Memorandum to the File Case Closure

Alleged Misuse of Government Resources VHA Office of Informatics and Analytics, Washington, DC (2011-04536-IQ-0003)

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The VA Office of Inspector General Administrative Investigations Division investigated an allegation that, in 2011, OIA misused Government resources to travel to Hawaii for "brainstorming" meetings with members of her staff, the VA eHealth University (VeHU) To assess this allegation, we interviewed who is supervisor; and other knowledgeable witnesses. We also reviewed s travel records, articles on DoD/VA integrated electronic health records (iEHR), and applicable Federal laws, regulations, and VA policy.
Standards
Federal travel regulations require that a Federal agency pay only those expenses that are essential to the transaction of official business and that employees exercise the same care in incurring expenses that a prudent person would exercise if traveling on personal business. 41 CFR § 301-2.2 and -2.3. They also require officials who authorize travel to consider (a) the need for the travel; (b) the use of travel substitutes [alternatives to travel]; (c) the most cost effective routing and means of accomplishing travel; and (d) the employee's travel plans, including plans to take leave in conjunction with travel. <u>Id.</u> , at 41 CFR § 301-71.107. Further, they state that the employee is responsible for any additional cost resulting from the unauthorized use of a commercial rental automobile for other than official travel-related purposes. <u>Id.</u> , at 301-10.453. VA policy states that use of a rental car for other than official travel is prohibited and that any additional costs incurred incidental to the use of a rental car for personal reasons will not be reimbursed. VA Financial Policy, Volume XIV, Chapter 3, Paragraph 030208A.
2011 Travel to Hawaii
Travel records reflected that traveled to Hawaii three times in 2011: May 20–28; June 14–18; and August 26 to September 4. Travel records also reflected that from June 12–14. Traveled to Kansas City, MO, for a "brainstorming" before her June 14 trip to Hawaii.
told us that, as OIA she was responsible for developing on-line training materials for the iEHR prototype, software that allows clinicians to view information from both DoD and VA health records on a single screen. (b) (7)(C) She explained, and published articles confirmed, that VA and DoD personnel at VA's Pacific Islands Health Care System (PIHCS) and Tripler Army Medical Center (TAMC), Honolulu, HI, jointly developed the iEHR prototype and that VA planned to deploy this software throughout the U.S. Is said that she traveled to Hawaii three times

in 2011 to develop training materials in preparation for the deployment of iEHR to the Federal Health Care Center (FHCC), North Chicago, IL, on December 1, 2011.

told us that she traveled to Hawaii in May 2011 for a series of "information meetings" with iEHR developers and support staff from PIHCS, TAMC, and VA's Office of Information & Technology (OI&T). She said that her role in these meeting was to advise on and needed to "roll out" iEHR throughout VA. She also said that the meetings were held over 3 days, from May 24-26 and that on the third day, May 27, VA Secretary Shinseki and several high-level VA officials. including the VA Chief Information Officer (CIO), arrived for a demonstration. Further, she said that she did not choose the venue for the May 2011 meetings but that she was invited to attend by Ol&T, and VHA, who were iEHR Project Managers told us that the meetings were held in Hawaii because the users and developers of iEHR were stationed in Hawaii, and the system was in use there. She said that she did not believe there were reasonable alternatives, i.e. teleconferencing, to holding face-to-face meetings with the users and developers of the system. She further said that by holding the meetings in Hawaii, instead of another venue, they could work with the clinicians who used the system without taking them away from their clinical duties for an extended period.

told us that before traveling to Hawaii on June 14, she met with VeHU in Kansas City for a 2-day "brainstorming" meeting. She said that the purpose of this meeting was to come up with ideas on how to present VeHU training in a "virtual" setting, due to the reduced travel budget for FY 2012. She further said that made up an to oversee the VeHU conference. She told us that they met in Kansas City, a central location, because the throughout the country.

