



DEPARTMENT OF VETERANS AFFAIRS
Office of the General Counsel
Washington DC 20420

FEB 29 2012

In Reply Refer To:

The Honorable Carolyn N. Lerner
Special Counsel
U.S. Office of Special Counsel
1730 M. Street, N.W. Suite 300
Washington, DC 20036-4505
Attn: Catherine A. McMullen, Chief, Disclosure Unit

Re: OSC File No. D1-11-2679 and D1-11-2798

Dear. Ms. Lerner,

This is in response to the e-mail requests on January 20 and February 14, 2012, from Ms. Siobhan Smith of your staff for additional information to supplement the Agency's response to allegations reported by an employee/Veteran and the employee's supervisor at the Department of Veterans Affairs Boston Healthcare System (VABHS), Brockton Division (Brockton), Business Office, Brockton, Massachusetts (OSC File No. D1-11-2679 and DI-11-2798).

Specifically, your office asked for VA's response to the Whistleblowers' contention that the subject employees' policy rationales for accessing the Whistleblower's records appeared to be pre-textual, based specifically on the assertions by the Whistleblowers that no such policies were in place at the time. You also asked us for additional information and clarification on how or why the access the subject employees stated was for Urgent Care visits do not match up with the dates the Whistleblower actually visited Urgent Care. You further asked VA to provide additional information regarding the current status of the disciplinary action mentioned in the report.

Enclosed are the position descriptions for the Patient Services Assistant (PSAs) and Administrative Officer of the Day (AOD), which include a description of the general duties performed on a regular basis. Additional tasks are assigned by the supervisor either verbally or electronically. The AOD compiles the information collected by the PSAs for use in the Director's Daily Log. The employees working the off-shifts tend to be assigned more special projects due to the availability of time. Also included in the documents are references to the Privacy Act of 1974.

Although the positions are clerical in nature, there is significant patient medical information the employee needs to know in order to perform the duties of the position. For instance, they may need to order an ambulance or arrange for chair car

2.

The Honorable Carolyn N. Lerner

transportation, admit the patient, and schedule future appointments. Medication reconciliation, daily log and disposition of the patient are standard duties. The employees are trained to perform these duties in, typically, about a 2 to 3 week training period. The duties are in the position description and more generally in a performance plan.

On occasion, employees are assigned special data related projects that require access into patient records on days the patients do not have appointments. For example, the Urgent Care Project included medical progress note and ancillary services reviews to determine if all procedures were documented appropriately for billing purposes. For more than a year, these reviews were completed for the prior month and were part of an ongoing retrospective review for workload capture and revenue generation. Some examples may include: reviewing progress notes for insured Veterans seen in urgent care to capture billable cases and special analysis to capture workload and revenue for ancillary procedures (EKG, Injections, etc.).

In the time period covered by the complaint, the daily log at Brockton prepared for the Director included only the evening/overnight period of 4pm – 8am. The Whistleblower would not have been part of that log since she was seen during the day tour. Since that time the Medical Center has moved to a 24 hour daily log, but that did not occur until October 19, 2010. As noted by the Whistleblower, she was seen in Urgent Care at Brockton on December 15, 2009, July 14, 2009 and July 29, 2010 and interacted with employees who accessed the whistleblower's medical record. The employees had valid reasons for accessing the medical record.

Related to the specific dates of inquiry, entry into the medical records by the named employees was for the following purpose(s):

Date of access	Purpose for access
9/22/2009	To review progress note, labs, doctors orders in the Computerized Patient Record System (CPRS) for supervisor-authorized Urgent Care/Cost Recovery project
12/11/2009	Whistleblower requested named Employee to access the Whistleblower's medical record
7/17/2009	Whistleblower checked into Urgent Care

VABHS has taken corrective action concerning the named Employee who violated VABHS's Privacy Policy. The individual received a proposed reprimand. On January 5, 2012, the deciding official mitigated the penalty to an admonishment and

3.

The Honorable Carolyn N. Lerner

required the named employee to undergo Privacy retraining. The following factors were considered in the decision to mitigate: the named Employee had no prior disciplinary action; there were no further instances by the named Employee during the 1 year since the original occurrence; and the past performance of the named Employee during a 7 year career at VABHS, which included multiple performance awards and special contribution awards.

VABHS also has reassessed its processes and put a corrective plan in place to move forward. Approximately 24 percent (and rising) of VA's employees are Veterans, many of whom receive clinical care at VABHS. It is a regular occurrence for an employee's "sensitive" record to be accessed as part of the processes for check-in, billing and auditing. Similar instances throughout the medical center include filling prescriptions, laboratory and radiology services. With the current parameters of the computer software, it is not feasible to exclude employees who are Veterans from the multiple reports generated to conduct the business of the Medical Center.

Currently, all employees are required to participate in annual Privacy and HIPPA training. VABHS has directed its Privacy Officer to develop, by February 29, 2012, a focused training for employees who access clinical and appointment records, including electronic records. The training will concentrate on the specific Privacy needs of employees who are Veterans receiving care at VABHS. In addition, VABHS has directed its Information Security Officer, starting February 1, 2012, to conduct regular audits of access to records of employees who are Veterans to validate the appropriate business need for access.

