Abortion Care

Companion Document for AbortionCare Certification Requirements



March 2023



Companion Document for AbortionCare Certification Requirements Table of Contents

Section A. Facility, Operations, & Staffing	3
Section B. Equitable Access	7
Section C. Enrollee's Rights & Safety	10
Section D. Services	11
Section E. Data Collection & Reporting	13
Section F. Reproductive Health Access Fund	14

This document is meant to be used together with the AbortionCare Certification Requirements. It includes strategies and resources to assist your clinic in meeting the requirements. This is not a comprehensive guide, nor does it address each requirement. Further, it is not a prescribed checklist of items or ideas, rather this document is intended to help support your efforts. The strategies in this document are not required.

Section A: Facility, Operations & Staffing

A.1 Clinic Space

- Arrange the waiting room to provide multiple waiting spaces.
- Arrange furniture such as tables, chairs, vending machines, and display racks so that wheelchairs, and people in other assistive devices can maneuver around them easily.
- Ensure signs use high-contrast colors, sans-serif fonts, pictograms, and braille if possible.
- Provide comfortable seating.
- ♦ Paint the walls a cheerful color.
- Display images of people who reflect the various identities of your clinic's client population (e.g. race, ethnicity, gender identity, sexual orientation, body sizes, abilities/disabilities).
- Display non-discrimination messaging that equal care will be provided no matter a person's ability/disability, race/ethnicity, sexual orientation, gender identity, religion, or income.
- ♦ Label the bathrooms gender neutral, or otherwise specifically state that clients may choose the women's or men's rooms according to their own preference.
- Provide <u>ADA training</u> for all clinic staff; assess clinic facility and services for ADA compliance; ensure physical access to medical care for people with mobility disabilities; and ensure effective communication for people who are deaf or have hearing loss.

Resource(s):

California HealthCare Foundation, Improving the Patient Experience: Best Practices for Safety-Net Clinic Redesign: https://www.chcf.org/wp-content/uploads/2017/12/PDF-SafetyNetDesign.pdf

Gay and Lesbian Medical Association, Guidelines for Care of Lesbian, Gay, Bisexual, and Transgender Patients: http://www.glma.org/ data/n 0001/resources/live/Welcoming%20Environment.pdf

ADA Checklist for Existing Facilities: https://www.adachecklist.org/doc/fullchecklist/ada-checklist.pdf
Health Care and the Americans with Disabilities Act: https://adata.org/factsheet/health-care-and-ada

Recommendations for Trauma-Informed Design: https://healingattention.org/wp-content/uploads/Trauma-Informed-Design-Summary.pdf

A.2 Infection Control

- ◆ Ensure that written policies and procedures for Infection Control include all <u>Standard</u> <u>Precautions</u> elements.
- ◆ Use the <u>CDC's Infection Prevention and Control Assessment Tool for Outpatient</u>
 <u>Settings</u> to evaluate the clinic's infection control programs and practices and to guide quality improvement efforts.
- ◆ Maintain <u>staff proficiency</u> on infection control and prevention topics.

A.3 Laboratory

- Ensure that the clinic's laboratory maintains appropriate CLIA certification.
- ◆ Develop and maintain written procedures for all tests performed in <u>waived</u> or <u>Provider-Performed Microscopy Procedures</u> (PPMP) laboratories, as applicable.
- ◆ Have a laboratory manual available that demonstrates how the clinic's laboratory meets CLIA regulations.
- Ensure staff performing any laboratory tests are provided an orientation when hired, as well as ongoing competency assessments on laboratory policies and procedures, and additional training when laboratory tests are added or changed.

Resource(s):

Center for Disease Control and Prevention. 2011. Ready? Set? Test! Patient Testing is Important booklet: http://wwwn.cdc.gov/clia/Resources/WaivedTests/pdf/ReadySetTestBooklet.pdf

A.4 Pharmacy and Dispensing Medications and Contraceptive Methods

- Ensure licensed staff who dispense medication follow <u>Oregon Board of Pharmacy</u> <u>rules</u> on ordering, maintaining an inventory, controlling access, and storing medication and contraceptive devices.
- Have a written process for ordering, maintaining inventory (for separate stocks, if applicable), disposing, and dispensing of supplies.
- Maintain an inventory log for each individual medication and for each dosage (if more than one dosage is stocked). Conduct a monthly inventory review.

◆ Take into account <u>logistical and operational considerations</u> before deciding to mail medications.

