

Department of Veterans Affairs Office of Inspector General

**Office of Healthcare Inspections** 

Report No. 15-00113-161

# Review of Community Based Outpatient Clinics and Other Outpatient Clinics of West Palm Beach VA Medical Center West Palm Beach, Florida

March 31, 2015

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   |  |
| EOC      | environment of care                 |  |
| FY       | fiscal year                         |  |
| HIV      | human immunodeficiency virus        |  |
| NM       | not met                             |  |
| OIG      | Office of Inspector General         |  |
| 000      | other outpatient clinic             |  |
| PACT     | Patient Aligned Care Teams          |  |
| VHA      | Veterans Health Administration      |  |
| VISN     | Veterans Integrated Service Network |  |

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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 Clinics (CBOCs) and other outpatient clinics under the oversight of the West Palm Beach VA Medical Center and Veterans Integrated Service Network 8 provide safe, consistent, and high-quality health care. The review evaluated the clinics' compliance with selected requirements for alcohol use disorder, human immunodeficiency virus screening, and outpatient documentation. We also randomly selected the Delray Beach, FL, CBOC as a representative site and evaluated the environment of care on January 27, 2015.

**Review Results:** We conducted four focused reviews and had no findings for the Outpatient Documentation review. However, we made recommendations for improvement in the following three review areas:

## Environment of Care: Ensure that:

- Medications are secured and only accessible by those individuals who either dispense or administer medications at the Delray Beach, FL, CBOC.
- Patient-identifiable information is protected on laboratory specimens during transport from the Delray Beach, FL, CBOC to the parent facility.
- The door to the examination room designated for women veterans is equipped with electronic or manual locks at the Delray Beach, FL, CBOC.

## Alcohol Use Disorder. Ensure that:

• Registered Nurse Care Managers, providers, and clinical associates in the outpatient clinics receive health coaching training within 12 months of appointment to Patient Aligned Care Teams.

## Human Immunodeficiency Virus Screening: Ensure that:

- Clinicians provide human immunodeficiency virus testing as part of routine medical care for patients and that compliance is monitored.
- Clinicians consistently document informed consent for human immunodeficiency virus testing and that compliance is monitored.

## Comments

The VISN and Facility Directors agreed with the CBOC and OOC review findings and recommendations and provided acceptable improvement plans. (See Appendixes C and D, pages 15–18, for the full text of the Directors' comments.) We will follow up on the planned actions until they are completed.

Alud, Daight. M.

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

# **Objectives, Scope, and Methodology**

## Objectives

The CBOC and OOC 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 OOC reviews are recurring evaluations of selected outpatient care activities that focus on patient care quality and the EOC. In general, our objectives are to determine whether:

- The selected CBOC is compliant with EOC requirements.
- The CBOCs/OOCs are compliant with selected VHA requirements for AUD care.
- The CBOCs/OOCs are compliant with selected VHA requirements for HIV Screening.
- Healthcare practitioners at the CBOCs/OOCs comply with the requirements for outpatient documentation.

## 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
- HIV Screening
- Outpatient Documentation

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

## Methodology

The onsite EOC inspection was conducted at one randomly selected outpatient site of care that had not been previously inspected.<sup>1</sup> Details of the targeted

<sup>&</sup>lt;sup>1</sup> Each outpatient site selected for physical inspection was randomized from all primary care CBOCs, multi-specialty CBOCs, and heath care centers reporting to the parent facility and was operational and classified as such in VA's Site Tracking Database by October 1, 2014.

study populations for the AUD, HIV Screening, and Outpatient Documentation focused reviews are noted in Table 1.

| Review Topic                | Study Population   |  |
|-----------------------------|--|--|
| AUD                         | All CBOC and OOC patients screened within the study period<br>of July 1, 2013, through June 30, 2014, and who had a positive<br>AUDIT-C score; <sup>2</sup> and all licensed independent providers,<br>Registered Nurse Care Managers, and clinical associates |  |
|                             | assigned to PACT prior to October 1, 2013.   |  |
| HIV Screening               | All outpatients who had a visit in FY 2012 and had at least one visit at the parent facility's CBOCs and/or OOCs within a 12-month period during April 1, 2013, through March 31, 2014.  |  |
| Outpatient<br>Documentation | All patients new to VHA who had at least three outpatien<br>encounters (face-to-face visits, telephonic/telehealth care, and<br>telephonic communications) during April 1, 2013, through<br>March 31, 2014.  |  |

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 performed in accordance with OIG standard operating procedures for CBOC and OOC reviews.

