

15-00613-F001

From: Krause, Melanie R. (OIG)
Sent: Wednesday, October 22, 2014 11:40 AM
To: Krause, Melanie R. (OIG)
Subject: Upcoming OIG inspection

Good morning,

I am contacting you on behalf of the Office of Inspector General, Office of Healthcare Inspections. We recently began work to examine the following allegations:

1. Beginning in the 2011 timeframe, VA Maine Healthcare System leadership instructed staff to utilize the following inappropriate practices in order to meet VHA's mental health access-related benchmarks:
 - a. For an unspecified amount of time, discontinue using the consult package to track referrals for mental health services. In lieu of using the consult package, referrals were made via phone, in person or through "view alerts" in the patient records.
 - b. After resuming the use of the consult package to track referrals to mental health services, restrict who could submit mental health consults and implement practices to close consults before the requested services were rendered.
 - c. For an unspecified amount of time, included language in the consult package to direct providers not to request mental health consults if the patient was not willing to be seen within 14 days.
 - d. Utilize "intake workshops," mental health classes, or any other type of mental health-related individual or group session in order to meet VHA's benchmark for timely mental health assessments and "mental health workshops" to meet VHA's benchmark for timely follow up referrals, despite staff concerns about the clinical appropriateness of these practices.
 - e. For a several week period, in order to meet VHA's benchmark for same day access, discontinue scheduling mental health appointments in advance and instead utilize drop-in clinics.
 - f. Omit information related to mental health conditions that could be service connected from clinical notes in order to limit the number of veterans seeking mental health services.
 - g. (For LIPs) See patients for medication management, even though this was outside of their scope of practice.

2. Some of these inappropriate practices have persisted, despite an Administrative Review and reviews by VHA's Office of Mental Health Operations and National Center for Organizational Development.

We will be at the Togus VA Medical Center on October 27 – 29 and, during that time, we will be hosting a number of interviews. If you would like to meet with us separately to provide facts pertaining to the allegations listed above, please contact me directly so that we can arrange for a time to meet on or off-site or to talk over the phone.

Kind regards,
Melanie

Melanie Krause, PhD, RN
Associate Director,
Clinical Review Management
VA Office of Inspector General,
Office of Healthcare Inspections
Ph: (202) 461-4742

Brown, Austin F. Jr.

From: Pudlowski, Keith B.
Sent: Tuesday, October 28, 2014 9:21 AM
To: Brown, Austin F. Jr.
Cc: Tibbetts, Mary
Subject: FW: Notification and Document/Data Request for Healthcare Inspection: VA Maine Healthcare System
Attachments: Hotline Visit Notification Memo.doc
Signed By: keith.pudlowski2@va.gov

Austin,

Here is the e-mail from Dr Tibbetts that is requested by the KJ / FOIA.

v/r

Keith B. Pudlowski
Administrative Officer, Mental Health Services
VA Maine Healthcare Systems
(207) 623-8411 ext 5134

From: Tibbetts, Mary
Sent: Friday, October 17, 2014 1:12 PM
To: VWHATOG MHSALL
Cc: Murphy, Joel R.
Subject: FW: Notification and Document/Data Request for Healthcare Inspection: VA Maine Healthcare System

Colleagues,

We learned late yesterday afternoon that we are being visited by a team from the OIG specifically focusing on MH issues. A team of 4 OIG staff will be on the Togus campus from Monday-Wednesday October 27-29. Their stated purpose is to review "selected mental health-related clinical and administrative operations". Other service lines including CLC and Pharmacy have also had OIG reviews over the past year.

We are in the process of providing them with initially requested documents. However, as their visit proceeds they may request other documents or interview staff as they see fit. Please cooperate with them fully and honestly. MHS Administration may also ask for your help with certain documents or reports; please make yourself available for these requests.

We are a group of strong, dedicated healthcare professionals who provide excellent healthcare to Maine Veterans. I am proud of our staff and all of the hard work that we do for Maine Veterans. We are always interested in any guidance that will result in improved care to Veterans.

Thank you for your cooperation and support!

Mary

Mary W. Tibbetts, MD, MBA
Chief, Mental Health Services
VA Maine Healthcare System

15-00613-F003

207-623-8411 x4935

207-623-5748 fax

"BE KIND, FOR EVERYONE YOU MEET IS FIGHTING A HARD BATTLE."

