



**Department of Veterans Affairs
Office of Inspector General**

Office of Healthcare Inspections

Report No. 15-05148-75

**Review of Community Based
Outpatient Clinics and Other
Outpatient Clinics
of
Corporal Michael J. Crescenz
VA Medical Center
Philadelphia, Pennsylvania**

January 12, 2016

Washington, DC 20420

To Report Suspected Wrongdoing in VA Programs and Operations

Telephone: 1-800-488-8244

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(Hotline Information: www.va.gov/oig/hotline)

Glossary

| | |
|------|-----------------------------------|
| BBP | bloodborne pathogen |
| CBOC | community based outpatient clinic |
| EHR | electronic health record |
| EOC | environment of care |
| FY | fiscal year |
| HT | home telehealth |
| lab | laboratory |
| NM | not met |
| OIG | Office of Inspector General |
| OOC | other outpatient clinic |
| PC | primacy care |
| PTSD | post-traumatic stress disorder |
| VAMC | VA Medical Center |
| VHA | Veterans Health Administration |

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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 and other outpatient clinics under the oversight of the Corporal Michael J. Crescenz VA Medical Center and Veterans Integrated Service Network 4 provide safe, consistent, and high-quality health care. The review evaluated the clinics' compliance with selected requirements for home telehealth enrollment, outpatient lab results management, and post-traumatic stress disorder. We also randomly selected the Victor J. Saracini VA Outpatient Clinic, Horsham, PA, as a representative site and evaluated the environment of care on October 27, 2015.

Review Results: We conducted four focused reviews and had no findings for the Home Telehealth Enrollment and Post-Traumatic Stress Disorder Care reviews. However, we made recommendations for improvement in the following two review areas:

Environment of Care: Ensure that:

- Managers test the panic buttons regularly at the Victor J. Saracini VA Outpatient Clinic.
- Staff protect patient-identifiable information on laboratory specimens during transport from the Victor J. Saracini VA Outpatient Clinic to the parent facility.
- Managers provide feminine hygiene disposal bins in women's public restrooms at the Victor J. Saracini VA Outpatient Clinic.

Outpatient Lab Results Management: Ensure that:

- Clinicians consistently notify patients of their laboratory results within the timeframe set by local policy.

Comments

The Veterans Integrated Service Network and Facility Directors agreed with the Community Based Outpatient Clinic and other outpatient clinic review findings and recommendations and provided acceptable improvement plans. (See Appendixes C and D, pages 17–20, for the full text of the Directors' comments.) We will follow up on the planned actions until they are completed.



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 documentation requirements for the enrollment, assessment, and monitoring of HT patients.
- The CBOCs/OOCs are compliant with VHA requirements for the patient notification and follow up of selected outpatient lab results.
- The CBOCs/OOCs are compliant with selected VHA requirements related to PTSD screening, diagnostic evaluation, and treatment.

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
- HT Enrollment
- Outpatient Lab Results Management
- PTSD Care

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 a randomly selected outpatient site of care that had not been previously inspected.¹ Details of the targeted study populations for the HT Enrollment, Outpatient Lab Results Management, and PTSD Care focused reviews are noted in Table 1.

Table 1. CBOC/OOC Focused Reviews and Study Populations

| Review Topic | Study Population |
|-----------------------------------|--|
| HT Enrollment | All CBOC and OOC patients screened within the study period of July 1, 2014, through June 30, 2015, who have had at least one “683” Monthly Monitoring Note and did not have Monthly Monitoring Notes documented before July 1, 2014. |
| Outpatient Lab Results Management | All patients who had outpatient (excluding emergency department, urgent care, or same day surgery orders) potassium and sodium serum lab test results during January 1 through December 31, 2014. |
| PTSD Care | All patients who had a positive PTSD screen at the parent facility’s outpatient clinics during July 1, 2014, through June 30, 2015. |

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.

¹ Each outpatient site selected for physical inspection was randomized from all PC CBOCs, multi-specialty CBOCs, and health care centers reporting to the parent facility and was operational and classified as such in VA’s Site Tracking Database by August 15, 2015.

Results and Recommendations

EOC

The purpose of this review was to assess 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 Victor J. Saracini VA Outpatient Clinic. 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 |
|-------------------------------------|--|----------|-----------------|
| Document and Training Review | | | |
| | Managers monitored hand hygiene compliance. | | |
| | Managers had an Exposure Control Plan for BBP. | | |
| | Managers reviewed the Exposure Control Plan annually. | | |
| | Managers included an exposure determination for all job classifications in the Exposure Control Plan for BBPs. | | |
| | Managers included the Hepatitis B vaccine in the Exposure Control Plan for BBP. | | |
| | In the Exposure Control Plan for BBPs, managers provide the Hepatitis B vaccine to employees upon exposure to a BBP. | | |
| | In the Exposure Control Plan for BBPs, managers provide the Hepatitis B vaccine to employees within 10 days of job assignment. | | |
| | In the Exposure Control Plan for BBPs, managers document employees' declination statements for the Hepatitis B vaccine. | | |

