DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF INSPECTOR GENERAL

Office of Healthcare Inspections

VETERANS HEALTH ADMINISTRATION

Comprehensive Healthcare Inspection of the El Paso VA Health Care System

Texas

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Figure 1. El Paso VA Health Care System, Texas (Source: *https://vaww.va.gov/directory/guide/, accessed on July 11, 2019)*

Abbreviations

ADPCS	associate director for Patient Care Services
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 outpatient setting of the El Paso VA Health Care System (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 inspections 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 inspection, 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[1] (specifically the emergency department and urgent care center operations and management).

This unannounced visit was conducted during the week of May 6, 2019. 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

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[1] The OIG's review of the emergency department and urgent care center (UCC) operations and management focused on the clinical risks of the emergency department/UCC areas. This review was not performed at the El Paso VA Health Care System because the facility did not have an emergency department or UCC.

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

At the time of the OIG's visit, the facility leadership team consisted of the director, chief of staff, associate director for Patient Care Services (ADPCS), and associate director (primarily nonclinical). Organizational communications and accountability were managed through a committee reporting structure with the Executive Health Care Council having oversight for several working groups. The director was the chair of the Quality, Safety and Value Board which ensures key quality, safety, and value functions are reviewed and monitored on a regular basis.

The facility's leadership team were all permanently appointed and had been working together for nine months. The chief of staff and associate director were the newest members of the leadership team and were appointed in April and August 2018, respectively.

The OIG reviewed selected employee satisfaction and patient experience survey results and noted opportunities for the facility's leaders to improve employee satisfaction, provide a workplace environment where employees are encouraged to do the right thing, and to improve patient experiences.

Additionally, the OIG reviewed accreditation agency findings, sentinel events,[2] 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.[3] Although the leadership team members were knowledgeable within their areas of responsibility about selected SAIL

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[2] 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."

[3] 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.)

metrics, the leaders should continue to take actions to improve performance of measures likely contributing to the facility's SAIL "1-star" quality rating.[4]

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

Medical Staff Privileging

The facility generally complied with requirements for privileging. However, the OIG identified concerns with defining and sharing in advance the process for focused professional practice evaluations and including required service-specific criteria in ongoing professional practice evaluations.[5]

Environment of Care

Generally, the OIG team found many of the performance indicators were achieved for the parent facility and Las Cruces VA Clinic and did not note any issues with the availability of medical equipment and supplies. However, the OIG identified deficiencies with the inventory of resources and assets that may be needed during emergencies and the annual review of the emergency operations plan.

Mental Health

Overall, the facility complied with many of the mental health performance indicators, including the designation of a military sexual trauma (MST) coordinator, tracking of MST-related data, and provision of clinical care. The OIG noted a concern, however, with providers completing MST mandatory training.

Geriatric Care

For geriatric patients, clinicians documented reasons for prescribing medications and medication reconciliation to minimize duplicative medications and adverse interactions. However, the OIG

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

[5] The definitions of ongoing professional practice evaluation and focused professional practice evaluations can be found within 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). An ongoing professional practice evaluation is "the ongoing monitoring of privileged providers to confirm the quality of care delivered and ensures patient safety." A focused professional practice evaluation is "a time-limited process whereby the clinical leadership evaluates the privilege-specific competence of a provider who does not yet have documented evidence of competently performing the requested privilege(s) at the facility." A focused professional practice evaluation for cause is "a time-limited period during which the medical staff leadership assesses the provider's professional performance to determine if any action should be taken on the provider's privileges."

identified inadequate patient and/or caregiver education related to newly prescribed medications and evaluation of patient/caregiver understanding when education was provided.

Women's Health

The OIG found compliance with the requirements for a designated women veterans program manager and medical director, tracking data related to cervical cancer screenings, communication of results to patients within the required time frame, and follow-up care when indicated. However, the OIG identified the Women Veterans Health Committee did not report to facility leaders.

Summary

In reviewing key healthcare processes, the OIG issued seven 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.

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 E and F, pages 55–56, 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 until they are completed.

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Assistant Inspector General
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Contents

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 outpatient setting of the El Paso VA Health Care System (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.[6] Investments in a culture of safety and quality improvement with robust communications and leadership significantly contribute to positive patient outcomes in healthcare organizations.[7] 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:

1. Leadership and organizational risks

2. Quality, safety, and value (QSV)

3. Medical staff privileging

4. Environment of care

5. Medication management (specifically the controlled substances inspection program)

6. Mental health (focusing on military sexual trauma follow-up and staff training)

7. Geriatric care (spotlighting antidepressant use for elderly veterans)

8. Women's health (particularly abnormal cervical pathology results notification and follow-up)

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[6] 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.)

[7] 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.)

9. High-risk processes (specifically the emergency department and urgent care center operations and management).[8]
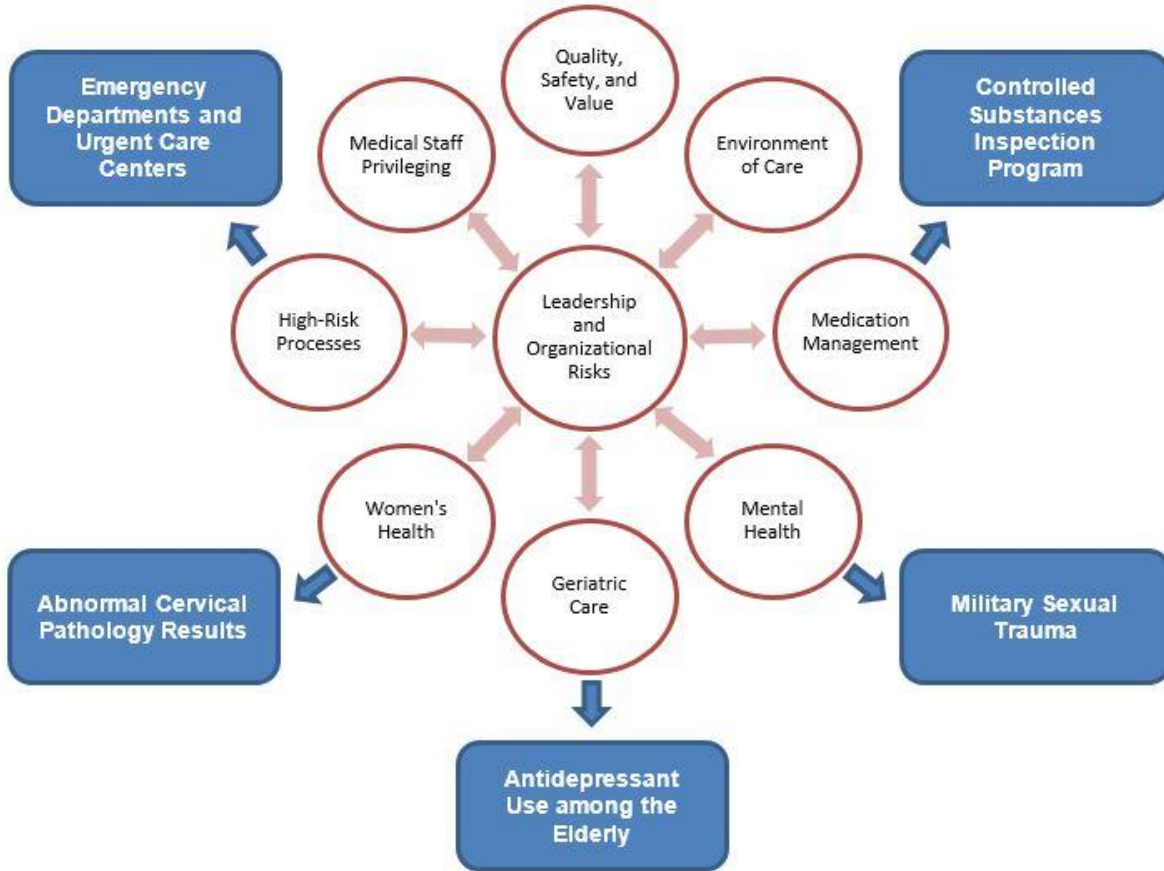
Figure 2. Fiscal Year (FY) 2019 Comprehensive Healthcare Inspection of Operations and Services
Source: VA OIG

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[8] See Figure 2. CHIP inspections address these processes during 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;[9] 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 February 11, 2017, through May 9, 2019, the last day of the unannounced site visit.[10] While on site, the OIG referred issues and concerns beyond the scope of the CHIP review to our hotline management team for further evaluation.

