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Office of Special Reviews

VETERANS HEALTH ADMINISTRATION

Former Orlando VA Medical Center Executive Violated Ethics Rules

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Executive Summary

On April 6, 2023, the Executive Leadership Board (ELB) for Veterans Integrated Service Network (VISN) 8 held a meeting in Gainesville, Florida.¹ During that meeting, a software development company and its partners gave a presentation promoting a mobile wayfinding application that veterans could download on their smartphones for navigating within a VA facility in real time. Tracy Skala, who at the time was the deputy director of the Orlando VA Medical Center, helped organize the presentation and attended the meeting, during which she praised the application.

Ms. Skala's son, an employee of the software developer and former VA employee, was one of the presenters at the ELB meeting. Ms. Skala did not disclose their relationship to the meeting attendees, and she and her son had different last names. A VISN 8 senior executive who attended the meeting later learned that Ms. Skala and one of the presenters were related, and promptly alerted the VA Office of Inspector General (OIG) regarding concerns about Ms. Skala's conduct. In addition, the day after the ELB meeting, the VISN director instructed all VISN employees to stop contact with the software developer and its partners that had been involved in the April 2023 presentation. In November 2023, Ms. Skala nonetheless directed the medical center's chief technology officer (CTO) to pursue an acquisition for the software developer's wayfinding application for the medical center. The CTO told investigators that the software developer where Ms. Skala's son was employed was the only company that could perform the required work. Ultimately, neither VISN 8 nor the medical center ever entered into a contract for the application.

The OIG opened an administrative investigation on October 23, 2023, to address allegations stemming from the ELB meeting.² Ms. Skala retired from VA in April 2024 while this investigation was ongoing. For more information on the scope and methodology of this investigation, see appendix A.

As a result of the investigation, the OIG made two findings. First, the OIG found that Ms. Skala attempted to use her public office for private gain on multiple occasions in violation of government ethics rules. Over a period of time before and after the April 2023 ELB meeting,

¹ The Veterans Health Administration (VHA) has divided the United States into 18 regional networks, known as VISNs, which it describes as regional systems of care working together to better meet local health care needs and provide greater access to care. "Veterans Integrated Service Networks (VISNs)" (web page), Veterans Health Administration, accessed August 7, 2024, <https://www.va.gov/HEALTH/visns.asp>. The VISN 8 ELB meetings are held multiple times a year, and attendees include senior leaders from the seven facilities in the VISN. Located in Tampa, Florida, VISN 8 serves Florida, southern Georgia, Puerto Rico, and the US Virgin Islands. "VISN 8" (web page), Veterans Health Administration, accessed December 11, 2024, <https://department.va.gov/integrated-service-networks/visn-08/>.

² The OIG first presented this information to the US Attorney's Office for the Middle District of Florida. The OIG then opened its administrative investigation into the alleged misconduct after the US Attorney's Office declined to pursue a criminal investigation.

Ms. Skala attempted to convince the CTO and her VISN colleagues to award contracts that would benefit her son's employer and, in turn, her son.

Second, the OIG found that during Ms. Skala's tenure at the medical center, she participated in multiple matters related to the software developer while her son was employed there without recusing herself, despite the appearance of a conflict of interest with her son's employer.³ Those matters include several meetings in early 2023, the ELB meeting itself, as well as Ms. Skala's interactions with the CTO, whom she directed to procure the wayfinding application for the medical center in both 2022 and 2023.

During this investigation, the OIG identified an additional matter outside the scope of the original allegations related to Ms. Skala's receipt of a critical skill incentive.⁴ Ms. Skala received a critical skill incentive in August 2023 but retired prior to completing the required service period associated with the incentive. Ms. Skala raised this issue proactively with VA human resources staff before her departure and expressed a desire to repay the relevant portion. VISN and medical center staff did not initiate the process to identify and recover any debt owed by Ms. Skala related to the remaining service obligation until September 2024, after the OIG inquired about the incentive.

