

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

# Office of Healthcare Inspections

Report No. 16-00013-242

# Review of Community Based Outpatient Clinics and Other Outpatient Clinics of Kansas City VA Medical Center, Kansas City, Missouri

**April 14, 2016** 

To Report Suspected Wrongdoing in VA Programs and Operations

Telephone: 1-800-488-8244 E-Mail: vaoighotline@va.gov

(Hotline Information: <a href="https://www.va.gov/oig/hotline">www.va.gov/oig/hotline</a>)

# Glossary

CBOC community based outpatient clinic

EHR electronic health record EOC environment of care

FY fiscal year

HT home telehealth

lab laboratory

NA not applicable

NM not met

OIG Office of Inspector General

OOC other outpatient clinic

PC primary care

PTSD post-traumatic stress disorder
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 patient care activities to determine whether the Community Based Outpatient Clinics and other outpatient clinics under the oversight of the Kansas City VA Medical Center and Veterans Integrated Service Network 15 provide safe, consistent, and high-quality health care. The review evaluated the clinics' compliance with selected requirements for home telehealth enrollment, outpatient lab results management, and post-traumatic stress disorder care. We also randomly selected the Cameron VA Clinic, Cameron, MO, as a representative site and evaluated the environment of care on February 2, 2016.

**Review Results:** We conducted four focused reviews and had no findings for the Post-Traumatic Stress Disorder Care review. However, we made recommendations for improvement in the following three review areas:

**Environment of Care**: Ensure that at the Cameron VA Clinic:

- Signs identify the location of fire extinguishers that are in large rooms or are obscured from view.
- The hazardous materials inventory is reviewed twice within a 12-month period.
- A privacy sign is available for use when a telehealth visit is in progress.
- Patient-identifiable information on laboratory specimens is protected during transport to the parent facility.

# Home Telehealth Enrollment. Ensure that:

- Providers sign Home Telehealth assessments and treatment plans.
- Clinicians document the Home Telehealth enrollment process prior to the entry of monthly monitoring notes.

#### Outpatient Lab Results Management. Ensure that:

 Clinicians notify patients of their laboratory results within 14 days as required by Veterans Health Administration.

#### **Comments**

The Veterans Integrated Service Network and Facility Directors agreed with the Community Based Outpatient Clinic and other outpatient clinic review findings and recommendations and provided acceptable improvement plans. (See Appendixes C and D, pages 16–19, for the full text of the Directors' comments.) We consider recommendations 3 and 4 closed. We will follow up on the planned actions for the open recommendations until they are completed.

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

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# **Objectives, Scope, and Methodology**

# **Objectives**

The CBOC and OOC reviews are an element of the OIG's efforts to ensure that our Nation's veterans receive high-quality VA health care services. As such, the CBOC and OOC reviews are recurring evaluations of selected outpatient care activities that focus on patient care quality and the EOC. In general, our objectives are to determine whether:

- The selected CBOC is compliant with EOC requirements.
- The CBOCs/OOCs are compliant with selected VHA documentation requirements for the enrollment, assessment, and monitoring of HT patients.
- The CBOCs/OOCs are compliant with VHA requirements for the patient notification and follow up of selected outpatient lab results.
- The CBOCs/OOCs are compliant with selected VHA requirements related to PTSD screening, diagnostic evaluation, and treatment.

# Scope

To evaluate for compliance with requirements related to patient care quality and the EOC, we conducted an onsite inspection, reviewed clinical and administrative records, and discussed processes and validated findings with managers and employees. The review covered the following four activities:

- EOC
- HT Enrollment
- Outpatient Lab Results Management
- PTSD Care

The scope of this review is limited to the established objectives. Issues and concerns that come to our attention but are outside the scope of this standardized inspection will be reviewed and referred accordingly.

# Methodology

The onsite EOC inspection was conducted at a randomly selected outpatient site of care that had not been previously inspected.<sup>1</sup> Details of the targeted study populations for the HT Enrollment, Outpatient Lab Results Management, and PTSD Care focused reviews are noted in Table 1.

