



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Healthcare Inspections

VETERANS HEALTH ADMINISTRATION

Comprehensive Healthcare
Inspection Program Review
of the John J. Pershing VA
Medical Center

Poplar Bluff, Missouri

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Figure 1. John J. Pershing VA Medical Center, Poplar Bluff, Missouri
(Source: <https://vaww.va.gov/directory/guide/>, accessed on July 11, 2018)

Abbreviations

| | |
|------|--|
| CBOC | community based outpatient clinic |
| CHIP | Comprehensive Healthcare Inspection Program |
| CS | controlled substances |
| CSC | controlled substances coordinator |
| CSI | controlled substances inspector |
| EHR | electronic health record |
| EOC | environment of care |
| FPPE | Focused Professional Practice Evaluation |
| GE | geriatric evaluation |
| LIP | licensed independent practitioner |
| MH | mental health |
| OIG | Office of Inspector General |
| OPPE | Ongoing Professional Practice Evaluation |
| PC | primary care |
| PTSD | post-traumatic stress disorder |
| QSV | quality, safety, and value |
| RCA | root cause analysis |
| SAIL | Strategic Analytics for Improvement and Learning |
| TJC | The Joint Commission |
| UM | utilization management |
| VHA | Veterans Health Administration |
| VISN | Veterans Integrated Service Network |



Report Overview

This Comprehensive Healthcare Inspection Program (CHIP) review provides a focused evaluation of the quality of care delivered in the inpatient and outpatient settings of the John J. Pershing VA Medical Center (Facility). The review covers key clinical and administrative processes that are associated with promoting quality care.

CHIP reviews are one element of the overall efforts of the Office of Inspector General (OIG) to ensure that our nation's veterans receive high-quality and timely VA healthcare services. The reviews are performed approximately every three years for each facility. The OIG selects and evaluates specific areas of focus on a rotating basis each year.

The OIG's current areas of focus are

1. Leadership and Organizational Risks;
2. Quality, Safety, and Value;
3. Credentialing and Privileging;
4. Environment of Care;
5. Medication Management;
6. Mental Health Care;
7. Long-Term Care;
8. Women's Health; and
9. High-Risk Processes.¹

This review was conducted during an unannounced visit made during the week of April 23, 2018. The OIG conducted interviews and reviewed clinical and administrative processes related to areas of focus that affect patient care outcomes. Although the OIG reviewed a spectrum of clinical and administrative processes, the sheer complexity of VA medical centers limits the ability to assess all areas of clinical risk. The findings presented in this report are a snapshot of Facility performance within the identified focus areas at the time of the OIG visit. Although it is difficult to quantify the risk of patient harm, the findings in this report may help facilities identify areas of vulnerability or conditions that, if properly addressed, could improve patient safety and healthcare quality.

¹ The OIG's review of central line-associated bloodstream infections focused on those that developed during care in intensive care units. This review was not performed for the John J. Pershing VA Medical Center because the Facility did not have an intensive care unit.

Results and Review Impact

Leadership and Organizational Risks

At the Facility, the leadership team consists of the Director, Acting Chief of Staff, Associate Director for Patient Care Services (ADPCS), and Associate Director. Organizational communication and accountability are carried out through a committee reporting structure, with the Executive Leadership Board having oversight for groups such as the Executive Committee of the Medical Staff; Nursing Executive Council; Quality, Safety & Value Council; and Operations Council. The leaders are members of the Executive Leadership Board and the Quality, Safety & Value Council through which they track, trend, and monitor quality of care and patient outcomes.

The Director, assigned in January 2016, was the most tenured executive leadership team member. The Chief of Staff position was vacant at the time of this review, and the ADPCS and Associate Director were assigned to their positions in March and September 2017, respectively.

In the review of selected employee satisfaction survey results regarding Facility leaders, the OIG noted opportunities to improve clinical employee satisfaction. Similarly, in the review of selected patient experience survey results regarding Facility leaders, the OIG noted opportunities for improvement in both the inpatient and outpatient settings. Facility leaders appeared actively engaged with employees and patients and had implemented several actions designed to improve satisfaction and promote positive patient experiences.

The OIG recognizes that the Strategic Analytics for Improvement and Learning (SAIL) model has limitations for identifying all areas of clinical risk but is “a way to understand the similarities and differences between the top and bottom performers” within VHA.² Although the leadership team was knowledgeable about selected SAIL metrics, the leaders should continue to take actions to improve and maintain performance of the Quality of Care and Efficiency metrics likely contributing to the current “4-Star” rating.

² VHA’s Office of Operational Analytics and Reporting developed a model for understanding a facility’s performance in relation to nine quality domains and one efficiency domain. The domains within SAIL are made up of multiple composite measures, and the resulting scores permit comparison of facilities within a Veterans Integrated Service Network or across VHA. The SAIL model uses a “star” rating system to designate a facility’s performance in individual measures, domains, and overall quality.
<http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=2146>.
(Website accessed on April 16, 2017.)

Additionally, the OIG reviewed accreditation agency findings, sentinel events,³ disclosures of adverse patient events, and Patient Safety Indicator data and did not identify any substantial organizational risk factors.

The OIG noted findings in one of the seven areas of clinical operations reviewed and issued two recommendations that are attributable to the Associate Director. These are briefly described below.

Environment of Care

The OIG noted general compliance with many of the requirements evaluated at the parent Facility, including environment of care rounds, general safety, and privacy measures. The representative community based outpatient clinic generally met the performance indicators evaluated. However, the OIG identified deficiencies with environmental cleanliness and management of the emergency power supply system at the parent Facility.

Summary

In the review of key care processes, the OIG issued two recommendations that are attributable to the Associate Director. The number of recommendations should not be used as a gauge for the overall quality provided at this Facility. The intent is for Facility leaders to use these recommendations as a road map to help improve operations and clinical care. The recommendations address systems issues as well as other less-critical findings that, if left unattended, may eventually interfere with the delivery of quality health care.

Comments

The Veterans Integrated Service Network Director and Facility Director agreed with the CHIP review findings and recommendations and provided acceptable improvement plans. (See Appendixes E and F, pages 48–49, and the responses within the body of the report for the full text of the Directors’ comments.) We will follow up on the planned actions until they are completed.



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³ A sentinel event is an incident or condition that results in patient death, permanent harm, severe temporary harm, or intervention required to sustain life.

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Purpose and Scope

Purpose

This Comprehensive Healthcare Inspection Program (CHIP) review was conducted to provide a focused evaluation of the quality of care delivered in the inpatient and outpatient settings of the John J. Pershing VA Medical Center (Facility) through a broad overview of key clinical and administrative processes that are associated with quality care and positive patient outcomes. The purpose of the review was to provide oversight of healthcare services to veterans and to share findings with Facility leaders so that informed decisions can be made to improve care.

Scope

Good leadership makes a difference in managing organizational risks by establishing goals, strategies, and priorities to improve care; setting the quality agenda; and promoting a quality improvement culture to sustain positive change.^{4,5} Investment in a culture of safety and quality improvement with robust communication and leadership is more likely to result in positive patient outcomes in healthcare organizations.⁶ Figure 2 shows the direct relationship leadership and organizational risks have with the processes used to deliver care to veterans.

To examine risks to patients and the organization when these processes are not performed well, the OIG focused on the following nine areas of clinical care and administrative operations that support quality care—Leadership and Organizational Risks; Quality, Safety, and Value (QSV); Credentialing and Privileging; Environment of Care (EOC); Medication Management; Controlled Substances (CS) Inspection Program; Mental Health: Post-Traumatic Stress Disorder (PTSD) Care; Long-Term Care: Geriatric Evaluations; Women’s Health: Mammography Results and Follow-up; and High-Risk Processes: Central Line-Associated Bloodstream Infections (CLABSI) (see Figure 2).⁷ However, the CLABSI review did not apply because the Facility did not have an intensive care unit. Thus, the OIG focused on the remaining eight areas.

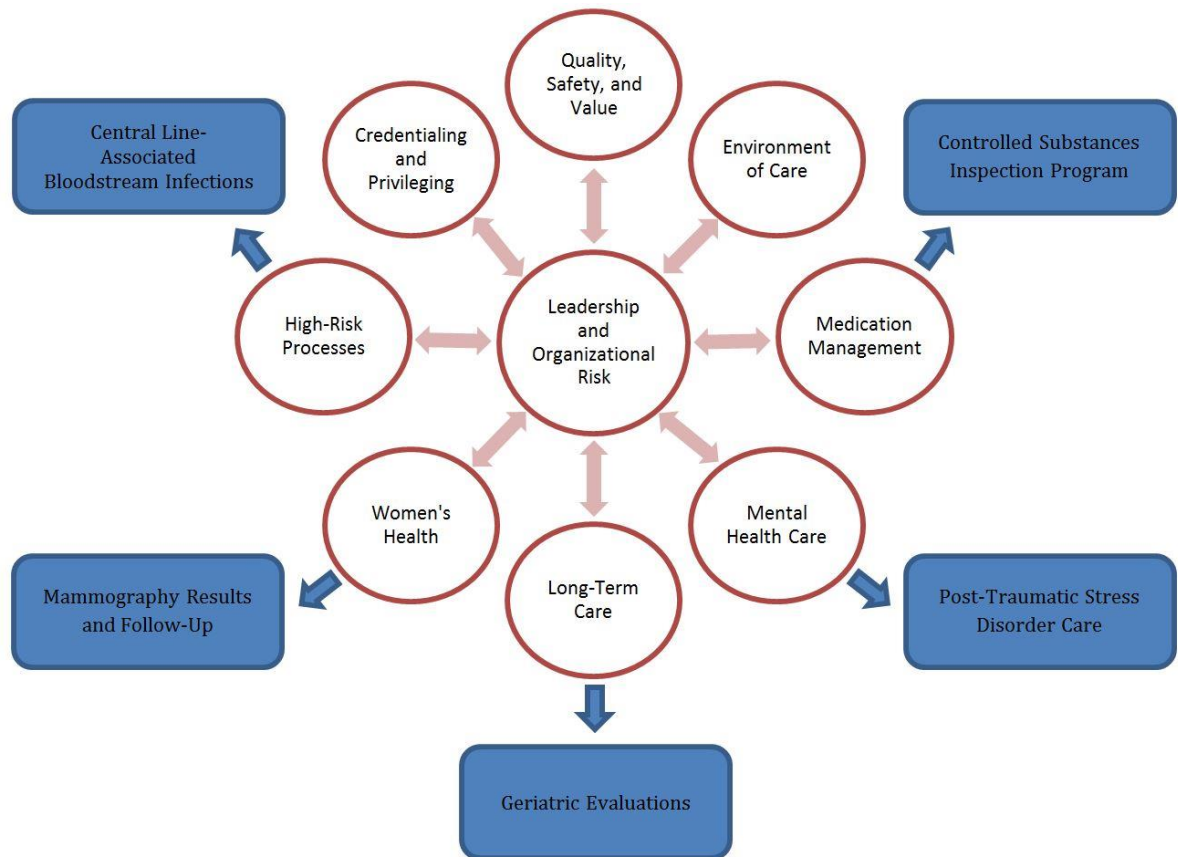
⁴ Carol Stephenson, “The role of leadership in managing risk,” *Ivey Business Journal*, November/December 2010. <https://iveybusinessjournal.com/publication/the-role-of-leadership-in-managing-risk/>. (Website accessed on March 1, 2018.)

⁵ Anam Parand, Sue Dopson, Anna Renz, and Charles Vincent, “The role of hospital managers in quality and patient safety: a systematic review,” *British Medical Journal*, 4, no. 9 (September 5, 2014): e005055. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4158193/>. (Website accessed on March 1, 2018.)

⁶ Institute for Healthcare Improvement, “How risk management and patient safety intersect: Strategies to help make it happen,” March 24, 2015. <http://www.npsf.org/blogpost/1158873/211982/How-Risk-Management-and-Patient-Safety-Intersect-Strategies-to-Help-Make-It-Happen>. (Website accessed on March 1, 2018.)

⁷ CHIP reviews address these processes during fiscal year (FY) 2018 (October 1, 2017, through September 30, 2018).

**Figure 2. FY 2018 Comprehensive Healthcare Inspection Program
Review of Healthcare Operations and Services**



Source: VA OIG

Methodology

To determine compliance with the Veterans Health Administration (VHA) requirements related to patient care quality, clinical functions, and the EOC, the OIG physically inspected selected areas; reviewed clinical records, administrative and performance measure data, and accreditation survey reports;⁸ and discussed processes and validated findings with managers and employees. The OIG interviewed applicable managers and members of the executive leadership team.

The review covered operations for September 14, 2015,⁹ through April 23, 2018, the date when an unannounced week-long site visit commenced.

This report's recommendations for improvement target problems that can impact the quality of patient care significantly enough to warrant OIG follow-up until the Facility completes corrective actions. The Director's comments submitted in response to the recommendations in this report appear within each topic area.