 $<sup>^{2}</sup>$  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.<sup>a</sup>

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

#### Table 2. EOC

| NM | Areas Reviewed                                | Findings | Recommendations |
|----|---|----------|-----------------|
|    | The furnishings are clean and in good         |          |                 |
|    | repair.                                       |          |                 |
|    | The CBOC is clean (walls, floors, and         |          |                 |
|    | equipment are clean).                         |          |                 |
|    | The CBOC's inventory of hazardous             |          |                 |
|    | materials was reviewed for accuracy twice     |          |                 |
|    | within the prior 12 months.                   |          |                 |
|    | The CBOC's safety data sheets for             |          |                 |
|    | chemicals are readily available to staff.     |          |                 |
|    | If safety data sheets are in electronic form, |          |                 |
|    | the staff can demonstrate ability to access   |          |                 |
|    | the electronic version without coaching.      |          |                 |
|    | Employees received training on the new        |          |                 |
|    | chemical label elements and safety data       |          |                 |
|    | sheet format.                                 |          |                 |
|    | Clinic managers ensure that safety            |          |                 |
|    | inspections of CBOC medical equipment         |          |                 |
|    | are performed in accordance with Joint        |          |                 |
|    | Commission standards.                         |          |                 |
|    | Hand hygiene is monitored for compliance.     |          |                 |
|    | Personal protective equipment is readily      |          |                 |
|    | available.                                    |          |                 |
|    | Sterile commercial supplies are not           |          |                 |
|    | expired.                                      |          |                 |

| NM | Areas Reviewed (continued)  | Findings  | Recommendations  |
|----|---|---|--|
|    | The CBOC staff members minimize the risk of infection when storing and disposing of medical (infectious) waste.   |   |  |
|    | The CBOC has procedures to disinfect non-critical reusable medical equipment  |   |  |
|    | between patients.<br>There is evidence of fire drills occurring at<br>least every 12 months.  |   |  |
|    | Means of egress from the building are unobstructed.   |   |  |
|    | Access to fire extinguishers is<br>unobstructed.  |   |  |
|    | Fire extinguishers are located in large<br>rooms or are obscured from view, and the<br>CBOC has signs identifying the locations<br>of the fire extinguishers. |   |  |
|    | Exit signs are visible from any direction.<br>Multi-dose medication vials are not<br>expired.   |   |  |
| X  | All medications are secured from unauthorized access.   | All medications were not secured from<br>unauthorized access at the Delray Beach,<br>FL, CBOC.  | 1. We recommended that medications are<br>reviewed for need, secured, and only<br>accessible by those individuals who either<br>dispense or administer medications at the<br>Delray Beach, FL, CBOC and that<br>compliance is monitored. |
| X  | The staff protects patient-identifiable<br>information on laboratory specimens<br>during transport.   | At the Delray Beach, FL, CBOC, patient-<br>identifiable information on laboratory<br>specimens was not protected during<br>transport. | 2. We recommended that patient-<br>identifiable information on laboratory<br>specimens is protected during transport<br>from the Delray Beach, FL, CBOC to the<br>parent facility.   |
|    | Documents containing patient-identifiable information are not visible or unsecured.   |   |  |
|    | Adequate privacy is provided at all times.  |   |  |

| NM | Areas Reviewed (continued)   | Findings   | Recommendations  |
|----|--|--|--|
| X  | The women veterans' exam room is<br>equipped with either an electronic or<br>manual door lock.   | The women veterans' exam room at the<br>Delray Beach, FL, CBOC was not<br>equipped with either an electronic or<br>manual door lock. | 3. We recommended that the door to the examination room designated for women veterans is equipped with electronic or manual locks at the Delray Beach, FL, CBOC. |
|    | The information technology network<br>room/server closet is locked.<br>Access to the information technology  |  |  |
|    | network room/server closet is restricted to<br>personnel authorized by Office of<br>Information and Technology.  |  |  |
|    | Access to the information technology network room/server closet is documented.   |  |  |
|    | All computer screens are locked when not in use.   |  |  |
|    | Information is not viewable on monitors in public areas.   |  |  |
|    | The CBOC has an automated external defibrillator.  |  |  |
|    | There is an alarm system and/or panic<br>buttons installed and tested in high-risk<br>areas (for example, mental health clinic),<br>and the testing is documented. |  |  |
|    | CBOC staff receive regular<br>information/updates on their<br>responsibilities in emergency response<br>operations.  |  |  |
|    | The staff participates in scheduled emergency management training and exercises.   |  |  |