Table 1. CBOC/OOC Focused Reviews and Study Populations

Review Topic	Study Population
HT Enrollment	All CBOC and OOC patients screened within the study period
	of July 1, 2014, through June 30, 2015, who have had at least
	one "683" Monthly Monitoring Note and did not have Monthly
	Monitoring Notes documented before July 1, 2014.
Outpatient Lab	All patients who had outpatient (excluding emergency
Results	department, urgent care, or same day surgery orders)
Management	potassium and sodium serum lab test results during January 1
	through December 31, 2014.
PTSD Care	All patients who had a positive PTSD screen at the parent
	facility's outpatient clinics during July 1, 2014, through June 30,
	2015.

In this report, we make recommendations for improvement. Recommendations pertain to issues that are significant enough to be monitored by the OIG until corrective actions are implemented.

The review was performed in accordance with OIG standard operating procedures for CBOC and OOC reviews.

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<sup>&</sup>lt;sup>1</sup> Each outpatient site selected for physical inspection was randomized from all PC CBOCs, multi-specialty CBOCs, and health care centers reporting to the parent facility and was operational and classified as such in VA's Site Tracking Database by August 15, 2015.

# **Results and Recommendations**

## **EOC**

The purpose of this review was to assess whether CBOC managers have established and maintained a safe and clean EOC as required.<sup>a</sup>

We reviewed relevant documents and conducted a physical inspection of the Cameron VA Clinic. 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.

Table 2. EOC

NM	Areas Reviewed	Findings	Recommendations				
Docu	Document and Training Review						
	Managers monitored clinic staff's hand						
	hygiene compliance.						
	Clinic managers provided training for						
	employees on the Exposure Control Plan						
	for Bloodborne Pathogens within the past						
	12 months for those newly hired and						
	annually for others.						
	The clinic had a policy/procedure for life						
	safety elements.						
	The clinic had a policy for the management						
	of clinical emergencies.						
	The clinic had a policy for the management						
	of mental health emergencies.						
	The clinic had a documented Hazard						
	Vulnerability Assessment to identify						
	potential emergencies.						
	The Hazard Vulnerability Assessment was						
	reviewed annually.						
	The clinic had a policy that requires staff to						
	receive regular information on their						
	responsibilities in emergency response						
	operations.						

