

Department of Veterans Affairs Office of Inspector General

Office of Healthcare Inspections

Report No. 13-03419-90

Community Based Outpatient Clinic and Primary Care Clinic Reviews at Atlanta VA Medical Center Decatur, Georgia

March 17, 2014

Washington, DC 20420

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

Glossary AUD alcohol use disorder CBOC community based outpatient clinic DWHP designated women's health provider EHR electronic health record EOC environment of care MH mental health MI motivational interviewing MM medication management NM not met OIG Office of Inspector General PACT Patient Aligned Care Teams PCC primary care clinic PCMM Primary Care Management Module RN registered nurse VHA Veterans Health Administration VISN Veterans Integrated Service Network WΗ women's health

Table of Contents

P Executive Summary	age i
Objectives, Scope, and Methodology	
Objectives	1
Scope	1
Methodology	1
Results and Recommendations	3
EOC	
AUD	5
MM	7
DWHP Proficiency	8
Appendixes	
A. CBOC Profiles and Services Provided	9
B. PACT Compass Metrics	11
C. VISN Director Comments	15
D. Facility Director Comments	16
E. OIG Contact and Staff Acknowledgments	
E Poport Distribution	

F.	Report Distribution	19
G.	Endnotes	20

Executive Summary

Review Purpose: The purpose of the review was to evaluate selected patient care activities to determine whether the community based outpatient clinics (CBOCs) and primary care clinics (PCCs) provide safe, consistent, and high-quality health care for our veterans. We conducted a site visit during the week of November 18, 2013, at the Trinka Davis Veterans Village CBOC, Carrollton, GA, which is under the oversight of the Atlanta VA Medical Center and Veterans Integrated Service Network 7.

Review Results: We conducted four focused reviews and had no findings for the Medication Management and the Designated Women's Health Providers' Proficiency reviews. However, we made recommendations in the following two review areas:

Environment of Care. Ensure that panic alarms are tested and testing is documented.

Alcohol Use Disorder. Ensure that CBOC/PCC:

- Staff consistently complete diagnostic assessments for patients with a positive alcohol screen.
- Registered Nurse Care Managers receive motivational interviewing and health coach training within 12 months of appointment to Patient Aligned Care Teams.

Comments

The VISN and Facility Directors agreed with the CBOC and PCC review findings and recommendations and provided acceptable improvement plans. (See Appendixes C and D, pages 15–17, for the full text of the Directors' comments.) We will follow up on the planned actions until they are completed.

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

Objectives, Scope, and Methodology

Objectives

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

- Determine whether the CBOCs are compliant with EOC requirements.
- Determine whether CBOCs/PCCs are compliant with VHA requirements in the care of patients with AUD.
- Determine compliance with requirements for the clinical oversight and patient education of fluoroquinolones for outpatients.
- Evaluate if processes are in place for DWHPs to maintain proficiency in WH.

Scope

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

- EOC
- AUD
- MM
- DWHP Proficiency

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

Methodology

The onsite EOC inspection was only conducted at a randomly selected CBOC that had not been previously inspected.^a Details of the targeted study populations for the AUD, MM, and DWHP Proficiency focused reviews are noted in Table 1.

^a Includes 93 CBOCs in operation before March 31, 2013.

Review Topic	Study Population
AUD	All CBOC and PCC patients screened within the study period
	of July 1, 2012, through June 30, 2013, and who had a positive
	AUDIT-C score ^b and all providers and RN Care Managers
	assigned to PACT prior to October 1, 2012.
MM	All outpatients with an original prescription ordered for one of
	the three selected fluoroquinolones from July 1, 2012, through
	June 30, 2013.
DWHP Proficiencies	All WH primary care providers designated as DWHPs as of
	October 1, 2012, and who remained as DWHPs until
	September 30, 2013.

Table 1. CBOC Focused Reviews and St	tudy Populations
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In this report, we make recommendations for improvement. Recommendations pertain to issues that are significant enough to be monitored by the OIG until corrective actions are implemented.

The review was done in accordance with OIG standard operating procedures for CBOC and PCC reviews.

