



LETTER FROM THE CHIEF

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Associate Deputy Under Secretary for Health*

Dear Colleagues,

I don't know about you, but I can sometimes get so caught up in day-to-day details that I lose sight of the big picture. This can be true at home or in relationships with friends or family. It certainly happens when raising children! And it can happen at work—where it's easy to get focused on accomplishing daily, weekly or monthly tasks—and hard to remember that what we do as Team ORE has direct impacts on our colleagues in the field, and on Veterans' lives.

The theme of this issue of CONNECTION is "ORE's Impact in the Field," and I'm so glad we are taking time to notice and discuss how our work waterfalls down to VHA as a whole, making a real, positive impact.

As you know, the Office of the Medical Inspector (OMI) is focused on responding to issues from Veterans and other stakeholders in order to ensure quality throughout the VHA system—for patients, staff and visitors. Once, when our investigators were alerted to problems with an emergency paging system at a VA medical facility, they ended up finding and solving a much bigger issue. As they examined glitches with the paging system, investigators discovered an inoperative fire alarm system. Their ability to identify and remedy this problem had a direct impact on the lives of everyone at that medical facility.

HOW DOES ORE'S WORK AFFECT THE FIELD?

Every day, VHA leaders are faced with questions about the efficacy, efficiency and overall success of VHA programs. They evaluate program objectives, project outcomes and policy situations, asking questions like:

"Is this an issue that is going to become a bigger problem?" "Are we following the correct rules and protocols?" "Are our services

available to all Veterans in an ethical and equitable way?"

Throughout the next few newsletters, we're going to examine how the Office of Oversight, Risk and Ethics (ORE) answers day-to-day questions like these with practical application in the field. This month, we will highlight Internal Audit (IA) and the Office of Research Oversight (ORO).

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This newsletter is a quarterly publication of the Veterans Health Administration Office of Oversight, Risk and Ethics (ORE).

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

Fresh eyes offer the opportunity to find these kinds of risks to patient safety.

There isn't room on this page to explain how each ORE office makes an impact in the field—so I encourage you to look at the centerpiece article in this issue of CONNECTION, "How Does ORE's Work Affect the Field?"

I also encourage you to take a moment today to step back from your pressing work in order to look at the big picture of what we—as Team ORE—achieve, big-picture, VA-wide, in support of Veterans and employees. Even when your work is frustrating or challenging, you are helping VA meet its mission to provide top-tier care to Veterans..

HOW DOES ORO'S WORK AFFECT THE FIELD?

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INTERNAL AUDIT—WORKING TO IMPROVE BREAST CANCER SCREENING PROGRAMS

Internal Audit (IA) worked with the VHA program offices and medical centers that lead efforts in Breast Cancer Screening programs to perform two separate audits of screenings done by VHA and community providers. Through observation and medical records research, IA helped these stakeholders identify potential challenges that could cause delays in VHA's ability to achieve the full scope of care coordination. IA identified a few cases with potential gaps in care coordination and immediately shared this information with Women's Health Services for follow-up to ensure that the appropriate next phase in care occurred on all cases reviewed.

IA made a total of 16 recommendations for both the Community Care Breast Cancer Screening Program and VA Care Coordination for Breast Cancer Screening Program. A working group with key stakeholders, including the National Radiology Program Office, Women's Health Services, the Office of Community Care and a limited number of Network and Medical Center Directors was formed to address these recommendations.

The working group plans to implement all 16 recommendations by Fall 2021, less than one year after IA made the recommendations. All those involved have moved swiftly to address the recommendations. Their actions resulted in a national standard that helps ensure Veterans' medical records reflect suspicious screening results. This successful cross-program collaboration provided an opportunity for IA's work to be visible to additional offices, and they are now working with the National Gastroenterology and Hepatology Office on an engagement focused on Colonoscopy Quality Metrics Documentation.

REDUCING SITE VISIT BURDEN THROUGH COMBINED PROGRAM REVIEWS

With the Combined Program Review format, the Office of Research Oversight (ORO) has achieved a 35% reduction in total on-site compliance site visits.

Prior to 2016, each of ORO's compliance compliance-focused workgroups commonly conducted separate site visits to proactively evaluate the different research oversight program areas within a VA facility.



