DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration
Washington DC 20420

FEB 28 2012

In Reply Refer To:

The Honorable Carolyn Lerner
Special Counsel
U.S. Office of Special Counsel
1730 M Street, NW, Suite 300
Washington, DC 20036-4505

RE: OSC File No. DI-12-0023

Dear Ms. Lerner:

This letter is in response to the Office of Special Counsel's request that the Department of Veterans Affairs (VA) provide additional information, describing actions taken or planned as a result of the investigation regarding procedures for urine sample storage and disposal. As a result of the investigation, the Medical Center has either taken or is in the process of taking the actions listed below.

The following actions have been taken by the Medical Center:

- The Medical Center has created a written procedure for urine specimen storage for the Communication Unit staff, which incorporates policies from Chemistry, Hematology and Microbiology section. With the exception of one staff member who is on extended sick leave until April 2012, training has been provided to all staff, and compliance monitored by direct observation. As of February 13, 2012, there has been 100 percent compliance with this procedure.

- The Medical Center has created a written procedure for handling of urine samples; this procedure is included in the medical technician's competency checklist. The Medical Center has also provided training for this procedure to all but one Communication Unit staff member, who is on extended sick leave until April 2012.

- The Medical Center has provided clear, written guidance specifying which add-on tests can be performed on stored urine samples. Training was provided to all available staff. Compliance is being monitored by review of orders for add-on tests. As of February 16, 2012, compliance with this guideline is 100 percent.

- As of January 25, 2012, the Medical Center is now refrigerating all previously tested urine specimens as soon as they are processed, instead of storing these samples unrefrigerated for 48 hours.

- The Medical Center tracked and trended the use of the stored urine for additional testing within 48 hours of initial testing. As a result of this review, previously tested urine samples are stored for only 24 hours, instead of 48 hours. This change in practice became effective on January 25, 2012.

- In order to ensure laboratory technicians in the Communication Unit are aware of the locations of dedicated hand washing sinks in the Laboratory, the Medical Center has posted signs above or next to these sinks, indicating these sinks are to be used for hand washing only. With the exception of the one staff member on extended leave, all Medical technicians in the Communication Unit have been shown the location of these sinks.

- The Medical Center has developed a written procedure related to disposal of urine; this procedure is included in the medical technician's competency checklist. With the exception of one employee on extended leave, training was provided to all Communication Unit staff, and compliance monitored by direct observation. As of February 13, 2012, compliance with this procedure is 100 percent.

- The Medical Center has developed written criteria for reclassification of urine as medical waste, and subsequent disposal; this criteria includes written descriptions and a urine specimen color chart for visualization. The color chart is posted at the disposal sink. Training was provided to all but the one employee on extended leave, and compliance monitored by direct observation. As of February 15, 2012, compliance was 100 percent.

- With the exception of one employee on extended leave, the Medical Center has provided training to all laboratory and nursing staff involved in collecting, receiving and processing urine samples. The training emphasized the importance of and expectation that all urine samples will include the time of collection of specimen.

The Medical Center is in the process of taking the following actions:

- The Medical Center will provide all of the above-noted training to the employee currently on extended leave, upon this employee's return to duty.

- The Medical Center will continue to monitor compliance with guidelines specifying which add-on tests can be performed on stored urine samples. Compliance will continue to be monitored on a quarterly basis, and non compliance addressed as indicated.

- The Medical Center will monitor compliance with recording collection times for urine samples; non-compliance will be addressed as indicated.

If you have any further questions regarding this matter, please contact Dr. John Pierce, Medical Inspector at (202)461-4094. I appreciate your continuing support of our mission.

Sincerely,

William Schoenhard

William Schoenhard, FACHE