Department of Veterans Affairs
Office of Inspector General

Office of Healthcare Inspections

Report No. 16-00027-318

Review of Community Based Outpatient Clinics and Other Outpatient Clinics of VA Connecticut Healthcare System West Haven, Connecticut

June 10, 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 VA Connecticut Healthcare System and Veterans Integrated Service Network 1 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 Winsted VA Clinic, Winsted, CT, as a representative site and evaluated the environment of care on March 22, 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:

- Fire drills and fire drill critiques are conducted at least every 12 months at the Winsted VA Clinic.
- The information technology server closet is maintained according to information technology safety and security standards at the Winsted VA Clinic.

Home Telehealth Enrollment: Ensure that clinic providers:

- Sign Home Telehealth assessments and treatment plans.

Outpatient Lab Results Management: Ensure that:

- The facility's written policy for the communication of laboratory results includes all required elements.
- Clinicians consistently notify patients of their laboratory results as required by VHA.

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 16–20, for the full text of the Directors' comments.) We consider recommendation 1 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

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 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 Winsted CBOC. 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
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.		
X	The clinic conducted fire drills at least once every 12 months for the past 24 months with documented critiques of the drills.	Fire drills at the Winsted VA Clinic were not conducted at least once every 12 months for the past 2 years.	**1**. We recommended that the Facility Director ensures that fire drills and fire drill critiques are conducted at least every 12 months at the Winsted VA Clinic.
	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.		
	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 equipment.		
Physical 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.		
	Sharps containers were closable, easily accessible, and not overfilled.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	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.		
NA	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.		
	The clinic's inventory of hazardous materials was reviewed for accuracy twice within the prior 12 months.		
	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.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	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.		
	The clinic provided feminine hygiene products in examination rooms where pelvic examinations were performed or in bathrooms within close proximity.		
	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.		

NM	Areas Reviewed (continued)	Findings	Recommendations
X	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 at the Winsted VA Clinic was not restricted to personnel authorized by Office of Information and Technology.	**2**. We recommended that the Winsted VA Clinic manager ensures that the information technology server closet is maintained according to information technology safety and security standards.
	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 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 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 treatment plans.	Providers did not sign 41 of 48 applicable patients' HT assessments and treatment plans (85 percent).	**3**. We recommended that providers sign Home Telehealth assessments and treatment plans.
	Monthly monitoring notes were documented for each month of HT 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 48 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 communication of lab results to patients no later than 14 days from the date on which the results are available to the ordering practitioner, or require the documentation of treatment actions in response to abnormal test results in the patient's EHR.	**4**. 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 16 of 48 patients (33 percent) of their lab results within 14 days as required by VHA.	**5**. We recommended that clinicians consistently notify patients of their laboratory results 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.[d]

We reviewed relevant documents and 45 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

