



DEPARTMENT OF VETERANS AFFAIRS  
**OFFICE OF INSPECTOR GENERAL**

*Office of Healthcare Inspections*

VETERANS HEALTH ADMINISTRATION

Comprehensive Healthcare  
Inspection Program Review  
of the VA Southern Nevada  
Healthcare System

North Las Vegas, Nevada



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**Figure 1.** VA Southern Nevada Healthcare System, North Las Vegas, Nevada  
(Source: <https://vaww.va.gov/directory/guide/>, accessed on September 27, 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 VA Southern Nevada Healthcare System (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;
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 July 9, 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 Director, Chief of Staff, Associate Director for Patient Care Services (ADPCS), Associate Director, and Assistant Director. Organizational communication and accountability are carried out through a committee reporting structure, with the Executive Leadership Board having oversight for the Administrative Executive, Medical Executive, Quality Safety Value, Workforce, Veteran Experience, and Nurse Executive Councils. The Facility leaders are members of the Quality Safety Value Council, through which they track, trend, and monitor quality of care and patient outcomes.

The Associate Director was assigned in February 2018; and the remaining executive leaders had worked together since December 2015, when the Director was appointed. The Chief of Staff, assigned in December 2002, was the most tenured member of the executive team. The ADPCS and Assistant Director were assigned in July 2013 and September 2012, respectively.

In the review of selected employee satisfaction survey results regarding Facility leaders, the OIG noted generally satisfied employees. However, opportunities appear to exist to improve patient experiences in the outpatient setting.

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.<sup>1</sup> 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 Efficiency metrics likely contributing to the current “2-Star” rating.

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

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<sup>1</sup> 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.)

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

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

### **Credentialing and Privileging**

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

### **Environment of Care**

The OIG found general compliance with requirements for infection prevention, privacy measures, and emergency management at the Facility. The OIG did not note any issues with the availability of medical equipment and supplies. However, the OIG identified safety deficiencies at the representative community based outpatient clinic and in the locked mental health unit.

### **Medication Management**

The OIG found general compliance with requirements for most of the performance indicators evaluated, including monthly reports, ordering procedures, and the Controlled Substances (CS) Coordinator and Inspectors having no conflicts of interest and completing required training. However, the OIG identified deficiencies with the annual pharmacy physical security survey, monthly inspections, reconciliation of CS distribution and returns to pharmacy stock, and the CS Coordinator conducting routine inspections.

### **Long-term Care**

The OIG noted general compliance with provision of clinical care and implementation of interventions when indicated. However, the OIG identified a deficiency with program evaluation.

### **Summary**

In the review of key care processes, the OIG issued eight recommendations that are attributable to the Director, Chief of Staff, and 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 CHIP review findings and recommendations and provided acceptable improvement plans. (See Appendixes E and F, pages 58–59, 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.



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# Contents

Abbreviations .....	ii
Report Overview .....	iii
Results and Review Impact .....	iv
Contents .....	vii
Purpose and Scope .....	1
Methodology .....	3
Results and Recommendations .....	4
Leadership and Organizational Risks .....	4
Quality, Safety, and Value .....	18
Credentialing and Privileging .....	20
Recommendation 1 .....	22
Environment of Care .....	23
Recommendation 2 .....	25
Recommendation 3 .....	26
Medication Management: Controlled Substances Inspection Program .....	27
Recommendation 4 .....	30
Recommendation 5 .....	31
Recommendation 6 .....	32
Recommendation 7 .....	32
Mental Health: Posttraumatic Stress Disorder Care .....	34
Long-term Care: Geriatric Evaluations .....	36
Recommendation 8 .....	37
Women’s Health: Mammography Results and Follow-up .....	39
High-risk Processes: Central Line-associated Bloodstream Infections .....	41

Appendix A: Summary Table of Comprehensive Healthcare Inspection Program Review  
Findings.....43

Appendix B: Facility Profile and VA Outpatient Clinic Profiles .....47

    Facility Profile.....47

    VA Outpatient Clinic Profiles.....48

Appendix C: Patient Aligned Care Team Compass Metrics .....50

Appendix D: Strategic Analytics for Improvement and Learning (SAIL) Metric  
Definitions.....54

Appendix E: VISN Director Comments .....58

Appendix F: Facility Director Comments.....59

OIG Contact and Staff Acknowledgments .....60

Report Distribution .....61



## 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 inpatient and outpatient settings of the VA Southern Nevada Healthcare System (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.<sup>3,4</sup> 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.<sup>5</sup> 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).<sup>6</sup>

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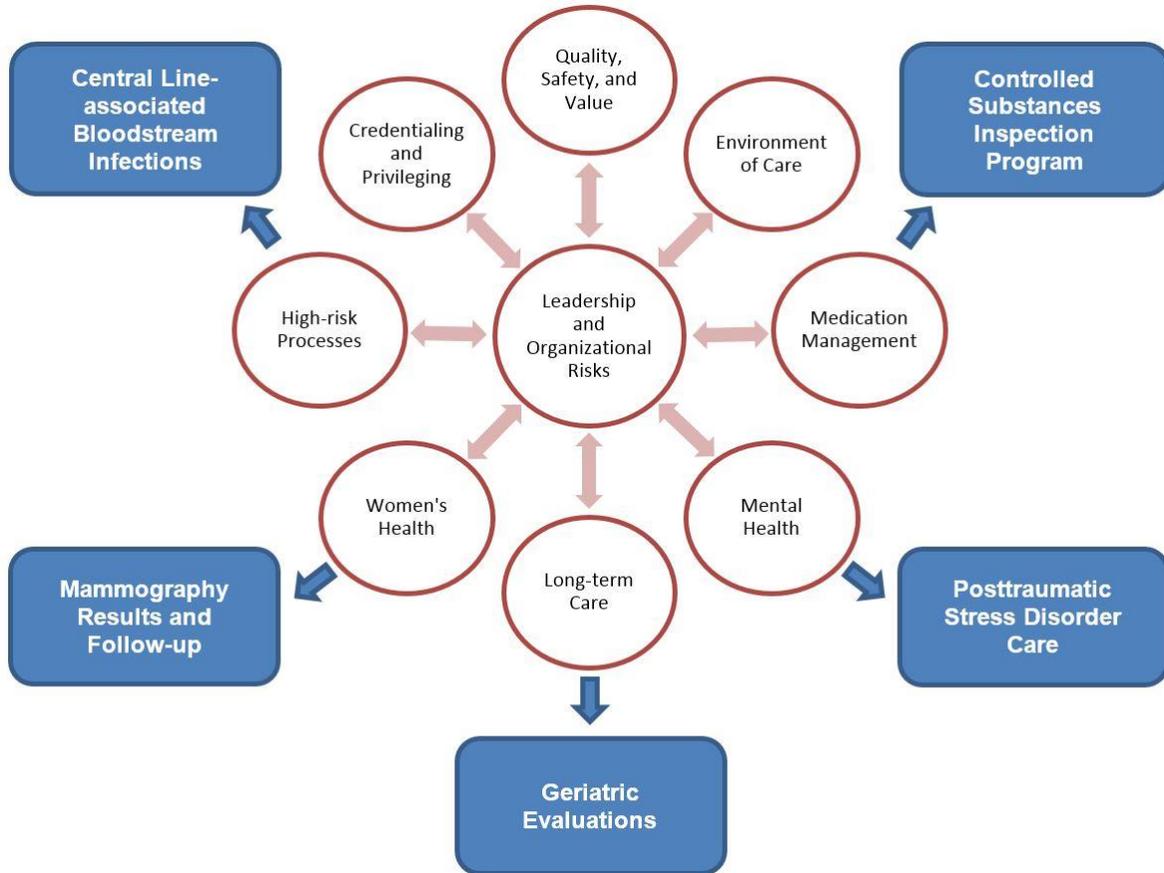
<sup>3</sup> Carol Stephenson, “The role of leadership in managing risk,” *Ivey Business Journal*, November/December 2010. <https://iveybusinessjournal.com/publication/the-role-of-leadership-in-managing-risk/>. (Website accessed on March 1, 2018.)

<sup>4</sup> 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.)

<sup>5</sup> 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 on March 1, 2018.)

<sup>6</sup> 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

## 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;<sup>7</sup> 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 September 15, 2015,<sup>8</sup> through July 9, 2018, the date when an unannounced week-long site visit commenced.

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 Director's comments submitted in response to the recommendations in this report appear within each topic area.

While on site, the OIG did not receive any complaints beyond the scope of the CHIP 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.

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

<sup>8</sup> 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 the selected clinical areas of focus.<sup>9</sup> 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