## AUD

The purpose of this review was to determine whether the facility's CBOCs and OOCs complied with selected alcohol use screening and treatment requirements.<sup>b</sup>

We reviewed relevant documents and 40 electronic health records. We also 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 | Recommendations |
|----|--|----------|-----------------|
|    | 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, clinic staff monitored  |          |                 |
|    | them and their alcohol use.  |          |                 |
|    | Counseling, education, and brief   |          |                 |
|    | treatments for AUD are provided within   |          |                 |
|    | 2 weeks of positive screening.   |          |                 |
|    | Clinic Registered Nurse Care Managers  |          |                 |
|    | have received motivational interviewing<br>training within 12 months of appointment to |          |                 |
|    | PACT.  |          |                 |
|    | FACT.  |          |                 |
|    |  |          |                 |
|    |  |          |                 |
|    |  |          |                 |
|    |  |          |                 |
|    |  |          |                 |

| NM | Areas Reviewed (continued)   | Findings   | Recommendations  |
|----|--|--|--|
| X  | Clinic Registered Nurse Care Managers<br>have received VHA National Center for<br>Health Promotion and Disease Prevention-<br>approved health coaching training (most<br>likely TEACH for Success) within 12<br>months of appointment to PACT.         | We found that 4 of 25 Registered Nurse<br>Care Managers did not receive health<br>coaching training within 12 months of<br>appointment to PACT.    | 4. We recommended that Registered<br>Nurse Care Managers, providers, and<br>clinical associates in the outpatient clinics<br>receive health coaching training within<br>12 months of appointment to Patient<br>Aligned Care Teams. |
| X  | Providers in the outpatient clinics have<br>received VHA National Center for Health<br>Promotion and Disease Prevention-<br>approved health coaching training (most<br>likely TEACH for Success) within<br>12 months of appointment to PACT.           | We found that 12 of 35 providers<br>(37 percent) did not receive health<br>coaching training within 12 months of<br>appointment to PACT.           |  |
| X  | Clinical associates in the outpatient clinics<br>have received VHA National Center for<br>Health Promotion and Disease Prevention-<br>approved health coaching training (most<br>likely TEACH for Success) within<br>12 months of appointment to PACT. | We found that 17 of 39 clinical associates<br>(43 percent) did not receive health<br>coaching training within 12 months of<br>appointment to PACT. |  |
|    | The facility complied with any additional elements required by VHA or local policy.  |  |  |

## **HIV Screening**

The purpose of this review was to determine whether CBOCs/OOCs are compliant with selected VHA requirements for HIV Screening.<sup>c</sup>

We reviewed the facility's self-assessment, VHA and local policies, and guidelines to assess administrative controls over the HIV screening process. We also reviewed 38 electronic health records 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. HIV Screening

| NM | Areas Reviewed                                  | Findings                                     | Recommendations                             |
|----|---|--|---|
|    | The facility has a HIV Lead Clinician to        |  |   |
|    | carry out responsibilities as required.         |  |   |
|    | The facility has policies and procedures to     |  |   |
|    | facilitate HIV testing.                         |  |   |
|    | The facility had developed policies and         |  |   |
|    | procedures that include requirements for        |  |   |
|    | the communication of HIV test results.          |  |   |
|    | Written patient educational materials           |  |   |
|    | utilized prior to or at the time of consent for |  |   |
|    | HIV testing include all required elements.      |  |   |
| Х  | Clinicians provided HIV testing as part of      | Clinicians did not provide HIV testing to    | 5. We recommended that clinicians           |
|    | routine medical care for patients.              | 32 of 38 patients (84 percent).              | provide human immunodeficiency virus        |
|    |   |  | testing as part of routine medical care for |
|    |   |  | patients and that compliance is monitored.  |
| Х  | When HIV testing occurred, clinicians           | Clinicians did not document informed         | 6. We recommended that clinicians           |
|    | consistently documented informed                | consent for any of the three patients tested | consistently document informed consent      |
|    | consent.  | for HIV.                                     | for human immunodeficiency virus testing    |
|    |   |  | and that compliance is monitored.           |
|    | The facility complied with additional           |  |   |
|    | elements as required by local policy.           |  |   |