told us that she traveled to Hawaii from June 14-18 to conduct user training/testing for iEHR in a "fictitious" environment in order to allow Members of Congress, DoD, and other stakeholders to view iEHR software without compromising (b) (7)(C)patient privacy. She said that attendees at these meetings, which were held at PIHCS, and included from the VA office who who used and in charge of She said that she observed provider training on iEHR to map out a plan for the "demonstration" account. software and met with She further said that they held the meeting in Hawaii, rather than on the mainland, were stationed in Hawaii because all the attendees, except for her and and other health care providers who used and because they could involve the system without removing them from their clinical duties for an extended period. She said that in-person meetings were the most efficient way to get the job done in a short time, because there was a push to get the demonstration accounts up and running within 3 weeks.

told us that she and a contractor employee traveled to Hawaii from August 26 to September 4, 2011, to create training videos for future users of iEHR

(b) (7)(C)

software. She said that these videos were created for users in at FHCC, North Chicago, when the system was deployed there in December 2011. She said that during this trip, she and the contractor created 13 training videos of practitioners conducting training on iEHR software. She said that she traveled to Hawaii to create the videos because the iEHR prototype was up and running at PIHCS and the subject matter experts, trainers, and users of the system were located there.

told us that, as s immediate supervisor, she was the final approving official for s 2011 travel. said that traveled to Hawaii three times in 2011 to develop training materials leading up to the deployment of the iEHR "presentation layer" (user interface) in North Chicago later that (b) (7)(C)had to travel to Hawaii to work with developers and year. She said that users of the iEHR presentation layer and that also made several trips to North Chicago in 2011 for the purpose of implementing it there. She said that, in her s three trips to Hawaii, and the associated expenses, were essential to the transaction of Government business. She said that she did not believe that there were any practical alternatives to travel in these instances. She further said traveled at the request of and who are the VHA and OI&T leads, respectively, for iEHR; the system was up and running in Hawaii; and system developers and clinical users were located there. told us that needed to work with the clinicians who used the system in order to develop a training plan for future clinical users.

Travel records reflected that in June 2011 traveled to Hawaii for "user testing/training" following a VeHU "brainstorming" meeting in Kansas told us that was in charge of the VeHU Conference for City. the past 10 years, which was held every year (or every other year) to train clinical (b) (7)(C)application coordinators and clinicians on the VA electronic health record. She said that, as part of the Government's effort to reduce the cost of conferences and travel, the met with the VeHU was being moved to a "virtual" environment and that track directors in Kansas City to discuss ideas for shifting it to a virtual environment. said that, following the meeting with the VeHU traveled to Hawaii to develop training materials for iEHR deployment. She further said that, over the summer months, the developers in Hawaii continued to refine iEHR in preparation for its deployment to North Chicago.

Travel records reflected that traveled to Hawaii from August 26 to September 4, 2011, to "create training videos for deployment of the presentation layer to North Chicago." told us that during that trip, recorded the practitioners who used the system to create training videos for use when the presentation layer was deployed in North Chicago later that year. She said that traveled to Hawaii, because the developers and clinicians who used the system were located there. Told us that there was no practical alternative to the system were located there. Told us that there was no practical alternative to the system were located there. Told us that there was no practical alternative to wideos while not on site.

told us that he was an iEHR and that he lead a team of clinical applications coordinators who were stationed in Hawaii where the prototype was