If you have any questions about this supplemental information, please contact Sharon M. Johnston in the Office of General Counsel at 202-461-7658.

Sincerely yours,



Walter A. Hall
Assistant General Counsel

Enclosures

JOB DESCRIPTION (Please Read Instructions on the Back)

1. Agency Position No. **8157**
 6. OFPM Classification No.

2. Reason for Submission: Reestablishment New Other

3. Service: Home Field

4. Employing Office Location: **VAMC Brockton / West Roxbury**

5. Duty Station

7. Fair Labor Standards Act: Exempt Nonexempt

8. Financial Statements Required: Executive Personnel Financial Disclosure Employment and Financial Services

9. Subject to IA Action: Yes No

10. Position Status: Competitive Excepted (Specify in Remarks) SES (Gen.) SES (SR)

11. Position Act: Supervisory Managerial Member

12. Sensitivity: 1 - Non-Sensitive 2 - Minimal Sensitive 3 - Critical Sensitive

13. Competitive Level Code: **X13**

14. Agency Use

15. Classified/Graded by	Official Title of Position	Pay Plan	Occupational Code	Grade	Issue	Date
a. U.S. Office of Personnel Management						
b. Department, Agency or Establishment						
c. Second Level Review						
d. First Level Review	PATIENT SERVICES ASSISTANT	GS	303	6		10/21/97
e. Recommended by Supervisor or Initiating Office	Emergency Room Care Coordinator	GS	303	6		

16. Organizational Title of Position (if different from official title)

17. Name of Employee (if vacant, specify)

18. Department, Agency, or Establishment: **Department of Veterans Affairs**

19. Total Subdivision: **Medical Administration Service**

20. Fourth Subdivision: **Ambulatory Care and Processing section**

21. Second Subdivision: **Administrative Services**

22. Fifth Subdivision

23. Employee Review - This is an accurate description of the major duties and responsibilities of my position.

Supervisory Certification: I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.

a. Typed Name and Title of Immediate Supervisor: **Colleen Copeland, Asst. Chief Ambulatory Care and Processing Section**

b. Typed Name and Title of Higher-Level Supervisor or Manager (optional): **Jaqueline Andrews, Program Manager Medical Administration Service**

Signatures and Dates:

Colleen Copeland: *Colleen Copeland*, 9-3-97

Jaqueline Andrews: _____, _____

21. Classification/Job Grading Certification: I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.

22. Position Classification Standards Used in Classifying/Grading Position: **GS 303 from 1977**

Typed Name and Title of Official Taking Action: **MARIA COMAGNON**

POSITION CLASSIFICATION SPECIALIST

Signature: *Maria Comagnon*, Date: **10/21/97**

Information for Employees: The standards and information on their application, are available in the personnel office. The classification of the position may be reviewed and corrected by the agency or the U.S. Office of Personnel Management. Information on classification/job grading appeals, and complaints on exemption from FLSA, is available from the personnel office or the U.S. Office of Personnel Management.

22. Position Review	Initials	Date								
a. Employee (optional)										
b. Supervisor										
c. Classifier										

23. Remarks

25. Description of Major Duties and Responsibilities (See Attached)

Emergency Room Care Coordinator - GS-363-6
Health Benefits Advisor - Patient Services Asst.

Major Duties:

Provides advisory and technical assistance with regards to eligibility for Inpatient/Outpatients/ER and Non-Vet Humanitarian treatment as well as other special programs (i.e. Environmental Health Care, Agent Orange, Persian Gulf, POW, Beneficiary Travel, Dental, CHAMPVA (Civilian Health and Medical Program of Veterans Administration), Primary Care, and MCCR (Medical Care Cost Recovery). In addition to technical advice, all administrative processing associated with provisions of emergency room care as well as DHCP (Decentralized Hospital Computer Programs) knowledge is required.

Must be aware and exhibit sound judgment and quick decisions in recognizing the applicant who may be in a medical emergency which would require immediate medical evaluation and treatment. The incumbent notifies medical staff when potentially serious medical complaints are identified. After emergency treatment is initiated, will personally oversee or perform necessary medical administrative processing. Obtains/orders lab through DHCP and x-ray results (either STAT or routine requests) and gives to clinician immediately. Produces Medication List for patients to be seen. Provides secretarial coverage for ER staff by answering/screening calls, pages, taking messages and ordering clerical supplies.

Incumbent is expected to accomplish comprehensive processes including usage of DHCP, administrative problem resolutions, entering and extracting data, procedural development, etc. Must maintain strong interpersonal skills while providing good customer relations with veterans, clinical staff, and beneficiary representatives, who may present in person, call, or submit requests in writing.

Makes determinations regarding eligibility for medical care by various means. Is familiar with government documents, such as DD214, HHCQ, Award Letters, contents and format of medical records, and is able to determine which medical care benefits the patient is eligible for based on appropriate VA Regulations, Law, Policies, and Guidelines. If patient is ineligible for medical care benefits, incumbent counsels patient to that effect diplomatically, professionally, and in an empathetic manner, and if needed, appropriately refers patient to another staff member to assist, such as a social worker or veterans benefits counselor.