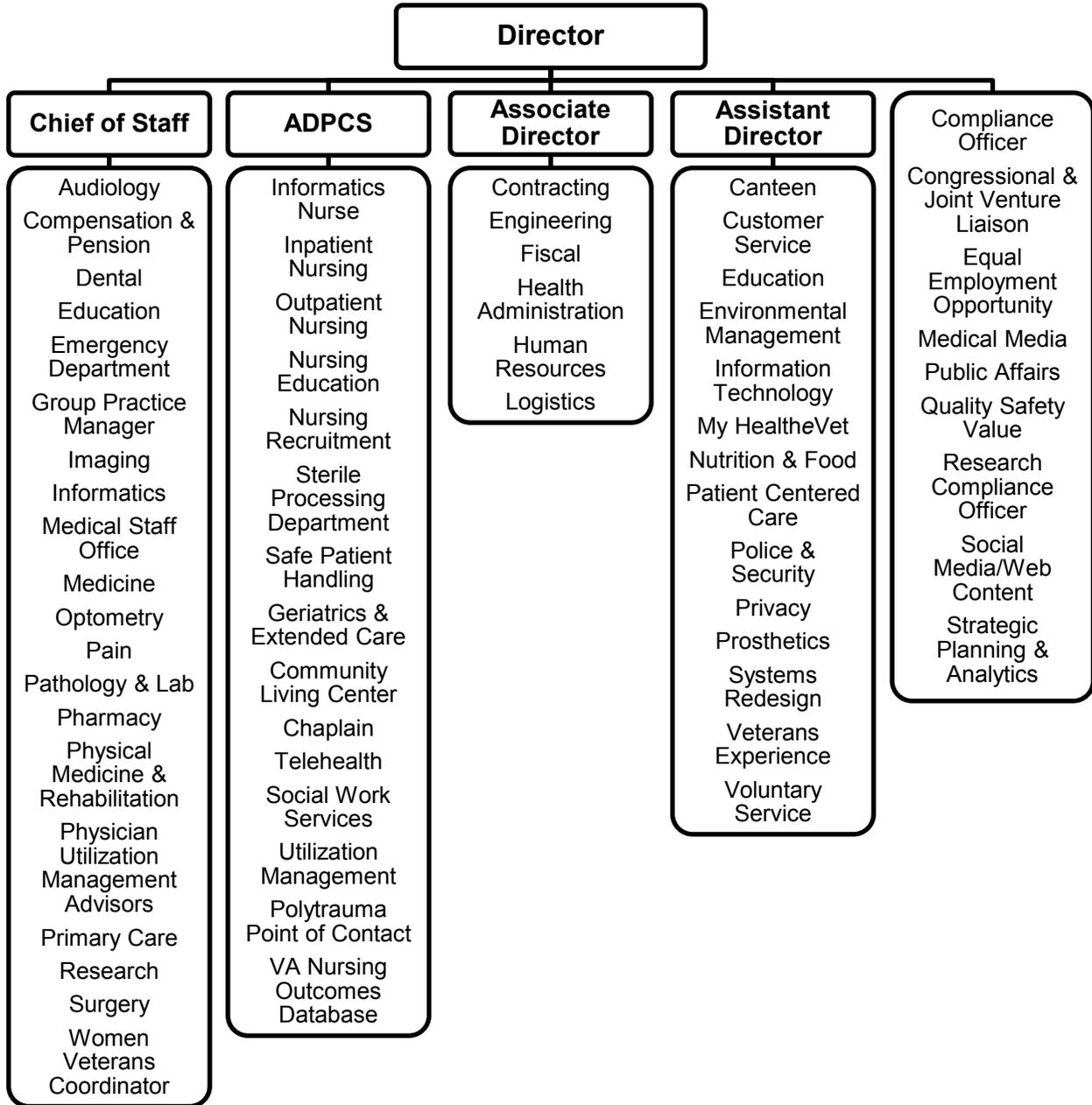
Because each VA facility organizes its leadership to address the needs and expectations of the local veteran population that it serves, organizational charts may differ among facilities. Figure 3 illustrates the Facility's reported organizational structure. The Facility has a leadership team consisting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

The Associate Director was assigned in February 2018, and the remaining executive leaders had worked together since December 2015, when the Director was appointed. The Chief of Staff, assigned in December 2002, was the most tenured member of the leadership team. The ADPCS and Assistant Director were assigned in July 2013 and September 2012, respectively.

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<sup>9</sup> 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: VA Southern Nevada Healthcare System (received July 9, 2018)

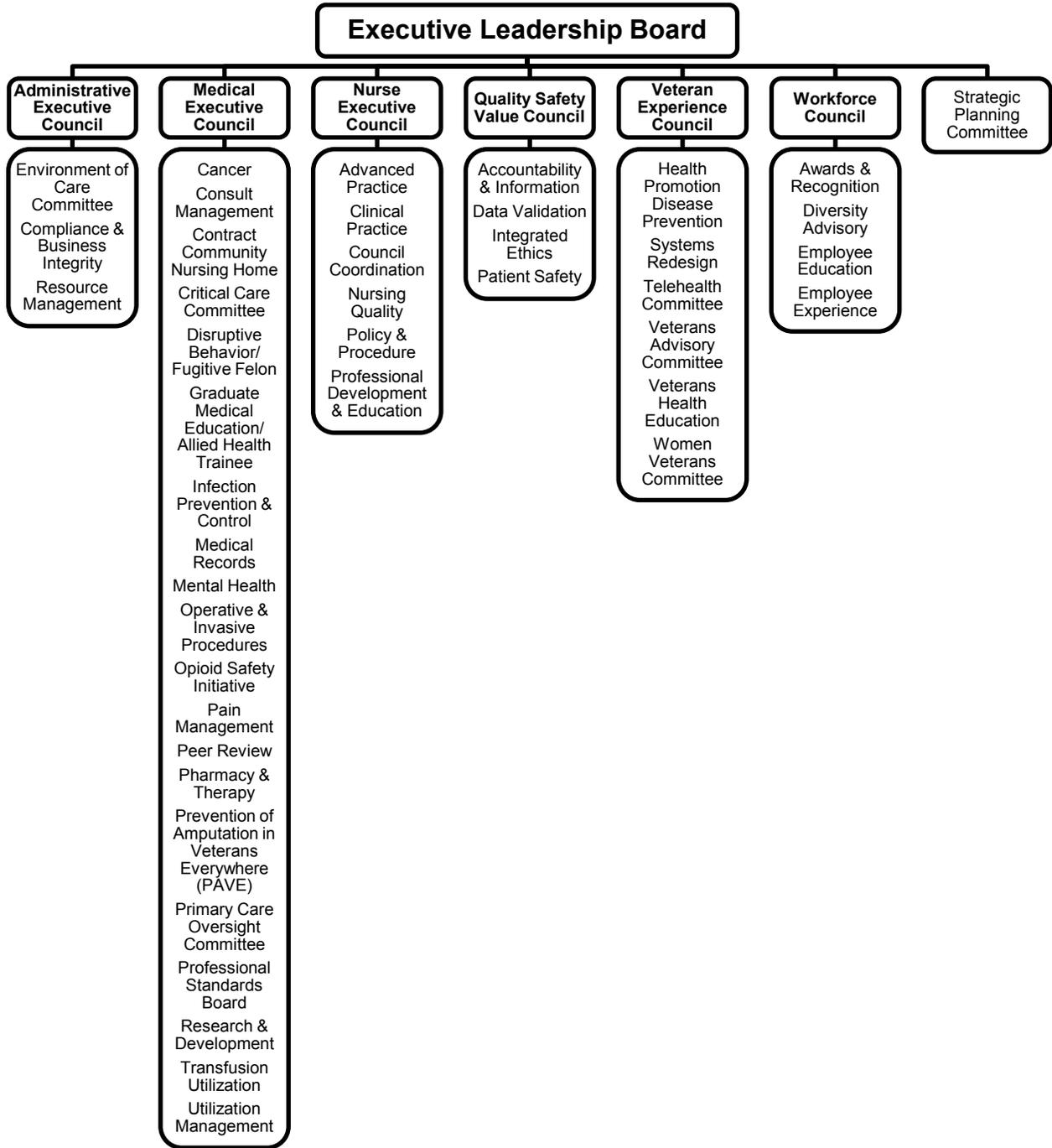
To help assess engagement of Facility executive leadership, the OIG interviewed the Director, Chief of Staff, ADPCS, and Assistant Director regarding their knowledge of various performance metrics and their involvement and support of actions to improve or sustain performance. The OIG did not interview the Associate Director who was off site during the visit.

In individual interviews, these executive leadership team members generally spoke 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. Organizational communication and accountability is carried out through a committee reporting structure with the Executive Leadership Board having oversight for the Administrative Executive, Medical Executive, Quality Safety Value, Workforce, Veteran Experience, and Nurse Executive Councils. The Director serves as the chairperson of the Executive Leadership Board with the authority and responsibility to establish policy, maintain quality care standards, and perform organizational management and strategic planning. The Quality Safety Value Council, co-chaired by the Director, is responsible for tracking, trending, and monitoring quality of care and patient outcomes. The executive Facility leaders are members of the Executive Leadership Board and the Quality Safety Value Council. See Figure 4.

**Figure 4. Facility Committee Reporting Structure**



Source: VA Southern Nevada Healthcare System (received August 16, 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 survey results that relate to the period of October 1, 2016, through September 30, 2017. Tables 1–3 provide relevant survey results for VHA, the Facility, and selected Facility executive leaders.<sup>10</sup>

Table 1 summarizes employee attitudes toward selected Facility leaders as expressed in VHA’s All Employee Survey.<sup>11</sup> The Facility average for both selected survey questions was below the VHA average.<sup>12</sup> However, each leader’s results were higher than the VHA and Facility averages. In all, employees appear generally satisfied with Facility leaders.

**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 Average	Chief of Staff Average	ADPCS Average	Assoc. Director Average	Asst. Director Average
All Employee Survey: <i>Servant Leader Index Composite</i>	0–100 where HIGHER scores are more favorable	67.7	63.0	84.2	80.4	83.9	79.2	73.3
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	3.1	4.0	3.7	4.2	4.2	4.0

Source: VA All Employee Survey (accessed June 8, 2018)

<sup>10</sup> Rating is based on responses by employees who report to or are aligned under the Director, Chief of Staff, ADPCS, Associate Director, and Assistant Director.

<sup>11</sup> The All Employee Survey is an annual, voluntary, census survey of VA workforce experiences. The data are anonymous and confidential. The instrument has been refined at several points since 2001 in response to operational inquiries by VA leadership on organizational health relationships and VA culture.

<sup>12</sup> 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.

Table 2 summarizes employee attitudes toward the workplace as expressed in VHA’s All Employee Survey. Although the Facility averages for the selected survey questions were lower than the VHA average, results for each member of the executive leadership team were higher than the Facility and VHA averages.

**Table 2. Survey Results on Employee Attitudes toward Workplace  
(October 1, 2016, through September 30, 2017)**

Questions/ Survey Items	Scoring	VHA Average	Facility Average	Director Average	Chief of Staff Average	ADPCS Average	Assoc. Director Average	Asst. Director Average
All Employee Survey Q43. <i>My supervisor encourages people to speak up when they disagree with a decision.</i>	1 (Strongly Disagree)– 5 (Strongly Agree)	3.8	3.6	4.4	4.1	4.5	4.2	4.1
All Employee Survey Q44. <i>I feel comfortable talking to my supervisor about work-related problems even if I’m partially responsible.</i>	1 (Strongly Disagree)– 5 (Strongly Agree)	3.9	3.7	4.5	4.4	4.6	4.2	4.3
All Employee Survey Q75. <i>I can talk with my direct supervisor about ethical concerns without fear of having my comments held against me.</i>	1 (Strongly Disagree)– 5 (Strongly Agree)	3.9	3.7	4.5	4.4	4.5	4.3	4.2

Source: VA All Employee Survey (accessed June 8, 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 (see Table 3). For this Facility, inpatient survey results reflected higher care ratings than the VHA average. However, opportunities appear to exist to improve outpatient satisfaction with care provided.

