Department of Veterans Affairs
Office of Inspector General

Office of Healthcare Inspections

Report No. 16-00016-241

Review of Community Based Outpatient Clinics and Other Outpatient Clinics of Hunter Holmes McGuire VA Medical Center Richmond, Virginia

April 8, 2016

Washington, DC 20420

To Report Suspected Wrongdoing in VA Programs and Operations
Telephone: 1-800-488-8244
E-Mail: vaoighotline@va.gov
(Hotline Information: www.va.gov/oig/hotline)

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

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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 Hunter Holmes McGuire VA Medical Center and Veterans Integrated Service Network 6 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 Fredericksburg VA Clinic, Fredericksburg, VA, as a representative site and evaluated the environment of care on February 2, 2016.

Review Results: We conducted four focused reviews and we made recommendations for improvement in the following four review areas:

Environment of Care: Ensure that:

- Contracted Environmental Management Service employees at the Fredericksburg VA Clinic receive annual training on the Exposure Control Plan for Bloodborne Pathogens.
- Fredericksburg VA Clinic contracted Environmental Management Service employees receive the required hazardous communications training.
- The clinic manager reviews the Fredericksburg VA Clinic's hazardous materials inventory twice within a 12-month period.
- The Fredericksburg VA Clinic manager provides feminine hygiene products and disposal bins in women's public restrooms.

Home Telehealth Enrollment: Ensure that:

- Clinicians document verbal informed consent for Home Telehealth services.
- Providers sign Home Telehealth assessments and treatment plans.
- Clinicians document monthly monitoring notes for each month of Home Telehealth program participation.

Outpatient Lab Results Management: Ensure that:

- The Facility Director ensures that the facility's written policy for the communication of laboratory results includes all required elements.
- Clinicians consistently notify patients of their laboratory results within 14 days as required by Veterans Health Administration.

- Clinicians consistently document in the electronic health record all attempts to communicate with the patients regarding their laboratory results.

Post-Traumatic Stress Disorder Care: Ensure that:

- Acceptable providers perform and document suicide risk assessments for all patients with positive Post-Traumatic Stress Disorder screens.

- Providers complete diagnostic evaluations for patients with positive Post-Traumatic Stress Disorder screens.

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 16–21, for the full text of the Directors' comments.) 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

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.[1] 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 Results Management	All patients who had outpatient (excluding emergency department, urgent care, or same day surgery orders) potassium and sodium serum lab test results during January 1, 2014, 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.

[1] 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.[a]

We reviewed relevant documents and conducted a physical inspection of the Fredericksburg 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.

Table 2. EOC

NM	Areas Reviewed	Findings	Recommendations
Document and Training Review			
	Managers monitored clinic staff's hand hygiene compliance.		
X	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.	At the Fredericksburg VA Clinic, none of the contracted Environmental Management Service employees provided evidence of receiving training on the Exposure Control Plan for Bloodborne Pathogens within the past 12 months.	**1.** We recommended that contracted Environmental Management Service employees at the Fredericksburg VA Clinic receive annual training on the Exposure Control Plan for Bloodborne Pathogens.
	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.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	The clinic had a policy that requires staff to receive regular information on their responsibilities in emergency response operations.		
	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.		
	The alarm system or panic buttons in high-risk areas were tested during the past 12 months.		
	The clinic had written procedures to follow in the event of a security incident.		
X	Clinic employees received training on the new chemical label elements and safety data sheet format.	At the Fredericksburg VA Clinic, the clinic manager provided no evidence of the contracted Environmental Management Service employees receiving any hazardous communications training on the new chemical label elements and safety data sheet format.	**2.** We recommended that the clinic manager ensures that Fredericksburg VA Clinic contracted Environmental Management Service employees receive the required hazardous communications training.
	The clinic had a policy/procedure for the cleaning and disinfection (between patients) of telehealth equipment.		
Physical Inspection			
	The clinic was clean.		
	The furnishings and equipment were safe and in good repair.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	Hand hygiene facilities and product dispensers were working and readily accessible to employees.		
	Personal protective equipment was available.		
	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.		
	For fire extinguishers located in large rooms or are obscured from view, the clinic identified the locations of the fire extinguishers with signs.		
	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 areas identified as security sensitive.		
	The clinic had an alarm system or panic buttons installed in high-risk areas.		

