

Department of Veterans Affairs Office of Inspector General

Office of Healthcare Inspections

Report No. 14-00934-221

Community Based Outpatient Clinic and Primary Care Clinic Reviews at VA New York Harbor Healthcare System New York, New York

August 1, 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 MH mental health MI motivational interviewing MM medication management NA not applicable 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

	Page
Executive Summary	. i
Objectives, Scope, and Methodology	
Objectives	. 1
Scope	. 1
Methodology	. 1
Results and Recommendations	. 3
EOC	. 3
AUD	. 5
MM	. 6
DWHP Proficiency	
Appendixes	
A. CBOC Profiles and Services Provided	
B. PACT Compass Metrics	. 10
C. VISN Director Comments	. 14
D. Facility Director Comments	. 15
E. OIG Contact and Staff Acknowledgments	
F. Report Distribution	

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 June 9, 2014, at the Harlem CBOC, New York, NY, which is under the oversight of the VA New York Harbor Healthcare System and Veterans Integrated Service Network 3.

Review Results: We conducted four focused reviews and made recommendations in all of the review areas:

Environment of Care. Ensure that:

- Personally identifiable information is protected by securing laboratory specimens during transport from the Harlem CBOC to the parent facility.
- The information technology server closet at the Harlem CBOC is maintained according to information technology safety and security standards.

<u>Alcohol Use Disorder</u>. Ensure that CBOC/PCC 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/PCC staff:

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

Designated Women's Health Providers' Proficiency. Ensure that:

• All Designated Women's Health Providers are designated with the women's health indicator in the Primary Care Management Module.

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 14–18, for the full text of the Directors' comments.) We consider

recommendations 2 and 7 closed. We will follow up on the planned actions for the open recommendations 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.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.
ММ	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.

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 Harlem CBOC. The table below shows the areas reviewed for this topic. The areas marked as NM did not meet applicable requirements and needed improvement. Any items that did not apply to this facility are marked NA.

Table 2. EOC

NAThe CBOC's location is clearly identifiable from the street as a VA CBOC.NAThe CBOC has interior signage available that clearth identifies the most to end location of the	
NA The CBOC has interior signage available that	
ala anti-cial antification and a second la action of the	
clearly identifies the route to and location of the	
clinic entrance.	
NA 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.	
NA 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.	
All medications are secured from unauthorized	
access.	

NM	Areas Reviewed (continued)	Findings
Х	Personally identifiable information is protected	At the Harlem CBOC, personally identifiable
	on laboratory specimens during transport so that patient privacy is maintained.	information was not protected on laboratory specimens during transport.
	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.	
NA	The CBOC has a designated examination room	
	for women veterans.	
	Adequate privacy is provided to women	
	veterans in the examination room.	
Х	The information technology network	Access to the information technology network
	room/server closet is locked.	room/server closet at the Harlem CBOC was
		not documented.
	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.	

Recommendations

1. We recommended that managers ensure that personally identifiable information is protected by securing laboratory specimens during transport from the Harlem CBOC to the parent facility.

2. We recommended that the information technology server closet at the Harlem CBOC is maintained according to information technology safety and security standards.

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 30 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.	
	Diagnostic assessments are completed for patients with a positive alcohol screen.	
	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 6 (17 percent) of 35 RN Care Managers did not receive MI training within 12 months of appointment to PACT.
Х	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 7 (20 percent) of 35 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.	

Recommendation

3. We recommended that CBOC/PCC 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 22 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
Х	Clinicians documented the medication	We did not find documentation that medication
	reconciliation process that included the	reconciliation included the newly prescribed
	fluoroquinolone.	fluoroquinolone in 6 of 22 patients' EHRs.
Х	Written information on the patient's prescribed	We did not find documentation that
	medications was provided at the end of the	7 of 22 patients received written information that
	outpatient encounter.	included the fluoroquinolone.
Х	Medication counseling/education for the	We did not find documentation of medication
	fluoroquinolone was documented in the	counseling that included the fluoroquinolone in
	patients' EHRs.	5 of 22 patients' EHRs.
	Clinicians documented the evaluation of each	
	patient's level of understanding for the	
	education provided.	
	The facility complied with local policy.	

Recommendations

4. 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.

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

6. 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, 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

NM	Areas Reviewed	Findings
	CBOC and PCC DWHPs maintained	
	proficiency requirements.	
Х	CBOC and PCC DWHPs were designated	Four of 10 DWHPs were not designated with the
	with the WH indicator in the PCMM.	WH indicator in the PCMM.