Because Ms. Skala retired from VA, the OIG makes no recommendations with respect to her misconduct. The OIG made three recommendations on other related issues. First, the Veterans Health Administration (VHA) establishes a written policy or procedure to reasonably ensure that potential conflicts of interest or appearance of partiality concerns involving VHA employees are identified and remediated before contractor presentations to VISN or facility leaders. Second, VA confirms it has initiated the process to recover any debt owed by Ms. Skala to the federal government related to the critical skill incentive she received. Third, the assistant secretary for Human Resources and Administration/Operations, Security, and Preparedness directs a review to determine whether any VHA employee ranked GS-15 or above who was awarded a critical skill incentive left VA before completing their required service obligation, and, if so, whether VA has

³ 5 C.F.R. § 2635.502(a) & 502(e) (2023). 5 C.F.R. § 2635.502(a) & 502(e). These rules required Ms. Skala to "not participate in"— or, in other words, to *recuse* herself from—any matters involving potential contracts with her son's employer. 5 C.F.R. § 2635.502(a) & 502(e); see also *Merriam-Webster*, "recuse," accessed December 12, 2024, <https://www.merriam-webster.com/dictionary/recuse>.

⁴ Critical skill incentives are authorized under the Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act of 2022. Pub. L. No. 117-168, 136 Stat. 1759, 1815. The incentives are contingent on an employee completing a required service period. 38 U.S.C. § 706(d)(3). If an employee fails to complete a service obligation, per VA policy, the employee "shall be indebted to the Federal Government for incentive payments received in excess of the amount that would be attributable to the completed portion of the service period (i.e., prorated), and must repay the excess amount of the incentive unless a waiver is approved." VA Notice 23-03, *Department of Veterans Affairs Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act*, Critical Skill Incentive Implementation, February 17, 2023, para. 4(g).

established a debt and initiated recoupment in the amount of the payment attributable to the uncompleted period, and also takes any further corrective actions deemed warranted.

VA Comments and OIG Response

The acting under secretary for health, VISN 8 director, and assistant secretary for Human Resources and Administration/Operations, Security, and Preparedness reviewed the draft report. They concurred in principle with the OIG’s first recommendation and concurred with recommendations two and three.⁵ Their full responses are published as appendixes B, C, and D, respectively. The OIG acknowledges that VA provided acceptable action plans and completion timelines in response to the recommendations and will monitor their progress until sufficient documentation has been received to close them as implemented.



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⁵ The recommendations in this report are directed to anyone in an acting status or performing the delegable duties of the relevant positions. Recommendation 2 has been noted as “completed” but the recommendation was not requested to be closed and will be addressed during the OIG’s routine follow-up process.

⁶ Pursuant to the February 11, 2025, Presidential Action *Implementing The President’s “Department of Government Efficiency” Workforce Optimization Initiative (Workforce Optimization)* and subsequent guidance, the VA OIG is carrying out consolidation and efficiency actions over the next several months. Consequently, the Office of Special Reviews will not go forward as a separate directorate, and remaining staff are in the process of joining other directorates to continue to conduct impactful administrative investigations and provide e-discovery solutions under the Office of Investigations and the Office of the Counselor, as well as other work in furtherance of the OIG mission.

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Abbreviations

CSI	critical skill incentive
CTO	chief technology officer
ELB	Executive Leadership Board
ISSO	information security systems officer
OGE	Office of Government Ethics
OIG	Office of Inspector General
VHA	Veterans Health Administration
VISN	Veterans Integrated Service Network