| NM | Areas Reviewed (continued) | Findings | Recommendations |
|----|---|----------|-----------------|
| | In the Exposure Control Plan for BBPs, managers provide post exposure prophylaxis within 72 hours. | | |
| | Managers documented their consideration and implementation of safety needle devices. | | |
| | Managers documented their consideration and implementation of safety needle devices annually. | | |
| | Training for CBOC employees on the Exposure Control Plan for BBP has been provided within the past 12 months for those newly hired and annually for others. | | |
| | Managers have a policy/procedure for CBOC life safety elements. | | |
| | Managers have a policy for the management of clinical emergencies. | | |
| | CBOC managers have a policy for the management of mental health emergencies. | | |
| | Managers have a documented Hazard Vulnerability Assessment to identify potential CBOC emergencies. | | |
| | Managers reviewed the Hazard Vulnerability Assessment annually. | | |
| | Managers have a policy that requires CBOC staff to receive regular information on their responsibilities in emergency response operations. | | |
| | CBOC staff participate in regular emergency management training and exercises. | | |

| NM | Areas Reviewed (continued) | Findings | Recommendations |
|----------------------------|---|--|--|
| | Managers conducted fire drills at the CBOC at least once every 12 months for the past 24 months and documented critiques of the fire drills. | | |
| | Managers have a policy/procedure for the identification of individuals entering the CBOC. | | |
| | Managers had a Workplace Behavioral Risk Assessment in place. | | |
| X | Managers tested the alarm system or panic buttons in high-risk areas during the past 12 months. | Managers have not tested the panic buttons within the past 12 months at the Victor J. Saracini VA Outpatient Clinic. | 1. We recommended that managers test the panic buttons regularly at the Victor J. Saracini VA Outpatient Clinic. |
| | Managers had written procedures to follow in the event of a security incident. | | |
| | CBOC employees received training on the new chemical label elements and safety data sheet format. | | |
| | Managers have a policy/procedure for the cleaning and disinfection of telehealth equipment. | | |
| Physical Inspection | | | |
| | The CBOC is clean. | | |
| | The furnishings and equipment are safe and in good repair. | | |
| | Hand hygiene facilities and product dispensers are working and readily accessible to employees. | | |
| | Personal protective equipment is available. | | |
| | Sharps containers are closable, easily accessible, and not overfilled. | | |
| | Clinic staff do not store food and drinks in refrigerators or freezers or on countertops or other areas where there is blood or other potentially infectious materials. | | |

| NM | Areas Reviewed (continued) | Findings | Recommendations |
|----|--|----------|-----------------|
| | Managers ensured that sterile commercial supplies are not expired. | | |
| | Managers minimize the risk of infection when storing and disposing of medical (infectious) waste. | | |
| | Managers ensured unobstructed access to fire alarms/pull stations. | | |
| | Access to fire extinguishers is unobstructed. | | |
| | For fire extinguishers located in large rooms or are obscured from view, managers identified the locations of the fire extinguishers with signs. | | |
| | Exit signs are visible from any direction. | | |
| | Exit routes from the building are unobstructed. | | |
| | Staff wear VA-issued identification badges. | | |
| | Managers control access to and from areas identified as security sensitive. | | |
| | Managers installed an alarm system or panic buttons in high-risk areas. | | |
| | Managers reviewed the CBOC's inventory of hazardous materials for accuracy twice within the prior 12 months. | | |
| | Managers had the CBOC's safety data sheets for chemicals readily available for the staff. | | |
| | Managers provided visual and auditory privacy for veterans at check-in. | | |
| | Managers provided visual and auditory privacy for patients in the interview areas. | | |
| | Managers equipped examination room doors with either an electronic or manual lock. | | |

| NM | Areas Reviewed (continued) | Findings | Recommendations |
|----|--|---|--|
| | Managers ensured the availability and use of a privacy sign to indicate that a telehealth visit is in progress. | | |
| | Documents containing patient-identifiable information are not visible or unsecured. | | |
| | All computer screens are locked when not in use. | | |
| | Information is not viewable on monitors in public areas. | | |
| | Window coverings, if present, provide privacy. | | |
| X | Patient-identifiable information is protected on laboratory specimens during transport so that patient privacy is maintained. | Patient-identifiable information is not protected on laboratory specimens during transport from the Victor J. Saracini VA Outpatient Clinic to the parent facility. | 2. We recommended that staff protect patient-identifiable information on laboratory specimens during transport from the Victor J. Saracini VA Outpatient Clinic to the parent facility. |
| | The examination room(s) for women veterans are located in a space where they do not open into a public waiting room or a high-traffic public corridor. | | |
| | Adequate privacy for women veterans is provided in the examination rooms. | | |
| | Feminine hygiene products are available in examination rooms where pelvic examinations are performed or in bathrooms within close proximity. | | |
| X | Women's public restrooms have feminine hygiene products and disposal bins available for use. | Managers did not provide feminine hygiene disposal bins for use in women's public restrooms at the Victor J. Saracini VA Outpatient Clinic. | 3. We recommended that managers provide feminine hygiene disposal bins in women's public restrooms at the Victor J. Saracini VA Outpatient Clinic. |
| | Multi-dose medication vials are not expired. | | |
| | All medications are secured from unauthorized access. | | |
| | The information technology network room/server closet is secured/locked. | | |

