

Department of Veterans Affairs Office of Inspector General

Office of Healthcare Inspections

Report No. 14-00242-160

Community Based Outpatient Clinic and Primary Care Clinic Reviews at W.G. (Bill) Hefner VA Medical Center, Salisbury, North Carolina

May 27, 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				
FY	fiscal year				
МН	mental health				
MM	medication management				
NM	not met				
OIG	Office of Inspector General				
PACT	Patient Aligned Care Teams				
PCC	primary care clinic				
PCP	primary care provider				
RN	registered nurse				
VHA	Veterans Health Administration				
VISN	Veterans Integrated Service Network				
WH	women's health				

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Executive Summary

Review Purpose: The purpose of the review was to evaluate selected patient care activities to determine whether the community based outpatient clinic (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 March 24, 2014, at the Charlotte, NC, CBOC which is under the oversight of the W.G. (Bill) Hefner VA Medical Center and Veterans Integrated Service Network 6.

Review Results: We conducted four focused reviews and had no findings for the Environment of Care and Designated Women's Health Provider reviews. However, we made recommendations in the following two review areas:

Alcohol Use Disorder. Ensure that CBOC/PCCs:

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

Medication Management. Ensure that CBOC/PCCs:

- Staff document that medication reconciliation was completed at each episode of care where the newly prescribed fluoroquinolone was administered, prescribed, or modified.
- Staff consistently provide written medication information that includes the fluoroquinolone.
- Staff provide medication counseling/education as required.

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 15–19, for the full text of the Directors' comments.) We will follow up on the planned actions until they are completed.

Alud, Vaight. M.

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.¹ Details of the targeted study populations for the AUD, MM, and DWHP Proficiency focused reviews are noted in Table 1.

¹ 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 ² 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	0
	and who remained as DWHPs until September 30, 2013.

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.

 $^{^{2}}$ 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.^a

We reviewed relevant documents and conducted a physical inspection of the Charlotte CBOC. The table below shows the areas reviewed for this topic. The facility generally met requirements. We made no recommendations.

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.	
	An alarm system and/or panic buttons are	
	installed and tested in high-risk areas (e.g.,	
	MH clinic).	
	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.	
	Exit signs are visible from any direction.	
	No expired medications were noted during the	
	onsite visit.	

NM	Areas Reviewed (continued)	Findings
	All medications are secured from	
	unauthorized access.	
	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 not laying around, 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) and	
	deficiencies are reported to and tracked by the EOC Committee until resolution.	
	The CBOC has an automated external	
	defibrillator.	
	Safety inspections are performed on the	
	CBOC medical equipment in accordance with	
	Joint Commission standards.	
	The parent facility includes the CBOC in	
	required education, training, planning, and	
	participation leading up to the annual disaster	
	exercise.	
	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.	

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.^b

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 14 (35 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 3 of 8 RN Care Managers did not receive MI training within 12 months of appointment to PACT.
X	CBOC/PCC RN Care Managers have received VHA 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 6 of 27 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

1. We recommended that CBOC/Primary Care Clinic staff consistently complete diagnostic assessments for patients with a positive alcohol screen.

2. We recommended that CBOC/Primary Care Clinic Registered Nurse Care Managers receive motivational interviewing and health coaching training within 12 months of appointment to Patient Aligned Care Teams.

MM

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

We reviewed relevant documents. We also reviewed 39 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 4. Fluoroquinolones

NM	Areas Reviewed	Findings			
X	Clinicians documented the medication reconciliation process that included the fluoroquinolone.	We did not find documentation that medication reconciliation included the newly prescribed fluoroquinolone in 17 (44 percent) of 39 patient EHRs.			
Х	Written information on the patient's prescribed medications was provided at the end of the outpatient encounter.	We did not find documentation that 13 (33 percent) of 39 patients received written information that included the fluoroquinolone.			
X	Medication counseling/education for the fluoroquinolone was documented in the patients' EHRs.	We did not find documentation of medication counseling that included the fluoroquinolone in 16 (41 percent) of 39 patients' EHRs.			
	Clinicians documented the evaluation of each patient's level of understanding for the education provided.				
	The facility complied with local policy.				

Recommendations

3. We recommended that staff document that medication reconciliation was completed at each episode of care where the newly prescribed fluoroquinolone was administered, prescribed, or modified.

4. We recommended that staff consistently provide written medication information that includes the fluoroquinolone.

5. We recommended that staff provide medication counseling/education as required.

DWHP Proficiency

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

We reviewed the facility self-assessment, VHA and local policies, Primary Care Management Module data, and supporting documentation for DWHPs' proficiencies. The table below shows the areas reviewed for this topic. The facility generally met requirements. We made no recommendations.