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.

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.

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

[10] 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.[11] 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 (primarily nonclinical). The chief of staff and ADPCS oversee patient care, which requires managing service directors and chiefs of programs and practices.

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[11] 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.)
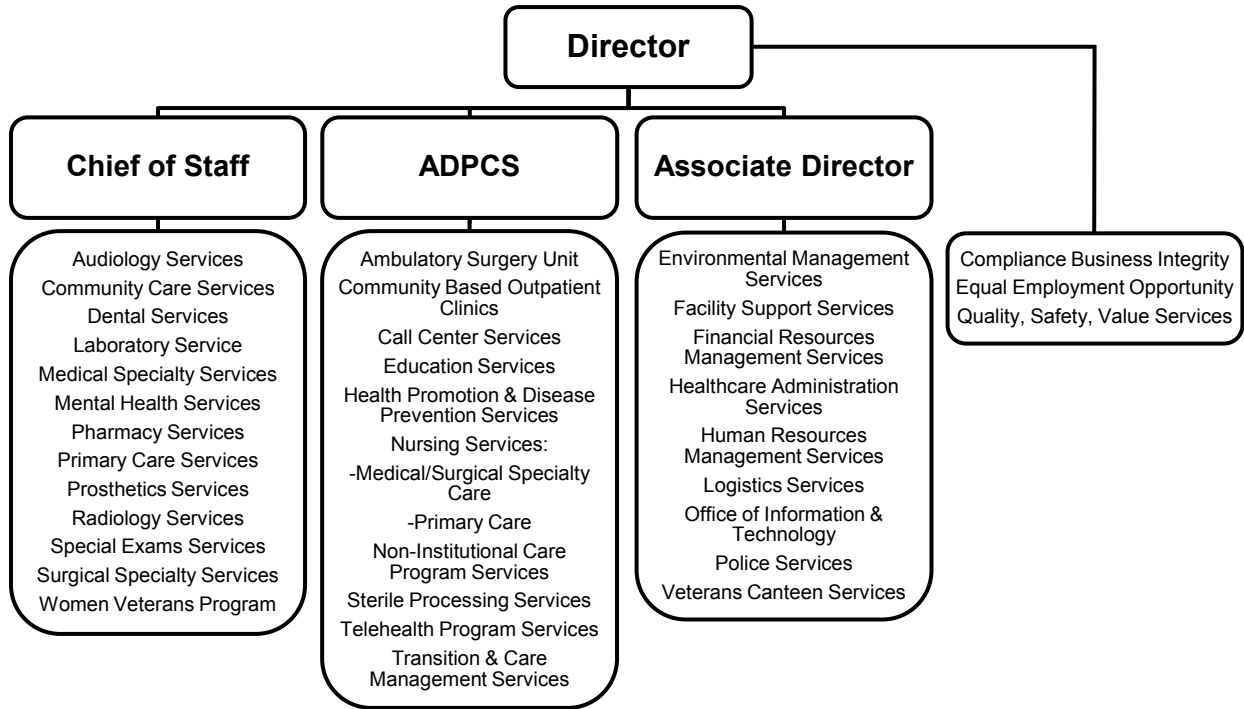
Figure 3. Facility Organizational Chart[12]
Source: El Paso VA Health Care System (received May 6, 2019)

At the time of the OIG site visit, the executive team had been working together in permanently assigned positions for nine months, although two team members (facility director and associate director for Patient Care Services) have been in their position for more than two years (see Table 1).

Table 1. Executive Leader Assignments

Leadership Position	Assignment Date
Facility director	November 13, 2016
Chief of staff	April 1, 2018
Associate director for Patient Care Services	June 17, 2012
Associate director	August 5, 2018

Source: El Paso VA Health Care System human resources officer (received May 7, 2019)

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.

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[12] At this facility, the director is responsible for Compliance Business Integrity; Equal Employment Opportunity; and Quality, Safety, Value Services.

In individual interviews, these executive leadership team members were generally 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. These are discussed in greater detail below.

The director serves as the chairperson of the Executive Health Care Council, with the authority and responsibility for establishing policy, maintaining quality care standards, and performing organizational management and strategic planning. The Executive Health Care Council oversees various working groups, such as the Administrative Executive, Clinical Executive, and Quality, Safety, and Value Boards.

These leaders are also engaged in monitoring patient safety and care through the Quality, Safety and Value Board. The director is the chair and the chief of Quality, Safety, Value Services is the vice-chair. The Quality, Safety and Value Board ensures key quality, safety, and value functions are monitored and reviewed on a regular basis, to include, but not limited to, quality management programs and systems, continuous system improvement, patient safety, risk management, and performance. It is also responsible for tracking and identifying trends and monitoring quality of care and patient outcomes, and it reports to the Executive Health Care Council. See Figure 4.
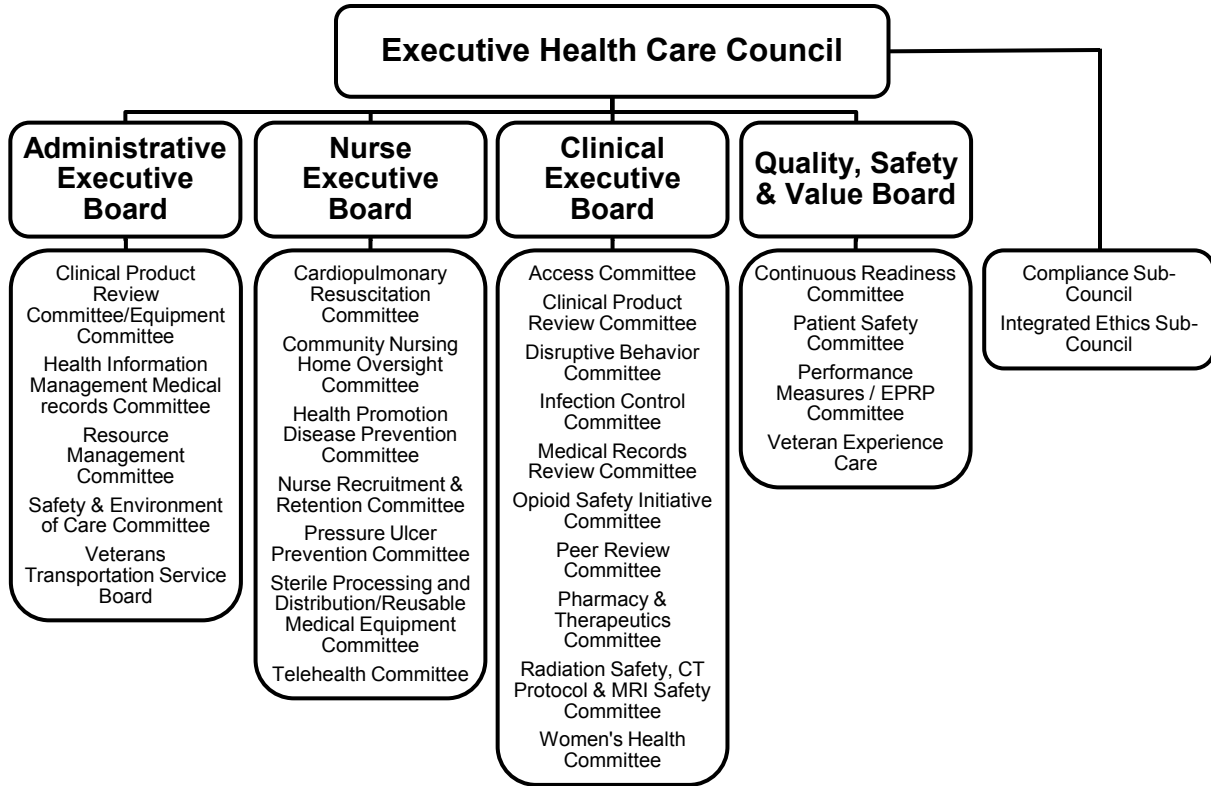
Figure 4. *Facility Committee Reporting Structure[13]*
Source: El Paso VA Health Care System (received May 6, 2019)

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 from VHA's All Employee Survey that relate to the period of October 1, 2017, through September 30, 2018.[14] Table 2 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 to be similar to the VHA average, except for the

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[13] The Executive Health Care Council directly oversees the Compliance and Integrated Ethics Sub-Councils.