| NM | Areas Reviewed (continued) | Findings | Recommendations |
|----|--|----------|-----------------|
| | Access to the information technology network room/server closet is restricted to personnel authorized by Office of Information and Technology, as evidenced by a list of authorized individuals. | | |
| | Access to the information technology network room/server closet is documented, as evidenced by the presence of a sign-in/sign-out log. | | |

HT Enrollment

The purpose of this review was to determine whether the facility’s CBOCs and OOCs are compliant with selected VHA documentation requirements for the enrollment, assessment, and monitoring of HT patients.^b

We reviewed relevant documents and 50 EHRs. 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 3. HT Enrollment

| NM | Areas Reviewed | Findings | Recommendations |
|----|--|----------|-----------------|
| | Clinicians entered a consult for HT services. | | |
| | Clinicians completed the HT enrollment requests or “consults.” | | |
| | Clinicians documented contact with the patient to evaluate suitability for HT services. | | |
| | Clinicians documented the patient or caregiver’s verbal informed consent for HT services. | | |
| | Clinicians documented assessments and treatment plans for HT patients. | | |
| | Providers signed HT assessments and treatment plans. | | |
| | Monthly monitoring notes were documented for each month of HT program participation. | | |
| | Documentation of HT enrollment (consult, screening, and/or initial assessment notes) was completed prior to the entry of monthly monitoring notes. | | |

Outpatient Lab Results Management

The purpose of this review was to determine whether CBOCs/OOCs are compliant with VHA requirements for the patient notification and follow up of selected outpatient lab results.^c

We reviewed relevant documents and 43 EHRs. We also validated findings with key managers and staff. The table below shows the areas reviewed for this topic. The area marked as NM did not meet applicable requirements and needed improvement.

Table 4. Outpatient Lab Results Management

| NM | Areas Reviewed | Findings | Recommendations |
|----|---|--|---|
| | The facility has a written policy regarding communication of lab results from diagnostic practitioner to ordering practitioner. | | |
| | The facility has a written policy for the communication of lab results that included all required elements. | | |
| X | Clinicians notified patients of their lab results. | Clinicians did not consistently notify 20 of 43 patients (40 percent) of their lab results within the timeframe set by local policy. | 4. We recommended that clinicians consistently notify patients of their laboratory results within the timeframe set by local policy. |
| | Clinicians documented in the EHR all attempts to communicate with the patients regarding their lab results. | | |
| | Clinicians provided interventions for clinically significant abnormal lab results. | | |

PTSD Care

The purpose of this review was to assess whether CBOCs/OOCs are compliant with selected VHA requirements for PTSD follow up in the outpatient setting.^d

We reviewed relevant documents and 40 EHRs. 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. PTSD Care

| NM | Areas Reviewed | Findings | Recommendations |
|----|---|----------|-----------------|
| | Each patient with a positive PTSD screen received a suicide risk assessment. | | |
| | Suicide risk assessments for patients with positive PTSD screens are completed by acceptable providers. | | |
| | Acceptable providers established plans of care and disposition for patients with positive PTSD screens. | | |
| | Acceptable providers offered further diagnostic evaluations to patients with positive PTSD screens. | | |
| | Providers completed diagnostic evaluations for patients with positive PTSD screens. | | |
| | Patients, when applicable, received mental health treatment. | | |

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.² In addition to PC 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.

| Location | Station # | Rurality ⁵ | Outpatient Classification ⁶ | Outpatient Workload / Encounters ³ | | | Services Provided ⁴ | | |
|--------------------------------|-----------|-----------------------|--|---|-------|--------------------------------|--------------------------------|--|--|
| | | | | PC | MH | Specialty Clinics ⁷ | Specialty Care ⁸ | Ancillary Services ⁹ | |
| Fort Dix, NJ | 642GA | Rural | Multi-Specialty | 8,526 | 6,888 | 1,181 | Cardiology Podiatry | MOVE! Program ¹⁰ Pharmacy | Sleep Medicine Social Work |
| Horsham, PA | 642GC | Urban | Multi-Specialty | 12,813 | 5,657 | 2,048 | Optometry | Audiology Diabetic Retinal Screening | Sleep Medicine MOVE! Program Pharmacy |
| Sewell, NJ | 642GD | Urban | Multi-Specialty | 11,296 | 7,072 | 2,564 | Dermatology Optometry | Anti-Coagulation Clinic Audiology Diabetic Retinal Screening MOVE! Program | Pharmacy Rehabilitation Services Sleep Medicine |
| Camden, NJ ¹¹ | 642GF | Urban | Primary Care | NA | NA | NA | NA | NA | NA |
| Philadelphia, PA ¹² | 642QA | Urban | Other Outpatient Services | NA | NA | NA | NA | NA | NA |
| Philadelphia, PA ¹² | 642QB | Urban | Other Outpatient Services | NA | NA | NA | NA | NA | NA |

² Includes all CBOCs in operation before August 15, 2015.