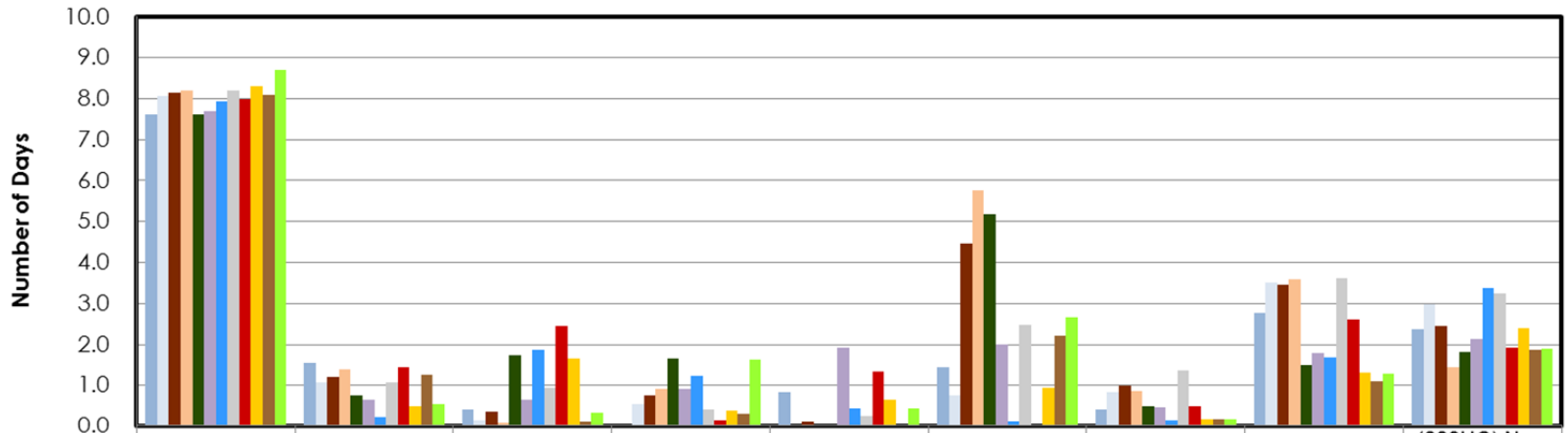
This review evaluates the quality of care provided to veterans at all of the outpatient clinics under the parent facility's oversight.[2] In addition to PC integrated with women's health, mental health, and tele-health services, the CBOCs provide various specialty care and ancillary services. The following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

				Outpatient Workload / Encounters[3]			Services Provided[4]	
Location	**Station #**	**Rurality[5]**	**Outpatient Classification[6]**	**PC**	**Mental Health**	**Specialty Clinics[7]**	**Specialty Care[8]**	**Ancillary Services[9]**
Waterbury, CT	689GA	Urban	Primary Care CBOC	4,390	1,320	9	NA	MOVE! Program[10] Pharmacy
Stamford, CT	689GB	Urban	Primary Care CBOC	2,763	1,396	23	NA	NA
Willimantic, CT	689GC	Rural	Primary Care CBOC	3,382	2,406	42	NA	MOVE! Program
Winsted, CT	689GD	Rural	Primary Care CBOC	4,035	1,601	51	NA	MOVE! Program
Danbury, CT	689GE	Urban	Primary Care CBOC	3,533	1,621	28	NA	NA
New London, CT	689HC	Urban	Primary Care CBOC	8,831	3,340	24	NA	MOVE! Program Pharmacy

[2] Includes all CBOCs in operation before August 15, 2015. We have omitted 689QA (West Haven), as no workload/encounters or services were reported.
[3] 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.
[4] 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.
[5] http://vssc.med.va.gov/
[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.

