



LETTER FROM THE CHIEF

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Dear Colleagues,

Welcome to the first issue of our new Veterans Health Administration (VHA) Office of Risk Management (ORM) quarterly newsletter, *CONNECTION*. As the name suggests, we will publish this newsletter every three months as a way to better connect with each other. We'll also highlight the important work being done in our program offices to a broader VHA audience.

For our first issue, I want to remind you all of how our respective teams come together to strengthen trust in the Veterans Healthcare System. As Team ORM, we are charged with managing risk across the VHA system and serving as VHA's resource for clinical, organizational and research ethics.

With that mission in mind, what does success look like for us?

Success for Team ORM occurs when we have fostered a culture of collaboration and accountability across VHA—not just the programs to which we are aligned.

When we are successful, every person, at every level, working in every part of VHA—from VA medical facilities to Veterans Integrated Service Networks (VISNs) to VHA headquarters—adheres to the same set of principles and guidelines. Our goal is for every VHA employee to share a commitment for addressing issues before they become possible problems. We achieve this by creating [fostering and maintaining] an

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Story ideas can be submitted to: oreteamdis@disconsulting.com.

environment where every VHA employee feels safe to report concerns, raise alarms and ask questions.

So, how can we get there?

Team ORM is challenged to grow and nurture relationships across the enterprise, by demonstrating a Just Culture through encouraging openness and collaboration. This effort will require full commitment from each and every one of us.

I challenge you to demonstrate personal courage every day—and to inspire that same personal courage in your colleagues. Your success means VHA operates with high Integrity and provides the best care possible to the Veterans we serve. I encourage you to take a few minutes to [watch this video](#) for more information about my vision for our team.

Thank you for your commitment to VHA's mission.

WHAT IS RISK? AND WHY IS IT IMPORTANT?

A Q&A WITH WILLIAM BOWMAN, CERTIFIED INTERNAL AUDITOR, ENTERPRISE RISK MANAGEMENT

What is Enterprise Risk Management?

Enterprise Risk Management (ERM) is a discipline that identifies, assesses, and manages risks across an organization.

Through adequate risk management, agencies can concentrate efforts towards key points of failure and reduce or eliminate the potential for disruptive events.

WHAT IS RISK? AND WHY IS IT IMPORTANT?

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Why don't you like using the word "risk" when you talk about ERM?

"Risk" can have a negative connotation. When people hear the word risk they think about threats, and patient safety. But risk is not inherently bad. In the context of ERM, risk is uncertainty. So instead of using that word, I prefer to use opportunities and threats. That more completely defines what we mean when we talk about risk. Through ERM, we identify threats, such as the possibility of cyber attacks to VHA's systems. And we identify opportunities, like ways to reduce unnecessary costs and improve efficiency.

What value does ERM provide to VHA?

ERM provides a big-picture view of organizational challenges at VHA, allowing us to more effectively allocate resources in order to fulfil our mission to honor America's Veterans by providing exceptional health care.

While agencies cannot respond to all risks related to achieving strategic objectives and performance goals, they must identify, measure, and assess risks related to mission delivery. For instance, during the pandemic we were given the opportunity to look at the workplace differently, and to examine the possibilities for an expansion of tele-work and what that might look at from a variety of perspectives.

What are the challenges to managing risk at VHA?

The biggest challenge at VHA is that we are a vast organization and program offices tend to operate in silos. People may not understand that risk in one of those silos can impact the entire enterprise. Also, people don't necessarily know the mechanisms to report risk and participate in the risk governance cycle. These are areas we should work on as we continue to improve our effectiveness as an organization.

How do you work with the program offices to help them manage risk?

Recently, I have begun partnering with the offices within the Office of Risk Management to have a more robust and integrated risk-collection process. We've deployed a "bottom-up, top-down" method of gathering risks from VA medical facilities and VISNs, and also from VHA program offices. We discuss those risks as a group, then govern those risks through a process. Those risks are shared with our senior leaders as well as other organizations throughout VA. This process allows leadership to focus on VHA's greatest risks and take action to help better manage them.

