) DATE:

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M 0032	Continued from page 1 29.43(b) Facility Approval All medical facilities except hospitals may become approved facilities upon submission of an application to the Department from a person authorized to represent such facility and, at the discretion of the Department, satisfactory completion of an on-site survey. This REGULATION is not met as evidenced by:	M 0032	1. Of the four employee records cited as deficient at the time of the inspection, all are deemed in compliance with PPKey's Pre-Screening policy dated July 1, 2014 (03/16/2015). 2. An ongoing analysis is being conducted to determine how similar deficiencies can be prevented in the future and the following procedures are being implemented effective immediately (estimated completion date of analysis - 03/24/2015). Our existing policy has been that employees who have significant likelihood of regular contact with children in the form of care are not permitted to be alone with a minor prior to receiving the following: I) PA State Police Clearance, II) Department of Public Welfare Childline Clearance, and III) Federal Criminal Background Check. a) Existing personnel staff files are being reviewed to verify compliance with the above policy.	Completion Date: 04/06/2015 Status: APPROVED Date: 03/18/2015

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M 0032	Continued from page 2	M 0032	<p>b) Employees will be hired conditionally upon receipt of these checks; however, the employee's failure to submit the Federal Criminal Background Check to HR within 60 days will result in unpaid administrative leave until the check is returned to HR. In addition, any employee in the conditional 60 day employment status will be prohibited from treating or caring for minors unaccompanied; this will be enforced and monitored by the direct supervisor.</p> <p>3. Human Resources (HR) will ensure that employees are being checked for I) and II) above. HR will also ensure that employees are being registered for the Federal Criminal Background Check and that the conditional employment procedure listed above is enforced. The direct supervisor will be responsible for ensuring that the Federal Criminal Background Check is completed and returned to HR (03/11/2015).</p>	

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M 0032	Continued from page 3	M 0032	<p>4. Monitoring activities:</p> <p>a) A review of the employee's record will be performed by HR 30 days from when an employee is hired conditionally. The direct supervisor and respective head of the department will be notified of the status (continued or expired) conditional employment (03/11/2015).</p> <p>b) A review of the employee's record will be performed by HR 60 days from when an employee is hired and at that time it will be determined if the employee will be placed on unpaid administrative leave(03/11/2015).</p> <p>c) Personnel File Audits, typically focused on new and recent hires, will continue to be submitted quarterly at the RQM meetings (next scheduled meeting is 04/29/15).</p> <p>5. The inability to obtain a clean background check may result in candidate not being hired or the</p>	

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M 0032	Continued from page 4	M 0032	<p>termination of an employee already hired (03/11/2015).</p> <p>6. This plan of correction will be reviewed at the next scheduled Governing Board meeting (04/25/2015) and the next scheduled quarterly RQM meeting (04/29/2015).</p>	

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M 0032	Continued from page 5 Based on review of facility documents, credential files (CF), personnel files (PF), and staff interview (EMP), it was determined the facility failed to have copies of Federal Criminal Background Checks for two of seven credential files reviewed (CF2 and CF7) and for two of seven personnel files reviewed (PF4 and PF5). Findings include: Review on February 23, 2015, of the "Planned Parenthood Pre - Employment Checks" policy, dated July 1, 2013, revealed "Policy: ... Planned Parenthood complies with all applicable federal and state laws pertaining to background checks, including providing the job applicant or employee with required notices and forms. Therefore, It [sic] is Planned Parenthood's policy to process background and reference checks on all final candidates for employment or final candidates for contracted work. Procedure: 1. Background Checks - All positions require background checks ... The Applicant Background Checklist will be used	M 0032		

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M 0032	Continued from page 6 by HR [Human Resources] to document the background check process and will be filed in the personnel file if the candidate is hired. A. All background checks are completed prior to employment. However, HR and/or the CEO can make an offer of employment contingent upon the completion of any pending background checks. i. Employees on conditional employment who have a significant likelihood of regular contact with children will not be permitted to work alone with children until all background check information is received and reviewed. ii. If hired conditionally, the employee must sign the Conditional Employment Form at hire. iii. The term of conditional employment shall not exceed a maximum of 30 days for PA state residents or 90 days for out of state residents. ... c. In accordance with the Child Protective Services Law, all employees who have a significant likelihood of regular contact with children in the form of care, guidance, supervision or training must obtain the following three background checks as condition of employment: (1) PA State Police Clearance, (2) Department of Public Welfare Childline Clearance,	M 0032		

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M 0032	Continued from page 7 and (3) Federal Criminal Background Check. ... iii. HR will assure completion, review results, and retain a copy of each of the background checks. ... e. All required background checks are documented and stored in the employee personnel files or independent contractor records. ..." Review on February 23, 2015, of CF2 revealed this practitioner was hired in 2010. Further review of CF2 revealed no copy of CF2's Federal Criminal Background Check. Review on February 23, 2015, of CF7 revealed this practitioner was hired in March 2014. Further review of CF7 revealed no copy of CF7's Federal Criminal Background Check. Review on February 23, 2015, of PF4 revealed this employee was hired in 2012. Further review of PF4 revealed no copy of PF4's Federal Criminal Background Check. Review on February 23, 2015, of PF5 revealed this	M 0032		

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M 0032	Continued from page 8 employee was hired in August 2014. Further review of PF5 revealed no copy of PF5's Federal Criminal Background Check. Interview with EMP2 at approximately 1:00 PM on February 23, 2015, confirmed CF2, CF7, PF4 and PF5 did not have copies of their Federal Criminal Background Checks in their employee files. Interview with EMP1 at approximately 1:30 PM on February 23, 2015, confirmed the facility policy stated all employees will have a copy of the three required background checks in their employee files, and these employees were permitted to work alone with children.	M 0032		



Certified End Page

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SURVEY EXIT DATE: 02/23/2015

I Certify This Document to be a True and Correct Statement of Deficiencies and Approved Facility Plan of Correction for the Above-Identified Facility Survey

Christine C. Filipovich, MSN, RN

*Christine C. Filipovich, MSN, RN
Deputy Secretary For Quality Assurance*

Karen M. Murphy, PhD, RN

*Karen M. Murphy, PhD, RN
Secretary of Health*



THIS IS A CERTIFICATION PAGE

PLEASE DO NOT DETACH

THIS PAGE IS NOW PART OF THIS SURVEY