Table 5. DWHP Proficiency

NM	Areas Reviewed	Findings
	CBOC and PCC DWHPs maintained	
	proficiency requirements.	
	CBOC and PCC DWHPs were designated	
	with the WH indicator in the Primary Care	
	Management Module.	

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.³ The table below provides information relative to each of the CBOCs.

						Uniq	ues ⁴			Encou	inters ⁴	
Location	State	Station #	Locality ⁵	CBOC Size ⁶	MH ⁷	PC ⁸	Other ⁹	All	MH ⁷	PC ⁸	Other ⁹	All
Charlotte	NC	659GA	Urban	Very Large	5,571	20,426	21,464	23,442	35,627	64,300	113,690	213,617
Winston-Salem	NC	659BY	Urban	Very Large	4,951	18,179	20,963	23,178	21,329	53,281	91,640	166,250
Hickory	NC	659GB	Urban	Large	1,905	7,144	6,256	8,339	8,918	23,195	22,909	55,022

Primary Care; 531 – MH Primary Care Team-Individual; 563 – MH Primary care Team-Group; 170 – Home Based Primary Care (HBPC) Physician.

⁹ All other non-Primary Care and non-MH stop codes in the primary position.

³ Includes all CBOCs in operation before March 31, 2013.

⁴ 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.

⁵ http://vaww.pssg.med.va.gov/PSSG/DVDC/FY2013_Q1_VAST.xlsx

⁶ 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).

⁷ Mental Health includes stop codes in the 500 series, excluding 531 and 563, in the primary position.

⁸ Primary Care includes the stop code list in the primary position: 323 – Primary Care; 322 – Women's Clinic; 348 – Primary Care Group; 350 – Geriatric

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.¹⁰

СВОС	Specialty Care Services ¹¹	Ancillary Services ¹²	Tele-Health Services ¹³
Charlotte	Optometry	Laboratory	Tele Primary Care
	Podiatry	Radiology	
	Gastroenterology	Audiology	
	Urology	Computer Tomography	
	Medicine Specialties	Electrocardiography	
	Dermatology	Pharmacy	
	Cardiology	Diabetic Retinal Screening	
	Surgery	MOVE! Program ¹⁴	
	General Surgery	Pulmonary Function Test	
	Women's Cancer Care	Nutrition	
	Pulmonary	Chaplain	
	Nephrology	VIST ¹⁵	
	Rheumatology	Positron Emission Tomography	
	Neurology		
	Ophthalmology		
	Pain Clinic		
Winston-Salem	Optometry	Laboratory	Tele Primary Care
	Podiatry	Radiology	
	Dermatology	Audiology	
	General Surgery	Pharmacy	
	Ear, Nose and Throat	Diabetic Retinal Screening	
	Surgery	Nutrition	
	Ophthalmology	MOVE! Program	
	Infectious Disease	Pulmonary Function Test	
	Neurology	Diabetes Care	
	Women's Cancer Care	VIST	
	Endocrinology	Blind Rehabilitation	
	Medicine Specialties		
Hickory	Optometry	Laboratory	Tele Primary Care
-	Dermatology	Audiology	-
	Medicine Specialties	Pharmacy	
		Diabetic Retinal Screening	
		MOVE! Program	
		Nutrition	

¹⁰ 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.

¹¹ Specialty Care Services refer to non-Primary Care and non-Mental Health services provided by a physician.

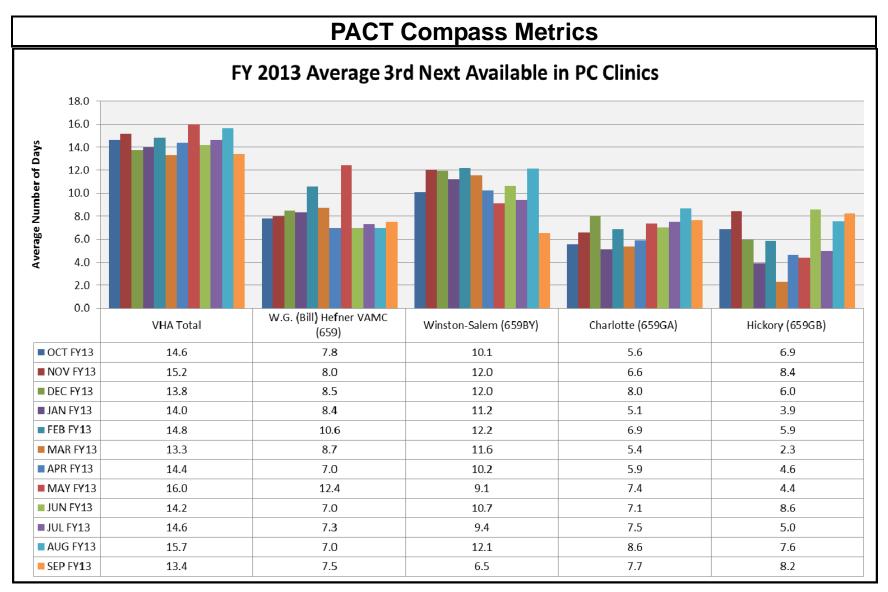
¹² Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.