**Table 3. 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	74.0
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	83.9
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	70.7
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	74.8

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

### Accreditation/For-Cause Surveys<sup>13</sup> 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 4 summarizes the relevant Facility inspections most

<sup>13</sup> 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).<sup>14</sup> Indicative of effective leadership, the Facility has closed all recommendations for improvement as listed in Table 4.<sup>15</sup>

The OIG also noted the Facility’s current accreditation status with the Commission on Accreditation of Rehabilitation Facilities<sup>16</sup> and College of American Pathologists,<sup>17</sup> which demonstrates the Facility leaders’ commitment to quality care and services. Additionally, the Paralyzed Veterans of America conducted an inspection of the Facility’s spinal cord injury/disease services.<sup>18</sup>

**Table 4. 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 VA Southern Nevada Healthcare System, North Las Vegas, Nevada, November 24, 2015</i> )	September 2015	15	0
OIG ( <i>Review of Community Based Outpatient Clinics and Other Outpatient Clinics of VA Southern Nevada Healthcare System, North Las Vegas, Nevada, November 24, 2015</i> )	September 2015	11	0
OIG ( <i>Healthcare Inspection - Delays in the Evaluation and Care of a Patient with Lung Cancer, VA Southern Nevada Healthcare System, Las Vegas, Nevada, May 23, 2017</i> )	n/a	9	0
TJC • Regular	December 2016		

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<sup>14</sup> 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 VA medical facilities for over 35 years. Compliance with TJC standards facilitates risk reduction and performance improvement.

<sup>15</sup> 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.

<sup>16</sup> 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.

<sup>17</sup> 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.

<sup>18</sup> The Paralyzed Veterans of America inspection took place February 1, 2017. This Veteran Service Organization review does not result in accreditation status.

Accreditation or Inspecting Agency	Date of Visit	Number of Findings	Number of Recommendations Remaining Open
○ Hospital Accreditation		16	0
○ Behavioral Health Care Accreditation		3	0
○ Home Care Accreditation		5	0
● For Cause Survey	November 2016	4	0

Sources: OIG and TJC (Inspection/survey results verified with the Director on July 10, 2018)  
n/a = not applicable

### 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 5 summarizes key indicators of risk since the OIG’s previous September 2015 Combined Assessment Program and Community Based Outpatient Clinic (CBOC) and Other Outpatient Clinics review inspections through the week of July 9, 2018.<sup>19</sup>

<sup>19</sup> 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 VA Southern Nevada Healthcare System is a high complexity (1b) affiliated Facility as described in Appendix B.)

**Table 5. Summary of Selected Organizational Risk Factors  
(September 2015 to July 9, 2018)**

Factor	Number of Occurrences
Sentinel Events <sup>20</sup>	1
Institutional Disclosures <sup>21</sup>	4
Large-Scale Disclosures <sup>22</sup>	0

*Source: VA Southern Nevada Healthcare System’s Patient Safety Manager (received July 9, 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.<sup>23</sup> The rates presented are specifically applicable for this Facility, and lower rates indicate lower risks. Table 6 summarizes Patient Safety Indicator data from April 1, 2016, through March 31, 2018.

**Table 6. Patient Safety Indicator Data  
(April 1, 2016, through March 31, 2018)**

Measure	Reported Rate per 1,000 Hospital Discharges		
	VHA	VISN 21	Facility
Death among surgical inpatients with serious treatable conditions	113.92	67.62	43.48
Iatrogenic pneumothorax	0.17	0.13	0.12
Central venous catheter-related bloodstream infection	0.15	0.04	0.00
In-hospital fall with hip fracture	0.08	0.05	0.00
Perioperative hemorrhage or hematoma	2.62	3.30	2.72

<sup>20</sup> A sentinel event is an incident or condition that results in patient death, permanent harm, severe temporary harm, or intervention required to sustain life.

<sup>21</sup> 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.

<sup>22</sup> 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.

<sup>23</sup> Agency for Healthcare Research and Quality. <https://www.qualityindicators.ahrq.gov/>. (Website accessed on March 8, 2017.)

Measure	Reported Rate per 1,000 Hospital Discharges		
	VHA	VISN 21	Facility
Postoperative acute kidney injury requiring dialysis	0.65	0.44	0.00
Postoperative respiratory failure	5.11	3.65	4.34
Perioperative pulmonary embolism or deep vein thrombosis	3.09	4.27	1.77
Postoperative sepsis	3.72	3.48	1.33
Postoperative wound dehiscence	1.00	1.03	0.00
Unrecognized abdominopelvic accidental puncture/laceration	1.02	1.10	2.48

Source: VHA Support Service Center

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

Three Patient Safety Indicators (perioperative hemorrhage or hematoma, postoperative respiratory failure, and unrecognized abdominopelvic accidental puncture/laceration) show a higher observed rate than VHA and/or Veterans Integrated Service Network (VISN) 21. The OIG noted that all cases were presented and discussed at the Facility's Morbidity and Mortality Committee.

Three patients had perioperative hemorrhage (bleeding episodes) or developed hematomas (pooling of blood outside the blood vessels), which were addressed and corrected during surgery.

Three patients had postoperative respiratory failure. One patient required prolonged ventilator support after surgery due to pneumonia. A second patient developed postoperative hematoma and had to be reintubated to protect his airway. The third patient did not have postoperative respiratory failure. Clinical managers reported that staff incorrectly coded the case.

Two patients had unrecognized abdominopelvic accidental puncture/laceration. Clinical managers reported that clinicians identified and repaired the injuries during surgery.

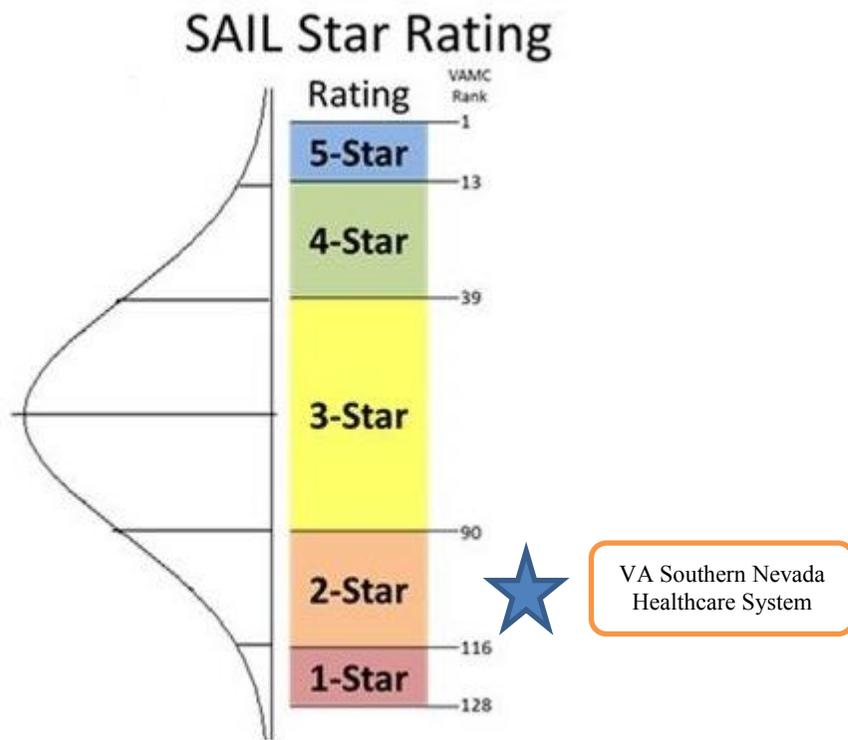
## Veterans Health Administration Performance Data

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.<sup>24</sup>

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.<sup>25</sup> As of June 30, 2017, the Facility was rated at “2-Star” for overall quality. Updated data as of June 30, 2018, indicates that the Facility has remained at “2-Star” for overall quality.

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



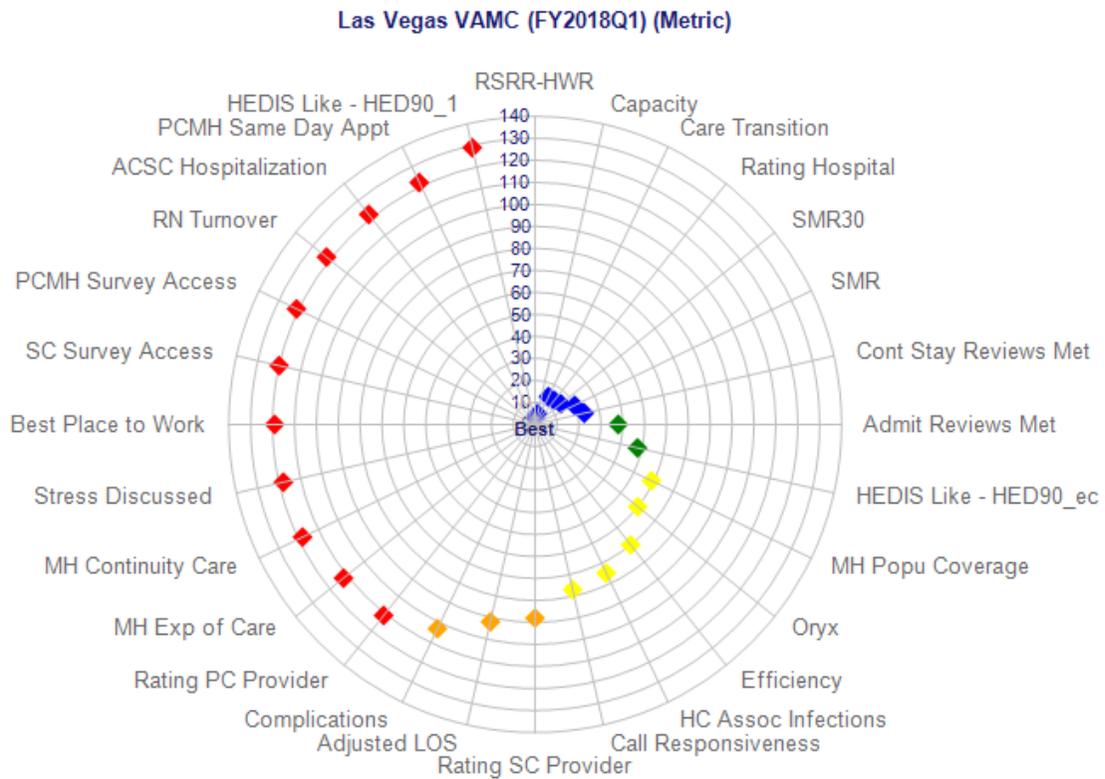
*Source: VA Office of Informatics and Analytics- Office of Operational Analytics and Reporting (accessed June 8, 2018)*

<sup>24</sup> 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.)