Resource(s):

Reproductive Health Access Project's step-by-step guide for ordering mifepristone: https://www.reproductiveaccess.org/resource/order-mifepristone/

Reproductive Health Access Project's mifepristone inventory log: https://www.reproductiveaccess.org/resource/mifepristone-log/

A.5 Clinic Licensure/Certification

◆ Ambulatory surgical centers must hold the appropriate licensure from the Oregon Health Authority's <u>Health Facility Licensing and Certification Program</u>.

A.6 Emergencies

- Keep plans for medical emergencies available for staff to review.
- Ensure the plans meets applicable standards established by federal, state, and local governments (e.g., local fire, building, and licensing codes).
- Review the plans with staff covered under the plan on a routine basis (e.g., upon hire, when staff's responsibilities under the plan change, when the plan is changed).
- ♦ Conduct <u>emergency drills</u> routinely.
- Ensure that staff have Basic and/or Advanced Cardiovascular Life Support certification according to their clinic role or license.
- Provide staff training opportunities to use AED in medical emergency drills.
- ◆ Train staff to understand their role in an emergency or natural disaster and be able to identify emergency exit routes.
- Encourage outreach and possible co-training with a community fire department.
- ◆ Become familiar with <u>OSHA standards</u> for exit routes, emergency action plans and fire prevention plans.
- If providing procedural abortions, ensure medical emergency plans address protocols and procedures related to perforation.

Resource(s):

National Abortion Federation 2022 Clinical Practice Guidelines, Emergency Procedures (section 14): https://prochoice.org/providers/quality-standards/

Society of Family Planning Clinical Guidelines on Management of Postabortion Hemorrhage: https://www.contraceptionjournal.org/article/S0010-7824(12)00954-7/fulltext)

A.7 Reproductive Health Coordinator

- Read the RHC Competencies to gain an understanding of the scope of the role.
- ◆ Choose a staff person to fill the Reproductive Health Coordinator (RHC) role who is in a position of oversight and has some level of authority over all of the clinics participating AbortionCare.
- Develop relationships with front desk, billing, and clinical mangers to ensure that their staff stay up-to-date on program requirements.
- Incorporate AbortionCare updates into staff meetings.
- Schedule reminders for important deadlines, and other duties on the calendar.
- Reach out to other clinics to learn and share best practices around fulfilling RHC duties.

A.8 Staff Training Requirements

- Establish requirements and systems to ensure staff receive and complete the required trainings.
- Incorporate all required trainings into new staff orientation curriculum.
- Offer annual trainings and resources that maintain clinical knowledge and understanding of abortion services.
- ♦ Develop training logs to track staff participation.
- ◆ Training suggestions and tools to understand the requirements are on the RH
 Program's Training webpage.
- Ensure that all licensed health care professionals complete the required <u>Cultural</u> <u>Competence Continuing Education (CCCE)</u> determined by each health care professional board (HB 2011). <u>OHA-approved training opportunities</u> are updated regularly and meet AbortionCare training certification requirements.

Section B: Equitable Access

B.1 Access to Care

- Research and adopt best practices related to improving health care access, including clinic reorganization (e.g., processes/workflows for appointment-making, hours of operation, etc.) and client support (e.g., transportation assistance, online access to patient portals, etc.).
- Bookmark the RH Program's Find a Clinic webpage: <u>healthoregon.org/rhclinics</u>.
- ♦ Identify client-support funds, resources, or other internal mechanisms to assist clients with non-service related costs (e.g., travel, lodging, etc.). Examples include:
 - o Northwest Abortion Access Fund
 - o <u>National Network of Abortion Funds</u>
 - o ACCESS Reproductive Justice
 - o National Abortion Federation
- Hire dedicated outreach and enrollment assistance staff to engage uninsured individuals and assist them with enrolling in health care coverage.

Resource(s):

Toscos, Tammy et al. "Identifying Successful Practices to Overcome Access to Care Challenges in Community Health Centers: A "Positive Deviance" Approach." Health Services Research and Managerial Epidemiology, Vol. 5: 8 Mar. 2018. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5846905/

IOM (Institute of Medicine). 2015. Transforming health care scheduling and access: Getting to now. Washington, DC: The National Academies Press. https://www.ncbi.nlm.nih.gov/books/NBK316132/

