DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF INSPECTOR GENERAL

Office of Healthcare Inspections

VETERANS HEALTH ADMINISTRATION

Comprehensive Healthcare Inspection of the James H. Quillen VA Medical Center

Mountain Home, Tennessee

CHIP REPORT | REPORT #18-06508-155 | JULY 2, 2019

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Figure 1. *James H. Quillen VA Medical Center, Mountain Home, Tennessee (Source: https://vaww.va.gov/directory/guide/, accessed on January 10, 2019)*

Abbreviations

CHIP	Comprehensive Healthcare Inspection Program
CLC	community living center
FPPE	focused professional practice evaluation
FY	fiscal year
LIP	licensed independent practitioner
MST	military sexual trauma
OIG	Office of Inspector General
OPPE	ongoing professional practice evaluation
QSV	quality, safety, and value
SAIL	Strategic Analytics for Improvement and Learning
TJC	The Joint Commission
UCC	urgent care center
UM	utilization management
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network

Report Overview

This Office of Inspector General (OIG) Comprehensive Healthcare Inspection Program (CHIP) provides a focused evaluation of the quality of care delivered in the inpatient and outpatient settings of the James H. Quillen VA Medical Center (the facility). The inspection covers key clinical and administrative processes that are associated with promoting quality care.

CHIP inspections are one element of the OIG's overall efforts to ensure that the nation's veterans receive high-quality and timely VA healthcare services. The reviews are performed approximately every three years for each facility. The OIG selects and evaluates specific areas of focus each year.

The OIG team looks at leadership and organizational risks as well as areas affecting quality patient care. At the time of the review, the clinical areas of focus were

1. Quality, safety, and value;
2. Medical staff privileging;
3. Environment of care;
4. Medication management (specifically the controlled substances inspection program);
5. Mental health (focusing on military sexual trauma follow-up and staff training);
6. Geriatric care (spotlighting antidepressant use for elderly veterans);
7. Women's health (particularly abnormal cervical pathology result notification and follow-up); and
8. High-risk processes (specifically the emergency department and urgent care center operations and management).

This unannounced visit was conducted during the week of November 26, 2018. The OIG held interviews and reviewed clinical and administrative processes related to areas of focus that affect patient care outcomes. Although the OIG reviewed a broad spectrum of clinical and administrative processes, the sheer complexity of VA medical facilities limits inspectors' ability to assess all areas of clinical risk. The findings presented in this report are a snapshot of this facility's performance within the identified focus areas at the time of the OIG visit. Although it is difficult to quantify the risk of patient harm, the findings in this report may help this facility and other Veterans Health Administration (VHA) facilities to identify areas of vulnerability or conditions that, if properly addressed, could improve patient safety and healthcare quality.

Results and Inspection Impact

Leadership and Organizational Risks

The facility leadership team consists of the director, chief of staff, associate director for Patient Care Services (ADPCS), and associate director. Organizational communications and accountability are managed through a committee reporting structure, with the Executive Leadership Council having oversight for several working groups. The director and chief of Quality Management are co-chairs of the Quality Executive Board, which is responsible for tracking, identifying trends in, and monitoring quality of care and patient outcomes.

At the time of the OIG's visit, the facility's leadership team had been working together for approximately seven months. The director and ADPCS were permanently assigned January 28, 2017, and April 30, 2017, respectively. The chief of staff was permanently assigned July 1, 2012. The associate director, the newest member of the leadership team, was assigned October 28, 2018.

The OIG noted that selected employee satisfaction survey results indicated that facility leaders were engaged and promoted a culture of safety where employees feel safe bringing forward issues and concerns. The selected patient experience survey scores for facility leaders were better than the VHA average, and facility leaders had implemented processes and plans to maintain positive patient experiences.

Additionally, the OIG reviewed accreditation agency findings, sentinel events,[1] disclosures of adverse patient events, and patient safety indicator data and did not identify any substantial organizational risk factors.

The OIG recognizes that the Strategic Analytics for Improvement and Learning (SAIL) model has limitations for identifying all areas of clinical risk but is "a way to understand the similarities and differences between the top and bottom performers" within VHA.[2] Although the leadership team members were knowledgeable within their areas of responsibility about selected SAIL metrics and community living center (CLC) measures, the leaders should continue to take actions

[1] The definition of sentinel event can be found within VHA Directive 1190, *Peer Review for Quality Management*, November 21, 2018. A sentinel event is an incident or condition that results in patient "death, permanent harm, or severe temporary harm and intervention required to sustain life."

[2] VHA's Office of Operational Analytics and Reporting developed a model for understanding a facility's performance in relation to nine quality domains and one efficiency domain. The domains within SAIL are made up of multiple composite measures, and the resulting scores permit comparison of facilities within a Veterans Integrated Service Network or across VHA. The SAIL model uses a "star rating" system to designate a facility's performance in individual measures, domains, and overall quality. http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=8938. (The website was accessed on March 6, 2019, but is not accessible by the public.)

to sustain and improve performance of the quality of care metrics and measures likely contributing to the facility's SAIL "4-star" and CLC "2-star" quality ratings.[3]

The OIG noted findings in two of the eight clinical areas reviewed and issued five recommendations that are attributable to the director and chief of staff. These are briefly described below.

Medication Management

Overall, the facility complied with requirements for most of the performance indicators evaluated for medication management, including the controlled substances coordinator reports, pharmacy operations, and requirements for controlled substances inspectors. However, the OIG identified noncompliance with the completion of inspections on the day initiated, reconciliation of dispensing and return of stock for one random day, and inspection of the emergency drug cache.

Geriatric Care

For geriatric patients, clinicians documented reasons for prescribing medications, evaluated patient and/or caregiver understanding when education was provided related to newly prescribed medications, and performed medication reconciliation to minimize duplicative medications and adverse interactions. However, the OIG identified inadequate patient and/or caregiver education related to newly prescribed medications.

Summary

In reviewing key healthcare processes, the OIG issued five recommendations for improvement directed to the facility director and chief of staff. The number of recommendations should not be used, however, as a gauge for the overall quality provided at this facility. The intent is for facility leaders to use these recommendations as a road map to help improve operations and clinical care. The recommendations address systems issues as well as other less-critical findings that, if left unattended, may eventually interfere with the delivery of quality health care.

[3] Based on fiscal year 2018, quarter 3 ratings at the time of the site visit.

Comments

The Veterans Integrated Service Network director and facility director agreed with the CHIP review findings and recommendations and provided acceptable improvement plans. (See Appendixes F and G, pages 62–63, and the responses within the body of the report for the full text of the directors' comments.) The OIG 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

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Purpose and Scope

The purpose of the Office of Inspector General (OIG) Comprehensive Healthcare Inspection Program (CHIP) is to provide oversight of healthcare services to veterans. This focused evaluation of the quality of care delivered in the inpatient and outpatient settings of the James H. Quillen VA Medical Center (the facility) is accomplished by examining a broad overview of key clinical and administrative processes associated with quality care and positive patient outcomes. The OIG reports its findings to Veterans Integrated Service Network (VISN) and facility leaders so that informed decisions can be made on improving care.

Effective leaders manage organizational risks by establishing goals, strategies, and priorities to improve care; setting the quality agenda; and promoting a culture to sustain positive change.[4] Investments in a culture of safety and quality improvement with robust communications and leadership significantly contribute to positive patient outcomes in healthcare organizations.[5] Figure 2 shows the direct relationships between leadership and organizational risks and the processes used to deliver health care to veterans.

To examine risks to patients and the organization when core processes are not performed well, the OIG focused on the following nine areas of clinical and administrative operations that support quality care at the facility:

- Leadership and organizational risks
- Quality, safety, and value (QSV)
- Medical staff privileging
- Environment of care
- Medication management (specifically the controlled substances inspection program)
- Mental health (focusing on military sexual trauma follow-up and staff training)
- Geriatric care (spotlighting antidepressant use for elderly veterans)
- Women's health (particularly abnormal cervical pathology results notification and follow-up)

[4] Anam Parand, Sue Dopson, Anna Renz, and Charles Vincent, "The role of hospital managers in quality and patient safety: a systematic review," *British Medical Journal*, 4, no. 9 (September 5, 2014): e005055. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4158193/. (The website was accessed on January 24, 2019.)

[5] Institute for Healthcare Improvement, "How risk management and patient safety intersect: Strategies to help make it happen," March 24, 2015. http://www.npsf.org/blogpost/1158873/211982/How-Risk-Management-and-Patient-Safety-Intersect-Strategies-to-Help-Make-It-Happen. (The website was accessed on January 24, 2019.)

- High-risk processes (specifically the emergency department and urgent care center operations and management).[6]

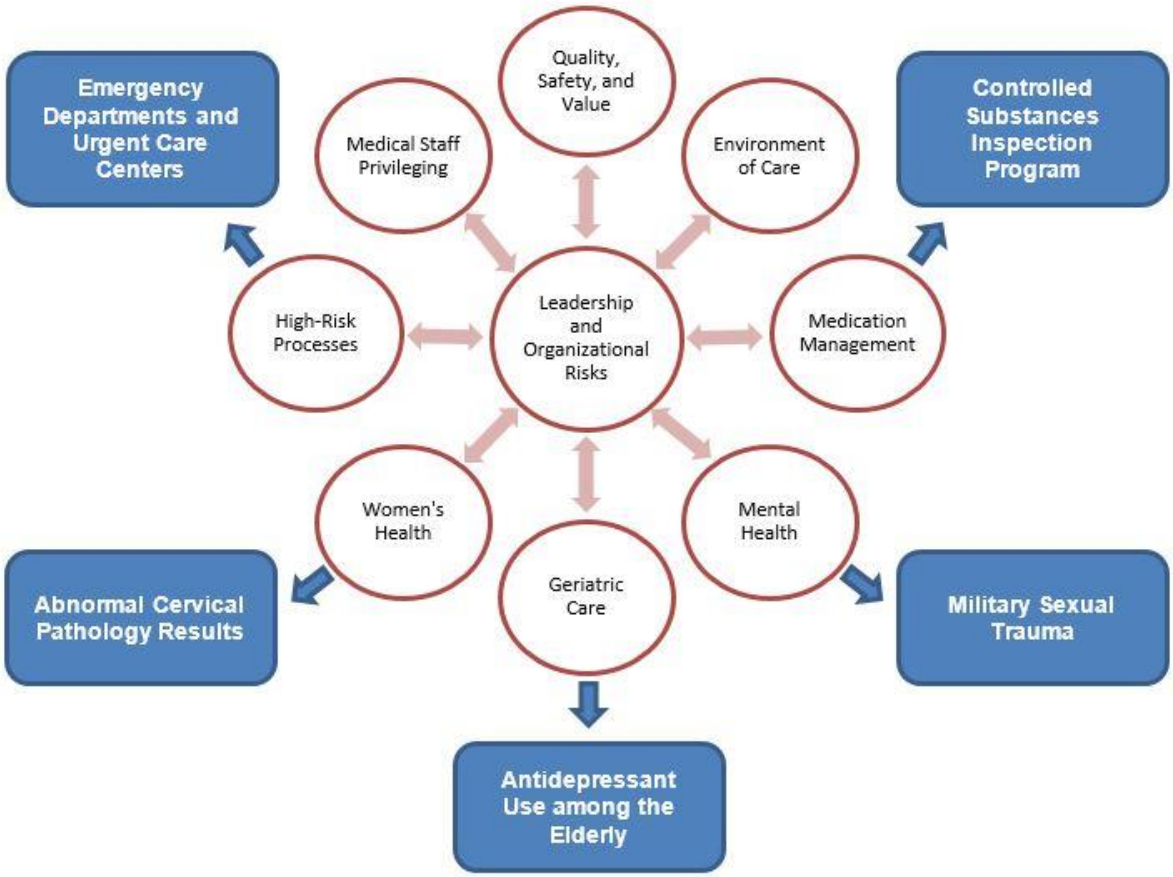

Figure 2. *FY 2019 Comprehensive Healthcare Inspection of Operations and Services*
Source: VA OIG

[6] See Figure 2. CHIP inspections address these processes during fiscal year (FY) 2019 (October 1, 2018, through September 30, 2019); they may differ from prior years' focus areas.

Methodology

To determine compliance with the Veterans Health Administration (VHA) requirements related to patient care quality, clinical functions, and the environment of care, the inspection team reviewed OIG-selected clinical records, administrative and performance measure data, and accreditation survey reports;[7] physically inspected OIG-selected areas; and discussed processes and validated findings with managers and employees. The OIG also interviewed members of the executive leadership team.

The inspection period examined operations from March 19, 2016, through November 30, 2018, the last day of the unannounced week-long site visit.[8]

This report's recommendations for improvement target problems that can influence the quality of patient care significantly enough to warrant OIG follow-up until the facility completes corrective actions. The facility director's comments submitted in response to the report recommendations appear within each topic area.

While on site, the OIG did not receive any complaints beyond the scope of the CHIP review. The OIG conducted the inspection in accordance with OIG standard operating procedures for CHIP reports and Quality Standards for Inspection and Evaluation published by the Council of the Inspectors General on Integrity and Efficiency.

[7] The OIG did not review VHA's internal survey results, instead focusing on OIG inspections and external surveys that affect facility accreditation status.

[8] The range represents the time period from the last Clinical Assessment Program review, which was performed prior to the comprehensive healthcare inspection, to the completion of the unannounced week-long CHIP site visit.

Results and Recommendations

Leadership and Organizational Risks

Stable and effective leadership is critical to improving care and sustaining meaningful change within a VA healthcare facility. Leadership and organizational risks can impact the facility's ability to provide care in all of the selected clinical areas of focus.[9] To assess the facility's risks, the OIG considered the following indicators:

1. Executive leadership position stability and engagement
2. Employee satisfaction
3. Patient experience
4. Accreditation and/or for-cause surveys and oversight inspections
5. Factors related to possible lapses in care
6. VHA performance data

Executive Leadership Position Stability and Engagement

Because each VA facility organizes its leadership structure to address the needs and expectations of the local veteran population it serves, organizational charts may differ across facilities. Figure 3 illustrates this facility's reported organizational structure. The facility has a leadership team consisting of the director, chief of staff, associate director for Patient Care Services (ADPCS), and associate director. The chief of staff, ADPCS, and associate director oversee patient care, which requires managing service directors and chiefs of programs and practices.

[9] L. Botwinick, M. Bisognano, and C. Haraden, "Leadership Guide to Patient Safety," *Institute for Healthcare Improvement*, Innovation Series White Paper. 2006. www.IHI.org (The website was accessed on February 2, 2017.)