^b The AUDIT-C is a brief alcohol screen that reliably identifies patients who are hazardous drinkers or have active alcohol use disorders. Scores range from 0-12.

Results and Recommendations

EOC

The purpose of this review was to evaluate whether CBOC managers have established and maintained a safe and clean EOC as required.¹

We reviewed relevant documents and conducted a physical inspection of the CBOC. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement.

Table 2. EOC

NM	Areas Reviewed	Findings
	The CBOC's location is clearly identifiable	
	from the street as a VA CBOC.	
	The CBOC has interior signage available that	
	clearly identifies the route to and location of	
	the clinic entrance.	
	The CBOC is Americans with Disabilities Act	
	accessible.	
	The furnishings are clean and in good repair.	
	The CBOC is clean.	
	The CBOC maintains a written, current	
	inventory of hazardous materials and waste	
	that it uses, stores, or generates.	
Х	An alarm system and/or panic buttons are	The testing of the alarm system was not
	installed in high-risk areas (e.g., MH clinic).	performed and documented.
	Alcohol hand wash or soap dispenser and	
	sink are available in the examination rooms.	
	Sharps containers are secured.	
	Safety needle devices are available.	
	The CBOC has a separate storage room for	
	storing medical (infectious) waste.	
	The CBOC conducts fire drills at least every	
	12 months.	
	Means of egress from the building are	
	unobstructed.	
	Access to fire alarm pull stations is	
	unobstructed.	
	Access to fire extinguishers is unobstructed.	
	The CBOC has signs identifying the locations	
	of fire extinguishers.	
L	Exit signs are visible from any direction.	
	No expired medications were noted during the	
	onsite visit.	

NM	Areas Reviewed (continued)	Findings
	Personally identifiable information is protected	
	on laboratory specimens during transport so	
	that patient privacy is maintained.	
	Adequate privacy is provided to patients in	
	examination rooms.	
	Documents containing patient-identifiable	
	information are visible or unsecured.	
	Window coverings provide privacy.	
	The CBOC has a designated examination	
	room for women veterans.	
	Adequate privacy is provided to women	
	veterans in the examination room.	
	The information technology network	
	room/server closet is locked.	
	All computer screens are locked when not in	
	use.	
	Staff use privacy screens on monitors to	
	prevent unauthorized viewing in high-traffic	
	areas.	
	EOC rounds are conducted semi-annually (at	
	least twice in a 12-month period).	l
	The CBOC has an automated external	
	defibrillator.	l
	Safety inspections are performed on the	
	CBOC medical equipment in accordance with	
	Joint Commission standards.	1
	The parent facility includes the CBOC in	
	required education, training, planning, and	
	participation leading up to the annual disaster	
	exercise.	<u></u>
	The parent facility's Emergency Management	
	Committee evaluates CBOC emergency	
	preparedness activities, participation in annual	
	disaster exercise, and staff training/education	
	relating to emergency preparedness	
	requirements.	1

Recommendations

1. We recommended that panic alarms are tested and testing is documented.

AUD

The purpose of this review was to determine whether the facility's CBOCs and PCCs complied with selected alcohol use screening and treatment requirements.²

We reviewed relevant documents. We also reviewed 40 EHRs and validated findings with key managers and staff. The table below shows the areas reviewed for this topic. The areas marked as NM did not meet applicable requirements and needed improvement.

Table 3. AUD

NM	Areas Reviewed	Findings
	Alcohol use screenings are completed during new patient encounters, and at least annually.	
X	Diagnostic assessments are completed for patients with a positive alcohol screen.	Staff did not complete diagnostic assessments for 6 (15 percent) of 40 patients who had positive alcohol use screens.
	Education and counseling about drinking levels and adverse consequences of heavy drinking are provided for patients with positive alcohol screens and drinking levels above National Institute on Alcohol Abuse and Alcoholism guidelines.	
	Documentation reflects the offer of further treatment for patients diagnosed with alcohol dependence.	
	For patients with AUD who decline referral to specialty care, CBOC/PCC staff monitored them and their alcohol use.	
	Counseling, education, and brief treatments for AUD are provided within 2 weeks of positive screening.	
Х	CBOC/PCC RN Care Managers have received MI training within 12 months of appointment to PACT.	We found that 17 (35 percent) of 48 RN Care Managers did not receive MI training within 12 months of appointment to PACT.
Х	CBOC/PCC RN Care Managers have received National Center for Health Promotion and Disease Prevention approved health coaching training (most likely TEACH for Success) within 12 months of appointment to PACT.	We found that 17 (35 percent) of 48 RN Care Managers did not receive health coaching training within 12 months of appointment to PACT.
	The facility complied with any additional elements required by VHA or local policy.	