ERM has also launched the VHA ERM Community of Practice, which is comprised of risk professionals throughout VHA. This group meets monthly for 45 minutes to share best practices, learn from one another, and develop professionally. Anyone is welcome to join and should email VHAERM@va.gov and request to be added to the email distribution list. VHA ERM is always available to help organizations develop their own ERMs.

WHY OUR WORK MATTERS: MANAGING RISK TO IMPROVE VETERANS' HEALTH CARE

VHA employees at all levels play a critical role in ensuring Veteran safety and care, as we all have a duty to protect Veterans by acting and [leading with integrity](#), and by following ethical standards and guidelines. Having compliance at the core of all business and clinical functions allows employees to catch problems before they end up potentially causing harm (physically, emotionally, or financially) to Veterans and their loved ones.

VHA was recently reorganized to maximize services to VA medical facilities and Veterans. One of the major efforts of the reorganization was to transfer the Office of Operational Excellence (OE) to the Office of Quality and Patient Safety (QPS) and to create the Office of Risk Management (ORM). ORM's goal is straight forward: **To improve VHA's organizational performance, efficiency and accountability**

through the dissemination of best practices related to organizational legal and regulatory risk, ethics and oversight and accountability activities. Through coordinated work in five program offices.

- Compliance and Business Integrity
- Internal Audit
- The Medical Inspector
- National Center for Ethics in Health Care
- Research Oversight

ORM is at the forefront of VA's transformation activities, managing risk and ensuring the integrity of the health system. Although non-clinical, ORM employees directly impact the care of our Veterans, especially in the instance of zero patient harm.

WHY OUR WORK MATTERS: MANAGING RISK TO IMPROVE VETERANS' HEALTH CARE

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In February 2019, VHA launched an enterprise-wide High Reliability Organization (HRO) transformation effort and made a long-term commitment to pursuing a goal of Zero Harm. As Veterans Integrated Service Networks (VISNs) and VA Medical Centers (VAMCs) advance toward HRO maturity, leaders are applying an organization-wide commitment to Zero Harm by developing a strong safety culture featuring empowered, collaborative frontline teams supported by engaged leadership within a climate of trust and continuous improvement.

One of the core principles of HRO is “preoccupation with failure” which means catching errors before they happen and predicting and eliminating risks before they cause harm. High reliability supports bringing in the expertise and leadership of professionals who are trained to identify, prevent, mitigate and support the control of risks to the entire organization.

Following is one example of how ORM’s work directly impacts Veterans. Physicians are required to code patient services. With current workloads there are several coding errors creating monetary losses to VA, hindering the path to high reliability. Having internal controls, along with oversight and accountability in place, can reduce these issues. And when they do occur, Integrity and Compliance Officers (ICO) can help alleviate the problem, such as a situation where a Veteran almost lost his home due to billing issues. The ICO worked

with the appropriate offices to help the Veteran save his home and correct the errors.

Other examples from CBI include:

- **Preventable Third-Party Claims Denials.** Fiscal year to date, corrective action was taken on more than 94,000 claims, which were rebilled. Approximately \$32 million was collected as a result (value added). A total of 87,191 Veterans were impacted.
- **Inaccurate Veteran Copay Debts.** Fiscal year to date, more than 420,000 inaccurate bills have been cancelled. Over 72,000 Veterans have received account credits totaling over \$7.1 million.
- **Preventable Reasons Not Billable (Unbillable Encounters).** Fiscal year-to-date, corrective action was taken on 4,280 clinical encounters, resulting in about \$1.7 million in collections (value added), impacting 2,724 Veterans.

Bringing oversight, risk, ethics and compliance into strategic decisions from the beginning allows VHA to enable growth while also mitigating risks. Ensuring that leadership is involved in communicating the important of the focus areas mentioned above, where employees can find guidance and who to reach out to for support is essential as well.

HOW THE PANDEMIC HAS CHANGED THE WAY WE WORK

We’ve all faced challenges, both personally and professionally, that have dramatically changed the way we’ve lived and worked during the past year. The recent one-year anniversary of the global shutdown brought on by the coronavirus pandemic offers a reminder of the challenges we’ve faced. But it is also a reminder of the resilience we’ve shown.