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

servant leader composite.[15] The same trend was noted for the associate director, while those for the director and chief of staff were generally better than the facility and VHA averages. However, opportunities exist for the ADPCS to improve employee satisfaction.

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[16]*	0–100 where HIGHER scores are more favorable	71.7	66.7	90.7	69.4	54.8	60.0
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	3.3	4.4	3.9	3.2	3.4
All Employee Survey: *My organization's senior leaders maintain high standards of honesty and integrity.*	1 (Strongly Disagree) – 5 (Strongly Agree)	3.5	3.5	4.6	3.9	3.1	3.5

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[15] 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.

[16] According to the 2018 VA All Employee Survey 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	3.5	4.7	3.9	3.2	3.4

Source: VA All Employee Survey (accessed April 4, 2019)

Table 3 summarizes employee attitudes toward the workplace as expressed in VHA's All Employee Survey. Note that the facility averages for the selected survey questions were generally worse than the VHA average. Further, opportunities appear to exist for the ADPCS and associate director to provide a workplace environment where employees are encouraged to do the right thing.[17]

Table 3. Survey Results on Employee Attitudes toward the 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	3.6	4.9	3.9	3.2	4.3
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	3.5	4.0	3.8	3.2	3.1

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[17] The associate director scores are not reflective of the current associate director who assumed the role after the survey was administered in June 2018.

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	1.8	0.5	1.6	2.4	2.5

Source: VA All Employee Survey (accessed April 4, 2019)

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 September 30, 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.[18]

VHA also collects SHEP survey data from Patient-Centered Medical Home, Specialty Care, and Inpatient Surveys. The OIG reviewed responses to two relevant outpatient surveys that reflect patients' attitudes toward facility leaders (see Table 4). For this facility, both patient survey results reflected lower care ratings than the VHA average. The facility director reported leaders were working to improve employee attitudes so that patients feel like valued customers; efforts included leading by example and emphasizing the importance of treating patients with respect and dignity.

[18] 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 September 30, 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	n/a
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	n/a
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.	76.3	69.9
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.	76.5	66.7

Source: VHA Office of Reporting, Analytics, Performance, Improvement and Deployment (accessed December 28, 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.[19] Table 5 summarizes the relevant facility inspections most recently performed by the OIG and The Joint Commission (TJC).[20] The OIG noted that the facility has closed all requirements for improvement.

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.[21]

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

Accreditation or Inspecting Agency	Date of Visit	Number of Recommendations Issued	Number of Recommendations Remaining Open
OIG (*Clinical Assessment Program Review of the El Paso VA Health Care System, Texas, Report No. 16-00578-291, July 17, 2017*)	February 2017	10	0
TJC Ambulatory Accreditation	April 2017	11	0
TJC Behavioral Health Care Accreditation		3	0
TJC Home Care Accreditation		2	0
TJC Regular (Laboratory)	August 2017	5	0

Source: OIG and TJC (Inspection/survey results verified with the chief of Quality Management on May 7, 2019)

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[19] 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.

[20] 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."

[21] 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."

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 February 11, 2017 (the prior comprehensive OIG inspection), through May 9, 2019.[22]

Table 6. Summary of Selected Organizational Risk Factors (February 11, 2017, to May 9, 2019)

Factor	Number of Occurrences
Sentinel Events[23]	1
Institutional Disclosures[24]	1
Large-Scale Disclosures[25]	0

Source: El Paso VA Health Care System's chief of Quality Management (received May 8, 2019)

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[22] 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 El Paso VA Health Care System is a moderate complexity (2) affiliated facility as described in Appendix B.)

[23] 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."

[24] 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 leader(s), 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."

[25] According to VHA Directive 1004.08, 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."

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 SAIL "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 "1-star" for overall quality.

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[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.)

[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.
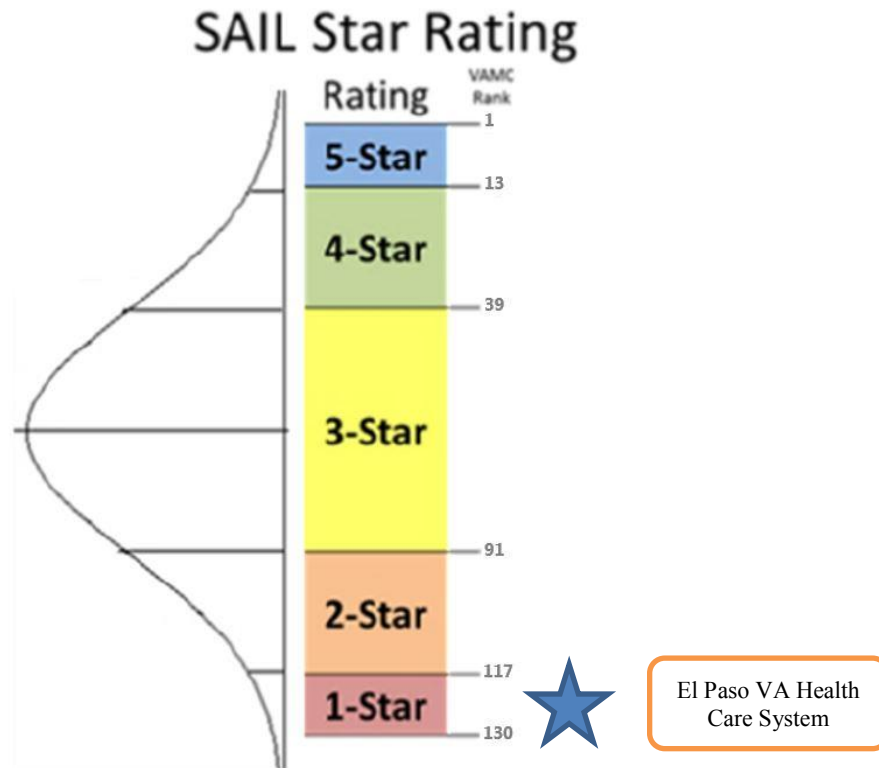
Figure 5. *Strategic Analytics for Improvement and Learning Star Rating Distribution* (*as of June 30, 2018*)
Source: VA Office of Informatics and Analytics Office of Operational Analytics and Reporting (*accessed April 8, 2019*)

Figure 6 illustrates the facility's Quality of Care and Efficiency metric rankings and performance compared with other VA facilities as of December 31, 2018. Of note, the figure uses blue and green data points to indicate high performance (for example, in the areas of call responsiveness and registered nurse (RN) turnover). Metrics that need improvement are denoted in orange and red (for example, rating primary care (PC) provider, best place to work, and rating specialty care (SC) provider.[28] Facility leaders were working to improve the quality of care through actions such as: resetting standards, allowing staff to work at the top of their licenses, and streamlining consult processes.