Acts as liaison between patients, the ER clinical staff and Primary Care Team members. Facilitates smooth communication and information flow among them for the purpose of better coordination of patient care and assists patients with questions, complaints, and information relative to administrative procedures. The ER clinical staff will refer administrative problems to the incumbent for timely resolution. Will be the key resource person responsible for orienting and educating a variety of clinical staff in VA Regulations, Policies, and Procedures as they pertain to patient care, and medical administrative matters such as MCCR, Bed Control matters, Income Verification Matching (IVM), etc.

Responsible for interviewing and identifying patients for possible MCCR collections and Data Collection, including determining whether the patient has insurance and entering that information into the DHCP and medical record. Responsible for notifying patients insurance company of any emergent admissions through the ER, acquiring signature for releases as required by law, and updating incomplete data base entries. Will obtain all key information needed for admission, i.e. new 10-10, financial statements, means test, etc., making every effort to accomplish all administrative tasks at one location limiting the number of steps a veteran has to take to receive medical care or administrative assistance.

Will assist veterans and staff on issues of eligibility for beneficiary travel and will set up travel if required. Advise veterans on specific non-medical benefits such as meal tickets, lodging availability, and will refer to Veteran Benefits Counselors for information on any monetary related benefits.

Responsible for accurate and timely capturing of all workload performed in the ER by entering all necessary dispositions, encounter forms, etc. into DHCP daily for ER visits. Monitors patient's enrollment

information in clinics to ensure enrollments are active/accurate, discharges patients from clinics when treatment is completed or otherwise ended. Informs patient of all scheduled appointments to minimize rescheduling and no-shows. Reviews CPT and ICD-9 codes with the clinician for accuracy and appropriateness, and will consult with HMS coders on complex coding questions. Reviews documentation to ensure completion by clinical providers, and refers incomplete documents back to the provider. Works with the Data Validation Unit as needed to ensure proper entry of Ambulatory Care Data.

Develops policies and procedures for standard operations, and compiles data and information regarding ER statistics/trends when necessary to respond to Data Validation Requirements and for management review. Maintains all Log Books in the ER, including, but not limited to ER log, x-ray log, and EKG log's. Responsible for identifying problem prone areas (ER delays, staffing shortages, safety, cleanliness issues) and to submit, in writing, suggestions/resolutions to problems to Supervisor.

Factor 1 - KNOWLEDGE REQUIRED BY POSITION

Extensive specialized expertise and knowledge of VA's, VA patient health information management, application of DHCP programs, eligibility, Privacy Act, and other related laws, VA Medical Center Policies and Procedures as required on a daily basis to coordinate the functions of this position.

Knowledge of admission regulations and procedures, beneficiary travel, Laboratory/Radiology QERR, scheduling of special exams, and appointments to clinical subspecialists and eligibility for non-medical programs such as HISA, Prosthetics, etc. Knowledge of MCCR Program, Income Verification, Copy Regulations, and other aspects of Public Law 101. Knowledge of special instructions regarding specialty clinics in order that clinics will function smoothly and deliver expedient care to patients—not only at this Medical Center, but also at other VA Medical Centers which offer treatment not available here.

Knowledge of procedures for transferring patients in from other facilities, and transferring patients out to other VA and Non-VA facilities. Understanding of the Contract Nursing Home program and it's requirements is necessary.

Understanding of coding principles of ICD-9 coding and CPT-4 methodologies, medical terminology, and related medical usage's covering general medical, general surgical, hospital terms, and medical abbreviations. Ability to receive "stat" work over the telephone and report it to the proper staff.

Ability to plan daily work, set priorities, coordinate administrative responsibilities of ER clinical staff, and support patient continuity of care. Knowledge of workload/data management techniques in order to ensure proper documentation/entry of ER visits.

Skill in oral and written communications, and the ability to deal tactfully and effectively with a variety of people with diverse backgrounds and staff at all levels of the organization.

Knowledge of medical records programs based on M-1, Part 1, Chapter 5, 6, and 9, include filing sequences, content requirements and release of information.

Factor 2 - SUPERVISORY CONTROL

Incumbent is under the general supervision of the Assistant Chief, Ambulatory Care and Processing Section. Works independently with minimal specific instructions, using judgment in resolving issues, and recommends mutually acceptable alternatives for problem resolution. As appropriate, plans and carries out assignments, handles problems and deviations in the work assignment using established

policies and judgment. Meets periodically with supervisor to discuss new directives and policy changes.

Factor 3 - GUIDELINES

Thorough knowledge of VA Regulations, Circulars, Interim Issues, written and oral Directives, Medical Center Policies and Procedures and State Laws as they apply to ER care. These guidelines also pertain to eligibility, travel, scheduling, MCCR, computer input, release of information, admitting regulations, treatment and supplies, and non-medical programs offered by the Medical Center. Sound judgment is required to ensure optimum support to the ER staff, patients, and MAS. The work involves several procedures pertinent to outpatient/ER treatment, i.e. filing, booking emergent appointments, ordering specialized tests, obtaining lab and x-ray results, etc. The guidelines sometimes conflict with patient needs, and may require deviation from existing guidelines/policies.