Previous format: Site visits that proactively reviewed a limited number of research oversight program areas at one time; correspondingly, accomplishment of reviews of all of a facility's research oversight program areas involved multiple cases, ORO points-of-contact, reports, remedial action plans, and interview and document requests.

Understanding that multiple visits from ORO, as well as other VA and VHA entities, is burdensome for facility personnel, ORO reevaluated their site visit model and implemented a streamlined "Combined Program Review" format allowing for all research oversight program areas at a facility to be reviewed in a single site visit by an interdisciplinary team made up of members from ORO's various compliance workgroups.



Current format: Site visits that proactively review all research oversight program areas at one time; correspondingly, accomplishment of reviews of all of a facility's research oversight program areas involves a single ORO case, ORO point-of-contact, report and remedial action plan, along with consolidated interviews and document requests.

Our next issue will feature stories from the Office of Integrity and Compliance (OIC) and the National Center for Ethics in Healthcare (NCEHC).

Q&A WITH IA

Doris Stieferman is the Acting Chief Audit Executive in the Office of Internal Audit (IA)

Q. WHEN WE HEAR “AUDIT” WE MAY IMAGINE PEOPLE WITH CLIPBOARDS WALKING AROUND, TAKING STOCK. BUT THAT’S NOT QUITE WHAT VHA’S OFFICE OF INTERNAL AUDIT DOES. WHAT DOES INTERNAL AUDIT DO?

Doris: Yes, we are not what people traditionally think of when they hear the word “audit.”

First and foremost, we are here to be a resource to help address those areas that keep VHA leadership, managers and employees up at night. We help medical centers, VISNs and program offices identify vulnerabilities and recommend solutions before those vulnerabilities become bigger problems.

When we work with our stakeholders, we ask them: Is there a process that isn’t working well, or could work better? Are there internal controls established and are they working? Are there regulations, standards, directives or processes that VHA must follow that you need to make sure are being followed?

We then review these areas and help identify gaps or blind spots. Our goal is to help VHA address internal issues before they become an inspector general report or headline news. And most importantly, help our employees provide world-class and timely care to our Veterans. We are on the same VHA team and share the same goal.

Q: TELL ME MORE ABOUT THE WORD AUDIT? HOW IS WHAT YOU DO DIFFERENT FROM OTHER TYPES OF AUDITS, LIKE A FINANCIAL AUDIT OR AN AUDIT FROM THE OFFICE OF INTEGRITY AND COMPLIANCE?

The audits we conduct are distinct from those that are typically used in VHA and most sectors. We conduct our audits using a very specific framework of standards, which are documented in the Yellow Book, published by the Government Accountability Office, (GAO).

Q: IF YOU ARE ASSIGNED TO WORK WITH A VHA PROGRAM, HOW DOES IT WORK? HOW DOES IA HELP?

Our IA Team is a free and independent resource to identify gaps and areas that may become problems. Another benefit is

“First and foremost, we are here to be a resource to help address those areas that keep VHA leadership, managers and employees up at night.”

that we bring fresh eyes and an impartial perspective. We are able to make improvement recommendations while program staff continues their day-to-day tasks, but staff also has a voice in what we are looking at.

Our team brings expertise in audit standards, clinical care, internal controls, statistics and data analysis. And we bring this expertise and alternate perspective at no additional cost to a program.

Q: CAN YOU TELL US ABOUT A SUCCESSFUL EXPERIENCE WORKING WITH A VHA PROGRAM?

One example is how we worked with VA teams to bring safer pain management to Veterans to help fight the opioid crisis.

In 2020, an IA team conducted an audit to validate VA Medical Centers’ compliance with the requirements established by the Comprehensive Addiction and Recovery Act (CARA) of 2016 and by the VHA Pain Management Team (PMT) Memorandum (May 2017). We surveyed 140 medical facilities and visited several for observations. The IA team made the following recommendations to the Under Secretary for Health: 1) Establish a program office for Pain Management to oversee compliance with CARA, 2) Update Directive 2009-053, Pain Management and 3) Ensure establishment of a fully designated PMT at all VA Medical Centers requiring a PMT.