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

El Paso VAMC (FY2019Q1) (Metric)
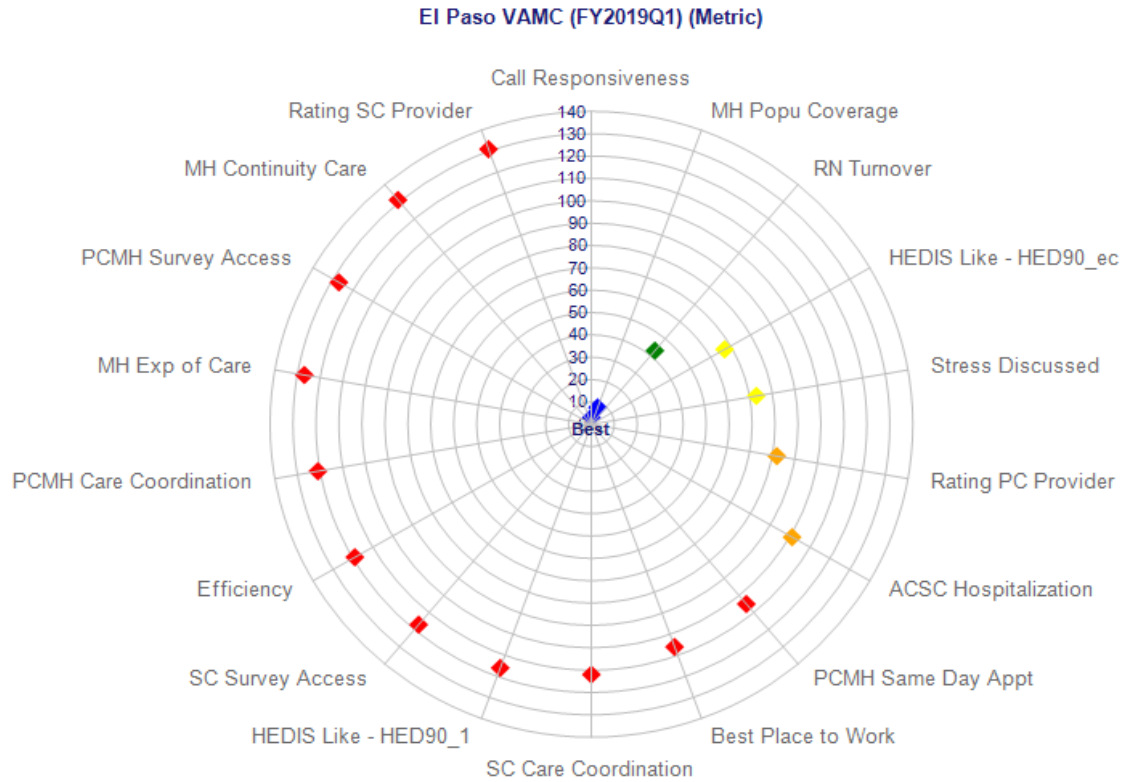
Marker color: Blue - 1st quintile; Green - 2nd; Yellow - 3rd; Orange - 4th; Red - 5th quintile.

Figure 6. *Facility Quality of Care and Efficiency Metric Rankings (as of December 31, 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.

Leadership and Organizational Risks Conclusion

The facility's executive leadership team appeared relatively stable. Selected survey scores related to employee satisfaction with the facility's executive leaders highlighted opportunities for leaders to improve employee satisfaction and to provide a workplace environment where employees are encouraged to do the right thing. In the OIG's review of selected results with the patient experience survey, the facility's results were lower than VHA averages. Facility leaders were actively working to improve employee and patient satisfaction. The OIG's review of the facility's accreditation findings, sentinel events, and disclosures did not identify any substantial organizational risk factors. The leadership team was knowledgeable within their scope of responsibility about selected SAIL metrics.

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.[29] VHA also strives to provide healthcare services that compare favorably to the best of the private sector in measured outcomes, value, and efficiency.[30] VHA requires that its facilities operate a quality, safety, and value (QSV) program to monitor the quality of patient care and performance improvement activities.[31]

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,[32] utilization management (UM) reviews,[33] patient safety incident reporting with related root cause analyses,[34] and cardiopulmonary resuscitation (CPR) episode reviews.[35]

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.[36]

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

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[29] 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 but was rescinded on October 24, 2019.)

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

[31] VHA Directive 1026.

[32] 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.

[33] According to VHA Directive 1117(2), *Utilization Management Program*, July 9, 2014 (amended April 30, 2019), UM reviews include evaluating the "appropriateness, medical need, and efficiency of health care services according to evidence-based criteria." This directive expired July 31, 2019.

[34] 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."

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

[36] VHA Directive 1190.

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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.[37]

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.[38]

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.[39]

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:[40]

- 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
  - Peer review of all applicable deaths within 24 hours of admission to the hospital
  - Peer review of all inpatient suicides within seven days after discharge from an inpatient mental health unit

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[37] VHA Directive 1117(2).

[38] VHA Handbook 1050.01.

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

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

- UM[41]

    o Completion of at least 75 percent of all required inpatient reviews

    o Documentation of at least 75 percent of physician UM advisors' decisions in the National UM Integration database

    o Interdisciplinary review of UM data

- Patient safety

    o Annual completion of a minimum of eight root cause analyses[42]

    o Inclusion of required content in root cause analyses (generally)

    o Submission of completed root cause analyses to the National Center for Patient Safety within 45 days

    o Provision of feedback about root cause analysis actions to reporting employees

    o Submission of annual patient safety report to facility leaders

- Resuscitation episode review

    o Evidence of a committee responsible for reviewing resuscitation episodes

    o Confirmation of actions taken during resuscitative events being consistent with patients' wishes

    o Evidence of basic or advanced cardiac life support certification for code team responders

    o Evaluation of each resuscitation episode by the CPR Committee or equivalent

Quality, Safety, Value Conclusion

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

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[41] The facility does not provide inpatient care.

[42] According to VHA Handbook 1050.01, "the requirement for a total of <u>eight</u> [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 analyses 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).[43]

Clinical privileges need to be specific, based on the individual's clinical competence. They are recommended by service chiefs and the Executive Committee of the Medical Staff 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.[44]

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] (OPPEs), [are] essential to confirm the quality of care delivered."[45]

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 time frame and customized to the specific provider and related clinical concerns.[46] 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.[47]

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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[43] 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.)

[44] VHA Handbook 1100.19.

[45] VHA Handbook 1100.19.

[46] 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).

[47] 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.)

- Nine solo or few (less than two in a specialty) practitioners hired within 18 months before the site visit or were privileged within the prior 12 months[48]

- Four LIPs hired within 18 months before the site visit

- Fourteen LIPs re-privileged within 12 months before the visit

- No providers underwent a FPPE for cause within 12 months prior to the visit

The OIG evaluated the following performance indicators:

- Privileging

  o Privileges requested by the provider

    - Facility-specific

    - Service-specific

    - Provider-specific[49]

  o Approval of privileges for a period of less than, or equal to, two years

- Focused professional practice evaluations

  o Criteria defined in advance

  o Use of required criteria in FPPEs for selected specialty LIPs

  o Results and time frames clearly documented

  o Evaluation by another provider with similar training and privileges

  o Executive Committee of the Medical Staff's consideration of FPPE results in its decision to recommend continuing the initially granted privileges

- Ongoing professional practice evaluations

  o Criteria specific to the service or section

  o Use of required criteria in OPPEs for selected specialty LIPs

  o Service chief's determination to recommend continuation of current privileges was based in part on the results of OPPE activities

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[48] The 18-month period was from November 6, 2017, through May 6, 2019. The 12-month review period covered May 6, 2018, through May 6, 2019; 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 fewer than three providers in the facility that are privileged in a particular specialty.

[49] 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.

- o Evaluation by another provider with similar training and privileges

- o Executive Committee of the Medical Staff's decision to recommend continuing privileges based on OPPE results

- Focused professional practice evaluations for cause

  - o Clearly defined expectations/outcomes

  - o Time-limited

  - o Provider's ability to practice independently not limited for more than 30 days

  - o Shared with the provider in advance

- Reporting of privileging actions to National Practitioner Data Bank

Medical Staff Privileging Conclusion

The facility generally complied with requirements for privileging. However, the OIG identified concerns with defining and sharing in advance the criteria for focused professional practice evaluations and including required service-specific criteria in ongoing professional practice evaluations.

For FPPEs, VHA requires that criteria are defined prior to initiation of the evaluations using objective criteria accepted by the practitioner and recommended by the service chief and Executive Committee of the Medical Staff.[50] In two of four applicable profiles reviewed, the OIG found that the criteria and evaluation process for mental health LIPs was not defined in advance. This could result in providers' misunderstanding of the FPPE expectations. The credentialing supervisor reported that the mental health FPPE process was not defined in advance due to a lack of staff knowledge.

Recommendation 1

1. The chief of staff ensures that mental health service chiefs clearly define and communicate expectations for focused professional practice evaluations in advance with providers and monitors service chiefs' compliance.

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[50] VHA Handbook 1100.19.

Facility concurred.