Introduction

On April 6, 2023, the Executive Leadership Board (ELB) for Veterans Integrated Service Network (VISN) 8 held a meeting in Gainesville, Florida.⁷ VISN 8 is the largest system of VA hospitals and clinics, serving more than 1.4 million veterans across Florida, southern Georgia, Puerto Rico, and the US Virgin Islands.⁸ During the meeting, a software development company and its partners gave a presentation promoting a mobile wayfinding application that veterans could download on their smartphones in order to navigate within a VA facility in real time. Tracy Skala, then the deputy director of the Orlando VA Medical Center within VISN 8, helped organize the presentation and attended the meeting, where she actively commended the application. Ms. Skala's son, a former VA employee who left VA to work for the software developer in 2021 and had a different last name, also attended the meeting and was a presenter for the software developer.⁹ A VISN 8 senior executive who participated in the meeting later became aware that the two were related. He then contacted the VA Office of Inspector General (OIG) with his concerns that Ms. Skala had not disclosed this familial relationship, and that she had attempted to convince multiple senior members of the VISN to contract with her son's employer. The OIG presented this information to the US Attorney's Office for the Middle District of Florida, and, after it declined to pursue a criminal investigation, the OIG initiated an administrative investigation into the alleged misconduct on October 23, 2023.

From October 2023 through October 2024, the OIG interviewed employees of the medical center and VISN; reviewed nearly 5,000 documents, including emails, employment records, Microsoft Teams messages, bank records, and contracting documents; and analyzed applicable laws, regulations, and VA policy. During this investigation, the OIG identified an additional matter outside the scope of the original allegations related to Ms. Skala's receipt of a critical skill

⁷ The Veterans Health Administration (VHA) has divided the United States into 18 regional networks, known as VISNs, which it describes as regional systems of care working together to better meet local health care needs and provide greater access to care. "Veterans Integrated Service Networks (VISNs)" (web page), VHA, accessed August 7, 2024, <https://www.va.gov/HEALTH/visns.asp>. The VISN 8 ELB meetings are held multiple times a year, and attendees include senior leaders from the seven facilities in the VISN.

⁸ "VISN 8" (web page), Veterans Health Administration, accessed December 11, 2024, <https://department.va.gov/integrated-service-networks/visn-08/>.

⁹ As of September 2024, Ms. Skala's son was still employed by the software developer.

incentive payment.¹⁰ Ms. Skala retired from VA during the investigation. For more information on the scope and methodology of this administrative investigation, see appendix A.

Background

VA defines wayfinding as “the process of finding destinations” within its facilities.¹¹ Recognizing that navigating a VA medical facility can be a “complex and disorienting experience” for patients and lead to anxiety and confusion, VA uses a variety of wayfinding tools—such as signs and maps—to help people find their way in VA medical facilities.¹² Newer wayfinding tools include software on mobile devices that use indoor positioning systems to give turn-by-turn directions to individuals as they walk through VA facilities, such as the one that was the subject of the vendor presentations at the VISN 8 ELB meeting.¹³

According to the medical center’s chief technology officer (CTO), officials at the medical center have been interested for many years in identifying wayfinding technologies that would leverage the facility’s existing infrastructure (which includes Bluetooth low-energy antennae in the ceilings as hardware required for indoor wayfinding). In 2017, the medical center’s technology leaders and Ms. Skala’s son, who was then a VA program analyst, held meetings with companies including the software developer under discussion on how to use this existing infrastructure to adopt the mobile wayfinding application for smartphones. Following these meetings, the software developer created a test version of the application at no cost to VA to illustrate how it would function at the medical center.¹⁴ The CTO told OIG investigators that the medical center never entered into a contract for the wayfinding application, but the test version remained accessible to the public despite never being maintained or updated.¹⁵

Ms. Skala was employed by VA for 16 years. She served in several senior leadership positions in VISN 6, VISN 21, and finally in VISN 8. At VISN 8, she served as the medical center associate director in Orlando starting in June 2021 and was promoted to the position of deputy director of

¹⁰ Critical skill incentives are authorized under the Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act of 2022. Pub. L. No. 117-168, 136 Stat. 1759, 1815. The incentives are contingent on an employee completing a required service period. 38 U.S.C. § 706(d)(3). If an employee fails to complete a service obligation, per VA policy, the employee “shall be indebted to the Federal Government for incentive payments received in excess of the amount that would be attributable to the completed portion of the service period (i.e., prorated), and must repay the excess amount of the incentive unless a waiver is approved.” VA Notice 23-03, *Department of Veterans Affairs Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act*, Critical Skill Incentive Implementation, February 17, 2023, para. 4(g).

