

# US DEPARTMENT OF VETERANS AFFAIRS **OFFICE OF INSPECTOR GENERAL**

Office of Healthcare Inspections

**VETERANS HEALTH ADMINISTRATION** 

# **Comprehensive Healthcare Inspection of the Wilmington VA Medical Center in Delaware**

January 9, 2024



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*Figure 1.* Wilmington VA Medical Center in Delaware. Source: <u>https://www.visn4.va.gov/VISN4/locations/wilmington.asp</u> (accessed August 7, 2023).

### **Abbreviations**

ADPCS	Associate Director of Patient Care Services
CHIP	Comprehensive Healthcare Inspection Program
FY	fiscal year
LIP	licensed independent practitioner
OIG	Office of Inspector General
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network



# **Report Overview**

This Office of Inspector General (OIG) Comprehensive Healthcare Inspection Program (CHIP) report provides a focused evaluation of the quality of care delivered in the inpatient and outpatient settings of the Wilmington VA Medical Center and multiple outpatient clinics in Delaware and New Jersey. The inspection covers key clinical and administrative processes that are associated with promoting quality care.

Comprehensive healthcare inspections are one element of the OIG's overall efforts to ensure the nation's veterans receive high-quality and timely VA healthcare services. The OIG inspects each facility approximately every three years and selects and evaluates specific areas of focus each year. At the time of this inspection, the OIG focused on core processes in the following five areas of clinical and administrative operations:

- 1. Leadership and organizational risks
- 2. Quality, safety, and value
- 3. Medical staff privileging
- 4. Environment of care
- 5. Mental health (focusing on suicide prevention initiatives)

The OIG initiated an unannounced inspection of the Wilmington VA Medical Center during the week of February 27, 2023. The OIG held interviews and reviewed clinical and administrative processes related to specific areas of focus that affect patient outcomes. Although the OIG reviewed a broad spectrum of processes, the sheer complexity of VA medical facilities limits inspectors' ability to assess all areas of clinical risk. The findings presented in this report are a snapshot of the medical center's performance within the identified focus areas at the time of the OIG inspection and may help leaders identify vulnerable areas or conditions that, if properly addressed, could improve patient safety and healthcare quality.

#### **Results Summary**

The OIG noted opportunities for improvement and issued two recommendations to the Director in the Environment of Care area of review. The number of recommendations should not be used as a gauge for the overall quality of care provided at this medical center. The intent is for leaders to use recommendations as a road map to help improve operations and clinical care moving forward. Recommendations are based on retrospective findings of deficiencies in adherence to Veterans Health Administration national policy and require action plans that can effectively address systems issues that may have contributed to the deficiencies or interfered with the delivery of quality health care. The results are detailed in the report section, and the recommendations are summarized in appendix A on page 17.

#### **VA Comments**

The Veterans Integrated Service Network Director and Medical Center Director agreed with the comprehensive healthcare inspection findings and recommendations and provided acceptable improvement plans (see appendixes C and D, pages 19–20, and the responses within the body of the report for the full text of the directors' comments). The OIG will follow up on the planned actions for the open recommendations until they are completed.

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### **Purpose and Scope**

The purpose of the Office of Inspector General (OIG) Comprehensive Healthcare Inspection Program (CHIP) is to conduct routine oversight of VA medical facilities that provide healthcare services to veterans. This report's evaluation of the quality of care delivered in the inpatient and outpatient settings of the Wilmington VA Medical Center examines a broad range of key clinical and administrative processes associated with positive patient outcomes. The OIG reports its findings to Veterans Integrated Service Network (VISN) and medical center leaders so they can make informed decisions to improve care.<sup>1</sup>

Effective leaders manage organizational risks by establishing goals, strategies, and priorities to improve care; setting expectations for quality care delivery; and promoting a culture to sustain positive change.<sup>2</sup> Effective leadership has been cited as "among the most critical components that lead an organization to effective and successful outcomes."<sup>3</sup>

To examine risks to patients and the organization, the OIG focused on core processes in the following five areas of clinical and administrative operations:<sup>4</sup>

- 1. Leadership and organizational risks
- 2. Quality, safety, and value
- 3. Medical staff privileging
- 4. Environment of care
- 5. Mental health (focusing on suicide prevention initiatives)

<sup>&</sup>lt;sup>1</sup> VA administers healthcare services through a nationwide network of 18 regional systems referred to as Veterans Integrated Service Networks.

<sup>&</sup>lt;sup>2</sup> Anam Parand et al., "The Role of Hospital Managers in Quality and Patient Safety: A Systematic Review," *British Medical Journal* 4, no. 9 (September 5, 2014): 13, <u>https://doi.org/10.1136/bmjopen-2014-005055</u>.

