



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Healthcare Inspections

VETERANS HEALTH ADMINISTRATION

Comprehensive Healthcare
Inspection Program Review
of the Veterans Health Care
System of the Ozarks

Fayetteville, Arkansas



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Figure 1. Veterans Health Care System of the Ozarks Fayetteville, Arkansas
(Source: <https://vaww.va.gov/directory/guide/>, accessed on May 21, 2018)

Abbreviations

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



Report Overview

This Comprehensive Healthcare Inspection Program (CHIP) review provides a focused evaluation of the quality of care delivered in the inpatient and outpatient settings of the Veterans Health Care System of the Ozarks (Facility). The review covers key clinical and administrative processes that are associated with promoting quality care.

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

The OIG's current areas of focus are

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

This review was conducted during an unannounced visit made during the week of February 26, 2018. The OIG conducted interviews and reviewed clinical and administrative processes related to areas of focus that affect patient care outcomes. Although the OIG reviewed a spectrum of clinical and administrative processes, the sheer complexity of VA medical centers limits the ability to assess all areas of clinical risk. The findings presented in this report are a snapshot of Facility performance within the identified focus areas at the time of the OIG visit. Although it is difficult to quantify the risk of patient harm, the findings in this report may help facilities identify areas of vulnerability or conditions that, if properly addressed, could improve patient safety and healthcare quality.

Results and Review Impact

Leadership and Organizational Risks

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

The Interim Director and Interim Associate Director have served in a temporary capacity since February 20, 2018. The Chief of Staff and ADPCS were permanently assigned to their positions in December 2012 and December 2014, respectively.

In the review of selected employee and patient survey results regarding Facility leaders, the OIG noted that employees appear satisfied with leadership, and patients appear satisfied with the care provided.

The OIG recognizes that the Strategic Analytics for Improvement and Learning (SAIL) model has limitations for identifying all areas of clinical risk but is “a way to understand the similarities and differences between the top and bottom performers” within VHA.¹ Although the leadership team was knowledgeable about selected SAIL metrics, the leaders should continue to take actions to improve performance of the Quality of Care and Access metrics likely contributing to the current “4-Star” rating.

Additionally, the OIG reviewed accreditation agency findings, sentinel events,² disclosures of adverse patient events, and Patient Safety Indicator data and did not identify the presence of any substantial organizational risk factors.

The OIG noted findings in five of the eight areas of clinical operations reviewed and issued six recommendations that are attributable to the Interim Facility Director, Chief of Staff, and Interim Associate Director. These are briefly described below.

¹ VHA’s Office of Operational Analytics and Reporting developed a model for understanding a facility’s performance in relation to nine quality domains and one efficiency domain. The domains within SAIL are made up of multiple composite measures, and the resulting scores permit comparison of facilities within a Veterans Integrated Service Network or across VHA. The SAIL model uses a “star” rating system to designate a facility’s performance in individual measures, domains, and overall quality.
<http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=2146>.
(Website accessed on April 16, 2017.)

² A sentinel event is an incident or condition that results in patient death, permanent harm, severe temporary harm, or intervention required to sustain life.

Quality, Safety, and Value

The OIG found general compliance with protected peer review and patient safety. However, the OIG identified a deficiency with interdisciplinary review of UM data.

Credentialing and Privileging

The OIG found general compliance with requirements for credentialing and Focused Professional Practice Evaluation processes. However, the OIG identified a deficiency in the Ongoing Professional Practice Evaluation process.

Environment of Care

The OIG noted general safety and privacy measures were in place at the parent Facility. The representative community based outpatient clinic and Nutrition and Food Services generally met the performance indicators evaluated. The OIG did not note any issues with construction safety or with the availability of medical equipment and supplies. However, the OIG identified a deficiency with participation on environment of care rounds.

Medication Management

The OIG found general compliance with requirements for Controlled Substances Coordinator (CSC) reports, pharmacy operations, and pharmacy inspections. However, the OIG found deficiencies with the position descriptions of the CSC and alternate CSC and verification of controlled substance orders.

Women's Health

The OIG noted general compliance with many of the performance indicators reviewed, including scanning hard copy reports, communication of results, and performance of follow-up mammograms if indicated. However, the OIG identified a deficiency with electronically linking mammography results to the order.

Summary

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

Comments

The Veterans Integrated Service Network Director and Facility Director agreed with the Comprehensive Healthcare Inspection Program review findings and recommendations and provided acceptable improvement plans. (See Appendixes E and F, pages 54–55, and the responses within the body of the report for the full text of the Directors’ comments.) The OIG will follow up on the planned actions for the open recommendations until they are completed.

A handwritten signature in blue ink that reads "John D. Daigh, Jr., M.D.".

JOHN D. DAIGH, JR., M.D.
Assistant Inspector General
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Contents

Abbreviations	ii
Report Overview	iii
Results and Review Impact.....	iv
Purpose and Scope	1
Methodology	3
Results and Recommendations	4
Leadership and Organizational Risks.....	4
Quality, Safety, and Value	15
Recommendation 1	17
Credentialing and Privileging	18
Recommendation 2.....	20
Environment of Care	21
Recommendation 3.....	24
Medication Management: Controlled Substances Inspection Program	25
Recommendation 4.....	27
Recommendation 5.....	28
Mental Health Care: Posttraumatic Stress Disorder Care	29
Long-term Care: Geriatric Evaluations	31
Women’s Health: Mammography Results and Follow-Up.....	33
Recommendation 6.....	34
High-Risk Processes: Central Line-Associated Bloodstream Infections	36
Appendix A: Summary Table of Comprehensive Healthcare Inspection Program Review	
Findings.....	38
Appendix B: Facility Profile and VA Outpatient Clinic Profiles	42

Facility Profile.....	42
VA Outpatient Clinic Profiles.....	43
Appendix C: Patient Aligned Care Team Compass Metrics	46
Appendix D: Strategic Analytics for Improvement and Learning (SAIL) Metric Definitions.....	50
Appendix E: VISN Director Comments	54
Appendix F: Interim Facility Director Comments.....	55
OIG Contact and Staff Acknowledgments	56
Report Distribution	57



Purpose and Scope

Purpose

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

Scope

Good leadership makes a difference in managing organizational risks by establishing goals, strategies, and priorities to improve care; setting the quality agenda; and promoting a quality improvement culture to sustain positive change.^{3,4} Investment in a culture of safety and quality improvement with robust communication and leadership is more likely to result in positive patient outcomes in healthcare organizations.⁵ Figure 2 shows the direct relationship leadership and organizational risks have with the processes used to deliver health care to veterans.

To examine risks to patients and the organization when these processes are not performed well, the OIG focused on the following nine areas of clinical care and administrative operations that support quality care—Leadership and Organizational Risks; Quality, Safety, and Value (QSV); Credentialing and Privileging; Environment of Care (EOC); Medication Management; Controlled Substances (CS) Inspection Program; Mental Health: Posttraumatic Stress Disorder (PTSD) Care; Long-Term Care: Geriatric Evaluations; Women’s Health: Mammography Results and Follow-up; and High-Risk Processes: Central Line-Associated Bloodstream Infections (CLABSI) (see Figure 2).⁶

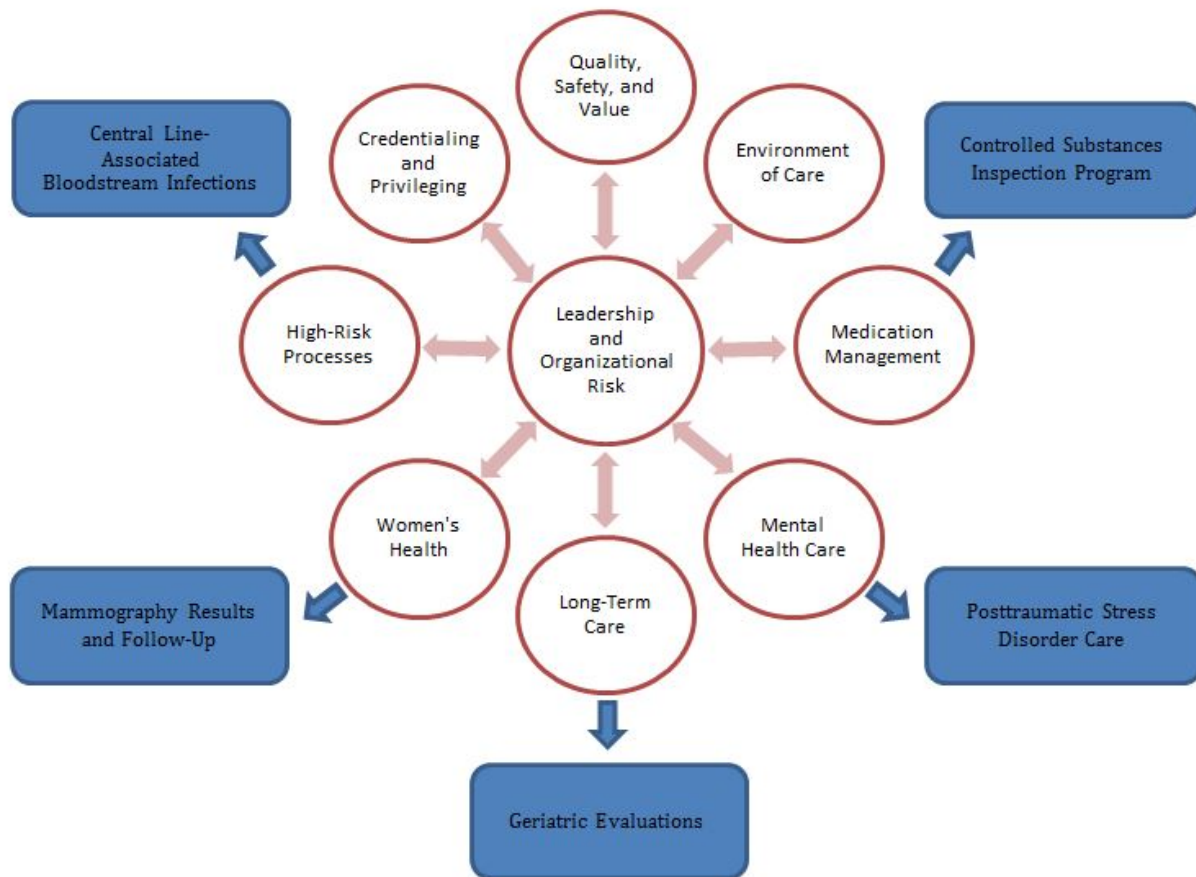
³ Carol Stephenson, “The role of leadership in managing risk,” *Ivey Business Journal*, November/December 2010. <https://iveybusinessjournal.com/publication/the-role-of-leadership-in-managing-risk/>. (Website accessed on March 1, 2018.)

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

⁵ Institute for Healthcare Improvement, “How risk management and patient safety intersect: Strategies to help make it happen,” March 24, 2015. <http://www.npsf.org/blogpost/1158873/211982/How-Risk-Management-and-Patient-Safety-Intersect-Strategies-to-Help-Make-It-Happen>. (Website accessed March 1, 2018.)

⁶ CHIP reviews address these processes during fiscal year (FY) 2018 (October 1, 2017, through September 30, 2018).

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



Source: VA OIG

Additionally, OIG staff provided crime awareness briefings to increase Facility employees' understanding of the potential for VA program fraud and the requirement to report suspected criminal activity to the OIG.