NM	Areas Reviewed (continued)	Findings	Recommendations
	Clinic staff participated in regular		
	emergency management training and		
	exercises.		
	The clinic conducted fire drills at least once		
	every 12 months for the past 24 months		
	with documented critiques of the drills.		
	The clinic had a policy/procedure for the		
	identification of individuals entering the		
	clinic.		
	The clinic had a Workplace Behavioral		
	Risk Assessment in place.		
NA	The alarm system or panic buttons in high-		
	risk areas was/were tested during the past		
	12 months.		
	The clinic had written procedures to follow		
	in the event of a security incident.		
	Clinic employees received training on the		
	new chemical label elements and safety		
	data sheet format.		
	The clinic had a policy/procedure for the		
	cleaning and disinfection of telehealth		
Dhyra	equipment.		
Pnys	ical Inspection		
	The clinic was clean.		
	The furnishings and equipment were safe		
	and in good repair.		
	Hand hygiene facilities and product		
	dispensers were working and readily		
	accessible to employees.		
	Personal protective equipment was		
	available.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	Sharps containers were closable, easily	-	
	accessible, and not overfilled.		
	Clinic staff did not store food and drinks in		
	refrigerators or freezers or on countertops		
	or other areas where there is blood or		
	other potentially infectious materials.		
	Sterile commercial supplies were not		
	expired.		
	The clinic minimized the risk of infection		
	when storing and disposing of medical		
	waste.		
	The clinic had unobstructed access to fire		
	alarms/pull stations.		
	The clinic had unobstructed access to fire		
	extinguishers.		
X	For fire extinguishers located in large	The Cameron VA Clinic did not have signs	1. We recommended that the Facility
	rooms or are obscured from view, the clinic	to identify the location of fire extinguishers	Director ensures that signs identify the
	identified the locations of the fire	that are located in large rooms or are	location of fire extinguishers that are in
	extinguishers with signs.	obscured from view.	large rooms or are obscured from view at the Cameron VA Clinic.
	The suit since were visible from success		the Cameron VA Clinic.
	The exit signs were visible from every		
	direction.		
	Exit routes from the building were		
	unobstructed.		
	Staff wore VA-issued identification badges.  The clinic controlled access to and from		
NIA	areas identified as security sensitive.		
NA	The clinic had an alarm system or panic buttons installed in high-risk areas.		
X	U	The Cameron VA Clinic's inventory of	2. We recommended that the clinic
_ ^	The clinic's inventory of hazardous materials was reviewed for accuracy twice	hazardous materials and waste was not	manager reviews the Cameron VA Clinic's
	within the prior 12 months.	reviewed for accuracy twice within the prior	hazardous materials inventory twice within
	within the prior 12 months.	12 months.	a 12-month period.
	The clinic's safety data sheets for	12 monus.	a 12-monut penou.
	chemicals were readily available for the		
	staff.		
	otan.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	The clinic provided visual and auditory		
	privacy for veterans at check-in.		
	The clinic provided visual and auditory		
	privacy for patients in the interview areas.		
	Examination room doors were equipped		
	with either an electronic or manual lock.		
X	A privacy sign was available for use to indicate that a telehealth visit was in progress.	The Cameron VA Clinic did not use a privacy sign consistently to indicate that a telehealth visit was in progress.	<b>3.</b> We recommended that the Cameron VA Clinic manager ensures that a privacy sign is available for use when a telehealth visit is in progress.
	Documents containing patient-identifiable information were not visible or unsecured.		
	Clinic staff locked computer screens when they were not in use.		
	Information was not viewable on monitors in public areas.		
	Window coverings, if present, provided privacy.		
X	Clinic staff protected patient-identifiable	Clinic staff did not protect patient-	4. We recommended that clinic staff
	information to maintain patient privacy on laboratory specimens during transport.	identifiable information on laboratory specimens during transport from the Cameron VA Clinic to the parent facility.	protect patient-identifiable information on laboratory specimens during transport.
	The clinic had examination room(s) for		
	women veterans which were located in a		
	space where they did not open into a		
	public waiting room or a high-traffic public corridor.		
	The clinic provided adequate privacy for		
	women veterans in the examination rooms.		
	The clinic provided feminine hygiene		
	products in examination rooms where		
	pelvic examinations were performed or in		
	bathrooms within close proximity.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	Women's public restrooms had feminine		
	hygiene products and disposal bins		
	available for use.		
	Multi-dose medication vials were not		
	expired.		
	All medications were secured from		
	unauthorized access.		
	The information technology network		
	room/server closet was secured/locked.		
	Access to the information technology		
	network room/server closet was restricted		
	to personnel authorized by Office of		
	Information and Technology, as evidenced		
	by a list of authorized individuals.		
	Access to the information technology		
	network room/server closet was		
	documented, as evidenced by the		
	presence of a sign-in/sign-out log.		

## **HT Enrollment**

The purpose of this review was to determine whether the facility's CBOCs and OOCs are compliant with selected VHA documentation requirements for the enrollment, assessment, and monitoring of HT patients.<sup>b</sup>

We reviewed relevant documents and 50 EHRs. We also validated findings with key managers and staff. The table below shows the areas reviewed for this topic. The areas marked as NM did not meet applicable requirements and needed improvement.

Table 3. HT Enrollment

NM	Areas Reviewed	Findings	Recommendations
	Clinicians entered a consult for HT		
	services.		
	Clinicians completed the HT enrollment		
	requests or "consults."		
	Clinicians documented contact with the		
	patient to evaluate suitability for HT		
	services.		
	Clinicians documented the patient or		
	caregiver's verbal informed consent for HT		
	services.		
	Clinicians documented assessments and		
	treatment plans for HT patients.		
X	Providers signed HT assessments and	Providers did not sign 12 of 50 patients'	<b>5</b> . We recommended that providers sign
	treatment plans.	HT assessments and treatment plans	Home Telehealth assessments and
		(24 percent).	treatment plans.
	Monthly monitoring notes were		
	documented for each month of HT		
	program participation.		
X	Documentation of HT enrollment (consult,	Clinicians did not document the enrollment	6. We recommended that clinicians
	screening, and/or initial assessment notes)	process prior to the entry of monthly	document the Home Telehealth enrollment
	was completed prior to the entry of	monitoring notes in 7 of 50 EHRs	process prior to the entry of monthly
	monthly monitoring notes.	(14 percent).	monitoring notes.