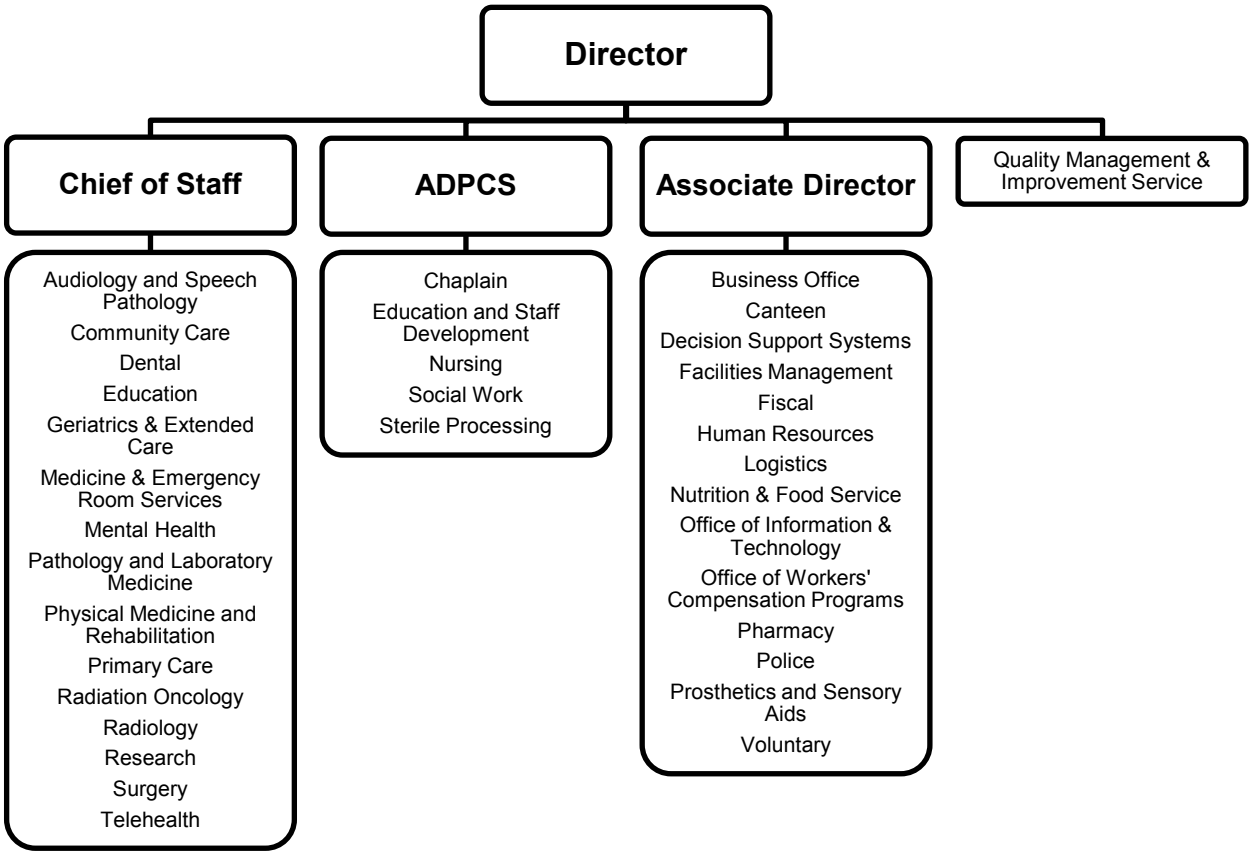

Figure 3. *Facility Organizational Chart*
Source: James H. Quillen VA Medical Center (received November 26, 2018)

At the time of the OIG site visit, the executive team had been working together for approximately seven months (see Table 1).

Table 1. Executive Leader Assignments

Leadership Position	Assignment Date
Facility director	January 28, 2017
Chief of staff	July 1, 2012
Associate director for Patient Care Services	April 30, 2017
Associate director	May 1, 2018 (acting) and October 28, 2018 (permanent)

Source: James H. Quillen VA Medical Center's human resources officer (received November 26, 2018)

To help assess facility executive leaders' engagement, the OIG interviewed the director, chief of staff, ADPCS, and associate director regarding their knowledge of various performance metrics and their involvement and support of actions to improve or sustain performance.

In individual interviews, these executive leadership team members generally were able to speak knowledgeably about actions taken during the previous 12 months in order to maintain or improve performance, as well as employee and patient survey results. In addition, the executive leaders were generally knowledgeable within their scope of responsibilities about selected Strategic Analytics for Improvement and Learning (SAIL) metrics and community living center (CLC) measures. These are discussed in greater detail below.

These leaders are also engaged in monitoring patient safety and care through the Quality Executive Board, for which the director and chief of Quality Management are co-chairs. The Quality Executive Board is responsible for tracking, identifying trends, and monitoring quality of care and patient outcomes and reports to the Executive Leadership Council. The director also serves as the chairperson of the Executive Leadership Council, with the authority and responsibility for establishing policy, maintaining quality care standards, and performing organizational management and strategic planning. The Executive Leadership Council oversees various working groups, such as the Medical Executive Board, Patient Services Executive Board, and Administrative Executive Board. See Figure 4.

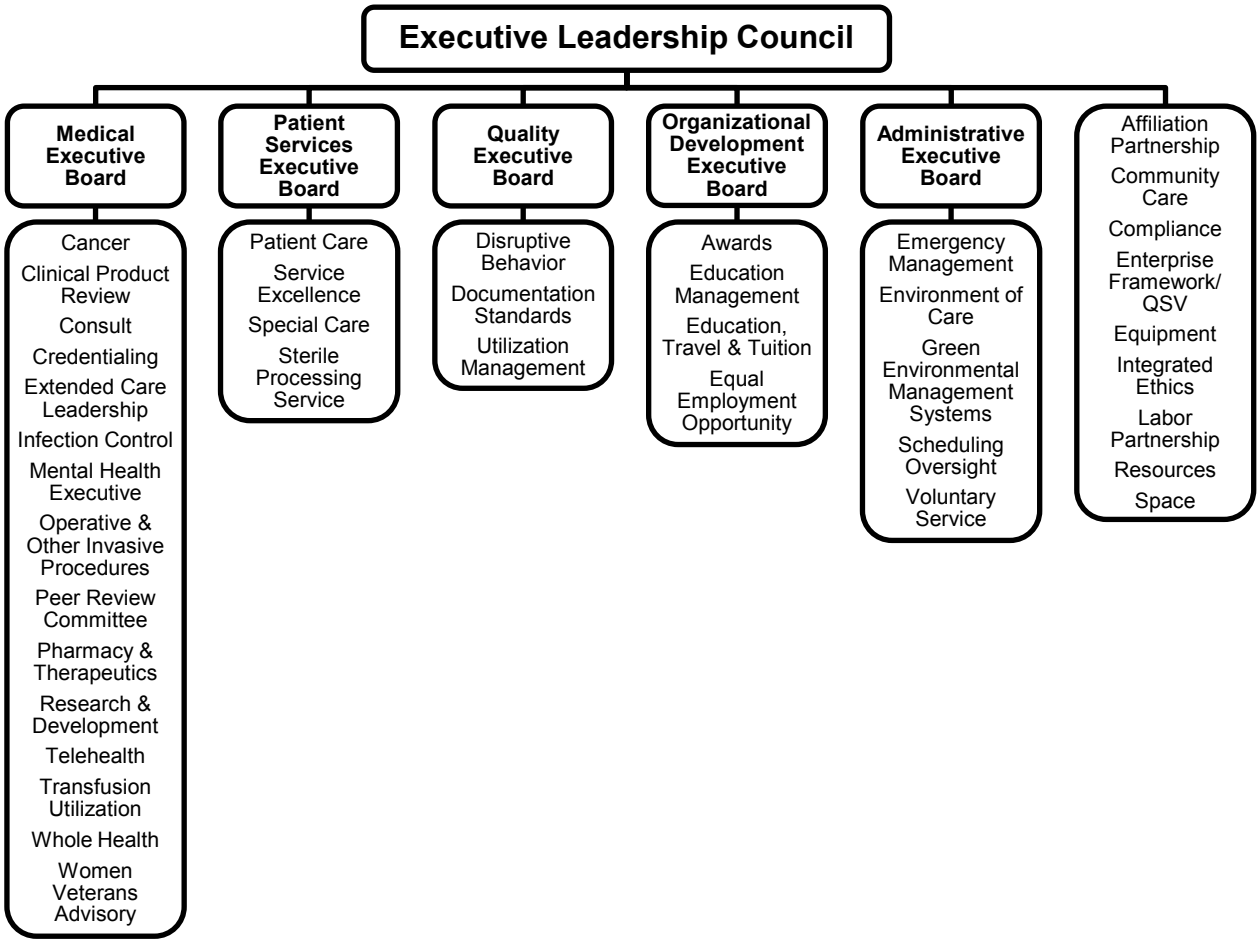

Figure 4. *Facility Committee Reporting Structure*
Source: James H. Quillen VA Medical Center (November 26, 2018)

Employee Satisfaction

The All Employee Survey is an "annual, voluntary, census survey of VA workforce experiences. The data are anonymous and confidential." Since 2001, the instrument has been refined several times in response to VA leaders' inquiries on VA culture and organizational health. Although the OIG recognizes that employee satisfaction survey data are subjective, they can be a starting point for discussions, indicate areas for further inquiry, and be considered along with other information on facility leadership.

To assess employee attitudes toward facility leaders, the OIG reviewed employee satisfaction survey results that relate to the period of October 1, 2017, through September 30, 2018.[10] Table 2

[10] Ratings are based on responses by employees who report to or are aligned under the director, chief of staff, ADPCS, and associate director.

provides relevant survey results for VHA, the facility, and selected facility executive leaders. It summarizes employee attitudes toward these selected facility leaders as expressed in VHA's All Employee Survey. The OIG found the facility average for the selected survey leadership questions was similar to or higher than the VHA average.[11] The same trend was generally noted for the members of the executive leadership team. In all, employees appear generally satisfied with facility leaders.

Table 2. Survey Results on Employee Attitudes toward Facility Leadership (October 1, 2017, through September 30, 2018)

Questions/ Survey Items	Scoring	VHA Average	Facility Average	Director Average	Chief of Staff Average	ADPCS Average	Assoc. Director Average
All Employee Survey: *Servant Leader Index Composite*[12]	0–100 where HIGHER scores are more favorable	71.7	72.8	78.8	82.4	75.4	89.4
All Employee Survey: *In my organization, senior leaders generate high levels of motivation and commitment in the workforce.*	1 (Strongly Disagree) – 5 (Strongly Agree)	3.3	3.4	3.3	3.8	3.6	4.1
All Employee Survey: *My organization's senior leaders maintain high standards of honesty and integrity.*	1 (Strongly Disagree) – 5 (Strongly Agree)	3.5	3.6	4.0	4.2	3.7	4.2

[11] The OIG makes no comment on the adequacy of the VHA average for each selected survey element. The VHA average is used for comparison purposes only.

[12] According to the 2018 VA All Employee Survey (AES) Questions by Organizational Health Framework, Servant Leader Index, "is a summary measure of the work environment being a place where organizational goals are achieved by empowering others. This includes focusing on collective goals, encouraging contribution from others, and then positively reinforcing others' contributions. Servant Leadership occurs at all levels of the organization, where individuals (supervisors, staff) put others' needs before their own."

Questions/ Survey Items	Scoring	VHA Average	Facility Average	Director Average	Chief of Staff Average	ADPCS Average	Assoc. Director Average
All Employee Survey: *I have a high level of respect for my organization's senior leaders.*	1 (Strongly Disagree) – 5 (Strongly Agree)	3.6	3.6	4.0	4.0	3.7	4.1

Source: VA All Employee Survey (accessed October 26, 2018)

Table 3 summarizes employee attitudes toward the workplace, also as expressed in VHA's All Employee Survey. Note that the facility and executive leadership team averages for the selected survey questions were similar to or better than the VHA average. Facility leaders appear to be maintaining an environment where employees feel safe bringing forth issues and concerns.

Table 3. Survey Results on Employee Attitudes toward Workplace (October 1, 2017, through September 30, 2018)

Questions/ Survey Items	Scoring	VHA Average	Facility Average	Director Average	Chief of Staff Average	ADPCS Average	Assoc. Director Average
All Employee Survey: *I can disclose a suspected violation of any law, rule, or regulation without fear of reprisal.*	1 (Strongly Disagree) – 5 (Strongly Agree)	3.8	3.8	4.1	4.1	3.8	4.5
All Employee Survey: *Employees in my workgroup do what is right even if they feel it puts them at risk (e.g., risk to reputation or promotion, shift reassignment, peer relationships, poor performance review, or risk of termination).*	1 (Strongly Disagree) – 5 (Strongly Agree)	3.7	3.7	4.0	4.0	3.7	4.4

Questions/ Survey Items	Scoring	VHA Average	Facility Average	Director Average	Chief of Staff Average	ADPCS Average	Assoc. Director Average
All Employee Survey: *In the past year, how often did you experience moral distress at work (i.e., you were unsure about the right thing to do or could not carry out what you believed to be the right thing)?*	0 (Never) – 6 (Every Day)	1.5	1.4	1.4	0.8	1.4	1.1

Source: VA All Employee Survey (accessed October 26, 2018)

Patient Experience

To assess patient attitudes toward facility leaders, the OIG reviewed patient experience survey results that relate to the period of October 1, 2017, through July 31, 2018. VHA's Patient Experiences Survey Reports provide results from the Survey of Healthcare Experience of Patients (SHEP) program. VHA uses industry standard surveys from the Consumer Assessment of Healthcare Providers and Systems program to evaluate patients' experiences with their health care and to support benchmarking its performance against the private sector. Table 4 provides relevant survey results for facility leadership and compares the results to the overall VHA averages.[13]

VHA also collects SHEP survey data from Patient-Centered Medical Home, Specialty Care, and Inpatient Surveys. The OIG reviewed responses to four relevant survey questions that reflect patients' attitudes toward facility leaders (see Table 4). For this facility, all four patient survey results reflected higher care ratings than the VHA average. Patients were generally satisfied with the leadership and care provided, and facility leaders appeared to be actively engaged with patients.

[13] Ratings are based on responses by patients who received care at this facility.

Table 4. Survey Results on Patient Attitudes toward Facility Leadership (October 1, 2017, through July 31, 2018)

Questions	Scoring	VHA Average	Facility Average
Survey of Healthcare Experiences of Patients (inpatient): *Would you recommend this hospital to your friends and family?*	The response average is the percent of "Definitely Yes" responses.	66.9	78.0
Survey of Healthcare Experiences of Patients (inpatient): *I felt like a valued customer.*	The response average is the percent of "Agree" and "Strongly Agree" responses.	84.2	85.4
Survey of Healthcare Experiences of Patients (outpatient Patient-Centered Medical Home): *I felt like a valued customer.*	The response average is the percent of "Agree" and "Strongly Agree" responses.	76.1	80.7
Survey of Healthcare Experiences of Patients (outpatient specialty care): *I felt like a valued customer.*	The response average is the percent of "Agree" and "Strongly Agree" responses.	76.3	76.5

Source: VHA Office of Reporting, Analytics, Performance, Improvement and Deployment (accessed October 26, 2018)

Accreditation Surveys and Oversight Inspections

To further assess leadership and organizational risks, the OIG reviewed recommendations from previous inspections and surveys, including those conducted for cause, by oversight and accrediting agencies to gauge how well leaders respond to identified problems.[14] Table 5 summarizes the relevant facility inspections most recently performed by the OIG and The Joint Commission (TJC).[15] During the on-site review, the OIG noted that the most recent OIG hotline report had two open recommendations, which have subsequently been closed (see Table 5).[16]

At the time of the site visit, the OIG also noted the facility's current accreditation status with the Commission on Accreditation of Rehabilitation Facilities and College of American Pathologists.[17] Additional results included the Long Term Care Institute's inspection of the facility's CLC.[18]

[14] The Joint Commission (TJC) conducts for-cause unannounced surveys in response to serious incidents relating to the health and/or safety of patients or staff or other reported complaints. The outcomes of these types of activities may affect the accreditation status of an organization.