-ATTRIBUTED TO PLATO

From: Krause, Melanie R. (OIG)

Sent: Thursday, October 16, 2014 10:42 AM

To: Lilly, Ryan S.; Mayo-Smith, Michael; VHA 10AR MRS OIG Hotlines

Cc: Gudgell, Kathy (OIG); Julian, Terri (OIG); Mallinger, Alan (OIG)

Subject: Notification and Document/Data Request for Healthcare Inspection: VA Maine Healthcare System

Good morning,

The purpose of this email is to alert you to a hotline investigation that we recently initiated on alleged quality of mental health care issues at the VA Maine Healthcare System. As detailed in the attached memo, we are planning a site visit to the Togus VAMC beginning on Monday, October 27, 2014. At your earliest convenience, please assign a facility point of contact who we can work with on our documentation request and logistics of the site visit.

Please don't hesitate to contact me if you have any questions or concerns,
Melanie

Melanie Krause, PhD, RN

Associate Director,

Clinical Review Management

VA Office of Inspector General,

Office of Healthcare Inspections

Ph: (202) 461-4742

**Department of
Veterans
Affairs**

Memorandum

Date: October 15, 2014

From: Melanie Krause, PhD, RN, Office of Healthcare Inspections (54D)

Subj: Notification and Document/Data Request for Healthcare Inspection

To: Ryan Lilly, Director, VA Maine Healthcare System (402)
Michael Mayo-Smith, Network Director, VISN 1 (10N1)

This memo is to notify you that the Office of Inspector General (OIG) will conduct an onsite review at the Togus VAMC. We will be arriving on Monday, October 27, 2014, at approximately 8:00 am. We would like to meet with the facility director after morning report, if possible, on day one.

The purpose of our visit will be to review selected mental health-related clinical and administrative operations. OIG employees from the Office of Healthcare Inspections will perform the reviews.

The members of the review will be:

- Healthcare Inspections Medical Consultant: Alan Malinger, VA OIG Central Office
- Healthcare Inspections Team Leader: Melanie Krause, VA OIG Central Office
- Healthcare Inspections Team Member: Kathy Gudgell, VA OIG Central Office
- Healthcare Inspections Team Member: Terri Julian, VA OIG Baltimore Field Office

To facilitate the visit and to lessen any disruption in operations, we ask that you appoint a liaison representative for our visit. Once appointed, please have the liaison contact the Team Leader. In addition, facility supervisors and employees should be made aware of the visit.

In preparation for our visit, we would appreciate it if you would have the following information available to us no later than close of business on Monday, October 20, 2014:

- Overview of the VA Maine Healthcare System, in general, (e.g. a "trip pack") and mental health services available at the Togus VA medical center, in particular.
- Roster of names, titles, and hire date for all mental health staff.
- Copies of any VHA, VISN, and/or facility-level summaries/reviews from FY 2010 – FY 2014 related to mental health services at the Togus VA medical center, including, but not limited to the following:
 - OMHO Consultative Site Visit Report(s), including the report from the initial review in 2011/2012 as well as the report from any subsequent revisits,
 - Reports from the National Center for Organizational Design, and
 - Findings from pertinent Administrative Reviews.
- Local and VISN policies related to scheduling mental health appointments and entering or responding to mental health-related consults.

We also would like you to arrange interviews with the following staff:

1. Facility Director
2. Chief of Mental Health Services
3. Chief of HAS
4. [Additional staff interviews to be determined, pending review of the staff roster]

Allow 45-minutes for each individual interview, with 15-minutes between, and schedule interviews between 8:00 am-12:00 pm and 1:00pm – 4:00pm on Monday, October 27, and Tuesday, October 28; and Wednesday, October 29.

We would like to exit with the Facility Director at 4:30 pm on Wednesday, October 29, 2014.

All information should be saved and provided to OIG on a *secure* shared drive that is administered by the Facility. Please contact the Melanie Krause at 202-461-4742 if you need clarification concerning any of the requested information. After we receive the information, we may contact staff to discuss it in further detail. Please inform the liaison representative so that he/she will be prepared to direct us to the appropriate staff for our inquiries.

3. Finally, we will need a workroom for our four-person team that can also serve as an interview room. The room will need to be rekeyed and keys provided only to the team members. The workroom should be located away from the executive offices. Please ensure an Information Technology Representative is available to assist in providing a hardwire internet connection for the OIG team soon after the team's arrival on October 27.

4. Thank you for your assistance in this review of your facility. If you have any questions, please contact Melanie Krause at 202-461-4742. We look forward to meeting with you and your staff.

Respectfully,

Melanie Krause
Associate Director, VA OIG (54D)

cc: Director, Management Review Service (VHA 10AR MRS OIG Hotlines)
Jeanne Martin, Office of Healthcare Inspections (54BN)
Sean Smith, Office of Investigations (51MA)