While on site, the OIG did not receive any complaints beyond the scope of the CHIP review. The OIG conducted the inspection in accordance with OIG standard operating procedures for CHIP reviews and Quality Standards for Inspection and Evaluation published by the Council of the Inspectors General on Integrity and Efficiency.

⁸ The OIG did not review VHA's internal survey results but focused on OIG inspections and external surveys that affect Facility accreditation status.

⁹ This is the date of the last Combined Assessment Program and/or Community Based Outpatient Clinic and Other Outpatient Clinic reviews.

Results and Recommendations

Leadership and Organizational Risks

Stable and effective leadership is critical to improving care and sustaining meaningful change. Leadership and organizational risks can impact the Facility's ability to provide care in all of the selected clinical areas of focus.¹⁰ To assess the Facility's risks, the OIG considered the following organizational elements:

1. Executive leadership stability and engagement,
2. Employee satisfaction and patient experience,
3. Accreditation/for-cause surveys and oversight inspections,
4. Indicators for possible lapses in care, and
5. VHA performance data.

Executive Leadership Stability and Engagement

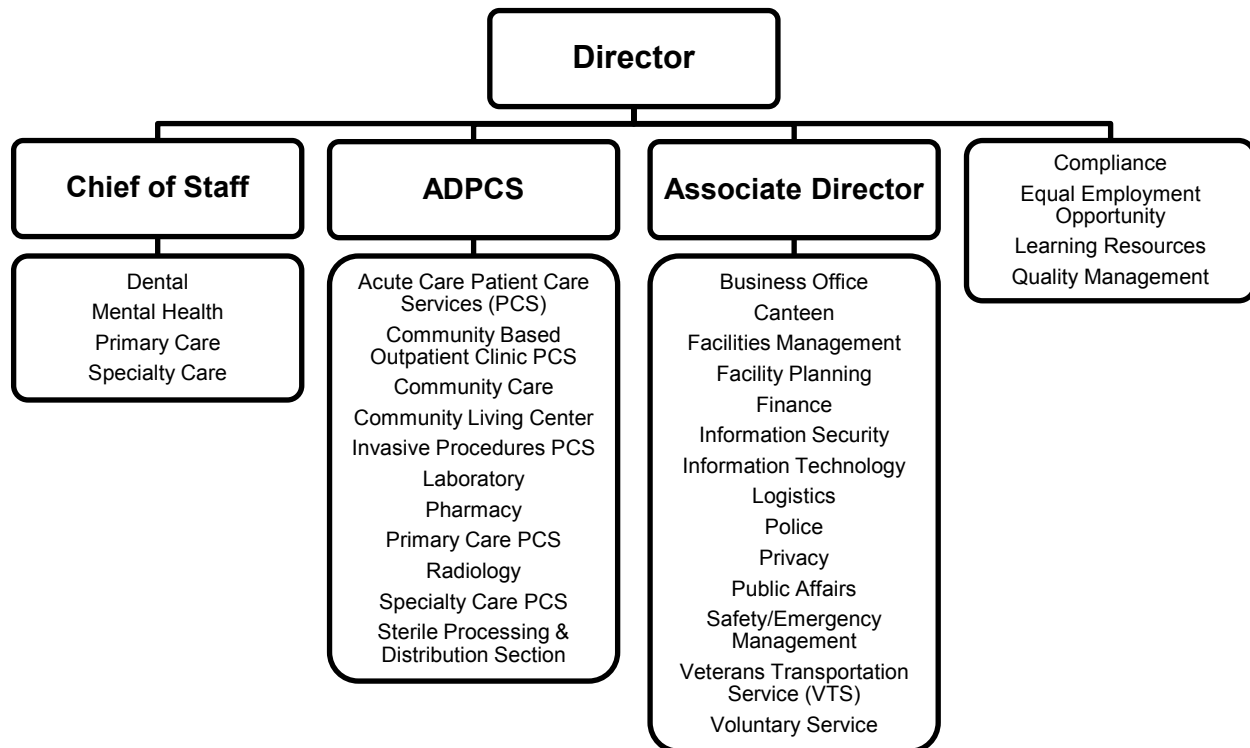
Because each VA facility organizes its leadership to address the needs and expectations of the local veteran population that it serves, organizational charts may differ among facilities. Figure 3 illustrates the Facility's reported organizational structure. The Facility has a leadership team consisting of the Director, Acting Chief of Staff, Associate Director for Patient Care Services (ADPCS), and Associate Director. The Acting Chief of Staff and ADPCS are responsible for overseeing patient care and service directors.

The Director, assigned in January 2016, was the most tenured executive leadership team member. The Director described a high level of personal and professional commitment to and engagement with the community and stakeholders who reportedly provide broad-level VA and veteran support. At the time of this review, the Chief of Staff position had been vacant for four months, with coverage rotating between two Facility physicians who concurrently remained responsible for their full-time positions. In the absence of a permanent Chief of Staff, the ADPCS, assigned in March 2017, was responsible for many of the clinical care challenges. The Associate Director, assigned in September 2017, was the only executive leadership team member hired from within the Facility and had previously served in several key administrative positions. The Director stated

¹⁰ L. Botwinick, M. Bisognano, and C. Haraden, "Leadership Guide to Patient Safety," *Institute for Healthcare Improvement*, Innovation Series White Paper. 2006.
<http://www.ihl.org/resources/Pages/IHIWhitePapers/LeadershipGuidetoPatientSafetyWhitePaper.aspx>. (Website accessed on February 2, 2017.)

that the combination of new and existing leaders provided the executive team with a historical perspective and an opportunity to bring forward new ideas and practices.

Figure 3. Facility Organizational Chart



Source: John J. Pershing VA Medical Center (received April 23, 2018)

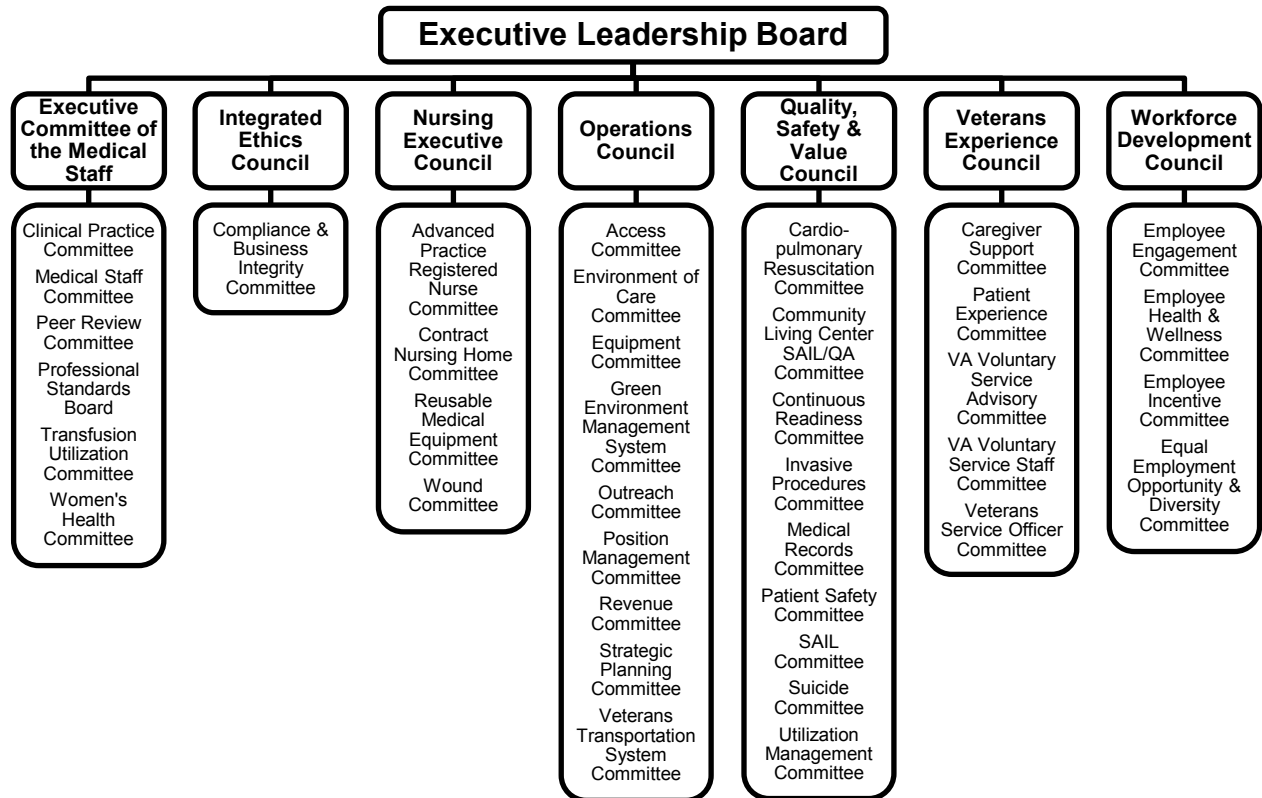
To help assess engagement of Facility executive leadership, the OIG interviewed the Director, Acting Chief of Staff, ADPCS, and Associate Director regarding their knowledge of various performance metrics and their involvement and support of actions to improve or sustain performance.

In individual interviews, these executive leadership team members spoke knowledgeably, within the scope of their responsibilities, about actions taken during the previous 12 months to maintain or improve performance, employee and patient survey results, and selected Strategic Analytics for Improvement and Learning (SAIL) metrics. These are discussed more fully below.

The leaders are also engaged in monitoring patient safety and care through formal mechanisms. Organizational communication and accountability is carried out through a committee reporting structure with the Executive Leadership Board having oversight for leadership committees such as the Executive Committee of the Medical Staff; Nursing Executive Council; Quality, Safety & Value Council; and Operations Council. The Director serves as the chairperson of the Executive Leadership Board with the authority and responsibility to establish policy, maintain quality care standards, and perform organizational management and strategic planning. The Quality, Safety &

Value Council, also chaired by the Director is responsible for tracking, trending, and monitoring quality of care and patient outcomes. The executive leaders are members of the Executive Leadership Board and the Quality, Safety & Value Council. See Figure 4.

Figure 4. Facility Committee Reporting Structure



Source: John J. Pershing VA Medical Center (received April 23, 2018)

Employee Satisfaction and Patient Experience

The All Employee Survey is an annual, voluntary, census survey of VA workforce experiences. The data are anonymous and confidential. Since 2001, the instrument has been refined at several points in response to VA leadership inquiries on VA culture and organizational health. Although the OIG recognizes that employee satisfaction survey data are subjective, they can be a starting point for discussions, indicate areas for further inquiry, and be considered along with other information on Facility leadership.

To assess employee and patient attitudes toward Facility leaders, the OIG reviewed employee satisfaction and patient experience survey results that relate to the period of October 1, 2016,

through September 30, 2017. Tables 1–3 provide relevant survey results for VHA, the Facility, and clinical and non-clinical services.¹¹

Table 1 summarizes employee attitudes toward selected Facility leaders as expressed in VHA’s All Employee Survey.¹² Although the Servant Leader Index Composite score for the Facility was lower than the VHA average, the overall satisfaction expressed by employees with executive leaders was similar to the VHA average.¹³ However, the OIG noted distinct differences when comparing non-clinical and clinical employee scores. Non-clinical employee attitudes reflected higher satisfaction, while clinical employee attitudes reflected lower satisfaction compared to both the Facility and VHA averages.

**Table 1. Survey Results on Employee Attitudes toward Facility Leadership
(October 1, 2016, through September 30, 2017)**

| Questions/ Survey Items | Scoring | VHA Average | Facility Average | Clinical Services Average | Non- Clinical Services Average |
|--|--|----------------|---------------------|---------------------------------|---|
| All Employee Survey: <i>Servant Leader Index Composite</i> | 0–100 where HIGHER scores are more favorable | 67.7 | 65.8 | 64.0 | 68.7 |
| All Employee Survey Q59. <i>How satisfied are you with the job being done by the executive leadership where you work?</i> | 1 (Very Dissatisfied)–5 (Very Satisfied) | 3.3 | 3.3 | 3.2 | 3.5 |

Source: VA All Employee Survey (accessed March 23, 2018)

Table 2 summarizes employee attitudes toward the workplace as expressed in VHA’s All Employee Survey. The Facility averages for the selected survey questions were generally similar to or lower than the VHA average. The OIG again noted distinct differences when comparing

¹¹ Data applicable to each executive leader was not available due to the workgroup structure used by the Facility. However, aggregated data for clinical and non-clinical services was available for presentation and on-site discussions with executive leaders.

¹² The All Employee Survey is an annual, voluntary, census survey of VA workforce experiences. The data are anonymous and confidential. The instrument has been refined at several points since 2001 in response to operational inquiries by VA leadership on organizational health relationships and VA culture.