B.2 Cultural Responsiveness

- Conduct an assessment of the cultural responsiveness of the clinic space, staff, client services, etc. Use the results to develop an action plan to improve weaknesses. Work with an outside contractor with expertise in this area to assist with the assessment. Assessment examples and resources include:
 - o RHNTC's Counter-Stereotype Imaging Agency Self-Assessment
 - o Cultural and Linguistic Competence Policy Assessment
 - o Tool for Organizational Self-Assessment Related to Racial Equity

- Ensure all clinic staff are aware of the agency's written, ongoing, comprehensive strategy to provide equitable, trauma-informed, culturally-responsive services and follow the plan.
- Ensure clinicians are aware of how to perform a <u>trauma-informed pelvic exam</u>.
- Prioritize the recruitment and hiring of staff who reflect the clinic's client populations and possess skills to effectively interact with the diversity of the clients you serve.
- Incorporate cultural responsiveness into staff evaluations.
- Engage all staff, including managers, in staff dialogue sessions about topics, including, but not limited to:
 - LGBTQAI+ cultural responsiveness,
 - o Trauma-informed care,
 - Working with youth
 - o Racism,
 - Implicit bias,
 - o Cultural humility, and
 - Historical and systemic oppression.
- Encourage staff to volunteer in the community and to learn about community members and other cultures during work time.

Resource(s):

Racial Equity Tools: https://www.racialequitytools.org/

Project Implicit: https://www.projectimplicit.net/

Sexual and Reproductive Health Care and Best Practices for Adolescents and Adults: https://www1.nyc.gov/assets/doh/downloads/pdf/ms/srh-clinical-guide.pdf

Gay Lesbian Bisexual and Transgender Health Access Project, Community Standards for the Provision of Quality Health Care Services to Lesbian, Gay, Bisexual, and Transgender Clients: http://www.glbthealth.org/CommunityStandardsofPractice.htm

Trauma Informed Oregon, Standards of Practice for Trauma Informed Care: https://traumainformedoregon.org/standards-practice-trauma-informed-care/

TEACH abortion training curriculum, Considerations for Person-Centered Care:

https://pressbooks.pub/workbook/chapter/considerations-for-person-centered-care/

Adolescent Health Initiative: https://www.umhs-adolescenthealth.org/improvingcare/youth-friendly-care/

Reproductive Health National Training Center: Support LGBTQ+ Clients with Affirming Language Job Aid: https://rhntc.org/resources/support-lgbtq-clients-affirming-language-job-aid

Trauma Informed Care in Practice: https://healthasahumanright.wordpress.com/2018/06/25/trauma-informed-care-in-practice/



Clinical Education Initiative. Prepared by Kyan Lynch, MD, MA. Transgender Inclusion Environmental Scan

Clinical Guide for Trauma-Informed Care: https://www.ctcfp.org/wp-content/uploads/TIC_Clinical-Guide_Final_508Compliant.pdf

Trauma-Informed Care - Non-Clinical Staff Encounters:

https://healthasahumanright.wordpress.com/2018/09/12/trauma-informed-care-non-clinical-staff-encounters/

B.3 Linguistic Responsiveness

- Employ bilingual staff, personnel, or volunteers skilled or certified in the provision of medical and clinical interpretation that meets the needs of clients who need language assistance or who otherwise need this level of assistance during all clinic encounters.
- ◆ Provide ongoing in-service trainings on ways to meet the unique needs of the community, including regular in-service sessions on how and when to access language services for individuals with limited English proficiency. Ensure that staff are fully aware of, and trained in, the use of language assistance services, policies, and procedures.
- Use culturally responsive language, including self-designated pronouns, to affirm clients' gender identity and expression. This applies to paper and electronic forms and medical records to the fullest extent possible.
- ◆ Incorporate the <u>National Culturally and Linguistically Appropriate Services (CLAS)</u> <u>Standards</u> into clinic operations.
- Practice universal precautions for health literacy.
- Develop process for identifying language(s) a client speaks (e.g. language identification flash cards or "I speak" cards) and add this information to the client's health record.
- ◆ Develop a process for <u>evaluating the quality of translated materials</u>.