³ 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.

⁴ The denoted Specialty Care and Ancillary Services are limited to Primary Clinic Stops with a count ≥ 100 encounters during the October 1, 2014, through September 30, 2015, timeframe at the specified CBOC.

⁵ <http://vssc.med.va.gov/>

⁶ VHA Handbook 1006.02, *VHA Site Classifications and Definitions*, December 30, 2013.

⁷ The total number of encounters for the services provided in the "Specialty Care" column.

⁸ Specialty Care Services refer to non-Primary Care and non-Mental Health services provided by a physician.

⁹ Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.

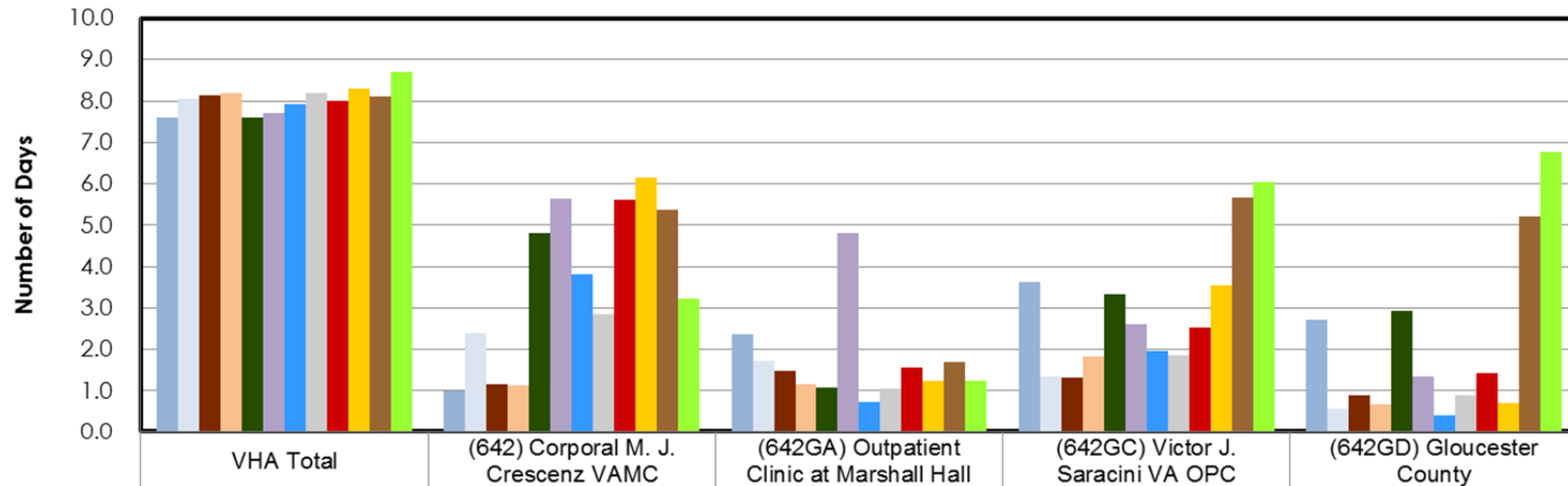
¹⁰ VHA Handbook 1120.01, *MOVE! Weight Management Program for Veterans*, March 31, 2011.

¹¹ FY 2015 workload for 642GF (Camden) is captured under the parent facility.

¹² 642QA (Philadelphia) is a freestanding dialysis clinic, and 642QB (Philadelphia) is an outreach center for homeless veterans.

