



**Department of Veterans Affairs
Office of Inspector General**

Office of Healthcare Inspections

Report No. 15-00614-64

**Combined Assessment Program
Review of the
Oklahoma City VA
Health Care System
Oklahoma City, Oklahoma**

December 16, 2015

Washington, DC 20420

To Report Suspected Wrongdoing in VA Programs and Operations

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(Hotline Information: www.va.gov/oig/hotline)

Glossary

AD	advance directive
CAP	Combined Assessment Program
CT	computed tomography
EAM	emergency airway management
EHR	electronic health record
EOC	environment of care
facility	Oklahoma City VA Health Care System
FY	fiscal year
MH	mental health
NA	not applicable
NM	not met
OIG	Office of Inspector General
QM	quality management
SCI	spinal cord injury
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network

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Executive Summary

Review Purpose: The purpose of the review was to evaluate selected health care facility operations, focusing on patient care quality and the environment of care, and to provide crime awareness briefings. We conducted the review the week of September 14, 2015.

Review Results: The review covered eight activities. We made no recommendations in the following three activities:

- Advance Directives
- Surgical Complexity
- Emergency Airway Management

The facility's reported accomplishment was participation in the National Surgical Flow collaborative to improve access in the outpatient orthopedic clinic.

Recommendations: We made recommendations in the following five activities:

Quality Management: Ensure credentialing and privileging folders do not contain non-allowed information.

Environment of Care: Ensure patient care areas are clean and bathrooms are free from offensive odors. Initiate corrective actions to repair the ceiling leak in the operating room supply area. Secure sensitive patient information at all times.

Medication Management: Annually review the look-alike and sound-alike medication list. Develop a written policy for the safe use of automated dispensing machines, and implement the policy.

Coordination of Care: Ensure that requestors consistently select the proper consult title and that consultants consistently link consult responses to the requests.

Computed Tomography Radiation Monitoring: Ensure all computed tomography technologists have documented training on safe procedures for operating the types of computed tomography equipment they use.

Comments

The Veterans Integrated Service Network Director and Acting Facility Director agreed with the Combined Assessment Program review findings and recommendations and provided acceptable improvement plans. (See Appendixes C and D, pages 23–27, for the full text of the Directors' comments.) We will follow up on the planned actions until they are completed.



JOHN D. DAIGH, JR., M.D.
Assistant Inspector General for
Healthcare Inspections

Objectives and Scope

Objectives

CAP reviews are one element of the OIG's efforts to ensure that our Nation's veterans receive high quality VA health care services. The objectives of the CAP review are to:

- Conduct recurring evaluations of selected health care facility operations, focusing on patient care quality and the EOC.
- Provide crime awareness briefings to increase employee understanding of the potential for program fraud and the requirement to refer suspected criminal activity to the OIG.

Scope

The scope of the CAP review is limited. Serious issues that come to our attention that are outside the scope will be considered for further review separate from the CAP process and may be referred accordingly.

For this review, we examined selected clinical and administrative activities to determine whether facility performance met requirements related to patient care quality and the EOC. In performing the review, we inspected selected areas, conversed with managers and employees, and reviewed clinical and administrative records. The review covered the following eight activities:

- QM
- EOC
- Medication Management
- Coordination of Care
- CT Radiation Monitoring
- ADs
- Surgical Complexity
- EAM

We have listed the general information reviewed for each of these activities. Some of the items listed may not have been applicable to this facility because of a difference in size, function, or frequency of occurrence.

The review covered facility operations for FY 2014 and FY 2015 through September 17, 2015, and inspectors conducted the review in accordance with OIG standard operating procedures for CAP reviews. We also asked the facility to provide the status on the recommendations we made in our previous CAP report (*Combined Assessment Program Review of the Oklahoma City VA Medical Center, Oklahoma City, Oklahoma*, Report No. 12-04189-95, January 28, 2013).

During this review, we presented crime awareness briefings for 339 employees. These briefings covered procedures for reporting suspected criminal activity to the OIG and included case-specific examples illustrating procurement fraud, conflicts of interest, and bribery.

Additionally, we surveyed employees regarding patient safety and quality of care at the facility. We distributed an electronic survey to all facility employees and received 504 responses. We shared summarized results with facility managers.

In this report, we make recommendations for improvement. Recommendations pertain to issues that are significant enough for the OIG to monitor until the facility implements corrective actions.

Reported Accomplishment

National Surgical Flow Collaborative

The facility was selected to participate in the National Surgical Flow collaborative. The goal of the collaborative was to improve access in the outpatient orthopedic clinic. The team monitored multiple measures and outcomes. Through systems redesign, the clinic transformed from an individual provider model to a team concept. The average days from consult request to appointment created decreased from 26.27 days in August 2014 to 5.58 days in June 2015. The average days from consult request to appointment date decreased from 50.47 days in August 2014 to 10.15 days in June 2015. The average days from consult request to orthopedic surgery date decreased from 232 days in December 2014 to 64 days in August 2015. The missed opportunity rate decreased from an average of 12.59 percent in May 2014 to 8 percent in August 2015.

Results and Recommendations

QM

The purpose of this review was to determine whether facility senior managers actively supported and appropriately responded to QM efforts and whether the facility met selected requirements within its QM program.^a

We conversed with senior managers and key QM employees, and we evaluated meeting minutes, 10 credentialing and privileging folders, and other relevant documents. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement. Any items that did not apply to this facility are marked NA.