Target date for completion: June 30, 2020

Facility response: The need to update the focused professional practice evaluation (FPPE) process was identified and initiated in January 2019 prior to the OIG inspection. In January 2019, it was determined by the facility to conduct a review and make corrective actions back to the beginning of the fiscal year for any new personnel that joined the facility starting October 01, 2018 or later. The new personnel were still being processed through the administrative systems and had not yet worked on clinical activities that would be reviewed. The update to the process included a new form which incorporated the providers signature to demonstrate acknowledgement of the timeframe and review criteria for the FPPE plan. All providers that required FPPE for FY19 were transitioned to the updated form. This form was fully implemented as of January 2019. The service chief provides the FPPE plan to the new provider for review and signature. FPPE forms are returned to credentialing personnel and then audited for acceptance/completeness. 100% of forms are audited for completeness by the Credentialing staff. Results of that audit are presented to the Chief of Staff (N=# of FPPE forms completed appropriately / D=# of FPPE forms completed). The Chief of Staff will ensure that a 90% compliance with forms is gained and sustained for 6 months. The completion of the forms will be reviewed with the Chief of Staff during monthly Privileging and Credentialing (P&C) committee meetings. This information and results of the audit will be documented in the P&C minutes. The OIG inspection reviewed processes conducted prior to October 01, 2018, thus determining the problem with the process as well, though it had previously been identified and resolved by the facility. The form, upon completion, is collected and maintained in the providers competency folder.

VHA requires each service chief to "establish additional criteria for granting clinical privileges within the service consistent with the needs of the service and facility as well as the available resources to provide these services."[51] The OIG noted that 10 of 23 OPPE profiles reviewed (including 9 solo/few practitioners) did not include service-specific criteria. This resulted in licensed independent practitioners providing care without a thorough evaluation of their competency, which could potentially impact the quality of care and patient safety. The credentialing supervisor reported service chiefs did not develop specialized service criteria as they were unaware of the requirement.

Recommendation 2

2. The chief of staff ensures that service chiefs include service-specific criteria in ongoing professional practice evaluations and monitors service chiefs' compliance.

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[51] VHA Handbook 1100.19.

Facility concurred.

Target date for completion: October 31, 2020

Facility response: Specialty specific ongoing professional practice evaluations (OPPE) are in the process of being developed by each individual service chief to meet service specific criteria. Multiple forms are complete, and others are in process. P&C has reviewed and approved the timeline for each service. Prior to implementation of OPPE form, P&C will review and approve. The chiefs of the specialties will implement the use of the specialty specific forms within their department. The progress and adherence to the schedule developed is being reviewed monthly in the Privileging and Credentialing committee. Completed OPPE forms are displayed for P&C members to review and vote on thus allowing compliance monitoring of this requirement. The results of these votes are documented in the P&C minutes. The Chief of Staff is the chair for this committee and is thus aware of these requirements being met through attendance as well as signing the minutes from this committee. Completion of specialty-specific OPPE forms will be completed by January 31, 2020, with an ongoing monitor of compliance and an expected 90% implementation rate by all services by October 31, 2020, with six months of monitoring as recorded in Privileging and Credentialing minutes.

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.[52]

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.[53]

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.[54]

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.[55] Managers must also develop utility management plans to increase reliability and reduce failures of electrical power distribution systems in accordance with TJC,[56]

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

[53] 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).

[54] 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.)

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

[56] VHA Directive 1028, *Electrical Power Distribution Systems*, July 25, 2014. (This VHA Directive was scheduled for recertification on or before the last working date of July 2019 and has not been recertified.)

Occupational Safety and Health Administration,[57] and National Fire Protection Association standards.[58] The provision of sustained electrical power during disasters or emergencies is critical to healthcare facility operations.[59]

The OIG inspected nine areas in the parent facility—a primary care clinic (A, B, and C); a specialty clinic-1 (orthopedic, podiatry, and diabetes); the outpatient mental health clinic; the women's health clinic; the cardiology clinic; the urology clinic; the dental clinic; the post-anesthesia care unit; and the rehabilitation services unit (physical therapy, occupational therapy, and speech pathology). The team also inspected the Las Cruces VA Clinic in New Mexico. 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[60]
    - Mental health environment of care rounds

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[57] 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.)

[58] 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.)

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

[60] The facility did not have an inpatient mental health unit.

- o Nursing station security

- o Public area and general unit safety

- o Patient room safety

- o Infection prevention

- o Availability of medical equipment and supplies

- Emergency management

- o Hazard vulnerability analysis (HVA)

- o Emergency operations plan (EOP)

- o Emergency power testing and availability

Environment of Care Conclusion

Generally, the OIG team found that many of the performance indicators were achieved for the parent facility and Las Cruces VA Clinic and did not note any issues with the availability of medical equipment and supplies. However, the OIG identified deficiencies in emergency management that warranted recommendations for improvement.

Specifically, VHA requires facilities to have a comprehensive emergency management plan that includes an annual review of the inventory of resources and assets that may be needed during emergencies.[61] The OIG found no evidence that the facility had a current inventory of resources and assets, which resulted in a lack of assurance that the facility is prepared for contingency operations during emergencies. The emergency management coordinator reported that the current inventory list of resources and assets was destroyed by water damage prior to the annual review, therefore, the inventory was not completed.

Recommendation 3

3. The facility director ensures the emergency management coordinator conducts an annual inventory of resources and assets and monitors coordinator's compliance.

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[61] VHA Directive 0320.01, *Comprehensive Emergency Management Program Procedures*, April 6, 2017.

Facility concurred.

Target date for completion: June 30, 2020

Facility response: The Emergency Management Coordinator has added an annual inventory of resources and assets to the agenda and minutes of the Emergency and Disaster Committee (E&D). This annual requirement is now tracked and documented in the Emergency and Disaster Committee minutes by the Emergency Management Coordinator. The information documented in the Emergency and Disaster Committee minutes will also be sent forward after every meeting, as is standard protocol, to be included in the Safety and Environment of Care Committee (SEOCC), the committee that has oversight of the E&D committee, minutes for the review and awareness of the Associate Director, an executive leadership member. A memorandum will also be written annually by the Emergency Management Coordinator documenting the inventory of resources and assets. This memorandum will then be provided to the Associate Director and the Director for their review. All parties involved in the development and review of this document will sign the memorandum to show documented evidence of their awareness of this information. Prior to the OIG site visit, an email was sent out to the Emergency and Disaster Committee on March 15, 2019, concerning the emergency cache supplies with a request for members to vote by March 26, 2019. On March 26, 2019, the facility experienced a water intrusion event. A water pipe leaked for a period causing flooding in the building which destroyed the entirety of the emergency cache supplies. In order to determine the best replacement supplies, a hazard vulnerabilities assessment (HVA) was conducted. The final version of the HVA was signed by the Facility Director on July 19, 2019. On August 08, 2019 the emergency cache inventory was discussed with the Emergency and Disaster Committee membership. On August 12, 2019, the draft emergency cache supply list was sent out to committee members for review. Upon completion of review by the committee members, a finalized cache supply list was determined on August 14, 2019. The supplies were then ordered on August 29, 2019. Currently, the facility is pending the receipt of items ordered. Facility will monitor meeting minutes to ensure that discussion included emergency cache items. The Emergency Management Coordinator will monitor the minutes for 6 months to ensure 100% compliance of documentation requirements.

In addition, the Joint Commission requires hospitals to develop and maintain a written emergency operations plan that describes the response procedures to follow when emergencies occur.[62] The OIG found that the facility did not have an operational emergency operations plan. This resulted in a lack of assurance that the facility is prepared for contingency operations during emergencies. The emergency management specialist was aware of the requirement and stated an emergency operations plan was developed but had not yet been reviewed by the Safety and

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[62] TJC. Emergency Management standard EM.02.01.01, EP 2.

Environment of Care Committee nor approved by executive leadership due to a gap in hiring an emergency management coordinator after the previous coordinator retired.

Recommendation 4

4. The facility director ensures that an emergency operations plan that describes the response procedures to follow when emergencies occur is developed and maintained as required.

Facility concurred.