## **Outpatient Documentation**

The purpose of this review was to determine whether healthcare practitioners at the CBOCs/OOCs comply with selected requirements for outpatient documentation.<sup>d</sup>

We reviewed relevant documents and 45 electronic health records. We also 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 5. Outpatient Documentation**

| NM | Areas Reviewed   | Findings | Recommendations |
|----|--|----------|-----------------|
|    | A relevant history of the illness or injury<br>and physical findings are documented<br>when the patient is first admitted for VA<br>medical care on an outpatient level. |          |                 |
|    | Randomly selected progress notes contain<br>the required documentation components in<br>the electronic health records.   |          |                 |

Appendix A

# **Clinic Profiles**

The CBOC/OOC review evaluates the quality of care provided to veterans at all of the outpatient clinics under the parent facility's oversight.<sup>3</sup> In addition to primary care integrated with women's health, mental health, and tele-health services, the CBOCs provide various specialty care and ancillary services. The following table provides information relative to each of the outpatient clinics and lists the additional specialty care and ancillary services provided at each location.

|                  |           |                       | Outpatient Workload /<br>Encounters <sup>4</sup> |       |                                   | Services Provided <sup>5</sup> |   |  |  |
|------------------|-----------|-----------------------|--|-------|-----------------------------------|--------------------------------|---|--|--|
| Location         | Station # | Rurality <sup>6</sup> | PC   | МН    | Specialty<br>Clinics <sup>7</sup> | Specialty Care <sup>8</sup>    | Ancillary Services <sup>9</sup>                   |  |  |
| Fort Pierce, FL  | 548GA     | Urban                 | 7,675  | 4,231 | 235                               | Dermatology                    | Audiology<br>Diabetic Retinal<br>Screening<br>EKG | Imaging Services<br>MOVE! Program <sup>10</sup><br>Nutrition<br>Pharmacy |  |
| Delray Beach, FL | 548GB     | Urban                 | 10,491   | 5,169 | 200                               | Dermatology                    | Audiology<br>Diabetic Retinal<br>Screening<br>EKG | Imaging Services<br>MOVE! Program<br>Nutrition<br>Pharmacy               |  |
| Stuart, FL       | 548GC     | Urban                 | 12,288   | 3,386 | 515                               | Cardiology<br>Dermatology      | Audiology<br>Diabetic Retinal<br>Screening        | EKG<br>Nutrition<br>Pharmacy   |  |
| Boca Raton, FL   | 548GD     | Urban                 | 7,037  | 1,747 | 206                               | Dermatology                    | Audiology<br>EKG                                  | Nutrition<br>Pharmacy  |  |

<sup>&</sup>lt;sup>3</sup> Includes all CBOCs in operation before April 1, 2014.

<sup>&</sup>lt;sup>4</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. Encounters occur in both the outpatient and inpatient setting.

<sup>&</sup>lt;sup>5</sup> The denoted Specialty Care and Ancillary Services are limited to Primary Clinic Stops with a count  $\geq$  100 encounters during the October 1, 2013, through September 30, 2014, timeframe at the specified CBOC.

<sup>&</sup>lt;sup>6</sup> <u>http://vssc.med.va.gov/</u>

<sup>&</sup>lt;sup>7</sup> The total number of encounters for the services provided in the "Specialty Care" column.

<sup>&</sup>lt;sup>8</sup> Specialty Care Services refer to non-Primary Care and non-Mental Health services provided by a physician.