# **Outpatient Lab Results Management**

The purpose of this review was to determine whether CBOCs/OOCs are compliant with VHA requirements for the patient notification and follow up of selected outpatient lab results.<sup>c</sup>

We reviewed relevant documents and 49 EHRs. We also validated findings with key managers and staff. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement.

**Table 4. Outpatient Lab Results Management** 

NM	Areas Reviewed	Finding	Recommendation
	The facility has a written policy regarding communication of lab results from diagnostic practitioner to ordering practitioner.		
	The facility has a written policy for the communication of lab results that included all required elements.		
X	Clinicians notified patients of their lab results.	Clinicians did not consistently notify 18 of 49 patients (37 percent) of their lab results within the timeframe set by local policy or within 14 days as required by VHA.	7. We recommended that clinicians consistently notify patients of their laboratory results within 14 days as required by VHA.
	Clinicians documented in the EHR all attempts to communicate with the patients regarding their lab results.		
	Clinicians provided interventions for clinically significant abnormal lab results.		

## **PTSD Care**

The purpose of this review was to assess whether CBOCs/OOCs are compliant with selected VHA requirements for PTSD follow up in the outpatient setting.<sup>d</sup>

We reviewed relevant documents and 47 EHRs. We also validated findings with key managers and staff. The table below shows the areas reviewed for this topic. The facility generally met requirements. We made no recommendations.

Table 5. PTSD Care

NM	Areas Reviewed	Findings	Recommendations
	Each patient with a positive PTSD screen		
	received a suicide risk assessment.		
	Suicide risk assessments for patients with positive PTSD screens are completed by		
	acceptable providers.		
	Acceptable providers established plans of		
	care and disposition for patients with		
	positive PTSD screens.		
	Acceptable providers offered further		
	diagnostic evaluations to patients with		
	positive PTSD screens.		
	Providers completed diagnostic		
	evaluations for patients with positive PTSD		
	screens.		
	Patients, when applicable, received mental		
	health treatment.		

# **Clinic Profiles**

This review evaluates the quality of care provided to veterans at all of the outpatient clinics under the parent facility's oversight. In addition to PC integrated with women's health, MH, and tele-health services, the CBOCs provide various specialty care and ancillary services. The following table provides information relative to each of the outpatient clinics and lists the services provided at each location. The following table provides information relative to each of the outpatient clinics and lists the services provided at each location.

		Out	patient Wor Encounter			Services Provided <sup>5</sup>		
Location	Station #	Rurality	Outpatient Classification <sup>6</sup>	PC	МН	Specialty Clinics <sup>7</sup>	Specialty Care <sup>8</sup>	Ancillary Services <sup>9</sup>
Warrensburg, MO	589G1	Rural	Primary Care CBOC	4,853	1,770	1,486	Optometry	Audiology Diabetic Retinal Screening MOVE! Program <sup>10</sup> Pharmacy
Belton, MO	589GB	Urban	Primary Care CBOC	4,112	344	9	NA	Diabetic Retinal Screening
Paola, KS	589GC	Rural	Primary Care CBOC	2,929	1,136	2	NA	NA
Nevada, MO	589GD	Rural	Primary Care CBOC	4,967	1,960	16	NA	Diabetic Retinal Screening MOVE! Program
Cameron, MO	589GZ	Rural	Other Outpatient Services	2,084	218	4	NA	Diabetic Retinal Screening
Excelsior Springs, MO	589JB	Rural	Primary Care CBOC	3,589	1,010	4	NA	Home Based Primary Care MOVE! Program

<sup>&</sup>lt;sup>2</sup> Includes all CBOCs in operation before August 15, 2015. We have omitted 589JF (Kansas City) and 589QA (Overland Park), as no workload/encounters or services were reported.