<sup>25</sup> Based on normal distribution ranking quality domain of 128 VA Medical Centers.

Figure 6 illustrates the Facility’s Quality of Care and Efficiency metric rankings and performance compared with other VA facilities as of December 31, 2017. Of note, Figure 6 uses blue and green data points to indicate high performance (for example in the areas of Capacity, Continued (Cont) Stay Reviews Met, and Admit Reviews Met).<sup>26</sup> Metrics that need improvement are denoted in orange and red (for example, Complications, Best Place to Work, and Registered Nurse (RN) Turnover).

**Figure 6. Facility Quality of Care and Efficiency Metric Rankings  
(as of December 31, 2017)**



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

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.

<sup>26</sup> For data definitions of acronyms in the SAIL metrics, please see Appendix D.

## Conclusion

The Facility has a generally stable executive leadership team. Except for the Associate Director, who was assigned in February 2018, the leaders have been working together since December 2015. The OIG noted that Facility leaders appeared actively engaged with employees. However, opportunities appear to exist to improve patient experiences in the outpatient setting. Facility leaders appear to support 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. The leadership team was actively engaged and knowledgeable about selected SAIL metrics but should continue to take actions to improve performance of Quality of Care and Efficiency metrics likely contributing to the current "2-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.<sup>27</sup> VHA also strives to provide healthcare services that compare favorably to the best of the private sector in measured outcomes, value, and efficiency.<sup>28</sup>

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,<sup>29</sup> utilization management (UM) reviews,<sup>30</sup> and patient safety incident reporting with related root cause analyses (RCAs).<sup>31</sup>

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.<sup>32</sup>

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<sup>27</sup> VHA Directive 1026; *VHA Enterprise Framework for Quality, Safety, and Value*, August 2, 2013.

<sup>28</sup> Department of Veterans Affairs, *Veterans Health Administration Blueprint for Excellence*, September 2014.

<sup>29</sup> According to VHA Directive 2010-025, *Peer Review for Quality Management*, 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.)

<sup>30</sup> According to VHA Directive 1117, UM reviews evaluate the appropriateness, medical need, and efficiency of healthcare services according to evidence-based criteria.

<sup>31</sup> 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.

<sup>32</sup> 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:<sup>33</sup>

- 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 VHA's patient safety reporting system<sup>34</sup>
  - Annual completion of a minimum of eight RCAs<sup>35</sup>
  - Provision of feedback about RCA actions to reporting employees
  - Submission of annual patient safety report

## Conclusion

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

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<sup>33</sup> For CHIP reviews, the OIG selects performance indicators based on VHA or regulatory requirements or accreditation standards and evaluates these for compliance.

<sup>34</sup> WebSPOT has been the software application used for reporting and documenting adverse events in the VHA (National Center for Patient Safety) Patient Safety Information System database. However, it is expected that by April 1, 2018, all facilities will have implemented the new Joint Patient Safety Reporting System (JPSR); and it is anticipated that all previous patient safety event reporting systems will be discontinued by July 1, 2018.

<sup>35</sup> 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.

## 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).<sup>36</sup>

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.<sup>37</sup>

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 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.<sup>38</sup>

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,<sup>39</sup> and 20 LIPs who were re-privileged within 12 months prior to the visit.<sup>40</sup> The OIG evaluated the following performance indicators:

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

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<sup>36</sup> VHA Handbook 1100.19, *Credentialing and Privileging*, October 15, 2012. (Due for recertification October 31, 2017, but has not been updated.)

<sup>37</sup> VHA Handbook 1100.19.

<sup>38</sup> VHA Handbook 1100.19.

<sup>39</sup> The 18-month period was from January 9, 2017, through July 9, 2018.

<sup>40</sup> The 12-month review period was from July 9, 2017, through July 9, 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, privileging, and OPPEs. However, the OIG identified a deficiency with the FPPE process.

## Focused Professional Practice Evaluation

VHA requires that all LIPs new to the facility have FPPEs completed and documented in the practitioner's provider profile and reported to an appropriate committee of the Medical Staff. The process uses objective criteria and involves the evaluation of privilege-specific competence of the practitioner who has not had documented evidence of competently performing the requested privileges. FPPEs may include periodic chart review, direct observation, monitoring of diagnostic and treatment techniques, or discussion with other individuals involved in the care of

patients. VHA also requires that FPPEs be time-limited.<sup>41</sup> Time limitations help to ensure an efficient process by preventing undefined or indefinite evaluation of providers.

For 5 of the 10 profiles reviewed, the OIG found that FPPE timeframes were not clearly delineated. Facility managers were aware of the requirement, reviewed the process, and acknowledged that a general date range did not meet time-limited requirement for FPPEs. Clinical managers reported that, prior to the OIG site visit, they had developed new forms that clearly delineated timeframes.

### **Recommendation 1**

1. The Chief of Staff ensures clinical managers initiate Focused Professional Practice Evaluations that include clearly delineated timeframes and monitors compliance.

Facility concurred.

Target date for completion: January 31, 2019

Facility response: All FPPE forms have been revised to ensure FPPE timeframes are clearly delineated in mm/dd/yyyy format. The compliance rate for forms submitted August – October 2018 (3 months) was 100%.

Target: The Medical Staff Supervisor will report 100% compliance to the Professional Standards Board for a minimum of six months from August 2018 to January 2019.

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<sup>41</sup> VHA Handbook 1109.19.

## 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.<sup>42</sup>

The purpose of the OIG review was to determine whether the Facility maintained a clean and safe healthcare environment in accordance with applicable requirements. The OIG also determined whether the Facility met requirements in selected areas that are often associated with higher risks of harm to patients in the locked MH Unit and with Emergency Management processes.<sup>43</sup>

VHA requires managers to ensure capacity for MH services for veterans with acute and severe emotional and/or behavioral symptoms causing a safety risk to self or others, and/or resulting in severely compromised functional status. This level of care is typically provided in an inpatient setting to ensure safety and to provide the type and intensity of clinical intervention necessary to treat the patient. Such care needs to be well integrated with the full continuum of care to support safety and effective management during periods of such severe difficulty. Inpatient MH settings must also provide a healing, recovery-oriented environment.<sup>44</sup>

VHA requires managers to establish a comprehensive Emergency Management program to ensure continuity of patient care and hospital operations in the event of a disaster or emergency, which includes conducting a Hazard Vulnerability Analysis (HVA) and developing an Emergency Operations Plan (EOP).<sup>45</sup> These requirements allow the identification and minimization of impacts from potential hazards, threats, incidents, and events on health care and other essential services provided by facilities. VHA also requires managers to develop Utility Management Plans to ensure reliability and reduce failures of electrical power distribution systems in accordance with TJC,<sup>46</sup> Occupational Safety and Health Administration,<sup>47</sup> and

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<sup>42</sup> VHA Directive 1608, *Comprehensive Environment of Care*, February 1, 2016.

<sup>43</sup> 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).

<sup>44</sup> VHA Handbook 1160.06, *Inpatient Mental Health Services*, September 16, 2013.

<sup>45</sup> VHA Directive 0320.01, *Comprehensive Emergency Management Program Procedures*, April 6, 2017.

<sup>46</sup> TJC. Environment of Care standard EC.02.05.07.

<sup>47</sup> Occupational Safety and Health (OSHA) is part of the US Department of Labor. OSHA assures safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education, and assistance.

National Fire Protection Association standards.<sup>48</sup> The provision of sustained electrical power during disasters or emergencies is critical to continued operations of a healthcare facility.

In all, the OIG team inspected seven patient care areas—intensive care, medical/surgical 6E and 6W, pre-operative/post-anesthesia care, and the locked mental health units; the Emergency Department, and the primary care clinic. The team also inspected the Northwest Las Vegas VA Clinic. The OIG reviewed 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
- Locked MH Unit
  - Bi-annual MH EOC Rounds
  - Nursing station security

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<sup>48</sup> National Fire Protection Association (NFPA) is a global nonprofit organization devoted to eliminating death, injury, and property and economic loss due to fire, electrical, and related hazards.

- Public area and general unit safety
- Patient room safety
- Infection prevention
- Availability of medical equipment and supplies
- Emergency Management
  - Hazard Vulnerability Analysis (HVA)
  - Emergency Operations Plan (EOP)
  - Emergency power testing and availability

## Conclusion

Infection prevention and privacy measures were in place at the Facility. The OIG did not note any issues with the availability of medical equipment and supplies, and the Emergency Management program met all requirements. However, the OIG identified safety deficiencies at the Northwest Las Vegas VA Clinic and in the locked MH unit that warranted recommendations for improvement.

## Northwest Las Vegas VA Clinic Panic Alarm Testing

VHA requires Police and Security Operations to regularly test appropriate physical security precautions and equipment, including panic alarms in high-risk outpatient areas.<sup>49</sup> Regular testing of alarm systems ensures patient and staff safety. At the Northwest Las Vegas VA Clinic, the OIG found no evidence that the panic alarms were tested. This resulted in a lack of assurance of a safe environment for patients and staff. Police and Security Operations leaders were unaware of the requirement.

## Recommendation 2

2. The Associate Director ensures the VA Police regularly test panic alarms at the Northwest Las Vegas VA Clinic and monitors compliance.

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<sup>49</sup> VHA Directive 2012-026, *Sexual Assaults and other Defined Public Safety Incidents in Veterans Health Administration (VHA) Facilities*, September 27, 2012.

Facility concurred.

Target date for completion: December 31, 2019

Facility response: The panic alarms at the Primary Care Clinics (PCCs) to include the Northwest PCC are tested monthly and documented by VA Police and Security Service. Monthly testing at the Northwest Clinic has occurred & been separately documented since July 2018 resulting in 100% compliance for 3 consecutive months (1 quarter). Monitoring will occur for an additional quarter (October – December 2018). The testing results for all PCCs will be submitted and reported at the Environment of Care Council quarterly beginning the 1st quarter of FY 2019.