Methodology

To determine compliance with the Veterans Health Administration (VHA) requirements related to patient care quality, clinical functions, and the EOC, the OIG physically inspected selected areas; reviewed clinical records, administrative and performance measure data, and accreditation survey reports;⁷ and discussed processes and validated findings with managers and employees. The OIG interviewed applicable managers and members of the executive leadership team.

The review covered operations for February 9, 2015,⁸ through February 26, 2018, the date when an unannounced week-long site visit commenced. On March 6, 2018, the OIG presented crime awareness briefings to 125 of the Facility's 1,559 employees. These briefings covered procedures for reporting suspected criminal activity to the OIG and included case-specific examples illustrating procurement fraud, conflicts of interest, and bribery.

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

While on site, the OIG received other issues and concerns beyond the scope of the CHIP review, which were referred to our Hotline management team. This resulted in an additional ongoing review. The OIG conducted the inspection in accordance with OIG standard operating procedures for CHIP reviews and *Quality Standards for Inspection and Evaluation* published by the Council of the Inspectors General on Integrity and Efficiency.

⁷ The OIG did not review VHA's internal survey results but focused on OIG inspections and external surveys that affect Facility accreditation status.

⁸ This is the date of the last Combined Assessment Program and/or Community Based Outpatient Clinic and Other Outpatient Clinic reviews.

Results and Recommendations

Leadership and Organizational Risks

Stable and effective leadership is critical to improving care and sustaining meaningful change. Leadership and organizational risks can impact the Facility's ability to provide care in all of the selected clinical areas of focus.⁹ To assess the Facility's risks, the OIG considered the following organizational elements

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

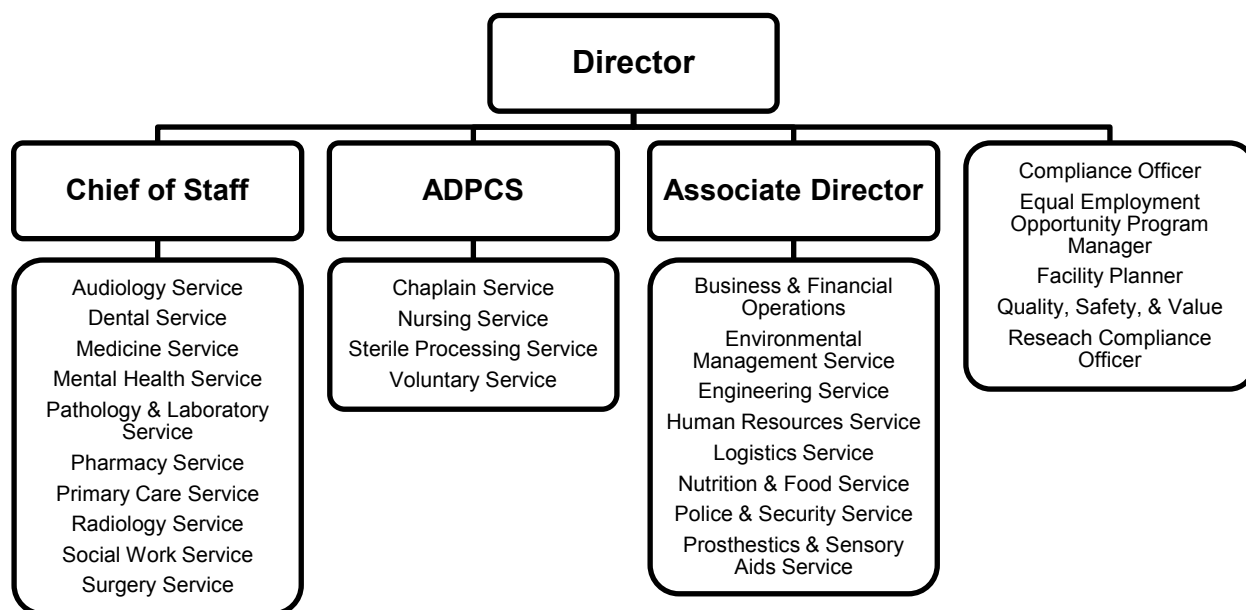
Executive Leadership Stability and Engagement

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

It is important to note that on February 20, 2018, the Associate Director was assigned as Interim Director and the Chief of Engineering as Interim Associate Director. The Chief of Staff and ADPCS were permanently assigned to their positions in December 2012 and December 2014, respectively. The executive leaders had been working together for less than one month at the time of the OIG site visit.

⁹ L. Botwinick, M. Bisognano, and C. Haraden. "Leadership Guide to Patient Safety," *Institute for Healthcare Improvement*, Innovation Series White Paper. 2006.
<http://www.ihl.org/resources/Pages/IHIWhitePapers/LeadershipGuidetoPatientSafetyWhitePaper.aspx>. (Website accessed on February 2, 2017.)

Figure 3. Facility Organizational Chart



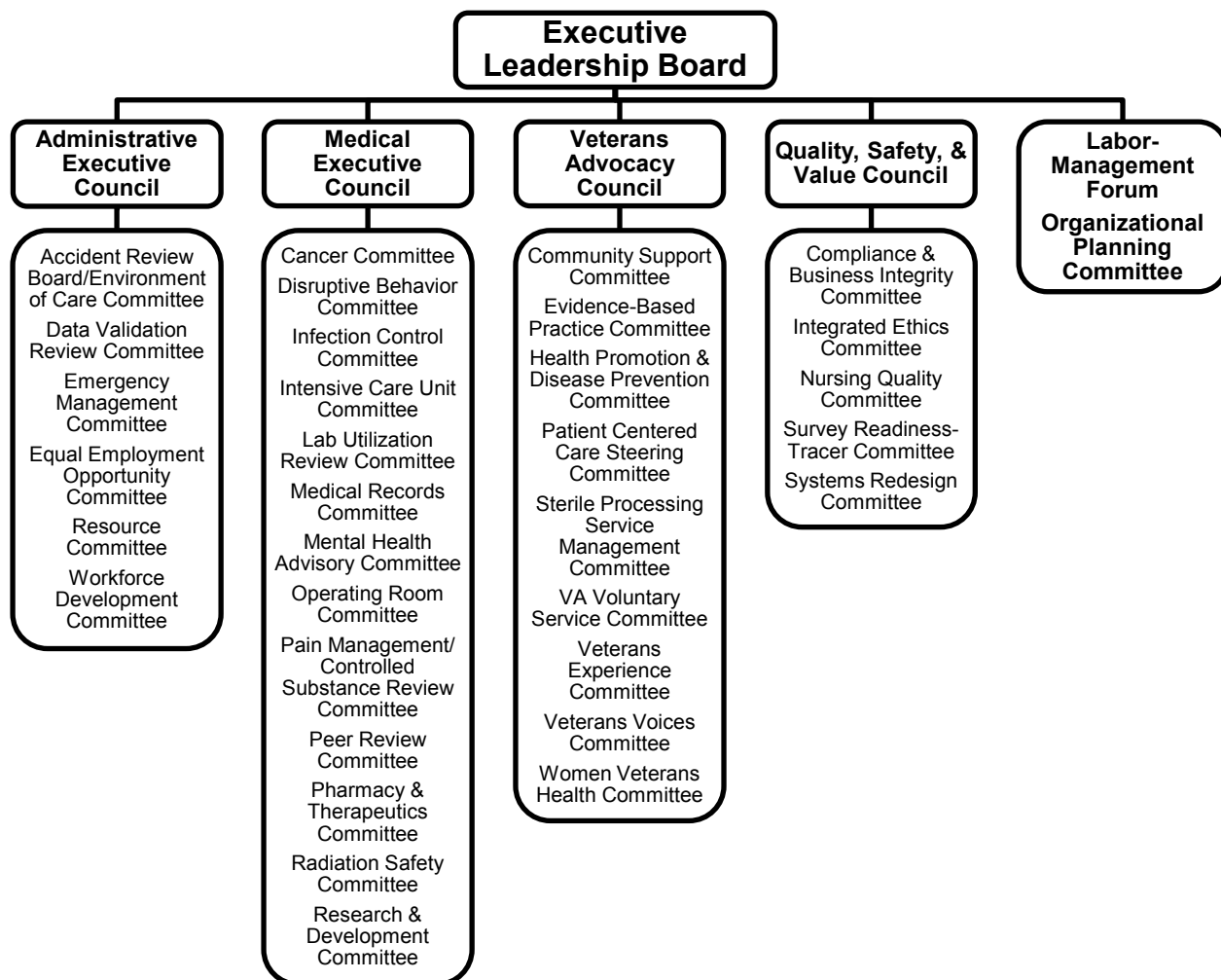
Source: Veterans Health Care System of the Ozarks (received April 26, 2018)

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

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

The leaders are also engaged in monitoring patient safety and care through formal mechanisms. They are members of the Facility's Executive Leadership Board, which tracks, trends, and monitors quality of care and patient outcomes. The Interim Director serves as the chairperson with the authority and responsibility to establish policy, maintain quality care standards, and perform organizational management and strategic planning. The Executive Leadership Board also oversees various working groups, such as the Administrative Executive, Medical Executive, and Quality, Safety, and Value Councils. See Figure 4.

Figure 4. Facility Committee Reporting Structure



Source: Veterans Health Care System of the Ozarks (received February 26, 2018)

Employee Satisfaction and Patient Experience

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

To assess employee and patient attitudes toward Facility leaders, the OIG reviewed employee satisfaction and patient experience survey results that relate to the period of October 1, 2016, through September 30, 2017. Tables 1 and 2 provide relevant survey results for VHA and the Facility. As Table 1 indicates, the Facility leaders' results (Director's office average) were

markedly higher than the VHA and Facility average.¹⁰ In all, employees appear satisfied with the leadership.

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

Questions/Survey Items	Scoring	VHA Average	Facility Average	Director's Office Average ¹¹
All Employee Survey Q59. <i>How satisfied are you with the job being done by the executive leadership where you work?</i>	1 (Very Dissatisfied)–5 (Very Satisfied)	3.3	3.3	4.5
All Employee Survey: <i>Servant Leader Index Composite</i>	0–100 where HIGHER scores are more favorable	67.7	68.2	83.6

Source: VA All Employee Survey (accessed January 26, 2018)

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

VHA collects SHEP survey data from Patient-Centered Medical Home, Specialty Care, and Inpatient Surveys. From these, the OIG selected four survey items that reflect patient attitudes towards Facility leaders. For this Facility, all four patient survey results reflected similar or higher care ratings compared to the VHA average. Patients appear generally satisfied with the leadership and care provided.

¹⁰ The OIG makes no comment on the adequacy of the VHA average for each selected survey element. The VHA average is used for comparison purposes only.

¹¹ Rating is based on responses by employees who report to or are aligned under the Director.