NM	Areas Reviewed	Findings	Recommendations
	There was a senior-level committee responsible for key quality, safety, and value functions that met at least quarterly and was chaired or co-chaired by the Facility Director. <ul style="list-style-type: none"> • The committee routinely reviewed aggregated data. • QM, patient safety, and systems redesign appeared to be integrated. 		
	Peer reviewed deaths met selected requirements: <ul style="list-style-type: none"> • Peers completed reviews within specified timeframes. • The Peer Review Committee reviewed cases receiving initial Level 2 or 3 ratings. • Involved providers were invited to provide input prior to the final Peer Review Committee determination. 		

NM	Areas Reviewed (continued)	Findings	Recommendations
X	<p>Credentialing and privileging processes met selected requirements:</p> <ul style="list-style-type: none"> • Facility managers reviewed privilege forms annually and ensured proper approval of revised forms. • Facility managers ensured appropriate privileges for licensed independent practitioners. • Facility managers removed licensed independent practitioners' access to patients' EHRs upon separation. • Facility managers properly maintained licensed independent practitioners' folders. 	<ul style="list-style-type: none"> • All 10 folders contained non-allowed information. 	<p>1. We recommended that facility managers ensure that credentialing and privileging folders do not contain non-allowed information.</p>
	<p>Observation bed use met selected requirements:</p> <ul style="list-style-type: none"> • The facility gathered data regarding appropriateness of observation bed usage. • The facility reassessed observation criteria and/or utilization if conversions to acute admissions were consistently 25–30 percent or more. 		
	<p>The process to review resuscitation events met selected requirements:</p> <ul style="list-style-type: none"> • An interdisciplinary committee reviewed episodes of care where resuscitation was attempted. • Resuscitation event reviews included screening for clinical issues prior to events that may have contributed to the occurrence of the code. • The facility collected data that measured performance in responding to events. 		

NM	Areas Reviewed (continued)	Findings	Recommendations
	<p>The surgical review process met selected requirements:</p> <ul style="list-style-type: none"> • An interdisciplinary committee with appropriate leadership and clinical membership met monthly to review surgical processes and outcomes. • The Surgical Work Group reviewed surgical deaths with identified problems or opportunities for improvement. • The Surgical Work Group reviewed additional data elements. 		
	<p>Clinicians appropriately reported critical incidents.</p>		
	<p>The safe patient handling program met selected requirements:</p> <ul style="list-style-type: none"> • A committee provided program oversight. • The committee gathered, tracked, and shared patient handling injury data. 		
	<p>The process to review the quality of entries in the EHR met selected requirements:</p> <ul style="list-style-type: none"> • A committee reviewed EHR quality. • A committee analyzed data at least quarterly. • Reviews included data from most services and program areas. 		
	<p>The policy for scanning internal forms into EHRs included the following required items:</p> <ul style="list-style-type: none"> • Quality of the source document and an alternative means of capturing data when the quality of the document is inadequate. • A correction process if scanned items have errors. 		

NM	Areas Reviewed (continued)	Findings	Recommendations
	<ul style="list-style-type: none"> • A complete review of scanned documents to ensure readability and retrievability of the record and quality assurance reviews on a sample of the scanned documents. 		
	Overall, if QM reviews identified significant issues, the facility took actions and evaluated them for effectiveness.		
	Overall, senior managers actively participated in performance improvement over the past 12 months.		
	Overall, the facility had a comprehensive, effective QM program over the past 12 months.		
	The facility met any additional elements required by VHA or local policy.		

EOC

The purpose of this review was to determine whether the facility maintained a clean and safe health care environment in accordance with applicable requirements. We also determined whether the facility met selected requirements in emergency management.^b

We inspected the inpatient MH and intensive care units; the medicine/surgery, women veterans, and specialty clinics; the surgical suite; the Homeless Program; the Emergency Department; and the community living center. Additionally, we reviewed relevant documents, including 20 employee training and competency records, and conversed with key employees and managers. The table below shows the areas reviewed for this topic. The areas marked as NM did not meet applicable requirements and needed improvement. Any items that did not apply to this facility are marked NA.

NM	Areas Reviewed for General EOC	Findings	Recommendations
	EOC Committee minutes reflected sufficient detail regarding identified deficiencies, corrective actions taken, and tracking of corrective actions to closure for the facility and the community based outpatient clinics.		
	The facility conducted an infection prevention risk assessment.		
	Infection Prevention/Control Committee minutes documented discussion of identified high-risk areas, actions implemented to address those areas, and follow-up on implemented actions and included analysis of surveillance activities and data.		
	The facility had established a process for cleaning equipment.		
	The facility conducted required fire drills in buildings designated for health care occupancy and documented drill critiques.		
	The facility had a policy/procedure/guideline for identification of individuals entering the facility, and units/areas complied with requirements.		

NM	Areas Reviewed for General EOC (continued)	Findings	Recommendations
	The facility met fire safety requirements.		
X	The facility met environmental safety requirements.	<ul style="list-style-type: none"> • Seven of 10 patient care areas were in need of cleaning and dusting. • In two of 10 patient care areas, bathrooms had an offensive odor. • There was an ongoing ceiling leak in an operating room supply area. 	<p>2. We recommended that facility managers ensure patient care areas are clean and bathrooms are free from offensive odors and monitor compliance.</p> <p>3. We recommended that facility managers initiate corrective actions to repair the ceiling leak in the operating room supply area.</p>
	The facility met infection prevention requirements.		
	The facility met medication safety and security requirements.		
X	The facility met privacy requirements.	<ul style="list-style-type: none"> • In seven of 10 patient care areas, computers were positioned in a manner so that sensitive patient information was visible to the public. 	<p>4. We recommended that employees secure sensitive patient information at all times and that facility managers monitor compliance.</p>
	The facility complied with any additional elements required by VHA, local policy, or other regulatory standards.		
Areas Reviewed for SCI Center			
NA	The facility completed and documented required inspection checklists of all ceiling mounted patient lifts.		
NA	The facility met fire safety requirements in the SCI Center.		
NA	The facility met environmental safety requirements in the SCI Center.		
NA	The facility met infection prevention requirements in the SCI Center.		
NA	The facility met medication safety and security requirements in the SCI Center.		
NA	The facility met patient privacy requirements in the SCI Center.		