[15] According to VHA Directive 1100.16, *Accreditation of Medical Facility and Ambulatory Programs*, May 9, 2017, TJC provides an "internationally accepted external validation that an organization has systems and processes in place to provide safe and quality-oriented health care." TJC "has been accrediting VA medical facilities for over 35 years." Compliance with TJC standards "facilitates risk reduction and performance improvement."

[16] A closed status indicates that the facility has implemented corrective actions and improvements to address findings and recommendations, not by self-certification, but as determined by the accreditation organization or inspecting agency.

[17] According to VHA Directive 1170.01, *Accreditation of Veterans Health Administration Rehabilitation Programs,* May 9, 2017, the Commission on Accreditation of Rehabilitation Facilities "provides an international, independent, peer review system of accreditation that is widely recognized by Federal agencies." VHA's commitment is supported through a system-wide, long-term joint collaboration with the Commission on Accreditation of Rehabilitation Facilities to achieve and maintain national accreditation for all appropriate VHA rehabilitation programs; According to the College of American Pathologists, for 70 years it has "fostered excellence in laboratories and advanced the practice of pathology and laboratory science." College of American Pathologists. https://www.cap.org/about-the-cap. (The website was accessed on February 20, 2019.); In accordance with VHA Handbook 1106.01, *Pathology and Laboratory Medicine Service (P&LMS) Procedures*, January 29, 2016, VHA laboratories must meet the requirements of the College of American Pathologists.

[18] The Long Term Care Institute states that it has been to over 4,000 healthcare facilities conducting quality reviews and over 1,145 external regulatory surveys since 1999. The Long Term Care Institute is "focused on long-term care quality and performance improvement; compliance program development; and review in long-term care, hospice, and other residential care settings." Long Term Care Institute. http://www.ltciorg.org/about-us/. (The website was accessed on March 6, 2019.)

Table 5. Office of Inspector General Inspections/Joint Commission Survey

Accreditation or Inspecting Agency	Date of Visit	Number of Recommendations Issued	Number of Recommendations Remaining Open
OIG (*Combined Assessment Program Review of the James H. Quillen VA Medical Center, Mountain Home, Tennessee, Report No. 16-00112-267, April 21, 2016*)	March 2016	3	0
OIG (*Review of Community Based Outpatient Clinics and Other Outpatient Clinics of James H. Quillen VA Medical Center, Mountain Home, Tennessee, Report No. 16-00024-299, May 12, 2016*)	March 2016	2	0
OIG (*Healthcare Inspection – Mental Health Services Concerns at the Knoxville VA Outpatient Clinic, James H. Quillen VA Medical Center, Mountain Home, Tennessee, Report No. 14-04435-265, June 7, 2016*)	March 2015	2	0
OIG (*Colorectal Screening, Timely Colonoscopies, and Physician Coverage in the Intensive Care Unit at the James H. Quillen VA Medical Center, Mountain Home, Tennessee, Report No. 16-02940-183, May 31, 2018*)	May 2016 August 2016	6[19]	2
TJC • Hospital Accreditation • Behavioral Health Care Accreditation • Home Care Accreditation	January 2017	 31 4 0	 0 0 0

Sources: OIG and TJC (Inspection/survey results verified with the director on November 28, 2018)

[19] Although the report included seven recommendations, one recommendation was directed to the Veterans Integrated Service Network 9 director.

Factors Related to Possible Lapses in Care

Within the healthcare field, the primary organizational risk is the potential for patient harm. Many factors affect the risk for patient harm within a system, including hazardous environmental conditions; poor infection control practices; and patient, staff, and public safety. Leaders must be able to understand and implement plans to minimize patient risk through consistent and reliable data and reporting mechanisms. Table 6 lists the reported patient safety events from March 19, 2016, (the prior comprehensive OIG inspection), through November 30, 2018.[20]

Table 6. Summary of Selected Organizational Risk Factors (March 19, 2016, through November 30, 2018)

Factor	Number of Occurrences
Sentinel Events[21]	0
Institutional Disclosures[22]	3
Large-Scale Disclosures[23]	0

Source: James H. Quillen VA Medical Center's chief of Quality Management (received November 27, 2018)

The OIG also reviewed patient safety indicators developed by the Agency for Healthcare Research and Quality within the U.S. Department of Health and Human Services. These provide information on potential in-hospital complications and adverse events following surgeries and procedures.[24] The rates presented are specifically applicable for this facility, and lower rates

[20] It is difficult to quantify an acceptable number of adverse events affecting patients because even one is too many. Efforts should focus on prevention. Events resulting in death or harm and those that lead to disclosure can occur in either inpatient or outpatient settings and should be viewed within the context of the complexity of the facility. (Note that the James H. Quillen VA Medical Center is a mid-high complexity (1c) affiliated facility as described in Appendix B.)

[21] The definition of sentinel event can be found within VHA Directive 1190, *Peer Review for Quality Management*, November 21, 2018. A sentinel event is an incident or condition that results in patient "death, permanent harm, or severe temporary harm and intervention required to sustain life."

[22] According to VHA Directive 1004.08, *Disclosure of Adverse Events To Patients*, October 31, 2018, VHA defines an institutional disclosure of adverse events (sometimes referred to as an "administrative disclosure") as "a formal process by which VA medical facility leaders together with clinicians and others, as appropriate, inform the patient or [his or her] personal representative that an adverse event has occurred during the patient's care that resulted in, or is reasonably expected to result in, death or serious injury, and provide specific information about the patient's rights and recourse."

[23] According to VHA Directive 1004.08, *Disclosure of Adverse Events to Patients*, October 31, 2018, VHA defines large-scale disclosures of adverse events (sometimes referred to as "notifications") as "a formal process by which VHA officials assist with coordinating the notification to multiple patients (or their personal representatives) that they may have been affected by an adverse event resulting from a systems issue."

[24] Agency for Healthcare Research and Quality. https://www.qualityindicators.ahrq.gov/. (The website was accessed on December 11, 2017.)

indicate lower risks. Table 7 summarizes patient safety indicator data from July 1, 2016, through June 30, 2018.

Table 7. Patient Safety Indicator Data (July 1, 2016, through June 30, 2018)

Indicators	Reported Rate per 1,000 Hospital Discharges		
	VHA	VISN 9	Facility
Pressure ulcer	0.76	1.04	0.19
Death among surgical inpatients with serious treatable conditions	114.89	112.84	66.67
Iatrogenic pneumothorax[25]	0.15	0.11	0.12
Central venous catheter-related bloodstream infection	0.16	0.19	0.19
In-hospital fall with hip fracture	0.09	0.05	0.13
Perioperative hemorrhage or hematoma	2.59	1.88	0.00
Postoperative acute kidney injury requiring dialysis	0.96	1.05	1.93
Postoperative respiratory failure	4.88	4.73	1.20
Perioperative pulmonary embolism or deep vein thrombosis	3.05	3.95	3.47
Postoperative sepsis	3.70	6.66	2.99
Postoperative wound dehiscence (rupture along incision)	0.93	1.31	0.00
Unrecognized abdominopelvic accidental puncture or laceration	1.07	0.52	0.00

Source: VHA Support Service Center
Note: The OIG did not assess VA's data for accuracy or completeness.

Five patient safety indicator measures (iatrogenic pneumothorax, central venous catheter-related bloodstream infection, in-hospital fall with hip fracture, postoperative acute kidney injury requiring dialysis, and perioperative pulmonary embolism or deep vein thrombosis) show a reported rate higher than or equal to VHA and/or VISN 9.

One patient was reported to have suffered an iatrogenic pneumothorax, but this was documented incorrectly. An infectious disease provider and a facility pulmonologist reviewed the patient's chest x-ray to verify that there was no iatrogenic pneumothorax. The Operative and Other

[25] According to Northwestern Memorial Hospital, "A Pneumothorax is a type of lung injury that allows air to leak into the area between the lungs and the chest wall, which causes mild to severe chest pain and shortness of breath. An Iatrogenic Pneumothorax is caused by medical treatment, often as an incidental event during a procedure such as a pacemaker insertion." Northwestern Medicine. http://www.nmh.org/nm/quality-lung-injury-due-to-medical-care. (The website was accessed on March 6, 2019.)

Invasive Procedures Committee also reviewed the patient's care and determined the patient did not suffer an iatrogenic pneumothorax.

A single patient developed a central venous catheter-related bloodstream infection. This case was reviewed by Infectious Disease specialists who, through the Special Care and Infection Control Committees, implemented a recommendation to prevent reoccurrences.

A single patient sustained a hip fracture after an in-hospital fall. A root cause analysis was completed, and actions were taken to prevent future reoccurrences.

Two patients experienced a postoperative acute kidney injury requiring dialysis. The attending physicians and service chiefs involved in the patients' surgery and the Operative and Other Invasive Procedures Committee reviewed the patients' care. The committee determined that although both patients experienced septic shock and required dialysis during the course of their treatment, care was appropriate and the patients recovered.

Six patients developed a perioperative pulmonary embolism or deep vein thrombosis. All six cases were individually reviewed and discussed in aggregate, and two cases were peer reviewed. Facility staff conducted a root cause analysis for one case and in May 2018 implemented a new anticoagulation policy with very clear roles and responsibilities for the safe ordering and monitoring of anticoagulation therapy.

Veterans Health Administration Performance Data

The VA Office of Operational Analytics and Reporting adapted the SAIL Value Model to help define performance expectations within VA. This model includes "measures on healthcare quality, employee satisfaction, access to care, and efficiency." It does, however, have noted limitations for identifying all areas of clinical risk. The data are presented as one way to "understand the similarities and differences between the top and bottom performers" within VHA.[26]

VA also uses a star-rating system where facilities with a "5-star" rating are performing within the top 10 percent of facilities and "1-star" facilities are performing within the bottom 10 percent of facilities. Figure 5 describes the distribution of facilities by star rating.[27] As of June 30, 2018, the facility was rated as "4-star" for overall quality.

[26] VHA Support Service Center (VSSC), The Strategic Analytics for Improvement and Learning (SAIL) Value Model, http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=8938. (The website was accessed on March 7, 2019, but is not accessible by the public.)

[27] According to the methods established by the SAIL Model, this is based on normal distribution ranking of the quality domain for 130 VA Medical Centers.

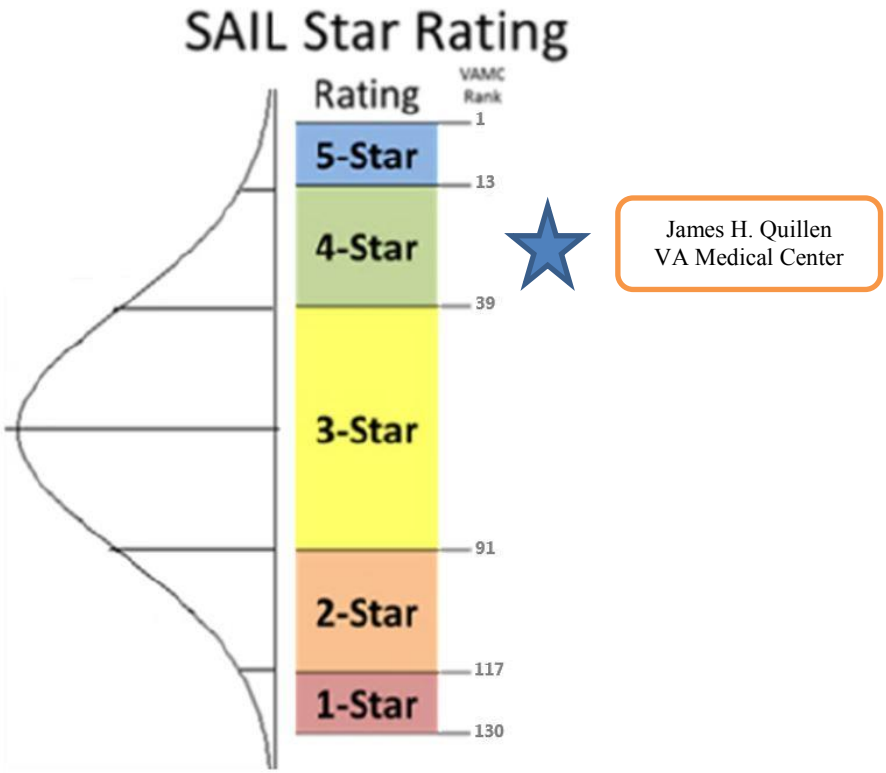

Figure 5. *Strategic Analytics for Improvement and Learning Star Rating Distribution (as of June 30, 2018)*
Source: VA Office of Informatics and Analytics Office of Operational Analytics and Reporting (accessed October 26, 2018)

Figure 6 illustrates the facility's quality of care and efficiency metric rankings and performance compared with other VA facilities as of June 30, 2018. Of note, Figure 6 uses blue and green data points to indicate high performance (for example, in the areas of mental health (MH) continuity (of) care, complications, rating (of) hospital, adjusted length of stay (LOS), and registered nurse (RN) Turnover).[28] Metrics that need improvement are denoted in orange and red (for example, health care (HC) associated (Assoc) infections, rating (of) primary care (PC) provider, stress discussed, and mental health (MH) population (Popu) coverage).

[28] For information on the acronyms in the SAIL metrics, please see Appendix D.

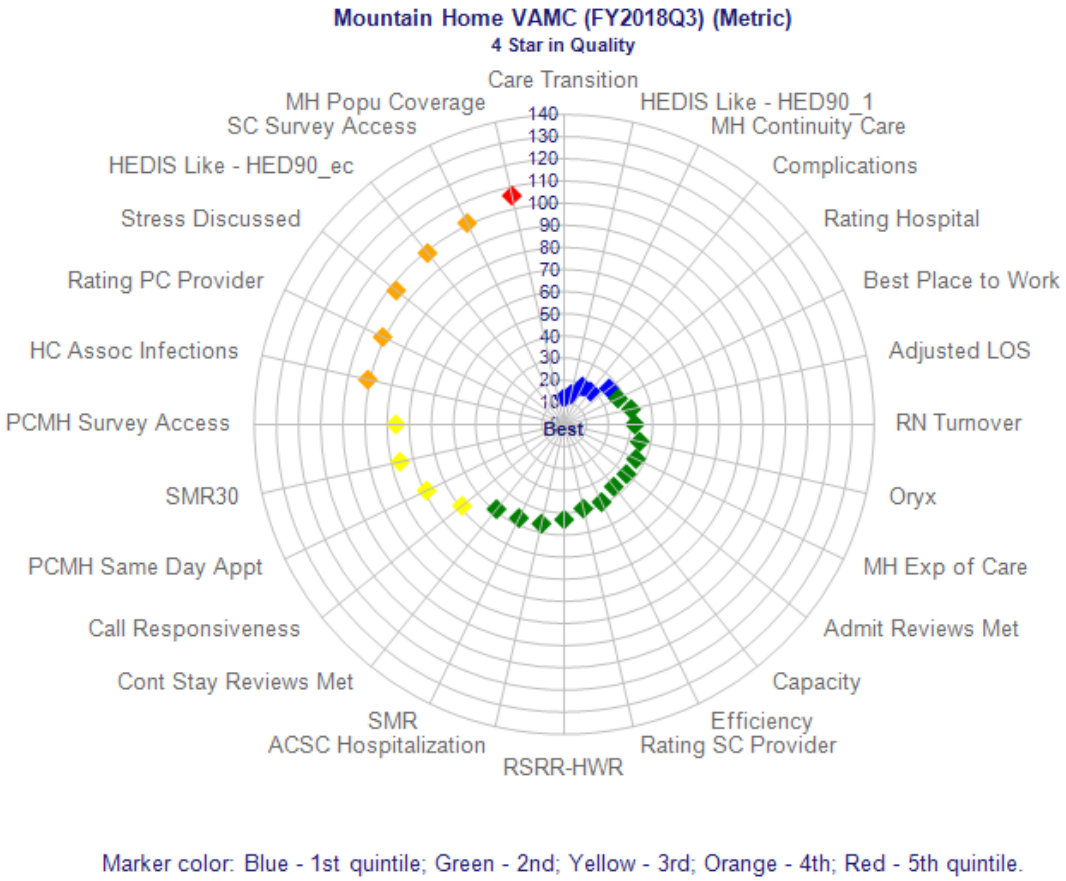

Figure 6. *Facility Quality of Care and Efficiency Metric Rankings (as of June 30, 2018)*
Source: VHA Support Service Center
Note: The OIG did not assess VA's data for accuracy or completeness. Also see Appendix C for sample outpatient performance measures that feed into these data points (such as wait times, discharge contacts, and where patient care is received). Data definitions are provided in Appendix D.