NM	Areas Reviewed (continued)	Findings	Recommendations
X	The clinic's inventory of hazardous materials was reviewed for accuracy twice within the prior 12 months.	The Fredericksburg VA Clinic's inventory of hazardous materials and waste was not reviewed for accuracy twice within the prior 12 months.	**3**. We recommended that the clinic manager reviews the Fredericksburg VA Clinic's hazardous materials inventory twice within a 12-month period.
	The clinic's safety data sheets for chemicals were readily available for the staff.		
	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.		
	A privacy sign was available for use to indicate that a telehealth visit was 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.		
	Clinic staff protected patient-identifiable information to maintain patient privacy 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.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	The clinic provided feminine hygiene products in examination rooms where pelvic examinations were performed or in bathrooms within close proximity.		
X	Women's public restrooms had feminine hygiene products and disposal bins available for use.	The Fredericksburg VA Clinic did not provide feminine hygiene products and disposal bins for use in women's public restrooms.	**4.** We recommended that the Fredericksburg VA Clinic manager provides feminine hygiene products and disposal bins in women's public restrooms.
	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.[b]

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.		
X	Clinicians documented the patient or caregiver's verbal informed consent for HT services.	Clinicians did not document verbal informed consent for HT services in 28 of 50 EHRs (56 percent).	**5.** We recommended that clinicians document verbal informed consent for Home Telehealth services.
	Clinicians documented assessments and treatment plans for HT patients.		
X	Providers signed HT assessments and treatment plans.	Providers did not sign 9 of 50 patients' HT assessments and treatment plans (18 percent).	**6**. We recommended that providers sign Home Telehealth assessments and treatment plans.
X	Monthly monitoring notes were documented for each month of HT program participation.	Clinicians did not document monthly monitoring notes for each month of program participation in 7 of 50 EHRs (14 percent).	**7.** We recommended that clinicians document monthly monitoring notes for each month of Home Telehealth program participation.
	Documentation of HT enrollment (consult, screening, and/or initial assessment notes) was completed prior to the entry of monthly 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.[c]

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 areas marked as NM did not meet applicable requirements and needed improvement.

Table 4. Outpatient Lab Results Management

NM	Areas Reviewed	Findings	Recommendations
	The facility has a written policy regarding communication of lab results from diagnostic practitioner to ordering practitioner.		
X	The facility has a written policy for the communication of lab results that included all required elements.	The facility's written policy for the communication of lab results did not require the documentation of treatment actions in response to abnormal test results in the patient's EHR.	**8**. We recommended that the Facility Director ensures that the facility's written policy for the communication of laboratory results includes all required elements.
X	Clinicians notified patients of their lab results.	Clinicians did not consistently notify 13 of 47 patients (28 percent) of their lab results within 14 days as required by VHA.	**9**. We recommended that clinicians consistently notify patients of their laboratory results within 14 days as required by VHA.
X	Clinicians documented in the EHR all attempts to communicate with the patients regarding their lab results.	For the patients who could not be contacted regarding their results, clinicians did not document all communication attempts with all of the nine patients.	**10.** We recommended that clinicians consistently document in the electronic health record all attempts to communicate with the patients regarding their laboratory 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.[d]

We reviewed relevant documents and 42 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 5. PTSD Care

NM	Areas Reviewed	Findings	Recommendations
X	Each patient with a positive PTSD screen received a suicide risk assessment.	Six of 42 patients (14 percent) with positive PTSD screens did not receive a suicide risk assessment.	**11.** We recommended that acceptable providers perform and document suicide risk assessments for all patients with positive PTSD screens.
	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.		
X	Providers completed diagnostic evaluations for patients with positive PTSD screens.	Providers did not complete clinical diagnostic evaluation in 7 of 31 EHRs (23 percent).	**12.** We recommended that providers complete diagnostic evaluations for patients with positive PTSD screens.
	Patients, when applicable, received mental health treatment.		