Each of the five program offices within the Veterans Health Administration (VHA) Office of Risk Management (ORM) stepped up and overcame unique challenges over the last year. The steps each took to maintain their effort at a very high level despite the pandemic follow.

“I am proud of the great work that is being done throughout ORM and am invigorated to see the passion and dedication of our staff as they continue to work diligently to improve Veteran care and carry out VHA’s mission,” says Erica Scavella, MD, FACP, FACHE, Associate Deputy Under Secretary for Health for Risk Management (10ORM).

COMPLIANCE AND BUSINESS INTEGRITY

The Office of Compliance and Business Integrity (CBI) is responsible for promoting a system-wide culture of integrity at VHA. Through the work of Integrity and Compliance Officers, CBI promotes and implements a consistent framework at facilities, Veterans Integrated Service Networks (VISN), Consolidated Patient Account Center (CPAC) and program offices to address non-ethical and non-compliant behavior.

CBI made a number of changes to its work this past year in response to the coronavirus pandemic. Both their Code of Integrity Campaign and their Compliance and Ethics Week initiatives were transformed from face-to-face events to entirely virtual ones. The office also shifted the theme of the Code of Integrity Campaign to focus on “Integrity during a pandemic.” It took this step to better support the work and compliance concerns being experienced in the field during this time.

HOW THE PANDEMIC HAS CHANGED THE WAY WE WORK

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All live trainings and conferences were also converted to a virtual format. This change opened attendance to a wider audience, allowing CBI to reach more people than they could in previous years. The move also increased the impact of the events – an unexpected benefit of the current situation. The audit team also brought back an updated version of the Telephone Encounters Audit tool to support virtual doctor appointments, a change which has been truly appreciated by the field.

The pandemic has allowed CBI to reassess where they are, where they need to be and how they can best help their front-line officers. Overall, the staff at CBI feels that they have grown and become a stronger support team than they were prior to this year.

INTERNAL AUDIT

Internal Audit (IA) provides independent and objective assurance to strengthen the value, quality and reliability of health care and Veteran trust and to improve VHA operations with external and internal auditors, inspectors and investigators.

Like many of the ORM program offices, a large part of IA's work involves field visits, which have transitioned to virtual visits in the current environment. For example, IA was not able to go into the field for its breast cancer screening audits, so team members conducted reviews of medical documentation remotely instead. IA also needed to change how the Audit, Risk and Compliance Committee (ARCC) operated. The office implemented effective and efficient meetings remotely with Microsoft Teams technology so governance activities could continue without delay.

IA is now also more flexible with the types of activities their team conducts. IA is not limited to performance audits, which had required field visits, but now also performs non-audit services or collaborative advisory services to help improve other offices' operations and functions. This allows IA staff to continue to work remotely while still adding immense value to VHA programs and offices.

THE MEDICAL INSPECTOR

The Office of the Medical Inspector (OMI) is responsible for investigating concerns raised by whistleblowers and Department of Veterans Affairs stakeholders in order to monitor and improve the quality of services provided by VHA. The investigative teams that OMI assembles to assess and report on these potential issues would typically conduct

on-site visits. However, during the coronavirus pandemic OMI was faced with the daunting challenge of completing its mission in the face of a travel moratorium.

OMI's first step was organizing a strategy to triage incoming referrals and determine the order of precedence once the moratorium was lifted. Led by the Medical Inspector, OMI established a board and criteria to organize and rank the referrals based on violation of law, rule or regulation; gross mismanagement; gross waste of funds; abuse of authority; or substantial and specific danger to public health or safety. The next step was to determine which referrals required an immediate response, followed by an assessment of which referrals required an in-person visit and which could be investigated virtually. Since the start of the pandemic, OMI has conducted seven on-site visits and 33 virtual visits to date.