<sup>&</sup>lt;sup>3</sup> Danae F. Sfantou et al., "Importance of Leadership Style towards Quality of Care Measures in Healthcare Settings: A Systematic Review," *Healthcare (Basel)* 5, no. 4 (October 14, 2017): 73, https://doi.org/10.3390/healthcare5040073.

<sup>&</sup>lt;sup>4</sup> CHIP site visits addressed these processes during fiscal year (FY) 2023 (October 1, 2022, through September 30, 2023); they may differ from prior years' focus areas.

# Methodology

The Wilmington VA Medical Center includes multiple outpatient clinics in Delaware and New Jersey. General information about the medical center can be found in appendix B.

The inspection team conducted an on-site review during the week of February 27, 2023.<sup>5</sup> During the site visit, the OIG did not receive any complaints beyond the scope of this inspection that required referral to the OIG hotline.

Oversight authority to review the programs and operations of VA medical facilities is authorized by the Inspector General Act of 1978.<sup>6</sup> The OIG reviews available evidence within a specified scope and methodology and makes recommendations to VA leaders, if warranted. Findings and recommendations do not define a standard of care or establish legal liability.

This report's recommendations for improvement address problems that can influence the quality of patient care significantly enough to warrant OIG follow-up until medical center leaders complete corrective actions. The Director's responses to the report recommendations appear within the associated topic area. The OIG accepted the action plans that leaders developed based on the reasons for noncompliance.

The OIG conducted the inspection in accordance with OIG procedures and *Quality Standards for Inspection and Evaluation* published by the Council of the Inspectors General on Integrity and Efficiency.

<sup>&</sup>lt;sup>5</sup> The OIG's last Clinical Assessment Program review of the Wilmington VA Medical Center occurred in January 2017. The Joint Commission performed hospital, behavioral health care and human services, and home care accreditation reviews in May 2021.

<sup>&</sup>lt;sup>6</sup> Inspector General (IG) Act of 1978, as amended, 5 U.S.C. §§ 401–424.

# **Results and Recommendations**

#### Leadership and Organizational Risks

Healthcare leaders must focus their efforts to achieve results for the populations they serve.<sup>7</sup> High-impact leaders should be person-centered and transparent, engage front-line staff members, have a "relentless focus" on their organization's vision and strategy, and "practice systems thinking and collaboration across boundaries."<sup>8</sup> When leaders fully engage and inspire employees, create psychological safety, develop trust, and apply organizational values to all decisions, they lay the foundation for a culture and system focused on clinical and patient safety.<sup>9</sup>

To assess this medical center's leadership and risks, the OIG considered the following indicators:

- 1. Executive leadership position stability and engagement
- 2. Budget and operations
- 3. Employee satisfaction
- 4. Patient experience
- 5. Identified factors related to possible lapses in care and medical center leaders' responses

#### **Executive Leadership Position Stability and Engagement**

Each VA facility organizes its leadership structure to address the needs and expectations of the local veteran population it serves. The medical center had a leadership team consisting of the Director, Chief of Staff, Associate Director of Patient Care Services (ADPCS), and Associate Director of Operations. The Chief of Staff and ADPCS oversaw patient care, which included managing service directors and program chiefs.

At the time of the OIG inspection, the Director was serving in an interim capacity and the leaders had worked together for approximately one month. To help assess executive leaders' engagement, the OIG interviewed the Interim Director, Chief of Staff, ADPCS, and Associate Director of Operations regarding their knowledge, involvement, and support of actions to improve or sustain performance.

<sup>&</sup>lt;sup>7</sup> Stephen Swensen et al., *High-Impact Leadership: Improve Care, Improve the Health of Populations, and Reduce Costs*, Institute for Healthcare Improvement White Paper, 2013.

<sup>&</sup>lt;sup>8</sup> Swensen et al., *High-Impact Leadership: Improve Care, Improve the Health of Populations, and Reduce Costs.* 

<sup>&</sup>lt;sup>9</sup> Allan Frankel et al., *A Framework for Safe, Reliable, and Effective Care,* Institute for Healthcare Improvement White Paper, 2017.

#### **Budget and Operations**

The OIG noted the medical center's fiscal year (FY) 2022 annual medical care budget of \$386,348,743 had increased by over 16 percent compared to the previous year's budget of \$332,883,417.<sup>10</sup> The executive leaders reported the budget was adequate to meet the medical center's needs. The Interim Director reported the medical center was growing rapidly, which accounted for the increase in staff and the budget. The ADPCS added the additional funds allowed leaders to increase salaries to compete with local hospitals.

#### **Employee Satisfaction**

The All Employee Survey is an "annual, voluntary, census survey of VA workforce experiences. The data are anonymous and confidential."<sup>11</sup> Although the OIG recognizes that employee satisfaction survey data are subjective, they can be a starting point for discussions, indicate areas for further inquiry, and be considered along with other information on medical facility leaders.