NM	Areas Reviewed for SCI Center (continued)	Findings	Recommendations
NA	The facility complied with any additional elements required by VHA, local policy, or other regulatory standards.		
	Areas Reviewed for Emergency Management		
	The facility had a documented Hazard Vulnerability Assessment and reviewed the assessment annually.		
	The facility maintained a list of resources and assets it may need during an emergency.		
	The facility had a written Emergency Operations Plan that addressed key components.		
	The facility had a written description of how it will respond to an influx of potentially infectious patients and a plan for managing them over an extended period of time.		
	Employees received training and competency assessment on use of emergency evacuation devices.		
	Evacuation devices were immediately accessible and in good repair.		
	The facility complied with any additional elements required by VHA, local policy, or other regulatory standards.		
	Areas Reviewed for Construction Safety		
NA	The facility met selected dust control, temporary barrier, storage, and security requirements for the construction site perimeter.		
NA	The facility complied with any additional elements required by VHA or local policy, or other regulatory standards.		

Medication Management

The purpose of this review was to determine whether the facility had established safe medication storage practices in accordance with VHA policy and Joint Commission standards.^c

We reviewed relevant documents, the training records of 20 nursing employees, and pharmacy monthly medication storage area inspection documentation for the past 6 months. Additionally, we inspected the Emergency Department, surgical intensive care unit, medicine/surgery unit, and community living center unit and for these areas reviewed documentation of narcotic wastage from automated dispensing machines and inspected crash carts containing emergency medications. The table below shows the areas reviewed for this topic. The areas marked as NM did not meet applicable requirements and needed improvement. Any items that did not apply to this facility are marked NA.

NM	Areas Reviewed	Findings	Recommendations
	Facility policy addressed medication receipt in patient care areas, storage procedures until administration, and staff authorized to have access to medications and areas used to store them.		
	The facility required two signatures on controlled substances partial dose wasting.		
	The facility defined those medications and supplies needed for emergencies and procedures for crash cart checks, checks included all required elements, and the facility conducted checks with the frequency required by local policy.		
	The facility prohibited storage of potassium chloride vials in patient care areas.		
NA	If the facility stocked heparin in concentrations of more than 5,000 units per milliliter in patient care areas, the Chief of Pharmacy approved it.		

NM	Areas Reviewed (continued)	Findings	Recommendations
X	The facility maintained a list of the look-alike and sound-alike medications it stores, dispenses, and administers; reviewed this list annually and ensured it was available for staff reference; and had labeling/storage processes to prevent errors.	<ul style="list-style-type: none"> The facility did not annually review the look-alike and sound-alike medication list. 	<p>5. We recommended that the facility annually review the look-alike and sound-alike medication list.</p>
	The facility identified in writing its high-alert and hazardous medications, ensured the high-alert list was available for staff reference, and had processes to manage these medications.		
	The facility conducted and documented inspections of all medication storage areas at least monthly, fully implemented corrective actions, and monitored the changes.		
X	The facility/Pharmacy Service had a written policy for safe use of automated dispensing machines that included oversight of overrides and employee training and minimum competency requirements for users, and employees received training or competency assessment in accordance with local policy.	<ul style="list-style-type: none"> The facility did not have a written policy for safe use of automated dispensing machines. 	<p>6. We recommended that the facility develop a written policy for the safe use of automated dispensing machines and implement the policy and that facility managers monitor compliance.</p>
	The facility employed practices to prevent wrong-route drug errors.		
	Medications prepared but not immediately administered contained labels with all required elements.		
	The facility removed medications awaiting destruction or stored them separately from medications available for administration.		
	The facility met multi-dose insulin pen requirements.		
	The facility complied with any additional elements required by VHA or local policy.		

Coordination of Care

The purpose of this review was to evaluate the consult management process and the completion of inpatient clinical consults.^d

We reviewed relevant documents, and we conversed with key employees. Additionally, we reviewed the EHRs of 42 randomly selected patients who had a consult requested during an acute care admission from January 1 through June 30, 2014. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement. Any items that did not apply to this facility are marked NA.

NM	Areas Reviewed	Findings	Recommendations
	A committee oversaw the facility's consult management processes.		
	Major bed services had designated employees to: <ul style="list-style-type: none"> • Provide training in the use of the computerized consult package • Review and manage consults 		
X	Consult requests met selected requirements: <ul style="list-style-type: none"> • Requestors included the reason for the consult. • Requestors selected the proper consult title. • Consultants appropriately changed consult statuses, linked responses to the requests, and completed consults within the specified timeframe. 	<ul style="list-style-type: none"> • Nine of 42 consult requests (21 percent) did not include "inpatient" in the title. • For five of the applicable 39 consults (13 percent), consultants did not link their responses to the requests. 	<p>7. We recommended that requestors consistently select the proper consult title and that facility managers monitor compliance.</p> <p>8. We recommended that consultants consistently link consult responses to the requests and that facility managers monitor compliance.</p>
	The facility met any additional elements required by VHA or local policy.		