The second obstacle was the submission of OMI's reports of investigation to VHA/VA leadership for signature. Pre-pandemic, a paper folder system was the standard. OMI has since created a robust proposal to move to a paperless process using SharePoint and VIEWS, which will be beneficial to the success of the office's work both now and in the future.

NATIONAL CENTER FOR ETHICS IN HEALTH CARE

The National Center for Ethics in Health Care (NCEHC) is responsible for addressing the complex ethical issues that arise in patient care, healthcare management and research across VA. NCEHC provides information, education and consultation and oversees nationwide programs and quality improvement projects to help healthcare practitioners and administrators understand and apply healthcare ethics standards. NCEHC also provides information to Veterans and their loved ones to help them understand ethical issues that relate to their healthcare experience.

Through consultations, presentations and other targeted communications, NCEHC has been working tirelessly to engage with stakeholders and promote the ethical treatment of Veterans throughout the course of the pandemic. In Q1 of FY21 alone, NCEHC held COVID-19-specific presentations for a variety of audiences, reaching close to 2,000 attendees. NCEHC has also addressed ethical aspects of national VHA policy and procedures in areas such as vaccine prioritization, the allocation of scarce medical resources and mask wearing.

HOW THE PANDEMIC HAS CHANGED THE WAY WE WORK

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RESEARCH OVERSIGHT

The Office of Research Oversight (ORO) monitors, reviews, and investigates matters of compliance that involve VA research. Specifically, ORO provides oversight of compliance with VA and other federal requirements for the protection of human research subjects, laboratory animal welfare, research safety, research laboratory security, research information security and research misconduct. ORO also provides training to facility Research Compliance Officers (RCO) and oversight of RCO auditing programs.

Prior to the coronavirus pandemic, ORO team members who engaged in compliance and technical assistance activities routinely travelled to conduct investigations, site reviews and educational activities. Due to the flexibility and creativity of

the ORO team, the office was able to quickly and effectively transition its site review and technical assistance formats so that these activities could be conducted virtually. For facilities with smaller and less complex research programs, ORO conducted broad programmatic reviews via virtual site visits. For higher risk issues, the office conducted focused limited scope reviews and leveraged greater use of communication platforms that facilitate live in-person information exchange.

ORO also recently piloted use of portable video technology to conduct virtual walk-throughs of research laboratories and an animal research facility. Despite the challenges that the pandemic posed, ORO was able to conduct “business as usual” to ensure the continued safety and success of VA research activities.

ORM SNAP SHOTS: IMPORTANT ANNOUNCEMENTS/INFORMATION

ORM ALL EMPLOYEE SURVEY RESULTS

Thank you again for your participation in the All Employee Survey (AES). We are thrilled by the amount of survey responses received. ORM is proud to announce high levels of satisfaction and positive feelings toward our offices, leadership and the great work we do.

The [full AES results can be viewed here](#).

ORM TOWN HALLS

The next ORM Town Hall is approaching soon! We loved seeing and hearing from you all at the past two Town Halls. If you were unable to attend, the past Town Halls can be viewed on SharePoint at the links below.

- [December Town Hall](#)
- [January Town Hall](#)

ORM PLAYER CARDS

We are one big ORM family. The re-organization has allowed

our offices a greater opportunity to join forces to work better, smarter and continue the important oversight, risk and ethics work we do for VA. Whether you are working with new colleagues or collaborating with familiar ones, the ORM player card is a fantastic way to learn about your new and old colleagues and how you can best work together!

If you haven't already filled out your player card, please complete it now. Player cards [can be found here](#).

HEALTH AND WELLNESS EVENTS

We help care for our Veterans every week, but are you taking care of you? In this virtual environment it is easy to get caught up in feelings of anxiousness and loneliness, needing to feel available 24/7 and not taking the time to get outside and exercise. VA has many Health and Wellness events available to employees and encourages you to prioritize their health, just as we prioritize the important work we do for Veterans.

For Health and Wellness events, [click here](#).

VA



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Thank you for reading *CONNECTION*. Have any ideas about how we can make the newsletter even better? Are there topics or individuals you want to hear more about? Send us an email: oreteamdis@disconsulting.com.