¹¹ VA Signage Design Manual PG-18-10, *Fundamentals of Wayfinding* (sec. 1.2), May 16, 2023.

¹² VA Signage Design Manual PG-18-10, *Fundamentals of Wayfinding*.

¹³ VA Signage Design Manual PG-18-10, *Fundamentals of Wayfinding*.

¹⁴ This test version of the application was never marketed to patients at the medical center, but, at the time of the OIG’s investigation, it remained publicly available for download from app stores.

¹⁵ At the time of his interview in January 2024, the CTO stated that he believed that the wayfinding application had only been downloaded a handful of times.

the medical center in September 2022. Ms. Skala served as deputy director until she retired in April 2024 while the OIG's investigation was ongoing.¹⁶ In this role, Ms. Skala's responsibilities included "mirror[ing] the director and his oversight of the entire organization, whether it is a clinical or an operational function."

Ms. Skala's son worked at the medical center from February 2009 until December 2017 as a program analyst, among other roles. According to his former supervisor, his main responsibility as a program analyst was to work on wayfinding technology projects. When Ms. Skala's son left the Orlando medical center, he became the CTO of the James A. Haley Veterans' Hospital in Tampa, Florida. He left VA in 2021 to take a position with the software developer.¹⁷

¹⁶ OIG investigators interviewed Ms. Skala on January 17, 2024, and she indicated at that time that she planned to retire later in the year. Ms. Skala retired on April 20, 2024.

¹⁷ The conduct of Ms. Skala's son also potentially implicated federal criminal ethics laws. The OIG presented this information to the US Attorney's Office for the Middle District of Florida in March 2024; it declined to open a criminal investigation related to his conduct. Because Ms. Skala's son was no longer a VA employee at the outset of the OIG's investigation and would not be subject to disciplinary action, the scope of this administrative investigation did not include a detailed examination of his conduct.

Findings and Analysis

Finding 1: Ms. Skala Violated Ethics Rules by Using Her Position to Promote Procurement of Software from Her Son's Employer

Ms. Skala violated the federal ethics regulation prohibiting federal employees from using their public office for private gain when she attempted to convince her VISN colleagues on multiple occasions to enter into a VISN-wide contract with the software developer that employed her son. Ms. Skala also violated this prohibition when she directed the medical center CTO, a subordinate employee, to procure the wayfinding application from the software developer for the medical center in 2022 and 2023. Although Ms. Skala's efforts did not result in any contracts, her conduct nonetheless violated ethics rules, as discussed below.

Under the heading "Basic obligation of public service," the Standards of Ethical Conduct for Employees of the Executive Branch state:

*Public service is a public trust. Each employee has a responsibility to the United States Government and its citizens to place loyalty to the Constitution, laws, and ethical principles above private gain.*¹⁸

In addition, ethics rules expressly prohibit employees from using their public office for their "own private gain . . . or for the private gain of friends [or] relatives."¹⁹ An employee does not have to be successful in obtaining the benefit; an attempt to use public office for private gain is sufficient to find a violation of the rule so long as the employee engages in the prohibited conduct with the purpose of obtaining private gain.²⁰ Federal ethics regulations further prohibit an employee from using their "public office in a manner that is intended to coerce or induce another person, including a subordinate, to provide any benefit, financial or otherwise, to himself or to friends [or] relatives"²¹ The OIG found that Ms. Skala's attempts to convince her colleagues in the VISN and her subordinate at the medical center to contract with the software developer were done with the knowledge that it could provide a benefit for her son.²²

¹⁸ 5 C.F.R. § 2635.101(a) (2023). The OIG analysis applies the rules that were in effect at the time of Ms. Skala's conduct. The rules cited in this report were not amended during that time period, which spanned from March 2021 until Ms. Skala's retirement in April 2024. The OIG notes that the ethics rules were amended in May 2024 (effective August 2024), and Ms. Skala's conduct would still be prohibited under these later amendments. *See* Modernization Updates to Standards of Ethical Conduct for Employees of the Executive Branch, 89 Fed. Reg. 43,686, 43,690 (May 17, 2024).

