

Office of Healthcare Inspections

Report No. 16-00024-299

Review of Community Based Outpatient Clinics and Other Outpatient Clinics of James H. Quillen VA Medical Center Mountain Home, Tennessee

May 12, 2016

To Report Suspected Wrongdoing in VA Programs and Operations

Telephone: 1-800-488-8244 E-Mail: <u>vaoighotline@va.gov</u>

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

Glossary

CBOC community based outpatient clinic

EHR electronic health record

EOC environment of care FY fiscal year

HT home telehealth

lab laboratory

NA not applicable

NM not met

OIG Office of Inspector General

OOC other outpatient clinic

PC primary care

PTSD post-traumatic stress disorder
VHA Veterans Health Administration

Table of Contents

P	age
Executive Summary	į
Objectives, Scope, and Methodology	1
Objectives	1
Scope	1
Methodology	2
Results and Recommendations	
EOC	3
HT Enrollment	8
Outpatient Lab Results Management	9
PTSD Care	10
Appendixes	
A. Clinic Profiles	11
B. Patient Aligned Care Team Compass Metrics	
C. Veterans Integrated Service Network Director Comments	17
D. Acting Facility Director Comments	
E. Office of Inspector General Contact and Staff Acknowledgments	20
F. Report Distribution	
G Endnotes	22

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 James H. Quillen VA Medical Center and Veterans Integrated Service Network 9 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 care. We also randomly selected the Jonesville VA Clinic, Jonesville, VA, as a representative site and evaluated the environment of care on March 15, 2016.

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

<u>Home Telehealth Enrollment</u>: Ensure that:

Providers sign Home Telehealth assessments and treatment plans.

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 17–19, for the full text of the Directors' comments.) We will follow up on the planned actions for the open recommendations until they are completed.

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

John Vaidly. M.

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	All patients who had outpatient (excluding emergency					
Results	department, urgent care, or same day surgery orders)					
Management	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.

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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 Jonesville VA Clinic. The table below shows the areas reviewed for this topic. Any items that did not apply to this facility are marked NA. The facility generally met requirements. We made no recommendations.

Table 2. EOC

NM	Areas Reviewed	Findings	Recommendations					
Docu	Document and Training Review							
	Managers monitored clinic staff's hand							
	hygiene compliance.							
	Clinic managers provided training for							
	employees on the Exposure Control Plan							
	for Blood borne Pathogens within the past							
	12 months for those newly hired and							
	annually for others.							
	The clinic had a policy/procedure for life							
	safety elements.							
	The clinic had a policy for the management							
	of clinical emergencies.							
	The clinic had a policy for the management							
	of mental health emergencies.							
	The clinic had a documented Hazard							
	Vulnerability Assessment to identify							
	potential emergencies.							
	The Hazard Vulnerability Assessment was							
	reviewed annually.							
	The clinic had a policy that requires staff to							
	receive regular information on their							
	responsibilities in emergency response							
	operations.							

NM	Areas Reviewed (continued)	Findings	Recommendations
	Clinic staff participated in regular		
	emergency management training and		
	exercises.		
	The clinic conducted fire drills at least once		
	every 12 months for the past 24 months		
	with documented critiques of the drills.		
	The clinic had a policy/procedure for the		
	identification of individuals entering the		
	clinic.		
	The clinic had a Workplace Behavioral		
	Risk Assessment in place.		
	The alarm system or panic buttons in high-		
	risk areas were tested during the past		
	12 months.		
	The clinic had written procedures to follow		
	in the event of a security incident.		
	Clinic employees received training on the new chemical label elements and safety		
	data sheet format.		
NA	The clinic had a policy/procedure for the		
INA	cleaning and disinfection of telehealth		
	equipment.		
Phys	sical Inspection		
	The clinic was clean.		
	The furnishings and equipment were safe		
	and in good repair.		
	Hand hygiene facilities and product		
	dispensers were working and readily		
	accessible to employees.		
	Personal protective equipment was		
	available.		
	Sharps containers were closable, easily		
	accessible, and not overfilled.		