The SAIL Value Model also includes "SAIL CLC," which is a tool to summarize and compare the performance of CLCs in the VA. The SAIL model leverages much of the same data used in The Centers for Medicare & Medicaid Services' (CMS) *Nursing Home Compare*.[29] The SAIL CLC provides a single resource to review quality measures and health inspection results. It

[29] According to Center for Innovation and Analytics, *Strategic Analytics for Improvement and Learning (SAIL) for Community Living Centers (CLC)*, November 19, 2018, "In December 2008, The Centers for Medicare & Medicaid Services (CMS) enhanced its *Nursing Home Compare* public reporting site to include a set of quality ratings for each nursing home that participates in Medicare or Medicaid. The ratings take the form of several "star" ratings for each nursing home. The primary goal of this rating system is to provide residents and their families with an easy way to understand assessment of nursing home quality; making meaningful distinctions between high and low performing nursing homes."

includes star ratings for an unannounced survey, staffing, quality, and overall results.[30] Table 8 summarizes the rating results for the facility's CLC as of June 30, 2018. Although the facility has an overall "3-star" rating, its rating for quality is only a "2-star," which is determined by the performance indicators detailed in Table 8.

Table 8. Facility CLC Star Ratings (as of June 30, 2018)

Domain	Star Rating
Unannounced Survey	★★
Staffing	★★★★★
Quality	★★
Overall	★★★

Source: VHA Support Service Center

In exploring the reasons for the "2-star" quality rating, the OIG considered the radar diagram showing CLC performance relative to other CLCs for all 13 quality measures. Figure 7 illustrates the facility's CLC quality rankings and performance compared with other VA CLCs as of June 30, 2018. Figure 7 uses blue and green data points to indicate high performance (for example, in the areas of help with activities of daily living (ADL)–long stay (LS), new or worse pressure ulcer (PU)–short stay (SS) and improvement in function (SS). Metrics that need improvement and were likely the reasons why the facility had a "2-star" for Quality are denoted in orange and red (for example, urinary tract infection (UTI) (LS), moderate-severe pain (SS), and ability to move independently worsened (LS)).[31]

[30] *Strategic Analytics for Improvement and Learning (SAIL) for Community Living Centers (CLC)*, Center for Innovation & Analytics (last updated November 19, 2018). http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=7410. (The website was accessed on March 6, 2019, but is not accessible by the public.)

[31] For data definitions of acronyms in the SAIL CLC measures, please see Appendix E.

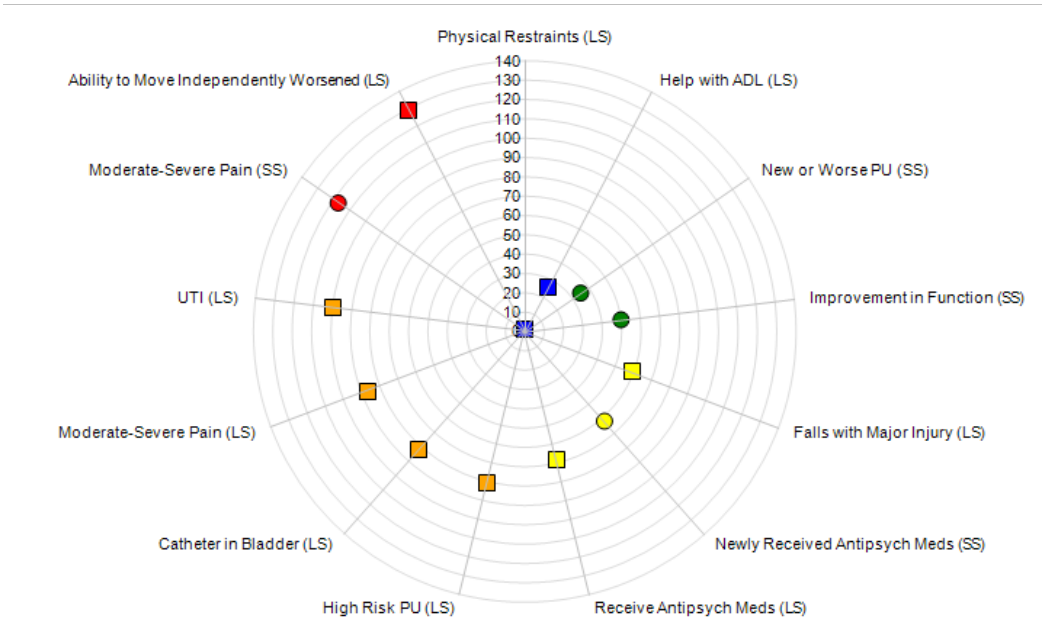

Figure 7. *Facility CLC Quality Measure Rankings (as of June 30, 2018)*
LS = Long-Stay Measure SS = Short-Stay Measure
Source: VHA Support Service Center
Note: The OIG did not assess VA's data for accuracy or completeness. For data definitions, see Appendix E.

Leadership and Organizational Risks Conclusion

The facility's executive leadership team appeared stable, with three of the four positions permanently filled for over one year prior to the OIG's on-site visit. Selected survey scores related to employees' satisfaction and trust in the facility's executive leaders were better than VHA averages. Patient experience survey data revealed that scores related to satisfaction with the facility were above VHA averages. The facility leaders appeared actively engaged with employees and patients, and were working to sustain and further improve employee and patient engagement and satisfaction. The leaders appeared to support efforts to improve and maintain patient safety, quality care, and other positive outcomes. The OIG's review of the facility's accreditation findings, sentinel events, disclosures, and patient safety indicator data did not identify any substantial organizational risk factors. The leadership team was knowledgeable within their scope of responsibility about selected SAIL and SAIL CLC metrics but should continue to take actions to sustain and improve performance of measures contributing to the SAIL "4-star" and CLC "2-star" quality ratings.

Quality, Safety, and Value

VHA's goal is to serve as the nation's leader in delivering high-quality, safe, reliable, and veteran-centered care that involves coordinating care among members of the healthcare team. To meet this goal, VHA must foster a culture of integrity and accountability in which personnel are vigilant and mindful, proactively risk-aware, and committed to consistently providing quality care, while seeking continuous improvement.[32] VHA also strives to provide healthcare services that compare favorably to the best of the private sector in measured outcomes, value, and efficiency.[33] VHA requires that its facilities operate a quality, safety, and value (QSV) program to monitor the quality of patient care and performance improvement activities.[34]

In determining whether the facility implemented and incorporated several OIG-selected key functions of VHA's enterprise framework for QSV into local activities, the inspection team evaluated protected peer reviews of clinical care,[35] utilization management (UM) reviews,[36] patient safety incident reporting with related root cause analyses,[37] and cardiopulmonary resuscitation (CPR) episode reviews.[38]

When conducted systematically and credibly, protected peer reviews reveal areas for improvement (involving one or more providers' practices) and can result in both immediate and long-term improvements in patient care. Peer reviews are intended to promote confidential and nonpunitive processes that consistently contribute to quality management efforts at the individual provider level.[39]

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[32] VHA Directive 1026, *VHA Enterprise Framework for Quality, Safety, and Value*, August 2, 2013. (This VHA directive was scheduled for recertification on or before the last working day of August 2018 and has not been recertified.)

[33] Department of Veterans Affairs, *Veterans Health Administration Blueprint for Excellence*, September 2014.

[34] VHA Directive 1026.

[35] The definition of a peer review can be found within VHA Directive 1190, *Peer Review for Quality Management*, November 21, 2018. A peer review is a critical review of care, performed by a peer, to evaluate care provided by a clinician for a specific episode of care, to identify learning opportunities for improvement, to provide confidential communication of the results back to the clinician, and to identify potential system or process improvements.

[36] According to VHA Directive 1117(1), *Utilization Management Program*, July 9, 2014 (amended January 18, 2018), UM reviews include evaluating the "appropriateness, medical need, and efficiency of health care services according to evidence-based criteria."

[37] The definition of a root cause analysis can be found within VHA Handbook 1050.01, *VHA National Patient Safety Improvement Handbook*, March 4, 2011. (This VHA Handbook was scheduled for recertification on or before the last working date of March 2016 and has not been recertified.) A root cause analysis is "a process for identifying the basic or contributing causal factors that underlie variations in performance associated with adverse events or close calls."

[38] VHA Directive 1177, *Cardiopulmonary Resuscitation*, August 28, 2018.

[39] VHA Directive 1190.

The UM program, a key component of VHA's framework for quality, safety, and value, provides vital tools for managing the quality and the efficient use of resources. It strives to ensure that the right care occurs in the right setting, at the right time, and for the right reason using evidence-based practices and continuous measurement to guide improvements.[40]

Among VHA's approaches for improving patient safety is the mandated reporting of patient safety incidents to its National Center for Patient Safety. Incident reporting helps VHA learn about system vulnerabilities and how to address them. Required root cause analyses help to more accurately identify and rapidly communicate potential and actual causes of harm to patients throughout the facility.[41]

VHA has also issued guidance to support its strategic priority of providing personalized, proactive, patient-driven care and to ensure that the provision of life-sustaining treatments, including CPR, is aligned with patients' values, goals, and preferences. VHA requires that each facility establishes a CPR Committee or equivalent that fully reviews each episode of care in which resuscitation was attempted. The ongoing review and analysis of high-risk healthcare processes is essential for ensuring patient safety and the provision of high-quality care. VHA also has established requirements for basic life support and advanced cardiac life support training and certification for clinicians responsible for administering life-sustaining treatments.[42]

The OIG interviewed senior managers and key QSV employees and evaluated meeting minutes, protected peer reviews, root cause analyses, the annual patient safety report, and other relevant documents. Specifically, OIG inspectors evaluated the following performance indicators:[43]

- Protected peer reviews
    - Evaluation of aspects of care (for example, choice and timely ordering of diagnostic tests, prompt treatment, and appropriate documentation)
    - Implementation of improvement actions recommended by the Peer Review Committee
    - Completion of final reviews within 120 calendar days
    - Quarterly review of Peer Review Committee's summary analysis by the Medical Executive Committee

[40] VHA Directive 1117(1).

[41] VHA Handbook 1050.01.

[42] VHA Directive 1177, VHA Handbook 1004.03, *Life-Sustaining Treatment Decisions: Eliciting, Documenting and Honoring Patients' Values, Goals and Preferences*, January 11, 2017.

[43] For CHIP reviews, the OIG selects performance indicators based on VHA or regulatory requirements or accreditation standards and evaluates these for compliance.

  - Peer review of all applicable deaths within 24 hours of admission to the hospital
  - Peer review of all completed suicides within seven days after discharge from an inpatient mental health unit[44]
- UM
  - Completion of at least 75 percent of all required inpatient reviews
  - Documentation of at least 75 percent of physician UM advisors' decisions in the National UM Integration database
  - Interdisciplinary review of UM data
- Patient safety
  - Annual completion of a minimum of eight root cause analyses[45]
  - Inclusion of required content in root cause analyses (generally)
  - Submission of completed root cause analyses to the National Center for Patient Safety within 45 days
  - Provision of feedback about root cause analysis actions to reporting employees
  - Submission of annual patient safety report to facility leaders
- Resuscitation episode review
  - Evidence of a committee responsible for reviewing resuscitation episodes
  - Confirmation of actions taken during resuscitative events being consistent with patients' wishes
  - Evidence of basic or advanced cardiac life support certification for code team responders
  - Evaluation of each resuscitation episode by the CPR Committee or equivalent

Quality, Safety, Value Conclusion

Generally, the facility met requirements with the above performance indicators. The OIG made no recommendations.

[44] VHA Directive 1190.

[45] According to VHA Handbook 1050.01, "the requirement for a total of eight [root cause analyses] and Aggregated Reviews is a minimum number, as the total number of [root cause analyses] is driven by the events that occur and the [Safety Assessment Code] SAC score assigned to them. At least four analysis per fiscal year must be individual [root cause analyses], with the balance being Aggregated Reviews or additional individual [root cause analyses]."

Medical Staff Privileging

VHA has defined procedures for the clinical privileging of all healthcare professionals who are permitted by law and the facility to practice independently—"without supervision or direction, within the scope of the individual's license, and in accordance with individually granted clinical privileges." These healthcare professionals are also referred to as licensed independent practitioners (LIPs).[46]

Clinical privileges need to be specific, based on the individual's clinical competence. They are recommended by service chiefs and the Medical Staff Executive Committee and approved by the director. Clinical privileges are granted for a period not to exceed two years, and LIPs must undergo re-privileging prior to their expiration.[47]

VHA defines the focused professional practice evaluation (FPPE) as "a time-limited period during which the medical staff leadership evaluates and determines the practitioner's professional performance. The FPPE typically occurs at the time of initial appointment to the medical staff or the granting of new, additional privileges." "The on-going monitoring of privileged practitioners, Ongoing Professional Practice Evaluation[s] (OPPE), [are] essential to confirm the quality of care delivered."[48]

According to TJC, the "FPPE for Cause" should be used when a question arises regarding a privileged provider's ability to deliver safe, high-quality patient care. The "FPPE for Cause" is limited to a particular timeframe and customized to the specific provider and related clinical concerns.[49] Federal law requires VA facilities to report to the National Practitioner Data Bank when facilities take adverse clinical privileging actions, accept the surrender of clinical privileges, or restrict clinical privileges when the action is related to professional competence or professional conduct of LIPs.[50]

To determine whether the facility complied with requirements for privileging, the OIG interviewed key managers and selected and reviewed the privileging folders of several medical staff members:

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[46] VHA Handbook 1100.19, *Credentialing and Privileging*, October 15, 2012. (This VHA Handbook was scheduled for recertification on or before the last working date of October 2017 and has not been recertified.)

[47] VHA Handbook 1100.19.

[48] VHA Handbook 1100.19.

[49] Office of Safety and Risk Awareness, Office of Quality and Performance, "Provider Competency and Clinical Care Concerns Including: Focused Clinical Care Review and FPPE for Cause Guidance" July 2016 (Revision 2).

[50] VHA Handbook 1100.17, *National Practitioner Data Bank (NPDB) Reports*, December 28, 2009. (This VHA Handbook was scheduled for recertification on or before the last working date of December 2014 and has not been recertified.)

- Five solo/few practitioners[51] hired within 18 months before the site visit[52] or were privileged within the prior 12 months[53]
- Eight LIPs hired within 18 months before the site visit
- Eleven LIPs re-privileged within 12 months before the visit
- Four providers who underwent a FPPE for cause within 12 months prior to the visit.