CT Radiation Monitoring

The purpose of this review was to determine whether the facility complied with selected VHA radiation safety requirements and to follow up on recommendations regarding monitoring and documenting radiation dose from a 2011 report, *Healthcare Inspection – Radiation Safety in Veterans Health Administration Facilities*, Report No. 10-02178-120, March 10, 2011.^e

We reviewed relevant documents, including qualifications and dosimetry monitoring for 11 CT technologists and CT scanner inspection reports, and conversed with key managers and employees. We also reviewed the EHRs of 50 randomly selected patients who had a CT scan January 1–December 31, 2014. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement. Any items that did not apply to this facility are marked NA.

NM	Areas Reviewed	Findings	Recommendations
	The facility had a designated Radiation Safety Officer responsible for oversight of the radiation safety program.		
	The facility had a CT/imaging/radiation safety policy or procedure that included: <ul style="list-style-type: none"> • A CT quality control program with program monitoring by a medical physicist at least annually, image quality monitoring, and CT scanner maintenance • CT protocol monitoring to ensure doses were as low as reasonably achievable and a method for identifying and reporting excessive CT patient doses to the Radiation Safety Officer • A process for managing/reviewing CT protocols and procedures to follow when revising protocols • Radiologist review of appropriateness of CT orders and specification of protocol prior to scans 		
	A radiologist and technologist expert in CT reviewed all CT protocols revised during the past 12 months.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	A medical physicist tested a sample of CT protocols at least annually.		
	A medical physicist performed and documented CT scanner annual inspections, an initial inspection after acquisition, and follow-up inspections after repairs or modifications affecting dose or image quality prior to the scanner's return to clinical service.		
	If required by local policy, radiologists included patient radiation dose in the CT report available for clinician review and documented the dose in the required application(s), and any summary reports provided by teleradiology included dose information.		
	CT technologists had required certifications or written affirmation of competency if "grandfathered in" prior to January 1987, and technologists hired after July 1, 2014, had CT certification.		
	There was documented evidence that CT technologists had annual radiation safety training and dosimetry monitoring.		
X	If required by local policy, CT technologists had documented training on dose reduction/optimization techniques and safe procedures for operating the types of CT equipment they used.	Local CT technologist training policy reviewed: <ul style="list-style-type: none"> • Seven CT technologists did not have documented evidence of training on safe procedures for operating the types of CT equipment they use. 	9. We recommended that the Radiation Safety Officer ensure all computed tomography technologists have documented training on safe procedures for operating the types of computed tomography equipment they use.
	The facility complied with any additional elements required by VHA or local policy.		

ADs

The purpose of this review was to determine whether the facility complied with selected requirements for ADs for patients.^f

We reviewed relevant documents and conversed with key employees. Additionally, we reviewed the EHRs of 47 randomly selected patients who had an acute care admission January 1–December 31, 2014. The table below shows the areas reviewed for this topic. Any items that did not apply to this facility are marked NA. The facility generally met requirements. We made no recommendations.

NM	Areas Reviewed	Findings	Recommendations
	The facility had an AD policy that addressed: <ul style="list-style-type: none"> • AD notification, screening, and discussions • Proper use of AD note titles 		
	Employees screened inpatients to determine whether they had ADs and used appropriate note titles to document screening.		
	When patients provided copies of their current ADs, employees had scanned them into the EHR. <ul style="list-style-type: none"> • Employees correctly posted patients' AD status. 		
	Employees asked inpatients if they would like to discuss creating, changing, and/or revoking ADs. <ul style="list-style-type: none"> • When inpatients requested a discussion, employees documented the discussion and used the required AD note titles. 		
	The facility met any additional elements required by VHA or local policy.		

Surgical Complexity

The purpose of this review was to determine whether the facility provided selected support services appropriate to the assigned surgical complexity designation.⁹

We reviewed relevant documents and the training records of 20 employees, and we conversed with key managers and employees. The table below shows the areas reviewed for this topic. Any items that did not apply to this facility are marked NA. The facility generally met requirements. We made no recommendations.

NM	Areas Reviewed	Findings	Recommendations
	Facility policy defined appropriate availability for all support services required by VHA for the facility's surgical designation.		
	Employees providing selected tests and patient care after operational hours had appropriate competency assessments and validation.		
NA	The facility properly reported surgical procedures performed that were beyond the facility's surgical complexity designation. <ul style="list-style-type: none"> • The facility reviewed and implemented recommendations made by the VISN Chief Surgical Consultant. 		
	The facility complied with any additional elements required by VHA or local policy.		

EAM

The purpose of this review was to determine whether the facility complied with selected VHA out of operating room airway management requirements.^h

We reviewed relevant documents, including the EAM coverage schedule for 30 selected dates from January 1 through June 30, 2014, and we conversed with key managers and employees. The table below shows the areas reviewed for this topic. Any items that did not apply to this facility are marked NA. The facility generally met requirements. We made no recommendations.