¹³ Tele-Health Services refer to services provided under the VA Telehealth program (http://www.telehealth.va.gov/)

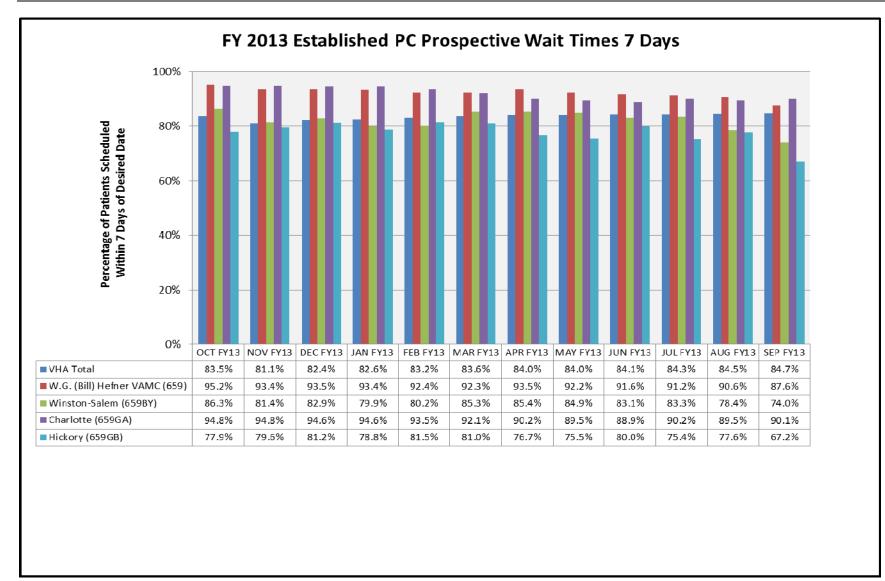
¹⁴ VHA Handbook 1120.01, *MOVE! Weight Management Program for Veterans*, March 31, 2011.

¹⁵ The Visual Impairment Services Team (VIST) is a group of case managers that coordinate services for severely disabled and visually impaired Veterans and active duty service members.