¹³ The OIG makes no comment on the adequacy of the VHA average for each selected survey element. The VHA average is used for comparison purposes only.

clinical and non-clinical employee averages. Clinical employee attitudes reflected lower satisfaction with the workplace while non-clinical employee attitudes reflected higher satisfaction with the workplace when compared to both the Facility and VHA averages.

Opportunities appear to exist to improve clinical employee satisfaction with executive leaders and to provide a workplace environment where the employees feel safe to bring forth issues or ethical concerns. Facility leaders attributed lower clinical employee scores to the prior parochial clinical leadership style and multiple ADPCS rotations which created a culture where clinical employees were not involved in decision-making or encouraged to bring concerns forward. Facility leaders reported introducing proactive VA programs designed to improve employee satisfaction while promoting engagement and ownership.

**Table 2. Survey Results on Employee Attitudes toward Workplace
(October 1, 2016, through September 30, 2017)**

| Questions/ Survey Items | Scoring | VHA Average | Facility Average | Clinical Services Average | Non-Clinical Services Average |
|---|--|-------------|------------------|---------------------------|-------------------------------|
| All Employee Survey Q43. <i>My supervisor encourages people to speak up when they disagree with a decision.</i> | 1 (Strongly Disagree)– 5 (Strongly Agree) | 3.8 | 3.6 | 3.5 | 3.9 |
| All Employee Survey Q44. <i>I feel comfortable talking to my supervisor about work-related problems even if I'm partially responsible.</i> | 1 (Strongly Disagree)– 5 (Strongly Agree) | 3.9 | 3.9 | 3.8 | 4.0 |
| All Employee Survey Q75. <i>I can talk with my direct supervisor about ethical concerns without fear of having my comments held against me.</i> | 1 (Strongly Disagree)– 5 (Strongly Agree) | 3.9 | 3.8 | 3.7 | 4.0 |

Source: VA All Employee Survey (accessed March 23, 2018)

VHA's Patient Experiences Survey Reports provide results from the Survey of Healthcare Experience of Patients (SHEP) program. VHA utilizes industry standard surveys from the Consumer Assessment of Healthcare Providers and Systems program to evaluate patients' experiences of their health care and to support the goal of benchmarking its performance against the private sector.

VHA collects SHEP survey data from Patient-Centered Medical Home, Specialty Care, and Inpatient Surveys. From these, the OIG selected four survey items that reflect patient attitudes towards facility leaders (see Table 3). For this Facility, three of the four patient survey results reflected lower care ratings compared to the VHA average.

Opportunities appear to exist to improve both inpatient and outpatient satisfaction with care provided. Facility leaders reported that they had identified opportunities to improve the patient experience and were in the process of implementing targeted initiatives to increase patient satisfaction.

**Table 3. Survey Results on Patient Attitudes toward Facility Leadership
(October 1, 2016, through September 30, 2017)**

| Questions | Scoring | VHA Average | Facility Average |
|--|--|-------------|------------------|
| Survey of Healthcare Experiences of Patients (inpatient): <i>Would you recommend this hospital to your friends and family?</i> | The response average is the percent of "Definitely Yes" responses. | 66.7 | 65.6 |
| Survey of Healthcare Experiences of Patients (inpatient): <i>I felt like a valued customer.</i> | The response average is the percent of "Agree" and "Strongly Agree" responses. | 83.4 | 81.5 |
| Survey of Healthcare Experiences of Patients (outpatient Patient-Centered Medical Home): <i>I felt like a valued customer.</i> | The response average is the percent of "Agree" and "Strongly Agree" responses. | 74.9 | 75.1 |
| Survey of Healthcare Experiences of Patients (outpatient specialty care): <i>I felt like a valued customer.</i> | The response average is the percent of "Agree" and "Strongly Agree" responses. | 75.2 | 72.8 |

Source: VHA Office of Reporting, Analytics, Performance, Improvement and Deployment (accessed December 22, 2017)

Accreditation/For-Cause Surveys¹⁴ and Oversight Inspections

To further assess Leadership and Organizational Risks, the OIG reviewed recommendations from previous inspections by oversight and accrediting agencies to gauge how well leaders respond to identified problems. Table 4 summarizes the relevant Facility inspections most recently performed by the OIG and The Joint Commission (TJC).¹⁵ Indicative of effective leadership, the Facility has closed all recommendations for improvement as listed in Table 4.¹⁶

The OIG also noted the Facility's current accreditation status with the Commission on Accreditation of Rehabilitation Facilities¹⁷ and College of American Pathologists,¹⁸ which demonstrates the Facility leaders' commitment to quality care and services. Additionally, the Long Term Care Institute conducted an inspection of the Facility's Community Living Center.¹⁹

Table 4. Office of Inspector General Inspections/Joint Commission Survey

| Accreditation or Inspecting Agency | Date of Visit | Number of Findings | Number of Recommendations Remaining Open |
|--|----------------|--------------------|--|
| OIG (<i>Combined Assessment Program Review of the John J. Pershing VA Medical Center, Poplar Bluff, Missouri, November 10, 2015</i>) | September 2015 | 16 | 0 |
| OIG (<i>Review of Community Based Outpatient Clinics and Other Outpatient Clinics John J. Pershing VA Medical Center,</i> | September 2015 | 10 | 0 |

¹⁴ The Joint Commission (TJC) conducts for-cause unannounced surveys in response to serious incidents relating to the health and/or safety of patients or staff or reported complaints. The outcomes of these types of activities may affect the current accreditation status of an organization.

¹⁵ TJC is an internationally accepted external validation that an organization has systems and processes in place to provide safe and quality oriented health care. TJC has been accrediting VHA facilities for more than 30 years. Compliance with TJC standards facilitates risk reduction and performance improvement.

¹⁶ A closed status indicates that the Facility has implemented corrective actions and improvements to address findings and recommendations, not by self-certification, but as determined by the accreditation organization or inspecting agency.

¹⁷ The Commission on Accreditation of Rehabilitation Facilities provides an international, independent, peer review system of accreditation that is widely recognized by Federal agencies. VHA's commitment is supported through a system-wide, long-term joint collaboration with the Commission on Accreditation of Rehabilitation Facilities to achieve and maintain national accreditation for all appropriate VHA rehabilitation programs.

¹⁸ For 70 years, the College of American Pathologists has fostered excellence in laboratories and advanced the practice of pathology and laboratory science. In accordance with VHA Handbook 1106.01, VHA laboratories must meet the requirements of the College of American Pathologists.

¹⁹ Since 1999, the Long Term Care Institute has been to over 3,500 healthcare facilities conducting quality reviews and external regulatory surveys. The Long Term Care Institute is a leading organization focused on long-term care quality and performance improvement; compliance program development; and review in long-term care, hospice, and other residential care settings.

| Accreditation or Inspecting Agency | Date of Visit | Number of Findings | Number of Recommendations Remaining Open |
|---|---------------|--------------------|--|
| <i>Poplar Bluff, Missouri, November 23, 2015)</i> | | | |
| OIG (<i>Healthcare Inspection – Opioid Management Practice Concerns, John J. Pershing VA Medical Center, Poplar Bluff, Missouri, June 1, 2017)</i> | January 2016 | 8 | 0 |
| TJC | June 2016 | | |
| • Hospital Accreditation | | 15 | 0 |
| • Nursing Care Center Accreditation | | 3 | 0 |
| • Behavioral Health Care Accreditation | | 0 | n/a |
| • Home Care Accreditation | | 2 | 0 |

Sources: OIG and TJC (Inspection/survey results verified with the Director on April 25, 2018)

Indicators for Possible Lapses in Care

Within the healthcare field, the primary organizational risk is the potential for patient harm. Many factors impact the risk for patient harm within a system, including unsafe environmental conditions, sterile processing deficiencies, and infection control practices. Leaders must be able to understand and implement plans to minimize patient risk through consistent and reliable data and reporting mechanisms. Table 5 summarizes key indicators of risk since the OIG's previous September 2015 Combined Assessment Program and Community Based Outpatient Clinic (CBOC) and Other Outpatient Clinics review inspections through the week of April 23, 2018.²⁰

²⁰ It is difficult to quantify an acceptable number of occurrences because one occurrence is one too many. Efforts should focus on prevention. Sentinel events and those that lead to disclosure can occur in either inpatient or outpatient settings and should be viewed within the context of the complexity of the Facility. (Note that the John J. Pershing VA Medical Center is a low complexity (3) Facility as described in Appendix B.)

**Table 5. Summary of Selected Organizational Risk Factors
(September 2015 to April 23, 2018)**

| Factor | Number of Occurrences |
|---|-----------------------|
| Sentinel Events ²¹ | 0 |
| Institutional Disclosures ²² | 2 |
| Large-Scale Disclosures ²³ | 0 |

Source: John J. Pershing VA Medical Center's Accreditation Specialist and Performance Improvement Officer (received April 24, 2018)

The OIG also reviewed Patient Safety Indicators developed by the Agency for Healthcare Research and Quality within the U.S. Department of Health and Human Services. These provide information on potential in-hospital complications and adverse events following surgeries and procedures.²⁴ The rates presented are specifically applicable for this Facility, and lower rates indicate lower risks. Table 6 summarizes Patient Safety Indicator data from October 1, 2015, through September 30, 2017.

**Table 6. Patient Safety Indicator Data
(October 1, 2015, through September 30, 2017)**

| Measure | Reported Rate per 1,000 Hospital Discharges | | |
|---|---|---------|----------|
| | VHA | VISN 15 | Facility |
| Pressure ulcers | 0.60 | 0.48 | 0.00 |
| Death among surgical inpatients with serious treatable conditions | 100.97 | 106.60 | n/a |
| Iatrogenic pneumothorax | 0.19 | 0.05 | 0.00 |
| Central venous catheter-related bloodstream infection | 0.15 | 0.04 | 0.00 |
| In-hospital fall with hip fracture | 0.08 | 0.18 | 0.00 |

²¹ A sentinel event is an incident or condition that results in patient death, permanent harm, severe temporary harm, or intervention required to sustain life.

²² Institutional disclosure of adverse events (sometimes referred to as “administrative disclosure”) is a formal process by which facility leaders together with clinicians and others, as appropriate, inform the patient or his or her personal representative that an adverse event has occurred during care that resulted in, or is reasonably expected to result in, death or serious injury, and provide specific information about the patient’s rights and recourse.

²³ Large-scale disclosure of adverse events (sometimes referred to as “notification”) is a formal process by which VHA officials assist with coordinating the notification to multiple patients (or their personal representatives) that they may have been affected by an adverse event resulting from a systems issue.

²⁴ Agency for Healthcare Research and Quality. <https://www.qualityindicators.ahrq.gov/>. (Website accessed on March 8, 2017.)

| Measure | Reported Rate per 1,000 Hospital Discharges | | |
|--|---|---------|----------|
| | VHA | VISN 15 | Facility |
| Perioperative hemorrhage or hematoma | 1.94 | 0.58 | n/a |
| Postoperative acute kidney injury requiring dialysis | 0.88 | 1.50 | n/a |
| Postoperative respiratory failure | 5.55 | 7.46 | n/a |
| Perioperative pulmonary embolism or deep vein thrombosis | 3.29 | 1.76 | n/a |
| Postoperative sepsis | 4.00 | 5.64 | n/a |
| Postoperative wound dehiscence | 0.52 | 0.00 | 0.00 |
| Unrecognized abdominopelvic accidental puncture/laceration | 0.53 | 0.49 | 0.00 |

Source: VHA Support Service Center

Note: The OIG did not assess VA's data for accuracy or completeness.

n/a = not applicable

None of the six applicable Patient Safety Indicator measures show an observed rate per 1,000 hospital discharges in excess of the observed rates for VHA or VISN 15.