### **Locked Mental Health Unit Alarm Testing**

VHA requires Police and Security Operations to periodically test and document response time to panic alarms in locked MH units to ensure patient, visitor, and staff safety.<sup>50</sup> Noncompliance places patients, staff, and visitors at risk. The OIG found no evidence that the panic alarms were tested. This resulted in a lack of assurance of a safe environment for patients and staff. Police and Security Operations leaders were unaware of the requirement to test and document response time to panic alarms.

### **Recommendation 3**

3. The Associate Director ensures the VA Police test panic alarms and document response time to alarm testing in the locked mental health unit and monitors compliance.

Facility concurred.

Target date for completion: March 30, 2019

Facility response: Monthly testing with documented response times for the panic alarms on the locked Mental Health unit began in October 2018. VA Police and Security Service will continue to conduct monthly testing, to include documented response times. The results will be submitted and reported at the Environment of Care Council quarterly beginning the 2<sup>nd</sup> quarter of FY 2019.

Target: Monitoring will continue until 100% monthly testing with documented response times have been completed for 2 consecutive quarters.

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<sup>50</sup> VA National Center for Patient Safety, *Mental Health Environment of Care Checklist (MHEOCC)*, December 8, 2016.

## 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.<sup>51</sup> 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.<sup>52</sup>

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. 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.<sup>53</sup>

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.<sup>54</sup> The OIG team interviewed key managers and reviewed CS inspection reports for the prior two completed quarters;<sup>55</sup> monthly summaries of findings, including discrepancies, provided to the Director for the prior 12 months;<sup>56</sup> CS inspection quarterly trend reports for the prior four quarters;<sup>57</sup> 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

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<sup>51</sup> Drug Enforcement Agency Controlled Substance Schedules. <https://www.deadiversion.usdoj.gov/schedules/>. (Website accessed on August 21, 2017.)

<sup>52</sup> 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.

<sup>53</sup> VHA Directive 1108.02(1), *Inspection of Controlled Substances*, November 28, 2016 (Amended March 6, 2017).

<sup>54</sup> 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.

<sup>55</sup> The review period was October 1, 2017, through March 31, 2018.

<sup>56</sup> The review period was April 1, 2017, through March 31, 2018.

<sup>57</sup> The four quarters were from April 1, 2017, through March 31, 2018.

- 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 CSCs
- 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 destruction<sup>58</sup>

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<sup>58</sup> 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 performance indicators including monthly reports, ordering procedures, and the CSC and CSIs having no conflicts of interest and completing required training. The pharmacy manager reported that the national shortage of injectable opioid pain medications, based on services typically provided at the Facility, did not impact needed treatment and care of their patients. However, the OIG identified deficiencies with the annual pharmacy physical security survey, distinguishable patterns of monthly inspections, reconciliation of CS distribution and returns to pharmacy stock, and the CSC conducting routine monthly CS inspections that warranted recommendations for improvement.

## Annual Physical Security Survey

VHA requires the Chief, Police and Security Service to follow up with pharmacy managers to ensure that identified deficiencies from the annual physical security survey have been corrected.<sup>59</sup> This ensures security of medications stored in the pharmacy, protection of staff, and prevention of criminal loss or theft.

The Facility's Chief, Police and Security Service, identified two deficiencies related to the pharmacy during the June 2018 annual physical security survey. These deficiencies—door lock and motion intrusion system—were repeat findings from the March 2017 physical security survey. Failure to correct security deficiencies places the pharmacy at risk and vulnerable to potential loss or theft of medications. At the time of the OIG visit in July 2018, pharmacy managers were aware of the deficiencies but believed the deficiencies did not apply to the Facility's current pharmacy setting.

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<sup>59</sup> VA Handbook 0730, *Security and Law Enforcement*, August 11, 2000.

## Recommendation 4

4. The Facility Director ensures that all deficiencies identified on the Annual Physical Security Survey are addressed and monitors compliance.

Facility concurred.

Target date for completion: January 31, 2019

Facility response: The pharmacy motion alarm system was installed in 2012 during building construction. However, the sirens (sounding devices) were not installed at that location. The alarm system was recently transitioned to a new alarm monitoring system, which is currently experiencing issues with the activating/setting of alarms. In order to mitigate this, we are going to contract with an outside alarm monitoring system which will notify VA Police when an alarm is activated. The estimated completion is January 2019. The pharmacy is currently under 24/7 camera surveillance with monitoring by VA Police. VA Police also conduct random foot patrol surveillance in the area at minimum once per shift.

The Facility Safety Officer has determined that the door locks are compliant according to NFPA 101,7.2.1.5.2. This item was closed as of July 12, 2018. However, that was not reflected in the documents submitted to OIG during their visit. Further discussion with OIG reviewer indicated that we have sufficiently addressed the issue regarding door locks.

The Chief, VA Police and Security Service is responsible for working with Bio-Medical Service until the issues with the motion alarm system have been corrected. Status updates will be reported to the Executive Leadership Board (ELB) quarterly until the deficiency has been corrected.

## Controlled Substances Area Inspections: Patterns of Inspections

VHA requires that monthly inspections be scheduled randomly to ensure the element of surprise.<sup>60</sup> For 4 of 10 areas selected, the OIG noted that CSIs conducted inspections during the last three business days of the month.<sup>61</sup> Conducting monthly inspections consistently around the same days of each month removes the element of surprise and may potentially allow drug diversion activities. The CSC stated that the CSIs conducted inspections at the end of the month due to insufficient number of CSIs and competing priorities.

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<sup>60</sup> VHA Directive 1108.02(1).

<sup>61</sup> October 31 and December 28, 2017; and February 26, 2018.

## Recommendation 5

5. The Facility Director ensures controlled substance monthly inspection dates are randomly selected to avoid distinguishable patterns and monitors compliance.

Facility concurred.

Target date for completion: March 31, 2019

Facility response: The CSC will ensure that the CSIs are conducting the required inspections randomly as outlined in VHA Directive 118.02(1).

The CSC will report compliance monitoring to the Quality, Safety, Value Council and the Executive Leadership Board (ELB) until 90% compliance is achieved for 2 consecutive quarters.

### **Controlled Substances Area Inspections: Reconciliation of Dispensing and Return of Stock for One Random Day**

VHA requires CS inspectors to reconcile the stocking/refilling from the pharmacy to every automated dispensing cabinet and the return of stock to pharmacy from every automated dispensing cabinet for one random day during CS area inspections.<sup>62</sup> The reconciliation provides the opportunity to identify potential drug diversion activities and any discrepancies with refilling or returning CS.

The OIG found that reconciliation of stocking/refilling activities from pharmacy to automated dispensing cabinets was not conducted in 8 of 10 CS areas for the six months of inspection reports reviewed. The OIG also noted that staff only reconciled one CS although more than one CS was dispensed or refilled from the pharmacy. Additionally, the OIG found that the Facility did not reconcile returns to pharmacy stock in all 10 CS areas for the six months of inspection reports reviewed. Missed reconciliations may cause delays in identifying any potential diversion activities. The CSC perceived that reconciling one CS per area was sufficient and was unaware of the requirement of reconciling returns to pharmacy stock.

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<sup>62</sup> VHA Directive 1108.02(1).

## Recommendation 6

6. The Facility Director ensures that controlled substances inspectors perform reconciliation of controlled substance refills to automated dispensing cabinets in patient care areas and returns to pharmacy stock and monitors compliance.

Facility concurred.

Target date for completion: March 31, 2019

Facility response: The CSC will ensure that the CSIs are conducting the required inspections randomly as outlined in VHA Directive 118.02(1).

Target: The CSC will report compliance monitoring to the Quality, Safety, Value Council and the Executive Leadership Board (ELB) until 90% compliance is achieved for 2 consecutive quarters.

## Controlled Substances Area Inspections: Coordinator Conducting Routine Inspections

VHA requires CSIs to conduct monthly inspections of CS storage areas and for the CSC to refrain from conducting these routine inspections.<sup>63</sup> This ensures that the CSC focuses on program oversight activities, such as preparing monthly inspection summaries and quarterly trend reports, resolving all discrepancies until completion, and training new CSIs. In all 10 areas selected for review, the OIG noted that the CSC conducted routine bimonthly inspections.<sup>64</sup> When the CSC conducts frequent monthly inspections, program oversight may be compromised. The CSC was aware of the requirement and stated that the Facility had insufficient number of CSIs to perform required monthly inspections of all CS areas.

## Recommendation 7

7. The Facility Director ensures that controlled substances inspectors complete routine monthly controlled substance inspections and monitors compliance.

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<sup>63</sup> VHA Directive 1108.02(1).

<sup>64</sup> The CSC conducted bimonthly inspections in four inpatient units (6 East, 6 West, intensive care, and MH 2E), interventional radiology, endocrinology and cardiac catheterization procedure areas, post-anesthesia care unit, operating room 7, and the Emergency Department.

Facility concurred.

Target date for completion: March 31, 2019

Facility response: The CSC will appoint and train an adequate number of CSIs to perform required monthly inspections of all CS areas. This will allow the CSC to focus on program oversight activities.

The CSC will report compliance monitoring to the Quality, Safety, Value Council and the Executive Leadership Board (ELB) until 90% compliance is achieved for 2 consecutive quarters.

## Mental Health: 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; or learning about unexpected or violent death, serious harm, or threat of death or injury experienced by a family member or other close associate.”<sup>65</sup> 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.<sup>66</sup>

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.<sup>67</sup> 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.<sup>68</sup>

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
- Referral for diagnostic evaluation

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<sup>65</sup> VHA Handbook 1160.03, *Programs for Veterans with Post-Traumatic Stress Disorder (PTSD)*, March 12, 2010 (rescinded November 16, 2017.)

<sup>66</sup> VHA Handbook 1160.03.

<sup>67</sup> 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.

<sup>68</sup> Department of Veterans Affairs, Information Bulletin, *Clarification of Posttraumatic Stress Disorder Screening Requirements*, August 6, 2015.