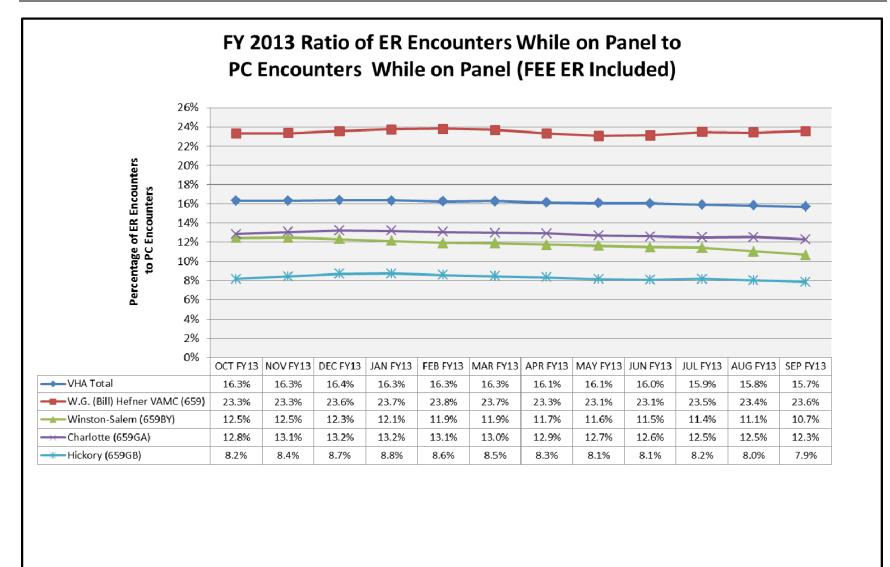
Appendix B



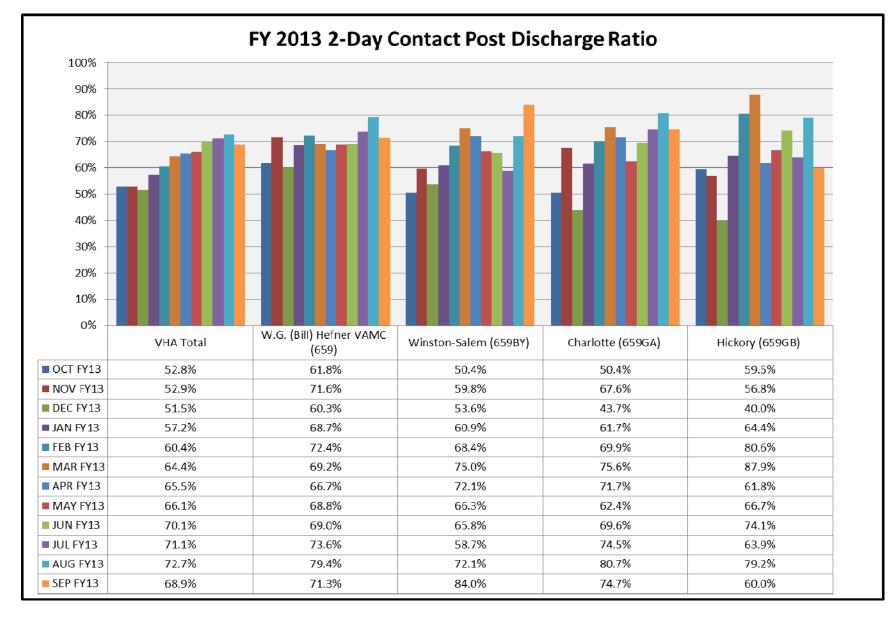
Data Definition.^e The average waiting time in days until the next third open appointment slot for completed primary care appointments in stop code 350. Completed appointments in stop code 350 for this metric include completed appointments where a 350 stop code is in the primary position on the appointment 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.^e 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.^e 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.^e 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: May 1, 2014 From: Director, VA Mid-Atlantic Healthcare Network (10N6) Subject: CBOC and PCC Reviews of the W.G. (Bill) Hefner VA Medical Center, Salisbury, NC To: Director, Atlanta Office of Healthcare Inspections (54AT) Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC) 1. The attached subject report is forwarded for your review and further action. I reviewed the response of the W. G. (Bill) Hefner VA Medical Center (VAMC), Salisbury, NC, and concur with the facility's recommendations. 2. If you have further questions, please contact Lisa Shear, VISN 6 QMO at (919) 956-5541. /es/ DANIEL F. HOFFMANN, FACHE 		artment of erans Affairs	Memorandum
 Subject: CBOC and PCC Reviews of the W.G. (Bill) Hefner VA Medical Center, Salisbury, NC To: Director, Atlanta Office of Healthcare Inspections (54AT) Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC) 1. The attached subject report is forwarded for your review and further action. I reviewed the response of the W. G. (Bill) Hefner VA Medical Center (VAMC), Salisbury, NC, and concur with the facility's recommendations. 2. If you have further questions, please contact Lisa Shear, VISN 6 QMO at (919) 956-5541. 	Date:	May 1, 2014	
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at (919) 956-5541. /es/	action.	I reviewed the response of	the W. G. (Bill) Hefner VA Medical
			d concur with the facility's
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Appendix D

Facility Director Comments

Department of Veterans Affairs		Memorandum
Date:	April 28, 2014	
From:	Director, W.G. (Bill) ⊦	lefner VA Medical Center (659/00)
Subject:	CBOC and PCC Re Medical Center, Sali	eviews of the W.G. (Bill) Hefner VA isbury, NC
То:	Director, VA Mid-Atla	ntic Healthcare Network (10N6)
	eviewed the draft report with the recommendatio	of the Office of Inspector General and I ns.
2. I have ir	ncluded my response in	the attached Director's Comments.
3. Please	contact me if you have a	any questions or comments.
/es/ Kaye Gree Director, W	n FACHE ⁄. G. (Bill) Hefner VA Me	dical Center (659/00)

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 CBOC/Primary Care Clinic staff consistently complete diagnostic assessments for patients with a positive alcohol screen.

Concur

Target date for completion: Completed 12/17/13

Facility response: The facility implemented a new clinical reminder in Dec 2013 that ensures that patients with a positive alcohol screen receive a complete diagnostic assessment. Staff was educated on the new clinical reminder and began using it in January 2013. At least 120 chart audits have been completed a month for the past three months and the facility has been at least 90% compliant each of those months. Audits will continue to be completed until closed by the OIG. Audit reports are reported monthly to the Clinical Executive Board for ongoing oversight.