Patient Aligned Care Team Compass Metrics

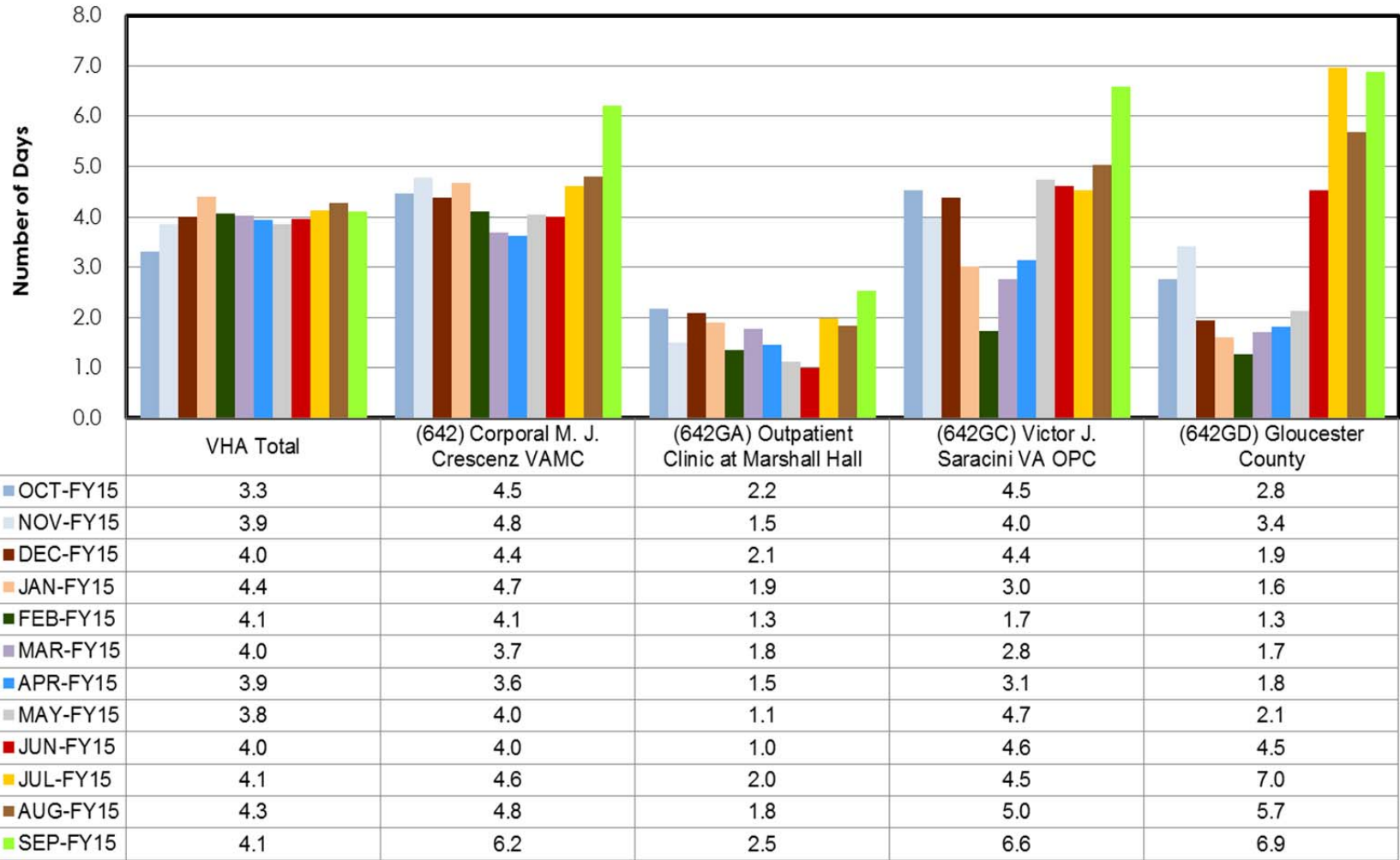
FY 2015 New PC Patient Average Wait Time in Days



| | VHA Total | (642) Corporal M. J. Crescenz VAMC | (642GA) Outpatient Clinic at Marshall Hall | (642GC) Victor J. Saracini VA OPC | (642GD) Gloucester County |
|------------|-----------|------------------------------------|--|-----------------------------------|---------------------------|
| ■ OCT-FY15 | 7.6 | 1.0 | 2.4 | 3.6 | 2.7 |
| ■ NOV-FY15 | 8.1 | 2.4 | 1.7 | 1.4 | 0.6 |
| ■ DEC-FY15 | 8.1 | 1.2 | 1.5 | 1.3 | 0.9 |
| ■ JAN-FY15 | 8.2 | 1.1 | 1.2 | 1.8 | 0.7 |
| ■ FEB-FY15 | 7.6 | 4.8 | 1.1 | 3.3 | 2.9 |
| ■ MAR-FY15 | 7.7 | 5.6 | 4.8 | 2.6 | 1.4 |
| ■ APR-FY15 | 7.9 | 3.8 | 0.7 | 2.0 | 0.4 |
| ■ MAY-FY15 | 8.2 | 2.8 | 1.0 | 1.8 | 0.9 |
| ■ JUN-FY15 | 8.0 | 5.6 | 1.6 | 2.5 | 1.4 |
| ■ JUL-FY15 | 8.3 | 6.1 | 1.2 | 3.6 | 0.7 |
| ■ AUG-FY15 | 8.1 | 5.4 | 1.7 | 5.7 | 5.2 |
| ■ SEP-FY15 | 8.7 | 3.2 | 1.3 | 6.1 | 6.8 |