Recommendations

2. We recommended that CBOC/PCC staff consistently complete diagnostic assessments for patients with a positive alcohol screen.

3. We recommended that CBOC/PCC RN Care Managers receive MI and health coaching training within 12 months of appointment to PACT.

MM

The purpose of this review was to determine whether appropriate clinical oversight and education were provided to outpatients prescribed oral fluoroquinolone antibiotics.³

We reviewed relevant documents. We also reviewed 40 EHRs and validated findings with key managers and staff. The table below shows the areas reviewed for this topic. The facility generally met requirements. We made no recommendations.

Table 4. Fluoroquinolones

NM	Areas Reviewed	Findings
	Clinicians documented the medication	
	reconciliation process that included the	
	fluoroquinolone.	
	Written information on the patient's prescribed	
	medications was provided at the end of the	
	outpatient encounter.	
	Medication counseling/education for the	
	fluoroquinolone was documented in the	
	patients' EHRs.	
	Clinicians documented the evaluation of each	
	patient's level of understanding for the	
	education provided.	
	The facility complied with local policy.	

DWHP Proficiency

The purpose of this review was to determine whether the facility's CBOCs and PCCs complied with selected DWHP proficiency requirements.⁴

We reviewed the facility self-assessment, VHA and local policies, PCMM data, and supporting documentation for DWHPs' proficiencies. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement.

Table 5. DWHP Proficiency

Areas Reviewed	Findings
CBOC and PCC DWHPs maintained	
proficiency requirements.	
CBOC and PCC DWHPs were designated	Thirteen DWHPs were noted as Women's
with the WH indicator in the PCMM.	Wellness providers and not designated with the WH indicator in the PCMM.
	CBOC and PCC DWHPs maintained proficiency requirements. CBOC and PCC DWHPs were designated

The facility made the required WH designations in PCMM for CBOC and PCC DWHPs during the week of our review. We verified the updated information on November 26, 2013. Therefore, we did not make a recommendation.

Appendix A

CBOC Profiles

This review evaluates the quality of care provided to veterans at all of the CBOCs under the parent facility's oversight.^c The table below provides information relative to each of the CBOCs.

						Uniq	lues ^d			Encou	Inters ^d	
Location	State	Station #	Locality ^e	CBOC Size ^f	MH ^g	PC ^h	Other ⁱ	All	МН ^а	PC ^h	Other ⁱ	All
Lawrenceville (Gwinnett County)	GA	508GH	Urban	Large	1,364	8,131	5,017	8,608	5,972	15,347	13,251	34,570
East Point	GA	508GA	Urban	Large	1,154	6,728	5,783	8,027	5,619	16,823	18,837	41,279
Stockbridge	GA	508GG	Urban	Large	1,111	6,032	5,756	7,101	6,421	11,846	23,649	41,916
Austell	GA	508GF	Urban	Large	1,096	5,982	4,963	6,780	5,990	12,273	16,854	35,117
NE Georgia/ Oakwood	GA	508GE	Urban	Large	467	5,104	2,822	5,204	2,935	14,474	6,825	24,234
Newnan	GA	508GI	Urban	Mid-Size	704	3,773	2,913	4,316	3,602	8,277	7,534	19,413
Carrollton	GA	508GK	Rural	Mid-Size	449	1,692	2,349	2,750	1,860	3,583	7,896	13,339
Blairsville	GA	508GJ	Rural	Mid-Size	556	2,560	1,569	2,708	3,184	5,945	4,268	13,397

^c Includes all CBOCs in operation before March 31, 2013.

^d Unique patients and Total Encounters – Source: MedSAS outpatient files; completed outpatient appointments indicated by a valid stop code during the July 1, 2012, through June 30, 2013, timeframe at the specified CBOC.

