



US DEPARTMENT OF VETERANS AFFAIRS OFFICE OF INSPECTOR GENERAL

Office of Healthcare Inspections

VETERANS HEALTH ADMINISTRATION

Veterans Health Administration's Failure to Properly Identify and Exclude Ineligible Providers from the VA Community Care Program

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Executive Summary

The VA Office of Inspector General (OIG) conducted a focused national review to assess concerns with Veterans Health Administration's (VHA's) process to identify providers who have been removed from VA employment due to violations of policy "relating to the delivery of safe and appropriate care" and exclude those providers from the VA Community Care Program (VCCP), as required by the VA Maintaining Internal Systems and Strengthening Integrated Outside Networks Act of 2018 (MISSION Act).¹ The OIG issued this brief report to provide timely oversight and share concerns to facilitate VA action.

On April 26, 2022, the OIG initiated a healthcare inspection to review a former VA provider's eligibility to participate in the VCCP.² During preliminary data review for the inspection, the OIG identified paid community care claims associated with healthcare providers VHA previously identified as ineligible to deliver such care. However, deficiencies in VHA's process to identify providers who should be excluded precluded a complete evaluation of the exclusion process. As a result, this inspection focused on the initial steps to identify ineligible providers for exclusion. The OIG remains concerned about VHA's inability to exclude and prevent ineligible healthcare providers from delivering care to veterans through the VCCP.

Section 108a of the MISSION Act states that VA "shall deny or revoke the eligibility of a health care provider to provide non-Departmental health care services to veterans. . ." if the provider was removed from VA employment for violating VA policy "relating to the delivery of safe and appropriate health care."³ VHA's Office of Integrated Veteran Care (IVC) administers the VCCP and outlines the process for excluding providers from the community care program who are ineligible due to removal from VA employment.⁴

IVC staff compile a list of healthcare providers who were removed from VA employment within the prior two weeks using an automated query of HR Smart administrative data.⁵ The query

¹ VA Maintaining Internal Systems and Strengthening Integrated Outside Networks (MISSION) Act of 2018, Pub. L. No. 115-182, 132 Stat. 1393 (2018).

² VA OIG, [*Deficiencies in the Community Care Network Credentialing Process of a Former VA Surgeon and Veterans Health Administration Oversight Failures*](#), Report No. 22-02294-42, January 4, 2024.

³ MISSION Act § 108, amended December 2022. For the purpose of implementation, VHA's process to identify "removed" providers includes multiple types of separations. As defined by the Office of Personnel Management, separations are actions that end employment with an agency and may include termination, removal, resignation in lieu of involuntary action, and retirement in lieu of involuntary action.

⁴ VA, "VHA Office of Community Care Provider Exclusion" (standard operating procedures), December 2021, amended and replaced by VA, "VHA Office of Integrated Veteran Care Provider Exclusion" (standard operating procedures), January 2023, the requirements in the 2021 standard operating procedure contain the same or similar language as the amended standard operating procedure.

⁵ HR Smart is VA's human resources system of record that contains personnel records for VA employees.

relies on two primary criteria to identify providers for exclusion from the VCCP. The first criterion uses the occupational series to identify healthcare providers.⁶ The second set of criteria are combinations of nature of action and legal authority codes used to process the personnel actions when employees are removed from VA employment.⁷ Once providers have been identified through this query, IVC staff exclude those providers by inactivating the providers' profiles in VA's master database of community providers, known as the Provider Profile Management System (PPMS). Providers excluded in PPMS cannot receive new authorizations to provide VA community care. VA community care staff reschedule appointments and provide care coordination with eligible VCCP providers for veterans who have open authorizations with excluded providers.⁸

The OIG found that VHA's process fails to identify all healthcare providers removed from VA employment. The criteria used in VHA's process to identify ineligible providers does not include all clinical occupations. VHA's query fails to capture 81 percent (61 of 75) of clinical occupations.⁹

The OIG determined that VHA's process also fails to accurately identify personnel actions that indicate healthcare providers were removed for violating policies relating to delivery of safe and appropriate care. The automated query of HR Smart data does not include some nature of action and legal authority code combinations that may be used when ineligible providers are removed from employment. Additionally, VHA acknowledged that some personnel actions to remove providers are processed without including a required legal authority code, however, the automated query does not account for these errors. For example, IVC staff did not consider excluding a clinical psychologist who was removed from employment because a legal authority code was not used in processing the personnel action.

Furthermore, VHA does not consider whether a provider was removed for reasons related to delivery of safe and appropriate care. In one instance, a VHA facility reported to the OIG that an

⁶ An occupational series is a four-digit number that corresponds with an employee's profession, such as the 0610 nurse series.

⁷ The Office of Personnel Management defines nature of action as "the phrase that explains the action that is occurring" and legal authority as "law, Executive Order, regulation, agency directive, or the instruction under which the personnel action is taken." Office of Personnel Management, "The Guide to Processing Personnel Actions," chap. 1 in *The Guide to Processing Personnel Actions* (no date), accessed December 5, 2023, <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/personnel-documentation/processing-personnel-actions/gppa01.pdf>.

⁸ VA, *VHA Office of Community Care Provider Exclusion* (standard operating procedures), December 2021, amended and replaced by VA, *VHA Office of Integrated Veteran Care Provider Exclusion* (standard operating procedures), January 2023, the requirements in the 2021 standard operating procedure contain the same or similar language as the amended standard operating procedure.

⁹ Multiple clinical occupations may be classified under the same occupational series; for example, acupuncturists and chiropractors are not captured in VHA's query because they are both classified under the 0601 General Health Science occupational series.

excluded physician resigned voluntarily and had no conduct or performance issues related to the care of patients. However, VHA's process did not discern that the physician's removal was unrelated to patient care, and as a result, inappropriately excluded the physician from delivering care to veterans through the VCCP. These process failures result in both inclusion of ineligible providers and exclusion of eligible providers from the VCCP.

The OIG made two recommendations to the Under Secretary for Health related to the criteria and processes used to identify and exclude ineligible healthcare providers from the VCCP, and reviewing previous personnel actions to determine whether the reason(s) for those removals were for violation of policy related to the delivery of safe and appropriate care.

Comments

The Under Secretary for Health concurred with the recommendations and provided an acceptable action plan (see appendix B). The OIG will follow up on the planned actions until they are completed.



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Abbreviations

GAO	Government Accountability Office
IVC	Integrated Veteran Care
OIG	Office of Inspector General
OPM	Office of Personnel Management
PPMS	Provider Profile Management System
VCCP	VA Community Care Program
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network



Introduction

The VA Office of Inspector General (OIG) conducted a focused national review to assess concerns with Veterans Health Administration's (VHA's) process to identify providers who have been removed from VA employment due to violations of policy "relating to the delivery of safe and appropriate care" and exclude those providers from the VA Community Care Program (VCCP).¹ The OIG issued this brief report to provide timely oversight and share concerns to facilitate VA action.

MISSION Act

In June 2018, Congress passed the John S. McCain III, Daniel K. Akaka, and Samuel R. Johnson VA Maintaining Internal Systems and Strengthening Integrated Outside Networks Act of 2018 (MISSION Act) to provide more choices and better care coordination for veteran healthcare services.² The MISSION Act streamlined multiple VA community care programs into one consolidated program, known as the VCCP. Additionally, the MISSION Act established provider exclusion criteria to prevent former VHA providers removed from VA employment from delivering care to veterans through the VCCP.

Through the VCCP, eligible veterans receive hospital care, medical services, and extended care services from a network of non-VA healthcare providers. VHA's Office of Integrated Veteran Care (IVC) administers the community care program. IVC is responsible for excluding providers from the community care program who are ineligible due to removal from VA employment. According to IVC's standard operating procedure, "(e)xcluded providers will be prevented from receiving new authorizations from VA and completing open and future appointments with Veterans. . . ."³

Concerns

On April 26, 2022, the OIG initiated a healthcare inspection to review a former VA provider's eligibility to participate in the VCCP.⁴ During preliminary data review for the inspection, the

¹ VA Maintaining Internal Systems and Strengthening Integrated Outside Networks (MISSION) Act of 2018, Pub. L. No. 115-182, 132 Stat. 1393 (2018).

² VA Maintaining Internal Systems and Strengthening Integrated Outside Networks (MISSION) Act of 2018, Pub. L. No. 115-182, 132 Stat. 1393 (2018).

³ VA, *VHA Office of Community Care Provider Exclusion* (standard operating procedures), December 2021, amended and replaced by VA, *VHA Office of Integrated Veteran Care Provider Exclusion* (standard operating procedures), January 2023, the requirements in the 2021 standard operating procedure contain the same or similar language as the amended standard operating procedure.

⁴ VA OIG, [*Deficiencies in the Community Care Network Credentialing Process of a Former VA Surgeon and Veterans Health Administration Oversight Failures*](#), Report No. 22-02294-42, January 4, 2024.

OIG identified paid community care claims associated with healthcare providers VHA previously identified as ineligible to deliver such care. The OIG initiated this national review to examine IVC's processes that should have excluded ineligible providers from delivering care to veterans through the VCCP. However, deficiencies in VHA's process to identify ineligible providers precluded a complete evaluation of the exclusion process.

As a result, this report is focused on the initial steps to identify ineligible providers for exclusion. The OIG remains concerned about VHA's inability to exclude and prevent ineligible healthcare providers from delivering care to veterans through the VCCP.

Scope and Methodology

The OIG initiated the review on June 21, 2022. The review included interviews with VA staff and analysis of HR Smart administrative data associated with separations of VHA healthcare providers.⁵ The OIG reviewed relevant public laws as well as VA and VHA policies. Other documents reviewed included emails, data spreadsheets, and documents related to the IVC processes for excluding ineligible healthcare providers from the VCCP.

The OIG did not independently verify VHA data for accuracy or completeness.

In the absence of current VA or VHA policy, the OIG considered previous guidance to be in effect until superseded by an updated or recertified directive, handbook, or other policy document on the same or similar issue(s).

Oversight authority to review the programs and operations of VA medical facilities is authorized by the Inspector General Act of 1978, as amended, 5 U.S.C. §§ 401–424. 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.

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

⁵ HR Smart is VA's human resources system of record that contains personnel records for VA employees.

Inspection Results

VHA Failed to Properly Identify Ineligible Healthcare Providers for Exclusion from the VCCP

The OIG found process errors in VHA's method to identify healthcare providers removed from VA employment for violations of policy related to the delivery of "safe and appropriate care." Failure to reliably identify those providers compromises VHA's ability to meet the MISSION Act's requirements because the process results in both inclusion of ineligible providers and the exclusion of eligible providers from the VCCP.

Relevant Policy

MISSION Act section 108a requires that "the Secretary of Veterans Affairs shall deny or revoke the eligibility of a health care provider to provide non-Department health care services to veterans if . . .the health care provider was removed from employment. . .due to conduct that violated a policy. . . relating to the delivery of safe and appropriate health care."⁶

VHA indicated that, for the purposes of implementing the MISSION Act, "health care provider(s)" were those employees in occupations with a clinical designation.⁷ To identify ineligible providers "removed" from employment, VHA reported that multiple types of separations as defined by Office of Personnel Management (OPM) could apply including terminations, terminations during a trial or probationary period, and removals. However, VHA also noted that the type of separation, in and of itself, does not specifically indicate a provider's eligibility because some of the included separation types occur for reasons that do not render a provider ineligible under the MISSION Act. A case-by-case review of additional information beyond the type of separation is required to determine if the reasons an employee was removed were related to "delivery of safe and appropriate care."

VHA's Process for Excluding VA Providers

To identify and exclude providers from the community care program, IVC staff compile a list of healthcare providers who were removed from VA employment within the prior two weeks using an automated query of HR Smart administrative data.⁸ The query relies on two primary criteria to

⁶ VA Maintaining Internal Systems and Strengthening Integrated Outside Networks (MISSION) Act of 2018, Pub. L. No. 115-182, 132 Stat. 1393 (2018) § 108(a). MISSION Act section 108 amended December 2022.

⁷ VHA Workforce Management and Consulting Office, *VHA Workforce and Succession Strategic Plan, FY 2020-21*. Clinical occupations are defined as "personnel who provide direct patient care or services incident to patient care, and whose efforts have a therapeutic intent (e.g., physical, mental, social, spiritual)."

⁸ VA, VHA Office of Community Care Provider Exclusion, amended and replaced by VA, VHA Office of Integrated Veteran Care Provider Exclusion.

identify providers for exclusion from the VCCP. The first criterion uses the occupational series to identify healthcare providers.⁹ The second set of criteria are combinations of nature of action and legal authority codes used to process the personnel actions when employees are removed from VA employment.¹⁰

IVC staff exclude providers who are identified through this method by inactivating the provider's profile in VA's master database of community providers, known as the Provider Profile Management System (PPMS). If an ineligible provider is not in PPMS, IVC staff add the provider to the system; once added, the provider's profile is inactivated. Providers excluded in PPMS cannot receive new authorizations to provide VA community care. Excluded providers with scheduled appointments or authorization for community care prior to inactivation are identified by VHA facility staff using the Provider Exclusionary Management Report. The Provider Exclusionary Management Report identifies providers with an active authorization but are inactive in PPMS. VA community care staff reschedule appointments and provide care coordination with eligible VCCP providers for veterans with open authorizations with excluded providers.¹¹ Figure 1 displays VHA's process to exclude providers from the VCCP.

⁹ An occupational series is a numerical code that corresponds with an employee's profession, such as the 0610 Nurse series.

¹⁰ OPM defines nature of action as "the phrase that explains the action that is occurring" and legal authority as "law, Executive Order, regulation, agency directive, or the instruction under which the personnel action is taken." Office of Personnel Management, "The Guide to Processing Personnel Actions," chap. 1 in *The Guide to Processing Personnel Actions* (no date), accessed December 5, 2023, <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/personnel-documentation/processing-personnel-actions/gppa01.pdf>.

¹¹ VA, VHA Office of Community Care Provider Exclusion, amended and replaced by VA, VHA Office of Integrated Veteran Care Provider Exclusion.

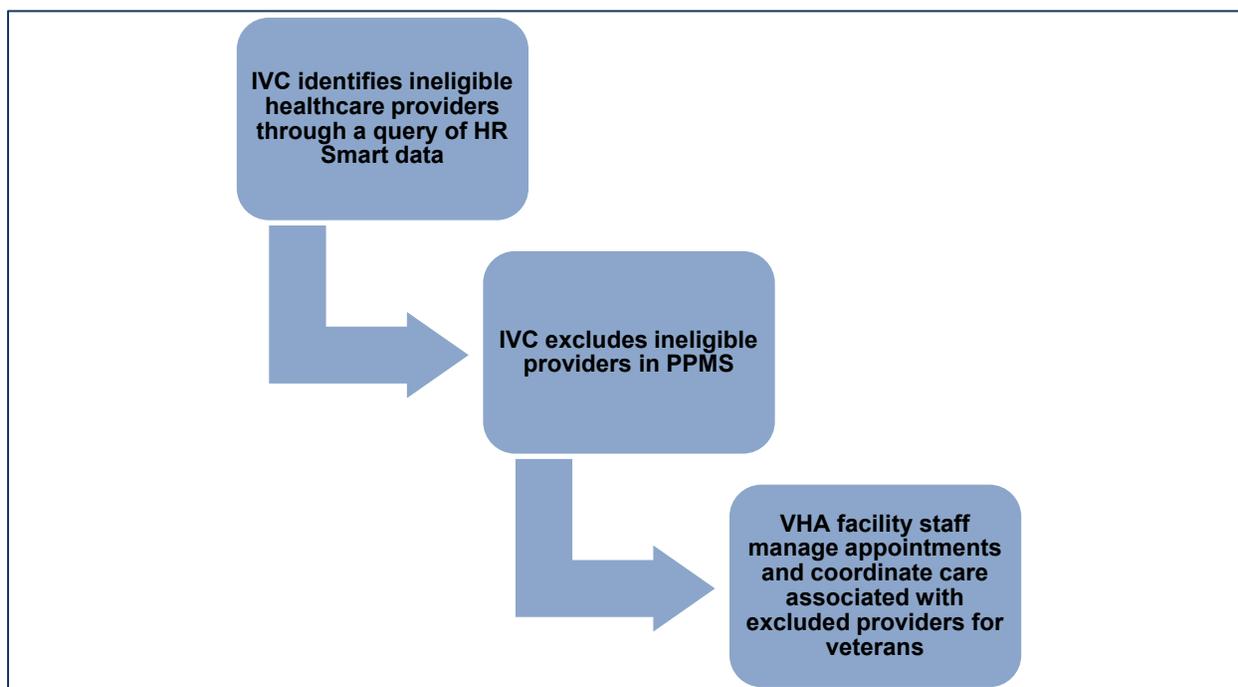


Figure 1. IVC's process to exclude providers ineligible under MISSION Act section 108(a)(1). Source: VA, VHA Office of Community Care Provider Exclusion, amended and replaced by VA, VHA Office of Integrated Veteran Care Provider Exclusion.

Findings

The OIG made the following determinations.

IVC's process fails to identify all healthcare providers removed from VA employment. IVC's automated query of HR Smart data does not include all of the occupational series that VHA designates for clinical occupations when identifying healthcare providers for exclusion under MISSION Act section 108(a)(1). VHA's query fails to capture 81 percent (61 of 75) of clinical occupations.¹²

For instance, licensed professional mental health counselors removed from employment would not be identified for potential exclusion from the VCCP because the associated occupational series are not used in the query.¹³ Without accurately identifying the population of healthcare

¹² Multiple clinical occupations may be classified under the same occupational series; for example, acupuncturists and chiropractors are not captured in VHA's query because they are both classified under the 0601 General Health Science series.

¹³ Government Accountability Office (GAO), Veterans Community Care Program: Immediate Actions Needed to Ensure Health Providers Associated with Poor Quality Care are Excluded, Report No. GAO-21-71, February 2021. The GAO report indicated that VHA amended its process to include mental health counselors in response to the GAO's inquiry. However, at the time of this review, neither the 0101 Social Science series nor 0183 Licensed Professional Mental Health series used for mental health counselors were included in VHA's query to identify healthcare providers for exclusion.

providers through its query, IVC fails to exclude all ineligible providers from the VCCP. See appendix A for a complete list of occupations designated as clinical and those occupations not included in the review of providers separated from VA employment.

IVC's process fails to accurately identify personnel actions that indicate healthcare providers were removed for violating policies relating to delivery of safe and appropriate care. The automated query of HR Smart data does not include some nature of action and legal authority code combinations that may be used when a provider is removed for violations of policy related to the delivery of safe and appropriate care. For example, the 357 nature of action code in combination with the ZLL legal authority code may be used when a provider is removed because of the “employee's conduct or delinquency after entrance on duty *and* because of unacceptable performance [emphasis in original text].” However, this combination is not included in the query, and as a result, ineligible providers removed under this authority would not be considered for exclusion. Additionally, VHA acknowledged that some personnel actions to remove providers are processed without including a required legal authority code, however, the automated query does not account for these errors. For example, IVC staff did not consider excluding a clinical psychologist who was removed from VA employment because a legal authority code was not used in processing the personnel action. As a result of this flawed query, VHA cannot accurately identify all removals from VA employment that disqualify healthcare providers from the VCCP.

IVC's process does not consider whether providers were removed for violations of policy related to the delivery of safe and appropriate care. VHA's reliance on nature of action and legal authority code combinations to identify ineligible former VA providers for exclusion from the VCCP is insufficient for the purpose of complying with section 108a(1) of the MISSION Act. According to VHA, “the nature of action and legal authority are only indicative of the type of separation. . . specific indicators of the nature of the conduct itself would be documented on the SF50 [standard form 50].”¹⁴ Therefore, a case-by-case review of additional information beyond the nature of action and legal authority is needed to determine if the action was a result of a policy violation related to the delivery of safe and appropriate care. In one instance, a VHA facility reported to the OIG that an excluded physician resigned voluntarily from VA employment and had no conduct or performance issues related to the care of patients. However, VHA's process did not discern the underlying reasons for the provider's removal from employment. Failing to consider the reasons for which providers are removed results in exclusion of those who should be eligible to provide care to veterans through the VCCP.

¹⁴ Standard Form 50 (SF50) is the notification of personnel action form, Office of Personnel Management, *Questions and Answers*, accessed November 11, 2023, <https://www.opm.gov/frequently-asked-questions/>.

Conclusion

Without reliably identifying healthcare providers removed from VA employment for violations of policy related to delivery of safe and appropriate care, VHA cannot properly exclude providers from caring for veterans in the community. The criteria used in VHA's process to identify ineligible providers does not include all clinical occupations or types of personnel actions that would be used to remove those providers. Furthermore, VHA does not consider whether a provider was removed for reasons related to delivery of safe and appropriate care. The failure to properly identify ineligible healthcare providers results in both inclusion of ineligible and exclusion of eligible providers from the VCCP.

Recommendations 1–2

1. The Under Secretary for Health reviews the criteria and processes used to identify and exclude healthcare providers removed from VA employment for violation of policy related to safe and appropriate care of veterans, and takes action as warranted.
2. The Under Secretary for Health reviews previous removals of healthcare providers from VA employment as required by VA Maintaining Internal Systems and Strengthening Integrated Outside Networks Act of 2018 § 108 to determine whether the reason(s) for those removals were for violation of policy related to the safe and appropriate care of veterans, and takes action as warranted.

Appendix A: List of VHA Clinical Occupations

Table A.1. List of VHA Clinical Occupations

Occupational Series	Clinical Occupation	Included in VHA's Process to Identify Healthcare Providers for Exclusion
0602	Medical Officer	Yes
0610	Nurse	Yes
0180	Psychology	Yes
0603	Physician's Assistant	Yes
0630	Dietitian and Nutritionist	Yes
0631	Occupational Therapist	Yes
0633	Physical Therapist	Yes
0638	Recreation/Creative Arts Therapist	Yes
0644	Medical Technologist	Yes
0660	Pharmacist	Yes
0662	Optometrist	Yes
0665	Speech Pathology and Audiology	Yes
0668	Podiatrist	Yes
0680	Dental Officer	Yes
0060	0060 Chaplain	No
0101	Social Science (Title 5)	No
0101	Social Science/Licensed Prof Mental Health Counselor	No
0101	Social Service/Marriage Family Therapist	No
0102	Social Science Aid and Technician	No
0181	Psychology Aid and Technician	No
0182	Marriage Family Therapist (replaces positions previously under 0101 series)	No
0183	Licensed Professional Mental Health Counselor (replaces positions previously under 0101 series)	No
0184	Sociology	No
0185	Social Work	No
0186	Social Services Aid and Assistant	No
0187	Social Services	No
0188	Recreation Specialist	No

Veterans Health Administration's Failure to Properly Identify and Exclude Ineligible Providers from the VA Community Care Program

Occupational Series	Clinical Occupation	Included in VHA's Process to Identify Healthcare Providers for Exclusion
0189	Recreation Aid and Assistant	No
0199	Social Science Student Trainee	No
0440	Genetics	No
0601	General Health Science (Title 5)	No
0601	General Health Science/Acupuncturist	No
0601	General Health Science/Blind Rehab	No
0601	General Health Science/Chiropractor	No
0601	General Health Science/Expanded Dental Function	No
0601	General Health Science/Genetic Counselor	No
0601	General Health Science/Nuclear Medicine Technologist	No
0601	General Health Science/Registered Respiratory Therapist	No
0601	General Health Science/Therapeutic Medical Physicist	No
0601	General Health Science/Cytotechnologist	No
0601	General Health Science/Histopathology Technologist	No
0601	General Health Science/Clinical Perfusionist	No
0605	Nurse Anesthetist	No
0620	Practical Nurse	No
0621	Nursing Assistant	No
0635	Corrective Therapist	No
0636	Rehabilitation Therapy Assistant (Title 5)	No
0636	Rehabilitation Therapy Assistant/Occupational Therapy Assistant	No
0640	Health Aid and Technician (Title 5)	No
0640	Health Aid and Technician/Certified Respiratory Therapist	No
0640	Health Aid and Technician/Telehealth	No
0640	Health Aid and Technician/Massage Therapy	No
0640	Health Aid and Technician/Optometry	No
0640	Health Aid and Technician/Ophthalmology	No
0640	Health Aid and Technician/Eye Care	No

Veterans Health Administration's Failure to Properly Identify and Exclude Ineligible Providers from the
VA Community Care Program

Occupational Series	Clinical Occupation	Included in VHA's Process to Identify Healthcare Providers for Exclusion
0642	Nuclear Medicine Technician	No
0645	Medical Technician	No
0646	Pathology Technician (Title 5)	No
0646	Pathology Technician/Histopathology	No
0647	Diagnostic Radiologic Technologist	No
0648	Therapeutic Radiologic Technologist	No
0649	Medical Instrument Technician	No
0651	Respiratory Therapist	No
0661	Pharmacy Technician	No
0667	Orthotist and Prosthetist	No
0681	Dental Assistant	No
0682	Dental Hygiene	No
0683	Dental Laboratory Aid and Technician	No
0699	Medical and Health Student Trainee	No
1301	General Physical Science	No
1306	Health Physics	No
1310	Physics	No
1311	Physical Science Technician	No
1320	Chemistry	No
1715	Vocational Rehabilitation	No

Source: OIG analysis of clinical occupational series designated as clinical for FY 2023. VA, VHA Office of Community Care Provider Exclusion, amended and replaced by VA, VHA Office of Integrated Veteran Care Provider Exclusion

Note: This table does not include two occupational series used in VHA's exclusion process. These are the 0690 industrial hygiene series, which is not designated by VHA as a clinical occupation; and the 0696 consumer safety series, which is not used by VHA.

Appendix B: Office of the Under Secretary for Health Memorandum

Department of Veterans Affairs Memorandum

Date: March 5, 2024

From: Under Secretary for Health (10)

Subj: Office of Inspector General (OIG) Draft Report, Veterans Health Administration's Failure to Properly Identify and Exclude Ineligible Providers from the VA Community Care Program (VIEWS 11451902)

To: Assistant Inspector General for Healthcare Inspections (54)

1. Thank you for providing the opportunity to review and comment on the OIG draft report regarding the process of excluding providers from the community care network. The Veterans Health Administration (VHA) concurs with the recommendations and provides an action plan in the attachment.
2. VHA appreciates the work performed by the OIG. The continued partnership with the OIG is critical to ensuring Veterans receive the same high level of care in the community as they would receive at a VA facility.
3. Comments regarding the contents of this memorandum may be directed to the GAO OIG Accountability Liaison Office at VHA10BGOALACTION@va.gov.

(Original signed by:)

Shereef Elnahal, M.D., MBA

Attachment

Office of the Under Secretary for Health Response

VETERANS HEALTH ADMINISTRATION (VHA)

Action Plan

Veterans Health Administration's Failure to Properly Identify and Exclude Ineligible Providers from the VA Community Care Program (2022-02398-HI-1264)

Recommendation 1. The USH reviews the criteria and processes used to identify and exclude healthcare providers removed from VA employment for violation of policy related to safe and appropriate care of veterans, and takes action as warranted.

VHA Comments: Concur

Providing Veterans with safe and high-quality healthcare is of paramount importance and VHA strongly agrees that healthcare providers removed from VA employment for violations related to safe and appropriate care of Veterans should be excluded from our community care programs. VHA will review the criteria and processes used to ensure that healthcare providers who were removed from VA employment due to patient safety concerns are excluded from our community care programs. The Office of Human Capital Management, Integrated Veteran Care, Field Operations, and additional subject experts (e.g., VHA Credentialing and Privileging) will review the criteria and processes and make improvements as warranted.

Status: In Progress

Target Completion Date: February 2025

Recommendation 2. The USH reviews previous removals of healthcare providers from VA employment as required by the VA Maintaining Internal Systems and Strengthening Integrated Outside Networks Act of 2018 § 108 to determine whether the reason(s) for those removals were for violation of policy related to the safe and appropriate care of veterans, and takes action as warranted.

VHA Comments: Concur

The Office of Human Capital Management, Integrated Veteran Care, and Field Operations, in addition to subject experts (e.g., VHA Credentialing and Privileging), will determine the appropriate review process to determine if removals of healthcare personnel were associated with patient safety concerns. Appropriate corrective actions will be implemented to ensure any providers identified are communicated to third-party network contractors and removed from the community care network. Any additional required notifications will also take place as warranted.

Status: In Progress

Target Completion Date: February 2025

OIG Contact and Staff Acknowledgments

Contact For more information about this report, please contact the Office of Inspector General at (202) 461-4720.

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