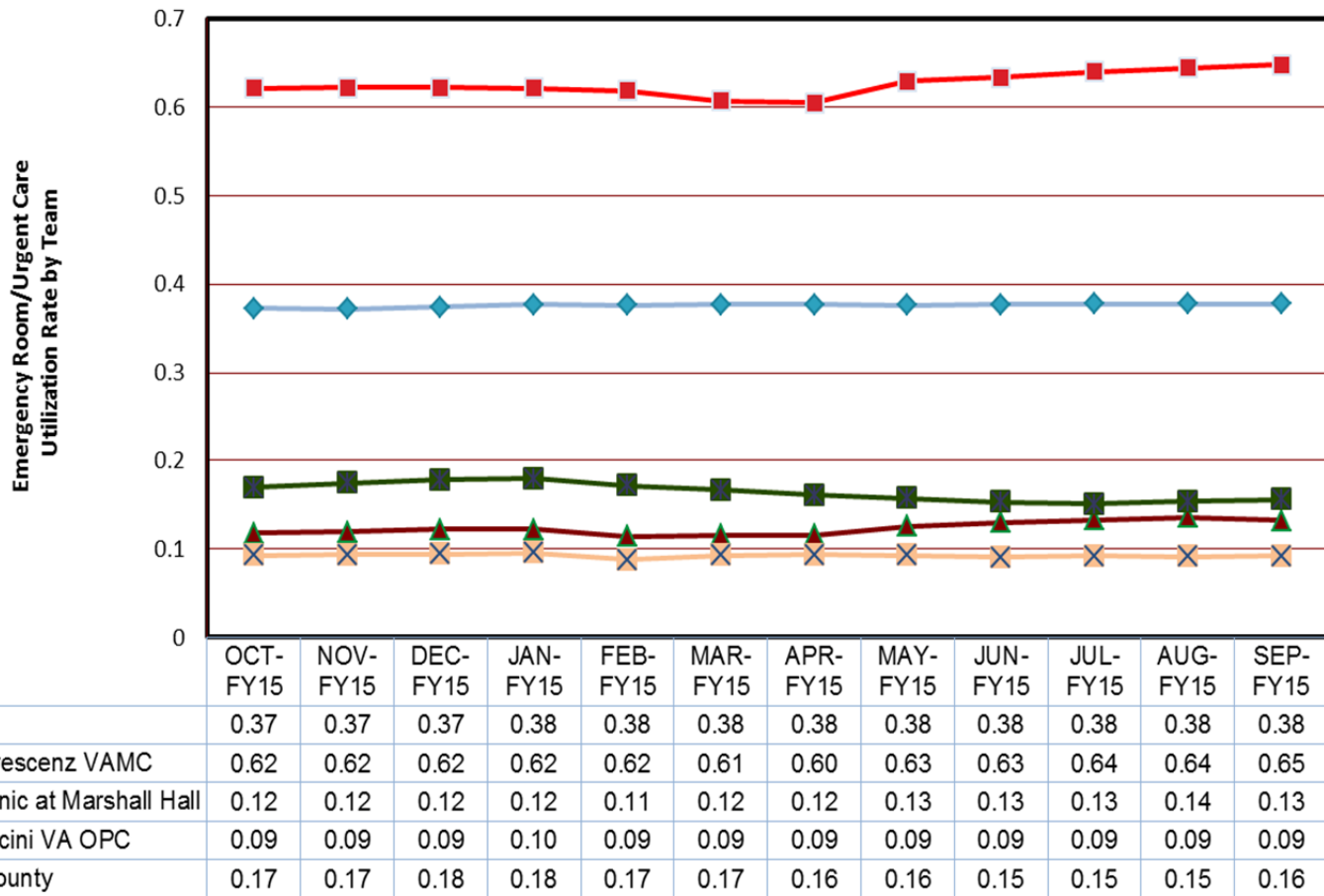
Data Definition.^e The average number of calendar days between a New Patient’s PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic Appointment, Completed Appointment) from the completed appointment date. *Note that prior to FY15, this metric was calculated using the earliest possible create date.*