The OIG evaluated the following performance indicators:

- Privileging
  - Privileges requested by the provider
    - Facility-specific
    - Service-specific
    - Provider-specific[54]
  - Approval of privileges for a period of less than, or equal to, two years
- Focused professional practice evaluations
  - Criteria defined in advance
  - Use of required criteria in FPPEs for selected specialty LIPs
  - Results and timeframes clearly documented
  - Evaluation by another provider with similar training and privileges
  - Medical Staff Executive Committee consideration of FPPE results in its decision to recommend continuing the initially granted privileges
- Ongoing professional practice evaluations
  - Criteria specific to the service or section
  - Use of required criteria in OPPEs for selected specialty LIPs

[51] This refers to circumstances where there are two or less practitioners in a particular specialty.

[52] The 18-month period was from May 26, 2017, through November 26, 2018.

[53] The 12-month review period was from November 26, 2017, through November 26, 2018; VHA Memorandum, *Requirements for Peer Review of Solo Practitioners*, August 29, 2016, refers to a solo practitioner as being one provider in the facility that is privileged in a particular specialty. The OIG considers few practitioners as being less than three providers in the facility that are privileged in a particular specialty.

[54] According to VHA Handbook 1100.19, facility-specific means that privileges are granted only for procedures and types of services performed at the facility; service-specific refers to privileges being granted in a specific clinical service, such as neurology; and provider-specific means that the privileges should be granted to the individual provider based on their clinical competence and capabilities.

  - Service chief's determination to recommend continuation of current privileges was based in part on the results of OPPE activities
  - Evaluation by another provider with similar training and privileges
  - Medical Staff Executive Committee's decision to recommend continuing privileges based on OPPE results
- Focused professional practice evaluations for cause
  - Clearly defined expectations/outcomes
  - Time limited
  - Provider's ability to practice independently not limited for more than 30 days
  - Shared with the provider in advance
- Reporting of privileging actions to National Practitioner Data Bank

Medical Staff Privileging Conclusion

Generally, the facility met requirements with the above performance indicators. The OIG made no recommendations.

Environment of Care

Any facility, regardless of its size or location, faces vulnerabilities in the healthcare environment. VHA requires managers to conduct environment of care inspection rounds and resolve issues in a timely manner. The goal of the environment of care program is to reduce and control environmental hazards and risks; prevent accidents and injuries; and maintain safe conditions for patients, visitors, and staff. The physical environment of a healthcare organization must not only be functional, but should also promote healing.[55]

The purpose of this facet of the OIG inspection was to determine whether the facility maintained a clean and safe healthcare environment in accordance with applicable requirements. The OIG examined whether the facility met requirements in selected areas that are often associated with higher risks of harm to patients, such as in the locked inpatient mental health unit. The inspection team also looked at facility compliance with emergency management processes.[56]

VHA requires its facilities to have the "capacity for [providing] mental health services for veterans with acute and severe emotional and/or behavioral symptoms causing a safety risk to self or others, and/or resulting in severely compromised functional status. This level of care is typically provided in an inpatient setting;" however, for facilities that do not have inpatient mental health services, that "capacity" could mean facilitating care at a nearby VA or non-VA facility.[57]

VHA requires managers to establish a comprehensive emergency management program to ensure the continuity of patient care and hospital operations in the event of a natural disaster or other emergency. This includes conducting a hazard vulnerability analysis and developing an emergency operations plan. These requirements are meant to support facilities' efforts to identify and minimize harm from potential hazards, threats, incidents, and events related to healthcare and other essential services.[58] Managers must also develop utility management plans to increase reliability and reduce failures of electrical power distribution systems in accordance with TJC,[59]

[55] VHA Directive 1608, *Comprehensive Environment of Care (CEOC Program)*, February 1, 2016.

[56] Applicable requirements for high-risk areas and emergency management include those detailed in or by various VHA Directives, Joint Commission hospital accreditation standards, Occupational Safety and Health Administration, American National Standards Institute (ANSI)/Association for the Advancement of Medical Instrumentation (AAMI), and National Fire Protection Association (NFPA).

[57] VHA Handbook 1160.06, *Inpatient Mental Health Services*, September 16, 2013. (This VHA Handbook was scheduled for recertification on or before the last working date of September 2018 and has not been recertified.)

[58] VHA Directive 0320.01, *Veterans Health Administration Comprehensive Emergency Management Program (CEMP) Procedures*, April 6, 2017.

[59] TJC. Environment of Care standard EC.02.05.07.

Occupational Safety and Health Administration,[60] and National Fire Protection Association standards.[61] The provision of sustained electrical power during disasters or emergencies is critical to healthcare facility operations.[62]

In all, the OIG team inspected six inpatient areas—intensive care, CLC one and two, medical/surgical units C1 and C2, inpatient mental health—in addition to the post-anesthesia care unit, the emergency department, and the primary care clinic. The team also inspected the emergency management program and the Marion VA Clinic in Marion, Virginia. The inspection team reviewed relevant documents and interviewed key employees and managers. The OIG evaluated the following location-specific performance indicators:

- Parent facility
  - General safety
  - Environmental cleanliness and infection prevention
  - General privacy
  - Women veterans program
  - Availability of medical equipment and supplies
- Community based outpatient clinic
  - General safety
  - Environmental cleanliness and infection prevention
  - General privacy
  - Women veterans program
  - Availability of medical equipment and supplies
- Locked inpatient mental health unit
  - Mental health environment of care rounds
  - Nursing station security
  - Public area and general unit safety

[60] The Occupational Safety and Health Administration (OSHA) is part of the US Department of Labor. OSHA's Mission is to assure safe and healthy working conditions "by setting and enforcing standards and by providing training, outreach, education, and assistance." https://www.osha.gov/about.html (This website was accessed on June 28, 2018.)

[61] The National Fire Protection Association (NFPA) is a global nonprofit organization "devoted to eliminating death, injury, property, and economic loss due to fire, electrical, and related hazards." https://www.nfpa.org/About-NFPA (This website was accessed on June 28, 2018.)

[62] TJC. Environment of Care standard EC.02.05.07.

  - Patient room safety
  - Infection prevention
  - Availability of medical equipment and supplies
- Emergency management
  - Hazard vulnerability analysis (HVA)
  - Emergency operations plan (EOP)
  - Emergency power testing and availability

Environment of Care Conclusion

Generally, the facility met requirements with the above performance indicators. The OIG did not note any issues with the availability of medical equipment and supplies. The OIG made no recommendations.

Medication Management: Controlled Substances Inspections

The Controlled Substances Act divides controlled drugs into five categories based on whether they have an accepted medical treatment use in the United States, their relative potential for abuse, and the likelihood of causing dependence if abused.[63] Diversion of controlled substances by healthcare workers—the transfer of legally prescribed controlled substances from the prescribed individual to others for illicit use—remains a serious problem that can increase patient safety issues and elevate the liability risk to healthcare facilities.[64]

VHA requires that facility managers implement and maintain a controlled substances inspection program to minimize the risk for loss and diversion and to enhance patient safety. Requirements include the appointment of controlled substances coordinator(s) and controlled substances inspectors, implementation of procedures for inventory control, and inspections of the pharmacy and clinical areas with controlled substances.[65]

To determine whether the facility complied with requirements related to controlled substances security and inspections, the OIG team interviewed key managers and reviewed inspection reports; monthly summaries of findings, including discrepancies, provided to the facility director; inspection quarterly trend reports for the prior two completed quarters;[66] and other relevant documents. The OIG evaluated the following performance indicators:

- Controlled substances coordinator reports
  - Monthly summary of findings to the director
  - Quarterly trend reports to the director
  - Quality Management Committee's review of monthly and quarterly trend reports
  - Actions taken to resolve identified problems
- Pharmacy operations
  - Staff restrictions for monthly review of balance adjustments[67]
- Requirements for controlled substances inspectors

[63] Drug Enforcement Agency Controlled Substance Schedules. https://www.deadiversion.usdoj.gov/schedules/. (The website was accessed on March 7, 2019.)

[64] American Society of Health-System Pharmacists, "ASHP Guidelines on Preventing Diversion of Controlled Substances," *American Journal of Health-System Pharmacists* 74, no. 5 (March 1, 2017): 325-348.

[65] VHA Directive 1108.02(1), *Inspection of Controlled Substances*, November 28, 2016 (amended March 6, 2017).

[66] The two quarters were from April 1, 2018, through September 30, 2018.

[67] Controlled substances balance adjustment reports list transactions in which the pharmacy vault inventory balance was manually adjusted.

  - No conflicts of interest
  - Appointed in writing by the director for a term not to exceed three years
  - Hiatus of one year between any reappointment
  - Completion of required annual competency assessment
- Controlled substances area inspections
  - Completion of monthly inspections
  - Rotations of controlled substances inspectors
  - Patterns of inspections
  - Completion of inspections on day initiated
  - Reconciliation of dispensing between pharmacy and each dispensing area
  - Verification of controlled substances orders
  - Performance of routine controlled substances inspections
- Pharmacy inspections
  - Monthly physical counts of the controlled substances in the pharmacy
  - Completion of inspections on day initiated
  - Security and verification of drugs held for destruction[68]
  - Accountability for all prescription pads in pharmacy
  - Verification of hard copy controlled substances prescriptions
  - Verification of 72-hour inventories of the main vault
  - Quarterly inspections of emergency drugs
  - Monthly checks of locks and verification of lock numbers
- Facility review of override reports[69]

[68] According to VHA Directive 1108.02(1), The Destructions File Holding Report "lists all drugs awaiting local destruction or turn-over to a reverse distributor." Controlled substances inspectors "must verify there is a corresponding sealed evidence bag containing drug(s) for each destruction holding number on the report."

[69] When automated dispensing cabinets are used, nursing staff can override and remove medications prior to the pharmacists' review of medications ordered by the providers.

Medication Management Conclusion

The OIG found general compliance with requirements for most of the performance indicators evaluated for medication management, including the controlled substances coordinator reports, pharmacy operations, and requirements for controlled substances inspectors. However, the OIG identified noncompliance with the completion of inspections on the day initiated, reconciliation of dispensing and return of stock for one random day, and inspection of the emergency drug cache.

Specifically, VHA requires that controlled substances inspectors conduct monthly physical inventory of the controlled substance storage area and complete these inventories on the day it is initiated.[70] The OIG found that controlled substances inspectors routinely conducted monthly controlled substances inspections; however, in two of six months reviewed, the physical inventory of controlled substances was not completed on the day initiated. This resulted in the potential lack of accountability for all controlled substances. The controlled substances coordinator acknowledged lack of attention to detail as the reason for noncompliance.

Recommendation 1

1. The facility director makes certain that controlled substances inspectors complete monthly physical inventories of controlled substance storage areas on the day initiated and monitors the inspectors' compliance.

Facility concurred.

Target date for completion: June 30, 2019

Facility response: Controlled Substance inspection report forms have been revised to include requirement for signing and dating prior to leaving inspection area. Controlled Substance (CS) inspectors will be trained on the use of the forms until 100% are trained. Monthly audits will be conducted by the Controlled Substance Coordinator to ensure compliance and results will be reported to the Quality Executive Board. This will be monitored monthly with 100 percent compliance maintained for six consecutive months.

VHA requires controlled substances program staff to reconcile the restocking/refilling from the pharmacy to every automated dispensing cabinet and the return of stock from every automated dispensing cabinet to the pharmacy for one random day during monthly controlled substances area inspections.[71]

The OIG reviewed six months of facility records and found that one-day reconciliation of restocking/refilling from pharmacy to an automated dispensing cabinet were missed for two of

[70] VHA Directive 1108.02(1).
[71] VHA Directive 1108.02(1).

six months in 8 of 10 controlled substances areas. The OIG also noted the facility had not conducted one-day's return of stock to the pharmacy from every automated dispensing cabinet for three to six months in 9 of 10 areas. Missed reconciliations may cause delays in identifying any potential drug diversion activities. Due to lack of understanding, the controlled substances coordinator did not know the reports needed to conduct this reconciliation process.

Recommendation 2

2. The facility director ensures that controlled substances program staff reconcile the restocking/refilling from the pharmacy to every automated dispensing cabinet for one random day during monthly controlled substances area inspections and monitors controlled substances program staff's compliance.

Facility concurred.

Target date for completion: June 30, 2019

Facility response: The Pharmacy Inspection report will be changed to reflect the need to reconcile stocking/refilling from pharmacy to **every** automated dispensing cabinet. All areas will be reconciled and will be monitored and verified by the Controlled Substance Coordinator (CSC) monthly. The CSC will report results to the Quality Executive Board. This will be monitored until 90 percent compliance is maintained for six consecutive months.

Recommendation 3

3. The facility director ensures that controlled substances program staff reconcile the return of stock from every automated dispensing cabinet to the pharmacy for one random day during monthly controlled substances area inspections and monitors controlled substances program staff's compliance.

Facility concurred.

Target date for completion: June 30, 2019

Facility response: The Pharmacy Inspection report has been changed to reflect the need to reconcile the return of stock from every automated dispensing cabinet to the pharmacy. All areas will be reconciled and will be monitored and verified by the Controlled Substance Coordinator (CSC) monthly. The CSC will report results to the Quality Executive Board. This will be monitored until 90 percent compliance is maintained for six consecutive months.

VHA requires that controlled substances inspectors complete a quarterly physical inventory of the controlled substances in the emergency drug cache by breaking the locks and physically counting all controlled substances. In each of the two months of the quarter in which the physical inventory does not occur, the controlled substances inspectors must check the locks for any

evidence of tampering and verify the lock numbers.[72] The OIG found evidence that controlled substances inspectors did not check the emergency drug cache locks for any evidence of tampering or verify the lock numbers for one of the two months required for each quarter. Failure to perform required inspections delays the replacing of expired controlled substances and compromises the facility's emergency readiness. Requirements were known to controlled substances inspectors, however, controlled substances coordinator was unable to locate documentation for May and August.

Recommendation 4

4. The facility director confirms that controlled substances inspectors complete emergency drug cache inspections and monitors inspectors' compliance.

Facility concurred.

Target date for completion: June 30, 2019

Facility response: The Pharmacy Controlled Substance (CS) Inspection report form was revised to include requirement for the cache seal log book has been timed, dated, signed and all lock numbers documented. All CS Inspectors will be trained on the use of the form until 100% have been trained. Monthly audits will be conducted by the Controlled Substance Coordinator (CSC) verifying all information is documented. The CSC will report the results to the Quality Executive Board. This will be monitored until 100 percent compliance is maintained for six consecutive months.

[72] VHA Directive 1108.02(1).

Mental Health: Military Sexual Trauma Follow-Up and Staff Training

The Department of Veterans Affairs uses the term "military sexual trauma" (MST) to refer to a "psychological trauma, which in the judgment of a mental health professional employed by the Department [of Veterans Affairs], resulted from a physical assault of a sexual nature, battery of a sexual nature, or sexual harassment which occurred while the Veteran was serving on active duty, active duty for training, or inactive duty training."[73] MST is an experience, not a diagnosis or a mental health condition. Although posttraumatic stress disorder is commonly associated with MST, other frequently associated diagnoses include depression and substance use disorders.[74]

VHA requires that the facility director designates an MST coordinator to support national and VISN-level policies related to MST-related care and serve as a source of information; establish and monitor MST-related staff training and informational outreach; and communicate MST-related issues, services, and initiatives with leadership.[75] Additionally, the facility director is responsible for ensuring that MST-related data are tracked and monitored.[76]

VHA requires that all veterans and potentially eligible individuals seen in VHA facilities be screened for experiences of MST with the required MST clinical reminder in the computerized patient record system (CPRS).[77] Those who screen positive must have access to appropriate MST-related care.[78] VHA also requires that evidence-based mental health care be available to all veterans with mental health conditions related to MST. Patients requesting or referred for mental health services must receive an initial evaluation within 24 hours of the referral to identify urgent care needs and a more comprehensive diagnostic evaluation within 30 days.[79]

The MST coordinator may provide clinical care to individuals experiencing MST and is thus subject to the same mandatory training requirements as mental health and primary care providers.[80] All mental health and primary care providers must complete MST mandatory

[73] VHA Directive 1115, *Military Sexual Trauma (MST) Program*, May 8, 2018.