¹⁹ 5 C.F.R. § 2635.702(a) (2023).

²⁰ *Sphatt v. Dep't of Homeland Sec.*, 853 F.App'x 653, 657 (Fed. Cir. 2021).

²¹ 5 C.F.R. § 2635.702(a).

²² Factors that highlight an individual's intent to use their public office for private gain can include knowledge of the circumstances that would result in the gain, as well as actions taken to make the gain more likely. *Sphatt*, 853 F. App'x at 657.

According to Ms. Skala’s son, he stood to benefit from helping to get contracts for the software developer in the form of potential bonus pay. Ms. Skala claimed that she was motivated by her belief, based in part on her own experience as a veteran, that the wayfinding application could help patients navigate the medical center. However, she was also fully aware of her son’s employment bonus structure and had knowledge of her son’s finances because she shared bank accounts with him; they also frequently transferred funds back and forth between their accounts. In fact, Ms. Skala told OIG investigators that she knew her son would receive a percentage of money for any contract that “he’s had a hand in,” and that the amount of the bonus would be a percentage of the contract size. Ms. Skala said she was also aware that her son had received multiple bonuses, including one for \$5,000, and that they had discussed his bonuses a half-dozen times over the course of the two years that he had been employed with the software developer.²³ Further, as described in detail below, Ms. Skala also took a number of actions between 2022 and 2023 that enhanced the likelihood of contracts being awarded to the software developer. These actions included Ms. Skala frequently extolling the application to her colleagues in meetings, including the April 6, 2023, ELB meeting, as well as directing her subordinate to procure the application in 2022 and 2023.

Ms. Skala Encouraged VISN Colleagues to Procure the Application from the Software Developer

In the three months before the April 2023 ELB meeting, Ms. Skala promoted the wayfinding application to her VISN colleagues on at least three occasions without expressly disclosing her son’s involvement with the software developer. The first of these was the January 2023 VISN Strategic Planning Retreat. According to the VISN deputy network director, during a breakout session related to patient engagement, Ms. Skala brought up the wayfinding application and stated, “[w]ell, you know, we’ve got a wayfinding solution that we’re putting in place in Orlando, and it’s great and it’s wonderful.”²⁴ The deputy VISN director further recounted that Ms. Skala “show[ed] some of the people the app on her phone at the table”

As a result of the breakout session, Ms. Skala was invited to present about wayfinding to VISN deputy and associate directors at a February 10, 2023, virtual “best practices” meeting.²⁵ During the virtual meeting, Ms. Skala participated in a presentation about the wayfinding application. The Microsoft Teams record from the meeting showed that Ms. Skala highlighted the wayfinding

²³ In an interview with the OIG, Ms. Skala’s son echoed her statements, saying, “if the contract is awarded, then I get a little something, you know, as far as a bonus goes for that.”

²⁴ According to the VISN deputy network director, this retreat is a time where the leaders in the VISN collectively look at issues to “improve patient and customer satisfaction.”

²⁵ The best practices meeting is a rotating monthly meeting during which each facility spotlights a best practice to the rest of the VISN. According to the VISN deputy director, the February 2023 best practices meeting led her to request that Ms. Skala present to the ELB. As described in a later section, the application was not, in fact, actively used in the facility and no contract was in place.

application's features, claimed that the medical center currently had the application working, and invited members of other VISN facilities to come to Orlando to "see [it] in action."²⁶ This invitation came to fruition in March 2023 when several VISN officials traveled to Orlando to view the application in person. Ms. Skala helped organize and plan that demonstration.