Recommendation 2. We recommended that CBOC/Primary Care Clinic Registered Nurse Care Managers receive motivational interviewing and health coaching training within 12 months of appointment to Patient Aligned Care Teams.

Concur

Target date for completion: 6/6/14

Facility response: The facilities began offering more frequent training opportunities for motivational interviewing and health coaching training and strengthened the tracking mechanism to ensure RN Care Managers complete the training within 12 months of appointment to PACT. 100% of RN Care Managers have completed the MI training as of 4/16/14. 97.3% of RN Care Managers have completed the health coaching training as of 4/16/14. The rest of the RN Care Managers are scheduled to complete health coaching training in May 2014. The Chief Nurse of Primary Care will randomly audit the training records of RN Care Managers to ensure training is completed within 12 months of appointment to PACT. Results will be reported to the Nursing Executive Board for ongoing oversight.

Recommendation 3. We recommended that staff document that medication reconciliation was completed at each episode of care where the newly prescribed fluoroquinolone was administered, prescribed, or modified.

Concur

Target date for completion: 4/22/14

Facility response: The Chief of Staff Office reeducated providers that medication reconciliation must be completed at all outpatient visits per MCM 659-119-5 Medication Reconciliation. A sample of at least 30 electronic health records will be reviewed for presence of documentation that medication reconciliation occurred at each episode of care where fluoroquinolones were administered, prescribed, or modified. At least 30 electronic health records, from 30 unique patients, will be selected at random each month to ensure at least 90% compliance with documentation requirements. Results of the audit will be reported to the Clinical Executive Board and to the Executive Leadership Board for ongoing oversight.

Recommendation 4. We recommended that staff consistently provide written medication information that includes the fluoroquinolone.

Concur

Target date for completion: 4/22/14

Facility response: The prescriber will provide written medication information for all outpatients utilizing the Medication Reconciliation Note, which contains a medication list that includes the Fluoroquinolones when one is prescribed. In addition, Pharmacy Service will provide a printed copy of an FDA Medication Guide, which informs the patient in regards to what Fluoroquinolones are used for, how the medication should be taken with respect to food and other medications, as well as any associated precautions (i.e., potential drug-drug or drug food interactions, side effects, adverse events, and Black Box Warnings). A sample of at least 30 electronic health records will be reviewed for presence of documentation that written medication information was given where fluoroquinolones were administered, prescribed, or modified. At least 30 electronic health records, from 30 unique patients, will be selected at random each month to ensure at least 90% compliance with providing written medication information for fluoroquinolones. Results of the audit will be reported to the Clinical Executive Board and to the Executive Leadership Board for ongoing oversight.

Recommendation 5. We recommended that staff provide medication counseling/education as required.

Concur

Target date for completion: 4/22/14

Facility response: The prescriber will provide the necessary medication education/counseling for all patients, along with a Medication Reconciliation Note, which will document that the education/counseling has occurred. Pharmacy Service will provide a printed copy of a FDA Medication Guide, which informs the patient in regards to what Fluoroquinolones are used for, how the medication should be taken with respect to food and other medications, as well as any associated precautions (i.e., potential drug-drug or drug food interactions, side effects, adverse events, and Black Box

Warnings). A sample of at least 30 electronic health records will be reviewed for presence of documentation that written medication information was given and medication education was completed where fluoroquinolones were administered, prescribed, or modified. At least 30 electronic health records, from 30 unique patients, will be selected at random each month to ensure at least 90% compliance with patient medication education/counseling requirements. Results of the audit will be reported to the Clinical Executive Board and to the Executive Leadership Board for ongoing oversight.

Contact	For more information about this report, please contact the OIG at (202) 461-4720.
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	Zhana Johnson, CPA
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	Jennifer Reed, RN, MSHI
	Victor Rhee, MHS
	Patrick Smith, M. Stat
	Marilyn Stones, BS
	Mary Toy, RN, MSN
	Toni Woodard, BS
	Jarvis Yu, MS

OIG Contact and Staff Acknowledgments

Report Distribution

VA Distribution

Office of the Secretary Veterans Health Administration Assistant Secretaries General Counsel Director, VA Mid-Atlantic Healthcare Network (10N6) Director, W.G. (Bill) Hefner VA Medical Center (659/00)

Non-VA Distribution

House Committee on Veterans' Affairs
House Appropriations Subcommittee on Military Construction, Veterans Affairs, and Related Agencies
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: Richard Burr, Kay R. Hagan
U.S. House of Representatives: Virginia Foxx

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

Endnotes

^a References used for the EOC review included:

- US Access Board, Americans with Disabilities Act Accessibility Guidelines (ADAAG), September 2, 2002.
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