<sup>&</sup>lt;sup>3</sup> http://vssc.med.va.gov/

<sup>&</sup>lt;sup>4</sup> An encounter is a professional contact between a patient and a practitioner vested with responsibility for diagnosing, evaluating, and treating the patient's condition. Encounters occur in both the outpatient and inpatient setting.

<sup>&</sup>lt;sup>5</sup> The denoted Specialty Care and Ancillary Services are limited to Primary Clinic Stops with a count ≥ 100 encounters during the October 1, 2014, through September 30, 2015, timeframe at the specified CBOC.

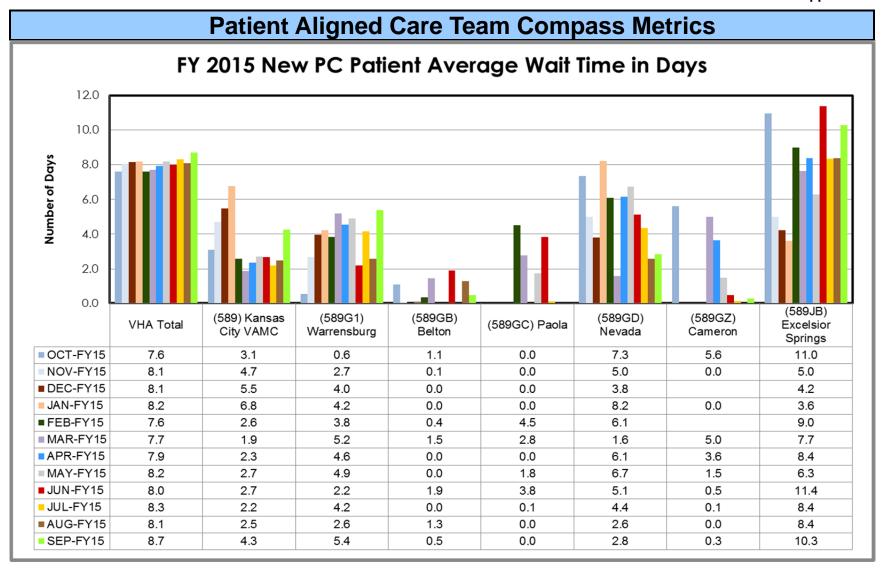
<sup>&</sup>lt;sup>6</sup> VHA Handbook 1006.02, VHA Site Classifications and Definitions, December 30, 2013.

<sup>&</sup>lt;sup>7</sup> The total number of encounters for the services provided in the "Specialty Care" column.

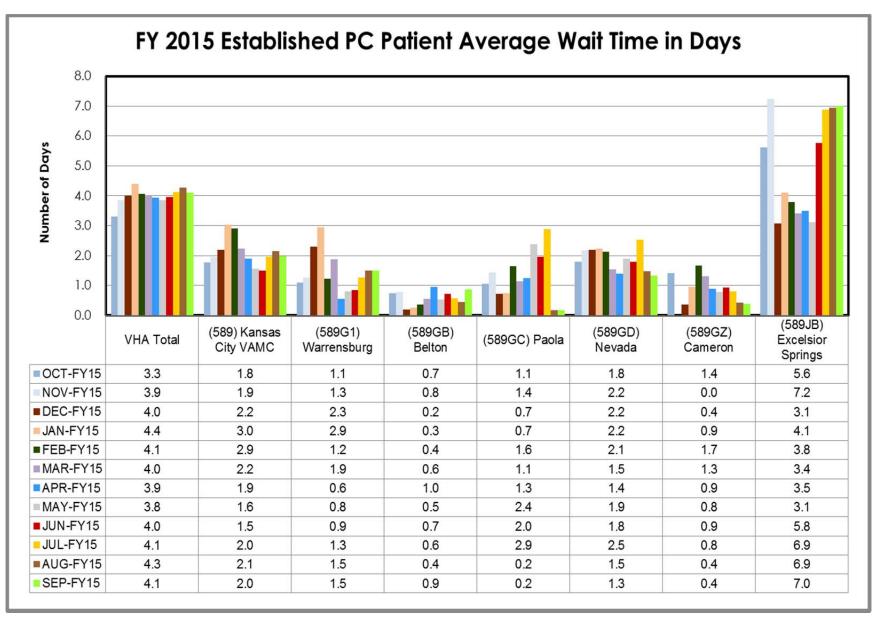
<sup>&</sup>lt;sup>8</sup> Specialty Care Services refer to non-Primary Care and non-Mental Health services provided by a physician.