Because of the recommendations in our report, VHA established a Pain Management Program Office to oversee the establishment of uniform PMTs in all VAMCs. The revised Directive is being routed through the approval process, with anticipated closure this summer. Action on the third recommendation is also rapidly progressing—guidance, funding and hiring for field program implementation should be complete. The expansion of PMTs enables the facilities to provide superior pain management to our Veterans and better manage high risk opioid prescriptions.

Q: WHAT ELSE SHOULD PEOPLE KNOW ABOUT IA?

We truly want to make it easier for VHA employees to serve

Q&A WITH IA

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Veterans. We don't go into an engagement with a punitive, or "gotcha" mindset. We bolster your staff and with your input, help pinpoint areas that could become public concerns, and together, come up with solutions.

We encourage you to contact us if there is something keeping you up at night, something that you know might grow into a

bigger problem and could be harmful to VA and the Veterans we serve. We can help you navigate whether using IA is the right approach, or we can point you in the right direction.

If you'd like to know more, email us at VHA10IAInternalAuditAction@va.gov.

OIC'S FRAUD, WASTE AND ABUSE (FWA) AWARENESS CAMPAIGN EARNS MORE THAN 800,000 ENGAGEMENTS

Over the past year VHA has seen an increase in fraud, waste and abuse activities—some seen many times before and some that were new to VHA because of the pandemic. This unprecedented time has provided learning opportunities and awareness on how to manage FWA across the organization.

Throughout the summer, the Office of Integrity and Compliance (OIC) mobilized their "boots on the ground"—Integrity and Compliance Officers (ICOs) to partner with local directors, PAOs and key advocates to educate VHA employees and Veterans on how to identify and report FWA. The campaign's biggest impact was an increased understanding of how fraud, waste and abuse impacts Veteran care. By preventing FWA throughout the VHA system, we can work together to make sure resources are dedicated to Veterans as intended.

The awareness campaign recently received the Best Practice Award from the Health Ethics Trust. This effort resulted in an increase in reporting suspected FWA to both OIC and to the Office of the Inspector General (OIG), and an increase in the quality of reporting. Reports are now more actionable by both OIC and OIG professionals.

This communications effort used a three-pronged approach:

- **Brand Ambassadors:** Equipped ICOs as "Brand Ambassadors" across 135 VISNs and VAMCs with a toolkit of materials and a Six Step guidance to contribute to the campaign. The 135 ICOs from VISNs and VAMCs who participated in the awareness campaign didn't just contribute to the numbers, they also became more visible at their locations and accessible to employees.
- **Speaking Circuit:** Engaged in a Speaking Circuit by ICO team members, who appeared in 17 calls with key leadership groups around VHA, ranging from clinical professionals, VISN Deputy Directors, program managers

and more. Nearly 2,500 people participated in these calls, where they were encouraged to share the FWA materials with their entire staffs and colleagues.

- **Internal VA Communication Channels:** Published materials in VA communications outlets, ranging from VA's Vantage Point blog to VA Insider to internal newsletters reaching niche program specialists.

In addition, OIC built and expanded partnerships with other VA offices concerned with compliance, including Veterans Benefit Administration (VBA), Office of the Inspector General (OIG), public affairs officers (PAOs), who helped execute the awareness campaign through their own communication channels, and more.



Fraud, waste, and abuse undermines Veteran Care.

Together, we can make a difference.

Local ICOs showed their creativity and enthusiasm in customizing the campaign. ICO Christina Baker at the Fort Harrison, Montana VAMC reported an FWA spirit week with FWA theme days and an FWA puzzle challenges sent to 1,300 employees. Several ICOs developed quizzes to challenge employees' understanding of FWA and increase interaction. Many ICOs found a warm welcome in presenting FWA materials to groups spanning the full range of VHA employees,

OIC'S FRAUD, WASTE AND ABUSE (FWA) AWARENESS CAMPAIGN EARNS MORE THAN 800,000 ENGAGEMENTS

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such as Geriatrics and Extended Care, Logistics, Senior Leaders, New Employee Orientations, Virtual Town Halls, Procurement, Community Care, Environmental Management Services, Social Work and many more.

"I'm extremely pleased with the way our Integrity and Compliance Officers and VA leaders have engaged with the Fraud, Waste and Abuse awareness campaign," said Tracy Davis-Bradley, Ph.D., Executive Director of the Office of Integrity and Compliance (OIC). "The ICOs embraced this awareness campaign, took the materials we provided and made it their own. This campaign—and ongoing education FWA education efforts—will significantly improve our ability to address fraud, waste and abuse throughout VHA, which allows us to better focus resources on Veteran care."