Factor 4 - COMPLEXITY

Because of the broad range of duties performed, much technical and administrative knowledge is required. Assignments involve direct patient care and concern the operations of ER staff, MAS, and other Services within the Medical Center. There is continuous emphasis on providing timely, compassionate, and competent health care services to our patients. This results in high degree of difficulty in identifying the correct course of action, requiring application of technical knowledge as well as intellect and sometimes originality in reaching a successful resolution.

Factor 5 - SCORE AND EFFECT

Incumbent has the widest possible latitude for use of judgment and discretion in selection of a course of action in the performance of the duties required. The administrative expertise provided by the incumbent affects the day-to-day operations of the professional ER staff, MAS, as well as other Services throughout the Medical Center. Responsible for providing administrative support to professional staff in the ER providing a more personalized and responsive attention to patients who seek emergent care services. Initiates and follows through on all administrative procedures, being alert to emergent or urgent situations, taking quick action, and maintaining a cheerful, cooperative, and professional attitude. Reputation, high standards, cleanliness, appropriateness and image must be maintained at all times.

Factor 6 - PERSONAL CONTACTS

Contact is with veterans, families, and/or representatives, and all levels of administrative/professional staff. In all instances tact, courtesy, compassion, and good judgment must be exercised so as to reflect favorably on this Service, the Medical Center, and the Department of Veterans Affairs.

Factor 7 - PURPOSE OF CONTACTS

Personal and telephonic contacts involve a broad range of issues, such as scheduling, ordering specific tests, the exchange of information, advising the patient, resolving problems, alleviating delays, and providing personalized responsive service to the patient and their families. The unfamiliarity of new staff with the administrative procedures of the VA and the need for constant training in VA methods increases the need for personal contacts for both guidance and orientation.

Factor 8 - PHYSICAL DEMANDS

Physical demands include reaching, pulling, long periods of sitting, standing, and bending, as well as carrying medical records and x-rays. DHCP system involved in 40% of the incumbents daily routine. The work will require covering in all areas of Ambulatory Care and Processing Section.

Factor 9 - WORK ENVIRONMENT

Work is done primarily at the desk within the Emergency Room. Incumbent works in close proximity to patients and therefore may be exposed to communicable diseases. May be subject to hostile, inebriated or mentally distraught patients, possibly resulting in physical harm. Safety precautions are required.

Factor 10 - OTHER

Incumbent has access to printed and electronic files pertaining to veterans and employees. This data must be protected under the provisions of the Privacy Act of 1994, and other applicable Laws, Federal Regulations, VA Statutes, and Policies, etc. Responsible for protecting data from unauthorized release, loss, alteration, or deletion. Applicable regulations must be followed regarding access to computerized files, release of access codes, etc., as set out in the Computer Access Agreement which is signed by the employee.

POSITION DESCRIPTION (Please Read Instructions on the Back)

1. Agency Position No.

02333A

2. Reason for Submission

- Redescription New
 Establishment Other

Explanation (Show any positions replaced)

REDESCRIPTION OF

3. Service

- Hdqtrs Field

4. Employing Office Location

5. Duty Station

523

6. OPM Certification

7. Fair Labor Standards Act

- Exempt Nonexempt

8. Financial Statements Required

- Executive Personnel Employment and Financial

9. Subject to IA Action

- Yes No

10. Position Status

- Competitive
 Excepted (Specify in Remarks)
 SES (Gen.) SES (CR)

11.

- Sup
 MGR
 Neither

12. Sensitivity

- 1-Non-Sensitiv 3-Critical
 2-Noncrit 4-Special

13. Competitive Level Code

X17

14. Agency Use

10-012

PD# 2333A GS-301-9 DATED 9/16/93 A.O.
RECLASSIFICATION

15. Classified/Graded by	Official Title of Position	Pay Plan	Occupational	Gra	Initial	Date
a. U.S. Office of Personnel Management						
b. Department, Agency or Establishment						
c. Second Level Review						
d. First Level Review	MEDICAL ADMINISTRATION SPECIALIST	GS	301	9	59	1/5/10 A.O.
e. Recommended by Supervisor or Initiating Office	Medical Administrative Specialist	GS	301	10		

16. Organization Title of Position (If different from the official title)

17. Name of Employee (If vacant, specify)

18. Department, Agency, or Establishment Department of Veterans Affairs	c. Third Subdivision Patient Services
a. First Subdivision VA Boston Healthcare System	d. Fourth Subdivision
b. Second Subdivision Business Office	e. Fifth Subdivision

19. Employee Review — This is an accurate description of the major duties and responsibilities of my position.

Signature of Employee (optional)

20. Supervisory Certification. I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.

a. Type Name and Title of Immediate Supervisor
 Anne Dow, Assistant Chief
 Signature _____ Date _____

b. Typed Name and Title of Higher-Level Supervisor or Manager (optional)
 Cathleen A. Stephens, Business Office Manager
 Signature *[Signature]* Date *[Date]*

21. Classification/Job Grading Certification. I certify that this position has been classified/graded as required by Title 5, U.S. Code in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.