**Table 2. Survey Results on Patient Attitudes toward Facility Leadership
(October 1, 2016, through September 30, 2017)**

Questions	Scoring	VHA Average	Facility Average
Survey of Healthcare Experiences of Patients (inpatient): <i>Would you recommend this hospital to your friends and family?</i>	The response average is the percent of “Definitely Yes” responses.	66.7	73.7
Survey of Healthcare Experiences of Patients (inpatient): <i>I felt like a valued customer.</i>	The response average is the percent of “Agree” and “Strongly Agree” responses.	83.4	85.5
Survey of Healthcare Experiences of Patients (outpatient Patient-Centered Medical Home): <i>I felt like a valued customer.</i>	The response average is the percent of “Agree” and “Strongly Agree” responses.	74.9	74.7
Survey of Healthcare Experiences of Patients (outpatient specialty care): <i>I felt like a valued customer.</i>	The response average is the percent of “Agree” and “Strongly Agree” responses.	75.2	79.2

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

Accreditation/For-Cause Surveys¹² and Oversight Inspections

To further assess Leadership and Organizational Risks, the OIG reviewed recommendations from previous inspections by oversight and accrediting agencies to gauge how well leaders respond to identified problems. Table 3 summarizes the relevant Facility inspections most

¹² The Joint Commission (TJC) conducts for-cause unannounced surveys in response to serious incidents relating to the health and/or safety of patients or staff or reported complaints. The outcomes of these types of activities may affect the current accreditation status of an organization.

recently performed by the OIG and The Joint Commission (TJC).¹³ Indicative of effective leadership, the Facility has closed all recommendations for improvement as listed in Table 3.¹⁴

The OIG also noted the Facility's current accreditation status with the Commission on Accreditation of Rehabilitation Facilities¹⁵ and College of American Pathologists,¹⁶ which demonstrates the Facility leaders' commitment to quality care and services.

Table 3. Office of Inspector General Inspections/Joint Commission Survey

Accreditation or Inspecting Agency	Date of Visit	Number of Findings	Number of Recommendations Remaining Open
OIG (<i>Combined Assessment Program Review of the Veterans Health Care System of the Ozarks, Fayetteville, Arkansas, April 22, 2015</i>)	February 2015	20	0
OIG (<i>Review of Community Based Outpatient Clinics and Other Outpatient Clinics of Veterans Health Care System of the Ozarks, Fayetteville, Arkansas, April 16, 2015</i>)	February 2015	6	0
TJC			
• Regular	April 2017		
○ Hospital Accreditation		25	0
○ Nursing Care Center Accreditation		0	n/a
○ Behavioral Health Care Accreditation		1	0
○ Home Care Accreditation		7	0
• Special Focus Survey ¹⁷	June 2015	2	0

Sources: OIG and TJC (Inspection/survey results verified with the Chief of Quality on February 27, 2018)

¹³ TJC is an internationally accepted external validation that an organization has systems and processes in place to provide safe and quality oriented health care. TJC has been accrediting VHA facilities for more than 30 years. Compliance with TJC standards facilitates risk reduction and performance improvement.

¹⁴ A closed status indicates that the Facility has implemented corrective actions and improvements to address findings and recommendations, not by self-certification, but as determined by the accreditation organization or inspecting agency.

¹⁵ The Commission on Accreditation of Rehabilitation Facilities provides an international, independent, peer review system of accreditation that is widely recognized by Federal agencies. VHA's commitment is supported through a system-wide, long-term joint collaboration with the Commission on Accreditation of Rehabilitation Facilities to achieve and maintain national accreditation for all appropriate VHA rehabilitation programs.

¹⁶ For 70 years, the College of American Pathologists has fostered excellence in laboratories and advanced the practice of pathology and laboratory science. In accordance with VHA Handbook 1106.01, VHA laboratories must meet the requirements of the College of American Pathologists.

¹⁷ TJC conducted special focused surveys of VHA organizations and selected CBOCs from October 2014 to September 2015 at VHA's request in response to whistleblower accounts of improprieties and delays in patient care at the Phoenix VA Health Care System. The Veterans Health Care System of the Ozarks was surveyed as part of this VHA review.

Indicators for Possible Lapses in Care

Within the healthcare field, the primary organizational risk is the potential for patient harm. Many factors impact the risk for patient harm within a system, including unsafe environmental conditions, sterile processing deficiencies, and infection control practices. Leaders must be able to understand and implement plans to minimize patient risk through consistent and reliable data and reporting mechanisms. Table 4 summarizes key indicators of risk since the OIG’s previous February 2015 Combined Assessment Program and Community Based Outpatient Clinic (CBOC) and Other Outpatient Clinics review inspections through the week of February 26, 2018.¹⁸

**Table 4. Summary of Selected Organizational Risk Factors
(February 2015 to February 26, 2018)**

Factor	Number of Occurrences
Sentinel Events ¹⁹	5
Institutional Disclosures ²⁰	5
Large-Scale Disclosures ²¹	0

*Source: Veterans Health Care System of the Ozarks Quality Manager
(received February 28, 2018)*

The OIG also reviewed Patient Safety Indicators developed by the Agency for Healthcare Research and Quality within the U.S. Department of Health and Human Services. These provide information on potential in-hospital complications and adverse events following surgeries and procedures.²² The rates presented are specifically applicable for this Facility, and lower rates

¹⁸ It is difficult to quantify an acceptable number of occurrences because one occurrence is one too many. Efforts should focus on prevention. Sentinel events and those that lead to disclosure can occur in either inpatient or outpatient settings and should be viewed within the context of the complexity of the Facility. (Note that the Veterans Health Care System of the Ozarks is a mid-high complexity (1c) affiliated Facility as described in Appendix B.)

¹⁹ A sentinel event is an incident or condition that results in patient death, permanent harm, severe temporary harm, or intervention required to sustain life.

²⁰ Institutional disclosure of adverse events (sometimes referred to as “administrative disclosure”) is a formal process by which facility leaders together with clinicians and others, as appropriate, inform the patient or his or her personal representative that an adverse event has occurred during care that resulted in, or is reasonably expected to result in, death or serious injury, and provide specific information about the patient’s rights and recourse.

²¹ Large-scale disclosure of adverse events (sometimes referred to as “notification”) is a formal process by which VHA officials assist with coordinating the notification to multiple patients (or their personal representatives) that they may have been affected by an adverse event resulting from a systems issue.

²² Agency for Healthcare Research and Quality website. <https://www.qualityindicators.ahrq.gov/>. (Website accessed on March 8, 2017.)

indicate lower risks. Table 5 summarizes Patient Safety Indicator data from October 1, 2015, through September 30, 2017.

**Table 5. Patient Safety Indicator Data
(October 1, 2015, through September 30, 2017)**

Measure	Reported Rate per 1,000 Hospital Discharges		
	VHA	VISN 16	Facility
Pressure ulcers	0.60	0.73	0.00
Death among surgical inpatients with serious treatable conditions	100.97	85.80	142.86
Iatrogenic pneumothorax	0.19	0.21	0.00
Central venous catheter-related bloodstream infection	0.15	0.14	0.00
In-hospital fall with hip fracture	0.08	0.02	0.00
Perioperative hemorrhage or hematoma	1.94	1.86	0.00
Postoperative acute kidney injury requiring dialysis	0.88	1.00	0.00
Postoperative respiratory failure	5.55	2.65	15.38
Perioperative pulmonary embolism or deep vein thrombosis	3.29	3.61	5.52
Postoperative sepsis	4.00	4.84	0.00
Postoperative wound dehiscence	0.52	0.00	0.00
Unrecognized abdominopelvic accidental puncture/laceration	0.53	0.65	0.00

Source: VHA Support Service Center

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

Three Patient Safety Indicator measures (death among surgical inpatients with serious treatable conditions, postoperative respiratory failure, and perioperative pulmonary embolism or deep vein thrombosis) show a higher observed rate than Veterans Integrated Service Network (VISN) 16 and VHA. This involved three patients.

The first patient met criteria for death among surgical inpatients with serious treatable conditions. The patient had worsening respiratory symptoms after surgery and returned to surgery for the same procedure approximately one week later. Although the patient had some improvement for a period, the patient's condition continued to decline, leading to death.

The second patient met criteria for postoperative respiratory failure. Following surgery, the patient experienced complications and had additional surgeries and ventilator support. The patient improved and was discharged some time later.

The third patient met criteria for deep vein thrombosis. The patient was placed on a ventilator and prophylactic anti-blood clotting medication on admission. The patient had a surgical

procedure and improved slightly. However, the patient's condition began to deteriorate, and a test confirmed the presence of a blood clot. The patient did not survive.

Overall, the individual cases were reviewed by Quality Management or during surgical morbidity and mortality subcommittee meetings, and the Facility indicated no trends or issues were noted that warranted further action.

Veterans Health Administration Performance Data

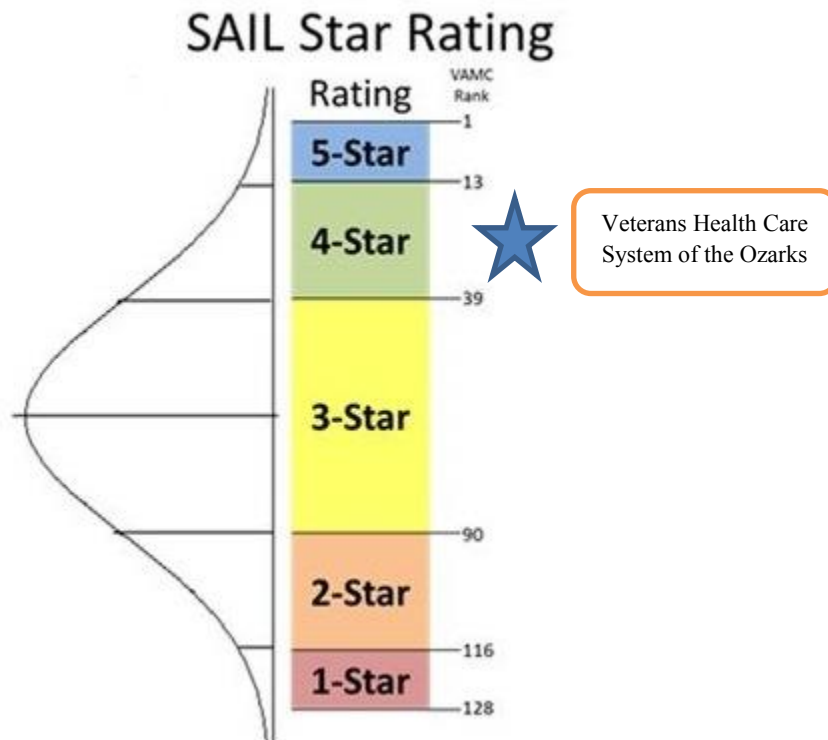
The VA Office of Operational Analytics and Reporting adapted the SAIL Value Model to help define performance expectations within VA. This model includes measures on healthcare quality, employee satisfaction, access to care, and efficiency, but has noted limitations for identifying all areas of clinical risk. The data are presented as one "way to understand the similarities and differences between the top and bottom performers" within VHA.²³

VA also uses a star-rating system where facilities with a "5-Star" rating are performing within the top 10 percent of facilities and "1-Star" facilities are performing within the bottom 10 percent of facilities. Figure 5 describes the distribution of facilities by star rating.²⁴ As of June 30, 2017, the Facility was rated at "4 Star" for overall quality.

²³ VHA Support Service Center (VSSC), The Strategic Analytics for Improvement and Learning (SAIL) Value Model, <http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=2146>. (Website accessed on April 16, 2017.)

²⁴ Based on normal distribution ranking quality domain of 128 VA Medical Centers.