Clinic staff did not store food and drinks in refrigerators or freezers or on countertops or other areas where there is blood or other potentially infectious materials. Sterile commercial supplies were not expired. The clinic minimized the risk of infection when storing and disposing of medical waste. The clinic had unobstructed access to fire alarms/pull stations. The clinic had unobstructed access to fire extinguishers. NA For fire extinguishers located in large rooms or are obscured from view, the clinic identified the locations of the fire extinguishers with signs.	
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identified the locations of the fire	
extinguishers with signs.	
The exit signs were visible from every	
direction.	
Exit routes from the building were unobstructed.	
Staff wore VA-issued identification badges.	
The clinic controlled access to and from	
areas identified as security sensitive.	
NA The clinic had an alarm system or panic	
buttons installed in high-risk areas.	
The clinic's inventory of hazardous	
materials was reviewed for accuracy twice	
within the prior 12 months.	
The clinic's safety data sheets for	
chemicals were readily available for the	
staff.	
The clinic provided visual and auditory	
privacy for veterans at check-in.	
The clinic provided visual and auditory	-
privacy for patients in the interview areas.	

NM	Areas Reviewed (continued)	Findings	Recommendations
	Examination room doors were equipped	_	
	with either an electronic or manual lock.		
NA	A privacy sign was available for use to		
	indicate that a telehealth visit was in		
	progress.		
	Documents containing patient-identifiable		
	information were not visible or unsecured.		
	Clinic staff locked computer screens when		
	they were not in use.		
	Information was not viewable on monitors		
	in public areas.		
	Window coverings, if present, provided		
	privacy.		
	Clinic staff protected patient-identifiable		
	information to maintain patient privacy on		
	laboratory specimens during transport.		
	The clinic had examination room(s) for		
	women veterans which were located in a		
	space where they did not open into a		
	public waiting room or a high-traffic public		
	corridor.		
	The clinic provided adequate privacy for		
	women veterans in the examination rooms.		
	The clinic provided feminine hygiene		
	products in examination rooms where		
	pelvic examinations were performed or in		
	bathrooms within close proximity. Women's public restrooms had feminine		
	hygiene products and disposal bins		
	available for use.		
	Multi-dose medication vials were not		
	expired.		
	All medications were secured from		
	unauthorized access.		
	The information technology network		
	room/server closet was secured/ locked.		
	100111,001 voi 01000t vvao 000a10a/ 1001toa.		

NM	Areas Reviewed (continued)	Findings	Recommendations
	Access to the information technology		
	network room/server closet was 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 was		
	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 46 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 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		
V	treatment plans for HT patients.	Dravidana did nataina 04 at 40 nations UT	4 Managarana dadahat menjalan aing
X	Providers signed HT assessments and	Providers did not sign 24 of 46 patient HT assessments and treatment plans	We recommended that providers sign Home Telehealth assessments and
	treatment plans.	(52 percent).	treatment plans.
	Monthly monitoring notes were	(32 percent).	treatment plans.
	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 49 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 10 of 49 patients (20 percent) of their lab results within the timeframe set by local policy.	2. 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 39 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

This 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 services provided at each location.³

				Out	patient Wo Encounte			Services Provided ⁵	
Location	Station #	Rurality	Outpatient Classification ⁶	PC	Mental Health	Specialty Clinics ⁷	Specialty Care ⁸	Ancillary Services ⁹	
Knoxville, TN	621BY	Urban	Multi-Specialty CBOC	30,900	25,219	5,900	Medicine Specialties Optometry	Audiology MOVE! Diabetic Retinal Program Screening Nutrition Diabetic Care Pharmac Imaging Services Social Wo Kinesiotherapy Vascula Laboratory Laborato	n ¹⁰ n cy ork ar
Rogersville, TN	621GA	Rural	Primary Care CBOC	3,278	416	160	Pain Clinic	MOVE! Program	
Norton, VA	621GC	Rural	Primary Care CBOC	7,140	1,395	159	Pain Clinic	Diabetic Retinal Screening MOVE! Program	
Morristown, TN	621GG	Urban	Primary Care CBOC	5,879	1,171	84	NA	Diabetic Retinal Screening MOVE! Program Pharmacy	

² Includes all CBOCs in operation before August 15, 2015. We have omitted 621QA (Norton), 621QB (Marion), 621QC (Vansant), 621QD (Knoxville), and 621BU (Mountain Home) as no workload/encounters or services were reported.