To assess employee viewpoints, the OIG reviewed results from VA's All Employee Survey from FYs 2020 through 2022 regarding their perceived ability to disclose a suspected violation without fear of reprisal.<sup>12</sup> Table 1 provides relevant survey results for Veterans Health Administration (VHA) and the medical center over time.

The All Employee Survey score for employees' perceived ability to disclose a suspected violation without fear of reprisal had remained stable but slightly below the VHA average over all three years. The Interim Director and Associate Director described holding employee town hall discussions, staff meetings, and patient safety events to reinforce safe workplace culture.

#### Table 1. All Employee Survey Question: Ability to Disclose a Suspected Violation (FYs 2020 through 2022)

All Employee Survey Group	FY 2020	FY 2021	FY 2022	
VHA	3.8	3.9	3.9	
Wilmington VA Medical Center	3.6	3.7	3.7	

Source: VA All Employee Survey (accessed October 24, 2022).

Note: Respondents scored this survey item from 1 (Strongly disagree) through 6 (Do not know).

<sup>&</sup>lt;sup>10</sup> Veterans Health Administration (VHA) Support Service Center.

<sup>&</sup>lt;sup>11</sup> "AES Survey History, Understanding Workplace Experiences in VA," VHA Support Service Center.

<sup>&</sup>lt;sup>12</sup> The OIG makes no comment on the adequacy of the VHA average. The VHA average is used for comparison purposes only.

#### **Patient Experience**

VHA uses surveys from the Consumer Assessment of Healthcare Providers and Systems program to assess patients' healthcare experiences and compare them to the private sector.<sup>13</sup> VHA also collects Survey of Healthcare Experiences of Patients data from Inpatient, Patient-Centered Medical Home (primary care), and Specialty Care surveys.<sup>14</sup> The OIG reviewed responses to three relevant survey questions that reflect patient experiences with the medical center from FYs 2020 through 2022. Table 2 provides survey results for VHA and the medical center over time.

Patient satisfaction scores indicated patients were generally more satisfied with their inpatient and specialty care than VHA patients nationally but less satisfied with their primary care. The Interim Director reported actively recruiting more primary care providers, particularly for community-based outpatient clinics, to ensure prompt patient access to services. The ADPCS shared that during the COVID–19 pandemic, face-to-face visits decreased or ceased entirely, which caused mixed responses from patients. The Chief of Staff added that leaders established a pay differential for providers completing in-person appointments for patients who preferred faceto-face visits.

	FY 2020		FY 2021		FY 2022	
Questions	VHA	Medical Center	VHA	Medical Center	VHA	Medical Center
Inpatient: Would you recommend this hospital to your friends and family?*	69.5	71.7	69.7	64.8	68.9	69.7
Patient-Centered Medical Home: Overall, how satisfied are you with the health care you have received at your VA facility during the last 6 months? <sup>†</sup>	82.5	83.6	81.9	80.0	81.7	78.7
Specialty Care: Overall, how satisfied are you with the health care you have received at your VA facility during the last 6 months?†	84.8	87.7	83.3	84.2	83.1	88.5

# Table 2. Survey of Healthcare Experiences of Patients (FYs 2020 through 2022)

Source: VHA Office of Quality and Patient Safety, Analytics and Performance Integration, Performance Measurement (accessed December 8 and 14, 2022).

\*The response average is the percent of "Definitely yes" responses.

*†The response average is the percent of "Very satisfied" and "Satisfied" responses.* 

<sup>13</sup> "Patient Experiences Survey Results," VHA Support Service Center.

<sup>14</sup> "Patient Experiences Survey Results," VHA Support Service Center.

#### Identified Factors Related to Possible Lapses in Care and Medical Center Leaders' Responses

Leaders must ensure patients receive high-quality health care that is safe, effective, timely, and patient-centered because any preventable harm episode is one too many.<sup>15</sup> According to The Joint Commission's standards for leadership, a culture of safety and continual process improvements lead to safe, quality care for patients.<sup>16</sup> A VA medical facility's culture of safety and learning enables leaders to identify and correct systems issues. If leaders do not respond when adverse events occur, they may miss opportunities to learn and improve from those events and risk losing trust from patients and staff.<sup>17</sup>

"A sentinel event is a patient safety event (not primarily related to the natural course of a patient's illness or underlying condition) that reaches a patient and results in death, severe harm (regardless of duration of harm), or permanent harm (regardless of severity of harm)."<sup>18</sup> Additionally, an institutional disclosure is "a formal process by which VA medical facility leader(s), together with clinicians and others as appropriate, inform the patient or the patient's personal representative that an adverse event has occurred during the patient's care that resulted in, or is reasonably expected to result in, death or serious injury, and provide specific information about the patient's rights and recourse."<sup>19</sup> Lastly, a large-scale disclosure is "a formal process by which VHA officials assist with coordinating the notification to multiple patients, or their personal representatives, that they may have been affected by an adverse event resulting from a systems issue."<sup>20</sup> To this end, VHA implemented standardized processes to guide leaders in measuring, assessing, and reacting to possible lapses in care to improve patient safety.<sup>21</sup>