NM	Areas Reviewed	Findings	Recommendations
	The facility had a local EAM policy or had a documented exemption.		
NA	If the facility had an exemption, it did not have employees privileged to perform procedures using moderate or deep sedation that might lead to airway compromise.		
	Facility policy designated a clinical subject matter expert, such as the Chief of Staff or Chief of Anesthesia, to oversee EAM.		
	Facility policy addressed key VHA requirements, including: <ul style="list-style-type: none"> • Competency assessment and reassessment processes • Use of equipment to confirm proper placement of breathing tubes • A plan for managing a difficult airway 		
	Initial competency assessment for EAM included: <ul style="list-style-type: none"> • Subject matter content elements and completion of a written test • Successful demonstration of procedural skills on airway simulators or mannequins • Successful demonstration of procedural skills on patients 		

NM	Areas Reviewed (continued)	Findings	Recommendations
	<p>Reassessments for continued EAM competency were completed at the time of renewal of privileges or scope of practice and included:</p> <ul style="list-style-type: none"> • Review of clinician-specific EAM data • Subject matter content elements and completion of a written test • Successful demonstration of procedural skills on airway simulators or mannequins • At least one occurrence of successful airway management and intubation in the preceding 2 years, written certification of competency by the supervisor, or successful demonstration of skills to the subject matter expert • A statement related to EAM if the clinician was not a licensed independent practitioner 		
	<p>The facility had a clinician with EAM privileges or scope of practice or an anesthesiology staff member available during all hours the facility provided patient care.</p>		
	<p>Video equipment to confirm proper placement of breathing tubes was available for immediate clinician use.</p>		
	<p>The facility complied with any additional elements required by VHA or local policy.</p>		

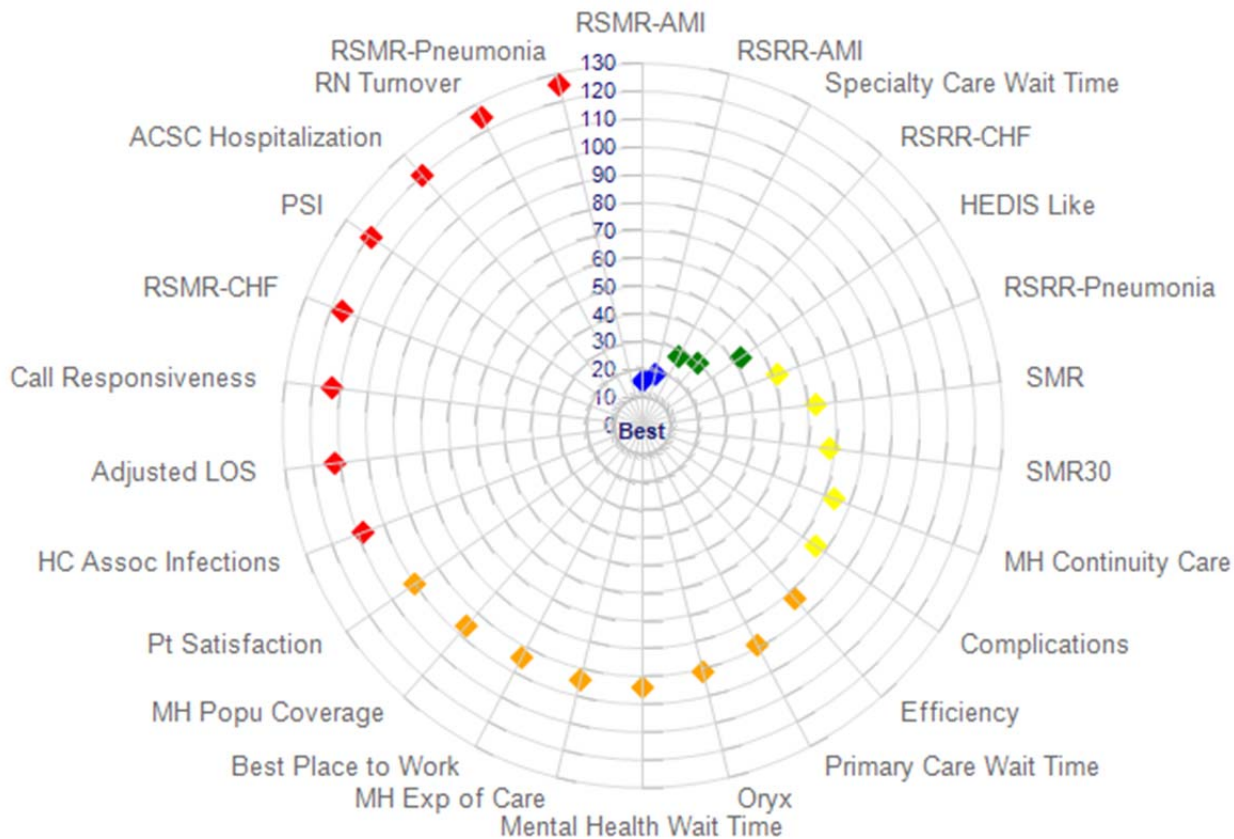
Facility Profile (Oklahoma City/635) FY 2015¹	
Type of Organization	Tertiary
Complexity Level	1a-High complexity
Affiliated/Non-Affiliated	Affiliated
Total Medical Care Budget in Millions as of August 2015	\$455.3
Number of:	
• Unique Patients	60,198
• Outpatient Visits	561,150
• Unique Employees²	1,976
Type and Number of Operating Beds:	
• Hospital	139
• Community Living Center	33
• MH	25
Average Daily Census:	
• Hospital	97
• Community Living Center	23
• MH	20
Number of Community Based Outpatient Clinics	8
Location(s)/Station Number(s)	Lawton/635GA Wichita Falls/635GB Blackwell/635GC Ada/635GD Stillwater/635GE Altus/635GF Enid/635GG Ardmore/635HB
VISN Number	19

¹ All data is for FY 2015 except where noted.