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1	developed. He said that was the VA lead for iEHR. said that he traveled to Hawaii from Bay Pines in May 2011 for a demonstration of the iEHR prototype in conjunction with VA Secretary Shinseki's visit. He said that also traveled to Hawaii in May 2011 for the demonstration and that saked to participate, since she was an expert on developing such demonstrations. He said that acceptance trials and development of training materials in preparation for the December 2011 deployment of the iEHR "presentation layer" in Chicago. To told us that, in his opinion, stravel to Hawaii was essential to the conduct of Government business. He said that traveled to Hawaii three times between May and September 2011, because the VA/DoD iEHR demonstration and deployment were on an accelerated schedule. He said that stravel deployment of the system.	(b) (7)(C)
	responsible for producing training videos and developing the on-line curriculum for webbased iEHR training and that traveled to Hawaii in May, June, and August 2011 for this purpose. She said that in May 2011 worked with her and the other trainers to become familiar with iEHR and observe iEHR training first-hand. She said that and the trainers discussed the content of iEHR training and the technical aspects and dissemination of the training products. She further said that watched her provide training to VA and DoD clinicians on May 25 and 26 and that recorded the training sessions on her iPhone in order to come up with a plan for the best way to present the material on-line. Told us that she used her personal iPhone and portable hard drive to record and store iEHR training videos. She said that the recorded videos contained no personal health information or other Privacy Act protected information, as they used a "demonstration" account containing fictitious data.	(b) (7)(C)
	said that two other individuals traveled from the mainland with May 2011. One was sassistant and the other was a database expert, who helped set up a "test account" for demonstration. Said that said that correct errors. In any further said that the purpose of the initial recording was to get an idea of what the videotaped training "would look like" and that they recorded and said training clinicians on iEHR. told us that said that said that they recorded and said that they recorded any said that	(b) (7)(C)
	very busy time" and that and her assistant spent Monday, Tuesday, and part of Wednesday (August 29–31) recording the training. She said that and her assistant then edited and posted videos on line. She further said that it required her and her and her assistant to do the videotaping effectively.	

s Personal Days in Conjunction with Travel to Hawaii.

told us that she took "personal days" (non-working days, travel comp time, and/or annual leave) in conjunction with her travel to Hawaii in May 2011 and again in August/September 2011, at no cost to VA. Travel records reflected that she requested 3 "personal days," May 21–23, in conjunction with her travel to Hawaii in May 2011 and that she did not claim lodging, per diem, or transportation expenses for these days. Travel records also reflected that she took 4 "personal days" in conjunction with her travel to Hawaii in August/September 2011 and that she did not claim lodging, per diem, or transportation expenses for these days.

(b) (7)(C)

told us that she kept her rental car while on "personal days" in conjunction with travel but that she did not seek reimbursement for the charges associated with the rental car on the days she was not conducting Government business. She said that after she returned from the last of her three trips she became aware of a requirement that, when combining personal days with official travel, the traveler must return the rental car used for Government business before taking leave or other personal days.

(b) (7)(C)

Federal travel regulations and VA policy state that cars rented for official travel may not be used for purposes other than official travel and any additional costs incidental to the personal use of a rental car will not be reimbursed. However, they do not explicitly state that the traveler must either return the car before taking personal time in conjunction with official travel or terminate the rental car contract with the rental agency and create a personal contract for use of the car on personal days. The OIA told us that when an OIA employee submitted a travel report showing only one contract for both official and personal use of a rental car, she required the employee to pay for the portion of the rental car bill attributable to personal use and advised the employee that, in the future, he or she should terminate the Government rental contract and have a new contract created for personal use. However, she said that OIA did not have a written policy to that effect. Travel records reflected that a did not claim reimbursement for the rental car, mileage, or parking for the personal days that she used the rental car.

Conclusion

We did not substantiate the allegation that for nonessential travel to Hawaii. Based on witnesses' testimony, we found that stravel to Hawaii in 2011 to develop was necessary for the expedited deployment of iEHR to North

Chicago in December 2011. Further, we found that her personal travel in conjunction with her official travel to Hawaii did not result in any additional costs to VA. In addition, we found that stravel in conjunction with official travel car while on personal days in conjunction with official travel and that there was no added cost to VA for her personal use of the rental car. Therefore, we are closing this investigation without issuing a formal report or memorandum.

Prepared by
Approved by:

6/12/2012 Date

Date