<sup>&</sup>lt;sup>15</sup> Frankel et al., *A Framework for Safe, Reliable, and Effective Care*; "Quality and Patient Safety (QPS)," Department of Veterans Affairs, accessed October 13, 2021, https://www.va.gov/QUALITYANDPATIENTSAFETY/.

<sup>&</sup>lt;sup>16</sup> The Joint Commission, *Standards Manual*, E-dition, February 19, 2023. A culture of safety is "the product of individual and group values, attitudes, perceptions, competencies, and patterns of behavior that determine the commitment to, and the style and proficiency of, an organizations health and safety management." "Hospital Survey on Patient Safety Culture: User's Guide," Agency for Healthcare Research and Quality, July 2018, accessed March 20, 2023, <u>https://www.ahrq.gov/sites/default/files/wysiwyg/professionals/quality-patient-safety/patientsafetyculture/hospital/userguide/hospcult.pdf</u>.

<sup>&</sup>lt;sup>17</sup> Jim Conway et al., *Respectful Management of Serious Clinical Adverse Events (2nd ed.)*, Institute for Healthcare Improvement White Paper, 2011.

<sup>&</sup>lt;sup>18</sup> The Joint Commission, *Comprehensive Accreditation Manual for Hospitals*, Sentinel Event Policy (SE), July 2023. VHA incorporates The Joint Commission's definition of a sentinel event in VHA Directive 1190, *Peer Review for Quality Management*, November 21, 2018.

<sup>&</sup>lt;sup>19</sup> VHA Directive 1004.08, *Disclosure of Adverse Events to Patients*, October 31, 2018.

<sup>&</sup>lt;sup>20</sup> VHA Directive 1004.08.

<sup>&</sup>lt;sup>21</sup> VHA Handbook 1050.01, *VHA National Patient Safety Improvement Handbook*, March 4, 2011. (VHA rescinded and replaced this handbook with VHA Directive 1050.01, *VHA Quality and Patient Safety Programs*, March 24, 2023. The new directive contains similar language regarding patient safety as the rescinded handbook.)

The OIG requested a list of sentinel events and institutional and large-scale disclosures that occurred during FY 2022 and reviewed the information staff provided. The Chief of Staff stated that leaders encourage employees to routinely enter patient safety events into the reporting system. The Patient Safety Manager stated quality management staff review events, assess them for the level of harm, and report the incidents to leaders daily. The ADPCS reported reviewing all adverse events to determine proper follow-up and collaborating with patient safety staff to determine recommended actions. The ADPCS stated patient safety staff review sentinel event criteria and recommend actions based on VHA directives. The Chief of Staff added that staff occasionally consult with VISN subject matter experts to determine proper follow-up for adverse events.

# Leadership and Organizational Risks Findings and Recommendations

The OIG made no recommendations.

#### Quality, Safety, and Value

VHA is committed to providing exceptional health care to veterans.<sup>22</sup> To achieve this goal, VHA requires that its medical facility leaders implement programs to monitor the quality of patient care and performance improvement activities and maintain Joint Commission accreditation.<sup>23</sup> Many quality-related activities are informed and required by VHA directives and nationally recognized accreditation standards.<sup>24</sup>

VHA implemented the National Center for Patient Safety program to develop a range of patient safety methodologies and practices. VHA's Patient Safety program includes staff assessing system vulnerabilities that may result in patient harm, reporting adverse patient safety events, and focusing on prevention.<sup>25</sup> According to The Joint Commission's standards for performance improvement, staff must analyze data to monitor performance and identify trends and improvement opportunities, then implement actions to enhance patient safety.<sup>26</sup>

The OIG assessed the medical center's processes for conducting peer reviews of clinical care.<sup>27</sup> Peer reviews, "when conducted systematically and credibly," reveal areas for improvement (involving one or more providers' practices) and can result in both immediate and "long-term improvements in patient care."<sup>28</sup> Peer reviews are "intended to promote confidential and non-punitive assessments of care" that consistently contribute to quality management efforts at the individual provider level.<sup>29</sup>

The OIG team interviewed key managers and staff and evaluated peer reviews and patient safety reports. The OIG also reviewed three deaths that occurred within 24 hours of inpatient admission during FY 2022.

#### Quality, Safety, and Value Findings and Recommendations

The OIG made no recommendations.