Veterans Health Administration Performance Data

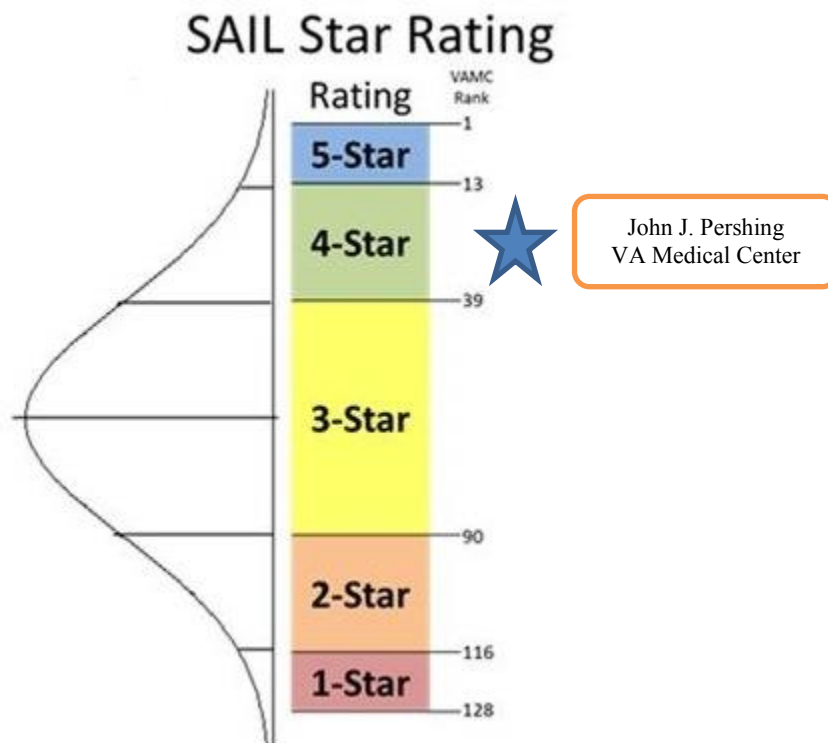
The VA Office of Operational Analytics and Reporting adapted the SAIL Value Model to help define performance expectations within VA. This model includes measures on healthcare quality, employee satisfaction, access to care, and efficiency but has noted limitations for identifying all areas of clinical risk. The data are presented as one “way to understand the similarities and differences between the top and bottom performers” within VHA.²⁵

VA also uses a star-rating system where facilities with a “5-Star” rating are performing within the top 10 percent of facilities and “1-Star” facilities are performing within the bottom 10 percent of facilities. Figure 5 describes the distribution of facilities by star rating.²⁶ As of June 30, 2017, the Facility was rated at “4-Star” for overall quality.

²⁵ VHA Support Service Center (VSSC), The Strategic Analytics for Improvement and Learning (SAIL) Value Model, <http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=2146>. (Website accessed on April 16, 2017.)

²⁶ Based on normal distribution ranking quality domain of 128 VA Medical Centers.

Figure 5. Strategic Analytics for Improvement and Learning Star Rating Distribution (as of June 30, 2017)

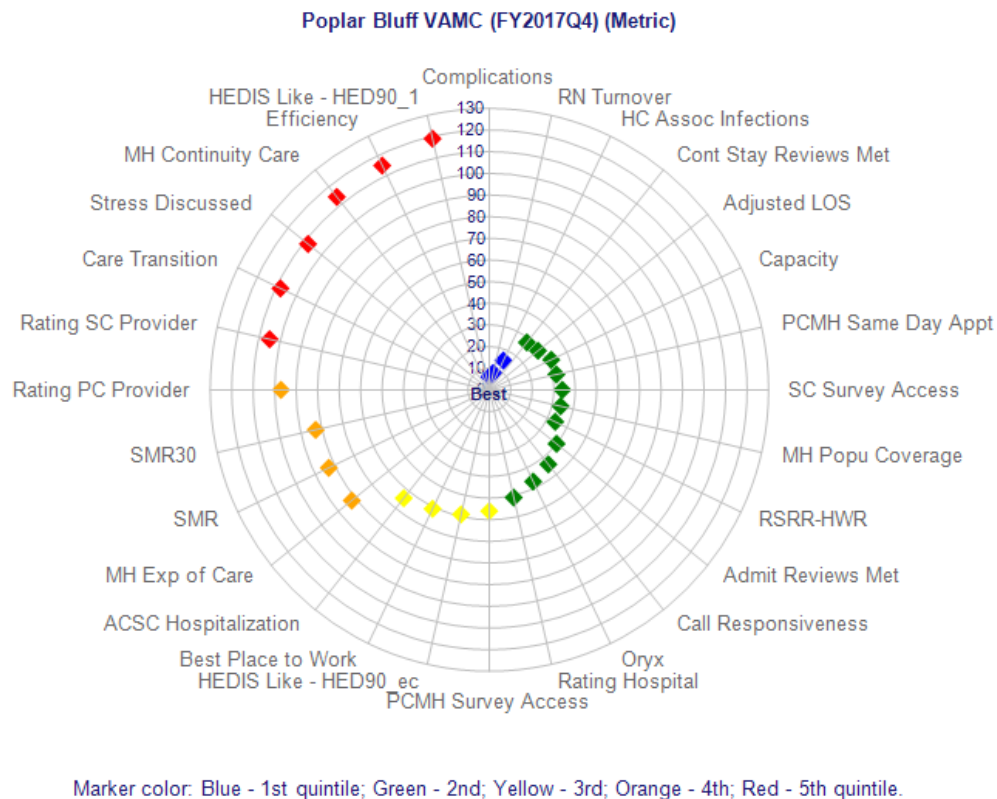


Source: VA Office of Informatics and Analytics Office of Operational Analytics and Reporting (accessed March 23, 2018)

Figure 6 illustrates the Facility's Quality of Care and Efficiency metric rankings and performance compared with other VA facilities as of September 30, 2017. Of note, Figure 6 uses blue and green data points to indicate high performance (for example in the areas of Complications, Registered Nurse (RN) Turnover, Capacity, and Call Responsiveness).²⁷ Metrics that need improvement are denoted in orange and red (for example, Acute Care in-Hospital Standardized Mortality Ratio (SMR), Care Transition, and Mental Health (MH) Continuity (of Care)).

²⁷ For data definitions of acronyms in the SAIL metrics, please see Appendix D.

**Figure 6. Facility Quality of Care and Efficiency Metric Rankings
(as of September 30, 2017)**



Source: VHA Support Service Center

Note: The OIG did not assess VA's data for accuracy or completeness. Also see Appendix C for sample outpatient performance measures that feed into these data points (such as wait times, discharge contacts, and where patient care is received). For data definitions, see Appendix D.

Conclusion

The Director, assigned in January 2016, was the most tenured executive leadership team member. The Chief of Staff position was vacant at the time of this review, and the ADPCS and Associate Director were assigned to their positions in March and September 2017, respectively. Despite the leadership team being relatively new, the OIG noted that Facility leaders were actively engaged with employees and patients and had implemented targeted initiatives to improve satisfaction scores. Organizational leaders supported efforts related to patient safety, quality care, and other positive outcomes (such as initiating processes and plans to maintain positive perceptions of the Facility through active stakeholder and community engagement). The OIG's review of accreditation organization findings, sentinel events, disclosures, Patient Safety Indicator data, and SAIL results did not identify any substantial organizational risk factors. The leadership team was knowledgeable about selected SAIL metrics within their scope of

responsibility and should continue to take actions to sustain and improve performance of Quality of Care and Efficiency metrics contributing to the current “4-Star” rating.

Quality, Safety, and Value

VHA's goal is to serve as the nation's leader in delivering high-quality, safe, reliable, and veteran-centered care using a coordinated care continuum. To meet this goal, VHA must foster a culture of integrity and accountability that is vigilant and mindful, proactively risk aware, and predictable, while seeking continuous improvement.²⁸ VHA also strives to provide healthcare services that compare favorably to the best of the private sector in measured outcomes, value, and efficiency.²⁹

VHA requires that its facilities operate a Quality, Safety, and Value program to monitor the quality of patient care and performance improvement activities. The purpose of the OIG review was to determine whether the Facility implemented and incorporated selected key functions of VHA's Enterprise Framework for QSV into local activities. To assess this area of focus, the OIG evaluated the following: protected peer reviews of clinical care,³⁰ utilization management (UM) reviews,³¹ and patient safety incident reporting with related root cause analyses (RCAs).³²

VHA has implemented approaches to improving patient safety, including the reporting of patient safety incidents to its National Center of Patient Safety. Incident reporting helps VHA learn about system vulnerabilities and how to address them. Required RCAs help to more accurately identify and rapidly communicate potential and actual causes of harm to patients throughout the organization.³³

²⁸ VHA Directive 1026; *VHA Enterprise Framework for Quality, Safety, and Value*, August 2, 2013.

²⁹ Department of Veterans Affairs, *Veterans Health Administration Blueprint for Excellence*, September 2014.

³⁰ According to VHA Directive 2010-025 (June 3, 2010), this is a peer evaluation of the care provided by individual providers within a selected episode of care. This also involves a determination of the necessity of specific actions, and confidential communication is given to the providers who were peer reviewed regarding the results and any recommended actions to improve performance. The process may also result in identification of systems and process issues that require special consideration, investigation, and possibly administrative action by facility staff. (Due for recertification June 30, 2015, but has not been updated.)

³¹ According to VHA Directive 1117, UM reviews evaluate the appropriateness, medical need, and efficiency of healthcare services according to evidence-based criteria.

³² According to VHA Handbook 1050.01, *VHA National Patient Safety Improvement Handbook*, March 4, 2011, VHA has implemented approaches to improve patient safety, including the reporting of patient safety incidents to the VHA National Center for Patient Safety, in order for VHA to learn about system vulnerabilities and how to address them as well as the requirement to implement RCA (a widely-used methodology for dealing with safety-related issues) to allow for more accurate and rapid communication throughout an organization of potential and actual causes of harm to patients.

³³ VHA Handbook 1050.01.

The OIG interviewed senior managers and key QSV employees and evaluated meeting minutes, protected peer reviews, RCAs, the annual patient safety report, and other relevant documents. Specifically, OIG inspectors evaluated the following performance indicators:³⁴

- Protected peer reviews
 - Examination of important aspects of care (for example, appropriate and timely ordering of diagnostic tests, prompt treatment, and appropriate documentation)
 - Implementation of improvement actions recommended by the Peer Review Committee
- UM
 - Completion of at least 75 percent of all required inpatient reviews
 - Documentation of at least 75 percent of Physician UM Advisors' decisions in National UM Integration database
 - Interdisciplinary review of UM data
- Patient safety
 - Entry of all reported patient incidents into VHA's patient safety reporting system³⁵
 - Annual completion of a minimum of eight RCAs³⁶
 - Provision of feedback about RCA actions to reporting employees
 - Submission of annual patient safety report

Conclusion

Generally, the Facility met requirements with the above performance indicators. The OIG made no recommendations.

³⁴ For CHIP reviews, the OIG selects performance indicators based on VHA or regulatory requirements or accreditation standards and evaluates these for compliance.

³⁵ WebSPOT has been the software application used for reporting and documenting adverse events in the VHA (National Center for Patient Safety) Patient Safety Information System database. However, it is expected that by April 1, 2018, all facilities will have implemented the new Joint Patient Safety Reporting System (JPSR); and it is anticipated that all previous patient safety event reporting systems will be discontinued by July 1, 2018.

³⁶ According to VHA Handbook 1050.01, March 4, 2011, the requirement for a total of eight RCAs and aggregated reviews is a minimum number, as the total number of RCAs is driven by the events that occur and the Safety Assessment Code (SAC) score assigned to them. At least four analyses per fiscal year must be individual RCAs, with the balance being aggregated reviews or additional individual RCAs.

Credentialing and Privileging

VHA has defined procedures for the credentialing and privileging of all healthcare professionals who are permitted by law and the facility to practice independently—without supervision or direction, within the scope of the individual’s license, and in accordance with individually granted clinical privileges. These healthcare professionals are also referred to as licensed independent practitioners (LIP).³⁷

Credentialing refers to the systematic process of screening and evaluating qualifications. Credentialing involves ensuring an applicant has the required education, training, experience, and mental and physical health. This systematic process also ensures that the applicant has the skill to fulfill the requirements of the position and to support the requested clinical privileges.³⁸

Clinical privileging is the process by which an LIP is permitted by law and the facility to provide medical care services within the scope of the individual’s license. Clinical privileges need to be specific, based on the individual’s clinical competence, recommended by service chiefs and the Medical Staff Executive Committee, and approved by the Director. Clinical privileges are granted for a period not to exceed two years, and LIPs must undergo re-privileging prior to the expiration of the held privileges.³⁹

The purpose of the OIG review was to determine whether the Facility complied with selected requirements for credentialing and privileging of selected members of the medical staff. The OIG team interviewed key managers and reviewed the credentialing and privileging folders of two LIPs who were hired within 18 months prior to the on-site visit,⁴⁰ and 11 LIPs who were re-privileged within 12 months prior to the visit.⁴¹ The OIG evaluated the following performance indicators:

- Credentialing
 - Current licensure
 - Primary source verification
- Privileging
 - Verification of clinical privileges
 - Requested privileges

³⁷ VHA Handbook 1100.19, *Credentialing and Privileging*, October 15, 2012. (Due for recertification October 31, 2017, but has not been updated.)

³⁸ VHA Handbook 1100.19.

³⁹ VHA Handbook 1100.19.

⁴⁰ The 18-month period was from October 23, 2016, through April 23, 2018.

⁴¹ The 12-month review period was from April 23, 2017, through April 23, 2018.

- Facility-specific
- Service-specific
- Provider-specific
- Service chief recommendation of approval for requested privileges
- Medical Staff Executive Committee decision to recommend requested privileges
- Approval of privileges for a period of less than, or equal to, two years
- Focused Professional Practice Evaluation (FPPE)
 - Evaluation initiated
 - Timeframe clearly documented
 - Criteria developed
 - Evaluation by another provider with similar training and privileges
 - Medical Staff Executive Committee decision to recommend continuing initially granted privileges
- Ongoing Professional Practice Evaluation (OPPE)
 - Determination to continue privileges
 - Criteria specific to the service or section
 - Evaluation by another provider with similar training and privileges
 - Medical Staff Executive Committee decision to recommend continuing privileges

Conclusion

Generally, the Facility met requirements with the above performance indicators. The OIG made no recommendations.