³ <u>http://vssc.med.va.gov/</u>

⁴ 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.

⁵ 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.

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

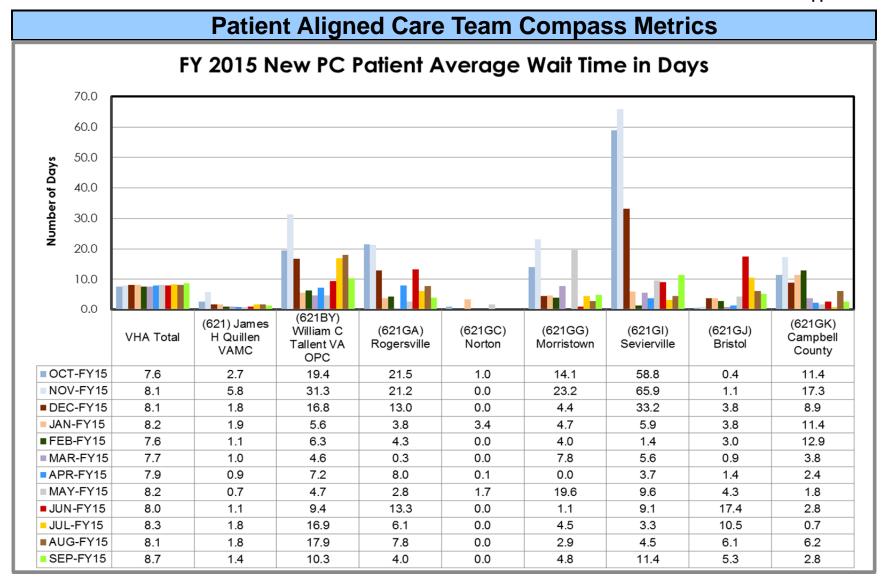
⁷ The total number of encounters for the services provided in the "Specialty Care" column.

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

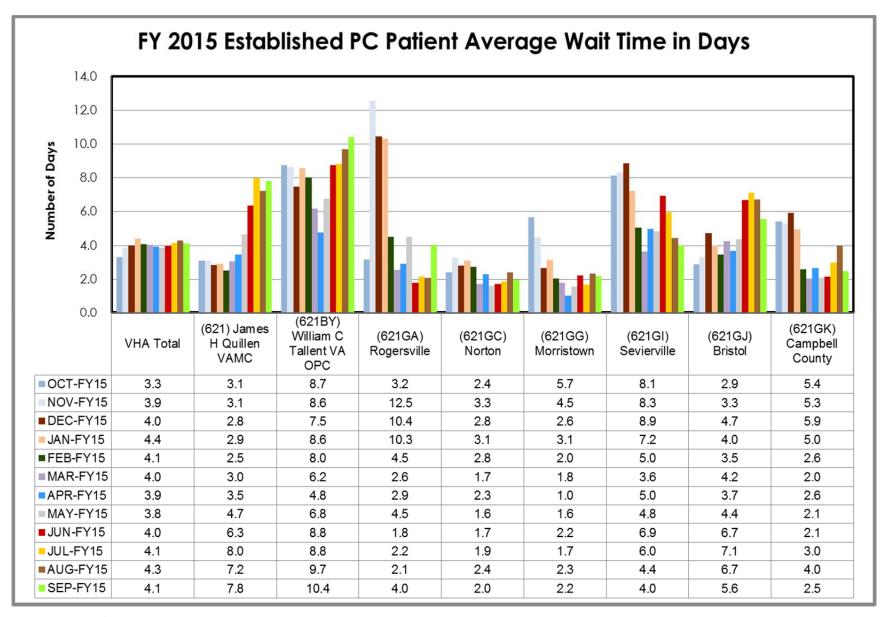
⁹ Ancillary Services refer to non-Primary Care and non-Mental Health services that are not provided by a physician.