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

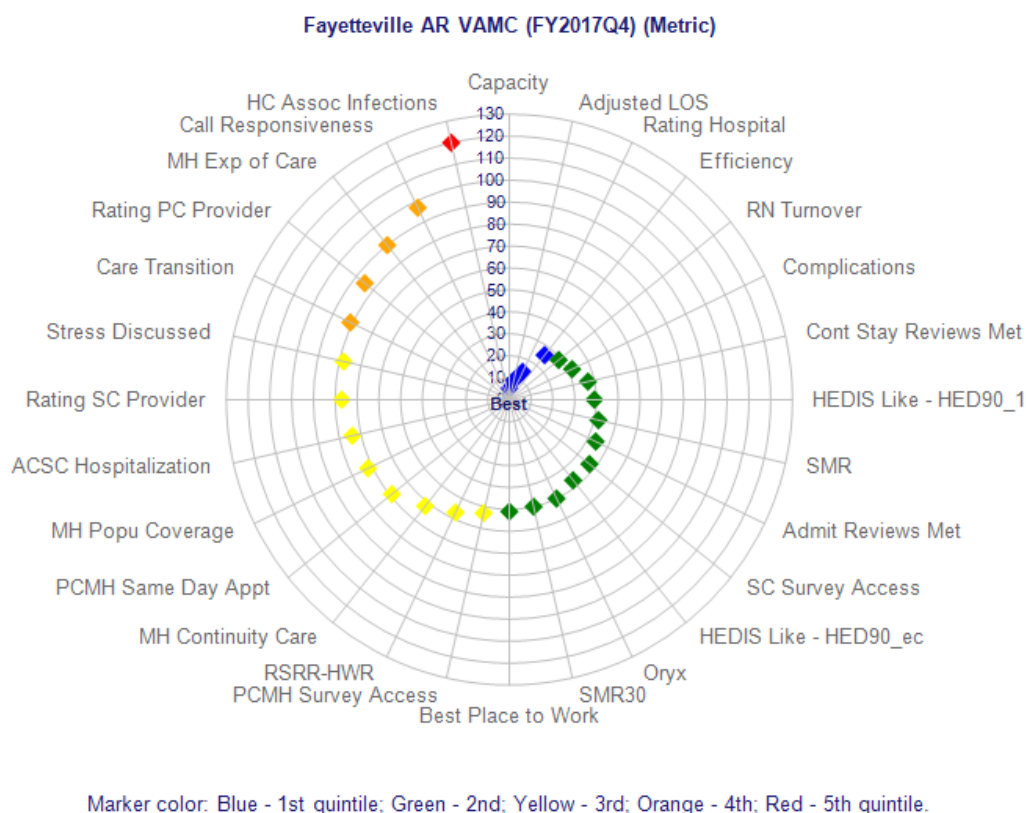


Source: VA Office of Informatics and Analytics Office of Operational Analytics and Reporting (accessed January 26, 2018)

Figure 6 illustrates the Facility's Quality of Care and Efficiency metric rankings and performance compared with other VA facilities as of September 30, 2017. Of note, Figure 6 uses blue and green data points to indicate high performance (for example in the areas of Capacity, Rating (of) Hospital, Registered Nurse (RN) Turnover, Complications, and Best Place to Work).²⁵ Metrics that need improvement are denoted in orange and red (for example, Care Transition, Call Responsiveness, and Healthcare (HC) Associated (Assoc) Infections).

²⁵ For data definitions of acronyms in the SAIL metrics, please see Appendix D.

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



Source: VHA Support Service Center

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

Conclusion

Although two of the Facility's four executive leaders were in interim positions during the OIG's on-site visit, the leaders had worked to support efforts related to patient safety, quality care, and other positive outcomes (such as initiating processes and plans to maintain positive perceptions of the Facility through active stakeholder engagement). The OIG's review of accreditation organization findings, sentinel events, disclosures, Patient Safety Indicator data, and SAIL results did not identify any substantial organizational risk factors. Although the leadership team was knowledgeable about selected SAIL metrics, the leaders should continue to take actions to improve care and performance of selected Quality of Care and Access metrics that are likely contributing to the "4-Star" rating.

Quality, Safety, and Value

VHA's goal is to serve as the nation's leader in delivering high-quality, safe, reliable, and veteran-centered care using a coordinated care continuum. To meet this goal, VHA must foster a culture of integrity and accountability that is vigilant and mindful, proactively risk aware, and predictable, while seeking continuous improvement.²⁶ VHA also strives to provide healthcare services that compare favorably to the best of the private sector in measured outcomes, value, and efficiency.²⁷

VHA requires that its facilities operate a Quality, Safety, and Value (QSV) program to monitor the quality of patient care and performance improvement activities. The purpose of the OIG review was to determine whether the Facility implemented and incorporated selected key functions of VHA's Enterprise Framework for QSV into local activities. To assess this area of focus, the OIG evaluated the following: protected peer reviews of clinical care,²⁸ utilization management (UM) reviews,²⁹ and patient safety incident reporting with related root cause analyses (RCAs).³⁰

VHA has implemented approaches to improving patient safety, including the reporting of patient safety incidents to its National Center of Patient Safety. Incident reporting helps VHA learn about system vulnerabilities and how to address them. Required RCAs help to more accurately identify and rapidly communicate potential and actual causes of harm to patients throughout the organization.³¹

²⁶ VHA Directive 1026; *VHA Enterprise Framework for Quality, Safety, and Value*, August 2, 2013.

²⁷ Department of Veterans Affairs, *Veterans Health Administration Blueprint for Excellence*, September 2014.

²⁸ According to VHA Directive 2010-025 (June 3, 2010), this is a peer evaluation of the care provided by individual providers within a selected episode of care. This also involves a determination of the necessity of specific actions, and confidential communication is given to the providers who were peer reviewed regarding the results and any recommended actions to improve performance. The process may also result in identification of systems and process issues that require special consideration, investigation, and possibly administrative action by facility staff. (Due for recertification June 30, 2015, but has not been updated.)

²⁹ According to VHA Directive 1117, UM reviews evaluate the appropriateness, medical need, and efficiency of healthcare services according to evidence-based criteria.

³⁰ According to VHA Handbook 1050.01, *VHA National Patient Safety Improvement Handbook*, March 4, 2011, VHA has implemented approaches to improve patient safety, including the reporting of patient safety incidents to the VHA National Center for Patient Safety, in order for VHA to learn about system vulnerabilities and how to address them as well as the requirement to implement RCA (a widely-used methodology for dealing with safety-related issues) to allow for more accurate and rapid communication throughout an organization of potential and actual causes of harm to patients.

³¹ VHA Handbook 1050.01.

The OIG interviewed senior managers and key QSV employees and evaluated meeting minutes, protected peer reviews, RCAs, the annual patient safety report, and other relevant documents. Specifically, OIG inspectors evaluated the following performance indicators:³²

- Protected peer reviews
 - Examination of important aspects of care (for example, appropriate and timely ordering of diagnostic tests, prompt treatment, and appropriate documentation)
 - Implementation of improvement actions recommended by the Peer Review Committee
- UM
 - Completion of at least 75 percent of all required inpatient reviews
 - Documentation of at least 75 percent of Physician UM Advisors' decisions in National UM Integration database
 - Interdisciplinary review of UM data
- Patient safety
 - Entry of all reported patient incidents into WebSPOT³³
 - Annual completion of a minimum of eight RCAs³⁴
 - Provision of feedback about RCA actions to reporting employees
 - Submission of annual patient safety report

Conclusion

The OIG found general compliance with requirements for protected peer reviews and patient safety. However, the OIG identified a deficiency with the interdisciplinary review of UM data which warranted a recommendation for improvement.

³² For CHIP reviews, the OIG selects performance indicators based on VHA or regulatory requirements or accreditation standards and evaluates these for compliance.

³³ WebSPOT is the software application used for reporting and documenting adverse events in the VHA (National Center for Patient Safety) Patient Safety Information System database.

³⁴ According to VHA Handbook 1050.01, March 4, 2011, the requirement for a total of eight RCAs and aggregated reviews is a minimum number, as the total number of RCAs is driven by the events that occur and the Safety Assessment Code (SAC) score assigned to them. At least four analyses per fiscal year must be individual RCAs, with the balance being aggregated reviews or additional individual RCAs.

Utilization Management: Data Review

VHA requires that an interdisciplinary Facility group review UM data.³⁵ This group must include but not be limited to, representatives from UM, medicine, nursing, social work, case management, MH, and Chief Business Office Revenue Utilization Review (CBO–UR). An interdisciplinary review ensures that a comprehensive approach is taken when reviewing UM data to identify areas for improvement throughout the Facility. From October 2016 through January 2018, four of the seven required interdisciplinary staff did not consistently attend meetings.³⁶ This resulted in a lack of expertise in the review and analysis of UM data. Facility managers stated they were unaware of the requirements for the review of UM data.

Recommendation 1

1. The Chief of Staff ensures that an interdisciplinary Facility group review Utilization Management data and monitors compliance.

Facility concurred.

Target date for completion: September 1, 2018

Facility response: Quality Management Staff completed a review of the VHA Directive 1117(1), Utilization Management Program to verify required attendance for review of UM data, ensuring UM data is reviewed on an ongoing basis by an interdisciplinary group including but not limited to representatives from: UM, Medicine, Surgery, Mental Health, Nursing, Social Work, and CBO-R-UR Business Office). Quality Management Staff conducted a review of VHA Directive 1026, VHA ENTERPRISE FRAMEWORK FOR QUALITY, SAFETY, AND VALUE, to clarify and validate required reporting members for the Quality, Safety and Value Committee where the UM data is reported. QSV attendance roster was updated May 1, 2018 to reflect the required members by role and service. This attendance requirement was communicated to committee members of their required attendance during the May 2018 QSV meeting. If unable to attend they are required to send a delegate. Expected compliance rate is 100% for required attendance and will be monitored until 3 consecutive months of compliance.

³⁵ VHA Directive 1117.

³⁶ Medicine, MH, social work, and CBO-UR.

Credentialing and Privileging

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

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

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

The purpose of the OIG review was to determine whether the Facility complied with selected requirements for credentialing and privileging of selected members of the medical staff. The OIG team interviewed key managers and reviewed the credentialing and privileging folders of 10 LIPs who were hired within 18 months prior to the on-site visit,⁴⁰ and 20 LIPs who were re-privileged within 12 months prior to the visit.⁴¹ The OIG evaluated the following performance indicators:

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

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

³⁸ VHA Handbook 1100.19.

³⁹ VHA Handbook 1100.19.

⁴⁰ The 18-month period was from August 27, 2016, through February 26, 2018.

⁴¹ The 12-month review period was from February 27, 2017, through February 26, 2018.

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

Conclusion

The OIG found general compliance with requirements for credentialing and FPPEs. However, the OIG identified a deficiency in OPPE processes.

Ongoing Professional Practice Evaluation

VHA requires that at the time of re-privileging, Service Chiefs consider relevant service- and practitioner-specific data utilizing defined criteria when recommending the continuation of licensed independent practitioners' privileges to the Executive Committee of the Medical Staff.⁴² Such data is maintained in the provider profile and may include direct observations, clinical discussions, and clinical record reviews. The OPPE process is essential to confirm the quality of

⁴² VHA Handbook 1100.19.

care delivered and allows the Facility to identify professional practice trends that impact the quality of care and patient safety.

For 6 of 20 provider profiles used to support the renewal of practitioners' privileges, there was no evidence of complete service-specific data collection, resulting in providers continuing to deliver care without a thorough evaluation of their practice. Clinical leaders cited lack of attention to details and inadequate administrative staffing support and turnover in clinical leadership positions as reasons for noncompliance.

Recommendation 2

2. The Chief of Staff ensures that Service Chiefs consistently collect and review Ongoing Professional Practice Evaluation data and monitors compliance.

Facility concurred.