<sup>&</sup>lt;sup>22</sup> Department of Veterans Affairs, Veterans Health Administration Blueprint for Excellence, September 21, 2014.

<sup>&</sup>lt;sup>23</sup> VHA Directive 1100.16, *Health Care Accreditation of VHA Facilities and Programs*, July 19, 2022. (VHA rescinded and replaced this directive with VHA Directive 1100.16, *Health Care Accreditation of VHA Facilities and Programs*, July 19, 2022. Both directives have same or similar language regarding accreditation requirements for The Joint Commission.)

<sup>&</sup>lt;sup>24</sup> VHA Directive 1100.16.

<sup>&</sup>lt;sup>25</sup> VHA Handbook 1050.01; VHA Directive 1050.01.

<sup>&</sup>lt;sup>26</sup> The Joint Commission, *Standards Manual*, E-dition, PI.03.01.01, PI.04.01.01, January 1, 2022.

<sup>&</sup>lt;sup>27</sup> A peer review is a "critical review of care performed by a peer," to evaluate care provided by a clinician for a specific episode of care, identify learning opportunities for improvement, provide confidential communication of the results back to the clinician, and identify potential system or process improvements. VHA Directive 1190.

<sup>&</sup>lt;sup>28</sup> VHA Directive 1190.

<sup>&</sup>lt;sup>29</sup> VHA Directive 1190.

#### **Medical Staff Privileging**

VHA has defined procedures for the clinical privileging of "all health care professionals who are permitted by law and the facility to practice independently."<sup>30</sup> These healthcare professionals are known as licensed independent practitioners (LIPs) and provide care "without supervision or direction, within the scope of the individual's license, and in accordance with individually-granted clinical privileges."<sup>31</sup>

Privileges need to be specific and based on the individual practitioner's clinical competence. Privileges are requested by the LIP and reviewed by the responsible service chief, who then makes a recommendation to approve, deny, or amend the request. An executive committee of the medical staff evaluates the LIP's credentials and service chief's recommendation to determine whether "clinical competence is adequately demonstrated to support the granting of the requested privileges," and submits the final recommendation to the facility director.<sup>32</sup> LIPs are granted clinical privileges for a limited time and must be reprivileged prior to their expiration.<sup>33</sup>

VHA states the Focused Professional Practice Evaluation is a defined period during which service chiefs assess LIPs' professional performance. The Focused Professional Practice Evaluation process occurs when a practitioner is hired at the facility and granted initial or additional privileges. Facility leaders must also monitor the LIP's performance by regularly conducting an Ongoing Professional Practice Evaluation to ensure the continuous delivery of quality care.<sup>34</sup>

VHA's credentialing process involves the assessment and verification of healthcare practitioners' qualifications to provide care and is the first step in ensuring patient safety.<sup>35</sup> Historically, many VHA facilities had portions of their credentialing processes aligned under different leaders, which led to inconsistent program oversight, position descriptions, and reporting structures. VHA implemented credentialing and privileging modernization efforts to increase standardization and now requires all credentialing and privileging functions to be merged into one office under the chief of staff. VHA also requires facilities to have credentialing and

<sup>&</sup>lt;sup>30</sup> VHA Handbook 1100.19, *Credentialing and Privileging*, October 15, 2012. (VHA rescinded and replaced this handbook with VHA Directive 1100.21(1), *Privileging*, March 2, 2023, amended April 26, 2023. VHA previously replaced the credentialing portion of this handbook with VHA Directive 1100.20, *Credentialing of Health Care Providers*, September 15, 2021.)

<sup>&</sup>lt;sup>31</sup> VHA Handbook 1100.19.

<sup>&</sup>lt;sup>32</sup> VHA Handbook 1100.19.

<sup>&</sup>lt;sup>33</sup> VHA Handbook 1100.19.

<sup>&</sup>lt;sup>34</sup> VHA Handbook 1100.19.

<sup>&</sup>lt;sup>35</sup> VHA Directive 1100.20.

privileging managers and specialists with job duties that align under standard position descriptions.<sup>36</sup>

The OIG interviewed key managers and selected and reviewed the privileging folders of 29 medical staff members who underwent initial privileging or reprivileging during FY 2022.

#### **Medical Staff Privileging Findings and Recommendations**

The OIG made no recommendations.

<sup>&</sup>lt;sup>36</sup> Assistant Under Secretary for Health for Operations/Chief Human Capital Management memo, "Credentialing and Privileging Staffing Modernization Efforts—Required Modernization Actions and Implementation of Approved Positions Fiscal Year 2020," December 16, 2020.