Target date for completion: September 30, 2020

Facility response: An operational emergency operations plan (EOP) was not in place during the time of the OIG inspection, because it had not been reviewed by the Emergency and Disaster Committee (E&D) and signed off on by the facility leadership. A hazard vulnerabilities assessment (HVA) was developed by the Emergency Management Coordinator and signed by the Facility Director on July 19, 2019. The HVA was then used by the Emergency Management Coordinator to update an operational EOP. The updated EOP was completed and signed by the Facility Director on August 13, 2019. The EOP has been added to the agenda/minutes of the E&D by the Emergency Management Coordinator for review annually by the membership of this committee. The information documented in the E&D Committee minutes will also be sent forward after every meeting, as is standard protocol, to be included in the Safety and Environment of Care Committee (SEOCC), the committee that has oversight of the E&D committee, minutes for the review and awareness of the Associate Director, an executive leadership member. A memorandum will also be written annually, by the Emergency Management Coordinator, documenting a review of the EOP. This memorandum will then be provided to the Associate Director and the Director for their review. All parties involved in the development and review of this document will sign the memorandum to show documented evidence of their awareness of this information. This signed memorandum will then be maintained by the Emergency Management Coordinator and available for review as needed. Documentation of this memo being signed will be recorded in the E&D committee minutes as a record of adherence to this annual requirement.

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

  o Monthly summary of findings to the director

  o Quarterly trend reports to the director

  o Quality Management Committee's review of monthly and quarterly trend reports

  o Actions taken to resolve identified problems

- Pharmacy operations

  o Staff restrictions for monthly review of balance adjustments[67]

- Requirements for controlled substances inspectors

  o No conflicts of interest

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[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 October 1, 2018, through March 31, 2019.

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

- o Appointed in writing by the director for a term not to exceed three years

  o Hiatus of one year between any reappointment

  o Completion of required annual competency assessment

- Controlled substances area inspections

  o Completion of monthly inspections

  o Rotations of controlled substances inspectors

  o Patterns of inspections

  o Completion of inspections on day initiated

  o Reconciliation of dispensing between pharmacy and each dispensing area

  o Verification of controlled substances orders

  o Performance of routine controlled substances inspections

- Pharmacy inspections

  o Monthly physical counts of the controlled substances in the pharmacy

  o Completion of inspections on day initiated

  o Security and verification of drugs held for destruction[68]

  o Accountability for all prescription pads in pharmacy

  o Verification of hard copy-controlled substances prescriptions

  o Verification of twice a week (three days apart) inventories of the main vault[69]

  o Quarterly inspections of emergency drugs

  o Monthly checks of locks and verification of lock numbers

- Facility review of override reports[70]

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[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] VHA Handbook 1108.01, *Controlled Substances (Pharmacy Stock)*, November 16, 2010. (This handbook was rescinded on May 1, 2019, and replaced by VHA Directive 1108.01, *Controlled Substsances Management*.)

[70] 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

Generally, the facility achieved the performance indicators listed above. The facility did not have any patient care areas with controlled substances and our review only included controlled substances coordinator reports, pharmacy operations, requirements for controlled substances inspectors, and pharmacy inspections. The OIG made no recommendations.

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."[71] 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.[72]

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.[73] Additionally, the facility director is responsible for ensuring that MST-related data are tracked and monitored.[74]

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.[75] Those who screen positive must have access to appropriate MST-related care.[76] 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.[77]

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.[78] All mental health and primary care providers must complete MST mandatory

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

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

[73] VHA Directive 1115.

[74] 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.)

[75] 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."

[76] VHA Directive 1115.

[77] VHA Handbook 1160.01.

[78] 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.[79]

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 50 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

    o Establishes and monitors MST-related staff training

    o Establishes and monitors informational outreach

    o Communicates MST-related issues, services, and initiatives with local leaders

- Evidence of tracking MST-related data

- Provision of clinical care

    o Referral for MST-related care to patients with positive MST screens

    o Initial evaluation within 24 hours of referral for mental health services

    o 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 OIG found compliance with many of the performance indicators, including the designation of an MST coordinator, tracking of MST-related data, and provision of clinical care. There was concern noted with providers completing MST mandatory training that warranted a recommendation for improvement.

Specifically, VHA requires that all mental health and primary care providers complete MST mandatory training; for those hired after July 1, 2012, this training must be completed no later than 90 days after assuming their position.[80] The OIG found 3 of 19 providers hired after July 1, 2012, did not complete the required training within 90 days after entering their position, and 6 of 19 providers did not complete training at all. This could potentially prevent clinicians from

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[79] 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, *Compliance with Military Sexual Trauma (MST) Mandatory Training for Mental Health and Primary Care Providers,* February 2, 2016.

[80] VHA Directive 1115.01.

providing appropriate counseling, care, and service to veterans who experienced MST. The talent management system (TMS) manager reported that the facility failed to ensure that employees were properly assigned to the appropriate MST training modules in TMS.[81]

Recommendation 5

5. The facility director confirms that primary care and mental health providers complete military sexual trauma mandatory training within the required time frame and monitors providers' compliance.

Facility concurred.

Target date for completion: June 30, 2020

Facility response: Personnel delinquent in military sexual trauma mandatory training were informed of the need to complete this requirement. As of September 16, 2019, Primary Care had 99% and Mental Health had 97% overall compliance with meeting this metric. The remaining staff members are being contacted and directed to accomplish this training. The Military Sexual Trauma (MST) Coordinator is now monitoring compliance and will review this metric on a monthly basis. Mental Health leadership has provided the MST Coordinator with reporting parameters via a memorandum. The MST Coordinator will review compliance monthly and determine if there is a 95% or greater compliance rating with the required training for Primary Care and Mental Health. If compliance falls below 95% the MST Coordinator will notify Mental Health leadership within three business days. If, as expected, the compliance stays above 95% the MST Coordinator will provide quarterly reports to Mental Health leadership via a documented memorandum stating the compliance for the months included in the quarter. Compliance will be monitored until compliance is gained and sustained for 2 consecutive quarters. The Mental Health leadership will review and sign the memorandum. This memorandum will then be provided to the Chief of Staff and Facility Director for review. The Chief of Staff and Facility Director will sign the memorandum to show acknowledged awareness of the current compliance rates of MST mandatory training. The signed memorandum will then be maintained by the MST Coordinator and available for review as needed.

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[81] Talent Management System (TMS) is a centralized electronic location where VA employees complete mandatory training and learning history is stored.

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 remission. Monitoring includes assessment of symptoms, adherence to medication and

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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.

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 inspection team interviewed key employees and managers. The team also reviewed the electronic health records of 24 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

Generally, the OIG found compliance with providers justifying the reason for medication initiation and reconciling the patients' medications. However, the OIG identified inadequate patient and/or caregiver education related to newly prescribed medications and evaluation of patient/caregiver understanding when education was provided which warranted a recommendation for improvement.

Specifically, TJC requires that clinicians educate patients and families about safe and effective use of medications and evaluate patient/caregiver understanding of the education provided.[91] VHA also stipulates that the care "must be recorded and authenticated [in the medical record] immediately after the care event…to ensure that the proper documentation is available. This ensures quality patient care."[92] The OIG estimated that clinicians provided education to 54 percent of the patients at the facility, based on the electronic health records reviewed.[93] In addition, OIG estimated that clinicians assessed understanding of education provided to 62 percent of the patients.[94] Providing medication education is important for patients as this allows them to manage their health at home.[95] The Primary Care, Mental Health, and Psychiatry service

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[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. Provision of Care standard PC.02.03.01, EP10.

[92] VHA Handbook 1907.01, *Health Information Management and Health Records*, March 19, 2015.

[93] The OIG is 95 percent confident that the true compliance rate is somewhere between 33.4 and 74 percent, which is statistically significantly below the 90 percent benchmark.

[94] The OIG is 95 percent confident that the true compliance rate is somewhere between 33.4 and 89 percent, which is statistically significantly below the 90 percent benchmark.

[95] TJC. Provision of Care standard PC.02.03.01.

chiefs reported providers were reportedly aware of the requirements and claimed that they were educating patients and evaluating their understanding of the education but failed to document these actions in the patients' electronic health record.

Recommendation 6

6. The chief of staff ensures that clinicians provide and document patient/caregiver education and assess understanding of education provided about newly prescribed medications and monitors clinicians' compliance.

Facility concurred.