Target date for completion: November 1, 2018

Facility response: Quality Management Staff will monitor compliance for OPPE data collection until there is 100% compliance for 3 consecutive months. Monthly compliance will be reported to the MEC and QSV committees monthly. Once compliance is achieved, QM Staff will continue to monitor by conducting random quality checks and reporting compliance data to MEC and QSV meetings with a quarterly frequency.

Training sessions were held during the week of April 30, 2018, for individual services, service chiefs and their respective administrative staff to discuss expectations for OPPE data collection. The training also informed impacted service chiefs that the OPPE data will be collected throughout the year, with one-on-one review of the findings between the provider and service chief. Signatures will be obtained on the OPPE forms every six months. OPPE forms were updated and approved through the PSB committee, to reflect more practice specific criteria and triggers that would indicate the need for a FPPE.

Environment of Care

Any medical center, regardless of its size or location, faces vulnerabilities in the healthcare environment. VHA requires managers to conduct EOC inspection rounds and resolve issues in a timely manner. The goal of the EOC program is to reduce and control environmental hazards and risks; prevent accidents and injuries; and maintain safe conditions for patients, visitors, and staff. The physical environment of a healthcare organization must not only be functional but should also promote healing.⁴³

The purpose of the OIG review was to determine whether the Facility maintained a clean and safe healthcare environment in accordance with applicable requirements.⁴⁴ The OIG also determined whether the Facility met requirements in selected areas that are often associated with higher risks of harm to patients, in this case with a special emphasis on construction safety⁴⁵ and Nutrition and Food Services processes.⁴⁶

VHA requires a safe and healthy worksite for staff, patients, and the general public during construction and renovation-related activities. The implementation of a proactive and comprehensive construction safety program reduces the potential for injury, illness, accidents, or exposures.⁴⁷

The Nutrition and Food Services Program must provide quality meals that meet the regulatory requirements for food safety in accordance with the U.S. Food and Drug Administration's Food Code and VHA's food safety program. Facilities must have a hazard analysis critical control point food safety plan, food services inspections, a food service emergency operations plan, and safe food transportation and storage practices.⁴⁸

In all, the OIG team inspected six inpatient units (intensive care, 2A and 2B-medical/surgical, Palliative Care, inpatient MH, and post-anesthesia care/pre-operative holding); the Emergency Department; a primary care, physical therapy/prosthetics, dental, and Women's Health clinics; and Nutrition and Food Service. The team also inspected the Ozark CBOC⁴⁹ and two

⁴³ VHA Directive 1608, *Comprehensive Environment of Care*, February 1, 2016.

⁴⁴ Applicable requirements include various VHA Directives, Joint Commission hospital accreditation standards, Occupational Safety and Health Administration, American National Standards Institute (ANSI)/Association for the Advancement of Medical Instrumentation (AAMI), and National Fire Protection Association (NFPA).

⁴⁵ VHA Directive 7715, *Safety and Health during Construction*, April 6, 2017.

⁴⁶ VHA Handbook 1109.04, *Food Service Management Program*, October 11, 2013.

⁴⁷ VHA Directive 7715.

⁴⁸ VHA Handbook 1109.04.

⁴⁹ Each outpatient site selected for physical inspection was randomized from all primary care CBOCs, multi-specialty CBOCs, and healthcare centers reporting to the parent Facility and was operational and classified as such in VA's Site Tracking Database by August 15, 2017.

construction sites.⁵⁰ The OIG reviewed the most recent Infection Prevention Risk Assessment, Infection Control Committee minutes for the past six months, and other relevant documents, and interviewed key employees and managers. The OIG evaluated the following location-specific performance indicators:

- Parent Facility
 - EOC rounds
 - EOC deficiency tracking
 - Infection prevention
 - General safety
 - Environmental cleanliness
 - General privacy
 - Women veterans' exam room privacy
 - Availability of medical equipment and supplies
- Community Based Outpatient Clinic
 - General safety
 - Medication safety and security
 - Infection prevention
 - Environmental cleanliness
 - General privacy
 - Exam room privacy
 - Availability of medical equipment and supplies
- Construction Safety
 - Completion of infection control risk assessment for all sites
 - Infection Prevention/Infection Control Committee discussions on construction activities
 - Dust control
 - Safety and security

⁵⁰ Renovation of the Step-Down/Telemetry Unit and construction of the new ante-room/entrance to the surgical suite.

- Selected requirements based on project type and class⁵¹
- Nutrition and Food Services
 - Hazard Analysis Critical Control Point Food Safety System plan
 - Food Services inspections
 - Emergency operations plan for food service
 - Safe transportation of prepared food
 - Environmental safety
 - Infection prevention
 - Storage areas

Conclusion

General safety and privacy measures were in place at the parent Facility. The representative CBOC and Nutrition and Food Services generally met the performance indicators evaluated. The OIG did not note any issues with construction safety or with the availability of medical equipment and supplies. The OIG identified a deficiency in EOC rounds attendance that warranted a recommendation for improvement.

Parent Facility's Environment of Care Rounds Attendance

VHA requires facilities to perform comprehensive EOC rounds with a designated team that includes specific membership to ensure a safe, clean, and high-quality care environment. Core membership is composed of representatives from programmatic areas such as nursing, infection control, patient safety, and medical equipment management to ensure adherence to various program requirements.⁵²

From October 1, 2016, through September 30, 2017, the OIG found that 2 of 13 required EOC team members did not consistently attend rounds. This resulted in a lack of subject matter experts on EOC rounds. Facility managers stated they were aware of the noncompliance; however, due to staffing issues and other priorities, they failed to take follow-up actions to ensure compliance.

⁵¹ VA Master Construction Specifications, Section 01-35-26, Sub-Section 1.12. The Type assigned to construction work ranges from Type A (non-invasive activities) to Type D (major demolition and construction). Type C construction involves work that generates a moderate to high level of dust or requires demolition or removal of any fixed building components or assemblies. The Class assigned to construction work ranges from Class I (low-risk groups affected) to Class IV (highest risk groups affected). Class III construction projects affect patients in high-risk areas such as the Emergency Department, inpatient medical and surgical units, and the pharmacy.

⁵² VHA Directive 1608.

Recommendation 3

3. The Associate Director ensures required team members consistently participate on environment of care rounds and monitors compliance.

Facility concurred.

Target date for completion: December 1, 2018

Facility response: The importance of attendance will be emphasized in EOCC during the monthly August meeting. Attendance reports will be added to the EOC rounds and those reports will filter up to EOCC. Extra diligence will be taken by the EOC rounds coordinator to ensure proper team member inspection assignments are occurring. This will be an ongoing monitor in EOCC, and will come up to QSV for no less than 12 months at least quarterly for OIG action review with a benchmark of attendance 90% for all required attendees.

Medication Management: Controlled Substances Inspection Program

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusion

The OIG found general compliance with requirements for CSC reports, pharmacy operations, and pharmacy inspections. However, the OIG identified deficiencies with CSC and Alternate CSC position descriptions and inspections of randomly selected dispensing activities.

Controlled Substances Coordinator Job Descriptions

VHA requires that CSC and Alternate CSC duties must be included in the employee's position description or functional statement.⁶¹ These duties may be added as an addendum to the position description. The OIG found that the controlled substance duties were not listed in the position descriptions or added as an addendum. This resulted in potential unclear communication of assigned CSC duties. Facility managers admitted to a lack of oversight.

Recommendation 4

4. The Facility Director ensures that the duties of the controlled substance coordinator and alternate controlled substance coordinator are included in the employees' position descriptions or functional statements and monitors compliance.

Facility concurred.

Target date for completion: September 1, 2018

Facility response: The duties were added to the controlled substance coordinator in March 2018 and alternates controlled substance coordinator's position description in July 2018. QSV will monitor as needed when and if there are changes to the person assigned to the role. Compliance is expected to be 100%.

Verification of Controlled Substances Orders

VHA requires that CSIs verify during CS area inspections that there is evidence of a written or electronic CS order for a prescribed number of randomly selected patients.⁶² The OIG did not

⁶¹ VHA Directive 1108.02(1).

⁶² VHA Directive 1108.02(1).

find evidence that CSIs consistently verified orders for CS in any of the 10 areas reviewed.⁶³ This resulted in a potential vulnerability in the accountability for CS. Facility managers stated that the competing demands of a full-time position and collateral CSC duties did not provide the CSC sufficient time to verify and complete the dispensing activity review.

Recommendation 5

5. The Facility Director ensures controlled substance inspectors complete controlled substance order verifications and monitors compliance.

Facility concurred.

Target date for completion: December 15, 2018

Facility response: An SOP will be developed by August 31, 2018, to clearly define the process for the completion of controlled substance order verifications in inpatient and outpatient areas. The controlled substance order verification audits will be monitored by the Controlled Substance Coordinator (CSC) and presented to the QSV committee monthly until 3 consecutive months of compliance (90%) is achieved. The CSC will develop and implement a training plan for the CS Inspectors. One hundred percent of CS Inspectors will be trained for compliance by September 30, 2018. The training plan and staff training records will be reviewed for compliance in the QSV Committee meeting during the October 2018.

⁶³ The OIG found documentation that this activity was conducted in two inpatient units for three of six months, the intensive care unit for one of six months, and the Emergency Department for two of six months.

Mental Health Care: Posttraumatic Stress Disorder Care

Posttraumatic Stress Disorder (PTSD) may occur “following exposure to an extreme traumatic stressor involving direct personal experience of an event that involves actual or threatened death or serious injury; other threat to one’s physical integrity; witnessing an event that involves death, injury, or threat to the physical integrity of another person; learning about unexpected or violent death, serious harm, threat of death or injury experienced by a family member or other close associate.”⁶⁴ For veterans, the most common traumatic stressor contributing to a PTSD diagnosis is war-zone related stress. Non-war zone military experiences, such as the crash of a military aircraft, may also contribute to the development of PTSD.⁶⁵

The PTSD screen is performed through a required national clinical reminder and is triggered for completion when the patient has his or her first visit at a VHA medical facility. The reminder typically remains active until it is completed.⁶⁶ VHA requires that

1. PTSD screening is performed for every new patient and then is repeated every year for the first five years post-separation and every five years thereafter, unless there is a clinical need to re-screen earlier;
2. If the patient’s PTSD screen is positive, an acceptable provider must evaluate treatment needs and assess for suicide risk; and
3. If the provider determines a need for treatment, there is evidence of referral and coordination of care.⁶⁷

To assess whether the Facility complied with the requirements related to PTSD screening, diagnostic evaluation, and referral to specialty care, the OIG team reviewed relevant documents and interviewed key employees and managers. Additionally, the OIG reviewed the electronic health records (EHR) of 40 randomly selected outpatients who had a positive PTSD screen from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

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

⁶⁴ VHA Handbook 1160.03, *Programs for Veterans with Post-Traumatic Stress Disorder (PTSD)*, March 12, 2010. (rescinded November 16, 2017).

⁶⁵ VHA Handbook 1160.03.

⁶⁶ A PTSD screen is not required if the patient received a PTSD diagnosis in outpatient setting in the past year; has a life expectancy of 6 months or less; has severe cognitive impairment, including dementia; is enrolled in a VHA or community-based hospice program; or has a diagnosis of cancer of the liver, pancreas, or esophagus.

⁶⁷ Department of Veterans Affairs, Information Bulletin, *Clarification of Posttraumatic Stress Disorder Screening Requirements*, August 6, 2015.