Environment of Care

Any medical center, regardless of its size or location, faces vulnerabilities in the healthcare environment. VHA requires managers to conduct EOC inspection rounds and resolve issues in a timely manner. The goal of the EOC program is to reduce and control environmental hazards and risks; prevent accidents and injuries; and maintain safe conditions for patients, visitors, and staff. The physical environment of a healthcare organization must not only be functional but should also promote healing.⁴²

The purpose of the OIG review was to determine whether the Facility maintained a clean and safe healthcare environment in accordance with applicable requirements. The OIG also determined whether the Facility met requirements in selected areas that are often associated with higher risks of harm to patients in the locked MH Unit and with Emergency Management processes.⁴³

VHA requires managers to ensure capacity for MH services for veterans with acute and severe emotional and/or behavioral symptoms causing a safety risk to self or others, and/or resulting in severely compromised functional status. This level of care is typically provided in an inpatient setting to ensure safety and to provide the type and intensity of clinical intervention necessary to treat the patient. Such care needs to be well integrated with the full continuum of care to support safety and effective management during periods of such severe difficulty. Inpatient MH settings must also provide a healing, recovery-oriented environment.⁴⁴

VHA requires managers to establish a comprehensive Emergency Management program to ensure continuity of patient care and hospital operations in the event of a disaster or emergency, which includes conducting a Hazard Vulnerability Analysis (HVA) and developing an Emergency Operations Plan (EOP).⁴⁵ These requirements allow the identification and minimization of impacts from potential hazards, threats, incidents, and events on health care and other essential services provided by facilities. VHA also requires managers to develop Utility Management Plans to ensure reliability and reduce failures of electrical power distribution systems in accordance with TJC,⁴⁶ Occupational Safety and Health Administration,⁴⁷ and

⁴² VHA Directive 1608, *Comprehensive Environment of Care*, February 1, 2016.

⁴³ Applicable requirements include various VHA Directives, Joint Commission hospital accreditation standards, Occupational Safety and Health Administration, American National Standards Institute (ANSI)/Association for the Advancement of Medical Instrumentation (AAMI), and National Fire Protection Association (NFPA).

⁴⁴ VHA Handbook 1160.06, *Inpatient Mental Health Services*, September 16, 2013.

⁴⁵ VHA Directive 0320.01, *Comprehensive Emergency Management Program Procedures*, April 6, 2017.

⁴⁶ TJC. Environment of Care standard EC.02.05.07.

⁴⁷ Occupational Safety and Health (OSHA) is part of the US Department of Labor. OSHA assures safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education, and assistance.

National Fire Protection Association standards.⁴⁸ The provision of sustained electrical power during disasters or emergencies is critical to continued operations of a healthcare facility.

In all, the OIG team inspected six patient care areas. At the Poplar Bluff campus, the OIG inspected two inpatient units—acute care (3B) and Community Living Center (4 North and South)—in addition to the urgent care (1A), primary care (1B and 1C), and specialty care (3A) clinics. The team also inspected the Sikeston CBOC. The OIG reviewed relevant documents and interviewed key employees and managers. The OIG evaluated the following location-specific performance indicators:

- Parent Facility
 - EOC rounds
 - EOC deficiency tracking
 - Infection prevention
 - General safety
 - Environmental cleanliness
 - General privacy
 - Women veterans' exam room privacy
 - Availability of medical equipment and supplies
- Community Based Outpatient Clinic
 - General safety
 - Medication safety and security
 - Infection prevention
 - Environmental cleanliness
 - General privacy
 - Exam room privacy
 - Availability of medical equipment and supplies
- Emergency Management
 - Hazard Vulnerability Analysis (HVA)
 - Emergency Operations Plan (EOP)

⁴⁸ National Fire Protection Association (NFPA) is a global nonprofit organization devoted to eliminating death, injury, and property and economic loss due to fire, electrical, and related hazards.

- Emergency power testing and availability
- Locked MH Unit⁴⁹
 - Bi-annual MH EOC Rounds
 - Nursing station security
 - Public area and general unit safety
 - Patient room safety
 - Infection prevention
 - Availability of medical equipment and supplies

Conclusion

EOC rounds, general safety, and privacy measures were in place at the parent Facility. The representative CBOC generally met the performance indicators evaluated. The OIG did not note any concerns with the availability of medical equipment and supplies. However, the OIG identified deficiencies with environmental cleanliness and management of the emergency power supply system that warranted recommendations for improvement.

Parent Facility: Environmental Cleanliness

TJC requires hospitals maintain and continually monitor the environment and remediate conditions to ensure a clean and safe environment.⁵⁰ Of the six areas inspected, three storage rooms had dirty floors and/or debris present.⁵¹ Facility managers attributed a lack of attention to detail as the reason for noncompliance.

Recommendation 1

1. The Associate Director ensures that a clean environment is maintained throughout the Facility and monitors compliance.

Facility concurred.

Target date for completion: October 1, 2018

Facility response: Inspection of the storage closet floors for cleanliness has been added to the daily inspection sheets completed by the housekeeping supervisor for each area. Results of the daily inspections are then collected, reviewed, and aggregated monthly by the Hospital

⁴⁹ The performance indicators did not apply because the Facility did not have a locked MH unit.

⁵⁰ TJC. Environment of Care standard EC.02.06.01, EP20.

⁵¹ Urgent care 1A and specialty care 3A clinics and the CLC.

Housekeeping Officer. This data will be submitted monthly to the Environment of Care (EOC) Committee until three consecutive months of 90% compliance is achieved. Ongoing monitoring will continue through unannounced rounding of the areas by the Hospital Housekeeping Supervisor and/or designee, as well as during EOC rounds. For the month of June 2018, the daily inspections have shown 92% compliance with a clean environment (194 compliant observations out of 212 total observations).

Emergency Management: Emergency Power Inspections

VHA requires facilities to perform weekly inspections of the emergency power supply system.⁵² In the event of a power disruption, the emergency power supply system enables the Facility to continue providing patient care. Testing at regular frequencies increases the likelihood of detecting reliability problems and reduces the risk of losing this critical resource when it is most needed. The OIG found that the Facility staff had not performed the required weekly inspections of the emergency power supply system because supervisors and staff were unaware of the requirement.

Recommendation 2

2. The Associate Director ensures the emergency power supply system inspections are performed weekly and monitors compliance.

Facility concurred.

Target date for completion: August 8, 2018

Facility response: Weekly emergency power supply system inspections were being conducted, however there was no formal method of documentation. Upon identification of the lack of documentation during the OIG CHIP site visit, an Emergency Power Supply System Inspection checklist was created, and put in place on May 8, 2018. Once completed for the month, the checklists are submitted to the Administrative Officer for Facilities Management Services by the Maintenance and Operations Supervisor for inclusion into the Environment of Care (EOC) Committee's monthly meeting. Submission to the EOC Committee will be required until three consecutive months of 90% compliance with weekly emergency power supply system inspections occur. Once compliance has been demonstrated for three consecutive months, ongoing monitoring will occur through unannounced rounds by the Operations and Maintenance Supervisor, and during Environment of Care (EOC) rounds. For the month of June 2018, the weekly inspection of the emergency power supply system has been completed and documented 100% of the time.

⁵² VHA Directive 1028, *Electrical Power Distribution Systems*, July 25, 2014.

Medication Management: Controlled Substances Inspection Program

The Controlled Substances (CS) Act divides controlled drugs into five categories based on whether they have a currently accepted medical treatment use in the United States, their relative abuse potential, and likelihood of causing dependence when abused.⁵³ Diversion by healthcare workers—the transfer of a legally-prescribed CS from the prescribed individual to another person for illicit use—remains a serious problem that can increase serious patient safety issues, causes harm to the diverter, and elevates the liability risk to healthcare organizations.⁵⁴

VHA requires that facility managers implement and maintain a CS inspection program to minimize the risk for loss and diversion and to enhance patient safety.⁵⁵ Requirements include the appointment of CS Coordinator(s) (CSC) and CS inspectors (CSI), procedures for inventory control, and the inspection of the pharmacy and clinical areas with CS.

The OIG review of these issues was conducted to determine whether the Facility complied with requirements related to CS security and inspections and to follow up on recommendations from the 2014 report.⁵⁶ The OIG team interviewed key managers and reviewed CS inspection reports for the prior two completed quarters;⁵⁷ monthly summaries of findings, including discrepancies, provided to the Director for the prior 12 months;⁵⁸ CS inspection quarterly trend reports for the prior four quarters;⁵⁹ and other relevant documents. The OIG evaluated the following performance indicators:

- CSC reports
 - Monthly summary of findings to the Director
 - Quarterly trend report to the Director
 - Actions taken to resolve identified problems
- Pharmacy operations
 - Annual physical security survey of the pharmacy/pharmacies by VA Police

⁵³ Drug Enforcement Agency Controlled Substance Schedules. <https://www.deadiversion.usdoj.gov/schedules/>. (Website accessed on August 21, 2017.)

⁵⁴ American Society of Health-System Pharmacists, “ASHP Guidelines on Preventing Diversion of Controlled Substances,” *American Journal of Health-System Pharmacists* 74, no. 5 (March 1, 2017): 325-348.

⁵⁵ VHA Directive 1108.02(1), *Inspection of Controlled Substances*, November 28, 2016 (Amended March 6, 2017).

⁵⁶ VA Office of Inspector General, *Combined Assessment Program Summary Report – Evaluation of the Controlled Substances Inspection Program at Veterans Health Administration Facilities*, Report No. 14-01785-184, June 10, 2014.

⁵⁷ The review period was July 1, 2017, through December 31, 2017.

⁵⁸ The review period was January 1, 2017, through December 31, 2017.

⁵⁹ The four quarters were from January 1, 2017, through December 31, 2017.

- CS ordering processes
- Inventory completion during Chief of Pharmacy transition
- Staff restrictions for monthly review of balance adjustments
- Requirements for CSCs
 - Free from conflicts of interest
 - CSC duties included in position description or functional statement
 - Completion of required CSC orientation training course
- Requirements for CSIs
 - Free from conflicts of interest
 - Appointed in writing by the Director for a term not to exceed three years
 - Hiatus of one year between any reappointment
 - Completion of required CSI certification course
 - Completion of required annual updates and/or refresher training
- CS area inspections
 - Monthly inspections
 - Rotations of CSIs
 - Patterns of inspections
 - Completion of inspections on day initiated
 - Reconciliation of dispensing between pharmacy and each dispensing area
 - Verification of CS orders
 - CS inspections performed by CSIs
- Pharmacy inspections
 - Monthly physical counts of the CS in the pharmacy by CSIs
 - Completion of inspections on day initiated
 - Security and documentation of drugs held for destruction⁶⁰

⁶⁰ The “Destructions File Holding Report” lists all drugs awaiting local destruction or turn-over to a reverse distributor. CSIs must verify there is a corresponding sealed evidence bag containing drug(s) for each destruction holding number on the report.

- Accountability for all prescription pads in pharmacy
- Verification of hard copy outpatient pharmacy CS prescriptions
- Verification of 72-hour inventories of the main vault
- Quarterly inspections of emergency drugs
- Monthly CSI checks of locks and verification of lock numbers

Conclusion

Generally, the Facility met requirements with the above performance indicators. Pharmacy managers and staff also reported that the national shortage of injectable opioid pain medications did not impact needed treatment and care of their patients based on services provided at the Facility. The OIG made no recommendations.

Mental Health Care: Post-Traumatic Stress Disorder Care

Post-Traumatic Stress Disorder (PTSD) may occur “following exposure to an extreme traumatic stressor involving direct personal experience of an event that involves actual or threatened death or serious injury; other threat to one’s physical integrity; witnessing an event that involves death, injury, or threat to the physical integrity of another person; learning about unexpected or violent death, serious harm, threat of death or injury experienced by a family member or other close associate.”⁶¹ For veterans, the most common traumatic stressor contributing to a PTSD diagnosis is war-zone related stress. Non-war zone military experiences, such as the crash of a military aircraft, may also contribute to the development of PTSD.⁶²

The PTSD screen is performed through a required national clinical reminder and is triggered for completion when the patient has his or her first visit at a VHA medical facility. The reminder typically remains active until it is completed.⁶³ VHA requires that

1. PTSD screening is performed for every new patient and then is repeated every year for the first five years post-separation and every five years thereafter, unless there is a clinical need to re-screen earlier;
2. If the patient’s PTSD screen is positive, an acceptable provider must evaluate treatment needs and assess for suicide risk; and
3. If the provider determines a need for treatment, there is evidence of referral and coordination of care.⁶⁴

To assess whether the Facility complied with the requirements related to PTSD screening, diagnostic evaluation, and referral to specialty care, the OIG team reviewed relevant documents and interviewed key employees and managers. Additionally, the OIG reviewed the electronic health records (EHR) of 43 randomly selected outpatients who had a positive PTSD screen from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

- Completion of suicide risk assessment by acceptable provider within required timeframe
- Offer to patient of further diagnostic evaluation

⁶¹ VHA Handbook 1160.03, *Programs for Veterans with Post-Traumatic Stress Disorder (PTSD)*, March 12, 2010 (rescinded November 16, 2017).