Typed Name and Title of Official Taking Action
 SCOTT T. JONES
 HR SPECIALIST
 Signature *[Signature]* Date 1/5/10 A.O.

22. Position Classification Standards Used in Classifying/Grading Position
 - USOPM POSITION CLASSIFICATION STANDARDS FOR THE GS-301 MISCELLANEOUS ADMINISTRATION AND PROGRAM SUPPORT DATA 1/79, TS-34
 - USOPM ADMINISTRATIVE ANALYSIS GRADE EVALUATION GUIDE DATED 8/90, TS-98

Information for Employees. The standards, and information on their application, are available in the personnel office. The classification of the position may be and corrected by the agency or the U.S. Office of Personnel Management. Information on classification/job grading appeals, and complaints on exemption from FLSA, is available from the personnel office or the U.S. Office of Personnel Management.

23. Position Review	Initials	Date	Initials	Date	Initials	Date	Initial	Date	Initial	Date
a. Employee (optional)										
b. Supervisor										
c. Classifier										

24. Remarks

25. Description of Major Duties and Responsibilities (See Attached)

Supv. Lvl: *[X]* BUS: 1234 OR 1272
 Risk Lvl: (L) M H

appropriate applicants; counsels non-service connected veterans to determine ability to defray costs of medical care elsewhere. Determines extent of release of medical or social information from patients' records. Safeguards and ensures rights of the patient.

Maintains good public and media relations. Establishes and maintains liaison with the Public Affairs Officer, whenever applicable. Releases appropriate information as directed by the Public Affairs Officer to news media and the public in accordance with VA Regulations, VAMC Policy and Freedom of Information Act requirements.

Coordinates tests and procedures which cannot be done at the Medical Center. Coordinates patient referrals and transfers to and from the Medical Center.

Prepares daily Gains and Losses Sheet and other related statistical reports. Maintains current bed inventory; obtains bed availability for treatment needs. Provides daily report/log of activities occurring during the tour of duty. Briefs on-coming shift of pending events.

Notifies appropriate personnel of veteran's placement on the "Seriously Ill" List, inputs action to VISTA, and ensures appropriate paperwork is completed and filed in the patient's administrative record.

Serves as the key contact for veterans, family members, visitors, VA administrative and medical staff, and other individuals or organizations regarding eligibility and entitlement to VA health care, death benefits, beneficiary travel, and patient funds. Verifies eligibility by means of appropriate documentation or through Master Veterans Records, HINQ, VA Regional Office, or other services. Ensures eligibility information and verification is correctly input into VISTA and in the patient's administrative record. Counsels patients regarding their eligibility for VA benefits. Notifies the Medical Administration office immediately of all ineligible applications or unusual cases. Refers patients who do not reside within the Medical Center's fee service area to the VA Medical Center nearest their home for care.

Interviews next-of-kin of deceased veterans either in person or by recorded telephonic conversation regarding arrangements for release of remains. Explains burial benefits and completes funeral arrangements. Completes death package promptly for appropriate signatures and distribution. Arranges contract burial when unable to identify next-of-kin or designee including body identification and verification of funeral service performed in accordance with VA regulations. Processes release of funds and personal effects.

Determines the appropriateness of notifying the medical examiner on unusual deaths. Investigates unusual incidents occurring during tour involving welfare, injury, abuse of patients, loss of personal property; infractions of VAMC rules; etc. Provides written and oral reporting of incidents involving beneficiaries, employees, as well as safety or other issues.

Ensures VISTA is operational. Coordinates resolution when indicated, of computer related problems with IRM.

Provides orientation for new MOD's, residents, nursing supervisors and other staff regarding legal and quasi-legal matters as defined in VA Directives, and interprets VAMC policies as they relate to patient care and treatment.

Implements search plan for missing patient; informs next-of-kin of search status, as appropriate. Observes for safety, potential problems and takes corrective action. Delegated authority to act on behalf of the Director to initiate actions dealing with disaster situations, in accordance with hospital-wide disaster plan. Responds to emergencies, determines priorities and nature of action to be taken; authorizes services, supplies and personnel; notifies authorities as situation dictates.

Provides guidance and direction to admissions/urgent care procedures, eligibility and entitlement to VA health care, beneficiary travel, patient funds, death benefits, VISTA, Medical Cost Care Recovery (MCCR), MRT, IFCAP, and other computer packages.

Routinely checks the waiting areas on a daily basis to identify patients who may need immediate medical attention or appear confused or disoriented. Notifies the medical staff when potentially serious complaints are identified or observed. Performs necessary administrative processing for emergent cases.

Ability to conduct administrative interview for new applicants for care or when existing information requires updating. Inputs complete and accurate information into VISTA. Obtains patient's signature on all applicable forms. Initiates paperwork required to complete the evaluation/treatment process by imprinting forms with patient identification data. Operates camera and computer program for Veterans Identification Cards (VIC). Creates medical and administrative records for all patients with correctly affixed identification labels, i.e. bar codes, POW, service connected, allergy, MCCR, etc.