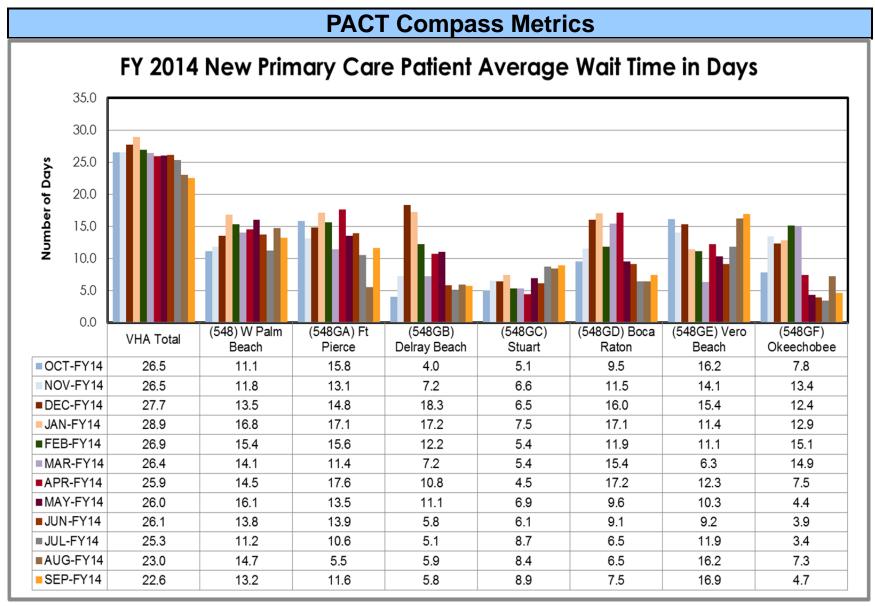
<sup>&</sup>lt;sup>9</sup> Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.

<sup>&</sup>lt;sup>10</sup> VHA Handbook 1120.01, *MOVE! Weight Management Program for Veterans*, March 31, 2011.

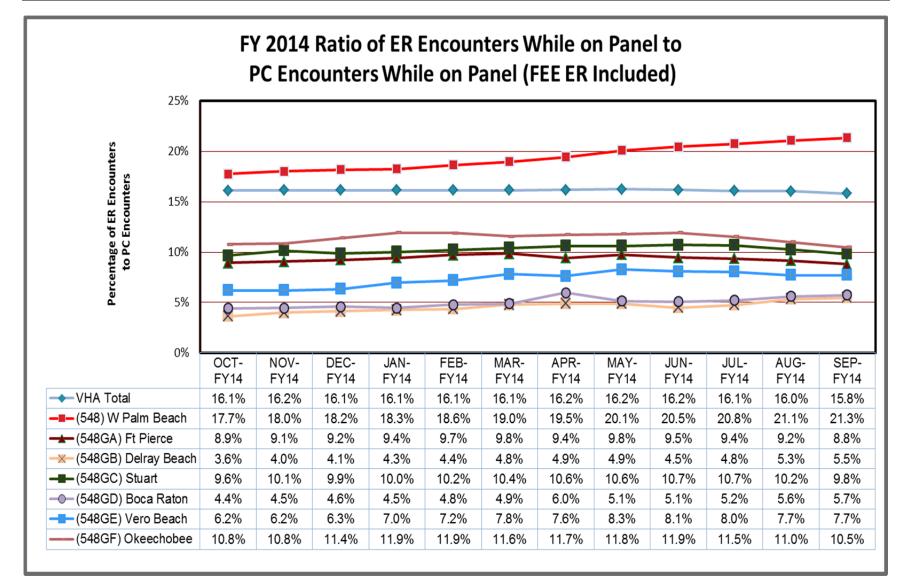
|                         |           |          | Outpatient Workload /<br>Encounters (cont.) |       |                      | Services Provided (cont.) |                                      |                       |  |
|-------------------------|-----------|----------|---|-------|----------------------|---------------------------|--------------------------------------|-----------------------|--|
| Location<br>(continued) | Station # | Rurality | РС  | МН    | Specialty<br>Clinics | Specialty Care            | Ancillary Services                   |                       |  |
| Vero Beach, FL          | 548GE     | Urban    | 7,989                                       | 4,360 | 187                  | Dermatology               | Diabetic Retinal<br>Screening<br>EKG | Nutrition<br>Pharmacy |  |
| Okeechobee, FL          | 548GF     | Rural    | 5,330                                       | 1,833 | 194                  | Dermatology               | EKG<br>Nutrition                     | Pharmacy              |  |