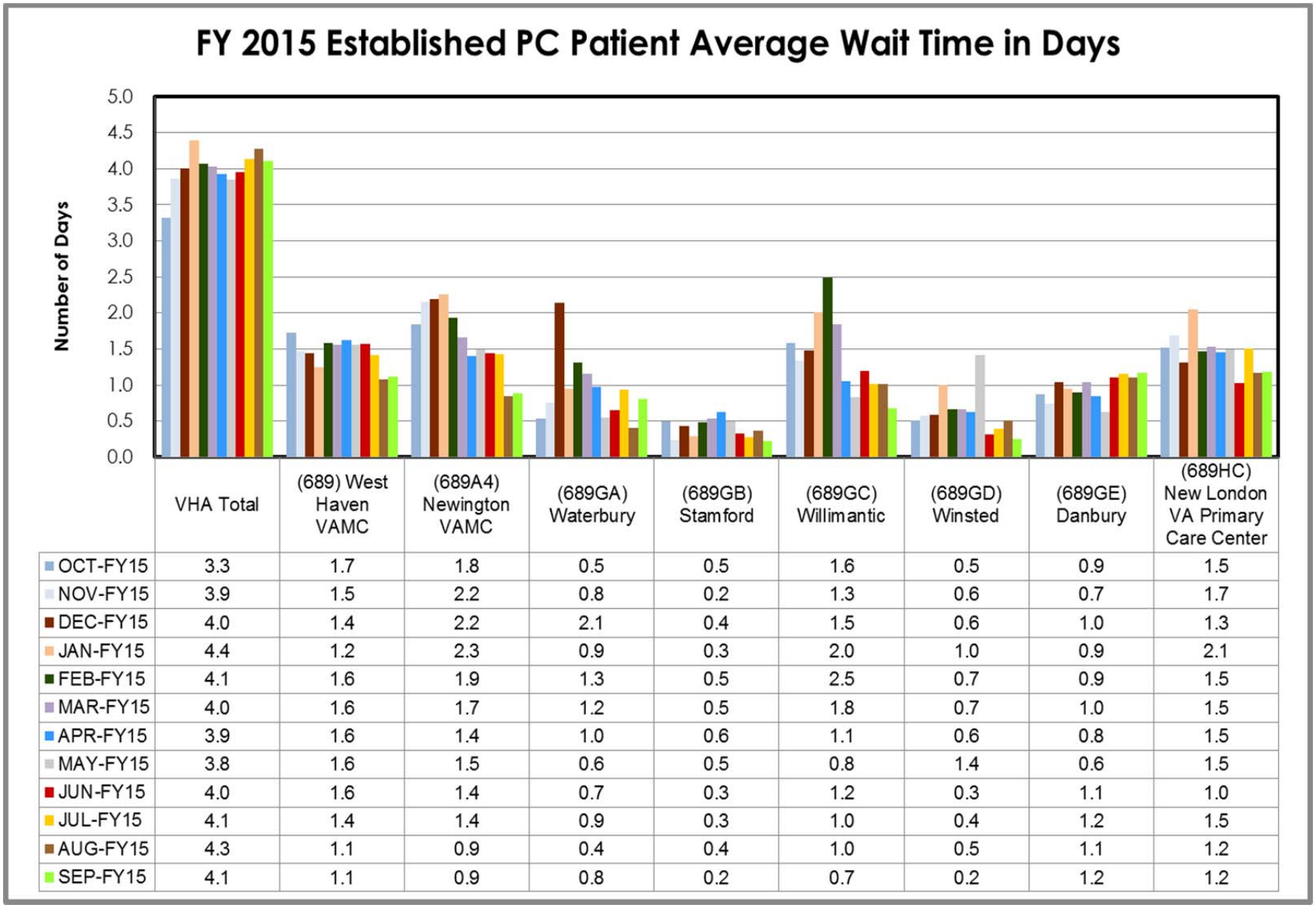
Patient Aligned Care Team Compass Metrics

FY 2015 New PC Patient Average Wait Time in Days



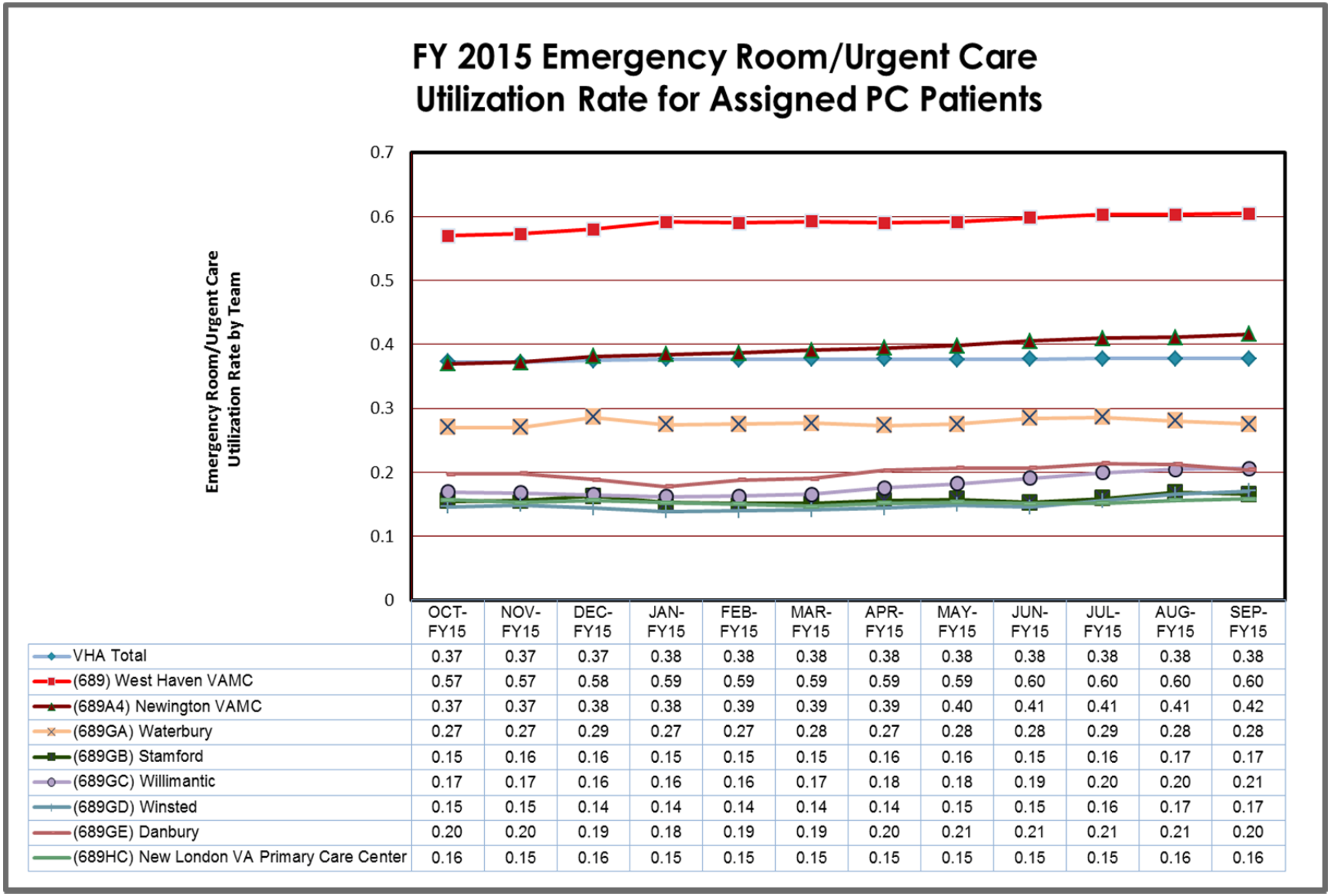
	VHA Total	(689) West Haven VAMC	(689A4) Newington VAMC	(689GA) Waterbury	(689GB) Stamford	(689GC) Willimantic	(689GD) Winsted	(689GE) Danbury	(689HC) New London VA Primary Care Center
OCT-FY15	7.6	1.5	0.4	0.0	0.8	1.4	0.4	2.8	2.4
NOV-FY15	8.1	1.1	0.1	0.6	0.0	0.8	0.8	3.5	3.0
DEC-FY15	8.1	1.2	0.4	0.8	0.1	4.5	1.0	3.5	2.4
JAN-FY15	8.2	1.4	0.1	0.9	0.0	5.8	0.9	3.6	1.5
FEB-FY15	7.6	0.8	1.7	1.7	0.0	5.2	0.5	1.5	1.8
MAR-FY15	7.7	0.7	0.7	0.9	1.9	2.0	0.5	1.8	2.1
APR-FY15	7.9	0.2	1.9	1.2	0.4	0.1	0.1	1.7	3.4
MAY-FY15	8.2	1.1	1.0	0.4	0.3	2.5	1.4	3.6	3.2
JUN-FY15	8.0	1.5	2.4	0.1	1.3	0.0	0.5	2.6	1.9
JUL-FY15	8.3	0.5	1.7	0.4	0.7	1.0	0.2	1.3	2.4
AUG-FY15	8.1	1.3	0.1	0.3	0.0	2.2	0.2	1.1	1.9
SEP-FY15	8.7	0.6	0.3	1.6	0.4	2.7	0.2	1.3	1.9

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.*



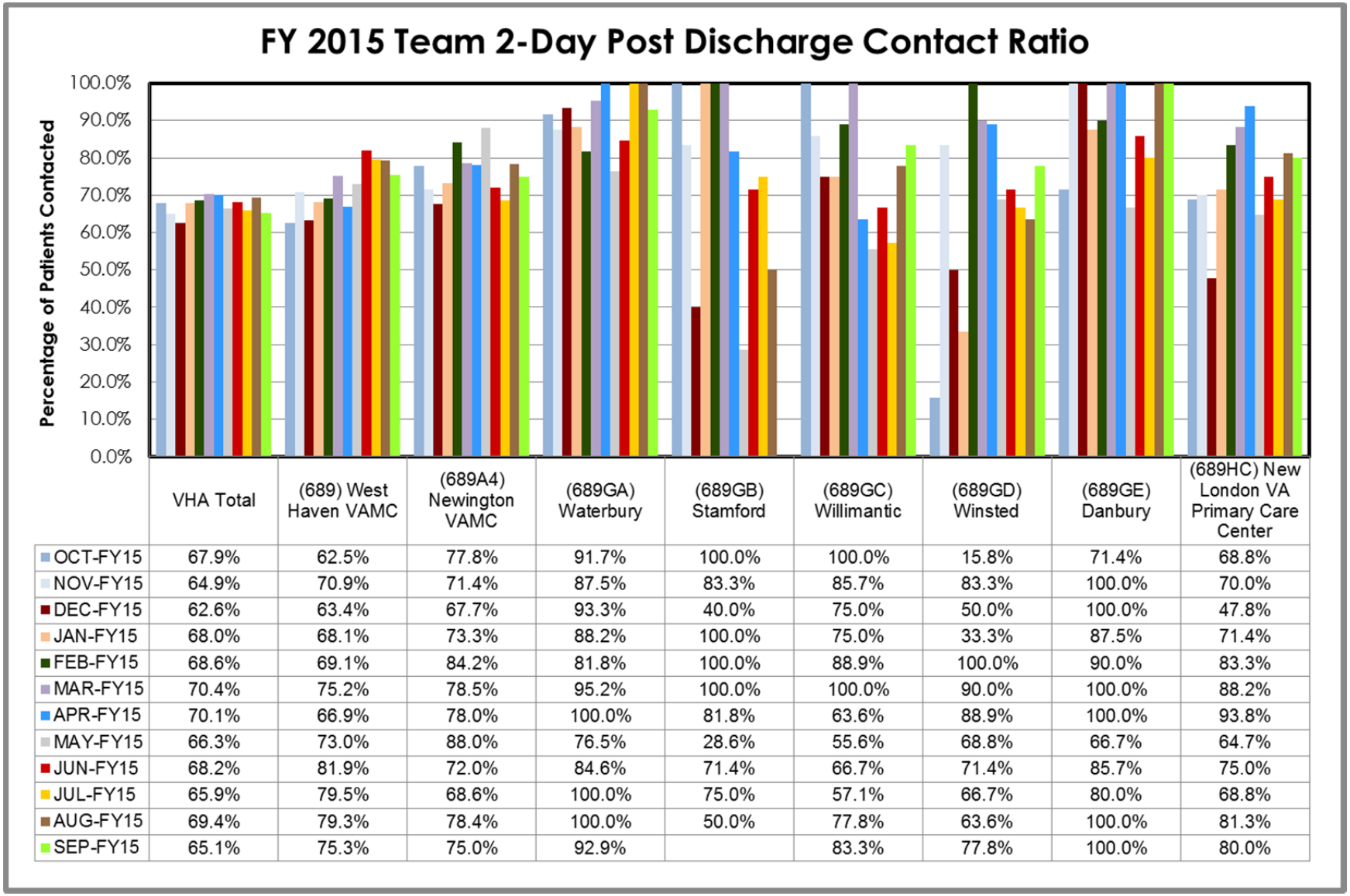
	VHA Total	(689) West Haven VAMC	(689A4) Newington VAMC	(689GA) Waterbury	(689GB) Stamford	(689GC) Willimantic	(689GD) Winsted	(689GE) Danbury	(689HC) New London VA Primary Care Center
OCT-FY15	3.3	1.7	1.8	0.5	0.5	1.6	0.5	0.9	1.5
NOV-FY15	3.9	1.5	2.2	0.8	0.2	1.3	0.6	0.7	1.7
DEC-FY15	4.0	1.4	2.2	2.1	0.4	1.5	0.6	1.0	1.3
JAN-FY15	4.4	1.2	2.3	0.9	0.3	2.0	1.0	0.9	2.1
FEB-FY15	4.1	1.6	1.9	1.3	0.5	2.5	0.7	0.9	1.5
MAR-FY15	4.0	1.6	1.7	1.2	0.5	1.8	0.7	1.0	1.5
APR-FY15	3.9	1.6	1.4	1.0	0.6	1.1	0.6	0.8	1.5
MAY-FY15	3.8	1.6	1.5	0.6	0.5	0.8	1.4	0.6	1.5
JUN-FY15	4.0	1.6	1.4	0.7	0.3	1.2	0.3	1.1	1.0
JUL-FY15	4.1	1.4	1.4	0.9	0.3	1.0	0.4	1.2	1.5
AUG-FY15	4.3	1.1	0.9	0.4	0.4	1.0	0.5	1.1	1.2
SEP-FY15	4.1	1.1	0.9	0.8	0.2	0.7	0.2	1.2	1.2

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
(689) West Haven VAMC	0.57	0.57	0.58	0.59	0.59	0.59	0.59	0.59	0.60	0.60	0.60	0.60
(689A4) Newington VAMC	0.37	0.37	0.38	0.38	0.39	0.39	0.39	0.40	0.41	0.41	0.41	0.42
(689GA) Waterbury	0.27	0.27	0.29	0.27	0.27	0.28	0.27	0.28	0.28	0.29	0.28	0.28
(689GB) Stamford	0.15	0.16	0.16	0.15	0.15	0.15	0.16	0.16	0.15	0.16	0.17	0.17
(689GC) Willimantic	0.17	0.17	0.16	0.16	0.16	0.17	0.18	0.18	0.19	0.20	0.20	0.21
(689GD) Winsted	0.15	0.15	0.14	0.14	0.14	0.14	0.14	0.15	0.15	0.16	0.17	0.17
(689GE) Danbury	0.20	0.20	0.19	0.18	0.19	0.19	0.20	0.21	0.21	0.21	0.21	0.20
(689HC) New London VA Primary Care Center	0.16	0.15	0.16	0.15	0.15	0.15	0.15	0.15	0.15	0.15	0.16	0.16

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	(689) West Haven VAMC	(689A4) Newington VAMC	(689GA) Waterbury	(689GB) Stamford	(689GC) Willimantic	(689GD) Winsted	(689GE) Danbury	(689HC) New London VA Primary Care Center
OCT-FY15	67.9%	62.5%	77.8%	91.7%	100.0%	100.0%	15.8%	71.4%	68.8%
NOV-FY15	64.9%	70.9%	71.4%	87.5%	83.3%	85.7%	83.3%	100.0%	70.0%
DEC-FY15	62.6%	63.4%	67.7%	93.3%	40.0%	75.0%	50.0%	100.0%	47.8%
JAN-FY15	68.0%	68.1%	73.3%	88.2%	100.0%	75.0%	33.3%	87.5%	71.4%
FEB-FY15	68.6%	69.1%	84.2%	81.8%	100.0%	88.9%	100.0%	90.0%	83.3%
MAR-FY15	70.4%	75.2%	78.5%	95.2%	100.0%	100.0%	90.0%	100.0%	88.2%
APR-FY15	70.1%	66.9%	78.0%	100.0%	81.8%	63.6%	88.9%	100.0%	93.8%
MAY-FY15	66.3%	73.0%	88.0%	76.5%	28.6%	55.6%	68.8%	66.7%	64.7%
JUN-FY15	68.2%	81.9%	72.0%	84.6%	71.4%	66.7%	71.4%	85.7%	75.0%
JUL-FY15	65.9%	79.5%	68.6%	100.0%	75.0%	57.1%	66.7%	80.0%	68.8%
AUG-FY15	69.4%	79.3%	78.4%	100.0%	50.0%	77.8%	63.6%	100.0%	81.3%
SEP-FY15	65.1%	75.3%	75.0%	92.9%		83.3%	77.8%	100.0%	80.0%

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. Blank cells indicate the absence of reported data.

Appendix C

Veterans Integrated Service Network Director Comments

Department of Veterans Affairs

Memorandum

Date: May 5, 2016

From: Director, VA New England Healthcare System (10N1)

Subject: **Review of CBOCs and OOCs of VA Connecticut Healthcare System, West Haven, CT**

To: Director**,** Bedford Office of Healthcare Inspections (54BN)

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

I have reviewed and concur with the action plans regarding the review of Community Based Outpatient Clinics (CBOC) and Other Outpatient Clinics at the VA Connecticut HCS.

Sincerely,

Cody D. Couch
Chief Financial Officer, VISN 1

For
Michael F. Mayo-Smith, MD, MPH
Director, VA New England Healthcare System (10N1)

Facility Director Comments

Department of Veterans Affairs

Memorandum

Date: May 5, 2016

From: Director, VA Connecticut Healthcare System (689/00)

Subject: **Review of CBOCs and OOCs of VA Connecticut Healthcare System, West Haven, CT**

To: Director, VA New England Healthcare System (10N1)

1. Thank you for the opportunity to review the draft report of the Review of CBOCs and OOCs of VA Connecticut Healthcare System, West Haven, CT.

2. I concur with the action plans set forth in this report.

3. If you have additional questions or need further information, please contact me at (203) 932-5711 ext. 2800.

Gerald Culliton
Director, VA Connecticut Healthcare System (689/00)

John Callahan
Associate Director

For
Gerald Culliton
Director, VA Connecticut Healthcare System (689/00)

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 fire drills and fire drill critiques are conducted at least every 12 months at the Winsted VA Clinic.

Concur

Target date for completion: April 1, 2016

Facility response: VA Connecticut Healthcare System Fire & Life Safety Specialist conducted drills at each CBOC in February 2016. They included a package on how to conduct a Fire drill at each location and talking points on what needs to be discussed during the drill (because all spaces are leased). We also had each CBOC update their fire plan with evacuation routes and rally points. They also have several blank copies of the Fire Drill critique and have been educated on how to complete if there is a "real" alarm in their building or if the landlord conducts a drill. We will be following up with each CBOC to remind them that at least one drill is due by the end of February 2017 to complete their annual requirement. Any actual emergencies will be documented. List will be maintained by the Fire & Life Safety Specialist.

Recommendation 2. We recommended that the Winsted VA Clinic manager ensures that the information technology server closet is maintained according to information technology safety and security standards.

Concur

Target date for completion: August 1, 2016

Facility response: VA Connecticut Healthcare System Facility operations staff immediately worked with the CBOC staff and Head Nurse Managers, as well as the IT department, to reissue an IT closet access authorized staff list. One staff member and an alternate at each CBOC site have been designated to have key access in the event entry is needed into the IT closet. The Head Nurse Manager and Facility Operations Specialist may also have access. Revised list has been posted in each CBOC and signed off by OI&T. Staff members have been refreshed in their education that the door will otherwise remain locked. The list will be reviewed by OI&T staff should they need to gain entry into the closet and by authorized staff when they allow entry. Should the assigned staff member change assigned locations, the list will be updated immediately.

Recommendation 3. We recommended that providers sign Home Telehealth assessments and treatment plans.

Concur

Target date for completion: August 31, 2016

Facility response:

1. The VA Connecticut Healthcare System Director of Case Management and Home Telehealth has added a notation to the Initial Assessment & Treatment Plan note to cue staff to add the PCP, PACT RN and as appropriate, other clinical staff as additional signers to HT assessments and treatment plans. The VA Connecticut Orientation & Toolkit was revised in May 2015 to remind all Telehealth Care Coordinators to identify PCP, PACT RN, and/or Specialty Care Provider as additional signers (Section VIII of Toolkit). It is noted in the toolkit ***"This note must have the PCP and PACT RN (and/or ordering Specialty Care Provider) identified as additional signers".*** The Office of Telehealth Services Operations Manual was distributed to all Telehealth Care Coordination staff and was discussed at a staff meeting.

2. For continuous quality improvement - the Peer Documentation Performance Improvement monitor has been revised to include confirmation Telehealth Care Coordinator identifies PCP and PACT RN on Assessment & Treatment Note.

3. A 60 day review from Jan 1, 2016 – March 1, 2016 of Telehealth Care Coordinators' compliance with identifying PCP and PACT RN revealed significant improvement in Telehealth Care Coordination Staff compliance:
    - 94 consults were assigned to Telehealth Care Coordination staff were reviewed
    - 83 had PCP/PACT and/or other Specialty Provider added as additional signer (88 %)
    - 93 of these 94 consults had SMART Goals identified (99%)

4. A review for patients enrolled on Home Telehealth for the time period from March7-March 16, 2016 showed 100% of Assessment and Treatment Plan notes had the PCP identified as a cosigner which was discussed with the OIG auditor at the time of the visit.

5. New performance monitor of auditing charts monthly to assure providers sign HT Assessment and Treatment Plans is in place. In the most current review, April 1 through April 28, 2016, there is 100% adherence with providers signing home telehealth assessments and treatment plans. This review will continue monthly for no less than 3 months with results reported through Quality Management and shared through the combined Medical Staff Executive Committee and CQI Council meeting.

Recommendation 4. 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: June 1, 2016

Facility response: VA Connecticut Healthcare System has completed their review of health system policy on "Communicating test results to providers and patients". This policy was reviewed and revised in compliance with VHA Directive 1088: COMMUNICATING TEST RESULTS TO PROVIDERS AND PATIENTS. This policy has entered into the concurrence process with intent to be published within approximately 2 weeks.

Recommendation 5. We recommended that clinicians consistently notify patients of their laboratory results as required by VHA.

Concur

Target date for completion: August 31, 2016

Facility response: VA Connecticut Healthcare System immediately discussed this issue with the CBOC and Outpatient providers and staff and has educated them on documentation requirements in the chart regarding the communication of lab results. The CBOC providers will communicate to staff that a letter must be generated for the notification of patient's normal test results within 14 days or documentation in their note if the patient is seen within the time frame and patients with abnormal results must be contacted within 7 days of receipt of result or sooner if necessary.

Monitoring of compliance with notification of test results will be conducted for no less than a period of three months and provider specific feedback will be given through Primary Care leadership.

Aggregate results of notification of test results will be reported to the Chief, Quality Management on a regular basis for a period no less than 3 months. Documentation will be available through the combined Medical Staff Executive Committee and CQI Council meeting.

Office of Inspector General
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This report is available at **www.va.gov/oig**.

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.
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- 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.
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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.