⁶² VHA Handbook 1160.03.

⁶³ A PTSD screen is not required if the patient received a PTSD diagnosis in outpatient setting in the past year; has a life expectancy of 6 months or less; has severe cognitive impairment, including dementia; is enrolled in a VHA or community-based hospice program; or has a diagnosis of cancer of the liver, pancreas, or esophagus.

⁶⁴ Department of Veterans Affairs, Information Bulletin, *Clarification of Posttraumatic Stress Disorder Screening Requirements*, August 6, 2015.

- Referral for diagnostic evaluation
- Completion of diagnostic evaluation within required timeframe

Conclusion

Generally, the Facility met requirements with the above performance indicators. The OIG made no recommendations.

Long-term Care: Geriatric Evaluations

More than nine million veterans of all ages are enrolled with VA, and 46 percent of these veterans are age 65 and over.⁶⁵ As a group, veterans experience more chronic disease and disability than their non-veteran peers. VA must plan for the growing health demands by aging veterans and to have mechanisms in place for delivering those services in an appropriate and cost-effective manner.⁶⁶ Participants in geriatric evaluation (GE) programs have been shown to be significantly less likely to lose functional ability, experience health-related restrictions in their daily activities, or use home healthcare services.⁶⁷

In 1999, the Veterans Millennium Benefits and Healthcare Act mandated that the veterans' standard benefits package include access to GE.⁶⁸ This includes a comprehensive, multidimensional assessment and the development of an interdisciplinary plan of care. The healthcare team would then manage the patient with treatment, rehabilitation, health promotion, and social service interventions necessary for fulfillment of the plan of care by key personnel.⁶⁹ Facility leaders must also evaluate the GE program through a review of program objectives, procedures for monitoring care processes and outcomes, and analyses of findings.⁷⁰

In determining whether the Facility provided an effective geriatric evaluation, OIG staff reviewed relevant documents and interviewed key employees and managers. Additionally, the team reviewed the EHRs of 43 patients who received a GE from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

- Provision of or access to GE
- Program oversight and evaluation
 - Evidence of GE program evaluation
 - Evidence of performance improvement activities through leadership board
- Provision of clinical care
 - Medical evaluation by GE provider

⁶⁵ VHA Directive 1140.04, *Geriatric Evaluation*, November 28, 2017.

⁶⁶ VHA Directive 1140.04.

⁶⁷ Chad Boulton, Lisa B. Boulton, Lynne Morishita, Bryan Dowd, Robert L. Kane, and Cristina F. Urdangarin, "A randomized clinical trial of outpatient geriatric evaluation and management," *Journal of the American Geriatrics Society* 49, no. 4 (April 2001): 351–359.

⁶⁸ Public Law 106-117.

⁶⁹ VHA Directive 1140.11, *Uniform Geriatrics and Extended Care Services in VA Medical Centers and Clinics*, October 11, 2016.

⁷⁰ VHA Directive 1140.04.

- Assessment by GE nurse
- Comprehensive psychosocial assessment by GE social worker
- Patient or family education
- Plan of care based on GE
- Geriatric management
 - Implementation of interventions noted in plan of care

Conclusion

Generally, the Facility met requirements with the above performance indicators. The OIG made no recommendations.

Women's Health: Mammography Results and Follow-Up

In 2017, an estimated 252,710 new cases of invasive breast cancer and 40,610 breast cancer deaths were expected to occur among US women.⁷¹ Timely screening, diagnosis, notification, and treatment are essential to early detection and optimal patient outcomes.

The Veteran's Health Care Amendments of 1983 mandated VA provide veterans with preventive care, including breast cancer screening.⁷² The Veterans Health Care Act of 1992 also authorized VA to provide gender-specific services including mammography services to eligible women veterans.⁷³

VHA has established timeframes for clinicians to notify ordering providers and patients of mammography results. "Incomplete" and "probably benign" results must be communicated to the ordering provider within 30 days of the procedure and to the patient within 14 calendar days from the date the results are available to the ordering provider. "Suspicious" and "highly suggestive of malignancy" results must be communicated to the ordering provider within three business days of the procedure, and the recommended course of action should be communicated to the patient as soon as possible, with seven calendar days representing the outer acceptable limit. Communication with patients must be documented.⁷⁴

The OIG team examined whether the Facility complied with selected VHA requirements for the reporting of mammography results by reviewing relevant documents and interviewing selected employees and managers. The team also reviewed the EHRs of 45 randomly selected women veteran patients who received a mammogram from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

- Electronic linking of mammogram results to radiology order
- Scanning of hard copy mammography reports, if outsourced
- Inclusion of required components in mammography reports
- Communication of results and any recommended course of action to ordering provider
- Communication of results and any recommended course of action to patient

⁷¹ U.S. Breast Cancer Statistics. <http://www.BreastCancer.org>. (Website accessed on May 18, 2017.)

⁷² VHA Handbook 1105.03, *Mammography Program Procedures and Standards*, April 28, 2011 (Handbook rescinded and replaced with VHA Directive 1105.03, *Mammography Program Procedures and Standards*, May 21, 2018).

⁷³ Veterans Health Care Act of 1992, Title I, Publ L. 102-585 (1992).

⁷⁴ VHA Directive 1330.01(2), *Health Care Services for Women Veterans*, February 15, 2017 (amended September 8, 2017, and further amended July 24, 2018).

- Performance of follow-up mammogram if indicated
- Performance of follow-up study⁷⁵

Conclusion

Generally, the Facility met requirements with the above performance indicators. The OIG made no recommendations.

⁷⁵ This performance indicator did not apply to this Facility.

Appendix A: Summary Table of Comprehensive Healthcare Inspection Program Review Findings

| Healthcare Processes | Performance Indicators | Conclusion |
|-------------------------------------|--|---|
| Leadership and Organizational Risks | <ul style="list-style-type: none">• Executive leadership stability and engagement• Employee satisfaction and patient experience• Accreditation/for-cause surveys and oversight inspections• Indicators for possible lapses in care• VHA performance data | Two OIG recommendations, related to environment of care deficiencies that can lead to patient and staff safety issues or adverse events, are attributable to the Associate Director. See details below. |

| Healthcare Processes | Performance Indicators | Critical Recommendations for Improvement | Recommendations for Improvement |
|-------------------------------|--|--|--|
| Quality, Safety, and Value | <ul style="list-style-type: none">• Protected peer review of clinical care• UM reviews• Patient safety incident reporting and RCAs | <ul style="list-style-type: none">• None | <ul style="list-style-type: none">• None |
| Credentialing and Privileging | <ul style="list-style-type: none">• Medical licenses• Privileges• FPPEs• OPPEs | <ul style="list-style-type: none">• None | <ul style="list-style-type: none">• None |

| Healthcare Processes | Performance Indicators | Critical Recommendations for Improvement | Recommendations for Improvement |
|----------------------|--|---|--|
| Environment of Care | <ul style="list-style-type: none"> • Parent Facility • EOC rounds and deficiency tracking • Infection prevention • General safety • Environmental cleanliness • General and exam room privacy • Availability of medical equipment and supplies • CBOC • General safety • Medication safety and security • Infection prevention • Environmental cleanliness • General and exam room privacy • Availability of medical equipment and supplies • Locked MH Unit • Bi-annual MH EOC rounds • Nursing station security • Public area and general unit safety • Patient room safety • Infection prevention • Availability of medical equipment and supplies • Emergency Management • Hazard Vulnerability Analysis (HVA) • Emergency Operations Plan (EOP) • Emergency power testing and availability | <ul style="list-style-type: none"> • Emergency power supply system inspections are performed weekly. | <ul style="list-style-type: none"> • A clean environment is maintained throughout the Facility. |

| Healthcare Processes | Performance Indicators | Critical Recommendations for Improvement | Recommendations for Improvement |
|---|--|--|--|
| Medication Management | <ul style="list-style-type: none"> • CSC reports • Pharmacy operations • Annual physical security survey • CS ordering processes • Inventory completion during Chief of Pharmacy transition • Review of balance adjustments • CSC requirements • CSI requirements • CS area inspections • Pharmacy inspections | <ul style="list-style-type: none"> • None | <ul style="list-style-type: none"> • None |
| Mental Health Care: Post-Traumatic Stress Disorder Care | <ul style="list-style-type: none"> • Suicide risk assessment • Offer of further diagnostic evaluation • Referral for diagnostic evaluation • Completion of diagnostic evaluation | <ul style="list-style-type: none"> • None | <ul style="list-style-type: none"> • None |
| Long-Term Care: Geriatric Evaluations | <ul style="list-style-type: none"> • Provision of or access to geriatric evaluation • Program oversight and evaluation requirements • Geriatric evaluation requirements • Geriatric management requirements | <ul style="list-style-type: none"> • None | <ul style="list-style-type: none"> • None |
| Women's Health: Mammography Results and Follow-Up | <ul style="list-style-type: none"> • Result linking • Report scanning and content • Communication of results and recommended actions • Follow-up mammograms and studies | <ul style="list-style-type: none"> • None | <ul style="list-style-type: none"> • None |

Appendix B: Facility Profile and VA Outpatient Clinic Profiles

Facility Profile

The table below provides general background information for this low complexity (3)⁷⁶ Facility reporting to VISN 15.

**Table 7. Facility Profile for Poplar Bluff (657A4)
(October 1, 2014, through September 30, 2017)**

| Profile Element | Facility Data FY 2015 ⁷⁷ | Facility Data FY 2016 ⁷⁸ | Facility Data FY 2017 ⁷⁹ |
|---------------------------------------|--|--|--|
| Total Medical Care Budget in Millions | \$130.2 | \$120.9 | \$125.7 |
| Number of: | | | |
| • Unique Patients | 21,182 | 21,291 | 21,626 |
| • Outpatient Visits | 204,863 | 221,128 | 224,215 |
| • Unique Employees ⁸⁰ | 482 | 491 | 523 |
| Type and Number of Operating Beds: | | | |
| • Community Living Center | 40 | 40 | 40 |
| • Medicine | 18 | 13 | 13 |
| Average Daily Census: | | | |
| • Community Living Center | 29 | 26 | 25 |
| • Medicine | 5 | 4 | 4 |

Source: VA Office of Academic Affiliations, VHA Support Service Center, and VA Corporate Data Warehouse

⁷⁶ The VHA medical centers are classified according to a facility complexity model; 3 designation indicates a Facility with low volume, low-risk patients, few or no complex clinical programs, and small or no research and teaching programs.

⁷⁷ October 1, 2014, through September 30, 2015.

⁷⁸ October 1, 2015, through September 30, 2016.

⁷⁹ October 1, 2016, through September 30, 2017.

⁸⁰ Unique employees involved in direct medical care (cost center 8200).

VA Outpatient Clinic Profiles⁸¹

The VA outpatient clinics in communities within the catchment area of the Facility provide PC integrated with women's health, MH, and telehealth services. Some also provide specialty care, diagnostic, and ancillary services. Table 8 provides information relative to each of the clinics.

Table 8. VA Outpatient Clinic Workload/Encounters⁸² and Specialty Care, Diagnostic, and Ancillary Services Provided (October 1, 2016, through September 30, 2017)

| Location | Station No. | PC Workload/ Encounters | MH Workload/ Encounters | Specialty Care Services ⁸³ Provided | Diagnostic Services ⁸⁴ Provided | Ancillary Services ⁸⁵ Provided |
|-----------------|-------------|-------------------------|-------------------------|--|--|---|
| West Plains, MO | 657GF | 7,824 | 2,453 | Dermatology Endocrinology Poly-Trauma | Radiology | Nutrition Pharmacy Social Work Weight Management |
| Paragould, AR | 657GG | 5,879 | 2,821 | Dermatology Endocrinology | n/a | Nutrition Weight Management |

⁸¹ Includes all outpatient clinics in the community that were in operation as of February 15, 2018.

⁸² An encounter is a professional contact between a patient and a practitioner vested with responsibility for diagnosing, evaluating, and treating the patient's condition.

⁸³ Specialty care services refer to non-PC and non-MH services provided by a physician.