Target date for completion: October 31, 2020

Facility response: An electronic template was developed for use in the medical record that contains mandatory fields. The template was developed by the Chief of Primary Care and the Consulting Supervisory Psychiatrist and they are providing the education to their respective departments. The mandatory fields require the two elements discussed in the finding: documented patient/caregiver education provided by the clinician and a documented assessment of their understanding of the education provided concerning newly prescribed medications. Training and implementation of the template will occur by December 31, 2019. This will be used in the electronic medical record by the Chief of Primary Care and the Consulting Supervisory Psychiatrist for their respective departments. An oversight review of the appropriate use of the template and its ability to assess the goals of documenting patient education provided as well as their understanding will be accomplished in steps by the Chief of Primary Care and the Consulting Supervisory Psychiatrist. The review of template use and compliance will occur monthly until 90% compliance is gained and sustained for a minimum of 6 months. Progress of actions will be reported to the Quality department monthly for review of status. When necessary, staff members needing further guidance will be contacted by the Chief of Primary Care or the Consulting Supervisory Psychiatrist to aid them in meeting the requirement based upon the reviews performed. The Chief of Primary Care and the Consulting Supervisory Psychiatrist will document the compliance rates in a memorandum on a monthly basis until 6 consecutive months of 90% compliance is accomplished to demonstrate ongoing compliance. This memorandum will be signed by the Chief of Primary Care and the Consulting Supervisory Psychiatrist for their respective departments. The Mental Health department memorandum will also be reviewed and signed by the Chief of Mental Health. Both the Primary Care and Mental Health memorandums will then be provided to the Chief of Staff by these respective departments for review. The memorandums will then be signed by the Chief of Staff to acknowledge awareness of the compliance rates of the requirements in the findings referenced above and the signed memorandums will be provided back to the respective departments to allow them to maintain these records. These records will be available as needed for future reference.

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.[96] Human papillomavirus (HPV) can be transmitted during sexual contact and is the main cause of cervical cancer.[97] 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.[98] Cervical cancer is highly preventable through diligent screening and vaccination efforts. With early detection, it is very treatable and associated with optimal patient outcomes.[99]

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.[100]

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 leaders. The facility must also have a process to ensure the collecting and tracking of data related to cervical cancer screenings.[101]

VHA has established time frames 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 results to patients must be documented. The facility must ensure that appropriate follow-up care is provided to patients with abnormal results.[102]

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[96] 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.)

[97] Centers 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.)

[98] 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.)

[99] Centers 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.)

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

[101] VHA Directive 1330.01(2).

[102] VHA Directive 1330.01(2).

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 29 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 veteran's program manager

- Appointment of a women's health medical director or clinical champion

- Facility Women Veterans Health Committee

  o Core membership

  o Quarterly meetings

  o Reports to clinical executive leaders

- Collection and tracking of cervical cancer screening data

  o Notification of patients due for screening

  o Completed screenings

  o Results reporting

  o Follow-up care

- Communication of abnormal results to patients within required time frame

- Provision of follow-up care for abnormal cervical pathology results, if indicated

Women's Health Conclusion

Generally, the OIG found compliance with many of the performance indicators such as appointment of a designated women veterans program manager and women's health medical director, tracking of data related to cervical cancer screenings, communication of abnormal test results to patients within the required time frame, and follow-up care when indicated. The OIG noted a concern with the Women Veterans Health Committee not reporting to the Clinical Executive Board that warranted a recommendation for improvement.

Specifically, VHA requires that the Women Veterans Health Committee report to executive leadership with signed minutes.[103] The OIG reviewed Clinical Executive Board minutes from October 1, 2018, through March 30, 2019, and found the Women Veterans Health Committee, referred to as the Women's Health Committee at this facility, did not report to facility leadership. Failure to report activities to executive leadership has the potential to impede support and

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[103] VHA Directive 1330.01(2).

oversight of the women's health program.[104] The women veterans program manager reported an awareness of the requirement and reported giving the women health report verbally to the Clinical Executive Board, however, could not explain why the reported information was not documented in the Clinical Executive Board minutes.

Recommendation 7

7. The chief of staff makes certain that the Women Veterans Health Committee reports to leaders with signed minutes and monitors committee's compliance.

Facility concurred.

Target date for completion: January 31, 2020

Facility response: The Women Veterans Health Committee minutes are now provided to and included in the minutes of the Clinical Executive Board (CEB), chaired by the Chief of Staff, on a quarterly basis. The CEB minutes demonstrate the Women Veterans Health Committee minutes were reported to leaders during the CEB and began being included as of June 24, 2019. The women's committee also presented in the CEB on September 23, 2019. The minutes from the September 23, 2019, CEB are pending completion and review. Quality will monitor to ensure that at least 100% of the time Women's Health Committee minutes are reported through CEB for 2 consecutive quarters. Upon completion of this second set of quarterly CEB minutes 6 months of ongoing compliance will have been attained and allow a recommendation for closure of this item.

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[104] VHA Directive 1330.01(2).

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	Seven 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	• Service chiefs include service-specific criteria in OPPEs.	• Mental health service chiefs clearly define and communicate expectations for FPPEs in advance with providers.

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	• The emergency management coordinator conducts an annual inventory of resources and assets.
			• An emergency operations plan that describes the response procedures to follow when emergencies occur is developed and maintained as required.

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	• None
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	• Primary care and mental health providers complete MST mandatory training within the required time frame.
Geriatric Care: Antidepressant Use among the Elderly	• 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	• Clinicians provide and document patient/caregiver education and assess understanding of education provided about newly prescribed medications.	• None
Women's Health: Abnormal Cervical Pathology Results Notification and Follow-Up	• Appointment of a women veteran's 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	• None	• The Women Veterans Health Committee reports to leaders with signed minutes.

Healthcare Processes	Performance Indicators	Critical Recommendations for Improvement	Recommendations for Improvement
	• Communication of abnormal results to patients within required time frame • Provision of follow-up care for abnormal cervical pathology results, if indicated		

Appendix B: Facility Profile and VA Outpatient Clinic Profiles

Facility Profile

The table below provides general background information for this medium complexity (2) affiliated[105] facility reporting to VISN 17.[106]

Table B.1. Facility Profile for El Paso VA Health Care System (756/00)
(October 1, 2015, through September 30, 2018)

Profile Element	Facility Data FY 2016[107]	Facility Data FY 2017[108]	Facility Data FY 2018[109]
Total medical care budget dollars	$209,557,107	$224,558,601	$286,653,460
Number of:			
• Unique patients	34,151	33,984	34,890
• Outpatient visits	339,029	354,873	372,957
• Unique employees[110]	723	782	811
Type and number of operating beds:	0	0	0

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.

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[105] Associated with a medical and osteopathic residency program.

[106] The VHA medical centers are classified according to a facility complexity model; a designation of "2" indicates a facility with "medium volume, low risk patients, few complex clinical programs, and small or no research and teaching programs."

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

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

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

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

VA Outpatient Clinic Profiles[111]

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)[112]

Location	Station No.	Primary Care Workload/ Encounters	Mental Health Workload/ Encounters	Specialty Care Services[113] Provided	Diagnostic Services[114] Provided	Ancillary Services[115] Provided
Las Cruces, NM	756GA	8,485	5,930	Dermatology Endocrinology Neurology	EKG	Pharmacy Social work Weight management Nutrition

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[111] Includes all outpatient clinics in the community that were in operation as of February 8, 2019. The OIG omitted (756QB) El Paso, TX, as no workload/encounters or services were reported.

[112] 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."