<sup>&</sup>lt;sup>9</sup> Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.

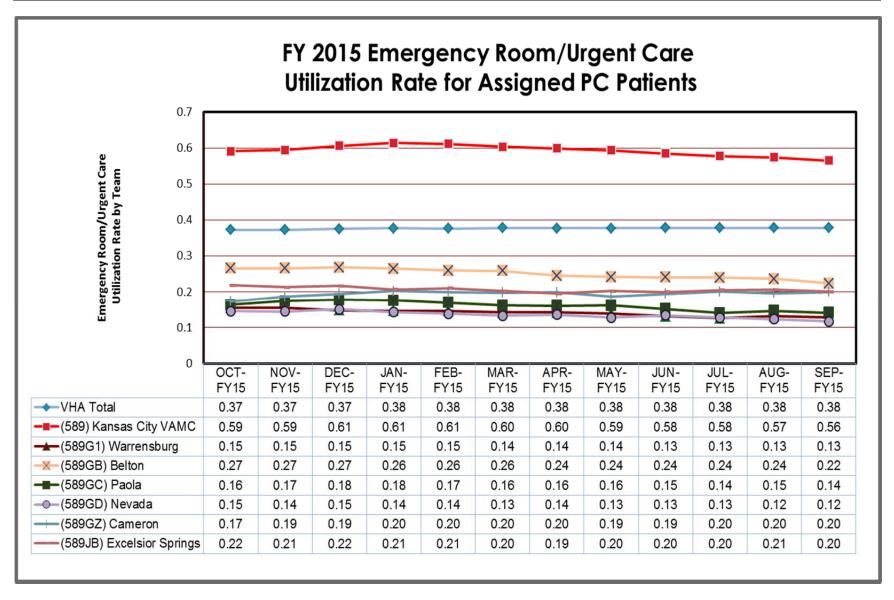
<sup>&</sup>lt;sup>10</sup> VHA Handbook 1120.01, MOVE! Weight Management Program for Veterans, March 31, 2011.



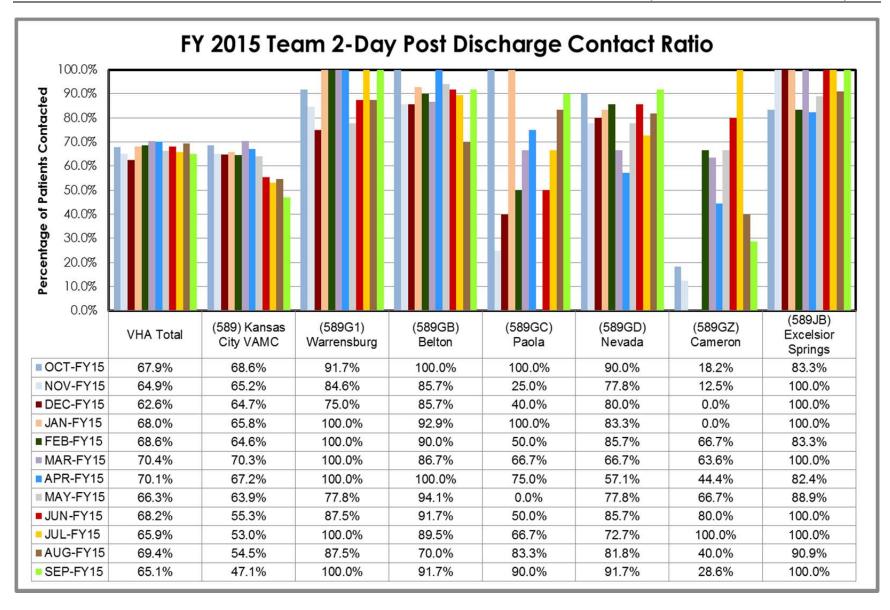
**Data Definition.** The average number of calendar days between a New Patient's PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic Appointment, Completed Appointment) from the completed appointment date. *Note that prior to FY15, this metric was calculated using the earliest possible create date.* Blank cells indicate the absence of reported data.