- 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.<sup>69</sup> 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.<sup>70</sup> 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.<sup>71</sup>

In 1999, the Veterans Millennium Benefits and Healthcare Act mandated that the veterans' standard benefits package include access to GE.<sup>72</sup> 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.<sup>73</sup> 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.<sup>74</sup>

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 43 randomly selected patients who received a GE from July 1, 2016, through June 30, 2017. The OIG evaluated the following performance indicators:

- Referral for diagnostic evaluation
- 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

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<sup>69</sup> VHA Directive 1140.04, *Geriatric Evaluation*, November 28, 2017.

<sup>70</sup> VHA Directive 1140.04.

<sup>71</sup> 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.

<sup>72</sup> Public Law 106-117.

<sup>73</sup> VHA Directive 1140.11, *Uniform Geriatrics and Extended Care Services in VA Medical Centers and Clinics*, October 11, 2016.

<sup>74</sup> 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 was compliant with provision of clinical care and geriatric management. However, the OIG identified a deficiency with program evaluation that warranted a recommendation.

## Program Evaluation

VHA requires program evaluation and performance improvement activities specific to patients receiving GE.<sup>75</sup> This provides the opportunity to identify practice improvements, ensures appropriate actions were taken, and measures the effectiveness of actions on a regular basis.

The OIG noted that program staff collected Home Based Primary Care (HBPC) PI data related to infections, falls, and patient satisfaction. However, data collected were not specific to patients receiving GE, and the OIG found no other evidence of program evaluation or performance improvement activities for the GE program. Absence of collecting and evaluating GE activities may cause delay in addressing GE issues and implementing appropriate action plans. Program managers perceived that HBPC PI data collection met the requirement.

## Recommendation 8

8. The Facility Director ensures that Geriatrics and Extended Care Service leaders conduct and report geriatric evaluation program performance improvement activities to an appropriate leadership board and monitors compliance.

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<sup>75</sup> VHA Directive 1140.04.

Facility concurred.

Target date for completion: March 31, 2019

Facility response: Geriatric and Extended Care Service (GEC) will select a minimum of two metrics specific to patients 65 years and older referred to GEC and data will be presented quarterly as stated below.

The data will be presented to Medical Executive Board quarterly beginning 2<sup>nd</sup> quarter FY19 and will be monitored for a minimum of two consecutive quarters (1<sup>st</sup> and 2<sup>nd</sup> quarters FY 2019) to ensure full compliance with the evaluation and reporting requirements.

## 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.<sup>76</sup> Timely screening, diagnosis, notification, and treatment are essential to early detection and optimal patient outcomes.

The Veteran's Health Care Amendments of 1983 mandated VA provide veterans with preventive care, including breast cancer screening.<sup>77</sup> The Veterans Health Care Act of 1992 also authorized VA to provide gender-specific services including mammography services to eligible women veterans.<sup>78</sup>

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. Communication with patients must be documented.<sup>79</sup>

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 50 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
- Performance of follow-up mammogram if indicated

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<sup>76</sup> U.S. Breast Cancer Statistics. <http://www.BreastCancer.org>. (Website accessed on May 18, 2017.)

<sup>77</sup> VHA Handbook 1105.03, *Mammography Program Procedures and Standards*, April 28, 2011 (Handbook rescinded and replaced with VHA Directive 1105.03, *Mammography Program Procedures and Standards*, May 21, 2018).

<sup>78</sup> Veterans Health Care Act of 1992, Title I, Publ L. 102-585 (1992).

<sup>79</sup> VHA Directive 1330.01(2), *Health Care Services for Women Veterans*, February 15, 2017 (amended September 8, 2017, and further amended July 24, 2018).

- Performance of follow-up study<sup>80</sup>

## Conclusion

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

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<sup>80</sup> This performance indicator did not apply to this Facility.

## 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.<sup>81</sup> 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,”<sup>82</sup> 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.<sup>83</sup>

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.”<sup>84</sup>

Infections occurring on or after the third calendar day following admission to an inpatient location are considered “healthcare-associated.”<sup>85</sup> 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.<sup>86</sup>

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 25 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

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<sup>81</sup> TJC. Infection Prevention and Control standard IC.01.03.01.

<sup>82</sup> Association for Professionals in Infection Control and Epidemiology, *Guide to Preventing Central Line-Associated Bloodstream Infections*, 2015.

<sup>83</sup> These are vessels that enter and leave the heart—superior and inferior vena cava, pulmonary artery, pulmonary vein, aorta.

<sup>84</sup> The Centers for Disease Control and Prevention, *Guidelines for the Prevention of Intravascular Catheter-Related Infections*, 2011.

<sup>85</sup> 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.

<sup>86</sup> 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 OIG found general compliance 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"> <li>• Executive leadership stability and engagement</li> <li>• Employee satisfaction and patient experience</li> <li>• Accreditation/for-cause surveys and oversight inspections</li> <li>• Indicators for possible lapses in care</li> <li>• VHA performance data</li> </ul>	Eight OIG recommendations, ranging from documentation issues to deficiencies that can lead to patient and staff safety issues or adverse events, are attributable to the Director, Chief of Staff, and 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"> <li>• Protected peer review of clinical care</li> <li>• UM reviews</li> <li>• Patient safety incident reporting and RCAs</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
Credentialing and Privileging	<ul style="list-style-type: none"> <li>• Medical licenses</li> <li>• Privileges</li> <li>• FPPEs</li> <li>• OPPEs</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• Focused Professional Practice Evaluations. include clearly delineated timeframes.</li> </ul>

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Environment of Care	<ul style="list-style-type: none"> <li>• Parent Facility               <ul style="list-style-type: none"> <li>○ EOC rounds and deficiency tracking</li> <li>○ Infection prevention</li> <li>○ General safety</li> <li>○ Environmental cleanliness</li> <li>○ General and exam room privacy</li> <li>○ Availability of medical equipment and supplies</li> </ul> </li> <li>• CBOC               <ul style="list-style-type: none"> <li>○ General safety</li> <li>○ Medication safety and security</li> <li>○ Infection prevention</li> <li>○ Environmental cleanliness</li> <li>○ General and exam room privacy</li> <li>○ Availability of medical equipment and supplies</li> </ul> </li> <li>• Locked MH Unit               <ul style="list-style-type: none"> <li>○ Bi-annual MH EOC rounds</li> <li>○ Nursing station security</li> <li>○ Public area and general unit safety</li> <li>○ Patient room safety</li> <li>○ Infection prevention</li> <li>○ Availability of medical equipment and supplies</li> </ul> </li> <li>• Emergency Management               <ul style="list-style-type: none"> <li>○ Hazard Vulnerability Analysis (HVA)</li> <li>○ Emergency Operations Plan (EOP)</li> <li>○ Emergency power testing and availability</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• VA Police regularly test panic alarms at the Northwest Las Vegas VA Clinic.</li> <li>• VA Police test panic alarms and document response time to alarm testing in the locked MH unit.</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Medication Management	<ul style="list-style-type: none"> <li>• CSC reports</li> <li>• Pharmacy operations</li> <li>• Annual physical security survey</li> <li>• CS ordering processes</li> <li>• Inventory completion during Chief of Pharmacy transition</li> <li>• Review of balance adjustments</li> <li>• CSC requirements</li> <li>• CSI requirements</li> <li>• CS area inspections</li> <li>• Pharmacy inspections</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• Deficiencies identified on the Annual Physical Security Survey are addressed.</li> <li>• CS monthly inspections dates are randomly selected to avoid distinguishable patterns.</li> <li>• CSIs perform reconciliation of CS refills to automated dispensing cabinets in patient care areas and returns to pharmacy stock.</li> <li>• CSIs complete routine monthly CS inspections.</li> </ul>
Mental Health: Posttraumatic Stress Disorder Care	<ul style="list-style-type: none"> <li>• Suicide risk assessment</li> <li>• Offer of further diagnostic evaluation</li> <li>• Referral for diagnostic evaluation</li> <li>• Completion of diagnostic evaluation</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
Long-term Care: Geriatric Evaluations	<ul style="list-style-type: none"> <li>• Provision of or access to geriatric evaluation</li> <li>• Program oversight and evaluation requirements</li> <li>• Geriatric evaluation requirements</li> <li>• Geriatric management requirements</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• Geriatrics and Extended Care Service leaders conduct and report geriatric evaluation program performance improvement activities to an appropriate leadership board.</li> </ul>
Women's Health: Mammography Results and Follow-up	<ul style="list-style-type: none"> <li>• Result linking</li> <li>• Report scanning and content</li> <li>• Communication of results and recommended actions</li> <li>• Follow-up mammograms and studies</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

<b>Healthcare Processes</b>	<b>Performance Indicators</b>	<b>Critical Recommendations for Improvement</b>	<b>Recommendations for Improvement</b>
High-risk Processes: Central Line-associated Bloodstream Infections	<ul style="list-style-type: none"><li>• Policy and infection prevention risk assessment</li><li>• Committee discussion</li><li>• Infection incidence data</li><li>• Education and educational materials</li><li>• Policy, procedure, and checklist for insertion and maintenance of central venous catheters</li></ul>	<ul style="list-style-type: none"><li>• None</li></ul>	<ul style="list-style-type: none"><li>• None</li></ul>

## Appendix B: Facility Profile and VA Outpatient Clinic Profiles

### Facility Profile

The table below provides general background information for this high complexity (1b)<sup>87</sup> affiliated<sup>88</sup> Facility reporting to VISN 21.

**Table 7. Facility Profile for Las Vegas (593)  
(October 1, 2014, through September 30, 2017)**

Profile Element	Facility Data FY 2015 <sup>89</sup>	Facility Data FY 2016 <sup>90</sup>	Facility Data FY 2017 <sup>91</sup>
Total Medical Care Budget in Millions	\$485.5	\$502.0	\$527.7
Number of:			
• Unique Patients	57,383	59,361	61,694
• Outpatient Visits	797,804	857,295	892,172
• Unique Employees <sup>92</sup>	1,890	1,910	1,988
Type and Number of Operating Beds:			
• Medicine	45	45	45
• Mental Health	20	20	20
• Rehab Medicine	20	0	0
• Surgery	25	25	25
Average Daily Census:			
• Medicine	51	57	54
• Mental Health	17	17	16
• Rehab Medicine	5	0	0
• Surgery	6	5	7

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.