EKG=Electrocardiography

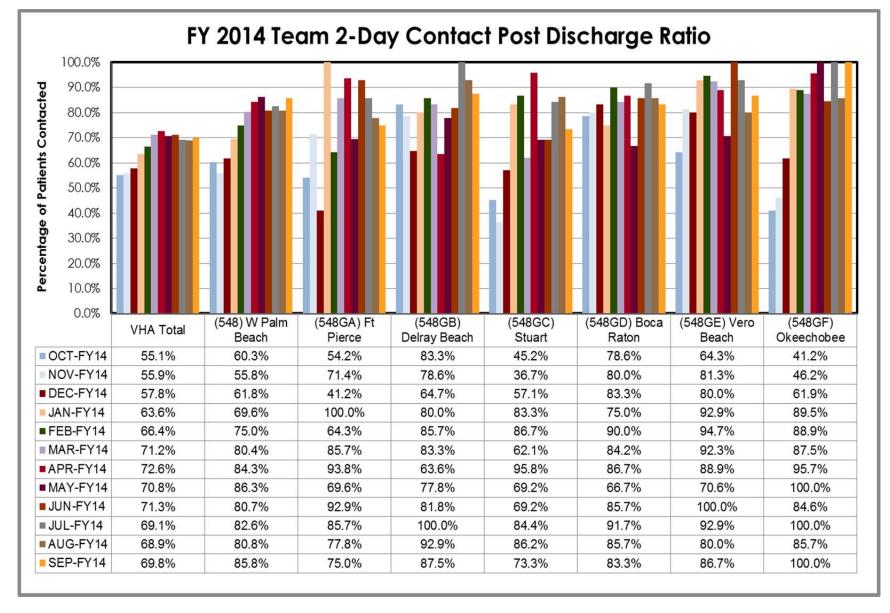
Appendix B



**Data Definition.**<sup>e</sup> The average number of calendar days between a new patient's Primary Care appointment (clinic stops 322, 323, and 350), excluding compensation and pension appointments, and the earliest creation date.



**Data Definition.**<sup>e</sup> This is a measure of where the patient receives his primary care and by whom. A low percentage is better. The formula is the total VHA ER/Urgent Care/FEE ER encounters while on panel (including FEE ER visits) divided by the number of Primary Care encounters while on panel with the patient's assigned primary care (or associate) provider plus the total VHA ER/Urgent Care/FEE ER encounters (including FEE ER visits) while on panel plus the number of Primary Care encounters while on panel plus the number of Primary Care encounters while on panel with a provider other than the patient's Primary Care Provider.



**Data Definition.**<sup>e</sup> The percent of discharges (VHA inpatient discharges) for the reporting timeframe for assigned Primary Care patients where the patient was contacted by a member of the Patient Aligned Care Team the patient is assigned to within 2 business days post discharge. Discharges resulting in death and discharges where a patient is readmitted within 2 days of discharge are excluded from this metric.

Appendix C

## **VISN Director Comments**

# Department of Veterans Affairs

# Memorandum

- Date: March 10, 2015
- From: Director, VA Sunshine Healthcare Network (10N8)

Subject: Review of CBOCs and OOCs of West Palm Beach VA Medical Center, West Palm Beach, FL

To: Director, Bay Pines Regional Office of Healthcare Inspections (54SP)

Director, Management Review Service (VHA 10AR MRS OIG CAP CBOC)

- 1. I have reviewed and concur with CBOC Review conducted at the West Palm Beach VA Medical Center the week of January 26, 2015.
- 2. Appropriate action has been initiated and/or completed as detailed in the attached response. Thank you!

(original signed by:)

Paul Bockelman, MBA, FACHE

Appendix D

## **Facility Director Comments**

## Department of Veterans Affairs

# Memorandum

Date: March 3, 2015

From: Director, West Palm Beach VA Medical Center (548/00)

Subject: Review of CBOCs and OOCs of West Palm Beach VA Medical Center, West Palm Beach, FL

To: Director, VA Sunshine Healthcare Network (10N8)

West Palm Beach VA Medical Center (WPB VA MC) would like to thank the Office of Inspector General (OIG) Team for the recommendations based on their assessment during the Community Based Outpatient Clinics (CBOCs) and Other Outpatient Clinics (OOCs) site visit conducted from January 26-30, 2015. We concur with the findings and are implementing the corrective actions identified for the improvement of processes.