#### **Environment of Care**

Any facility, regardless of its size or location, faces vulnerabilities in the healthcare environment. VHA requires staff to conduct environment of care inspections and track issues until they are resolved. The goal of VHA's environment of care program is to ensure "a safe, clean health care environment that provides the highest standards in the health care setting."<sup>37</sup> The environment of care program includes elements such as infection control, patient and employee safety, privacy, and supply chain management.<sup>38</sup>

The purpose of this inspection was to determine whether staff at VA medical facilities maintained a clean and safe healthcare environment in accordance with applicable standards. The OIG inspected selected areas that are often associated with higher risks of harm to patients. These areas may include inpatient mental health units, where patients with active suicidal ideations or attempts are treated, and community living centers, where vulnerable populations reside in a home-like environment and receive assistance in achieving their highest level of function and well-being.<sup>39</sup>

During the OIG's review of the environment of care, the inspection team examined relevant documents, interviewed managers and staff, and inspected five patient care areas:

- Community living center (East Courage Boulevard)
- Emergency Department
- Intensive care unit
- Medical/surgical inpatient unit (4 East)
- Primary care clinic

#### **Environment of Care Findings and Recommendations**

VHA requires staff to track deficiencies identified during comprehensive environment of care inspections until they are resolved.<sup>40</sup> The OIG did not find evidence staff tracked 11 deficiencies to resolution; after further investigation, the OIG determined that staff had resolved 4 of these

<sup>&</sup>lt;sup>37</sup> VHA Directive 1608, *Comprehensive Environment of Care Program*, June 21, 2021. (This directive was in effect at the time of the inspection. VHA amended it September 7, 2023.)

<sup>&</sup>lt;sup>38</sup> VHA Directive 1608. The supply chain management system must meet the needs of its customers, which involves ensuring availability of the right product in the right place and at the right time. VHA Directive 1761, *Supply Chain Management Operations*, December 30, 2020.

<sup>&</sup>lt;sup>39</sup> VHA Handbook 1160.06, *Inpatient Mental Health Services*, September 16, 2013. (VHA rescinded and replaced this handbook with VHA Directive 1160.06, *Inpatient Mental Health Services*, September 27, 2023.) VHA Handbook 1142.01, *Criteria and Standards for VA Community Living Centers (CLC)*, August 13, 2008. (VHA rescinded and replaced this handbook with VHA Directive 1142, *Standards for Community Living Centers*, October 5, 2023.) During the review period, the medical center did not have an inpatient mental health unit. <sup>40</sup> VHA Directive 1608.

deficiencies but did not record their closure in the tracking software.<sup>41</sup> When staff do not track deficiencies to completion, they may be unable to ensure potential patient safety risks are resolved. The Safety and Occupational Health Manager reported a lack of communication among staff as the reason for noncompliance.

Failure to track deficiencies identified during comprehensive environment of care inspections until resolution is a repeat finding from the OIG's Clinical Assessment Program report published in 2017.<sup>42</sup>

#### **Recommendation 1**

1. The Director ensures staff track deficiencies identified during comprehensive environment of care inspections through resolution.

Medical center concurred.

Target date for completion: February 29, 2024

Medical center response: The Executive Director evaluated and did not determine any additional reasons for noncompliance. The facility will monitor the Environment of Care [EOC] Rounds to ensure compliance with the VHA VISN 4 Requirement that Deficiencies Identified during EOC Rounds are closed within 14-business days or have a documented Plan for Action in [the] Performance Logic Inspection Tool to ensure findings are resolved.

Tracking will include the following identifiers for each month tracked: EOC Meeting Month, EOC Meeting Date, Month of Compliance, Compliance Percentage Achieved, [and] Confirmation that the data captured was reviewed at the monthly EOC Meeting and documented in the minutes for that month.

Currently

September = 100%October = 100%November = 100%December = 96%

Compliance will be reported monthly to the Environment of Care and Safety Council and Administrative Leadership Board until 90% or better compliance is sustained for six consecutive months.

<sup>&</sup>lt;sup>41</sup> The 11 deficiencies were on 2nd Floor West, the East Courage Boulevard dining room, the Ground Floor Clinical Addition, Ground Floor East, Ground Floor West, and the Montchanin Complex. The 4 resolved deficiencies were on Ground Floor East, Ground Floor West, and the Montchanin Complex.

<sup>&</sup>lt;sup>42</sup> VA OIG, <u>*Clinical Assessment Program Review of the Wilmington VA Medical Center, Wilmington, Delaware,*</u> Report No. 16-00548-361, September 20, 2017.

VHA requires medical center staff to provide a "safe, clean and high quality environment of care for Veterans, their families, visitors and employees."<sup>43</sup> The OIG observed dirty ice machines in all inspected units, which presents a risk of infection to patients, staff, and visitors. The Chief, Hospital Housekeeping Officer reported that although staff cleaned the ice machines every day, they did not use the proper cleaner.

#### **Recommendation 2**

2. The Director ensures staff maintain a safe and clean environment.

Medical center concurred.