Ability to complete the means test when appropriate and counsels veterans regarding entitlement to treatment and billing procedures. Can complete and initiate paperwork for adjudication of the means test or when a hardship waiver is requested. Requests approval from Patient Account Office, Business Team, for continuation of care.

Obtains insurance information and a copy of the insurance card for all veterans and forwards copy to MCCR. Screens encounter forms for completion of billing information such as diagnosis, CPT codes for special procedures, and whether treatment was received for a non-service-connected condition. Enters completed data into VISTA. Returns incomplete encounter forms to the clinic provider for completion when necessary.

Refers third party cases to the MCCR Unit for claims development.

Transfers calls from private physicians, clinics, hospitals, nursing homes, or other VA facilities, and Medical Center staff regarding admission/transfer of patients to the Medical Center to the appropriate physician to determine acceptance of patient. Processes necessary paperwork for accepted patients to admit or schedule an admission.

Performs duties which include entering patient appointments into VISTA. Ordering any necessary laboratory or radiology requests as ordered by clinical staff. Entering information into PCMM and completing the patient checkout process.

Thorough knowledge of contents and arrangement of administrative and medical records, military records, and claim folders in order to search and extract a variety of information relevant to determining eligibility and entitlement, priority of care, and other data necessary for rendering medical care.

Skill in the operation of computer terminal and keyboard to enter and retrieve data, prepare correspondence, memoranda, reports of contact and reports.

Is responsible for protecting printed and electronic files containing sensitive data from unauthorized release, loss, alteration or unauthorized deletion under provisions of Privacy Act of 1974 and other laws, federal regulations and VA policies.

Coordinates recorded telephonic consent between the physician and next-of-kin for emergent procedures. Verifies identity of next-of-kin and monitors recording of conversation with physician. Transcribes the recording and verifies accuracy.

Maintains patient's valuables in the safe. Inventories valuables monthly and sends E-mail report to Staff Assistant, Primary Care. Verifies identity of the patient or next-of-kin prior to release of valuables. Notifies Regional Council of unclaimed valuables for disposition.

Responsible for providing coverage for irregular tours, preparing AOD/evening schedule, assuring full leave coverage with schedule published with changes a minimum of fourteen (14) days in advance. Responsible for calling in all necessary employees on an overtime basis to attend to patient care needs or for emergency repairs, etc., including calling in physicians as requested by the MOD. Secures resources for services needed to manage the Medical Center.

Enforces Medical Center policy that only authorized personnel are permitted into certain areas after normal duty hours. Safeguards and manages valuables. Serves as imprest fund cashier and is accountable for its accuracy.

Provides care and/or services appropriate to the age of the patients being served. Assesses data reflective of the patient's status and interpret the information needed to identify each patient's requirements relative to their age-specific needs and to provide care needed as described in the services' policies and procedures.

In all interactions with both internal and external customers, will reflect an awareness of the medical center's commitment to the mission. To ensure customer satisfaction will support the tenets of good customer service, including reliability, responsiveness, competence, access, credibility, security, communications and understanding the customer. Will make a constant effort to understand the customer's needs and if possible, provide a positive response to those needs.

As a member of an organization which respects the rights and privileges of patients, their families, friends and coworkers, will treat these individuals with courtesy, dignity and respect. Response to difficult or belligerent patients or to members of the general public will be handled with kindness and respect. Interaction with others whether by telephone, in person or in writing will support the mission of the Medical Center.

Supports the goals and objectives of the team and medical center by actively participating as a team member. In this process, will facilitate team efforts by engaging in constructive and supportive communication. Each member of a team will make every effort to accomplish the team goals, as well as their own personal goals. This standard is applied to all types of team efforts.

Contributes to the total organizational effort by submitting thoughts, ideas and suggestions on how to improve the quality, timeliness, efficiency and excellence of the medical center. In this effort, will actively seek ways to improve every aspect of patient services and support functions. Looks for new ways to improve delivery of services, but also ways to improve other functions which impact the delivery of these services.

Ability to process inter- and intra-facility consults and fee base consults.

Screens telephone calls involving patient care and takes appropriate action as necessary.

Reads team E-mail and takes appropriate action as ordered.

Ability to cancel and reschedule clinics as requested. Notifies patients by mail or telephone.

Performs other duties as assigned by the Business Office Manager.

FACTOR I - KNOWLEDGE REQUIRED BY THE POSITION:

In order to function effectively and efficiently as an AOD, Incumbent must possess an infinite variety of information. Must have knowledge of management's objectives, goals, decisions and policies. Knowledge of Medical Center organization, functions, specialties, and programs. Knowledge of medical resources in surrounding community. Knowledge of medical and technical terminology.

Incumbent must be versatile, fully able to cope with any problems as they arise and resolve them quickly and decisively. Comprehensive working knowledge of applicable public laws, VA policy and regulations, station directives, legal decisions, and state laws dealing with care and treatment of veterans and beneficiaries (admissions, discharges, scheduling, inpatient and outpatient policy, fee services, domiciliary care, sharing agreements, legal detention, beneficiary travel, patient funds and valuables, death details procedures and burial benefits, Compensation and Pension activities, medical and dental benefits, eligibility and related matters). Ability to locate and interpret all applicable regulations. Must have a thorough knowledge of all aspects of IM programs and knowledge of how they interrelate to all other Medical Center programs.