<sup>87</sup> The VHA medical centers are classified according to a facility complexity model; 1b designation indicates a Facility with medium-high volume, high-risk patients, many complex clinical programs, and medium-large research and teaching programs.

<sup>88</sup> Associated with a medical residency program.

<sup>89</sup> October 1, 2014, through September 30, 2015.

<sup>90</sup> October 1, 2015, through September 30, 2016.

<sup>91</sup> October 1, 2016, through September 30, 2017.

<sup>92</sup> Unique employees involved in direct medical care (cost center 8200).

## VA Outpatient Clinic Profiles<sup>93</sup>

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 8 provides information relative to each of the clinics.

**Table 8. VA Outpatient Clinic Workload/Encounters<sup>94</sup> 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 <sup>95</sup> Provided	Diagnostic Services <sup>96</sup> Provided	Ancillary Services <sup>97</sup> Provided
Pahrump, NV	593GC	7,194	2,669	Dermatology Neurology	n/a	Pharmacy Social Work Nutrition
Las Vegas, NV	593GD	31,632	8,741	Dermatology Gastroenterology Neurology General Surgery	Radiology	Pharmacy Social Work Weight Management Nutrition

<sup>93</sup> Includes all outpatient clinics in the community that were in operation as of February 15, 2018.

<sup>94</sup> An encounter is a professional contact between a patient and a practitioner vested with responsibility for diagnosing, evaluating, and treating the patient’s condition.

<sup>95</sup> Specialty care services refer to non-PC and non-MH services provided by a physician.

<sup>96</sup> Diagnostic services include EKG, EMG, laboratory, nuclear medicine, radiology, and vascular lab services.

<sup>97</sup> Ancillary services include chiropractic, dental, nutrition, pharmacy, prosthetic, social work, and weight management services.

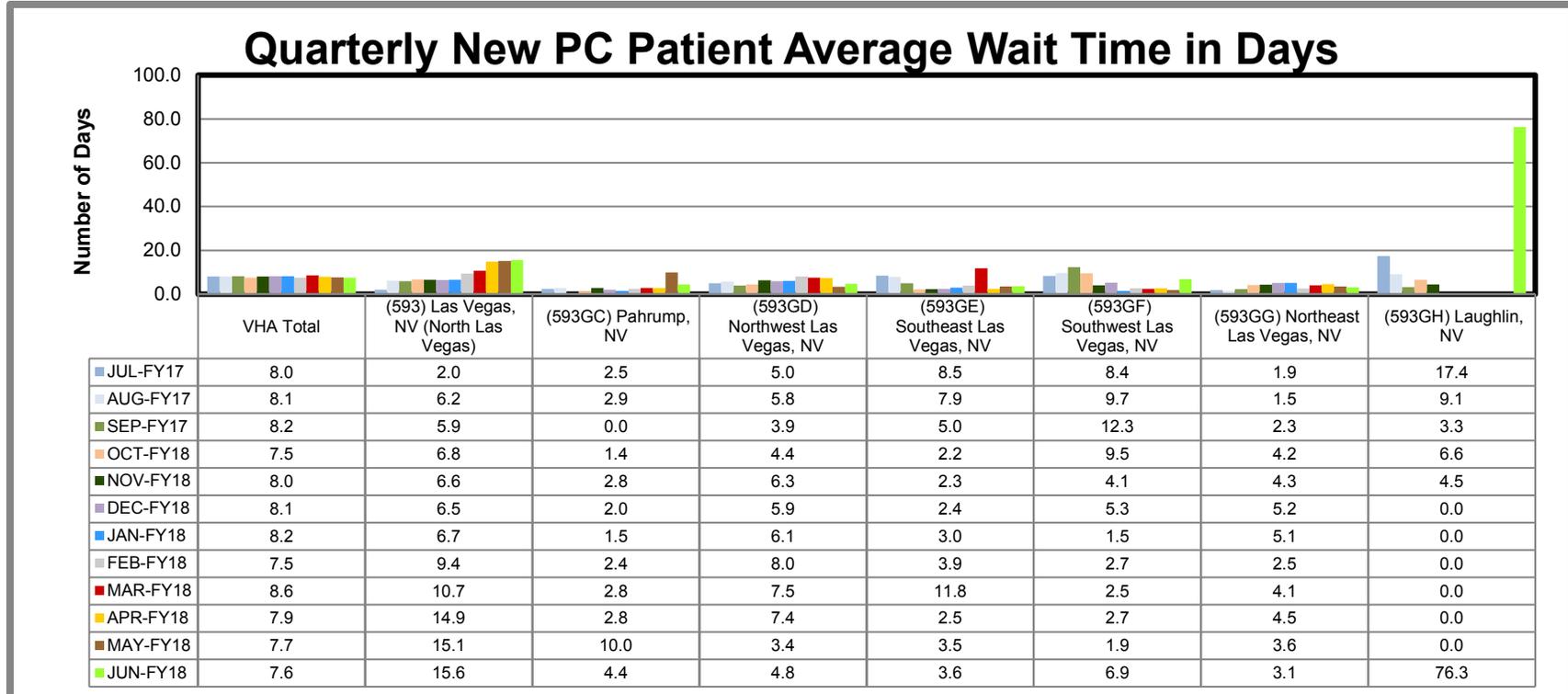
Location	Station No.	PC Workload/ Encounters	MH Workload/ Encounters	Specialty Care Services <sup>95</sup> Provided	Diagnostic Services <sup>96</sup> Provided	Ancillary Services <sup>97</sup> Provided
Henderson, NV	593GE	24,960	8,022	Dermatology Neurology	Radiology	Pharmacy Social Work Nutrition
Las Vegas, NV	593GF	26,963	11,577	Dermatology Gastroenterology Neurology	Radiology	Pharmacy Social Work Weight Management Nutrition
Las Vegas, NV	593GG	22,226	8,950	Dermatology Gastroenterology Neurology	EKG Radiology	Pharmacy Social Work Nutrition
Laughlin, NV	593GH	3,557	156	Dermatology Neurology	n/a	Pharmacy
North Las Vegas, NV	593QC	n/a	853	n/a	n/a	n/a

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 Metrics<sup>98</sup>



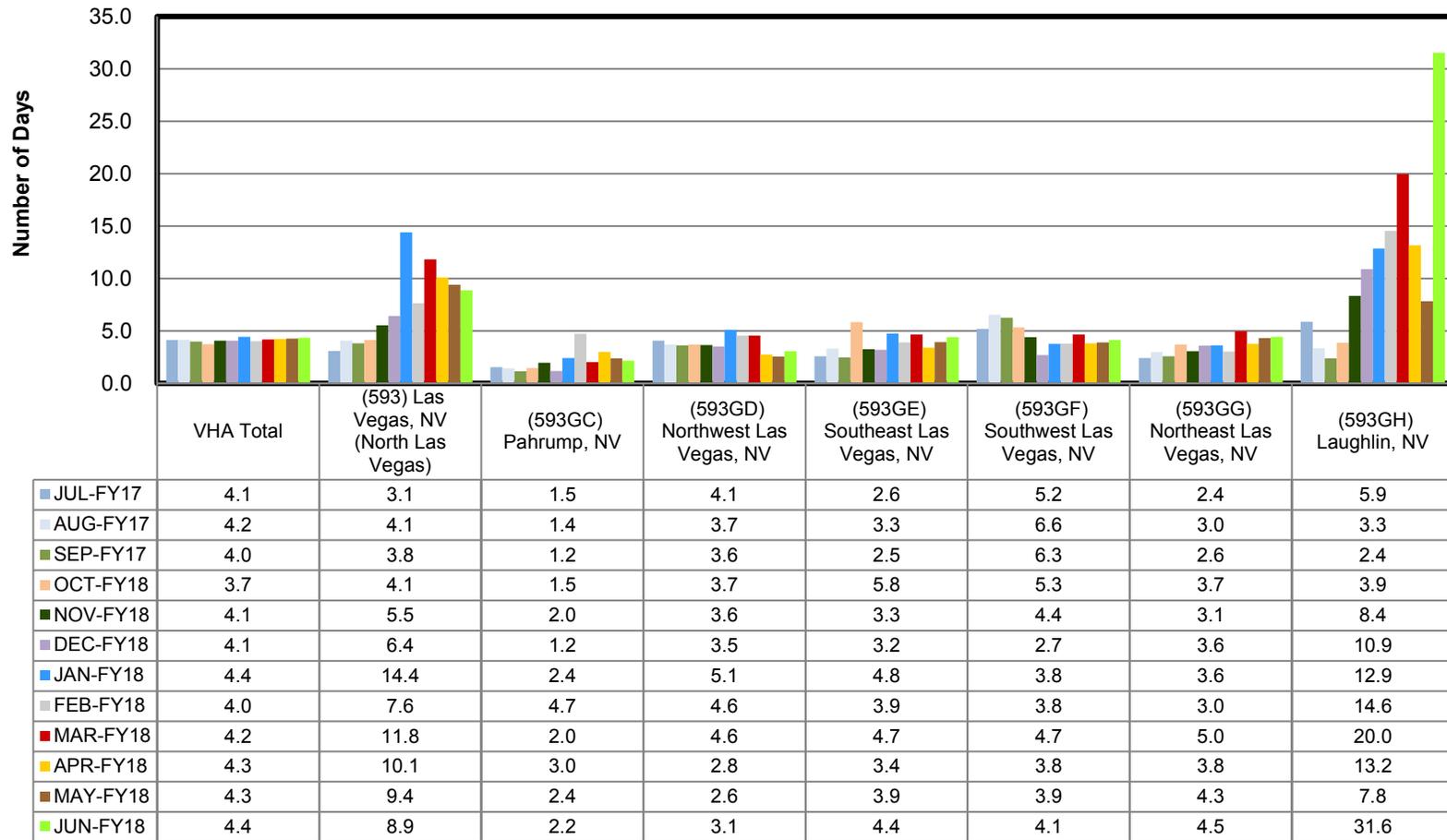
Source: VHA Support Service Center

Note: The OIG did not assess VA's data for accuracy or completeness. The OIG omitted North Las Vegas, NV (593QC), as no workload/encounters or services were reported. The OIG has on file the Facility's explanation for the increased wait times for the Laughlin CBOC.

**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.

<sup>98</sup> Department of Veterans Affairs, Patient Aligned Care Teams Compass Data Definitions, accessed September 11, 2017.