Target date for completion: July 1, 2024

Medical center response: The Executive Director evaluated and did not determine any additional reasons for noncompliance. The Wilmington VA Medical Center was following manufacturer recommendations of cleaning ice machine to include water tubes at the dispensing end annually. To ensure a clean and safe environment, the cleaning of ice machines to include water tubes was changed to monthly.

N [numerator]=Number of ice machines cleaned

D [denominator]=Number of ice machines in the VA Medical Center

Compliance will be reported to the Administrative Leadership Board monthly until 90% or better compliance is sustained for six consecutive months.

<sup>&</sup>lt;sup>43</sup> VHA Directive 1608.

#### Mental Health: Suicide Prevention Initiatives

Suicide prevention is the top clinical priority for VA.<sup>44</sup> Suicide is a significant health problem in the United States, with over 45,000 lives lost in 2020.<sup>45</sup> The suicide rate for veterans was higher than for nonveteran adults during 2020.<sup>46</sup> "Congress, VA, and stakeholders continue to express concern over seemingly limited progress made…to reduce veteran suicide."<sup>47</sup>

Due to the prevalence of suicide among at-risk veterans, VHA implemented a two-phase process to screen and assess for suicide risk in clinical settings. The phases include the Columbia-Suicide Severity Rating Scale Screener and subsequent completion of the Comprehensive Suicide Risk Evaluation when the screen is positive.<sup>48</sup> VHA states that providers should complete the Comprehensive Suicide Risk Evaluation on the same calendar day as the positive screen and notify the suicide prevention team if a patient reports suicidal behaviors during the evaluation.<sup>49</sup>

VHA requires each medical center and very large community-based outpatient clinic to have a full-time suicide prevention coordinator to track and follow-up with high-risk veterans, conduct community outreach activities, and inform leaders of suicide-related events.<sup>50</sup>

To determine whether staff complied with selected suicide prevention requirements, the OIG interviewed key employees and reviewed relevant documents and the electronic health records of 49 randomly selected patients who had a positive suicide screen in FY 2022 and received primary care services.

<sup>&</sup>lt;sup>44</sup> VA Secretary memo, "Agency-Wide Required Suicide Prevention Training," October 15, 2020.

<sup>&</sup>lt;sup>45</sup> "Suicide Prevention: Facts about Suicide," Centers for Disease Control and Prevention, accessed January 20, 2023.

<sup>&</sup>lt;sup>46</sup> VA Office of Mental Health and Suicide Prevention, *2022 National Veteran Suicide Prevention Annual Report*, September 2022.

<sup>&</sup>lt;sup>47</sup> Congressional Research Service, "Veteran Suicide Prevention," IF11886 version 2, July 29, 2021.

<sup>&</sup>lt;sup>48</sup> Assistant Under Secretary for Health for Clinical Services/Chief Medical Officer memo, "Eliminating Veteran Suicide: Suicide Risk Screening and Evaluation Requirements and Implementation (Risk ID Strategy)," November 13, 2020. (This memo was superseded by the Assistant Under Secretary for Health for Clinical Services/Chief Medical Officer memo, "Eliminating Veteran Suicide: Suicide Risk Screening and Evaluation Requirements and Implementation (Risk ID Strategy)," Requirements and Implementation Update (Risk ID Strategy)," November 23, 2022.)

<sup>&</sup>lt;sup>49</sup> Assistant Under Secretary for Health for Clinical Services/Chief Medical Officer memo, "Eliminating Veteran Suicide: Suicide Risk Screening and Evaluation Requirements and Implementation Update (Risk ID Strategy);" Assistant Under Secretary for Health for Clinical Services/Chief Medical Officer memo, "Suicide Behavior and Overdose Reporting," July 20, 2021. (This memo was superseded by the Assistant Under Secretary for Health for Clinical Services/Chief Medical Officer memo, "Update to Suicide Behavior and Overdose Reporting," May 9, 2023.)

<sup>&</sup>lt;sup>50</sup> VHA Directive 1160.07, *Suicide Prevention Program*, May 24, 2021. "Very large CBOCs [community-based outpatient clinic] are those that serve more than 10,000 unique veterans each year." VHA Handbook 1160.01, *Uniform Mental Health Services in VA Medical Centers and Clinics*, September 11, 2008, amended November 16, 2015. (VHA rescinded and replaced this handbook with VHA Directive 1160.01, *Uniform Mental Health Services in VHA Medical Points of Service*, April 27, 2023.)

#### **Mental Health Findings and Recommendations**

The OIG made no recommendations.