² Unique employees involved in direct medical care (cost center 8200).

Strategic Analytics for Improvement and Learning (SAIL)³

Oklahoma City VAMC - 1-Star in Quality (FY2015Q2) (Metric)

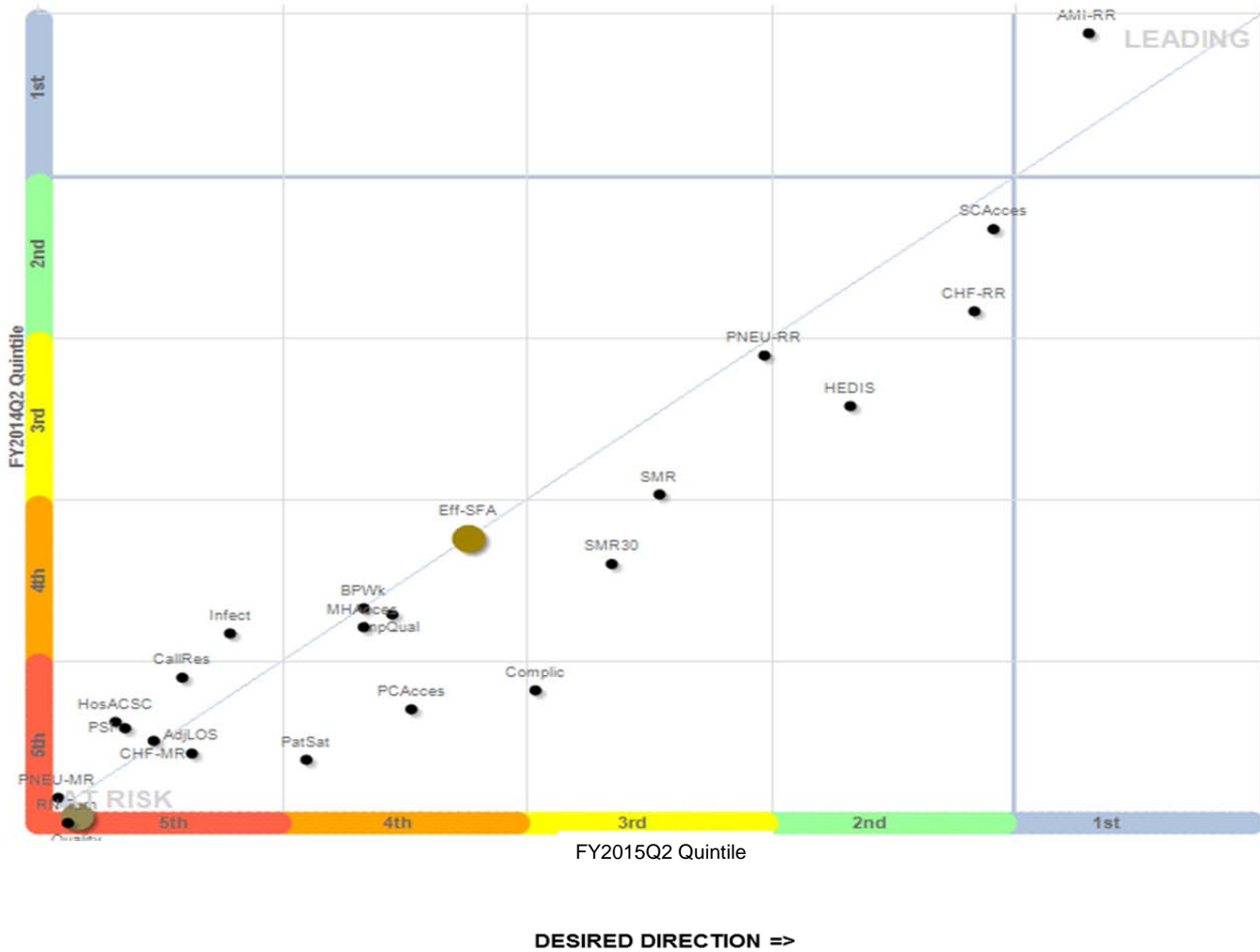


Marker color: Blue - 1st quintile; Green - 2nd; Yellow - 3rd; Orange - 4th; Red - 5th quintile.

³ Metric definitions follow the graphs.

Scatter Chart

FY2015Q2 Change in Quintiles from FY2014Q2



NOTE

Quintiles are derived from facility ranking on z-score of a metric among 128 facilities. Lower quintile is more favorable.

Metric Definitions

Measure	Definition	Desired direction
ACSC Hospitalization	Ambulatory care sensitive condition hospitalizations (observed to expected ratio)	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
Best Place to Work	Overall satisfaction with job	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
Complications	Acute care risk adjusted complication ratio	A lower value is better than a higher value
Efficiency	Overall efficiency measured as 1 divided by SFA (Stochastic Frontier Analysis)	A higher value is better than a lower value
Employee Satisfaction	Overall satisfaction with job	A higher value is better than a lower value
HC Assoc Infections	Health care associated infections	A lower value is better than a higher value
HEDIS	Outpatient performance measure (HEDIS)	A higher value is better than a lower value
MH Wait Time	MH wait time for new and established patients (top 50 clinics; FY13 and later)	A higher value is better than a lower value
MH Continuity Care	MH continuity of care (FY14Q3 and later)	MH Continuity Care
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
Primary Care Wait Time	Primary care wait time for new and established patients (top 50 clinics; FY13 and later)	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
Pt Satisfaction	Overall rating of hospital stay (inpatient only)	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-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-CHF	30-day risk standardized readmission rate for congestive heart failure	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
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 and established patients (top 50 clinics; FY13 and later)	A higher value is better than a lower value