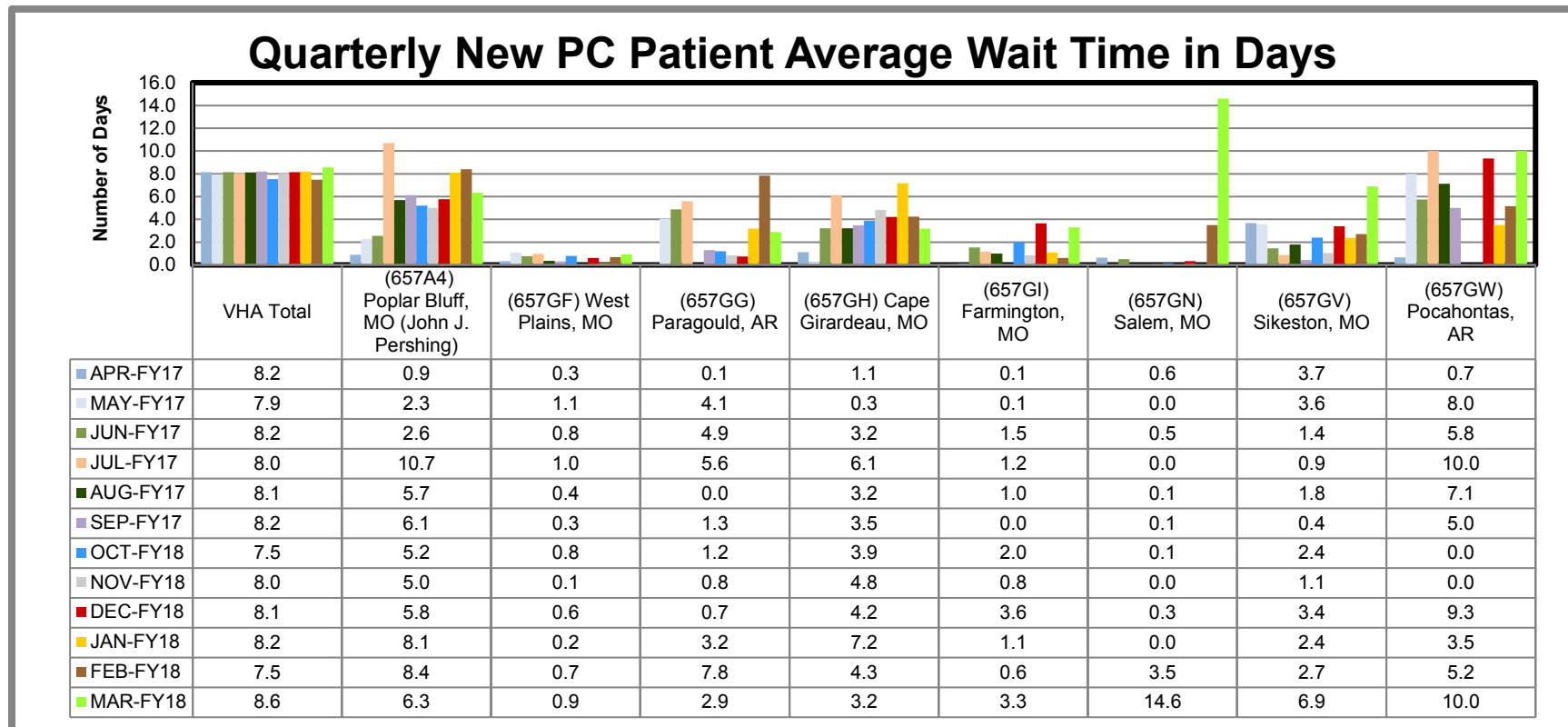
⁸⁴ Diagnostic services include EKG, EMG, laboratory, nuclear medicine, radiology, and vascular lab services.

⁸⁵ Ancillary services include chiropractic, dental, nutrition, pharmacy, prosthetic, social work, and weight management services.

| Location | Station No. | PC Workload/ Encounters | MH Workload/ Encounters | Specialty Care Services ⁸³ Provided | Diagnostic Services ⁸⁴ Provided | Ancillary Services ⁸⁵ Provided |
|-----------------------|-------------|----------------------------|----------------------------|--|--|---|
| Cape Girardeau, MO | 657GH | 8,335 | 6,287 | Dermatology Endocrinology | n/a | Pharmacy Nutrition Weight Management |
| Farmington, MO | 657GI | 8,780 | 3,454 | Dermatology Endocrinology | n/a | Nutrition Weight Management |
| Salem, MO | 657GN | 1,063 | n/a | n/a | n/a | n/a |
| Sikeston, MO | 657GV | 3,725 | 1,623 | Dermatology Endocrinology | n/a | Nutrition Weight Management |
| Pocahontas, AR | 657GW | 577 | 157 | n/a | n/a | n/a |

Source: VHA Support Service Center and VA Corporate Data Warehouse
n/a =not applicable

Appendix C: Patient Aligned Care Team Compass Metrics⁸⁶

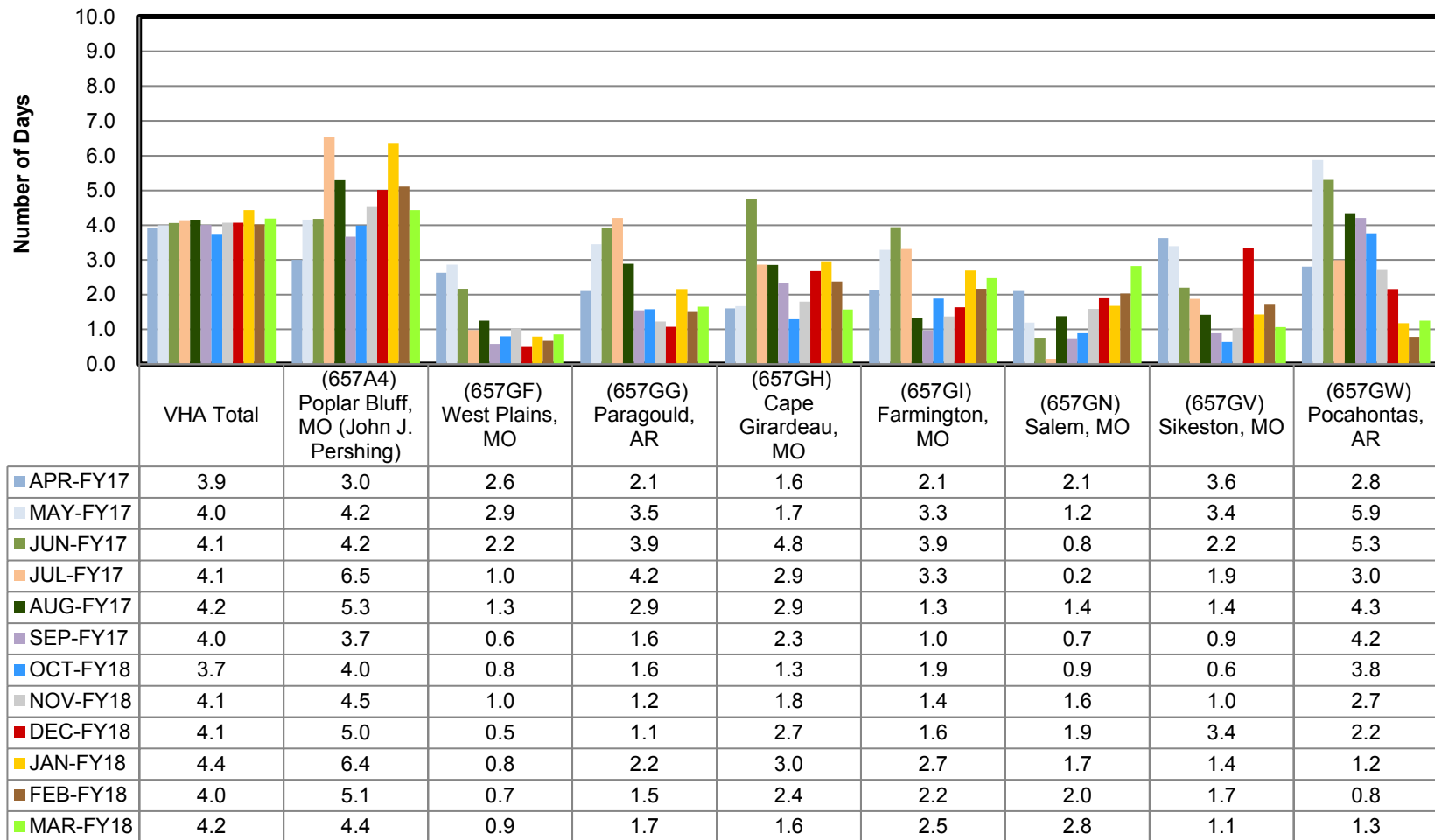


Source: VHA Support Service Center

Data Definition: The average number of calendar days between a new patient's PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic Appointment, Completed Appointment) from the completed appointment date. Note that prior to FY 2015, this metric was calculated using the earliest possible create date.

⁸⁶ Department of Veterans' Affairs, Patient Aligned Care Teams Compass Data Definitions, accessed September 11, 2017.

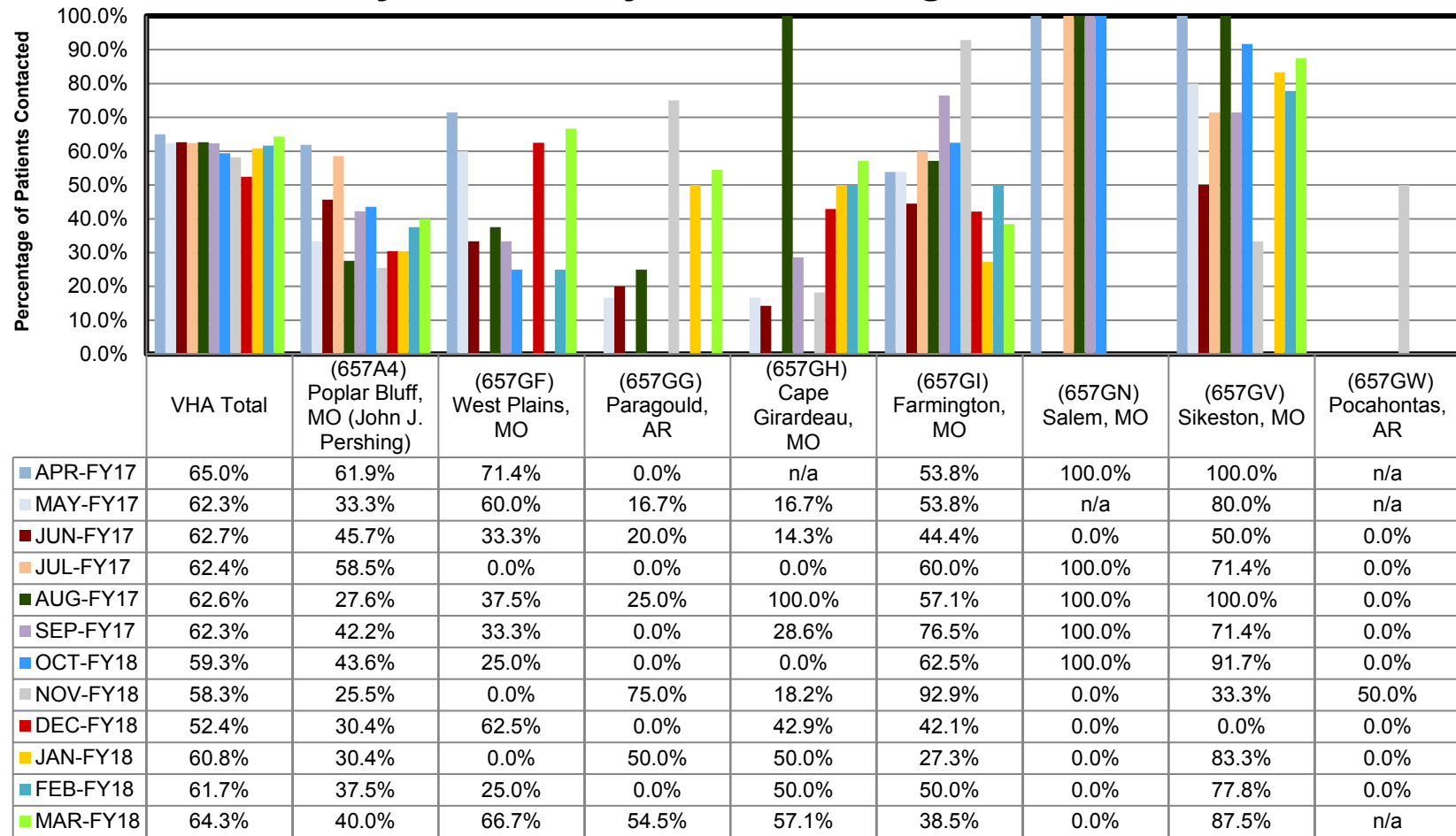
Quarterly Established PC Patient Average Wait Time in Days



Source: VHA Support Service Center

Data Definition: The average number of calendar days between an established patient's PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic Appointment, Completed Appointment) from the completed appointment date.