Recommendation

7. We recommended that the chief of staff consistently ensure that all Designated Women's Health Providers are designated with the women's health 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	nters ⁴	
Location	State	Station #	Locality ⁵	CBOC Size ⁶	MH ⁷	PC ⁸	Other ⁹	All	MH ⁷	PC ⁸	Other ⁹	All
Chapel St	NY	630GC	Urban	Mid-Size	2,940	1,398	549	3,748	24,061	2,753	2,309	29,123
Staten Island	NY	630GB	Urban	Mid-Size	567	2,048	2,146	2,534	3,783	4,202	7,767	15,752
Harlem	NY	630GA	Urban	Small	678	400	541	1,229	3,512	958	1,022	5,492

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 October 1, 2012, through September 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
Chapel St		MOVE! Program ¹⁴	Tele Primary Care
Staten Island	Optometry Podiatry	MOVE! Program Social Work Nutrition Electrocardiography	Tele Primary Care
Harlem			Tele Primary Care

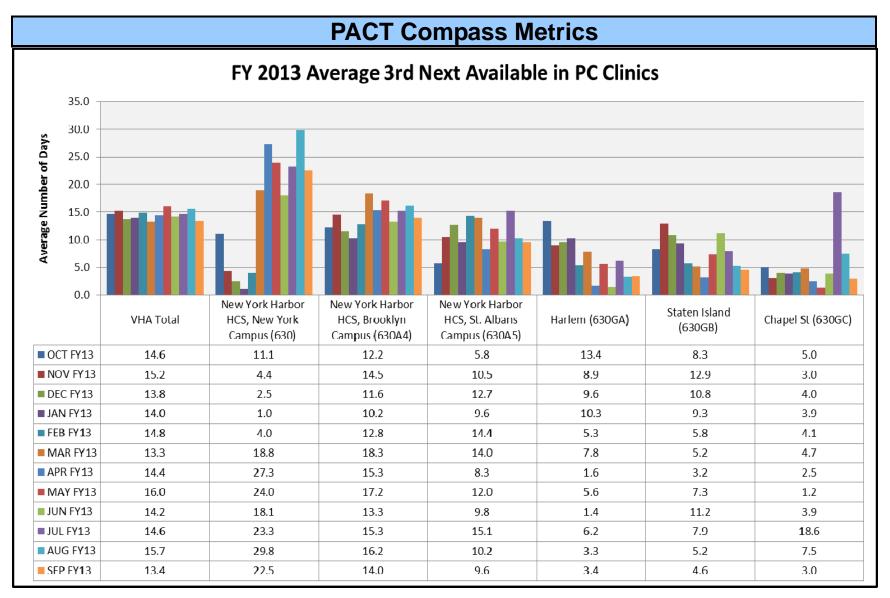
¹⁰ Source: MedSAS outpatient files; the denoted Specialty Care and Ancillary Services are limited to Primary Clinic Stops with a count ≥ 100 encounters during the October 1, 2012, through September 30, 2013, timeframe at the specified CBOC.

 ¹¹ Specialty Care Services refer to non-Primary Care and non-MH services provided by a physician.
 ¹² Ancillary Services refer to non-Primary Care and non-MH services that are not provided by a physician.

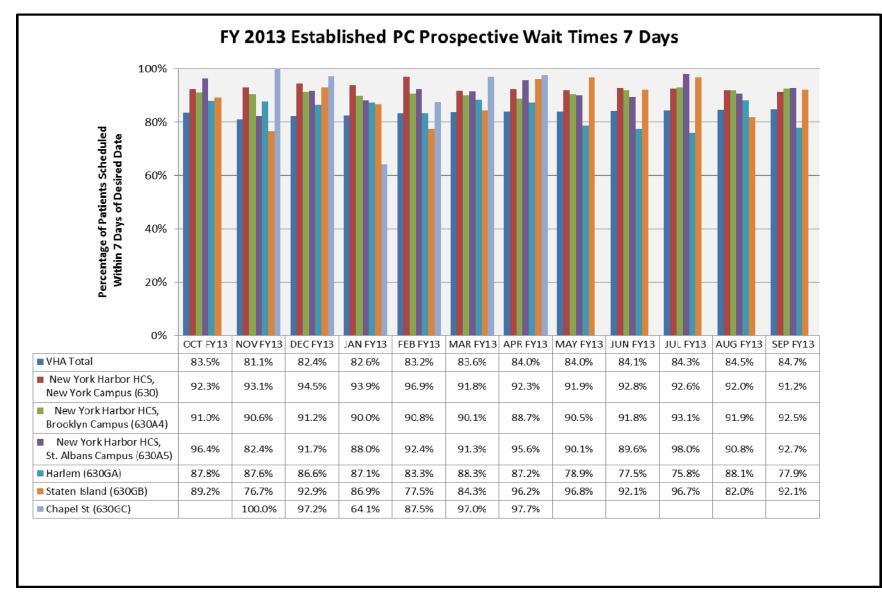
¹³ Tele-Health Services refer to services provided under the VA Telehealth program (http://www.telehealth.va.gov/)