Must possess thorough knowledge of commitment laws and proceedings in this state and other neighboring jurisdictions so that all legal aspects of commitments can be effected without violation of patients' rights. Knowledge of public laws governing VA and states served by the Medical Center in matters of judicial hospitalization, issuing warrants, workmen's compensation, reimbursable hospital insurance, liability of third parties, and other medico-legal matters.

Knowledge of medical and administrative records system; of Privacy Act and Freedom of Information Act, as they relate to release of information on patients.

Knowledge of VISTA. Knowledge of the computer functions relating to VISTA, MRT, IFCAP, HINQ, PCMM, PCE, CPRS, VIC and various packages to effectively coordinate activities in the outpatient area. Skill in the operation of computer terminal and keyboard to enter and retrieve data, prepare correspondence, memoranda, reports of contact and reports.

Knowledge of medical terminology used with a variety of diagnostic and treatment procedures in order to give preparatory instructions, to report medical information, and to assign admission authority.

Must possess knowledge of safety and fire prevention rules and regulations, of station and surrounding community disaster plans and procedures, of emergency plans for work areas throughout the Medical Center.

Must be knowledgeable of the rules and regulations, policies and procedures concerning VA burial benefits, autopsies, obtaining consents for special procedures and able to explain them to next-of-kin.

Ability to deal with a variety of individuals with tact and diplomacy. Ability to interpret and explain VA policies to staff, patients, and others. Ability to deal with individuals who are under the influence of alcohol, drugs, or have severe psychiatric problems. Ability to present self in a professional manner and attitude to create a positive impression as the Medical Center's representative.

Ability to identify and analyze complex problems or situations with a range of variables. Ability to complete assigned projects, studies, narrative and statistical reports, reviews in a thorough, accurate, and timely manner. Ability to explain and organize complex issues in writing. Skill in exercising initiative and originality.

Must possess thorough knowledge of operation of a two-way radio for security, various alarms monitored by the switchboard operator, including the Code Blue alarms, Engineering alarms, etc.

Must have knowledge of Department of Veterans Affairs regulations and procedures pertaining to Medical Care Cost Recovery including means test and pharmacy co-pay.

Available to be recalled on an emergency basis in order to maintain administrative support for off-tour patient care. Knowledge of various services offered by the Medical Center, their physical location, and organization.

Knowledge of the Medical Center in order to refer patients or staff to appropriate personnel for questions concerning Fee Services, Health Information Management, Office Operations, etc.

Is responsible for protecting printed and electronic files containing sensitive data from unauthorized release, loss, alteration or unauthorized deletion under provisions of Privacy Act of 1974 and other laws, federal regulations and VA policies.

Knowledge of safety and fire prevention rules and regulations, of facility and community disaster plans and procedures, of emergency plans for work areas throughout the medical center.

Knowledge of VA sponsored community programs such as the Community Support Program, Foster Homes, Community Contract Nursing Homes and Veteran Outreach Centers. Knowledge of social service and medical resources available within the community such as area hospitals, crisis centers, VNA's, shelters, emergency food/fuel assistance programs, and support groups. Must possess crisis intervention skills including the ability to extract critical identification and circumstantial data surrounding a caller in crisis or person presenting with a crisis on the grounds or in the community. Knowledge of federal and state reporting mandates such as those governing Elder, Child or Disabled abuse, notification of medical events to the Department of Public Health, rape protocol, threats made to individuals in the community and animal protection notifications.

Ability to interpret rules, regulations, policies, and procedures to make sound decisions, using good judgment. Ability to adapt to situations quickly, precisely, and accurately. Ability to cope with a wide variety of problems and to resolve them quickly and decisively. Skill in exercising initiative and originality.

Ability to deal with a variety of individuals with tact and diplomacy Ability to interpret and explain VA policies to house staff, patients, employees, and others. Ability to deal with individuals who are under the influence of alcohol, drugs, or have severe psychiatric problems. Ability to present self in a professional attitude and to create positive impression as management's representative. (Position may require the ability to communicate in Spanish, where appropriate.)

Ability to identify and analyze complex problems or situations with a range of variables. Ability to complete assigned projects, studies, narrative and statistical reports, reviews in a thorough, accurate, and timely manner. Ability to explain and organize complex issues in writing.

Available to be recalled on an emergency basis in order to maintain administrative support for off-tour patient care.

Ability to guide and orient the continual turnover of medical and psychiatric interns and residents received by this multi-divisional teaching facility, most of whom are unfamiliar with the Veterans Administration as well as with the surrounding community, and many of whom are from foreign countries unfamiliar with American culture, customs and linguistic nuances (i.e. slang terminology and its accompanying significance).

FACTOR II- SUPERVISORY CONTROLS:

The position reports to the GS-301-13, SUPERVISORY Medical Administration Specialist position. The Patient Services Manager assigns work in terms of issues, functions, and overall objectives and serves as supervisor. The incumbent plans, coordinates, and carries out the assignments independently. The AOD handles problems and resolves most conflicts without reference to the supervisor, in accordance with instructions, applicable precedents, pertinent law, organizational policy, and established practices. Work is assessed through reports of activity in terms of conformance with overall requirements.