^e http://vaww.pssg.med.va.gov/PSSG/DVDC/FY2013_Q1_VAST.xlsx

^f Based on the number of unique patients seen as defined by VHA Handbook 1160.01, Uniform Mental Health Services in VA Medical Centers and Clinics, September 11, 2008, the size of the CBOC facility is categorized as very large (> 10,000), large (5,000-10,000), mid-size (1,500-5,000), or small (< 1,500).

^g Mental Health includes stop codes in the 500 series, excluding 531 and 563, in the primary position.

^h Primary Care includes the stop code list in the primary position: 323 – Primary Care; 322 – Women's Clinic; 348 – Primary Care Group; 350 – Geriatric Primary Care; 531 – MH Primary Care Team-Individual; 563 – MH Primary care Team-Group; 170 – Home Based Primary Care (HBPC) Physician.

ⁱ All other non-Primary Care and non-MH stop codes in the primary position.

CBOC Services Provided

In addition to primary care integrated with WH and MH care, the CBOCs provide various specialty care, ancillary, and tele-health services. The following table lists the services provided at each CBOC.^j

Свос	Specialty Care Services ^k	Ancillary Services ¹	Tele-Health Services ^m
Lawrenceville (Gwinnett County)	Women's Cancer Care Dermatology	Diabetic Retinal Screening Pharmacy Nutrition MOVE! Program ⁿ	Tele Primary Care
East Point	Anti-Coagulation Clinic	Pharmacy Diabetic Retinal Screening Nutrition MOVE! Program	Tele Primary Care
Stockbridge	Anti-Coagulation Clinic Dermatology Women's Cancer Care	Pharmacy MOVE! Program Diabetic Retinal Screening	Tele Primary Care
Austell	Dermatology	Pharmacy Diabetic Retinal Screening	Tele Primary Care
NE Georgia/Oakwood	Dermatology	Diabetic Retinal Screening Nutrition	Tele Primary Care
Newnan	Dermatology	Pharmacy Diabetic Retinal Screening MOVE! Program Nutrition	Tele Primary Care
Carrollton	Dental Optometry Anti-Coagulation Clinic Podiatry	Audiology Rehabilitation Pharmacy Nutrition Diabetic Retinal Screening	Tele Primary Care
Blairsville	Dermatology	Nutrition Pharmacy Diabetic Retinal Screening MOVE! Program	Tele Primary Care

^J Source: MedSAS outpatient files; the denoted Specialty Care and Ancillary Services are limited to Primary Clinic Stops with a count \geq 100 encounters during the July 1, 2012, through June 30, 2013, timeframe at the specified CBOC.

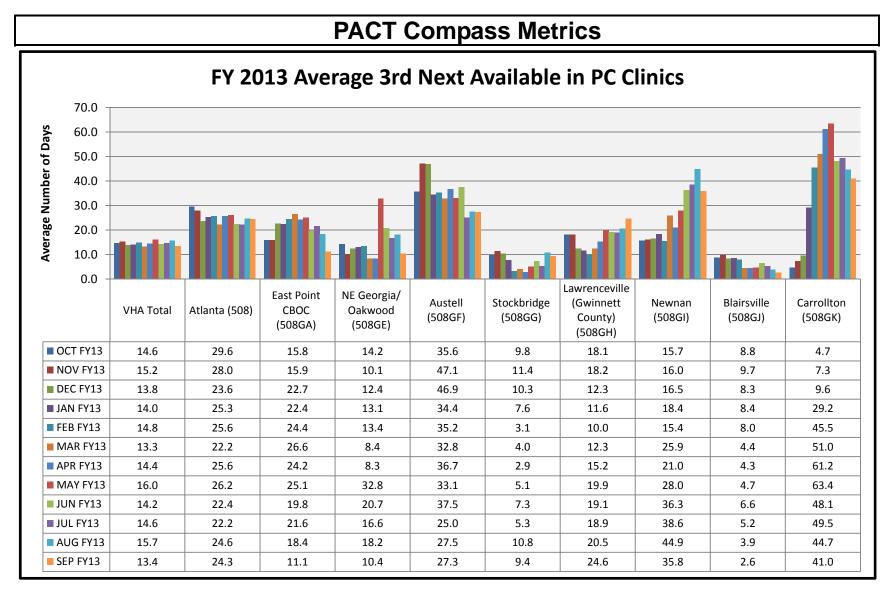
^k Specialty Care Services refer to non-Primary Care and non-Mental Health services provided by a physician.