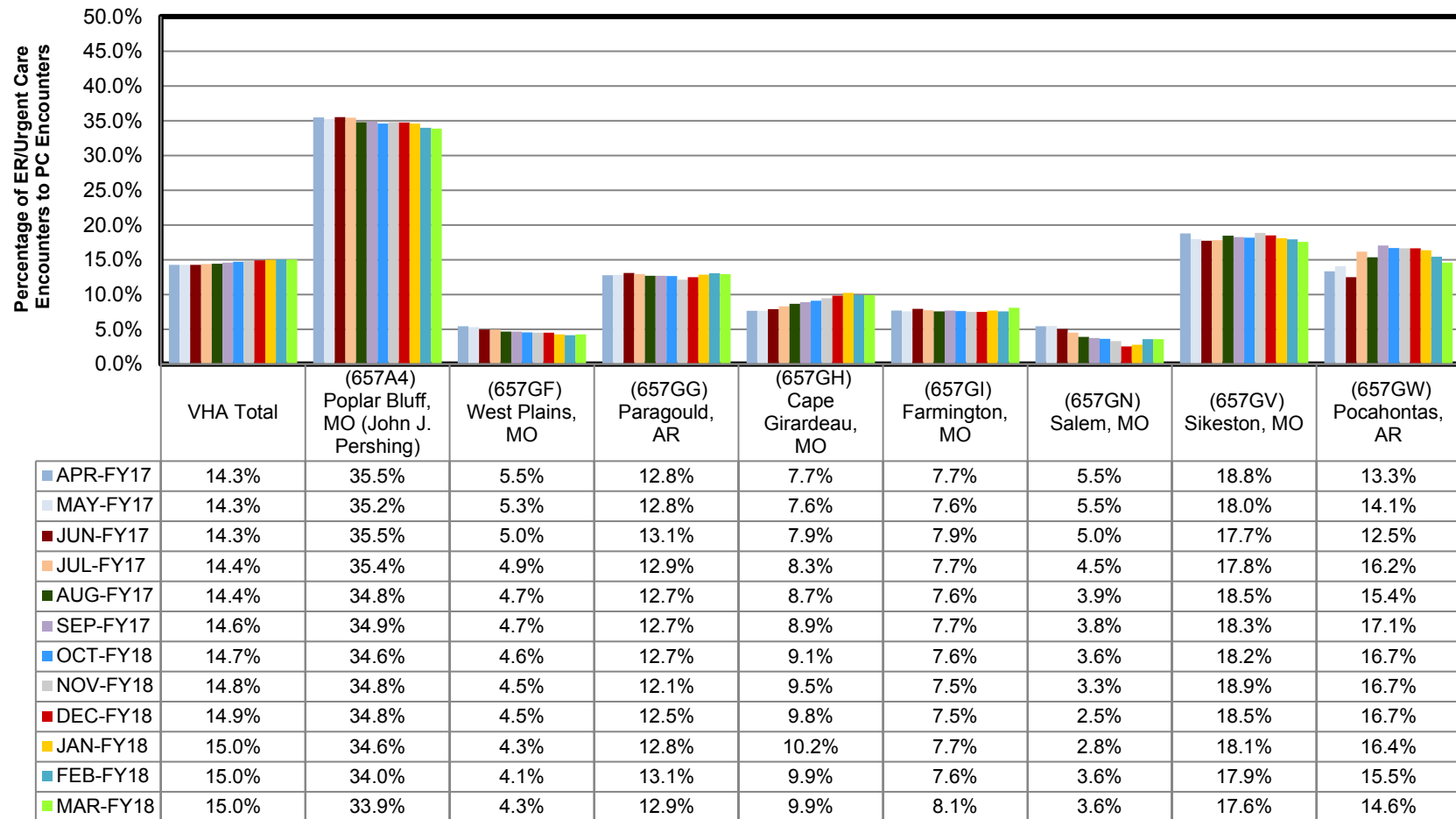
Quarterly Team 2-Day Post Discharge Contact Ratio



Source: VHA Support Service Center

Data Definition: The percent of assigned PC patients discharged from any VA facility who have been contacted by a PC team member within 2 business days during the reporting period. Patients are excluded if they are discharged from an observation specialty and/or readmitted within 2 business days to any VA facility. Team members must have been assigned to the patient's team at the time of the patient's discharge. Team member identification is based on the primary provider on the encounter. Performance measure mnemonic "PACT17." The absence of reported data is indicated by "n/a."

Quarterly Ratio of ER/Urgent Care Encounters While on Panel to PC Encounters While on Panel (FEE ER Excluded)



Source: VHA Support Service Center

Data Definition: This is a measure of where the patient receives his PC and by whom. A low percentage is better. The formula is the total VHA ER/Urgent Care Encounters While on Team (WOT) with a LIP divided by the number of PC Team Encounters WOT with an LIP **plus** the total number of VHA ER/Urgent Care Encounters WOT with an LIP.

Appendix D: Strategic Analytics for Improvement and Learning (SAIL) Metric Definitions⁸⁷

| Measure | Definition | Desired Direction |
|----------------------------|--|---|
| ACSC Hospitalization | Ambulatory Care Sensitive Conditions hospitalizations | A lower value is better than a higher value |
| Adjusted LOS | Acute care risk adjusted length of stay | A lower value is better than a higher value |
| Admit Reviews Met | % Acute Admission Reviews that meet InterQual criteria | A higher value is better than a lower value |
| Best Place to Work | All Employee Survey Best Places to Work score | A higher value is better than a lower value |
| Call Center Responsiveness | Average speed of call center responded to calls in seconds | A lower value is better than a higher value |
| Call Responsiveness | Call center speed in picking up calls and telephone abandonment rate | A lower value is better than a higher value |
| Capacity | Physician Capacity | A lower value is better than a higher value |
| Care Transition | Care Transition (Inpatient) | A higher value is better than a lower value |
| Complications | Acute care risk adjusted complication ratio (observed to expected ratio) | A lower value is better than a higher value |
| Comprehensiveness | Comprehensiveness (PCMH) | A higher value is better than a lower value |
| Cont Stay Reviews Met | % Acute Continued Stay reviews that meet InterQual criteria | A higher value is better than a lower value |
| Efficiency | Overall efficiency measured as 1 divided by SFA (Stochastic Frontier Analysis) | A higher value is better than a lower value |
| Efficiency/Capacity | Efficiency and Physician Capacity | A higher value is better than a lower value |

⁸⁷ VHA Support Service Center (VSSC), Strategic Analytics for Improvement and Learning (SAIL), accessed: February 14, 2018.

| Measure | Definition | Desired Direction |
|-----------------------|---|---|
| Employee Satisfaction | Overall satisfaction with job | A higher value is better than a lower value |
| HC Assoc Infections | Healthcare associated infections | A lower value is better than a higher value |
| HEDIS Like | Outpatient performance measure (HEDIS) | A higher value is better than a lower value |
| HEDIS Like – HED90_1 | HEDIS-EPRP Based PRV TOB BHS | A higher value is better than a lower value |
| HEDIS Like – HED90_ec | HEDIS-eOM Based DM IHD | A higher value is better than a lower value |
| MH Wait Time | MH care wait time for new patient completed appointments within 30 days of preferred date | A higher value is better than a lower value |
| MH Continuity Care | MH continuity of care (FY14Q3 and later) | A higher value is better than a lower value |
| MH Exp of Care | MH experience of care (FY14Q3 and later) | A higher value is better than a lower value |
| MH Popu Coverage | MH population coverage (FY14Q3 and later) | A higher value is better than a lower value |
| Oryx | Inpatient performance measure (ORYX) | A higher value is better than a lower value |
| PC Routine Care Appt | Timeliness in getting a PC routine care appointment (PCMH) | A higher value is better than a lower value |
| PC Urgent Care Appt | Timeliness in getting a PC urgent care appointment (PCMH) | A higher value is better than a lower value |
| PCMH Same Day Appt | Days waited for appointment when needed care right away (PCMH) | A higher value is better than a lower value |
| PCMH Survey Access | Timely Appointment, care and information (PCMH) | A higher value is better than a lower value |
| PC Wait Time | PC wait time for new patient completed appointments within 30 days of preferred date | A higher value is better than a lower value |
| PSI | Patient safety indicator (observed to expected ratio) | A lower value is better than a higher value |
| Rating Hospital | Overall rating of hospital stay (inpatient only) | A higher value is better than a lower value |

| Measure | Definition | Desired Direction |
|----------------------|--|---|
| Rating PC Provider | Rating of PC providers (PCMH) | A higher value is better than a lower value |
| Rating SC Provider | Rating of specialty care providers (specialty care) | A higher value is better than a lower value |
| RN Turnover | Registered nurse turnover rate | A lower value is better than a higher value |
| RSMR-AMI | 30-day risk standardized mortality rate for acute myocardial infarction | A lower value is better than a higher value |
| RSMR-CHF | 30-day risk standardized mortality rate for congestive heart failure | A lower value is better than a higher value |
| RSMR-COPD | 30-day risk standardized mortality rate for COPD | A lower value is better than a higher value |
| RSMR-Pneumonia | 30-day risk standardized mortality rate for pneumonia | A lower value is better than a higher value |
| RSRR-AMI | 30-day risk standardized readmission rate for acute myocardial infarction | A lower value is better than a higher value |
| RSRR-Cardio | 30-day risk standardized readmission rate for cardiorespiratory patient cohort | A lower value is better than a higher value |
| RSRR-CHF | 30-day risk standardized readmission rate for congestive heart failure | A lower value is better than a higher value |
| RSRR-COPD | 30-day risk standardized readmission rate for COPD | A lower value is better than a higher value |
| RSRR-CV | 30-day risk standardized readmission rate for cardiovascular patient cohort | A lower value is better than a higher value |
| RSRR-HWR | Hospital wide readmission | A lower value is better than a higher value |
| RSRR-Med | 30-day risk standardized readmission rate for medicine patient cohort | A lower value is better than a higher value |
| RSRR-Neuro | 30-day risk standardized readmission rate for neurology patient cohort | A lower value is better than a higher value |
| RSRR-Pneumonia | 30-day risk standardized readmission rate for pneumonia | A lower value is better than a higher value |
| RSRR-Surg | 30-day risk standardized readmission rate for surgery patient cohort | A lower value is better than a higher value |
| SC Routine Care Appt | Timeliness in getting a SC routine care appointment (Specialty Care) | A higher value is better than a lower value |

| Measure | Definition | Desired Direction |
|--------------------------|--|---|
| SC Survey Access | Timely Appointment, care and information (Specialty Care) | A higher value is better than a lower value |
| SC Urgent Care Appt | Timeliness in getting a SC urgent care appointment (Specialty Care) | A higher value is better than a lower value |
| SMR | Acute care in-hospital standardized mortality ratio | A lower value is better than a higher value |
| SMR30 | Acute care 30-day standardized mortality ratio | A lower value is better than a higher value |
| Specialty Care Wait Time | Specialty care wait time for new patient completed appointments within 30 days of preferred date | A higher value is better than a lower value |
| Stress Discussed | Stress Discussed (PCMH Q40) | A higher value is better than a lower value |

Source: VHA Support Service Center

Appendix E: VISN Director Comments

Department of Veterans Affairs Memorandum

Date: July 25, 2018

From: Director, VA Heartland Network (10N15)

Subj: CHIP Review of the John J. Pershing VA Medical Center, Poplar Bluff, MO

To: Director, Los Angeles Office of Healthcare Inspections (54LA)

Director, Management Review Service (VHA 10E1D MRS Action)

1. In response to the findings of CHIP Review of the John J. Pershing VA Medical Center, Poplar Bluff, MO conducted during the week of April 23, 2018, the facility has taken actions to address both recommendations.
2. I have reviewed and concur with the report, findings, recommendation and actions submitted by the facility. Monitoring of completion and sustainment of the actions will be done.

(Original signed by:)

William P. Patterson, MD, MSS
Network Director, VA Heartland Network

*For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Americans with Disabilities Act.*

Appendix F: Facility Director Comments

Department of Veterans Affairs Memorandum

Date: July 25, 2018

From: Director, John J. Pershing VA Medical Center (657A4/00)

Subj: CHIP Review of the John J. Pershing VA Medical Center, Poplar Bluff, MO

To: Director, VA Heartland Network (10N15)

1. I have reviewed the draft report of the Office of the Inspector General's Comprehensive Healthcare Inspection Program review of the John J. Pershing VA Medical Center in Poplar Bluff, Missouri.
2. I concur with the findings and recommendations. Please see the attached responses to the recommendations identified in the review.
3. We appreciate the opportunity for this review as a continuing process to improve the care provided to our Veterans.

(Original signed by:)

Patricia L. Hall PhD, FACHE
Medical Center Director

*For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Americans with Disabilities Act.*

OIG Contact and Staff Acknowledgments

| | |
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