#### **Report Conclusion**

To assist leaders in evaluating the quality of care at their medical center, the OIG conducted a detailed inspection of five clinical and administrative areas and provided two recommendations on systemic issues that may adversely affect patient care. The total number of recommendations does not necessarily reflect the overall quality of all services delivered within this medical center. However, the OIG's findings highlight areas of concern, and the recommendations are intended to help guide improvement efforts. The OIG appreciates the participation and cooperation of VHA staff during this inspection process. A summary of the recommendations is presented in appendix A.

# Appendix A: Comprehensive Healthcare Inspection Program Recommendations

The table below outlines two OIG recommendations aimed at reducing vulnerabilities that may lead to adverse patient safety events. The recommendations are attributable to the Director. The intent is for leaders to use recommendations as a road map to help improve operations and clinical care.

Review Areas	Recommendations for Improvement
Leadership and Organizational Risks	• None
Quality, Safety, and Value	• None
Medical Staff Privileging	• None
Environment of Care	<ul> <li>Staff track deficiencies identified during comprehensive environment of care inspections through resolution.</li> <li>Staff maintain a safe and clean environment.</li> </ul>
Mental Health: Suicide Prevention Initiatives	• None

#### Table A.1. Summary Table of Recommendations

# **Appendix B: Medical Center Profile**

The table below provides general background information for this medium complexity (2) affiliated medical center reporting to VISN 4.<sup>1</sup>

Profile Element	Medical Center Data FY 2020*	Medical Center Data FY 2021 <sup>†</sup>	Medical Center Data FY 2022 <sup>‡</sup>	
Total medical care budget	\$322,469,744	\$332,883,417	\$386,348,743	
Number of:				
Unique patients	32,613	39,287	41,169	
Outpatient visits	347,414	398,070	375,126	
Unique employees <sup>§</sup>	962	1,002	1,015	
Type and number of operating beds:				
Community living center	60	60	60	
• Medicine <sup>1</sup>	47	47	47	
• Surgery <sup>i</sup>	13	13	13	
Average daily census:				
Community living center	34	32	39	
• Medicine <sup>l</sup>	11	13	15	
• Surgery <sup>l</sup>	0	-	-	
Intermediate	2	4	5	

#### Table B.1. Profile for Wilmington VA Medical Center (460) (October 1, 2019, through September 30, 2022)

Source: VHA Support Service Center and VA Corporate Data Warehouse.

Note: The OIG did not assess VA's data for accuracy or completeness.

\*October 1, 2019, through September 30, 2020.

†October 1, 2020, through September 30, 2021.

<sup>‡</sup>October 1, 2021, through September 30, 2022.

<sup>§</sup>Unique employees involved in direct medical care (cost center 8200).

<sup>1</sup>According to the Associate Director of Operations, the medical center had a combined acute medical and surgical unit at the time of the inspection.

<sup>&</sup>lt;sup>1</sup> VHA medical facilities are classified according to a complexity model; a designation of "2" indicates a facility with "medium volume, low risk patients, few complex clinical programs, and small or no research and teaching programs." VHA Office of Productivity, Efficiency & Staffing (OPES), "VHA Facility Complexity Model Fact Sheet," October 1, 2020. An affiliated facility is associated with a medical residency program. VHA Directive 1400.03, *Educational Relationships*, February 23, 2022.

# **Appendix C: VISN Director Comments**

#### **Department of Veterans Affairs Memorandum**

- Date: December 20, 2023
- From: Director, VISN 4: VA Healthcare (10N4)
- Subj: Comprehensive Healthcare Inspection of the Wilmington VA Medical Center in Delaware
- To: Director, Office of Healthcare Inspections (54CH00) Director, GAO/OIG Accountability Liaison (VHA 10B GOAL Action)
  - 1. Thank you for the opportunity to review the draft report, Comprehensive Healthcare Inspection of the Wilmington VA Medical Center in Delaware.
  - 2. I have reviewed the recommendations in the OIG draft report. I concur with the recommendations and action plan submitted by the Wilmington VA Medical Center.

(Original signed by:)

Timothy W. Liezert Network Director, VISN 4

### **Appendix D: Medical Center Director Comments**

#### **Department of Veterans Affairs Memorandum**

- Date: December 19, 2023
- From: Director, Wilmington VA Medical Center (460)
- Subj: Comprehensive Healthcare Inspection of the Wilmington VA Medical Center in Delaware
- To: Director, VISN 4: VA Healthcare (10N4)
  - 1. I have reviewed the findings from the VA Wilmington Healthcare System Comprehensive Healthcare Inspection Program (CHIP) reviewed by the Office of the Inspector General (OIG) conducted February 27, 2023 to March 3, 2023 and concur with the recommendations.
  - 2. I am submitting the facility plan to correct these findings and will monitor for compliance.
  - 3. I appreciate the OIG's review and look forward to our partnership for continued compliance and improvements.

(Original signed by:) VAMSEE POTLURI

# **OIG Contact and Staff Acknowledgments**

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