¹Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.

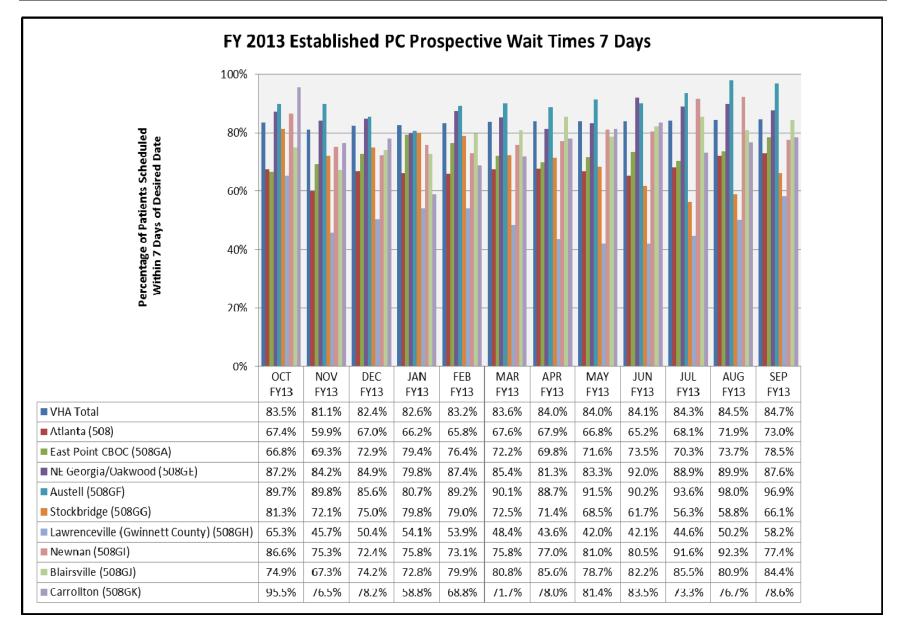
^m Tele-Health Services refer to services provided under the VA Telehealth program (http://www.telehealth.va.gov/)

ⁿ VHA Handbook 1120.01, MOVE! Weight Management Program for Veterans, March 31, 2011.