[74] Military Sexual Trauma. https://www.mentalhealth.va.gov/docs/mst_general_factsheet.pdf. (The website was accessed on November 17, 2017.)

[75] VHA Directive 1115.

[76] VHA Handbook 1160.01, *Uniform Mental Health Services in VA Medical Centers and Clinics,* September 11, 2008 (amended November 16, 2015). (This VHA Handbook was scheduled for recertification on or before the last working date of September 2013 and has not been recertified.)

[77] VHA Directive 1115 states that "MST-related care is not subject to the minimum active duty service requirement set forth in 38 U.S.C. 5303A; Veterans may therefore be able to receive MST-related care even if they are not eligible for VA health care under other treatment authorities."

[78] VHA Directive 1115.

[79] VHA Handbook 1160.01.

[80] VHA Directive 1115.

training; for those hired after July 1, 2012, this training must be completed no later than 90 days after assuming their position.[81]

To determine whether the facility complied with the requirements related to MST follow-up and training, the OIG inspection team reviewed relevant documents and staff training records, and interviewed key employees. The team also reviewed the electronic health records of 49 outpatients who had a positive MST screen from July 1, 2017, through June 30, 2018. The OIG evaluated the following performance indicators:

- Designated facility MST coordinator
  - Establishes and monitors MST-related staff training
  - Establishes and monitors informational outreach
  - Communicates MST-related issues, services, and initiatives with local leadership
- Evidence of tracking MST-related data
- Provision of clinical care
  - Referral for MST-related care to patients with positive MST screens
  - Initial evaluation within 24 hours of referral for mental health services
  - Comprehensive diagnostic and treatment planning evaluation within 30 days of referral for mental health services
- Completion of MST mandatory training requirement for mental health and primary care providers

Mental Health Conclusion

Generally, the facility met requirements with the above performance indicators. The OIG made no recommendations.

[81] VHA Directive 1115.01, *Military Sexual Trauma (MST) Mandatory Training and Reporting Requirements for VHA Mental Health and Primary Care Providers*, April 14, 2017; Acting Deputy Under Secretary for Health for Operations and Management Memorandum, *Compliance with Military Sexual Trauma (MST) Mandatory Training for Mental Health and Primary Care Providers,* February 2, 2016.

Geriatric Care: Antidepressant Use among the Elderly

VA's National Registry for Depression reported that "11 [percent] of veterans aged 65 years and older have a diagnosis of major depressive disorder."[82] The VA/DoD Clinical Practice Guideline (CPG) describes depression as "a common mental disorder that presents with depressed mood, loss of interest or pleasure in regular activities, decreased energy, feelings of guilt or low self-worth, disturbed sleep or appetite, and poor concentration." This can lead to poor quality of life, decreased productivity, and increased mortality from suicide.[83]

According to the Centers for Disease Control and Prevention, older adults are at increased risk for experiencing depression because "80 [percent] of older adults have at least one chronic health condition and 50 [percent] have two or more." Further, "most older adults see an improvement in [their] symptoms when treated with antidepression drugs, psychotherapy, or a combination of both."[84]

The American Geriatrics Society revised the Beers Criteria in 2015 to include lists of potentially inappropriate medications to be avoided. Potentially inappropriate medication use in older adults continues to be associated with confusion, falls, and mortality.[85] The criteria provide guidelines that help to improve the safety of prescribing certain medications including antidepressants for older adults.

TJC requires clinicians to educate patients and families about the "safe and effective use of medications."[86] In 2015, VHA outlined essential medical information "necessary for review, management, and communication of medication information" with patients, caregivers, and their healthcare teams.[87] Further, TJC requires clinicians to perform medication reconciliation by comparing the medication a patient is actually taking to the new medications that are ordered for the patient and resolving any discrepancies.[88] The CPG recommends that clinicians monitor patients monthly after therapy initiation or a change in treatment until the patient achieves

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[82] Hans Peterson, "Late Life Depression," *U.S. Department of Veterans Affairs*, Mental Health Featured Article, March 1, 2011. https://www.mentalhealth.va.gov/featureArticle_Mar11LateLife.asp. (The website was accessed on March 8, 2019.)

[83] VA/DoD *Clinical Practice Guideline for the Management of Major Depressive Disorder*, April 2016. https://www.healthquality.va.gov/guidelines/MH/mdd/VADoDMDDCPGFINAL82916.pdf (The website was accessed November 20, 2018.)

[84] Centers for Disease Control and Prevention, "Depression is Not a Normal Part of Growing Older," January 31, 2017. https://www.cdc.gov/aging/mentalhealth/depression.htm. (The website was accessed on March 8, 2019.)

[85] American Geriatrics Society 2015 Beers Criteria Update Expert Panel, "American Geriatrics Society 2015 Updated Beers Criteria for Potentially Inappropriate Medication Use in Older Adults." http://www.sigot.org/allegato_docs/1057_Beers-Criteria.pdf (The website was accessed on March 22, 2018.)

[86] TJC. Provision of Care, Treatment, and Services standard PC 02.03.01.

[87] VHA Directive 1164, *Essential Medication Information Standards*, June 26, 2015.

[88] TJC. National Patient Safety Goal standard NPSG.03.06.01.

remission. Monitoring includes assessment of symptoms, adherence to medication and psychotherapy, and any adverse effects. The CPG also recommends that treatment planning includes patient education about treatment options, including risks and benefits.[89]

To determine whether the facility complied with requirements concerning use of antidepressants among the elderly, the OIG interviewed key employees and managers. The team also reviewed the electronic health records of 40 randomly selected patients, ages 65 and older, who were newly prescribed one of seven selected antidepressant medications from July 1, 2017, through June 30, 2018.[90] The OIG evaluated the following performance indicators:

- Justification for medication initiation
- Evidence of patient and/or caregiver education specific to the medication prescribed
- Clinician evaluation of patient and/or caregiver understanding of the education provided
- Medication reconciliation

Geriatric Care Conclusion

The OIG found clinicians documented reasons for prescribing medications, evaluated patient and/or caregiver understanding when education was provided related to newly prescribed medications, and performed medication reconciliation to minimize duplicative medications and adverse interactions. However, the OIG identified inadequate patient and/or caregiver education related to newly prescribed medications.

TJC requires that clinicians educate patients and families about safe and effective use of medications and that the patient's medical record contains information that reflects the patient's care, treatment, and services.[91] The OIG estimated that clinicians provided this education to 73 percent of the patients at the facility, based on electronic health records reviewed.[92] This resulted in patients/caregivers not having the necessary information to successfully manage their healthcare issues. The chief of Geriatrics and Extended Care stated that the current template used by providers did not have all the necessary elements and providers are not consistently documenting education provided.

[89] VA/DoD Clinical Practice Guidelines for the Management of Major Depressive Disorder.

[90] The seven selected antidepressant medications are Amitriptyline, Clomipramine, Desipramine, Doxepin (>6mg/day), Imipramine, Nortriptyline, and Paroxetine.

[91] TJC. Medication Management standard PC.02.03.01, EP10.

[92] The OIG is 95 percent confident that the true compliance rate is somewhere between 58.1 and 85.7 percent, which is statistically significantly below the 90 percent benchmark.

Recommendation 5

5. The chief of staff makes certain that clinicians provide and document patient/caregiver education specific to the newly prescribed medication and monitors clinicians' compliance.

Facility concurred.

Target date for completion: June 30, 2019

Facility response: Pharmacy will develop and mail a letter to all patients over 65 currently taking Tricyclic Antidepressants (TCA) or Paroxetine which provides patient/caregiver education related to that medication. The letter will be automatically generated at the time the TCA or Paroxetine is prescribed for newly prescribed patients. A CPRS ordering note for all TCA/Paroxetine will be utilized ("TRICYCLIC/PAROXETINE NOTE (B)" progress note). The new template will prompt education and the following information will be displayed as part of the medical record: "The patient and caregiver were counseled about potential side effects or medication including but not limited to dry mouth, constipation, dizziness on standing, blurred vision, drowsiness, appetite changes, irregular heartbeat. He/she indicated understanding and was given an opportunity to ask questions." This education will be provided during the patient visit by the provider as it is recorded in CPRS. Education will be provided to the providers on the use of this note for ordering TCA/Paroxetine. This will be monitored until training is complete for 100% of the providers and the letters are mailed to 100% of patients currently prescribed TCA/Paroxetine. Results of monthly audits ensuring training is noted will be conducted by pharmacy chief or designee until 100 percent compliance is maintained for six consecutive months. The results will be reported to the Pharmacy & Therapeutics Committee.

Women's Health: Abnormal Cervical Pathology Results Notification and Follow-Up

Each year, about 12,000 women in the United States are diagnosed with cervical cancer.[93] Human papillomavirus (HPV) can be transmitted during sexual contact and is the main cause of cervical cancer.[94] In addition to HPV infection, other risk factors for cervical cancer include smoking, human immunodeficiency virus (HIV) infection, use of oral contraceptives for five or more years, and having given birth to three or more children.[95] Cervical cancer is highly preventable through diligent screening and vaccination efforts. With early detection, it is very treatable and associated with optimal patient outcomes.[96]

VA is authorized to provide "gender-specific services, such as Papanicolaou tests (Pap smears)," to eligible women veterans. Further, VHA requires that all eligible and enrolled women veterans have access to appropriate services and preventative care. That care would include age-appropriate screening for cervical cancer.[97]

VHA requires that each facility have a "full-time women veterans program manager (WVPM) to execute comprehensive planning for women's health care." VHA also requires a medical director or clinical champion to be responsible for the clinical oversight of the women's health program. Each facility must also have a "Women Veterans Health Committee (WVHC) comprised of appropriate facility leadership and program directors, which develops and implements a Women's Health Program strategic plan." The Women Veterans Health Committee must meet at least quarterly and report to the executive leadership. The facility must also have a process to ensure the collecting and tracking of data related to cervical cancer screenings.[98]

VHA has established timeframes for notifying patients of abnormal cervical pathology results. Abnormal cervical pathology results must be communicated to patients within seven calendar days from the date the results are available to the ordering provider. Communication of the

[93] Centers for Disease Control and Prevention. "Cervical Cancer" *Inside Knowledge* fact sheet, December 2016. https://www.cdc.gov/cancer/cervical/pdf/cervical_facts.pdf. (The website was accessed on February 28, 2018.)

[94] Center for Disease Control and Prevention. *Basic Information About Cervical Cancer*. February 13, 2017. https://www.cdc.gov/cancer/cervical/basic_info/index.htm. (The website was accessed on March 8, 2019.)

[95] Centers for Disease Control and Prevention. *What Are the Risk Factors for Cervical Cancer?* February 13, 2017. https://www.cdc.gov/cancer/cervical/basic_info/risk_factors.htm. (The website was accessed on March 8, 2019.)

[96] Center for Disease Control and Prevention. *Basic Information About Cervical Cancer*. February 13, 2017. https://www.cdc.gov/cancer/cervical/basic_info/index.htm. (The website was accessed on March 8, 2019.)

[97] VHA Directive 1330.01(2), *Health Care Services for Women Veterans,* February 15, 2017 (amended July 24, 2018).

[98] VHA Directive 1330.01(2).

results to patients must be documented. The facility must ensure that appropriate follow-up care is provided to patients with abnormal results.[99]

To determine whether the facility complied with selected VHA requirements for the notification and follow-up care of abnormal cervical pathology results, the OIG inspection team reviewed relevant documents and interviewed selected employees and managers. The team also reviewed the electronic health records of 33 women veteran patients, between ages 21 and 65, who had an abnormal pap smear or test from July 1, 2017, through June 30, 2018. The OIG evaluated the following performance indicators:

- Appointment of a women veterans program manager
- Appointment of a women's health medical director or clinical champion
- Facility Women Veterans Health Committee
  - Core membership
  - Quarterly meetings
  - Reports to clinical executive leadership
- Collection and tracking of cervical cancer screening data
  - Notification of patients due for screening
  - Completed screenings
  - Results reporting
  - Follow-up care
- Communication of abnormal results to patients within required timeframe
- Provision of follow-up care for abnormal cervical pathology results, if indicated

Women's Health Conclusion

Generally, the facility met requirements with the above performance indicators. The OIG made no recommendations.

[99] VHA Directive 1330.01(2).

High-Risk Processes: Operations and Management of Emergency Departments and Urgent Care Centers

VHA defines an emergency department as a "unit in a VA medical facility that has acute care medical and/or surgical inpatient beds and whose primary responsibility is to provide resuscitative therapy and stabilization in life-threatening situations." An urgent care center (UCC) "provides acute medical care for patients without a scheduled appointment who are in need of immediate attention for an acute medical or mental health illness and/or minor injuries."[100] A variety of emergency services may exist, dependent on "capability, capacity, and function of the local VA medical facility;" however, emergency care must be uniformly available in all VHA emergency departments and UCCs.[101]

Because the emergency department or UCC is often the first point of contact for patients seeking treatment of unexpected medical issues, a care delivery system with appropriate resources and services must be available to deliver prompt, safe, and appropriate care. VHA requires that each emergency department provide "unrestricted access to appropriate and timely emergency medical and nursing care 24 hours a day, 7 days a week." VHA UCCs are also required to provide access and timely care during established operational hours. VHA also requires that "evaluation, management, and treatment [are] provided by qualified personnel with the knowledge and skills appropriate to treat those seeking emergency care."[102]

TJC noted that patient flow problems pose a persistent risk to quality and safety and established standards for the management of the flow of patients in the emergency department and the rest of the hospital. Managing the flow of patients prevents overcrowding, which can "undermine the timeliness of care and, ultimately, patient safety." Effective management processes that "support patient flow [in the ED or UCC settings] (such as admitting, assessment and treatment, patient transfer, and discharge) can minimize delays in the delivery of care."[103]

The VHA national director of Emergency Medicine developed the Emergency Medicine Improvement (EMI) initiative to improve the quality of emergent and urgent care provided through VA emergency departments and UCCs. As part of this initiative, all VA emergency departments and UCCs must use the Emergency Department Integration Software (EDIS) tracking program to document and manage the flow of patients.[104]

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[100] VHA Directive 1101.05(2), *Emergency Medicine*, September 2, 2016 (amended March 7, 2017).

[101] VHA Directive 1101.05(2).

[102] VHA Directive 1101.05(2).

[103] TJC. Leadership standard LD.04.03.11.

[104] VHA Directive 1101.05(2); The Emergency Medicine Management Tool (EMMT) uses data collected from EDIS to generate productivity metrics. The use of EDIS and EMMT are key tools in accomplishing EMI initiative goals.