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

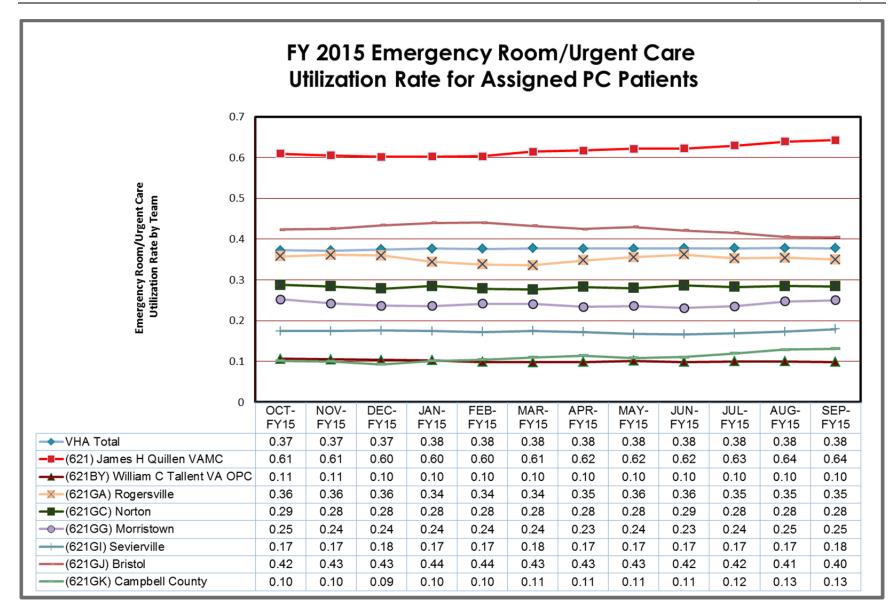
				Outpatient Workload / Encounters			Services Provided	
Location (continued)	Station #	Rurality	Outpatient Classification	PC	Mental Health	Specialty Clinics	Specialty Care	Ancillary Services
Sevierville, TN	621GI	Rural	Primary Care CBOC	6,693	2,582	49	NA	Audiology Diabetic Retinal Screening
Bristol, VA	621GJ	Urban	Primary Care CBOC	8,886	2,714	386	Pain Clinic	Diabetic Retinal Screening MOVE! Program Pharmacy Social Work
Lafollette, TN	621GK	Rural	Other Outpatient Services	3,299	945	13	NA	Diabetic Retinal Screening



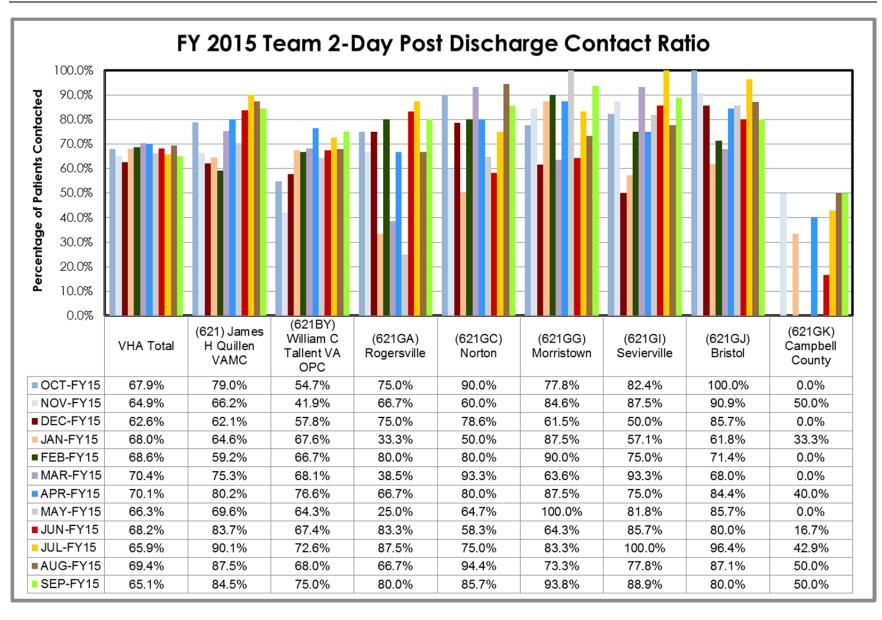
Data Definition. The average number of calendar days between a New Patient's PC completed appointment (clinic stops 322, 323, and 350, excluding Compensation and Pension appointments) and the earliest of three possible preferred (desired) dates (Electronic Wait List (EWL), Cancelled by Clinic Appointment,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



Data Definition. 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.



Data Definition. 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).



Data Definition. 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.