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

Conclusion

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

Long-term Care: Geriatric Evaluations

More than nine million veterans of all ages are enrolled with VA, and 46 percent of these veterans are age 65 and over.⁶⁸ As a group, veterans experience more chronic disease and disability than their non-veteran peers. VA must plan for the growing health demands by aging veterans and to have mechanisms in place for delivering those services in an appropriate and cost-effective manner.⁶⁹ Participants in geriatric evaluation (GE) programs have been shown to be significantly less likely to lose functional ability, experience health-related restrictions in their daily activities, or use home healthcare services.⁷⁰

In 1999, the Veterans Millennium Benefits and Healthcare Act mandated that the veterans' standard benefits package include access to GE.⁷¹ This includes a comprehensive, multidimensional assessment and the development of an interdisciplinary plan of care. The healthcare team would then manage the patient with treatment, rehabilitation, health promotion, and social service interventions necessary for fulfillment of the plan of care by key personnel.⁷² Facility leaders must also evaluate the GE program through a review of program objectives, procedures for monitoring care processes and outcomes, and analyses of findings.⁷³

In determining whether the Facility provided an effective geriatric evaluation, OIG staff reviewed relevant documents and interviewed key employees and managers. Additionally, the team reviewed the EHRs of 48 randomly selected patients who received a GE from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

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

⁶⁸ VHA Directive 1140.04, *Geriatric Evaluation*, November 28, 2017.

⁶⁹ VHA Directive 1140.04.

⁷⁰ Chad Boulton, Lisa B. Boulton, Lynne Morishita, Bryan Dowd, Robert L. Kane, and Cristina F. Urdangarin, "A randomized clinical trial of outpatient geriatric evaluation and management," *Journal of the American Geriatrics Society* 49, no. 4 (April 2001): 351–359.

⁷¹ Public Law 106-117.

⁷² VHA Directive 1140.11, *Uniform Geriatrics and Extended Care Services in VA Medical Centers and Clinics*, October 11, 2016.

⁷³ VHA Directive 1140.04.

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

Conclusion

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

Women's Health: Mammography Results and Follow-Up

In 2017, an estimated 252,710 new cases of invasive breast cancer and 40,610 breast cancer deaths were expected to occur among US women.⁷⁴ Timely screening, diagnosis, notification, and treatment are essential to early detection and optimal patient outcomes.

The Veterans Health Care Amendments of 1983 mandated VA provide veterans with preventive care, including breast cancer screening.⁷⁵ The Veterans Health Care Act of 1992 also authorized VA to provide gender-specific services, including mammography services to eligible women veterans.⁷⁶

VHA has established timeframes for clinicians to notify ordering providers and patients of mammography results. "Incomplete" and "probably benign" results must be communicated to the ordering provider within 30 days of the procedure and to the patient within 14 calendar days from the date the results are available to the ordering provider. "Suspicious" and "highly suggestive of malignancy" results must be communicated to the ordering provider within three business days of the procedure, and the recommended course of action should be communicated to the patient as soon as possible, with seven calendar days representing the outer acceptable limit. Verbal communication with patients must be documented.⁷⁷

The OIG team examined whether the Facility complied with selected VHA requirements for the reporting of mammography results by reviewing relevant documents and interviewing selected employees and managers. The team also reviewed the EHRs of 38 randomly selected women veteran patients who received a mammogram from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

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

⁷⁴ U.S. Breast Cancer Statistics. <http://www.BreastCancer.org>. (Website accessed on May 18, 2017.)

⁷⁵ Veterans Health Care Amendments of 1983, Pub. L. 98-160 (1983).

⁷⁶ Veterans Health Care Act of 1992, Title I, Pub. L. 102-585 (1992).

⁷⁷ VHA Directive 1330.01(2), *Health Care Services for Women Veterans*, February 15, 2017 (amended September 8, 2017, and further amended July 24, 2018); VHA Handbook 1105.03, *Mammography Program Procedures and Standards*, April 28, 2011, which was rescinded and replaced by VHA Directive 1105.03, *Mammography Program Procedures and Standards*, May 21, 2018.

- Performance of follow-up mammogram if indicated
- Performance of follow-up study⁷⁸

Conclusion

Generally, the OIG noted compliance with requirements for scanning hard copy reports, communication of results to the ordering providers and patients, and performance of follow-up mammograms if indicated. However, the OIG identified a deficiency with electronically linking mammography results to the order.

Electronic Linking of Mammogram Results to Radiology Order

VHA requires that all mammography results, regardless of where the procedure(s) are performed, be entered into Veterans Health Information Systems and Technology Architecture (VistA) and associated to the radiology order.⁷⁹ Systems for tracking and management of mammography results and breast cancer will not operate accurately without BI-RADS entered into CPRS and associated to a radiology order. This also ensures accurate reporting of data for use in program improvement, compliance, and oversight activities.

The OIG team estimated that the Facility linked mammography results to the radiology order in 55 percent of the EHRs reviewed. The OIG is 95 percent confident that the true rate is between 39.6 and 71.2 percent, which the OIG determined is statistically significantly below the 90 percent benchmark. Failing to link the mammography results to the radiology order could result in increased difficulty in tracking patients with breast cancer and managing follow-up care. The current Chief of Radiology could not provide a reason for noncompliance related to previous service-level practices but acknowledged identifying this issue after assuming the position in March 2017 and taking actions to correct the deficiency.

Recommendation 6

6. The Chief of Staff ensures staff link the mammography results to the radiology order and monitors compliance.

Facility concurred.

Target date for completion: January 1, 2019

Facility Response: The two trained/assigned radiology staff review the spreadsheet weekly to review the orders entered and ensure that results have been attached for review by the provider. Radiology will report to QSV committee monthly for four months the number of orders entered,

⁷⁸ This performance indicator did not apply to this Facility.

⁷⁹ VHA Handbook 1105.03.

the number of results that linked to the orders correctly as well as the date of entry for oldest consult being reported. Compliance benchmark will be 100%. If there any outliers, details will be discussed as to cause and if patient outcome was affected. If no compliance issues are identified within that time frame, reporting will go to quarterly for 6 months at which time if no issues identified, QSV will discuss future reporting.

High-Risk Processes: Central Line-Associated Bloodstream Infections

TJC requires facilities to establish systematic infection prevention and control programs to reduce the risk of acquiring and transmitting infections.⁸⁰ Central lines “refer to a broad category of intravascular (within blood vessels) devices used to administer fluids, medications, blood and blood products, and parenteral nutrition. Unlike the short, temporary catheters inserted into the peripheral vasculature,”⁸¹ central lines are threaded through a vein in the arm, chest, neck, or groin and advanced so that the furthest tip terminates at or close to the heart or in one of the great vessels.⁸²

The use of central lines has greatly facilitated the care provided to patients; however, they are not without their risks. The Centers for Disease Control and Prevention defines a central line-associated bloodstream infection (CLABSI) as a “primary bloodstream infection that develops in a patient with a central line in place. This type of infection occurs within the 48 hours of insertion and is not related to infection at another site.”⁸³

Infections occurring on or after the third calendar day following admission to an inpatient location are considered “healthcare-associated.”⁸⁴ The patient’s age, underlying conditions, and gender are basic risk factors, but external risk factors such as prolonged hospitalization, multi-lumen central lines, and central line duration far outnumber the basic ones. External factors are associated with a 2.27-fold increased risk for mortality and increased healthcare costs.⁸⁵

The OIG’s review of these issues examined whether the Facility established and maintained programs to reduce the incidence of healthcare-associated bloodstream infections in intensive care unit patients with indwelling central lines. In addition to conducting manager and staff interviews, the OIG team reviewed committee minutes, the Infection Prevention/Control Risk Assessment, and other relevant documents. The team also reviewed the training records of 26 clinical employees involved in inserting and/or managing central lines. The OIG evaluated the following performance indicators:

- Presence of Facility policy on the use and care of central lines

⁸⁰ TJC. Infection Control and National Patient Safety Goals: IC.01.03.01, EP 4, 5, July 2017.

⁸¹ Association for Professionals in Infection Control and Epidemiology, *Guide to Preventing Central Line-Associated Bloodstream Infections*, 2015.

⁸² These are vessels that enter and leave the heart—superior and inferior vena cava, pulmonary artery, pulmonary vein, aorta.

⁸³ The Centers for Disease Control and Prevention, *Guidelines for the Prevention of Intravascular Catheter-Related Infections*, 2011.

⁸⁴ The Centers for Disease Control and Prevention National Healthcare Safety Network, *Bloodstream Infection Event: Central Line-Associated Bloodstream Infection and non-central line-associated Bloodstream Infection*, January 2017.

⁸⁵ Association for Professionals in Infection Control and Epidemiology, 2015.

- Performance of annual infection prevention risk assessment
- Evidence of routine discussion of CLABSI data and prevention outcome measures in committee minutes
- Provision of infection incidence data on CLABSI
- Education on reducing the risk of CLABSI for staff involved in inserting and/or managing central lines
- Educational materials about CLABSI prevention for patients and families
- Use of a checklist for central line insertion and maintenance

Conclusion

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

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

Healthcare Processes	Performance Indicators	Conclusion
Leadership and Organizational Risks	<ul style="list-style-type: none">Executive leadership stability and engagementEmployee satisfaction and patient experienceAccreditation/for-cause surveys and oversight inspectionsIndicators for possible lapses in careVHA performance data	Six OIG recommendations, ranging from documentation issues to deficiencies that can lead to patient and staff safety issues or adverse events, are attributable to the Interim Director, Chief of Staff, and Interim Associate Director. See details below.

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Quality, Safety, and Value	<ul style="list-style-type: none">Protected peer review of clinical careUM reviewsPatient safety incident reporting and RCAs	<ul style="list-style-type: none">None	<ul style="list-style-type: none">The interdisciplinary group reviews UM data.
Credentialing and Privileging	<ul style="list-style-type: none">Medical licensesPrivilegesFPPEsOPPEs	<ul style="list-style-type: none">Service Chiefs consistently collect and review Ongoing Professional Practice Evaluation data.	<ul style="list-style-type: none">None

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Environment of Care	<ul style="list-style-type: none"> • Parent Facility <ul style="list-style-type: none"> ○ EOC rounds and deficiency tracking ○ Infection prevention ○ General safety ○ Environmental cleanliness ○ General and exam room privacy ○ Availability of medical equipment and supplies • CBOC <ul style="list-style-type: none"> ○ General safety ○ Medication safety and security ○ Infection prevention ○ Environmental cleanliness ○ General and exam room privacy ○ Availability of medical equipment and supplies • Construction Safety <ul style="list-style-type: none"> ○ Infection control risk assessment ○ Infection Prevention/Infection Control Committee discussions ○ Dust control ○ Safety/security ○ Selected requirements based on project type and class • Nutrition and Food Services <ul style="list-style-type: none"> ○ Hazard Analysis Critical Control Point Food Safety System plan ○ Food Services inspections ○ Safe transportation of prepared food ○ Environmental safety ○ Infection prevention ○ Storage areas 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Required team members consistently participate on EOC rounds.