**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.



**Data Definition.** The total Emergency Room/Urgent Care encounters for assigned PC patients in the last 12 months divided by the Team Assignments. VHA Emergency Room/Urgent Care encounters are defined as encounters with a Primary Stop Code of 130 or 131 in either the primary or secondary position, excluding encounters with a Secondary Stop Code of 107, 115, 152, 311, 333, 334, 999, 474, 103, 430, 328, 321, 329, or 435 and the encounter was with a licensed independent practitioner (MD, DO, RNP PA).



**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.

# **Veterans Integrated Service Network Director Comments**

# **Department of Veterans Affairs**

# **Memorandum**

**Date:** March 21, 2016

From: Director, VA Heartland Network (10N15)

Subject: Review of CBOCs and OOCs of Kansas City VA Medical Center,

**Kansas City, MO** 

**To:** Director, Baltimore Office of Healthcare Inspections (54BA)

Director, Management Review Service (VHA 10E1D MRS OIG CAP

CBOC)

Attached, please find response for the Review of CBOC and OOCs of Kansas City VA Medical Center, Kansas City, MO.

I have reviewed and concur with the Medical Center Director's response. Thank you for this opportunity of review focused toward continuous performance improvement.

For additional questions please feel free to contact Mary O'Shea, VISN 15 Quality Management Officer at 816-701-3000.

Kanan Chatterjee, MD, MBA

Chief Medical Officer

VA Heartland Network (VISN 15)

# **Facility Director Comments**

# **Department of Veterans Affairs**

# **Memorandum**

**Date:** March 18, 2016

From: Director, Kansas City VA Medical Center, Kansas City, MO (589/00)

Subject: Review of CBOCs and OOCs of Kansas City VA Medical Center,

**Kansas City, MO** 

To: Director, VA Heartland Network (10N15)

I have reviewed the findings within the report of the Review of CBOCs and OOCs of the Kansas City VA Medical Center. I am in agreement with the findings of the review.

Corrective action plans have been established with planned completion dates outlined in this report.

(Original signed by :)

Kathleen R. Fogarty

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 the Facility Director ensures that signs identify the location of fire extinguishers that are in large rooms or are obscured from view at the Cameron VA Clinic.

Concur

Target date for completion: March 21, 2016

Facility response: A sign will be placed in an appropriate place indicating the location of the fire extinguisher.

**Recommendation 2.** We recommended that the clinic manager reviews the Cameron VA Clinic's hazardous materials inventory twice within a 12-month period.

Concur

Target date for completion: September 30, 2016

Facility response: Completed chemical inventories will be available on the Safety SharePoint site for review twice a year by the Clinic Nurse Manager.

**Recommendation 3.** We recommended that the Cameron VA Clinic manager ensures that a privacy sign is available for use when a telehealth visit is in progress.

Concur

Target date for completion: Completed

Facility response: An additional privacy sign was obtained. It has been in used by staff since February 15, 2016.

**Recommendation 4.** We recommended that clinic staff protect patient-identifiable information on laboratory specimens during transport to the parent facility.

Concur

Target date for completion: March 15, 2016

Facility response: A locking mechanism will be placed on the laboratory specimen bags and used during specimen transport. Staff will be educated on the requirement to transport specimens in a locked bag.

**Recommendation 5.** We recommended that providers sign Home Telehealth assessments and treatment plans.

#### Concur

Target date for completion: May 31, 2016

Facility response: Providers will be educated on the requirement to sign HT assessments and treatment plans. Compliance to the standard will be monitored through chart reviews. Weekly chart reviews on newly enrolled Home Telehealth (HT) patients will be conducted to evaluate compliance and will continue until 90% compliance achieved for three months.

**Recommendation 6.** We recommended that clinicians document the Home Telehealth enrollment process prior to the entry of monthly monitoring notes.

#### Concur

Target date for completion: May 31, 2016

Facility response: Education will be provided to Registered Nurses on the need to document the HT enrollment process prior to entry of monthly monitoring notes. Compliance to the standard will be monitored through chart reviews. Weekly chart reviews on newly enrolled Home Telehealth (HT) patients will be conducted to evaluate compliance and will continue until 90% compliance achieved for three months.