Our goal is to deliver the best care to our Veterans every day. Focusing our attention to the highest level of care that produces Quality, Safety, and Value is of utmost importance to us. Therefore, we appreciate the OIG Team's consultative and collaborative approach in helping us to meet our goal.

Charleer R ago, 700046

Charleen R. Szabo, FACHE Medical Center Director

## 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 medications are reviewed for need, secured, and only accessible by those individuals who either dispense or administer medications at the Delray Beach, FL, CBOC and that compliance is monitored.

## Concur

#### Target date for completion: June 30, 2015

**Facility response:** Medication rooms have been repurposed, locks installed and only utilized by clinical staff. An Authorized Personnel Only Sign will be posted to advise the room is not for patient use. Rooms will be monitored monthly to ensure they are secured and not occupied by patients. The Clinic Manager/Designee will monitor through June 30, 2015, to ensure compliance. This will be reported monthly to the CBOC Committee through June 30, 2015.

**Recommendation 2.** We recommended that patient-identifiable information on laboratory specimens is protected during transport from the Delray Beach, FL, CBOC to the parent facility.

## Concur

## Target date for completion: March 31, 2015

**Facility response:** Lab & Pathology are working with the Medical Center locksmith to install locks on all coolers used for specimen transport. The implementing of installation of locks on the specimen coolers will be completed by March 31, 2015. Documentation of completion will be reported to the CBOC Committee.

**Recommendation 3.** We recommended that the door to the examination room designated for women veterans is equipped with electronic or manual locks at the Delray Beach, FL, CBOC.

## Concur

#### Target date for completion: January 30, 2015

**Facility response:** A manual door lock has been installed on the exam room. A review of all additional women's exam rooms has been completed to ensure additional locks are in place.

**Recommendation 4.** We recommended that Registered Nurse Care Managers, providers, and clinical associates in the outpatient clinics receive health coaching training within 12 months of appointment to Patient Aligned Care Teams.

## Concur

## Target date for completion: July 29, 2015

**Facility response:** All PACT providers, RNs, and clinical associates who are not currently in compliance will receive health coaching training by July 2015. Once training is completed, all employees will be recorded in TMS as completion of TEACH for Success and Motivational Interviewing. In addition, PACT (Providers, RNs, and LPNs) and Home Based Primary Care staff will keep a training monitor and update it as new employees join PACT. This monitor has been put in place to ensure coaching training has been accomplished within 12 months of appointment to PACT. A record of current deficient employees has been put in place and will be monitored on an ongoing basis to ensure compliance. After the target date of completion, CBOC, Primary Care, and Home Based Primary Care will report to the Performance Improvement Board on compliance.

**Recommendation 5.** We recommended that clinicians provide human immunodeficiency virus testing as part of routine medical care for patients and that compliance is monitored.

## Concur

#### Target date for completion: June 30, 2015

**Facility response:** Re-educated providers on requirement for HIV testing and completion of the HIV clinical reminder on February 10, 2015. Chart reviews will be conducted through June 30, 2015, to ensure compliance. Monitoring results of compliance will be reported monthly to the CBOC Committee through June 30, 2015.

**Recommendation 6.** We recommended that clinicians consistently document informed consent for human immunodeficiency virus testing and that compliance is monitored.

## Concur

#### Target date for completion: June 30, 3015

**Facility response:** Providers were re-educated on February 10, 2015, regarding the requirement to document informed consent. Prior to lab draw, staff will verify the order and validate that the consent is in CPRS prior to drawing test. Chart reviews will be conducted through June 30, 2015, to ensure compliance. Monitoring results of compliance will be reported monthly to the CBOC Committee through June 30, 2015.

## Office of Inspector General Contact and Staff Acknowledgments

| Contact               | For more information about this report, please contact the OIG at (202) 461-4720.  |  |  |  |  |
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## Endnotes

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- <sup>e</sup> Reference used for PACT Compass data graphs:
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