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Medication Management	<ul style="list-style-type: none"> • CSC reports • Pharmacy operations • Annual physical security survey • CS ordering processes • Inventory completion during Chief of Pharmacy transition • Review of balance adjustments • CSC requirements • CSI requirements • CS area inspections • Pharmacy inspections 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • The duties of the CSC and alternate CSC are included in the employees' position descriptions or functional statements. • CSIs complete CS order verification.
Mental Health Care: Posttraumatic Stress Disorder Care	<ul style="list-style-type: none"> • Suicide risk assessment • Offer of further diagnostic evaluation • Referral for diagnostic evaluation • Completion of diagnostic evaluation 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None
Long-Term Care: Geriatric Evaluations	<ul style="list-style-type: none"> • Provision of or access to GE • Program oversight and evaluation • Provision of clinical care • Geriatric management 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None
Women's Health: Mammography Results and Follow-Up	<ul style="list-style-type: none"> • Result linking • Report scanning and content • Communication of results and recommended actions • Follow-up mammograms and studies 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Staff link the mammography results to the radiology order.
High-Risk Processes: Central Line-Associated Bloodstream Infections	<ul style="list-style-type: none"> • Policy and infection prevention risk assessment • Committee discussion • Infection incidence data • Education and educational materials 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
	<ul style="list-style-type: none">• Policy, procedure, and checklist for insertion and maintenance of central venous catheters		

Appendix B: Facility Profile and VA Outpatient Clinic Profiles

Facility Profile

The table below provides general background information for this mid-high complexity (1c)⁸⁶ affiliated⁸⁷ Facility reporting to VISN 16.

**Table 6. Facility Profile for Main Facility Fayetteville (564)
(October 1, 2014, through September 30, 2017)**

Profile Element	Facility Data FY 2015 ⁸⁸	Facility Data FY 2016 ⁸⁹	Facility Data FY 2017 ⁹⁰
Total Medical Care Budget in Millions	\$300.1	\$305.8	\$312.8
Number of:			
• Unique Patients	54,586	53,890	53,681
• Outpatient Visits	589,430	581,525	582,318
• Unique Employees ⁹¹	1,280	1,228	1,208
Type and Number of Operating Beds:			
• Intermediate	10	2	2
• Medicine	41	41	30
• Mental Health	15	15	15
• Surgery	7	5	5
Average Daily Census:			
• Intermediate	1	1	1
• Medicine	30	23	19
• Mental Health	10	10	12
• Surgery	4	3	2

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

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

⁸⁶ The VHA medical centers are classified according to a facility complexity model; 1c designation indicates a Facility with medium-high volume, medium-risk patients, some complex clinical programs, and medium-sized research and teaching programs.

⁸⁷ Associated with a medical residency program.

⁸⁸ October 1, 2014, through September 30, 2015.

⁸⁹ October 1, 2015, through September 30, 2016.

⁹⁰ October 1, 2016, through September 30, 2017.

⁹¹ Unique employees involved in direct medical care (cost center 8200).

VA Outpatient Clinic Profiles⁹²

The VA outpatient clinics in communities within the catchment area of the Facility provide PC integrated with women's health, MH, and telehealth services. Some also provide specialty care, diagnostic, and ancillary services. Table 7 provides information relative to each of the clinics.

Table 7. VA Outpatient Clinic Workload/Encounters⁹³ and Specialty Care, Diagnostic, and Ancillary Services Provided (October 1, 2016, through September 30, 2017)

Location	Station No.	PC Workload/ Encounters	MH Workload/ Encounters	Specialty Care Services ⁹⁴ Provided	Diagnostic Services ⁹⁵ Provided	Ancillary Services ⁹⁶ Provided
Branson, MO	564GC	11,290	5,506	Cardiology Dermatology Endocrinology Infectious Disease Poly-Trauma Eye General Surgery Urology	EKG Laboratory and Pathology Radiology	Nutrition Pharmacy Weight Management

⁹² Includes all outpatient clinics in the community that were in operation as of August 15, 2017. The OIG omitted Fayetteville, AR, (564QA) and Fayetteville, AR (564QB), as no workload/encounters or services were reported.

⁹³ An encounter is a professional contact between a patient and a practitioner vested with responsibility for diagnosing, evaluating, and treating the patient's condition.

⁹⁴ Specialty care services refer to non-PC and non-MH services provided by a physician.

⁹⁵ Diagnostic services include EKG, EMG, laboratory, nuclear medicine, radiology, and vascular lab services.

⁹⁶ Ancillary services include chiropractic, dental, nutrition, pharmacy, prosthetic, social work, and weight management services.

Location	Station No.	PC Workload/ Encounters	MH Workload/ Encounters	Specialty Care Services ⁹⁴ Provided	Diagnostic Services ⁹⁵ Provided	Ancillary Services ⁹⁶ Provided
Fort Smith, AR	564GB	18,236	9,148	Cardiology Dermatology Endocrinology Hematology/Oncology Infectious Disease Poly-Trauma Urology	Laboratory and Pathology Radiology	Nutrition Social Work Weight Management
Harrison, AR	564GA	2,123	440	Infectious Disease Urology	Laboratory and Pathology	Weight Management
Jay, OK	564GE	4,061	1,635	Dermatology Endocrinology Infectious Disease Poly-Trauma Eye Urology	n/a	Weight Management Nutrition
Mount Vernon, MO	564BY	28,533	12,198	Cardiology Dermatology Endocrinology Gastroenterology Hematology/Oncology Infectious Disease Poly-Trauma Anesthesia Eye General Surgery GYN Podiatry Urology	EKG Laboratory and Pathology	Nutrition Pharmacy Social Work Weight Management

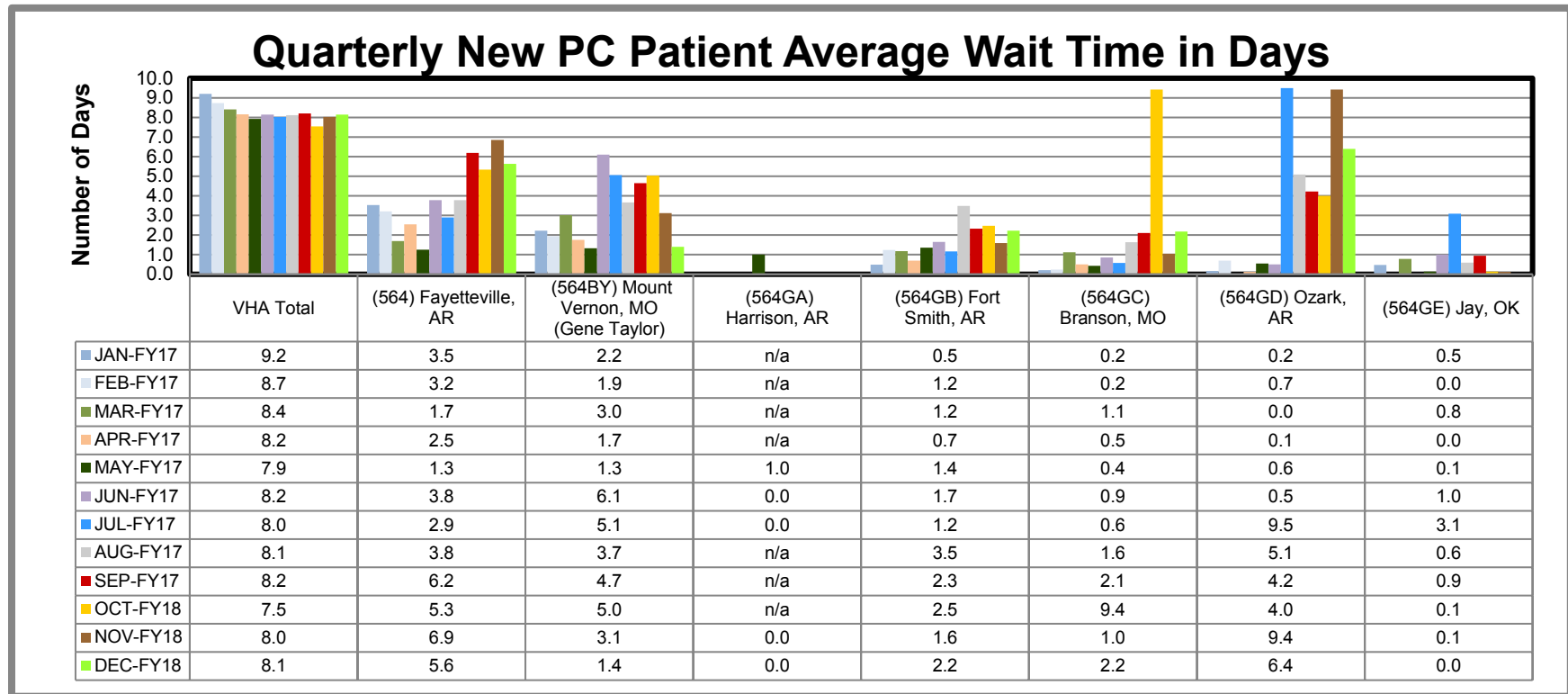
Location	Station No.	PC Workload/ Encounters	MH Workload/ Encounters	Specialty Care Services ⁹⁴ Provided	Diagnostic Services ⁹⁵ Provided	Ancillary Services ⁹⁶ Provided
Ozark, AR	564GD	2,576	1,104	Dermatology Poly-Trauma Urology	n/a	Weight Management Nutrition

Source: VHA Support Service Center and VA Corporate Data Warehouse

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

n/a = not applicable

Appendix C: Patient Aligned Care Team Compass Metrics⁹⁷



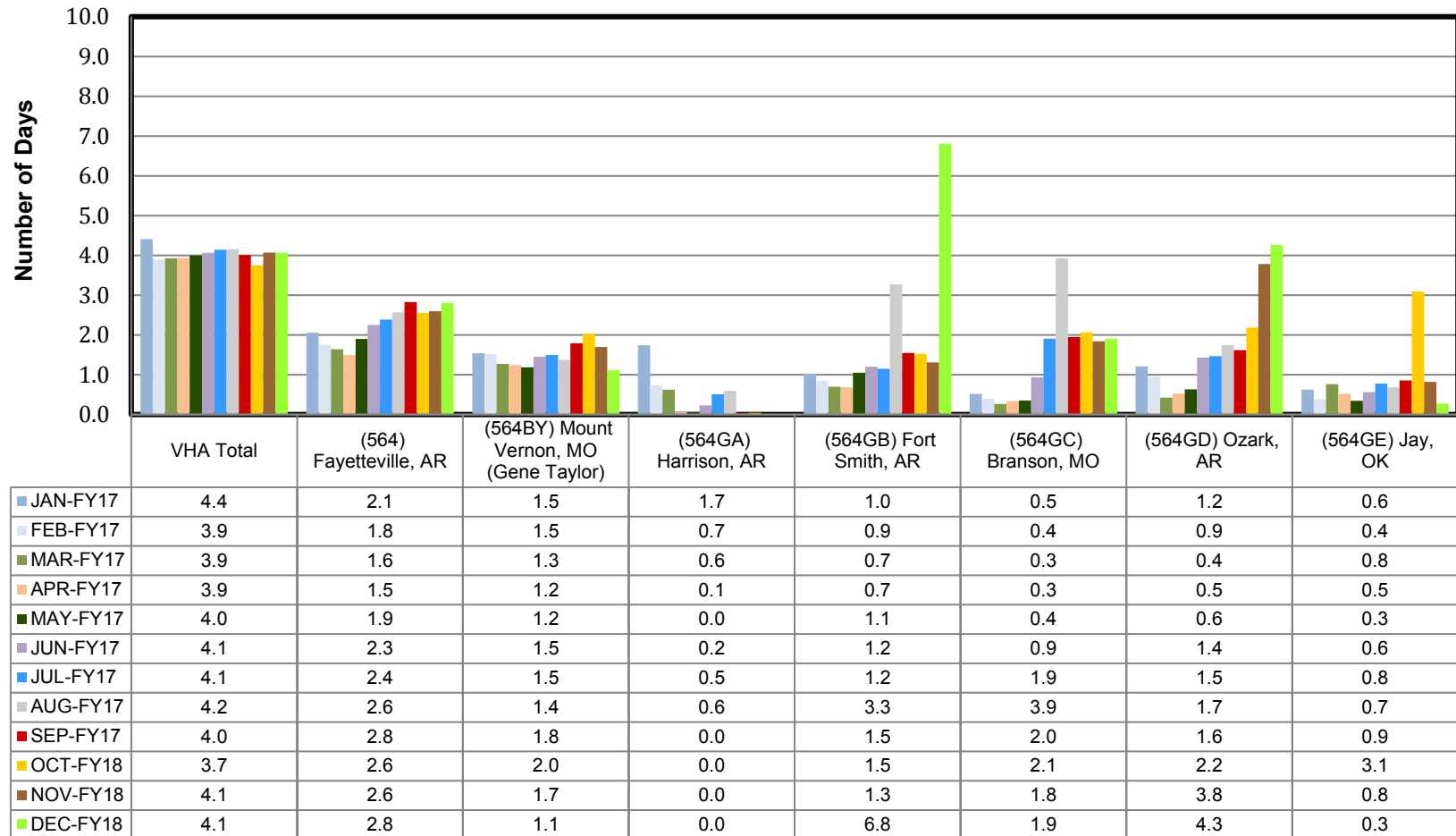
Source: VHA Support Service Center

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

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

⁹⁷ Department of Veterans Affairs, Patient Aligned Care Teams Compass Data Definitions, accessed September 11, 2017.