FY 2015 Established PC Patient Average Wait Time in Days



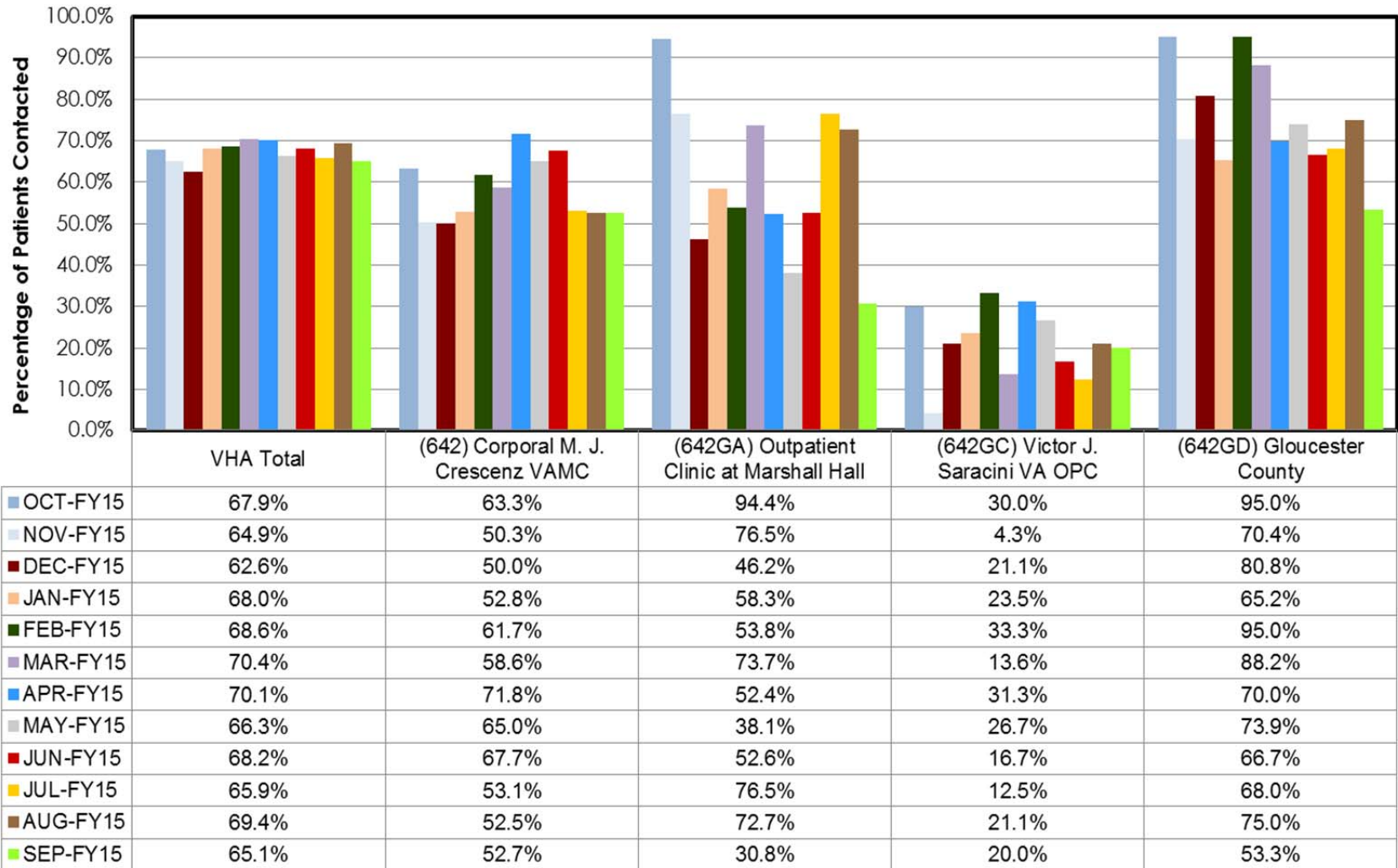
Data Definition.^e The average number of calendar days between an Established Patient’s PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic Appointment, Completed Appointment) from the completed appointment date.

FY 2015 Emergency Room/Urgent Care Utilization Rate for Assigned PC Patients



Data Definition.^e The total Emergency Room/Urgent Care encounters for assigned PC patients in the last 12 months divided by the Team Assignments. VHA Emergency Room/Urgent Care encounters are defined as encounters with a Primary Stop Code of 130 or 131 in either the primary or secondary position, excluding encounters with a Secondary Stop Code of 107, 115, 152, 311, 333, 334, 999, 474, 103, 430, 328, 321, 329, or 435 and the encounter was with a licensed independent practitioner (MD, DO, RNP, PA).

FY 2015 Team 2-Day Post Discharge Contact Ratio



Data Definition.^e The percent of assigned PC patients discharged from any VA facility who have been contacted by a PC team member within 2 business days during the reporting period. Patients are excluded if they are discharged from an observation specialty and/or readmitted within 2 business days to any VA facility. Team members must have been assigned to the patient’s team at the time of the patient’s discharge.

Interim Veterans Integrated Service Network Director Comments

**Department of
Veterans Affairs**

Memorandum

Date: December 10, 2015

From: Interim Director, VA Healthcare (10N4)

Subject: **Review of CBOCs and OOCs of Corporal Michael J. Crescenz
VAMC, Philadelphia, PA**

To: Director, Washington DC Office of Healthcare Inspections (54DC)

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

I have reviewed the information provided by the Philadelphia VA Medical Center and I am submitting to your office as requested. I concur with all responses.

If you have any questions or require additional information, please contact Moira Hughes, VISN 4 Quality Management Officer at 412-822-3294.