VA emergency departments and UCCs must also be designed to promote a safe environment of care.[105] Managers must ensure medications are securely stored,[106] a psychiatric intervention room is available,[107] and equipment and supplies are readily accessible to provide gynecologic and resuscitation services. VHA also requires emergency departments to have communication systems available to accept requests by local emergency medical services for transporting medically and psychiatrically unstable patients to VA emergency departments.[108]

The OIG examined the clinical risks of the emergency department/UCC areas by evaluating the staffing; the provision of care, including selected aspects of mental health and women's health; and the reduction of patient safety risks to optimize quality care and outcomes in those areas. In addition to conducting manager and staff interviews, the OIG team reviewed emergency department staffing schedules, committee minutes, and other relevant documents. The OIG evaluated the following performance indicators:

- General
  - Presence of an emergency department or UCC
  - Availability of acute care medical and/or surgical inpatient beds in facilities with emergency departments
  - Emergency department/UCC operating hours
  - Workload capture process
- Staffing for emergency department/UCC
  - Dedicated medical director
  - At least one licensed physician privileged to staff at all times
  - Minimum of two registered nurses on duty during all hours of operation
  - Backup call schedules for providers
- Support services for emergency department/UCC
  - Access during regular hours, off hours, weekends, and holidays
  - On-call list for staff required to respond

[105] VHA Directive 1101.05(2).

[106] TJC. Medication Management standard MM.03.01.01.

[107] A psychiatric intervention room is where individuals experiencing a behavioral health crisis, including serious disturbances, agitation, or intoxication may be taken immediately on arrival.

[108] VHA Directive 1101.05(2).

  - Licensed independent mental health provider available as required for the facility's complexity level
  - Telephone message system during non-operational hours
  - Inpatient provider available for patients requiring admission
- Patient flow
  - EDIS tracking program
  - Emergency department patient flow evaluation
  - Diversion policy
  - Designated bed flow coordinator
- General safety
  - Directional signage to after-hours emergency care
  - Fast tracks[109]
- Medication security and labeling
- Management of patients with mental health disorders
- Emergency department participation in local/regional emergency medical services (EMS) system, if applicable
- Women veteran services
  - Capability and equipment for gynecologic examinations
- Life support equipment

High-Risk Processes Conclusion

Generally, the facility met requirements with the above performance indicators. The OIG made no recommendations.

[109] The emergency department fast track is a designated care area within the emergency department domain where lower acuity patients are assessed and treated.

Appendix A: Summary Table of Comprehensive Healthcare Inspection Findings

The intent is for facility leaders to use these recommendations as a road map to help improve operations and clinical care. The recommendations address systems issues as well as other less-critical findings that, if left unattended, may potentially interfere with the delivery of quality health care.

Healthcare Processes	Performance Indicators	Conclusion
Leadership and Organizational Risks	• Executive leadership position stability and engagement • Employee satisfaction • Patient experience • Accreditation and/or for-cause surveys and oversight inspections • Factors related to possible lapses in care • VHA performance data	Five OIG recommendations, ranging from documentation concerns to noncompliance that can lead to patient and staff safety issues or adverse events, are attributable to the director and chief of staff. See details below.

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Quality, Safety, and Value	• Protected peer reviews • UM reviews • Patient safety • Resuscitation episode review	• None	• None
Medical Staff Privileging	• Privileging • FPPEs • OPPEs • FPPEs for cause • Reporting of privileging actions to National Practitioner Data Bank	• None	• None

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement

Environment of Care	• Parent facility
	  ○ General safety
	  ○ Environmental cleanliness and infection prevention
	  ○ General privacy
	  ○ Women veterans program
	  ○ Availability of medical equipment and supplies
	• Community based outpatient clinic
	  ○ General safety
	  ○ Environmental cleanliness and infection prevention
	  ○ General privacy
	  ○ Women veterans program
	  ○ Availability of medical equipment and supplies
	• Locked inpatient mental health unit
	  ○ Mental health environment of care rounds
	  ○ Nursing station security
	  ○ Public area and general unit safety
	  ○ Patient room safety
	  ○ Infection prevention
	  ○ Availability of medical equipment and supplies
	• Emergency management
	  ○ Hazard vulnerability analysis (HVA)
	  ○ Emergency operations plan (EOP)
	  ○ Emergency power testing and availability
		• None	• None

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
Medication Management: Controlled Substances Inspections	• Controlled substances coordinator reports • Pharmacy operations • Controlled substances inspector requirements • Controlled substances area inspections • Pharmacy inspections • Facility review of override reports	• None	• Controlled substance inspectors complete monthly physical inventories of controlled substance storage areas on the day initiated. • Controlled substances program staff reconcile the restocking/refilling from the pharmacy to every automated dispensing cabinet for one random day during monthly controlled substances area inspections. • Controlled substances program staff reconcile the return of stock from every automated dispensing cabinet to the pharmacy for one random day during monthly controlled substances area inspections. • Controlled substances inspectors complete emergency drug cache inspections.
Mental Health: Military Sexual Trauma (MST) Follow-Up and Staff Training	• Designated facility MST coordinator • Evidence of tracking MST-related data • Provision of clinical care • Completion of MST mandatory training requirement for mental health and primary care providers	• None	• None
Geriatric Care: Antidepressant Use among the Elderly	• Justification for medication initiation • Evidence of patient and/or caregiver	• None	• Clinicians provide and document patient/caregiver education specific to

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
	education specific to the medication prescribed • Clinician evaluation of patient and/or caregiver understanding of the education provided • Medication reconciliation		the newly prescribed medication.
Women's Health: Abnormal Cervical Pathology Results Notification and Follow-Up	• Appointment of a women veterans program manager • Appointment of a women's health medical director or clinical champion • Facility Women Veterans Health Committee • Collection and tracking of cervical cancer screening data • Communication of abnormal results to patients within required timeframe • Provision of follow-up care for abnormal cervical pathology results, if indicated	• None	• None
High-Risk Processes: Operations and Management of Emergency Departments and UCCs	• General • Staffing for emergency department/UCC • Support services for ED/UCC • Patient flow • General safety • Medication security and labeling • Management of patients with mental health disorders • Emergency department participation in local/regional EMS system • Women veteran services	• None	• None

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
	• Life support equipment		

Appendix B: Facility Profile and VA Outpatient Clinic Profiles

Facility Profile

The table below provides general background information for this mid-high complexity (1c) affiliated[110] facility reporting to VISN 9.[111]

Table B.1. Facility Profile for James H. Quillen VA Medical Center (621) (October 1, 2015, through September 30, 2018)

Profile Element	Facility Data FY 2016[112]	Facility Data FY 2017[113]	Facility Data FY 2018[114]
Total medical care budget dollars	$441,144,169	$450,513,018	$483,020,546
Number of:			
• Unique patients	57,674	58,989	59,958
• Outpatient visits	699,173	703,004	733,604
• Unique employees[115]	2,055	2,117	2,137
Type and number of operating beds:			
• Community living center	120	120	120
• Domiciliary	150	150	150
• Medicine	56	56	56
• Mental health	24	24	24
• Surgery	16	16	16
Average daily census:			
• Community living center	68	70	68
• Domiciliary	99	95	87
• Medicine	54	50	45
• Mental health	19	20	18

[110] Associated with a medical residency program.

[111] The VHA medical centers are classified according to a facility complexity model; 1c designation indicates a facility with medium high volume, medium-risk patients, some complex clinical programs, and medium-sized research and teaching programs.

[112] October 1, 2015, through September 30, 2016.

[113] October 1, 2016, through September 30, 2017.

[114] October 1, 2017, through September 30, 2018.

[115] Unique employees involved in direct medical care (cost center 8200).

Profile Element	Facility Data FY 2016[112]	Facility Data FY 2017[113]	Facility Data FY 2018[114]
• Surgery	7	6	7

Source: VA Office of Academic Affiliations, VHA Support Service Center, and VA Corporate Data Warehouse
Note: The OIG did not assess VA's data for accuracy or completeness.

VA Outpatient Clinic Profiles[116]

The VA outpatient clinics in communities within the catchment area of the facility provide primary care integrated with women's health, mental health, and telehealth services. Some also provide specialty care, diagnostic, and ancillary services. Table B.2. provides information relative to each of the clinics.

Table B.2. VA Outpatient Clinic Workload/Encounters and Specialty Care, Diagnostic, and Ancillary Services Provided (October 1, 2017, through September 30, 2018)[117]

Location	Station No.	Primary Care Workload/ Encounters	Mental Health Workload/ Encounters	Specialty Care Services[118] Provided	Diagnostic Services[119] Provided	Ancillary Services[120] Provided
Bristol, VA	621GJ	8,633	3,236	Endocrinology Dermatology Gastroenterology Anesthesia	n/a	Pharmacy Social work Weight management Nutrition
Jonesville, VA	621QA	1,752	n/a	n/a	n/a	n/a

[116] Includes all outpatient clinics in the community that were in operation as of August 15, 2018. The OIG omitted Knoxville, TN (621QE), as no workload/encounters or services were reported.

[117] The definition of an "encounter" can be found in VHA Directive 2010-049, *Encounter and Workload Capture for Therapeutic and Supported Employment Services Vocational Programs*, October 14, 2010. (This directive expired on October 31, 2015, and has not been updated.) An encounter is a "professional contact between a patient and a practitioner vested with responsibility for diagnosing, evaluating, and treating the patient's condition."

[118] Specialty care services refer to non-primary care and non-mental health services provided by a physician.

[119] Diagnostic services include electrocardiogram (EKG), electromyography (EMG), laboratory, nuclear medicine, radiology, and vascular lab services.

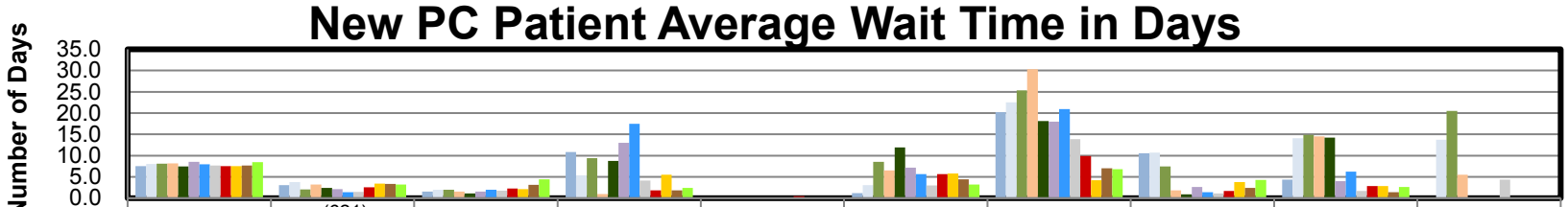
[120] Ancillary services include chiropractic, dental, nutrition, pharmacy, prosthetic, social work, and weight management services.

Location	Station No.	Primary Care Workload/ Encounters	Mental Health Workload/ Encounters	Specialty Care Services[118] Provided	Diagnostic Services[119] Provided	Ancillary Services[120] Provided
Knoxville, TN	621BY	40,672	21,282	Cardiology Dermatology Gastroenterology Infectious disease Nephrology Rheumatology Poly-trauma Anesthesia Eye General surgery GYN	Laboratory & pathology Nuclear medicine	Nutrition Pharmacy Social work Weight management
Knoxville, TN	621QD	n/a	1,003	n/a	n/a	n/a
Lafollette, TN	621GK	4,611	1,469	Endocrinology Dermatology Gastroenterology Poly-trauma Anesthesia General surgery	n/a	Pharmacy Weight management Nutrition
Marion, VA	621QB	1,350	n/a	n/a	n/a	n/a
Morristown, TN	621GG	8,452	1,526	Dermatology Endocrinology Gastroenterology Pulmonary/ Respiratory disease Anesthesia	n/a	Pharmacy Weight management Nutrition

Location	Station No.	Primary Care Workload/ Encounters	Mental Health Workload/ Encounters	Specialty Care Services[118] Provided	Diagnostic Services[119] Provided	Ancillary Services[120] Provided
Norton, VA	621GC	7,268	1,883	Dermatology Endocrinology Gastroenterology Anesthesia	n/a	Pharmacy Weight management Nutrition
Rogersville, TN	621GA	5,388	360	Dermatology Endocrinology Gastroenterology Anesthesia	n/a	Pharmacy Weight management Nutrition
Sevierville, TN	621GI	11,290	5,132	Cardiology Dermatology Endocrinology Poly-trauma Gastroenterology Infectious disease Pulmonary/ Respiratory disease Anesthesia GYN General surgery	n/a	Pharmacy Weight Management Nutrition
Vansant, VA	621QC	915	n/a	n/a	n/a	n/a

Source: VHA Support Service Center and VA Corporate Data Warehouse
Note: The OIG did not assess VA's data for accuracy or completeness.
n/a = not applicable

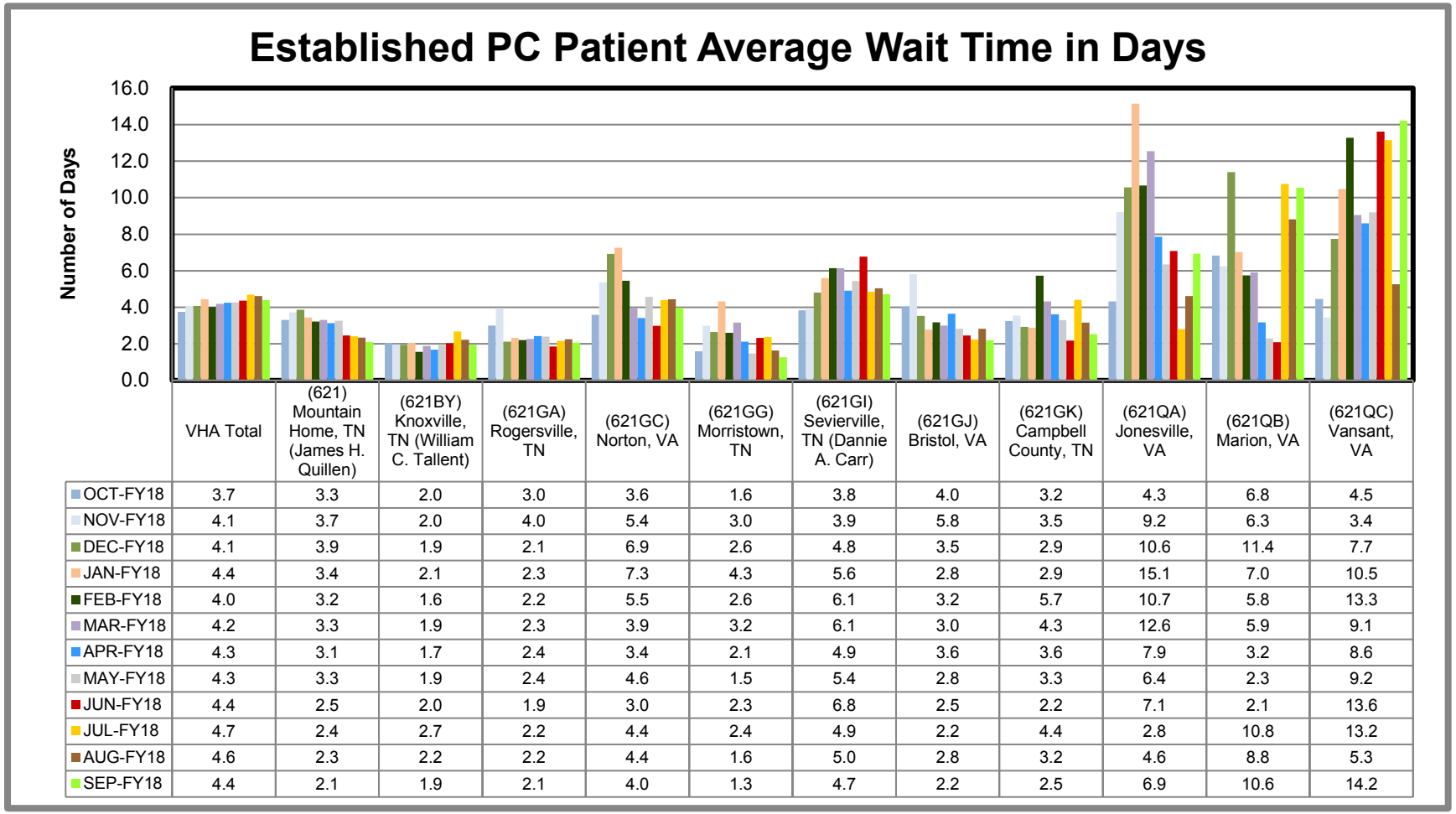
Appendix C: Patient Aligned Care Team Compass Metrics[121]



	VHA Total	(621) Mountain Home, TN (James H. Quillen)	(621BY) Knoxville, TN (William C. Tallent)	(621GA) Rogersville, TN	(621GC) Norton, VA	(621GG) Morristown, TN	(621GI) Sevierville, TN (Dannie A. Carr)	(621GJ) Bristol, VA	(621GK) Campbell County, TN	(621QB) Marion, VA
OCT-FY18	7.5	3.0	1.6	10.8	0.0	1.2	20.3	10.6	4.4	0.0
NOV-FY18	8.0	3.8	2.0	5.4	0.0	3.1	22.5	10.7	14.1	13.8
DEC-FY18	8.1	2.0	2.0	9.4	0.0	8.5	25.3	7.5	14.9	20.5
JAN-FY18	8.2	3.2	1.6	1.0	0.0	6.5	30.3	1.8	14.5	5.5
FEB-FY18	7.5	2.4	1.1	8.8	0.0	11.9	18.2	0.9	14.2	0.0
MAR-FY18	8.6	2.2	1.5	13.0	0.0	7.2	18.0	2.6	4.0	0.0
APR-FY18	7.9	1.4	2.0	17.5	0.0	5.7	21.0	1.4	6.2	0.0
MAY-FY18	7.7	1.5	1.8	4.2	0.0	3.0	13.9	1.1	1.7	4.3
JUN-FY18	7.6	2.5	2.2	1.9	0.5	5.7	9.9	1.7	2.9	0.0
JUL-FY18	7.5	3.4	2.1	5.5	0.1	5.8	4.2	3.8	2.8	0.0
AUG-FY18	7.7	3.4	3.1	1.8	0.0	4.4	7.0	2.4	1.4	0.0
SEP-FY18	8.5	3.2	4.4	2.4	0.1	3.2	6.8	4.3	2.7	0.0

Source: VHA Support Service Center
Note: The OIG did not assess VA's data for accuracy or completeness. The OIG omitted Jonesville, VA (621QA); Vansant, VA (621QC); and Downtown West, TN (621QE), as no data was reported.
Data Definition: "The average number of calendar days between a new patient's primary care 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.

[121] Department of Veterans Affairs, Patient Aligned Care Teams Compass Data Definitions, accessed September 13, 2018.



	VHA Total	(621) Mountain Home, TN (James H. Quillen)	(621BY) Knoxville, TN (William C. Tallent)	(621GA) Rogersville, TN	(621GC) Norton, VA	(621GG) Morristown, TN	(621GI) Sevierville, TN (Dannie A. Carr)	(621GJ) Bristol, VA	(621GK) Campbell County, TN	(621QA) Jonesville, VA	(621QB) Marion, VA	(621QC) Vansant, VA
OCT-FY18	3.7	3.3	2.0	3.0	3.6	1.6	3.8	4.0	3.2	4.3	6.8	4.5
NOV-FY18	4.1	3.7	2.0	4.0	5.4	3.0	3.9	5.8	3.5	9.2	6.3	3.4
DEC-FY18	4.1	3.9	1.9	2.1	6.9	2.6	4.8	3.5	2.9	10.6	11.4	7.7
JAN-FY18	4.4	3.4	2.1	2.3	7.3	4.3	5.6	2.8	2.9	15.1	7.0	10.5
FEB-FY18	4.0	3.2	1.6	2.2	5.5	2.6	6.1	3.2	5.7	10.7	5.8	13.3
MAR-FY18	4.2	3.3	1.9	2.3	3.9	3.2	6.1	3.0	4.3	12.6	5.9	9.1
APR-FY18	4.3	3.1	1.7	2.4	3.4	2.1	4.9	3.6	3.6	7.9	3.2	8.6
MAY-FY18	4.3	3.3	1.9	2.4	4.6	1.5	5.4	2.8	3.3	6.4	2.3	9.2
JUN-FY18	4.4	2.5	2.0	1.9	3.0	2.3	6.8	2.5	2.2	7.1	2.1	13.6
JUL-FY18	4.7	2.4	2.7	2.2	4.4	2.4	4.9	2.2	4.4	2.8	10.8	13.2
AUG-FY18	4.6	2.3	2.2	2.2	4.4	1.6	5.0	2.8	3.2	4.6	8.8	5.3
SEP-FY18	4.4	2.1	1.9	2.1	4.0	1.3	4.7	2.2	2.5	6.9	10.6	14.2

Source: VHA Support Service Center
Note: The OIG did not assess VA's data for accuracy or completeness. The OIG omitted Downtown West, TN (621QE), as no data was reported.
Data Definition: "The average number of calendar days between an established patient's primary care 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."

Appendix D: Strategic Analytics for Improvement and Learning (SAIL) Metric Definitions[122]

Measure	Definition	Desired Direction
ACSC hospitalization	Ambulatory care sensitive conditions hospitalizations	A lower value is better than a higher value
Adjusted LOS	Acute care risk adjusted length of stay	A lower value is better than a higher value
Admit reviews met	% Acute admission reviews that meet interqual criteria	A higher value is better than a lower value
APP capacity	Advanced practice provider capacity	A lower value is better than a higher value
Best place to work	All employee survey best places to work score	A higher value is better than a lower value
Call responsiveness	Call center speed in picking up calls and telephone abandonment rate	A lower value is better than a higher value
Care transition	Care transition (Inpatient)	A higher value is better than a lower value
Complications	Acute care risk adjusted complication ratio (observed to expected ratio)	A lower value is better than a higher value
Comprehensiveness	Comprehensiveness (PCMH)	A higher value is better than a lower value
Cont stay reviews met	% Acute continued stay reviews that meet interqual criteria	A higher value is better than a lower value
Efficiency	Overall efficiency measured as 1 divided by SFA (Stochastic Frontier Analysis)	A higher value is better than a lower value
Efficiency/capacity	Efficiency and physician capacity	A higher value is better than a lower value
Employee satisfaction	Overall satisfaction with job	A higher value is better than a lower value

[122] VHA Support Service Center (VSSC), *Strategic Analytics for Improvement and Learning (SAIL)* (last updated December 26, 2018). http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=8938. (The website was accessed on March 7, 2019, but is not accessible by the public.)

Measure	Definition	Desired Direction
HC assoc infections	Health care associated infections	A lower value is better than a higher value
HEDIS like	Outpatient performance measure (HEDIS)	A higher value is better than a lower value
HEDIS like – HED90_1	HEDIS-EPRP based PRV TOB BHS	A higher value is better than a lower value
HEDIS like – HED90_ec	HEDIS-eOM based DM IHD	A higher value is better than a lower value
MH wait time	Mental health care wait time for new patient completed appointments within 30 days of preferred date	A higher value is better than a lower value
MH continuity care	Mental health continuity of care (FY14Q3 and later)	A higher value is better than a lower value
MH exp of care	Mental health experience of care (FY14Q3 and later)	A higher value is better than a lower value
MH popu coverage	Mental health population coverage (FY14Q3 and later)	A higher value is better than a lower value
Oryx	ORYX	A higher value is better than a lower value
PC routine care appt	Timeliness in getting a PC routine care appointment (PCMH)	A higher value is better than a lower value
PC urgent care appt	Timeliness in getting a PC urgent care appointment (PCMH)	A higher value is better than a lower value
PCMH care coordination	PCMH care coordination	A higher value is better than a lower value
PCMH same day appt	Days waited for appointment when needed care right away (PCMH)	A higher value is better than a lower value
PCMH survey access	Timely appointment, care and information (PCMH)	A higher value is better than a lower value
Physician capacity	Physician capacity	A lower value is better than a higher value
PC wait time	PC wait time for new patient completed appointments within 30 days of preferred date	A higher value is better than a lower value
PSI	Patient safety indicator (observed to expected ratio)	A lower value is better than a higher value

Measure	Definition	Desired Direction
Rating hospital	Overall rating of hospital stay (inpatient only)	A higher value is better than a lower value
Rating PC provider	Rating of PC providers (PCMH)	A higher value is better than a lower value
Rating SC provider	Rating of specialty care providers (specialty care)	A higher value is better than a lower value
RN turnover	Registered nurse turnover rate	A lower value is better than a higher value
RSMR-AMI	30-day risk standardized mortality rate for acute myocardial infarction	A lower value is better than a higher value
RSMR-CHF	30-day risk standardized mortality rate for congestive heart failure	A lower value is better than a higher value
RSMR-COPD	30-day risk standardized mortality rate for COPD	A lower value is better than a higher value
RSMR-pneumonia	30-day risk standardized mortality rate for pneumonia	A lower value is better than a higher value
RSRR-AMI	30-day risk standardized readmission rate for acute myocardial infarction	A lower value is better than a higher value
RSRR-cardio	30-day risk standardized readmission rate for cardiorespiratory patient cohort	A lower value is better than a higher value
RSRR-CHF	30-day risk standardized readmission rate for congestive heart failure	A lower value is better than a higher value
RSRR-COPD	30-day risk standardized readmission rate for COPD	A lower value is better than a higher value
RSRR-CV	30-day risk standardized readmission rate for cardiovascular patient cohort	A lower value is better than a higher value
RSRR-HWR	Hospital wide readmission	A lower value is better than a higher value
RSRR-med	30-day risk standardized readmission rate for medicine patient cohort	A lower value is better than a higher value
RSRR-neuro	30-day risk standardized readmission rate for neurology patient cohort	A lower value is better than a higher value
RSRR-pneumonia	30-day risk standardized readmission rate for pneumonia	A lower value is better than a higher value
RSRR-surg	30-day risk standardized readmission rate for surgery patient cohort	A lower value is better than a higher value

Measure	Definition	Desired Direction
SC care coordination	SC care coordination	A higher value is better than a lower value
SC routine care appt	Timeliness in getting a SC routine care appointment (specialty care)	A higher value is better than a lower value
SC survey access	Timely appointment, care and information (specialty care)	A higher value is better than a lower value
SC urgent care appt	Timeliness in getting a SC urgent care appointment (specialty care)	A higher value is better than a lower value
Seconds pick up calls	Average speed of call center responded to calls in seconds	A lower value is better than a higher value
SMR	Acute care in-hospital standardized mortality ratio	A lower value is better than a higher value
SMR30	Acute care 30-day standardized mortality ratio	A lower value is better than a higher value
Specialty care wait time	Specialty care wait time for new patient completed appointments within 30 days of preferred date	A higher value is better than a lower value
Stress discussed	Stress discussed (PCMH Q40)	A higher value is better than a lower value
Telephone abandonment rate	Telephone abandonment rate	A lower value is better than a higher value

Source: VHA Support Service Center

Appendix E: Strategic Analytics for Improvement and Learning (SAIL) Community Living Center (CLC) Measure Definitions[123]

Measure	Definition
Ability to move independently worsened (LS)	Long-stay measure: percentage of residents whose ability to move independently worsened.
Catheter in bladder (LS)	Long-stay measure: percent of residents who have/had a catheter inserted and left in their bladder.
Falls with major injury (LS)	Long-stay measure: percent of residents experiencing one or more falls with major injury.
Help with ADL (LS)	Long-stay measure: percent of residents whose need for help with activities of daily living has increased.
High risk PU (LS)	Long-stay measure: percent of high-risk residents with pressure ulcers.
Improvement in function (SS)	Short-stay measure: percentage of residents whose physical function improves from admission to discharge.
Moderate-severe pain (LS)	Long-stay measure: percent of residents who self-report moderate to severe pain.
Moderate-severe pain (SS)	Short-stay measure: percent of residents who self-report moderate to severe pain.
New or worse PU (SS)	Short-stay measure: percent of residents with pressure ulcers that are new or worsened.
Newly received antipsych meds (SS)	Short-stay measure: percent of residents who newly received an antipsychotic medication.
Physical restraints (LS)	Long-stay measure: percent of residents who were physically restrained.
Receive antipsych meds (LS)	Long-stay measure: percent of residents who received an antipsychotic medication.
UTI (LS)	Long-stay measure: percent of residents with a urinary tract infection.

[123] *Strategic Analytics for Improvement and Learning (SAIL) for Community Living Centers (CLC)*, Center for Innovation & Analytics (last updated November 19, 2018). http://vaww.vssc.med.va.gov/VSSCEnhancedProductManagement/DisplayDocument.aspx?DocumentID=7410. (The website was accessed on March 6, 2019, but is not accessible by the public.)

Appendix F: VISN Director Comments

Department of Veterans Affairs Memorandum

Date: June 5, 2019

From: Director, VA MidSouth Healthcare Network (10N9)

Subj: Comprehensive Healthcare Inspection of the James H. Quillen VA Medical Center, Mountain Home, TN

To: Director, Chicago Office of Healthcare Inspections (54CH02)

Director, GAO/OIG Accountability Liaison (VHA 10EG GOAL Action)

I concur with the findings and recommendations of this Office of Inspector General Comprehensive Healthcare Inspection Review of the James H. Quillen VA Medical Center, Mountain Home, Tennessee, as well as the action plan developed by the facility.

//original signed by://

Dr. Todd Burnett
VA MidSouth Deputy Network Director (VISN 9) *for*

Cynthia Breyfogle, FACHE

For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.

Appendix G: Facility Director Comments

Department of Veterans Affairs Memorandum

Date: May 31, 2019

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

Subj: Comprehensive Healthcare Inspection of the James H. Quillen VA Medical Center, Mountain Home, TN

To: Director, VA MidSouth Healthcare Network (10N9)

1. 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.

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

(Original signed by:)
Dean B. Borsos, MHSA

For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.

OIG Contact and Staff Acknowledgments

Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
Inspection Team	Valerie Zaleski, BSN, RN, Team Leader Bruce Barnes Sheila Cooley, MSN, GNP Carrie Jeffries, DNP, FACHE Renay Montalbano, MSN, RN Schzelle Spiller-Harris, MSN, RN Carol Torczon, MSN, ACNP
Other Contributors	Judy Brown Alicia Castillo-Flores, MBA, MPH Limin Clegg, PhD Justin Hanlon, BS Henry Harvey, MS LaFonda Henry, MSN, RN-BC Gayle Karamanos, MS, PA-C Yoonhee Kim, PharmD Scott McGrath, BS Larry Ross, Jr., MS Marilyn Stones, BS Erin Stott, MSN, RN Mary Toy, MSN, RN Robert Wallace, ScD, MPH

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