Resource(s):

National Standards for Culturally and Linguistically Appropriate Services in Health and Health Care: A Blueprint for Advancing and Sustaining CLAS Policy and Practice:

https://thinkculturalhealth.hhs.gov/assets/pdfs/EnhancedCLASStandardsBlueprint.pdf

The Interagency Working Group on Limited English Proficiency: https://www.lep.gov/

Health Literacy Online: A Guide for Simplifying the User Experience: https://health.gov/healthliteracyonline/

Health Literate Care Model: <a href="https://health.gov/our-work/national-health-initiatives/health-literacy/h

Section C: Clients' Rights & Safety

C.1 Confidentiality

- Arrange the clinic space, including the client waiting room, so that clients may seek private areas to complete paperwork or have conversations with clinic staff.
 - Use a white noise machine to mask noises in client areas.
 - Use coverings on doors or windows.
 - Use non-descript doors for exam rooms so clients have less information on what services others are seeking.
 - Use barriers to ensure paperwork or computer screens with PHI are out of public view.
- Provide ongoing staff training on <u>Health Insurance Portability and Accountability Act</u> (HIPAA) policies and regulations to ensure compliance with all aspects of service provision.
- ◆ Become familiar with the <u>Oregon Confidential Communications Request</u> law in order to assist clients who do not want billing communications to be sent to the policy holder.
- When serving minors, ensure all clinic staff are familiar with minors' rights to access and consent to healthcare.
- ◆ Use the <u>RH Program's Sample Patient Bill of Rights</u>.

C.3 Informed Consent

- ♦ Adapt and adopt <u>sample informed consent forms</u> to assure compliance with informed consent requirements.
- Incorporate informed consent requirements into new staff orientation.
- Become familiar with best practices related to obtaining informed consent for telehealth.
 - Agency for Healthcare Research and Quality, Informed Consent Resources for Telehealth: https://www.ahrq.gov/news/telehealth-consent.html
 - National Family Planning and Reproductive Health Association, Telehealth Services and Obtaining Consent:

https://www.nationalfamilyplanning.org/file/Telehealth-services-and-consent-11132020.pdf?erid=2422660&trid=dfdce06c-d1e1-4f89-b46e-f8859a980b4f

Section D: Service Provision

D.1 Service Delivery

- ♦ Provide clinicians resources and/or opportunities for professional development in evidence-based, trauma-informed, inclusive, culturally-responsive and client-driven care.
 - <u>Teach-Back Method</u>: a practice based on the health literacy principles of plain language that confirms patient understanding and improves patient outcome.
 This method is also effective in ensuring the clinician can explain back to the patient what the clinician heard regarding the patient's preferences.
 - Shared decision-making model: a framework to improve the quality and outcomes of contraceptive counseling with a patient-centered approach.
 - Reproductive Health National Training Center, Telehealth Services: Taking an Inclusive, Equity-Driven, and Trauma-Informed Approach Job Aid: https://rhntc.org/resources/telehealth-services-taking-inclusive-equity-driven-and-trauma-informed-approach-job-aid
- Ensure that clinicians and educators are knowledgeable and competent to provide <u>contraceptive counseling</u> for gender nonconforming, gender-diverse, and transgender clients.

Resource(s):

Reproductive Health National Training Center: Gender Appropriate Language: Practical Skill Development Webinar: https://rhntc.org/resources/gender-appropriate-language-practical-skill-development-webinar

D.2 Clinical Services

- Provide opportunities for clinical staff to gain and maintain expertise in the provision of abortion services. Encourage staff to engage in online learning, in-person trainings, and other platforms like podcasts. Useful resources include:
 - o The National Abortion Federation's <u>continuing medical education resources</u>
 - Reproductive Health Access Project's <u>abortion resources</u>
 - RHEDI's <u>education and training resources</u> for both medication and procedural abortions

- The <u>Abortion Provider Toolkit</u> for Nurse Practitioners, Midwives, and Physician Assistants to integrate abortion into clinical practice
- o The TEACH <u>abortion training curriculum</u>
- ◆ Adopt and follow <u>clinical protocols</u>, <u>clinical policy guidelines</u>, and/or well-established <u>clinical guidance</u> for medication abortions and procedural abortions.
- Allow new clinical staff to shadow staff with expertise in abortion services.
- Have staff shadow clients during visits to better understand the client's experience and perspective.
- Connect with staff from other AbortionCare clinics to share and learn best practices.
- ♦ Consider the use of <u>telemedicine models</u> to increase access to medication abortion.