Clinic Profiles

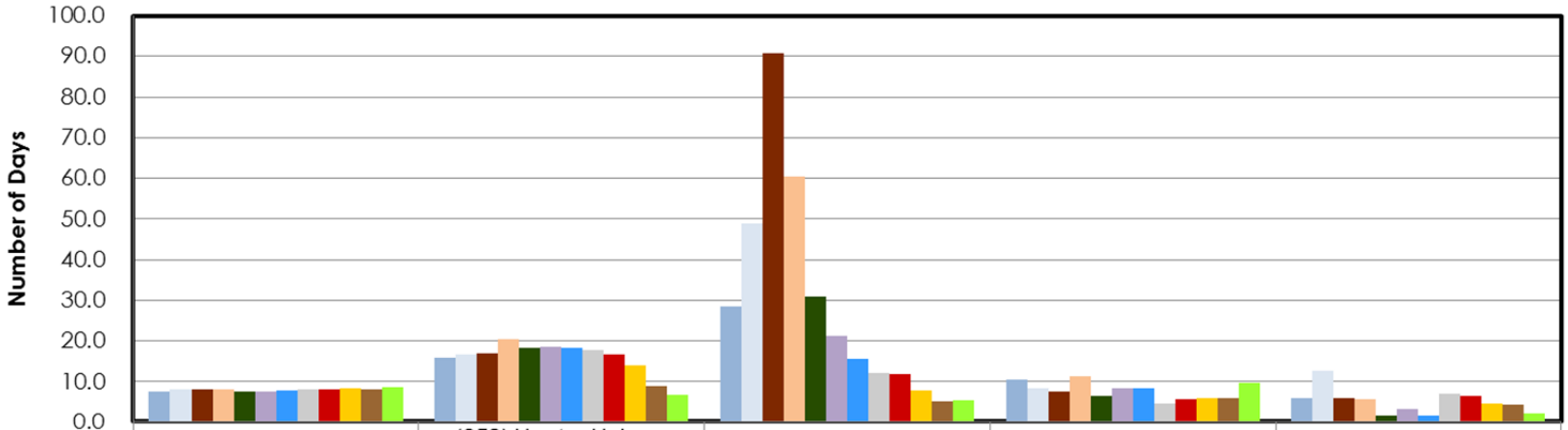
This review evaluates the quality of care provided to veterans at all of the outpatient clinics under the parent facility's oversight.[2] In addition to PC integrated with women's health, MH, and tele-health services, the CBOCs provide various specialty care and ancillary services. The following table provides information relative to each of the outpatient clinics and lists the services provided at each location.[3]

				Outpatient Workload / Encounters[4]			Services Provided[5]	
Location	**Station #**	**Rurality**	**Outpatient Classification[6]**	**PC**	**MH**	**Specialty Clinics[7]**	**Specialty Care[8]**	**Ancillary Services[9]**
Fredericksburg, VA	652GA	Urban	Primary Care CBOC	15,022	8,185	388	Dermatology	Diabetic Retinal Screening Home Based Primary Care MOVE! Program[10] Nutrition Pharmacy
Charlottesville, VA	652GE	Urban	Primary Care CBOC	7,203	4,334	381	Dermatology	Audiology Diabetic Retinal Screening Home Based Primary Care MOVE! Program Nutrition Pharmacy
Emporia, VA	652GF	Rural	Primary Care CBOC	4,540	2,289	79	NA	Home Based Primary Care MOVE! Program Pharmacy

[2] Includes all CBOCs in operation before August 15, 2015.
[3] http://vssc.med.va.gov/
[4] 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.
[5] 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.
[6] VHA Handbook 1006.02, *VHA Site Classifications and Definitions*, December 30, 2013.
[7] The total number of encounters for the services provided in the "Specialty Care" column.
[8] Specialty Care Services refer to non-Primary Care and non-Mental Health services provided by a physician.
[9] Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.
[10] VHA Handbook 1120.01, *MOVE! Weight Management Program for Veterans*, March 31, 2011.