VISN Director Comments

**Department of
Veterans Affairs**

Memorandum

Date: November 19, 2015

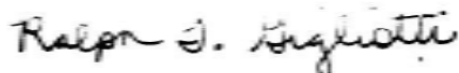
From: Director, Rocky Mountain Network (10N19)

Subject: **CAP Review of the Oklahoma City VA Health Care System,
Oklahoma City, OK**

To: Director, San Diego Office of Healthcare Inspections (54SD)

Director, Management Review Service (VHA 10AR MRS OIG CAP
CBOC)

1. I have reviewed the response from the Oklahoma City VA Health Care System and concur with the response.
2. If you have any questions or concerns, please contact Susan Curtis, VISN 19, HSS, 303-639-6995.



Ralph T. Gigliotti, FACHE
Director, VA Rocky Mountain Network

Acting Facility Director Comments

**Department of
Veterans Affairs**

Memorandum

Date: November 16, 2015

From: Acting Director, Oklahoma City VA Health Care System (635/00)

Subject: **CAP Review of the Oklahoma City VA Health Care System,
Oklahoma City, OK**

To: Director, Rocky Mountain Network (10N19)

1. We appreciate the opportunity to work with the Office of Inspector General as we continuously strive to improve the quality of healthcare for America's Veterans.
2. I concur with the findings and recommendations of the OIG CAP Survey Team. The importance of this review is acknowledged as we continually strive to provide the best possible care.
3. If you have any questions, please contact Adrienne Riesenbeck, Director, Office of Quality, Safety, and Value, Oklahoma City VA Health Care System, at 405-456-3146.



Gerald K. Darnell, Psy.D.
Acting Medical Center Director

Comments to OIG's Report

The following Director's comments are submitted in response to the recommendations in the OIG report:

OIG Recommendations

Recommendation 1. We recommended that facility managers ensure that credentialing and privileging folders do not contain non-allowed information.

Concur

Target date for completion: Complete

Facility response: Staff were re-educated on what is appropriate to keep in the credentialing and privileging folders. Credentialing and Privileging staff conducted a 100% review of all credentialing and privileging folders to ensure folders do not contain non-allowed information.

Recommendation 2. We recommended that facility managers ensure patient care areas are clean and bathrooms are free from offensive odors and monitor compliance.

Concur

Target date for completion: Complete

Facility response: Environmental Management Services (EMS) Supervisors and Work Leaders complete daily Quality Assurance checks to ensure all cleaning requirements are met. The quality assurance checks are submitted to the Environmental Care Specialist for review and follow-up. EMS Supervisors and work leaders are required to perform daily checks of the assigned areas, with public restrooms being checked three times a day. Environment of Care rounds are completed weekly for designated areas of the hospital and CBOCs to identify and address cleanliness concerns.

Recommendation 3. We recommended that facility managers initiate corrective actions to repair the ceiling leak in the operating room supply area.

Concur

Target date for completion: November 22, 2015

Facility response: An emergency construction contract was awarded to replace the roof where leaks are occurring. Materials have been received and the roof replacement is scheduled for completion by November 22, 2015. In order to prevent ceiling leaks prior to roof replacement, temporary barriers were put in place and the subcontractor provided remediation on September 14, 2015. The subcontractor removed and replaced all wet ceiling tiles, wiped down each surface above the ceiling with a bleach solution, and patched the area of the roof that was the source of the leak. The area was

re-surveyed on September 16, 2015 and found to be dry. The room will remain closed and barriers in place until a new roof is installed. The room was re-surveyed October 30, 2015 and November 2, 2015, following rain and the room was found to be dry on both occasions.

Recommendation 4. We recommended that employees secure sensitive patient information at all times and that facility managers monitor compliance.

Concur

Target date for completion: Complete

Facility response: The Privacy Officer provided training to employees on the importance of leaving screen protectors in place and on proper positioning of monitors to ensure personally identifiable information is not viewable in public areas. The Privacy Officer conducts weekly rounds of designated areas of the hospital and CBOCs to identify and address privacy concerns as part of the Environment of Care team.

Recommendation 5. We recommended that the facility annually review the look-alike and sound-alike medication list.

Concur

Target date for completion: Complete

Facility response: The medical center reviews the look-alike sound-alike medication list annually along with the high risk medication list and documents the review in the Pharmacy and Therapeutics (P&T) Committee minutes. However, prior to the OIG CAP review, the minutes did not clearly state the look-alike sound-alike medication list was reviewed with the high-risk list. The look-alike sound-alike and high-risk lists were reviewed and updated as necessary during the October 2015, P&T Committee meeting. The P&T Committee chair will ensure the meeting minutes are clear and accurately reflect the review of both the look-alike sound-alike and high-risk lists at a minimum of annually.

Recommendation 6. We recommended that the facility develop a written policy for the safe use of automated dispensing machines and implement the policy and that facility managers monitor compliance.

Concur

Target date for completion: Complete

Facility response: Oklahoma City VA Health Care System's policy, "Automated Dispensing Machine Training Requirements" was updated to include all required elements.

Recommendation 7. We recommended that requestors consistently select the proper consult title and that facility managers monitor compliance.

Concur

Target date for completion: Complete

Facility response: Deputy Chief of Staff conducted a 100% review of consult titles, and consult titles were updated to include the word "inpatient" or "outpatient" as required to be in compliance with the Consult Management Business Rules.