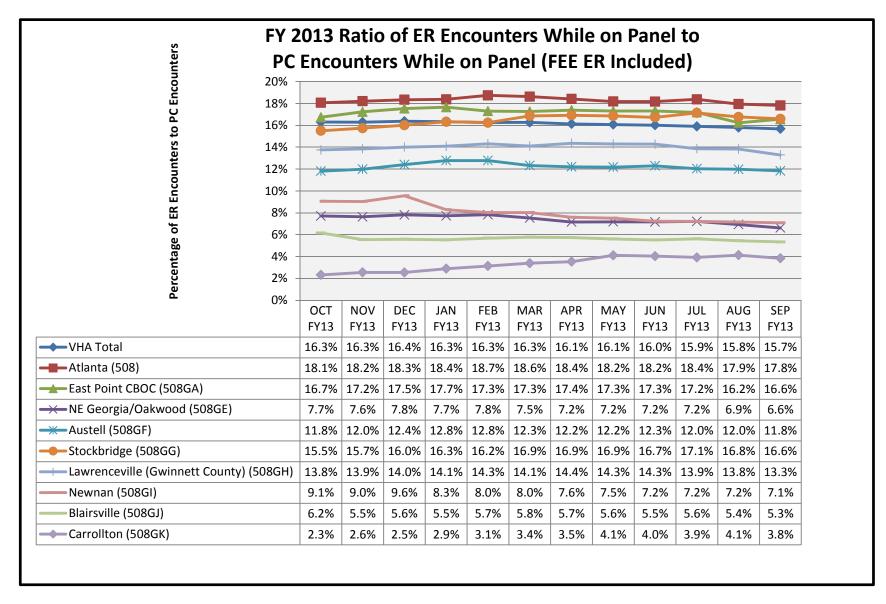
Appendix B



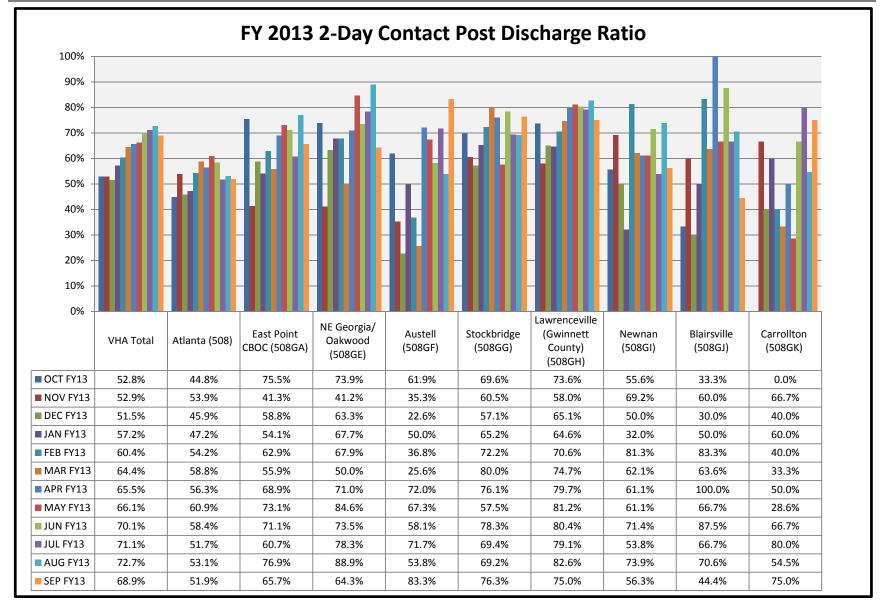
Data Definition.⁵ The average waiting time in days until the next third open appointment slot for completed primary care appointments in stop code 350. Completed appointments in stop code 350 for this metric include completed appointments where a 350 stop code is in the primary position on the appointment or one of the telephone stop codes is in the primary position, and 350 stop code is in the secondary position. The data is averaged from the national to the division level.



Data Definition.⁵ The percent of patients scheduled within 7 days of the desired date. Data source is the Wait Times Prospective Wait Times measures. The total number of scheduled appointments for primary care-assigned patients in primary care clinics 322, 323 and 350. Data is collected twice a month on the 1st and the 15th. Data reported is for the data pulled on the 15th of the month. There is no FY to date score for this measure.



Data Definition.⁵ This is a measure of where the patient receives his or her primary care and by whom. A low percentage is better. The formula is the total VHA ER/Urgent Care/FEE ER Encounters WOP (including FEE ER visits) *divided by* the number of primary care encounters WOP with the patient's assigned primary care (or associate) provider plus the total VHA ER/Urgent Care/FEE ER Encounters (including FEE ER visits) WOP plus the number of primary care encounters WOP with a provider other than the patient's PCP/AP.



Data Definition.⁵ Total Discharges Included in 2-day Contact Post Discharge Ratio: The total VHA and FEE Inpatient Discharges for assigned primary care patients for the reporting timeframe. Discharges resulting in death and discharges where a patient is readmitted within 2 days of discharge are excluded from this metric.

VISN Director Comments

 Date: January 31, 2014 From: Director, VISN 7 (10N7) Subject: CBOC and PCC Reviews of the Atlanta VA Medical Center, Decatur, GA To: Director, Atlanta Office of Healthcare Inspections (54AT) Acting Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC) 1. I concur with the Atlanta VA Medical Center's responses and action plans as detailed within this report. VISN 7 will provide oversight and support to ensure that all actions are implemented and sustained. 2. If you have any questions or require additional information please contact Dr. Robin Hindsman, VISN QMO at 678-924-5723. (original signed by:) Charles E. Sepich, FACHE 		artment of erans Affairs	Memorandum
 Subject: CBOC and PCC Reviews of the Atlanta VA Medical Center, Decatur, GA To: Director, Atlanta Office of Healthcare Inspections (54AT) Acting Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC) 1. I concur with the Atlanta VA Medical Center's responses and action plans as detailed within this report. VISN 7 will provide oversight and support to ensure that all actions are implemented and sustained. 2. If you have any questions or require additional information please contact Dr. Robin Hindsman, VISN QMO at 678-924-5723. 	Date:	January 31, 2014	
 Center, Decatur, GA To: Director, Atlanta Office of Healthcare Inspections (54AT) Acting Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC) 1. I concur with the Atlanta VA Medical Center's responses and action plans as detailed within this report. VISN 7 will provide oversight and support to ensure that all actions are implemented and sustained. 2. If you have any questions or require additional information please contact Dr. Robin Hindsman, VISN QMO at 678-924-5723. 	From:	Director, VISN 7 (10N7)	
 Acting Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC) 1. I concur with the Atlanta VA Medical Center's responses and action plans as detailed within this report. VISN 7 will provide oversight and support to ensure that all actions are implemented and sustained. 2. If you have any questions or require additional information please contact Dr. Robin Hindsman, VISN QMO at 678-924-5723. 	Subject:		ews of the Atlanta VA Medical
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contact Dr. Robin Hindsman, VISN QMO at 678-924-5723.	plans as	s detailed within this report.	VISN 7 will provide oversight and
Charles E. Sepich, FACHE			
	(original s	signed by:)	

Facility Director Comments

Department of Veterans Affairs Memorandum			
Date:	January 27, 2014		
From:	Director, Atlanta VA I	Medical Center (508/00)	
Subject:	CBOC and PCC F Center, Decatur, GA	Reviews of the Atlanta VA Medica	l
То:	Director, VA Southea	st Network (10N7)	
Inspec	 I concur with all of the findings and recommendations of the Office of Inspector General Community Based Outpatient Clinic (CBOC) and Primary Care Reviews at the Atlanta VA Medical Center, Decatur, GA. 		
	 Thank you for the opportunity to review the draft report. Attached are the facility actions taken as a result of these findings. 		
(origina	l signed by:)		
	Wiggins		
	or, Atlanta VA Medical Ce	enter (508/00)	

Comments to OIG's Report

The following Director's comments are submitted in response to the recommendations in the OIG report:

OIG Recommendations

Recommendation 1. We recommended that panic alarms are tested and testing is documented.

Concur

Target date for completion: Completed: January 24, 2014

Facility response: The Atlanta VA Police Service performs system-wide monthly testing of panic alarms including the Trinka Davis Veterans Village. The results of the panic alarm testing are documented and filed into a healthcare system-wide database.

Recommendation 2. We recommended that staff consistently complete diagnostic assessments for patients with a positive alcohol screen.

Concur

Target date for completion: Completed: December 22, 2013

Facility response: The Primary Care Service Line developed the standard operating procedure (SOP) that includes nursing staff providing veterans scoring a positive score on Audit C screen, with an educational alcohol brochure at intake. The Clinicians will perform brief alcohol counselling and intervention with the help of the clinical reminder. Review of Medical records indicated compliance with the SOP. The Primary Care Service Line Performance Improvement Coordinator will continue to monitor medical records monthly for compliance of brief alcohol counselling for positive Audit C screens.

Recommendation 3. We recommended that CBOC/PCC RN Care Managers receive MI and health coaching training within 12 months of appointment to PACT.

Concur

Target date for completion: Completed: January 17, 2014

Facility response: All RN Care Managers associated with CBOCs received MI and health coaching as per the handbook. To maintain compliance, the Health Promotion Disease Prevention (HPDP) Program Manager and Health Behavior Coordinator will continue to work closely with the CBOC Operations Managers to identify RN Care Managers needing training. All new CBOC/PCC RN Care Managers will be scheduled to attend the MI and TEACH training within 12 months of appointment to PACT.