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SPECIALIST

FACTOR III - GUIDELINES:

Guidelines for the accomplishment of this work include: Chapter 17 of Title 38 USC, the codified laws governing eligibility for veterans medical services; VHA Directives; Part 17 of Title 38, Code of Federal Regulations; VA Manual M- 1, part 1. The AOD must apply applicable provisions of law, regulations, and VA manuals which pertain to benefits other than medical benefits, i.e., conservatorship, burial benefits, authority to purchase scarce medical services, joint agreements for medical services between VA and DOD. AOD applies appropriate state law for procedures in areas such as patient retention and commitment, consents for autopsy, and advance directives. Guidance is also contained in local Medical Center and Primary Care policies and directives.

Procedures and station policy are established for doing this work. Due to the voluminous guides available, the AOD must use judgment in selecting the appropriate guideline, reference, or procedure

for direct application to the specific situation or in making deviations to accommodate immediate situations.

FACTOR IV - COMPLEXITY:

AOD assignments cover a broad range of Business Office activities, of guidance to other on-duty personnel, and of patient and community relations which require the AOD to utilize a variety of different and unrelated procedures, using a multitude of knowledge and skills. In many instances, there may be alternatives from which to select a course of action or to decide upon an issue. The AOD must analyze the issues involved in the tasks or problems brought forth, must select and apply the appropriate policy and procedure to resolve the issues, and must accept responsibility for their outcome, always considering both the medico-legal aspects of a problem as well as the potential social-political point of view.

In addition, an AOD may be involved in identifying problems in the work accomplished during the tour of duty or in other MAS settings. In these cases, procedures relating to work distribution, workload, and worker skill must be considered in assessing needs and resolving problems.

Factors contributing to the overall complexity of the position are:

- The extensive range of duties, personal contacts, knowledge, and abilities required by the position.
- The nature of a teaching facility with continual physician turnover, hence the need to provide constant orientation.
- The continual change in programs, procedures, policies and resources available in a tertiary Medical Center of this size.

The incumbent serves on a rotation tour schedule encompassing regular and irregular tours, weekends, and holidays.

FACTOR V - SCOPE AND EFFECT:

The work of the AOD involves the treatment of a wide variety of situations, problems, and questions in accordance with department, VHA and Medical Center policies and procedures. The work has a direct impact upon the care of patients during other than regular tours of duty. The incumbent must at all times be prepared in attitude and attire to create a favorable impression as a Medical Center representative.

During irregular tours the purpose of the work is to efficiently and effectively accomplish/coordinate all administrative functions occurring during irregular tours providing administrative continuity and support to the medical program. The effectiveness with which these duties are carried out influence the operations and the public image of the entire Medical Center.

FACTOR VI - PERSONAL CONTACTS:

Within the Medical Center, contacts are with veterans, their families and visitors, clinical staff, administrative and management staff of all Service Teams within the Medical Center, and with top management. Contacts outside the facility include Federal, State and local law enforcement officials,

military personnel, other VA medical Centers and non-VA health facilities, media representatives, staff of Congressional offices, private physicians, attorneys, and the general public.

These contacts occur in a relatively unstructured setting. Many contacts, both within and outside the Medical Center are routine in nature. However, given the diversity of functions and the unforeseen quality of events occurring on other than normal tours of duty, the potential exists for the AOD to encounter a wide variety of individuals from outside the Medical Center. Each contact may have a different purpose and the AOD may be required to assume various roles in the exchange or interaction. The AOD may be exposed to dangerous and hazardous situations when confronted by hostile, aggressive, inebriated or substance-abusing individuals, emotionally disturbed or irritated applicants, grieving families, or threatening patients while handling face-to-face exchanges or while taking threatening telephone calls.

FACTOR VII - PURPOSE OF CONTACTS:

The purpose of contacts will be as diverse as the variety of contacts themselves. They will range from a simple exchange of information to the control of drug-induced violent behavior exhibited by an individual in need of treatment. The need to interrogate, motivate, and/or influence are regular and recurring aspects of the AOD's assignments. They regularly may encounter skeptical veterans, fearful patients, uncooperative individuals and dangerous situations. The AOD must be a skillful communicator, sensitive to nuances of behavior and able to control a variety of potentially difficult interactions. The AOD must remain calm and in control during these situations and be able to react quickly, precisely and accurately.

FACTOR VIII - PHYSICAL DEMANDS:

The work is mostly sedentary with some walking, standing, bending, and carrying items such as patient's medical records, mail, supplies, etc.

There are constant interruptions and, in some instances, resolution of problems can become intense, placing the incumbent in a position of stress on frequent occasions. Incumbent may also be subject to physical danger from an escalating patient.

FACTOR IX - WORK ENVIRONMENT

The work is performed in the reception area in a clinical environment with exposure to communicable disease, physical, and verbal abuse from disturbed patients, distraught family members, and visitors. Safety precautions are necessary.

Visits are necessary to the Emergency Room, wards, and other patient care areas. This may include visits to locked psychiatric units.