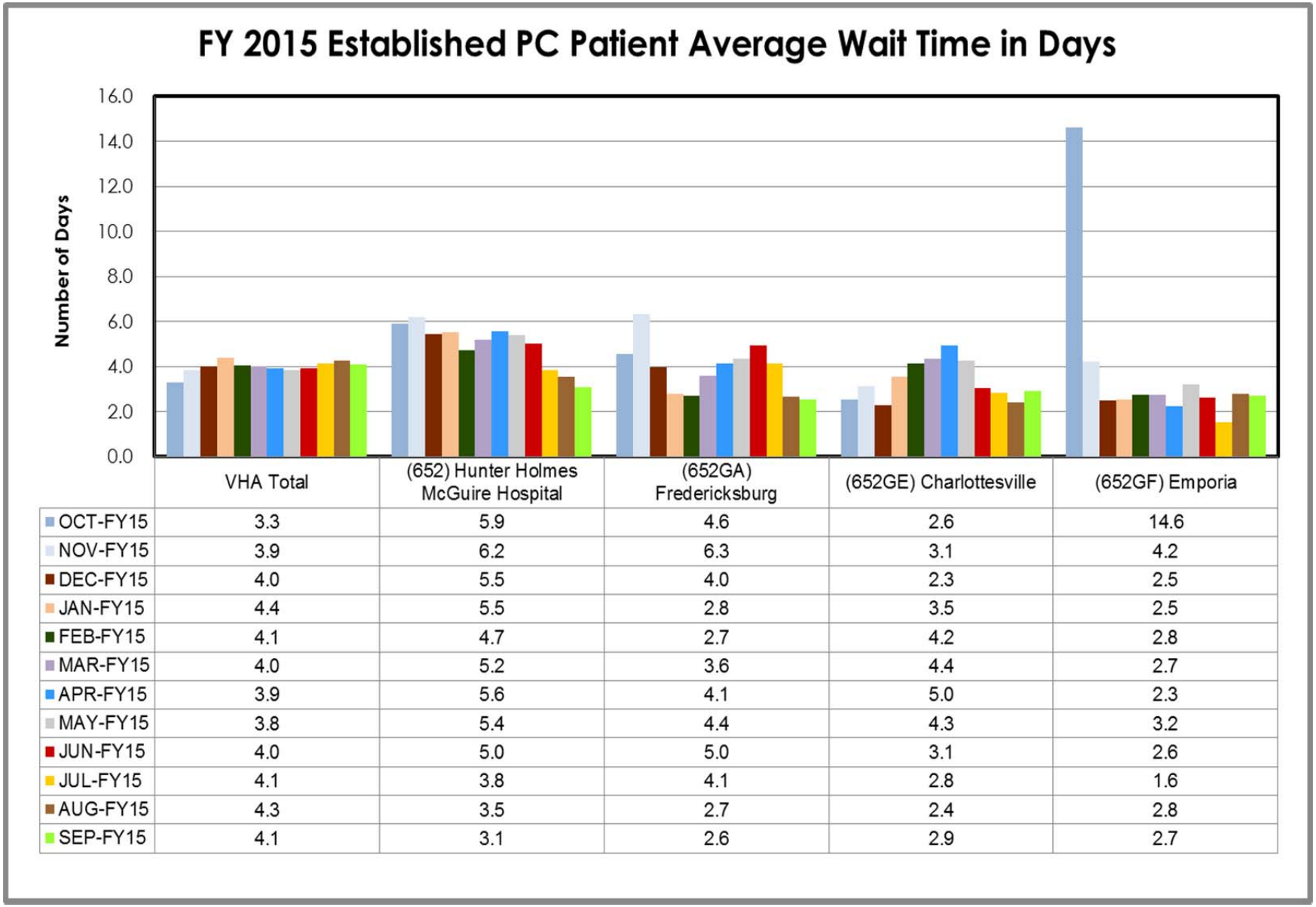
Patient Aligned Care Team Compass Metrics

FY 2015 New PC Patient Average Wait Time in Days



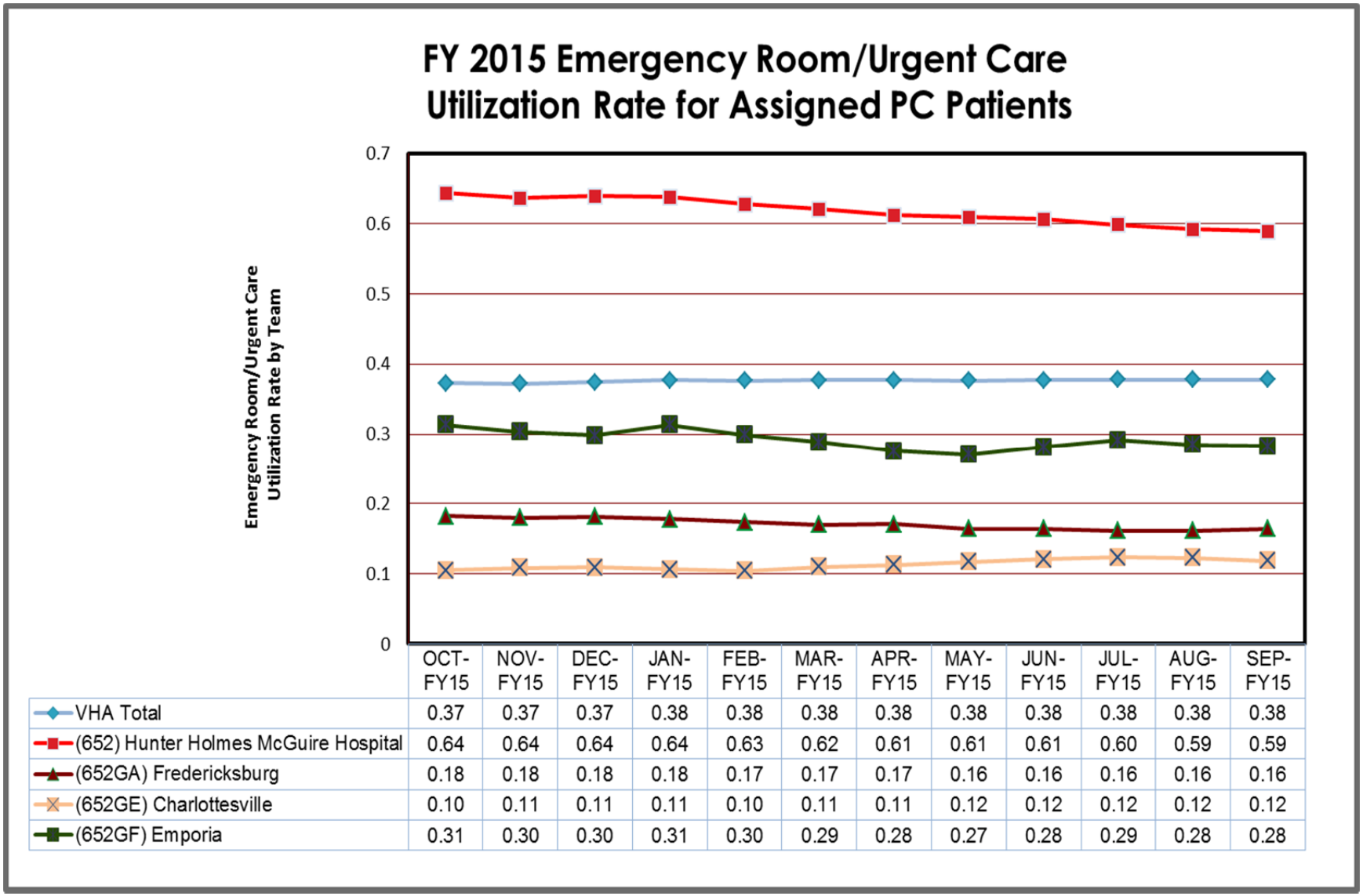
	VHA Total	(652) Hunter Holmes McGuire Hospital	(652GA) Fredericksburg	(652GE) Charlottesville	(652GF) Emporia
OCT-FY15	7.6	15.9	28.4	10.4	5.9
NOV-FY15	8.1	16.7	48.8	8.5	12.7
DEC-FY15	8.1	16.9	90.8	7.6	6.0
JAN-FY15	8.2	20.4	60.5	11.5	5.7
FEB-FY15	7.6	18.2	31.0	6.4	1.6
MAR-FY15	7.7	18.7	21.2	8.2	3.3
APR-FY15	7.9	18.4	15.5	8.3	1.8
MAY-FY15	8.2	17.6	12.2	4.5	7.2
JUN-FY15	8.0	16.6	12.0	5.7	6.6
JUL-FY15	8.3	14.1	7.9	6.0	4.5
AUG-FY15	8.1	8.9	5.1	6.0	4.5
SEP-FY15	8.7	6.8	5.5	9.8	2.1

Data Definition.[e] 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.*



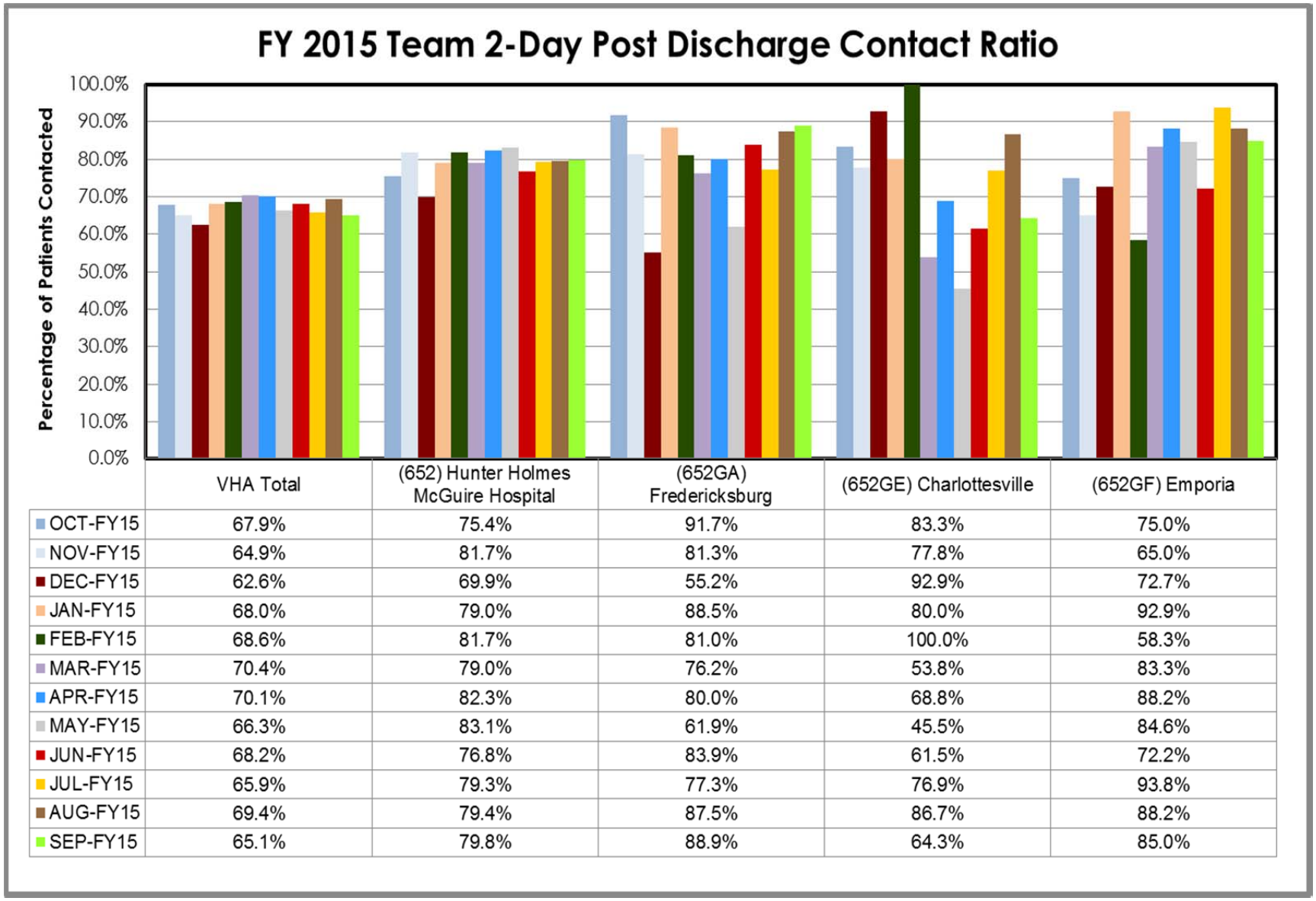
	VHA Total	(652) Hunter Holmes McGuire Hospital	(652GA) Fredericksburg	(652GE) Charlottesville	(652GF) Emporia
OCT-FY15	3.3	5.9	4.6	2.6	14.6
NOV-FY15	3.9	6.2	6.3	3.1	4.2
DEC-FY15	4.0	5.5	4.0	2.3	2.5
JAN-FY15	4.4	5.5	2.8	3.5	2.5
FEB-FY15	4.1	4.7	2.7	4.2	2.8
MAR-FY15	4.0	5.2	3.6	4.4	2.7
APR-FY15	3.9	5.6	4.1	5.0	2.3
MAY-FY15	3.8	5.4	4.4	4.3	3.2
JUN-FY15	4.0	5.0	5.0	3.1	2.6
JUL-FY15	4.1	3.8	4.1	2.8	1.6
AUG-FY15	4.3	3.5	2.7	2.4	2.8
SEP-FY15	4.1	3.1	2.6	2.9	2.7

Data Definition.[e] 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.



	OCT-FY15	NOV-FY15	DEC-FY15	JAN-FY15	FEB-FY15	MAR-FY15	APR-FY15	MAY-FY15	JUN-FY15	JUL-FY15	AUG-FY15	SEP-FY15
VHA Total	0.37	0.37	0.37	0.38	0.38	0.38	0.38	0.38	0.38	0.38	0.38	0.38
(652) Hunter Holmes McGuire Hospital	0.64	0.64	0.64	0.64	0.63	0.62	0.61	0.61	0.61	0.60	0.59	0.59
(652GA) Fredericksburg	0.18	0.18	0.18	0.18	0.17	0.17	0.17	0.16	0.16	0.16	0.16	0.16
(652GE) Charlottesville	0.10	0.11	0.11	0.11	0.10	0.11	0.11	0.12	0.12	0.12	0.12	0.12
(652GF) Emporia	0.31	0.30	0.30	0.31	0.30	0.29	0.28	0.27	0.28	0.29	0.28	0.28

Data Definition.[e] 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).



	VHA Total	(652) Hunter Holmes McGuire Hospital	(652GA) Fredericksburg	(652GE) Charlottesville	(652GF) Emporia
OCT-FY15	67.9%	75.4%	91.7%	83.3%	75.0%
NOV-FY15	64.9%	81.7%	81.3%	77.8%	65.0%
DEC-FY15	62.6%	69.9%	55.2%	92.9%	72.7%
JAN-FY15	68.0%	79.0%	88.5%	80.0%	92.9%
FEB-FY15	68.6%	81.7%	81.0%	100.0%	58.3%
MAR-FY15	70.4%	79.0%	76.2%	53.8%	83.3%
APR-FY15	70.1%	82.3%	80.0%	68.8%	88.2%
MAY-FY15	66.3%	83.1%	61.9%	45.5%	84.6%
JUN-FY15	68.2%	76.8%	83.9%	61.5%	72.2%
JUL-FY15	65.9%	79.3%	77.3%	76.9%	93.8%
AUG-FY15	69.4%	79.4%	87.5%	86.7%	88.2%
SEP-FY15	65.1%	79.8%	88.9%	64.3%	85.0%

Data Definition.[e] 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.