D.3 Counseling and Education Services

- Support clinician proficiency with evidence-based, client-centered education and counseling services, including:
 - The Framework: Counseling for Patient-Centered Abortion Care: a multimethod online course that teaches patient-centered pregnancy decision counseling in challenging patient scenarios.
 - Comparison of Early Abortion Options: an online interactive tool for a patientcentered approach to counseling around early abortion options.
- Use open-ended questions so that clients can express preferences, needs, or concerns regarding their reproductive well-being.
- ♦ Screen clients regarding current and past relationship safety. Develop referral lists and partnerships with local and regional services. Staff should be aware of how to access local domestic and sexual violence providers as well as understand what services are provided. Resources include:
 - CUES: An Evidence Based Intervention
 - RHNTC's Moving Beyond Screening IPV: Understanding the CUES Intervention
 Webinar
- Support open communication with parent(s)/guardian(s) for all minors. Staff are encouraged to check in with youth about if and how they might like to include trusted adults in conversations about their reproductive plans. Staff will respect the decisions of a teen whether or not to do so.

Resource(s):

The Society for Adolescent Health and Medicine, 2014. Sexual and Reproductive Health Care: A Position Paper of the Society for Adolescent Health and Medicine: http://www.jahonline.org/article/S1054-139X%2814%2900052-4/fulltext#sec2.6

Advocates for Youth. Parent-Child Communication: Promoting Sexually Healthy Youth: https://www.advocatesforyouth.org/wp-content/uploads/storage//advfy/documents/parent%20child%20communication%202010.pdf

D.4 Referrals and Information Sharing

- ♦ Establish relationships with other providers in the community. Maintain collaborative agreements or memorandums of understanding (MOUs) with frequently used referral partners.
- Maintain an up-to-date list of key mental health, domestic violence, and substance use treatment providers in the community.
- ♦ <u>Utilize 211</u> to identify resources related to housing, transportation, childcare, etc. for clients expressing need.

Resource(s):

Reproductive Health National Training Center, Establishing and Providing Effective Referrals for Clients: A Toolkit for Family Planning Providers: https://rhntc.org/resources/establishing-and-providing-effective-referrals-clients-toolkit-family-planning-providers

OregonHealthCare.gov, Find Local Help: https://healthcare.oregon.gov/Pages/find-help.aspx

Section E: Data Collection and Reporting

E.1 Collection and Submission of Claims Data

- Review the tools and resources related to AbortionCare data collection on the RH Program website: http://www.healthoregon.org/rhbilling, including:
 - AbortionCare Clinic Visit Record (CVR) form
 - AbortionCare CVR Manual (coming soon)
 - AbortionCare CVR submission deadlines
- ♦ Create workflows for clinic staff. This could include:
 - Which staff will complete each portion of the CVR (client information and demographics, clinic services, and billing when applicable)?
 - Who will decide when a CVR is complete and can be submitted?
 - O Who will review and correct CVR errors?

E.2 Other Data and Reporting Requirements

- Distribute requests for information to the appropriate staff upon receipt of the request, flagging the due date.
- Set up calendar reminders to check in with staff regarding requested information.
- Store most recently submitted Agency, Staff, and Clinic Information Form in an easy to find location.
- ◆ Create to-do list specific to AbortionCare, including emailing the RH Program when contact information from the Agency, Staff, and Clinic Information Form changes.

Section F: Reproductive Health Access Fund

F.1 Client Enrollment

- Review the tools and resources related to client enrollment on the RH Program website: <u>healthoregon.org/rhclientenrollment</u>, including:
 - o RH Access Fund Enrollment Form Guide
 - o RH Access Fund Enrollment Form, translated into several languages
 - o Tools to assist clients in completing the RH Access Fund Enrollment Form
 - o <u>Instructions for clinic staff using the RH Access Eligibility Database</u>
- ♦ Allow plenty of time for clients to complete the Enrollment Form before their visit and for clinic staff to review it for completeness. Ask clients to arrive at least 20 minutes before their scheduled visit.
- ◆ Keep hard copies of the various enrollment tools on hand to assist clients in completing the Enrollment Form.

F.2 Billing and Payment

- Review the tools and resources related to billing the RH Access Fund for abortion services on the RH Program website: healthoregon.org/rhbilling, including:
 - AbortionCare Clinic Visit Record (CVR) form
 - AbortionCare CVR submission deadlines
 - o AbortionCare reimbursement rates, including supply reimbursement rates
 - Ambulatory Surgical Centers
 - Outpatient Clinics

- Draft easy-to-read policies and processes for both front desk staff and billing staff to ensure that enrollees are not charged for services covered by the RH Access Fund.
- Develop clear and consistent language for staff to use with enrollees about what they may be charged for services not covered by the RH Access Fund.
- ♦ Identify the insurance plans most used by your clients and ensure that your contracts with these plans include coverage for reproductive health services.
- ◆ Become familiar with <u>Oregon Health Plan (OHP) covered services and billing requirements</u>.