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

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

[115] 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[113] Provided	Diagnostic Services[114] Provided	Ancillary Services[115] Provided
El Paso, TX	756GB	11,797	6,314	Dermatology Endocrinology	n/a	Pharmacy Social work Weight management

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[116]
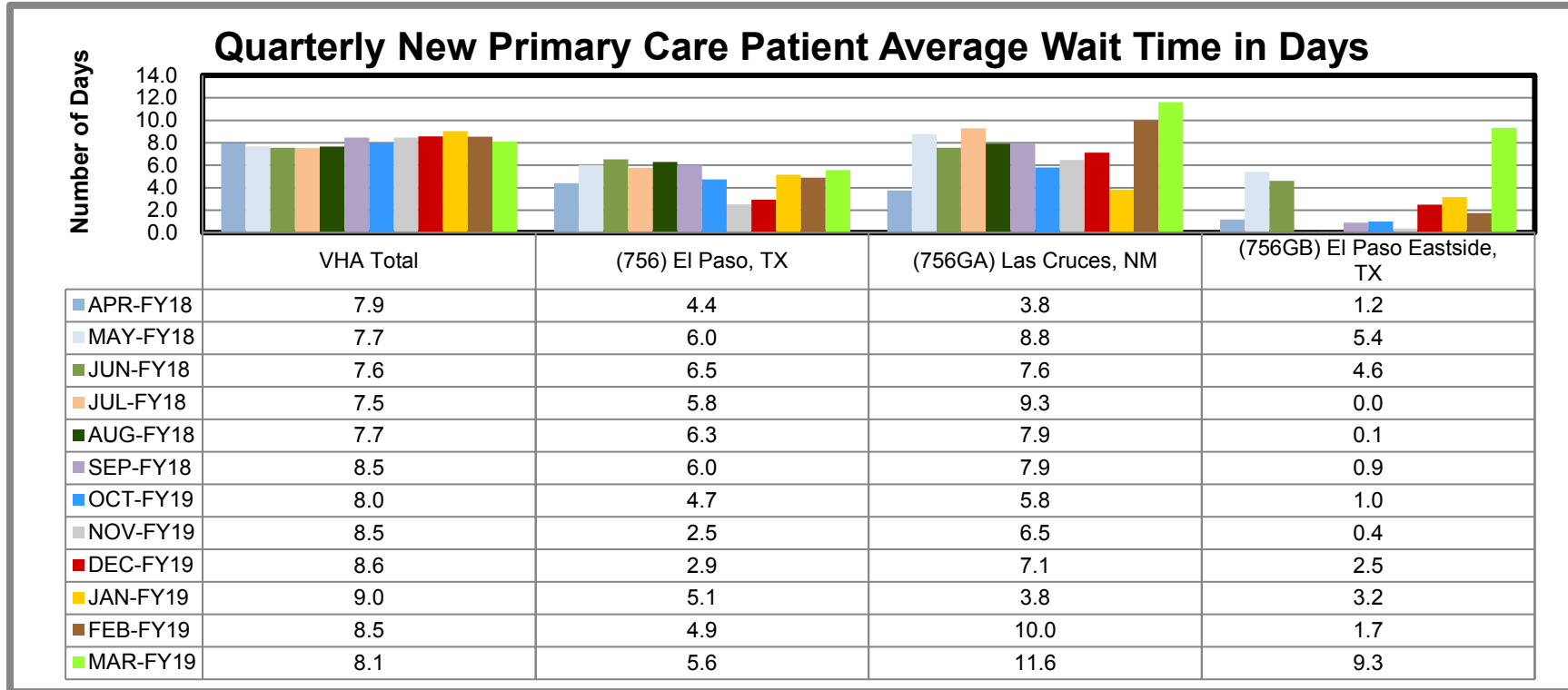
Quarterly New Primary Care Patient Average Wait Time in Days

	VHA Total	(756) El Paso, TX	(756GA) Las Cruces, NM	(756GB) El Paso Eastside, TX
APR-FY18	7.9	4.4	3.8	1.2
MAY-FY18	7.7	6.0	8.8	5.4
JUN-FY18	7.6	6.5	7.6	4.6
JUL-FY18	7.5	5.8	9.3	0.0
AUG-FY18	7.7	6.3	7.9	0.1
SEP-FY18	8.5	6.0	7.9	0.9
OCT-FY19	8.0	4.7	5.8	1.0
NOV-FY19	8.5	2.5	6.5	0.4
DEC-FY19	8.6	2.9	7.1	2.5
JAN-FY19	9.0	5.1	3.8	3.2
FEB-FY19	8.5	4.9	10.0	1.7
MAR-FY19	8.1	5.6	11.6	9.3

Source: VHA Support Service Center

Note: The OIG did not assess VA's data for accuracy or completeness. The OIG omitted (756QB) El Paso, TX, as no workload/encounters or services were 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.

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

Quarterly Established Primary Care Patient Average Wait Time in Days

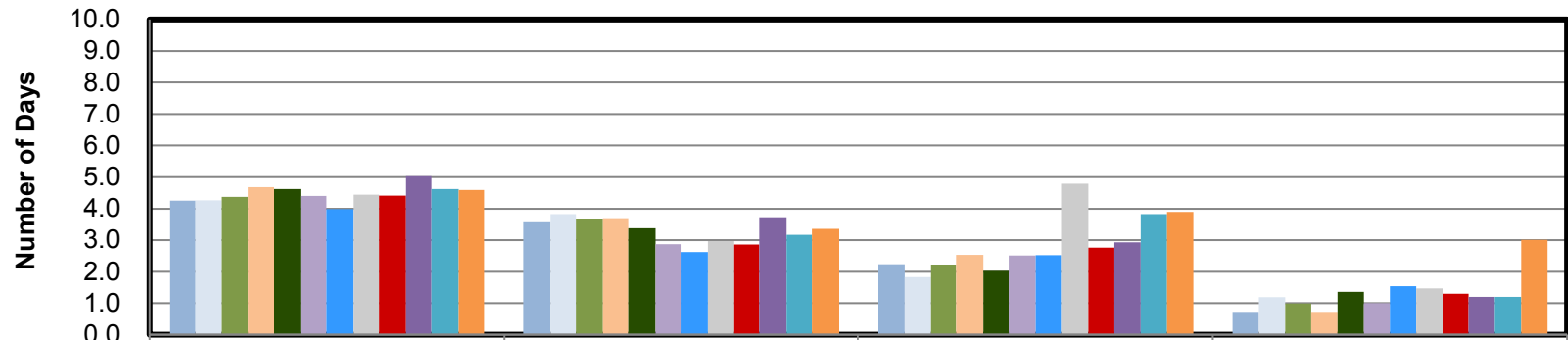|	VHA Total	(756) El Paso, TX	(756GA) Las Cruces, NM	(756GB) El Paso Eastside, TX
APR-FY18	4.3	3.6	2.2	0.7
MAY-FY18	4.3	3.8	1.8	1.2
JUN-FY18	4.4	3.7	2.2	1.0
JUL-FY18	4.7	3.7	2.5	0.7
AUG-FY18	4.6	3.4	2.0	1.4
SEP-FY18	4.4	2.9	2.5	1.0
OCT-FY19	4.0	2.6	2.5	1.5
NOV-FY19	4.4	3.0	4.8	1.5
DEC-FY19	4.4	2.9	2.8	1.3
JAN-FY19	5.0	3.7	2.9	1.2
FEB-FY19	4.6	3.2	3.8	1.2
MAR-FY19	4.6	3.4	3.9	3.0

Source: VHA Support Service Center

Note: The OIG did not assess VA's data for accuracy or completeness. The OIG omitted (756QB) El Paso, TX, as no workload/encounters or services were 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[117]

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	Percent 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	Percent 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	Percent 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

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[117] 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 September 3, 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 (specialty care) 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: VISN Director Comments

Department of Veterans Affairs Memorandum

Date: October 24, 2019

From: Director, VA Heart of Texas Health Care Network (10N17)

Subj: Comprehensive Healthcare Inspection of the El Paso VA Health Care System, TX

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

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

Thank you for the opportunity to provide an initial response for the OIG CHIP Draft Report for the El Paso VA Health Care System.

I have reviewed and concur with the findings, recommendations, and action plans submitted in the report.

(Original signed by:)

Mark Doskocil
Deputy Network Director, VA Heart of Texas Health Care Network
VISN 17

for

Jeff Milligan
Network Director, VA Heart of Texas Health Care Network
VISN 17

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 F: Facility Director Comments

Department of Veterans Affairs Memorandum

Date: October 24, 2019

From: Director, El Paso VA Health Care System (756/00)

Subj: Comprehensive Healthcare Inspection of the El Paso VA Health Care System, TX

To: Director, VA Heart of Texas Health Care Network (10N17)

1. I have reviewed and concur with the findings and recommendations in the report of the CHIP Review of the El Paso VA Health Care System El Paso, Texas.

2. Corrective action plans have been established, with some being already implemented and target dates have been set for the remaining items as detailed in the report.

(Original signed by:)

Michael L. Amaral

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

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