Contact	For more information about this report, please contact the OIG at (202) 461-4720.	
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OIG Contact and Staff Acknowledgments

Report Distribution

VA Distribution

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House Committee on Oversight and Government Reform
Senate Committee on Veterans' Affairs
Senate Appropriations Subcommittee on Military Construction, Veterans Affairs, and Related Agencies
Senate Committee on Homeland Security and Governmental Affairs
National Veterans Service Organizations
Government Accountability Office
Office of Management and Budget
U.S. Senate: Saxby Chambliss, Johnny Isakson
U.S. House of Representatives: Henry C. "Hank" Johnson Jr., John Lewis, Tom Price, Lynn A. Westmoreland

This report is available at <u>www.va.gov/oig</u>.

Endnotes

¹ References used for the EOC review included:

- US Access Board, Americans with Disabilities Act Accessibility Guidelines (ADAAG), September 2, 2002.
- US Department of Health and Human Services, Health Insurance Portability and Accountability Act, *The Privacy Rule*, August 14, 2002.
- US Department of Labor, Occupational Safety and Health Administration, Laws and Regulations.
- US Department of Labor, Occupational Safety and Health Administration, *Guidelines for Preventing Workplace Violence*, 2004.
- Joint Commission, Joint Commission Comprehensive Accreditation and Certification Manual, July 1, 2013.
- VA Directive 0324, Test, Training, Exercise, and Evaluation Program, April 5, 2012.
- VA Directive 0059, VA Chemicals Management and Pollution Prevention, May 25, 2012.
- VA Handbook 6500, Risk Management Framework for VA Information System, September 20, 2012.
- VHA Center for Engineering, Occupational Safety, and Health, *Emergency Management Program Guidebook*, March 2011.
- VHA Center for Engineering, Occupational Safety, and Health, *Online National Fire Protection Association Codes, Standards, Handbooks, and Annotated Editions of Select Codes and Standards*, July 9, 2013.
- VHA Deputy Under Secretary for Health for Operations and Management, Memorandum: *Environmental Rounds*, March 5, 2007.
- VHA Directive 2011-007, Required Hand Hygiene Practices, February 16, 2011.
- VHA Directive 2012-026, Sexual Assaults & Other Defined Public Safety Incidents in VHA Facilities, September 27, 2012.
- VHA Handbook 1006.1, Planning and Activating Community-Based Outpatient Clinics, May 19, 2004.
- VHA Handbook 1330.01, Health Care Services for Women Veterans, May 21, 2010.
- VHA Handbook 1850.05, Interior Design Operations and Signage, July 1, 2011.

² References used for the AUD review included:

- National Center for Health Promotion and Disease Prevention (NCP), Veteran Health Education and Information (NVEI) Program, *Patient Education: TEACH for Success*. Retrieved from http://www.prevention.va.gov/Publications/Newsletters/2013/HealthPOWER Prevention_News_Winter_2012_2 013 FY12 TEACH MI Facilitator Training.asp on January 17, 2014.
- VHA Handbook 1120.02, Health Promotion Disease Prevention (HPDP) Program, July 5, 2012.
- VHA Handbook 1160.01, Uniform Mental Health Services in VA Medical Centers and Clinics, September 11, 2008.

³ References used for the Medication Management review included:

- VHA Directive 2011-012, Medication Reconciliation, March 9, 2011.
- VHA Directive 2012-011, Primary Care Standards, April 11, 2012.
- VHA Handbook 1108.05, Outpatient Pharmacy Services, May 30, 2006.
- VHA Handbook 1108.07, *Pharmacy General Requirements*, April 17, 2008.
- Joint Commission, *Joint Commission Comprehensive Accreditation and Certification Manual*, July 1, 2013. ⁴ References used for the DWHP review included:
- VHA Deputy Under Secretary for Health for Operations and Management, Memorandum: *Health Care Services for Women Veterans*, Veterans Health Administration (VHA) Handbook 1330.01; Women's Health (WH) Primary Care Provider (PCP) Proficiency, July 8, 2013.
- VHA Handbook 1330.01 Health Care Services for Women Veterans, May 21, 2010.
- VHA Handbook 1100.19, Credentialing and Privileging, November 14, 2008.
- ⁵ Reference used for PACT Compass data graphs:
- Department of Veterans' Affairs, Patient Aligned Care Teams Compass Data Definitions, August 29, 2013.