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

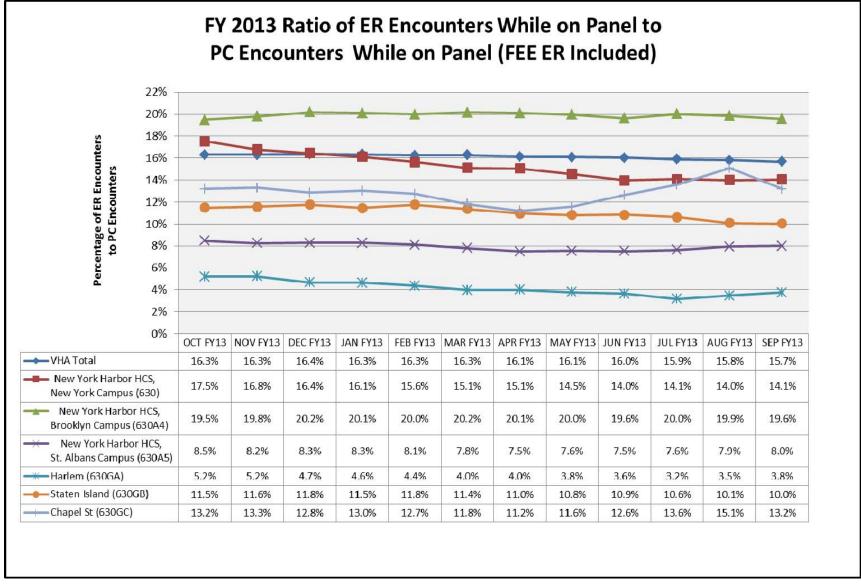
Appendix B



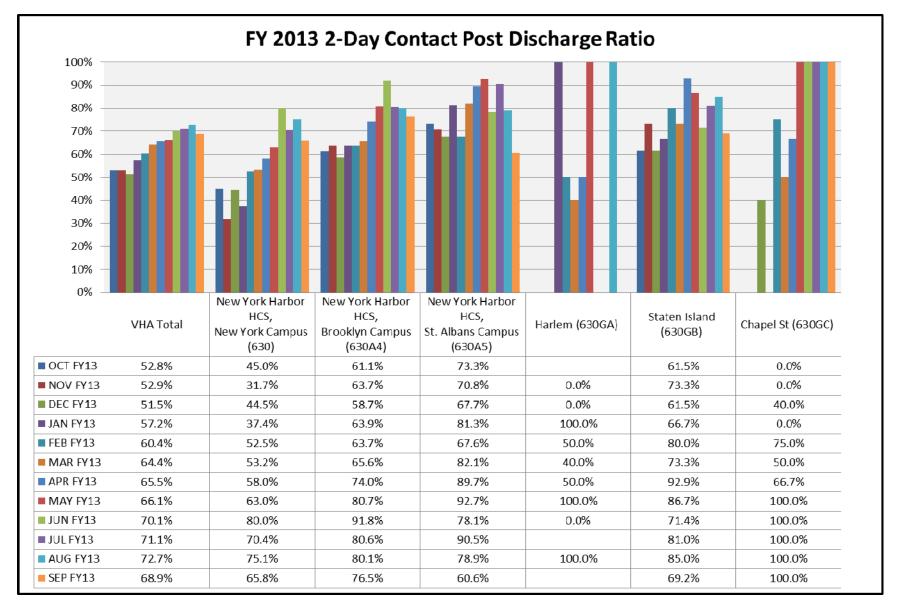
Data Definition.^e The average waiting time in days until the next third open appointment slot for completed primary care appointments in stop code 350. Completed appointments in stop code 350 for this metric include completed appointments where a 350 stop code is in the primary position on the appointment 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. Blank cells indicate the absence of reported data.



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. Blank cells indicate the absence of reported data.

VISN Director Comments

	artment of rans Affairs	Ме	emorandum
Date:	July 3, 2014		
From:	Director, NY/NJ Veterans	s Healthcare Netw	vork (10N03)
Subject:	CBOC and PCC Revie Healthcare System, Ne		New York Harbor
To:	Director, Baltimore Office	e of Healthcare In	spections (54BA)
	Director, Management OIG CAP CBOC)	Review Service	(VHA 10AR MRS

- 1. The responses to the Harlem Clinic CBOC review conducted the week of June 9, 2014 are being submitted for your review and consideration.
- 2. Should you have any questions, please do not hesitate to contact Pam Wright, RN, MSN, VISN QMO at 718-741-4135.