Recommendation 8. We recommended that consultants consistently link consult responses to the requests and that facility managers monitor compliance.

Concur

Target date for completion: February 29, 2016

Facility response: During the OIG review, the consult responses not linked to the consult were EKGs. The Oklahoma City VA HCS is in the process of updating the Cardiology software package to allow EKG responses to link to the consult per Consult Management Business Rules. The subcontractors are working closely with OKC VA HCS and expect to have the HL7 interface updated by February 29, 2016.

Recommendation 9. We recommended that the Radiation Safety Officer ensure all computed tomography technologists have documented training on safe procedures for operating the types of computed tomography equipment they use.

Concur

Target date for completion: Complete

Facility response: Following the OIG CAP review, all computed tomography technologists were fully trained on all computed tomography equipment. The training and competency was documented for each computed tomography technologist. The technologists that were not fully trained at the time of the OIG visit were not using the equipment without supervision from a fully trained technologist. Competency requirements for the computed tomography equipment were added to the annual competency form for all computed tomography technologists.

Office of Inspector General Contact and Staff Acknowledgments

Contact	For more information about this report, please contact the OIG at (202) 461-4720.
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Markwayne Mullin, Steve Russell, Mac Thornberry

This report is available at www.va.gov/oig.

Endnotes

^a References used for this topic included:

- VHA Directive 1026, *VHA Enterprise Framework for Quality, Safety, and Value*, August 2, 2013.
- VHA Handbook 1050.01, *VHA National Patient Safety Improvement Handbook*, March 4, 2011.
- VHA Directive 2010-025, *Peer Review for Quality Management*, June 3, 2010.
- VHA Directive 2010-032, *Safe Patient Handling Program and Facility Design*, June 28, 2010.
- VHA Directive 1036, *Standards for Observation in VA Medical Facilities*, February 6, 2014.
- VHA Handbook 1100.19, *Credentialing and Privileging*, October 15, 2012.
- VHA Handbook 1102.01, *National Surgery Office*, January 30, 2013.
- VHA Directive 2008-063, *Oversight and Monitoring of Cardiopulmonary Resuscitative Events and Facility Cardiopulmonary Resuscitation Committees*, October 17, 2008.

VHA Handbook 1907.01, *Health Information Management and Health Records*, July 22, 2014.

^b References used for this topic included:

- VHA Directive 2008-052, *Smoke-Free Policy for VA Health Care Facilities*, August 26, 2008.
- VHA Directive 2010-032, *Safe Patient Handling Program and Facility Design*, June 28, 2010.
- VHA Directive 2011-007, *Required Hand Hygiene Practices*, February 16, 2011.
- VA National Center for Patient Safety, “Issues continue to occur due to improper ceiling mounted patient lift installation, maintenance and inspection,” Addendum to Patient Safety Alert 14-07, September 3, 2014.
- Various requirements of The Joint Commission, the Occupational Safety and Health Administration, the International Association of Healthcare Central Service Materiel Management, the Health Insurance Portability and Accountability Act, Underwriters Laboratories, VA Master Specifications.

^c References used for this topic included:

- VHA Directive 2008-027, *The Availability of Potassium Chloride for Injection Concentrate USP*, May 13, 2008.
- VHA Directive 2010-020, *Anticoagulation Therapy Management*, May 14, 2010.
- VHA Handbook 1108.01, *Controlled Substances (Pharmacy Stock)*, November 16, 2010.
- VHA Handbook 1108.05, *Outpatient Pharmacy Services*, May 30, 2006.
- VHA Handbook 1108.06, *Inpatient Pharmacy Services*, June 27, 2006.
- VHA Handbook 1108.07, *Pharmacy General Requirements*, April 17, 2008.
- Various requirements of The Joint Commission.

^d The reference used for this topic was:

- Under Secretary for Health, “Consult Business Rule Implementation,” memorandum, May 23, 2013.

^e References used for this topic included:

- VHA Directive 1129, *Radiation Protection for Machine Sources of Ionizing Radiation*, February 5, 2015.
- VHA Handbook 1105.02, *Nuclear Medicine and Radiation Safety Service*, December 10, 2010.
- VHA Handbook 5005/77, *Staffing*, Part II, Appendix G25, Diagnostic Radiologic Technologist Qualifications Standard GS-647, June 26, 2014.
- The Joint Commission, “Radiation risks of diagnostic imaging,” Sentinel Event Alert, Issue 47, August 24, 2011.
- VA Radiology, “Online Guide,” updated October 4, 2011.
- The American College of Radiology, “ACR–AAPM TECHNICAL STANDARD FOR DIAGNOSTIC MEDICAL PHYSICS PERFORMANCE MONITORING OF COMPUTED TOMOGRAPHY (CT) EQUIPMENT,” Revised 2012.

^f The references used for this topic included:

- VHA Handbook 1004.02, *Advance Care Planning and Management of Advance Directives*, December 24, 2013.
- VHA Handbook 1907.01, *Health Information Management and Health Records*, July 22, 2014.

^g References used for this topic included:

- VHA Directive 2009-001, *Restructuring of VHA Clinical Programs*, January 5, 2009.
- VHA Directive 2010-018, *Facility Infrastructure Requirements to Perform Standard, Intermediate, or Complex Surgical Procedures*, May 6, 2010.

^h References used for this topic included:

- VHA Directive 2012-032, *Out of Operating Room Airway Management*, October 26, 2012.
- VHA Handbook 1101.04, *Medical Officer of the Day*, August 30, 2010.