**Recommendation 7.** We recommended that clinicians consistently notify patients of their laboratory results within 14 days as required by VHA.

#### Concur

Target date for completion: June 2, 2016

Facility response: The policy on communication of test results is being updated to clearly outline expectations for reporting results to patients. Staff will be informed of policy requirements. Providers' compliance rate must be at least at the 90% target level. Compliance with notification of test results will be monitored via the EPRP process for the following measure: Ctr5: Normal test results timely to patient (14 days).

# Office of Inspector General Contact and Staff Acknowledgments

Contact	For more information about this report, please contact the OIG at (202) 461-4720.		
Inspection Team	on Team Sonia Whig, MS, LDN, Team Leader Myra Conway, MS, RN Terri Julian, Ph.D.		
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# **Report Distribution**

### **VA Distribution**

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Blaine Luetkemeyer; Mike Pompeo; Jason Smith; Ann Wagner; Kevin Yoder

This report is available at <a href="https://www.va.gov/oig">www.va.gov/oig</a>.

# **Endnotes**

- <sup>a</sup> References used for the EOC review included:
- International Association of Healthcare Central Services Materiel Management, *Central Service Technical Manual*, 7<sup>th</sup> ed.
- Joint Commission, Joint Commission Comprehensive Accreditation and Certification Manual, July 1, 2015.
- National Fire Protection Association (NFPA), NFPA 10: Installation of Portable Fire Extinguishers, 2013.
- National Fire Protection Association (NFPA), NFPA 101: Life Safety Code, 2015.
- US Department of Health and Human Services, *Health Information Privacy: The Health Insurance Portability and Accountability Act (HIPAA) Enforcement Rule*, February 16, 2006.
- US Department of Labor, Occupational Safety and Health Administration (OSHA), Fact Sheet: Hazard Communication Standard Final Rule, n.d.
- US Department of Labor, Occupational Safety and Health Administration (OSHA), Regulations (Standards 29 CFR), 1910 General Industry Standards, 120 Hazardous Waste Operations and Emergency Response, February 8, 2013.
- US Department of Labor, Occupational Safety and Health Administration (OSHA), Regulations (Standards 29 CFR), 1910 General Industry Standards, 1030 Bloodborne Pathogens, April 3, 2012.
- VA Directive 0059, VA Chemicals Management and Pollution Prevention, May 25, 2012.
- VA Handbook 6500, *Risk Management Framework for VA Information Systems Tier 3: VA Information Security Program*, March 10, 2015.
- VHA Center for Engineering, Occupational Safety, and Health (CEOSH), *Emergency Management Program Guidebook*, March 2011.
- VHA Directive 2011-007, Required Hand Hygiene Practices, February 16, 2011.
- VHA Directive 2012-026, Sexual Assaults & Other Defined Public Safety Incidents in VHA Facilities, September 27, 2012.
- VHA Handbook 1006.1, Planning and Activating Community-Based Outpatient Clinics, May 19, 2004.
- VHA Handbook 1101.10, Patient Aligned Care Team (PACT) Handbook, February 5, 2014.
- VHA Handbook 1160.01, Uniform Mental Health Services in VA Medical Centers and Clinics, September 11, 2008.
- VHA Handbook 1330.01, Health Care Services for Women Veterans, May 21, 2010.
- VHA Handbook 1605.1, Privacy and Release of Information, May 17, 2006.
- VHA Handbook 1907.01, Health Information Management, July 22, 2014.
- VHA Telehealth Services, Clinic Based Telehealth Operations Manual, July 2014.
- <sup>b</sup> References used for the HT Enrollment review included:
- VHA Office of VHA Telehealth Services Home Telehealth Operations Manual, April 13, 2015. Accessed from: <a href="http://vaww.telehealth.va.gov/pgm/ht/index.asp">http://vaww.telehealth.va.gov/pgm/ht/index.asp</a>.
- <sup>c</sup> References used for the Outpatient Lab Results Management review included:
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- <sup>e</sup> Reference used for Patient Aligned Care Team Compass data graphs:
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