Mill A Salos

Michael A. Sabo, FACHE

Appendix D

Facility Director Comments

	artment of erans Affairs	Memorandum	
Date:	July 3, 2014		
From: Director, VA New York Harbor Healthcare System (630			
Subject:	CBOC and PCC Rev Healthcare System, N	views of the VA New York Harbor lew York, NY	
То:	Director, VA NY/NJ Ve	terans Healthcare Network (10N03)	
opportu		e System (VANYHHS) appreciates the port of recommendations from the OIG larlem Street CBOC.	
	with the recommendatio	ecommendation provided in the report. ns and corrective actions are in	
•	ave any questions, pleas ement Manager at 718-63	e contact Kim Arslanian, Performance 0-2865.	
Martina	A. Parauda		
Martina A.	Parauda, FACHE		

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 managers ensure that personally identifiable information is protected by securing laboratory specimens during transport from the Harlem CBOC to the parent facility.

Concur

Target date for completion: 7/31/14

Facility response: The Harlem CBOC has a designated container for the transport of laboratory specimens that protects personally identifiable information and a standard operating procedure used by the Harlem staff. A refresher training on the standard operating procedure will be completed by the end of July.

Recommendation 2. We recommended that the information technology server closet at the Harlem CBOC is maintained according to information technology safety and security standards.

Concur

Target date for completion: 6/10/14

Facility response: During the site review of the Harlem clinic on 6/9/14, the IT server closet sign in sheet was noted to be missing. The sheet was replaced on 6/10/14.

Recommendation 3. We recommended that CBOC/PCC 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: 10/31/14

Facility response: Of the RN Care Managers that were cited as not receiving MI training within 12 months of hire, half of them have now been trained. Another MI training is scheduled for the fall, and will again indicate to the remaining three PACT RN Care Mangers who have yet to attend, that they are expected at this mandatory session. Similarly, several of the RN Care Managers cited for not attending the TEACH trainings, were able to go to a later one (that fell after their 12 month hire date). Of those that still require to go to this event, we are also holding another TEACH training in the fall and we will again indicate to them that we expect them to participate.

We will continue our efforts to ensure that all of our staff is appropriately trained both in Motivational Interviewing and in Health Coaching by offering trainings at least every 6 months to all employees, with a particular emphasis on new hires who are less familiar with the tenets of PACT and patient-centered care.

Recommendation 4. 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: 10/31/14

Facility response: Medical record cases cited during the OIG visit represented prescriptions written during the time period of July 2012-June 2013. In March 2014, the Pharmacy & Therapeutics Committee implemented a drug ordering template for fluoroquinolone to ensure the appropriate clinical oversight and education to outpatients prescribed oral fluoroquinolone antibiotics. Use of the template will be monitored through ongoing medical record reviews.

Recommendation 5. We recommended that staff consistently provide written medication information that includes the fluoroquinolone.

Concur

Target date for completion: 10/31/14

Facility response: Medical record cases cited during the OIG visit represented prescriptions written during the time period of July 2012-June 2013. In March 2014, the Pharmacy & Therapeutics Committee implemented a drug ordering template for fluoroquinolone to ensure written medication information that includes the fluoroquinolone is provided to outpatients. Use of the template will be monitored through ongoing medical record reviews.

Recommendation 6. We recommended that staff provide medication counseling/education as required.

Concur

Target date for completion: 10/31/14

Facility response: Medical record cases cited during the OIG visit represented prescriptions written during the time period of July 2012-June 2013. In March 2014, the Pharmacy & Therapeutics Committee implemented a drug ordering template for fluoroquinolone to ensure medication counseling/education is completed for outpatients prescribed fluoroquinolones. Use of the template will be monitored through ongoing medical record reviews.

Recommendation 7. We recommended that the chief of staff consistently ensure that all Designated Women's Health Providers are designated with the women's health indicator in the Primary Care Management Module.

Concur

Target date for completion: 6/24/14

Facility response: All current designated Women's Health Providers have been designated with the women's health indicator (*WH*) in the Primary Care Management module.

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

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U.S. Senate: Kirsten E. Gillibrand, Charles E. Schumer
U.S. House of Representatives: Yvette Clarke, Joseph Crowley, Michael Grimm, Carolyn Maloney, Carolyn McCarthy, Gregory Meeks, Jerrold Nadler, Charles B. Rangel, Nydia Velzquez

This report is available at www.va.gov/oig.

Endnotes

^a 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.

^b 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 <u>http://www.prevention.va.gov/Publications/Newsletters/2013/HealthPOWER Prevention_News_Winter_2012_2</u> 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.

^c 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. ^d 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.
- ^e Reference used for PACT Compass data graphs:
- Department of Veterans' Affairs, Patient Aligned Care Teams Compass Data Definitions, August 29, 2013.