For this decentralized communications approach, OIC developed a toolkit of communications materials that leaders and ICOs could use in raising FWA awareness. This toolkit allowed OIC to maintain consistent messaging throughout the campaign at more than 135 VHA locations. The toolkit included: presentation slides, graphic design materials,

BY THE NUMBERS

- 804,909 total engagements
- 135 VISNs/VAMCs participating
- 71,502 presentation attendees
- 384,994 employees read Director emails
- 252,085 staff received newsletter articles and facility-wide messages
- 86,880 Facebook followers reached
- 9,448 YouTube Views

newsletter article templates, email templates for Directors to send to their staff, social media materials, videos, and more.

Interested in learning more about the FWA awareness campaign? You can [review the campaign materials on SharePoint](#).

DR. TRACY DAVIS BRADLEY NAMED EXECUTIVE DIRECTOR OF OIC

Tracy Davis Bradley, Ph.D., has been appointed the Executive Director of the Office of Integrity and Compliance (OIC). In this role she is responsible for providing enterprise-wide leadership, service, support and oversight of compliance, risk management, oversight and integrity activities throughout the VHA. Dr. Davis Bradley also serves as VHA's Deputy Designated Ethics Official.

"Tracy's work over the last 3 years has made a significant impact in integrity and compliance at VHA," said Dr. Erica Scavella, Associate Deputy Under Secretary for Health. "Her passionate, innovative approach will continue to improve our ability to target resources for Veteran care, and I look forward to continue working with Tracy to further strengthen VHA's compliance, integrity and oversight programs."

"I am honored to accept this appointment and continue working with the OIC team and our Integrity and Compliance Officers in the field toward an effective integrity and compliance program throughout VHA," said Tracy Davis Bradley, Ph.D. "Building a Culture of Integrity throughout VHA enables all employees to understand the 'right thing' to do and focus resources on our key mission: serving Veterans."

Dr. Davis Bradley joined the Veterans Health Administration as Deputy Executive Director of OIC in 2018 after more than 20 years in academia and as a consultant for private and public sector organizations in the areas of risk management, compliance program management, building a culture of integrity and organizational change. She is a published thought leader in integrity, compliance and risk. Her work has been featured in *Harvard Business Review*, *BusinessWeek*, *Risk Management Magazine*, *NYSE Magazine* and *Corporate Secretary*.



She has served on numerous boards of directors, including the University of California Board of Regents, UCLA Alumni Association and UniCamp. She attended UCLA for her B.A. in Anthropology, as well as her M.A. and Ph.D. in Higher Education and Organizational Change. Dr. Davis Bradley lives in the Washington, D.C. area with her husband and two children.

Dr. Davis Bradley began her appointment on August 1, 2021.

OFFICE OF INTEGRITY AND COMPLIANCE WINS TWO BEST PRACTICE AWARDS FROM HEALTH ETHICS TRUST

Congratulations to the Office of Integrity and Compliance (OIC) on winning two Best Practice Awards from the Health Ethics Trust. OIC also earned this award last year for th Integrity in a Pandemic communications campaign.

RISK MANAGEMENT TRANSFORMATION

OIC has matured and transformed their risk management efforts across the organization to better meet the needs of key stakeholders through standardizing risk management practices, increasing risk awareness and education, and streamlining risk reporting. OIC built and deployed the OIC Risk Management Portal to allow for enhanced data collection, reporting and visualization through a streamlined system solution. This occurred in tandem with the programmatic efforts to revamp the VHA OIC policy with more specific risk management roles and responsibilities for Integrity and Compliance Officers (ICOs), risk owners and business process owners, as well as clarifying the expanded oversight of OIC to include broader business risks in the organization. The OIC Risk Management Portal provided a “one stop shop” for users and better positioned OIC to report emerging risks across the organization. Ultimately, this uniquely addressed the needs of VHA so that ICOs’ risk management efforts are automated, documented, standardized and reportable.