Veterans Integrated Service Network Director Comments

Department of Veterans Affairs

Memorandum

Date: April 15, 2016

From: Director, VA Mid South Healthcare Network (10N9)

Subject: Review of CBOCs and OOCs of James H. Quillen VA Medical

Center, Mountain Home, TN

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

Director, Management Review Service (VHA 10E1D MRS OIG CAP

CBOC)

1. I concur with the findings and recommendation of this Office of Inspector General Community Based Outpatient Clinic Review of the James H. Quillen VA Medical Center, Mountain Home, Tennessee, as well as the action plan developed by the facility.

2. If you have questions or need additional information from the Network, please do not hesitate to contact me at 615-695-2206.



Acting Facility Director Comments

Department of Veterans Affairs

Memorandum

Date: April 11, 2016

From: Acting Director, James H. Quillen VA Medical Center (621/00)

Subject: Review of CBOCs and OOCs of James H. Quillen VA Medical

Center, Mountain Home, TN

To: Director, VA Mid South Healthcare Network (10N9)

 On behalf of the James H. Quillen VA Medical Center, Mountain Home, Tennessee, I concur with the findings and recommendations of this Office of Inspector General report.

Included herein is an outline of improvement actions taken, in progress, or planned in response to these findings. We believe these changes will further enhance key systems and processes throughout our healthcare system.

Daniel Snyder, P.E., 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 providers sign Home Telehealth assessments and treatment plans.

Concur

Target date for completion: September 30, 2016

Facility response: The Home Telehealth providers are responsible for signing Home Telehealth assessments and treatment plans, and the Coordinator or designee is responsible for 100 percent record review to determine whether the provider signature is present. The monitoring will be recorded and be reported to Documentation and Standards Committee on a monthly basis with a target of 100 percent compliance.

Recommendation 2. We recommended that clinicians consistently notify patients of their laboratory results within the timeframe set by local policy.

Concur

Target date for completion: September 30, 2016

Facility response: Clinicians are responsible for consistently notifying patients of laboratory results timely. Clinicians were re-educated in February 2016 regarding the requirements for timely notification. The notification of timely laboratory results will be monitored by the Chief of HIMS or designee to determine compliance. The results will be reported to Documentation and Standards committee with a target of 100 percent compliance.

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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Jim Cooper; Scott DesJarlais; John J. Duncan Jr.; Stephen Fincher;

Chuck Fleischmann; Phil Roe

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

Endnotes

- 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.
- VHA Handbook 1160.01, Uniform Mental Health Services in VA Medical Centers and Clinics, September 11, 2008.
- VHA Handbook 1330.01, Health Care Services for Women Veterans, May 21, 2010.
- VHA Handbook 1605.1, Privacy and Release of Information, May 17, 2006.
- VHA Handbook 1907.01, Health Information Management, July 22, 2014.
- VHA Telehealth Services, Clinic Based Telehealth Operations Manual, July 2014.
- ^b References used for the HT Enrollment review included:
- VHA Office of VHA Telehealth Services Home Telehealth Operations Manual, April 13, 2015. Accessed from: http://vaww.telehealth.va.gov/pgm/ht/index.asp.
- ^c References used for the Outpatient Lab Results Management review included:
- VHA, Communication of Test Results Toolkit, April 2012.
- VHA Handbook 2009-019, Ordering and Reporting Test Results, March 24, 2009.
- ^d References used for the PTSD Care review included:
- Department of Veterans Affairs Memorandum, *Information Bulletin: Clarification of Posttraumatic Stress Disorder Screening Requirements*, August 2015.
- VA/DoD Clinical Practice Guideline for Management of Post-Traumatic Stress, Version 2.0, October 2010.
- VHA Handbook 1160.01, *Uniform Mental Health Services in VA Medical Centers and Clinics*, September 11, 2008.
- VHA Handbook 1160.03, Programs for Veterans with Post-Traumatic Stress Disorder (PTSD), March 12, 2010.
- VHA Technical Manual PTSD, VA Measurement Manual PTSD-51.
- ^e Reference used for Patient Aligned Care Team Compass data graphs:
- Department of Veterans' Affairs, *Patient Aligned Care Teams Compass Data Definitions*, accessed: June 25, 2015.

^a References used for the EOC review included: