

**ADMINISTRATIVE SUMMARY OF INVESTIGATION  
BY THE VA OFFICE OF INSPECTOR GENERAL  
IN RESPONSE TO ALLEGATIONS  
REGARDING PATIENT WAIT TIMES**



**VA Medical Center in American Lake, Washington  
March 25, 2016**

**1. Summary of Why the Investigation Was Initiated**

The investigation was initiated based on information received through the Department of Veterans Affairs (VA) Office of Inspector General (OIG) Hotline from a former VA employee who alleged that a manager for the Non-VA Care Program (NVACP) at the VA Medical Center (VAMC) American Lake instructed schedulers to fabricate veteran contact dates, in order to artificially lower the number of outstanding fee-based referrals in the VA Puget Sound Healthcare System (VAPSHS) area of operation. The complainant also alleged that the NVACP manager had mistreated the complainant, and that she was borderline abusive to other employees.

**2. Description of the Conduct of the Investigation**

- **Interviews Conducted:** VA OIG interviewed the complainant, the NVACP manager, seven NVACP schedulers, and a program analyst.
- **Records Reviewed:** VA OIG reviewed Non-VA Care Coordination (NVCC) records in the Microsoft Access database.

**3. Summary of the Evidence Obtained From the Investigation**

**Interviews Conducted**

- The complainant alleged that the chief, NVACP, encouraged schedulers to fabricate the dates that NVACP schedulers had contacted or attempted to contact veterans to notify them of their eligibility for medical appointments in the community. The complainant alleged that schedulers input fictitious contact date information into the NVACP database. The complainant claimed the NVACP schedulers backfilled contact dates in veterans' profiles without ever attempting to contact the patients. The complainant stated that a manager for NVACP characterized the practice as filling in past dates of attempted contact when the scheduler "forgot" originally to input the contact. However, the complainant advised the dates were actually fabricated. The complainant was never instructed to change specific veteran contact dates by the manager. The complainant described the manager's instruction to fill in missing contact dates as "general marching orders." The complainant did not provide further details as to those instructions.
- The NVACP manager advised that, in approximately March 2014, VA management instructed her that all three veteran contacts (phone/mail/phone) needed to be recorded in the NVACP Microsoft Access database. Prior to March 2014, NVACP schedulers input veteran contact data into the Microsoft Access database; however, each new veteran contact input record entered into the database could have been erased or overwritten in

the database as NVACP schedulers were not aware that they were supposed to keep records of all contacts. She stated that since approximately March 2014, NVACP schedulers were instructed to input and maintain all veteran contact data in the Microsoft Access database system.

At the time of the interview, NVACP veteran contacts were recorded in multiple VA electronic records systems, to include the NVACP Microsoft Access database, Veterans Health Information Systems and Technology Architecture (VistA) and the Fee Basis Claims System. The NVACP manager determined that missing contact dates for the veterans needed to be re-created to fulfill the administrative mandate that all three contacts be listed in the Microsoft Access database. She created a methodology in which initial contact dates were re-created based on the date of the second contact.

NVACP schedulers' initial contacts with veterans were always conducted by phone. In cases when the NVACP scheduler did not speak with the veteran on the first call attempt, a letter was sent to the veteran's mailing address that same day or the next day. The NVACP manager stated that NVACP managers instructed schedulers to use the date of the letter as the initial attempted telephonic contact date. The manager stated that she also established a protocol to input the mailing date of contact as the first contact if that record had been erased by the system, as contact letters were sent immediately following an unsuccessful first call. She denied instructing schedulers to make up contact dates in instances in which no contact was made with the veteran. She stated she created and implemented the date re-creation program on her own, and her management was not aware of the process used to re-create the dates in a Microsoft Access database. The date re-creation process was an administrative fix to capture the data of all the veteran contacts and attempted contacts that had been made by employees in her unit.

- OIG interviewed seven NVACP schedulers who worked for the manager at VAMC American Lake. In summary, all of these schedulers advised that they had never been instructed to, nor had they, input fictitious dates of veteran contacts into the database system. They advised that they had, to the best of their ability, re-created actual dates of contact that were either not recorded or no longer in the database.
- A program analyst stated that for the past 2 to 3 years, the Microsoft Access infrastructure was used to log patient contacts. The database consisted of multiple columns to input patient information, including first, second, and third veteran contacts. He advised the only time patient contacts could be overwritten is if a scheduler made a mistake by deleting the contact or overwriting past contact dates with new ones. At the time of the interview, NVACP used Fee Basis Claims System and the Computerized Patient Record System to document veteran contacts, and both systems kept a chronological running log of case notes. He advised he would look at historical Microsoft Access logs and databases and provided a sample to OIG as a possible way to determine if logged dates were overwritten.

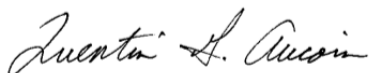
## **Records Reviewed**

- Review of a sample of the NVACP Microsoft Access database input form used by schedulers to enter veteran contacts disclosed that the data in columns, including contact dates, could be overwritten. The program analyst who gave OIG the sample provided the following information in an email, “As you navigate through the sample, you will see examples of how dates can be overridden by simply replacing it with a new one. Also, please keep in mind that not every veteran receives a letter or a second call. Many of them are contacted on the first attempt and are walked through the process all in one shot.”
- The program analyst provided a Microsoft Access database table excerpt containing the name and identifying information for 25 veterans contacted by NVACP from January through February 2014. The excerpt table data included veteran contact dates, scheduler names, and provider information. The VA OIG Office of Healthcare Inspections (OHI) reviewed the medical records of the veterans listed. The OHI review of this sample indicated all veterans received their prescribed non-VA appointment, and that all but one case was properly documented. In that case, the veteran had received care; however, no scanned documentation from the vendor was in the veteran’s file documenting the visit.

#### 4. Conclusion

The investigation determined that the NVACP manager did instruct schedulers to re-create NVACP veteran contact dates in an internal Microsoft Access scheduling database system in order to capture contacts and attempted contacts that had occurred, but that had not been properly recorded in the database system. We did not substantiate the allegation that the NVACP manager abused schedulers.

The OIG referred the Report of Investigation to VA’s Office of Accountability Review on September 4, 2015.



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