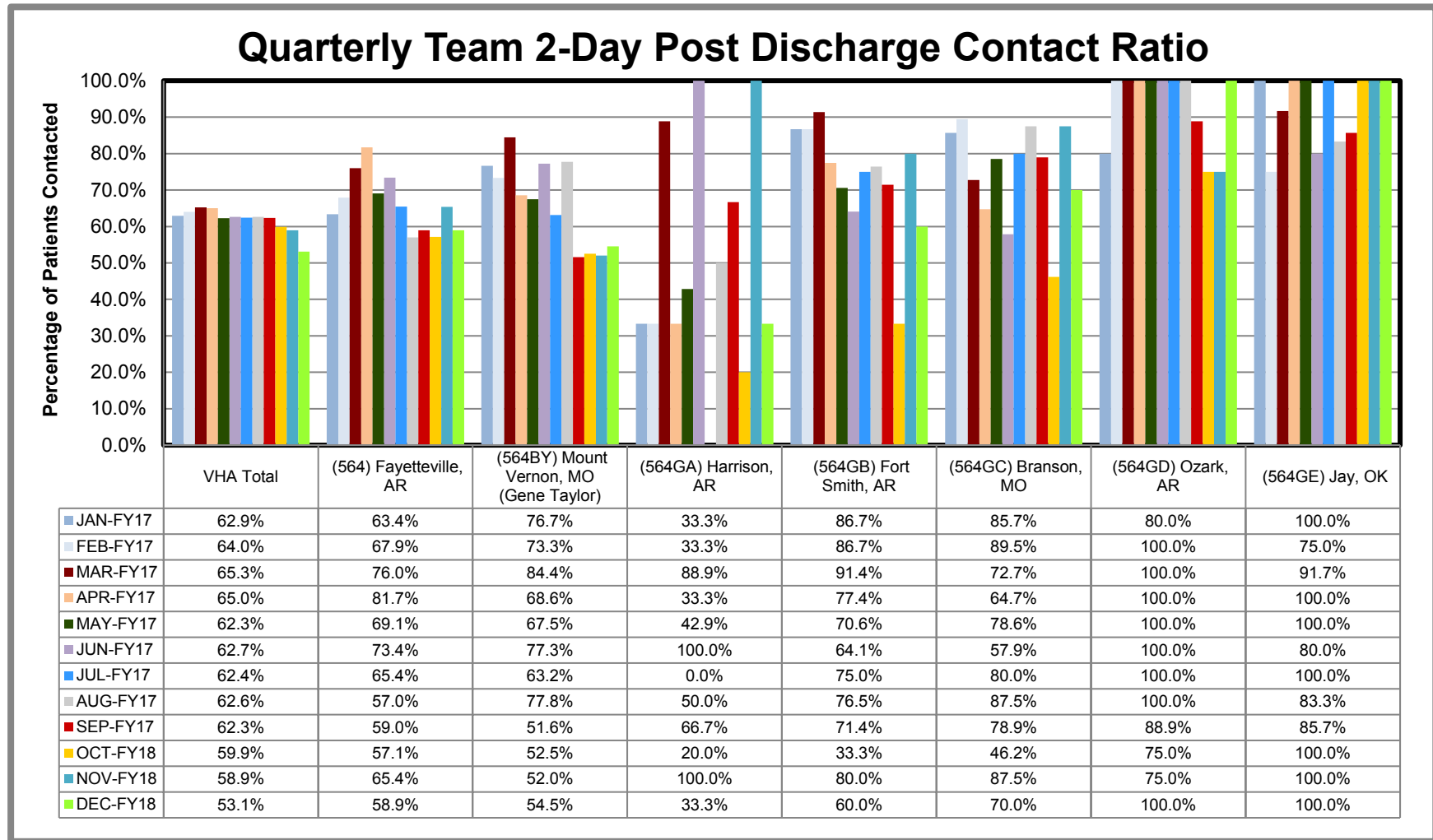
Quarterly Established PC Patient Average Wait Time in Days



Source: VHA Support Service Center

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

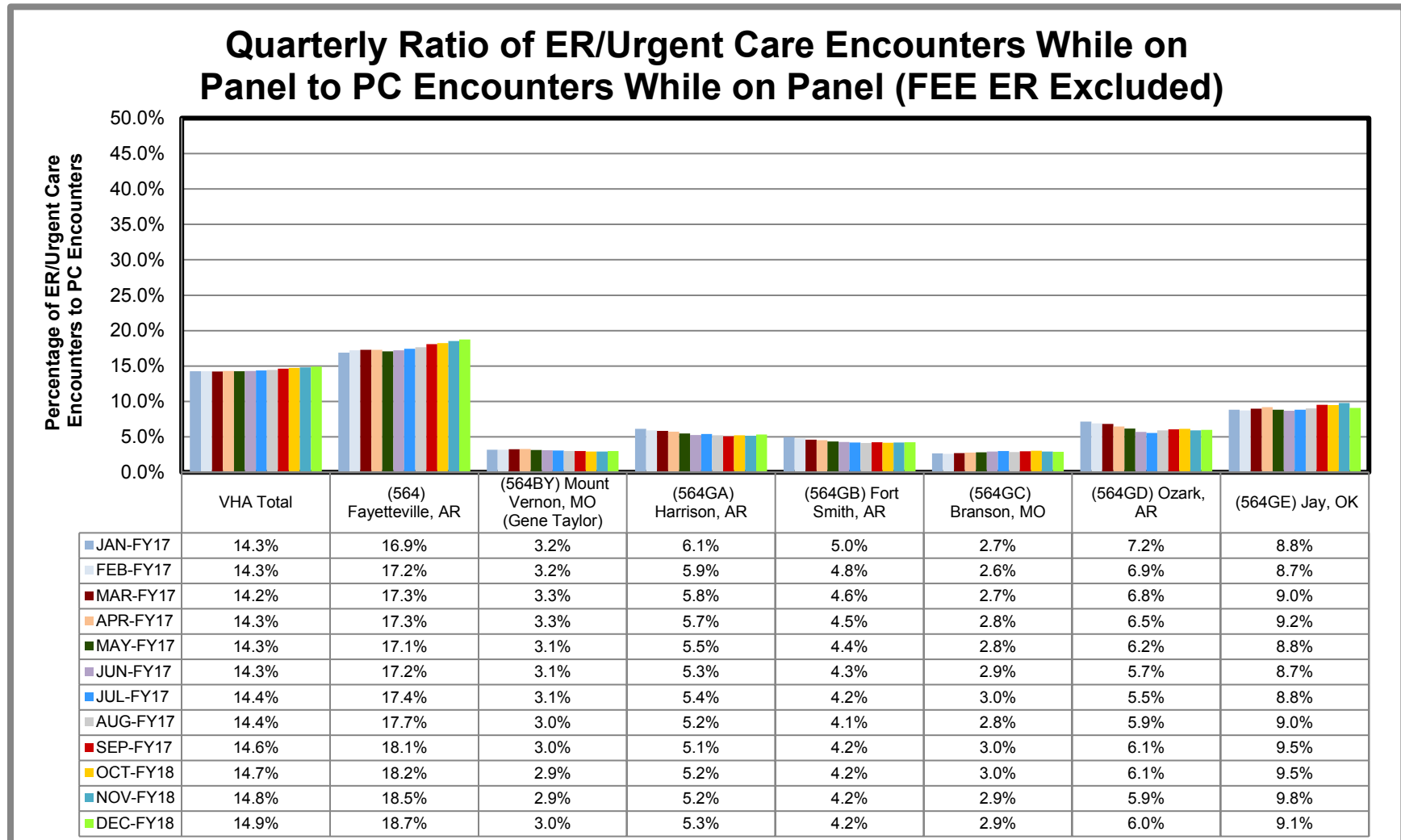
Data Definition: The average number of calendar days between an established patient's PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic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



Source: VHA Support Service Center

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

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



Source: VHA Support Service Center

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

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

Appendix D: Strategic Analytics for Improvement and Learning (SAIL) Metric Definitions⁹⁸

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

⁹⁸ VHA Support Service Center (VSSC), Strategic Analytics for Improvement and Learning (SAIL), accessed: February 14, 2018.

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

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

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

Source: VHA Support Service Center

Appendix E: VISN Director Comments

Department of Veterans Affairs Memorandum

Date: July 31, 2018

From: Director, South Central VA Health Care Network (10N16)

Subj: CHIP Review of the Veterans Health Care System of the Ozarks, Fayetteville, AR

To: Director, Atlanta Office of Healthcare Inspections (54AT)

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

1. The South Central VA Health Care Network (VISN 16) has reviewed and concurs with the recommendations and the facility's response to the draft CHIP report for the Veterans Healthcare System of the Ozarks, Fayetteville, AR.

(Original signed by:)

Shannon A. Novotny, Deputy Network Director

On behalf of

Skye McDougall, Network Director

*For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

Appendix F: Interim Facility Director Comments

Department of Veterans Affairs Memorandum

Date: July 31, 2018

From: Interim Medical Center Director, Veterans Health Care System of the Ozarks (564/00)

Subj: CHIP Review of the Veterans Health Care System of the Ozarks, Fayetteville, AR

To: Director, South Central VA Health Care Network (10N16)

1. I would like to express my appreciation to the Office of Inspector General (OIG) Healthcare Inspection Team for their professional and comprehensive review of Veterans Health Care System of the Ozarks.
2. I have reviewed the draft report for the Veterans Health Care System of the Ozarks and concur with the report, conclusions rendered, and the recommendations.
3. Please express my thanks to the team for their professionalism and assistance to us in our continuing efforts to improve the care we provide to our Veterans.

(Original signed by:)

Kelvin L. Parks, MA
Interim Medical Center Director

*For accessibility, the original format of this appendix has been modified
to comply with Section 508 of the Rehabilitation Act of 1973, as amended.*

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