Instrumental to the development of the OIC Risk Management Portal was using PowerApps web application. OIC was able to take advantage of enterprise licenses for systems already in use within VHA versus buying an off- the-shelf system that would require significant customization.

The OIC Risk Management Portal has already demonstrated key successes in 2021. OIC’s efforts to collect risk assessment, response and monitoring information and allow for data reporting. The automated process has allowed for more efficient and effective data collection and analysis. The data visualization allows for the analysis to be trended over time and key themes to be identified, which, in-turn, create a more risk-informed culture. VHA OIC also can quickly identify mature risk programs and lend support to those that require assistance with maturing their risk management processes. Numerous key stakeholders across multiple levels of management have been able to view risks and risk responses locally, regionally and nationally and determine opportunities for further collaboration and integration with their colleagues. The portal can also be replicated across other organizations that may have disparate risk management activities and see the opportunity for a more standardized solution for data collection and reporting.

FRAUD, WASTE AND ABUSE AWARENESS CAMPAIGN

Read more on this campaign in its own section of the newsletter. Using existing communications channels and Integrity and Compliance Officers onsite at more than 135 VHA facilities, OIC accomplished more than 809,000 communication engagements with VHA staff and Veterans. The campaign focused on building an understanding of FWA and how to report it through proper channels.

IMPORTANT ANNOUNCEMENTS

ORE TOWN HALL

ORE town halls provide our team with the opportunity to share, learn and celebrate each other in and out of the office. Thank you to everyone who joined the September ORE Town Hall last week. We had around 97 employees join us for two hours of discussion, feedback and celebrating. For those who attended, please remember to take the [ORE Town Hall Feedback Survey](#).

If you missed it, you can access the [September Townhall Recording on the ORE SharePoint](#).

Our next ORE Town Hall is scheduled for January 13, from 11am–12:30pm ET. Please be on the lookout for a calendar invitation from [Alfreda Holmes](#). We hope to see you there!

BETTER TOGETHER CONVERSATIONS

The ORE Better Together Conversations series has been going strong for four months now! Launched in June 2021, on the second Wednesday of each month, the ORE Better Together Conversations bring together employees across all ORE program offices for a 30-minute informal discussion to help build a collective and collaborative community within our office.

IMPORTANT ANNOUNCEMENTS

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We have had great participation so far and we encourage you to join or continue joining our ORE Better Together Conversations.

Previous Better Together Conversation Session Themes:

- Working from Home in a New Normal (June 2021)
- Meet the People in your ORE Neighborhood (July 2021)
- If Only I'd Known: Insights to Working at VA (August 2021)
- Ask the ADUSH Anything (September 2021)

The next Better Together Conversation will be held on Wednesday, October 13, at noon ET. If you need the calendar invitation for the series, please [contact Alfreda Holmes](#).

We look forward to seeing you at the next Better Together Conversation session!

BETTER TOGETHER CONVERSATION TESTIMONIALS

"I am new and entirely virtual so it's nice to put faces to names and learn about other staff"

"I liked that Dr. Scavella led this meeting. Liked that you surveyed staff before the meeting and shared the answers."

"Great job! Continue the great work to connect ORE!"

"Although it a great forum, it may take some time for attendees to get out of their shells and feel it is a safe environment to express oneself. So please continue the great work."

"I tried out the website that Christy shared and it was fantastic! I wish I knew about it a long time ago."

ORE PROGRAM OFFICE VIDEOS

[Office of Internal Audit: Addressing the Issues that Keep VHA Leaders Up at Night](#)

Dr. Erica Scavella and Doris Stieferman discuss how VHA's Office of Internal Audit helps medical centers, VISNs and program offices identify blind spots and address them before they become a public issue.

[Office of Integrity and Compliance: Building a Culture of Integrity](#)

Dr. Erica Scavella and Dr. Tracy Davis Bradley introduce the Office of Integrity and Compliance (OIC) and explore what it means to have a culture of integrity.

SAVE THE DATE: TWO IMPORTANT COMMEMORATIONS

ORE is leading the effort for two VHA-wide commemorations this year. Please mark your calendars and look for more information on how you can support both of these important opportunities to educate VA employees and Veterans on ORE services and initiatives.

- **Risk Awareness Week:** October 25–29
- **Compliance and Ethics Week:** November 8–12

VA



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Veterans Health Administration

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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.