Appendix C

Veterans Integrated Service Network Director Comments

Department of Veterans Affairs

Memorandum

Date: March 11, 2016

From: Director, VA Mid-Atlantic Health Care Network VISN 6 (10N6)

Subject: **Review of CBOCs and OOCs of Hunter Holmes McGuire VA Medical Center, Richmond, VA**

To: Director**,** Kansas City Office of Healthcare Inspections (54KC)

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

1. The attached subject report is forwarded for your review and further action. I reviewed the response of the Richmond VA Medical Center (VAMC), Richmond, Virginia, and concur with the facility's recommendations.

2. If you have further questions, please contact John Brandecker, Director, Richmond VAMC, at (804) 675-5500.

DANIEL F. HOFFMANN, FACHE

Facility Director Comments

Department of Veterans Affairs

Memorandum

Date: March 8, 2016

From: Director, Hunter Holmes McGuire VA Medical Center (652/00)

Subject: **Review of CBOCs and OOCs of Hunter Holmes McGuire VA Medical Center, Richmond, VA**

To: Director, VA Mid-Atlantic Health Care Network VISN 6 (10N6)

1. I would like to express my appreciation to the Office of Inspector General Survey Team for their professional and comprehensive review conducted on February 1-5, 2016.

2. I have reviewed the draft report for Hunter Holmes McGuire VA Medical Center, Richmond, VA and concur with the findings and recommendations.

3. If you have any questions regarding the response to the recommendations, feel free to call me at (804) 675-5500.

John A. Brandecker, MBA, MPH
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 contracted Environmental Management Service employees at the Fredericksburg VA Clinic receive annual training on the Exposure Control Plan for Blood borne Pathogens.

Concur

Target date for completion: July 1, 2016

Facility response: The Practice Manager for the Fredericksburg CBOC will coordinate with the contracted Environmental Management Service to ensure that all employees working at the CBOC complete annual training on the Exposure Control Plan for Blood Borne Pathogens. Training records will be maintained by the Practice Manager for the Fredericksburg CBOC. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 2. We recommended that the clinic manager ensures that Fredericksburg VA Clinic contracted Environmental Management Service employees receive the required hazardous communications training.

Concur

Target date for completion: July 1, 2016

Facility response: The Practice Manager for the Fredericksburg CBOC will coordinate with the contracted Environmental Management Service to ensure that all employees working at the CBOC complete annual training on hazardous communications. Training records will be maintained by the Practice Manager for the Fredericksburg CBOC. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 3. We recommended that the clinic manager reviews the Fredericksburg VA Clinic's hazardous materials inventory twice within a 12-month period.

Concur

Target date for completion: July 15, 2016

Facility response: Fredericksburg VA Clinic's hazardous materials inventory was reviewed and submitted to Engineering Department December 31, 2015. It will be reviewed again and submitted June 30, 2016. To ensure compliance, departmental

leaders will review to ensure that the June inventory is completed. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 4. We recommended that the Fredericksburg VA Clinic manager provides feminine hygiene products and disposal bins in women's public restrooms.

Concur

Target date for completion: July 1, 2016

Facility response: A vending machine to provide feminine hygiene products and disposal bins in women's public restrooms has been ordered and will be installed. The CBOC Practice Manager will monitor to ensure timely completion of installation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 5. We recommended that clinicians document verbal informed consent for Home Telehealth services.

Concur

Target date for completion: July 15, 2016

Facility response: The Assessment Treatment Plan and Technology Education templates have been revised to include receipt of verbal consent for participation on all patients at enrollment. The Program is monitoring enrollment documentation and will monitor monthly with a target of 90% until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 6. We recommended that providers sign Home Telehealth assessments and treatment plans.

Concur

Target date for completion: July 15, 2016

Facility response: Care Coordinators were provided an in-service and have been reeducated on the requirement for Primary Care Provider's (PCP) additional signatures on Home Telehealth Assessments and Treatment Plans. The Home Telehealth Enrollment Summary Checklist was updated to include verification that the Assessment Treatment Plan note was sent to the PCP for additional signature. The program will conduct 100% review of new Veteran enrollments into the Home Telehealth program and will monitor monthly with a target of 90% compliance in requesting PCP signatures until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 7. We recommended that clinicians document monthly monitoring notes for each month of Home Telehealth program participation.