//original signed by Carla Sivek, Deputy Network Director, for://

William H. Mills

Attachment

Facility Director Comments

**Department of
Veterans Affairs**

Memorandum

Date: December 2, 2015

From: Director, Corporal Michael J. Crescenz VAMC (642/00)

**Subject: Review of CBOCs and OOCs of Corporal Michael J. Crescenz
VAMC, Philadelphia, PA**

To: Interim Director, VA Healthcare (10N4)

Thank you for the opportunity to review the draft report on the Community Based Outpatient Clinic Review at the Corporal Michael J. Crescenz VAMC, Philadelphia, PA.

I have reviewed the document and concur with the recommendations. Corrective action plans have been established with planned completion dates, as detailed in the attached report.

//original signed by://
DANIEL D. HENDEE, FACHE
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 managers test the panic buttons regularly at the Victor J. Saracini VA Outpatient Clinic.

Concur.

Target date for completion: March 1, 2016

Facility response: Testing of panic alarms at the Victor J. Saracini VA Outpatient Clinic was initiated on September 1, 2015. This is a joint responsibility between police service and CBOC staff. Testing is performed and recorded as in other CMCVAMC CBOCs. The alarms will be tested monthly. Results of testing completion will be communicated monthly during the organizational wide Environment of Care (EOC) Committee meeting until 100% compliance for three (3) consecutive months of testing, monitoring is achieved.

Recommendation 2. We recommended that staff protect patient-identifiable information on laboratory specimens during transport from the Victor J. Saracini VA Outpatient Clinic to the parent facility.

Concur.

Target date for completion: April 1, 2016

Facility response: Laboratory specimen transport containers will be fitted with a locking mechanism sufficient to prevent unauthorized access to patient identifiable information (PII). Couriers, laboratory staff and CBOC staff will be educated on the requirement for locked transport containers. After the achievement of 90% or greater for three (3) consecutive months, monitoring will be added to Environment of Care (EOC) rounds.

Recommendation 3. We recommended that managers provide feminine hygiene disposal bins in women's public restrooms at the Victor J. Saracini VA Outpatient Clinic.

Concur.

Target date for completion: March 1, 2016

Facility response: Feminine hygiene disposal bins will be installed in women's public restrooms at the Victor J. Saracini VA Outpatient Clinic by the above date.

Recommendation 4. We recommended that clinicians consistently notify patients of their laboratory results within the timeframe set by local policy.

Concur.

Target date for completion: May 1, 2016

Facility response: Processes will be consistently deployed to notify patients of normal laboratory results within fourteen (14) days as required by local MCM 113-02 and VHA Directive 1088. After the achievement of 90% or greater for three (3) consecutive months, monitoring will be added to Primary Care (PC) performance improvement activities.

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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Report Distribution

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U.S. Senate: Cory A. Booker; Robert P. Casey, Jr.; Robert Menendez; Patrick J. Toomey
U.S. House of Representatives: Brendan Boyle, Robert Brady, Ryan Costello, Chaka Fattah, Michael G. Fitzpatrick, Frank LoBiondo, Tom MacArthur, Pat Meehan, Donald Norcross, Chris Smith

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

Endnotes

^a References used for the EOC review included:

- International Association of Healthcare Central Services Materiel Management, *Central Service Technical Manual*, 7th ed.
- Joint Commission, *Joint Commission Comprehensive Accreditation and Certification Manual*, July 1, 2015.
- National Fire Protection Association (NFPA), *NFPA 10: Installation of Portable Fire Extinguishers*, 2013.
- National Fire Protection Association (NFPA), *NFPA 101: Life Safety Code*, 2015.
- US Department of Health and Human Services, *Health Information Privacy: The Health Insurance Portability and Accountability Act (HIPAA) Enforcement Rule*, February 16, 2006.
- US Department of Labor, Occupational Safety and Health Administration (OSHA), *Fact Sheet: Hazard Communication Standard Final Rule*, n.d.
- US Department of Labor, Occupational Safety and Health Administration (OSHA), *Regulations (Standards – 29 CFR), 1910 General Industry Standards, 120 Hazardous Waste Operations and Emergency Response*, February 8, 2013.
- US Department of Labor, Occupational Safety and Health Administration (OSHA), *Regulations (Standards – 29 CFR), 1910 General Industry Standards, 1030 Bloodborne Pathogens*, April 3, 2012.
- VA Directive 0059, *VA Chemicals Management and Pollution Prevention*, May 25, 2012.
- VA Handbook 6500, *Risk Management Framework for VA Information Systems – Tier 3: VA Information Security Program*, March 10, 2015.
- VHA Center for Engineering, Occupational Safety, and Health (CEOSH), *Emergency Management Program Guidebook*, March 2011.
- 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 1101.10, *Patient Aligned Care Team (PACT) Handbook*, February 5, 2014.
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