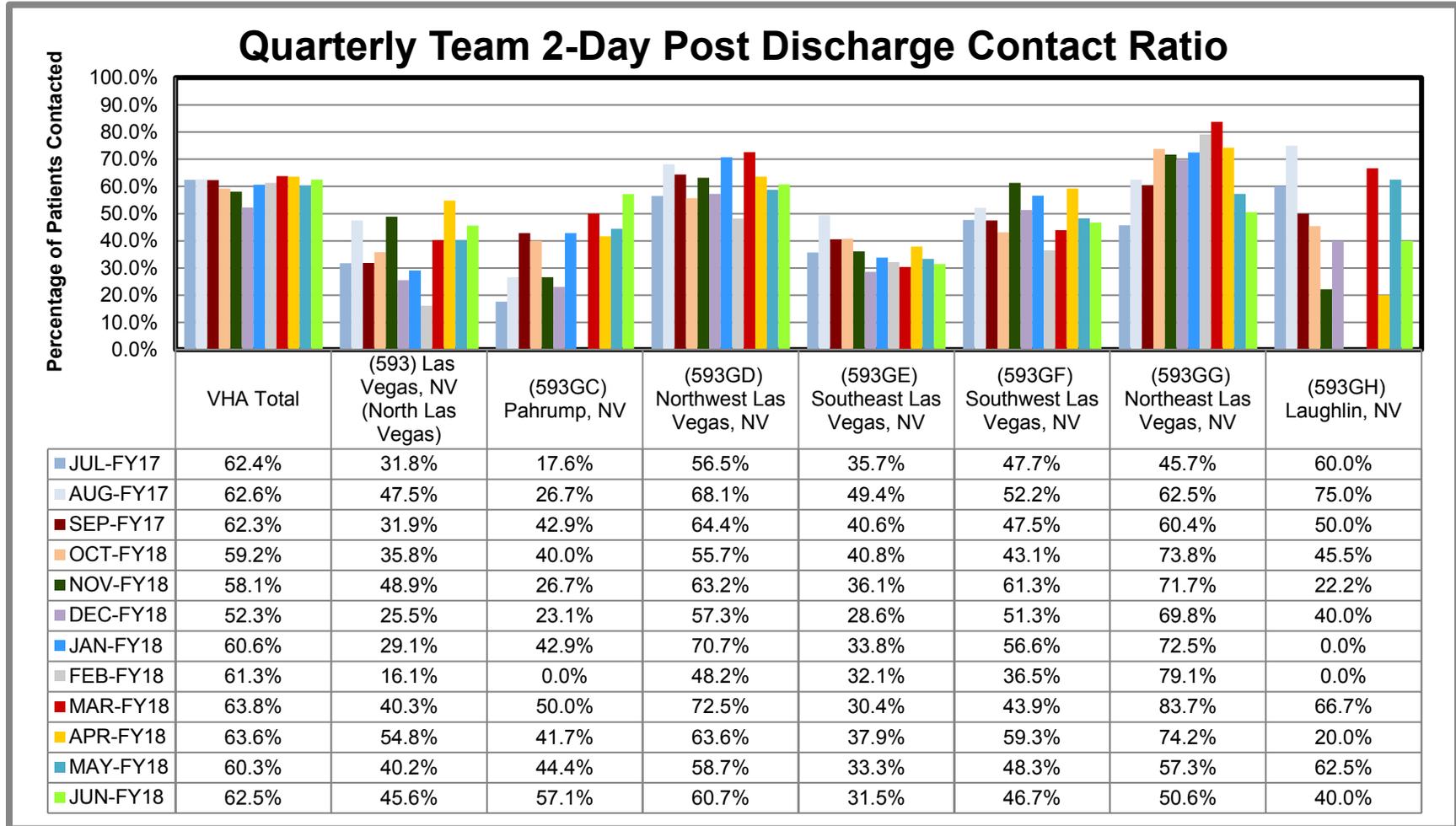
### Quarterly Established PC Patient Average Wait Time in Days



Source: VHA Support Service Center

Note: The OIG did not assess VA’s data for accuracy or completeness. The OIG omitted North Las Vegas, NV (593QC), as no workload/encounters or services were reported.

**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.

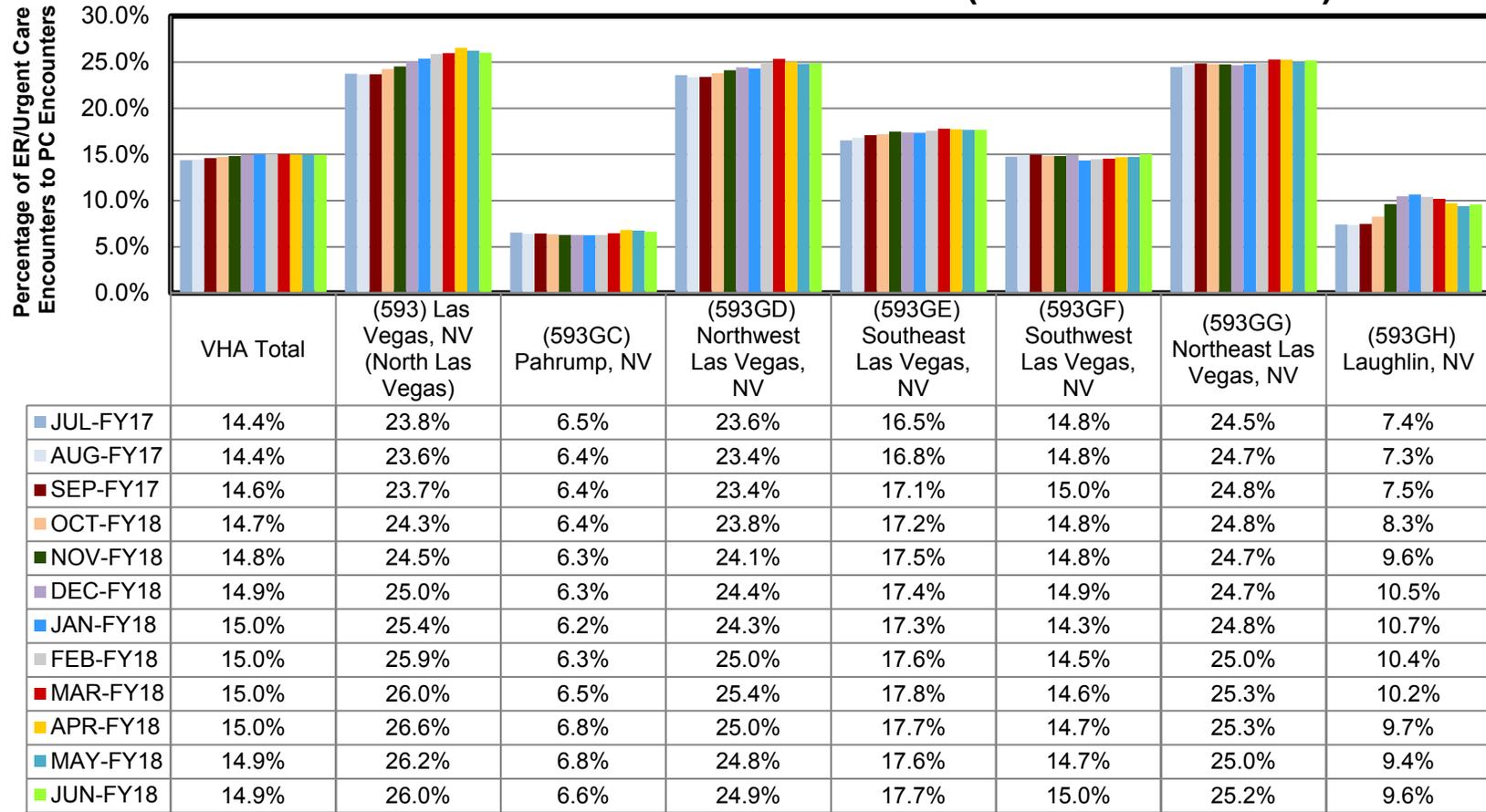


Source: VHA Support Service Center

Note: The OIG did not assess VA's data for accuracy or completeness. The OIG omitted North Las Vegas, NV (593QC), as no data workload/encounters or services were reported.

**Data Definition:** The percent of assigned PC patients discharged from any VA facility who have been contacted by a PC team member within two business days during the reporting period. Patients are excluded if they are discharged from an observation specialty and/or readmitted within two 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."

### Quarterly Ratio of ER/Urgent Care Encounters While on Panel to PC Encounters While on Panel (FEE ER Excluded)



Source: VHA Support Service Center

Note: The OIG did not assess VA’s data for accuracy or completeness. The OIG omitted North Las Vegas, NV (593QC), as no workload/encounters or services were reported.

**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 Definitions<sup>99</sup>

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

<sup>99</sup> 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: November 8, 2018

From: Director, Sierra Pacific Network (10N21)

Subj: CHIP Review of the VA Southern Nevada Healthcare System, North Las Vegas, NV

To: Director, Los Angeles Office of Healthcare Inspections (54LA)

Director, GAO/OIG Accountability Liaison (VHA 10E1D MRS Action)

1. I have reviewed the draft report and concur with the findings and recommendations made by the CHIP team. The Las Vegas Health Care System has provided their response and I concur with all their actions being taken to correct the findings.
2. Should you have any questions please contact my office.

*(Original signed by:)*

John Brandecker

*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: Facility Director Comments

### Department of Veterans Affairs Memorandum

Date: November 6, 2018

From: Director, VA Southern Nevada Healthcare System (593/00)

Subj: CHIP Review of the VA Southern Nevada Healthcare System, North Las Vegas, NV

To: Director, Sierra Pacific Network (10N21)

1. We appreciate the opportunity to review the draft report of recommendations for the OIG CHIP Review conducted at the VA Southern Nevada Healthcare System during July 9-July 13, 2018.
2. Please find the attached response to each recommendation included in the report. We have completed, or in the process of completing, actions to resolve these issues.

*(Original signed by:)*

Tracy L. Skala  
Associate Director

For Peggy W. Kearns, MS, FACHE

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

## OIG Contact and Staff Acknowledgments

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**Contact**

For more information about this report, please contact the Office of Inspector General at (202) 461-4720.

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