Concur

Target date for completion: July 15, 2016

Facility response: Reports will be run monthly by the program support assistant to reconcile Veterans enrolled in the Home Telehealth program and a list of monthly note completions. Care Coordinators will be informed of any outstanding notes to ensure timely completion of the required monthly note. Vendor enrollment data, Patient Care Encounter Location Encounter report, and CPRS Monthly Monitor Note data will be generated and compared monthly with a target of 90% compliance for completion of the Monthly Monitor Note until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 8. We recommended that the Facility Director ensures that the facility's written policy for the communication of laboratory results includes all required elements.

Concur

Target date for completion: July 1, 2016

Facility response: Facility leaders will develop a written policy to establish the requirement for patients to receive communication regarding lab results in accordance with all requirements of VHA Directive 1088. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 9. We recommended that clinicians consistently notify patients of their laboratory results within 14 days as required by VHA.

Concur

Target date for completion: July 15, 2016

Facility response: All clinicians and PACT team members who will be notifying patients on their Laboratory results will receive education on consistently notifying patients of their laboratory results consistent with VHA Directive 1088. Primary Care Service will monitor medical record documentation monthly with a target of 90% compliance until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 10. We recommended that clinicians consistently document in the electronic health record all attempts to communicate with the patients regarding their laboratory results.

Concur

Target date for completion: July 15, 2016

Facility response: All clinicians and PACT team members who will be notifying patients on their Laboratory results will receive education on consistently documenting all attempts to communicate with patients regarding their laboratory results. Primary Care Service will monitor medical record documentation monthly with a target of 90% compliance until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 11. We recommended that acceptable providers perform and document suicide risk assessments for all patients with positive PTSD screens.

Concur

Target date for completion: July 15, 2016

Facility response: Outpatient Providers will be educated about the need to perform and document timely suicide risk assessments for all patients with positive PTSD screens. A VISTA report will be run monthly by Primary Care Service to identify Veterans with positive PTSD screens and a chart audit completed with a target of 90% compliance with the requirement until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

Recommendation 12. We recommended that providers complete diagnostic evaluations for patients with positive PTSD screens.

Concur

Target date for completion: July 15, 2016

Facility response: The PTSD clinic will directly schedule intakes for each referral for a positive PTSD screen. Chart reviews will be conducted by Mental Health Service monthly with a target of 90% completion of the diagnostic evaluations for patients with positive PTSD screens until the OIG closes the recommendation. This will be reported to the Quality Executive Board and recorded in the meeting minutes.

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	Sherrian Pater, RN, CPHQ, Team Leader Cindy Niemack-Brown, CMSW, LMHP Stephanie Hensel, RN, JD Larry Selzler, MSPT James Seitz, RN, MBA Laura Snow, LCSW, MHCL
Other Contributors	Shirley Carlile, BA Lin Clegg, PhD Marnette Dhooghe, MS Jennifer Reed, RN, MSHI Larry Ross, Jr., MS Marilyn Stones, BS Mary Toy, RN, MSN Jarvis Yu, MS

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Endnotes

[a] References used for the EOC review included:

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- Joint Commission, *Joint Commission Comprehensive Accreditation and Certification Manua*l, July 1, 2015.
- National Fire Protection Association (NFPA), *NFPA 10: Installation of Portable Fire Extinguishers,* 2013.
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- 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.

[b] References used for the HT Enrollment review included:

- *VHA Office of VHA Telehealth Services Home Telehealth Operations Manual*, April 13, 2015. Accessed from: http://vaww.telehealth.va.gov/pgm/ht/index.asp.

[c] References used for the Outpatient Lab Results Management review included:

- VHA, *Communication of Test Results Toolkit*, April 2012.
- VHA Handbook 2009-019, *Ordering and Reporting Test Results,* March 24, 2009.

[d] References used for the PTSD Care review included:

- Department of Veterans Affairs Memorandum, *Information Bulletin: Clarification of Posttraumatic Stress Disorder Screening Requirements*, August 2015.
- *VA/DoD Clinical Practice Guideline for Management of Post-Traumatic Stress*, Version 2.0, October 2010.
- VHA Handbook 1160.01, *Uniform Mental Health Services in VA Medical Centers and Clinics*, September 11, 2008.
- VHA Handbook 1160.03, *Programs for Veterans with Post-Traumatic Stress Disorder (PTSD)*, March 12, 2010.
- *VHA Technical Manual – PTSD*, VA Measurement Manual PTSD-51.

[e] Reference used for Patient Aligned Care Team Compass data graphs:

- Department of Veterans' Affairs, *Patient Aligned Care Teams Compass Data Definitions*, accessed: June 25, 2015.