During the ELB meeting on April 6, 2023, the software development company and its partners gave an approximately hour-long presentation about the wayfinding application. Ms. Skala's son, who had a different last name than his mother, also participated in the meeting and answered audience questions. The director of the West Palm Beach VA Medical Center recounted that Ms. Skala raised her hand during the presentation on multiple occasions and made comments like "[y]ou know, this is great. This is what I implemented," as well as, "I brought this to my other health systems that I was in." This individual said Ms. Skala called the wayfinding application "a great product." He further recalled her saying that "she didn't want to influence anybody," as the product would "speak for itself." This individual also felt that the way Ms. Skala characterized the product was concerning. He summarized her comments as "here's a vendor, here's a solution. What do you guys think? We need to do it."

The director of the West Palm Beach VA Medical Center also stated in an interview that immediately before the wayfinding presentation, Ms. Skala approached him and stated, "[y]ou're getting ready to see my son"²⁷ This witness described this interaction as "odd," and that he knew Ms. Skala's son from when he worked at the Orlando facility. Ms. Skala further told this witness that her son "no longer worked for the VA," and that he was now working for a company that "had been asked to come in and talk about wayfinding." In retrospect, this witness thought this interaction "was really strange" and felt that it was an attempt by Ms. Skala to "grease" the situation or gauge his reaction in order to make him "less concerned about what was going to happen." This witness contacted the VISN director shortly after the ELB meeting about his concerns that Ms. Skala's son was present at the meeting.

The VISN director, who was also present at the April 2023 meeting, described Ms. Skala as the "number one advocate for the product" during the presentation and stated that Ms. Skala wanted to move forward with VISN procurement "very fast." The director recalled further that, during the presentation, Ms. Skala "pulled out her iPhone and actually loaded the application and . . . showed a . . . couple things" to the room. Ms. Skala was also "promoting the product pretty heavily" and said things like "no other company has this product."²⁸

²⁶ Ms. Skala's son was invited to this virtual meeting. However, Ms. Skala could not recall if he was present.

²⁷ In an interview with the OIG, Ms. Skala admitted she was aware at the time that her son would likely be present at the upcoming ELB presentation.

²⁸ According to the VISN chief human resources officer, Ms. Skala was considered by her peers to be a "subject matter expert in wayfinding," and she frequently raised the issue during meetings. This individual further recounted that the wayfinding application came up with such frequency from Ms. Skala that people within the VISN referred to it as "Tracy Skala's Wayfinding" and "Tracy Skala's baby."

In addition, Ms. Skala claimed during the ELB meeting that the medical center was actively using the wayfinding application despite the evidence showing that this was not true, including there being no contract in place. She testified that she told the ELB that the application “really works great,” and that “[w]e really love it” in Orlando. Multiple ELB members testified that they were led to believe that, as one witness put it, the medical center was “already in business” with the software developer.

Ms. Skala’s conversations with her VISN colleagues to adopt the wayfinding application continued after the ELB meeting. The next day, April 7, 2023, she contacted the deputy VISN director to discuss the possibility of a VISN-wide procurement effort. During an email exchange, Ms. Skala told the deputy VISN director that the medical center did not yet have a contract for the wayfinding application. She further stated that she would work with the CTO on developing an executive decision memorandum so that the other hospital directors could consider pursuing a VISN-wide contract.²⁹ This exchange occurred on the same day that the VISN director sent an email to Ms. Skala and the other members of the ELB stating that “[e]ffective immediately[,] No VISN 8 employees will engage or take part in any conversation, communication, or information exchange” with the software developer at issue or related entities. As discussed above, Ms. Skala was aware that her son could benefit by receiving a bonus if a contract was awarded, and her interactions with her colleagues as highlighted above made this outcome more likely.

The VISN director informed the OIG team that, following these events, he sought to determine whether there was any VISN-level or national Veterans Health Administration (VHA) policy or procedure that governs vetting conflicts of interest in advance of vendor presentations at ELB meetings. He indicated that he was not able to identify any through outreach to other VISN directors, and that VHA’s Office of Governance, Regulations, Appeals, and Policy confirmed to him that there was no national policy. In August 2024, the VISN director told the OIG team that his staff was working on creating a specific procedure for VISN 8 to address this issue. On October 1, 2024, VISN 8 published a standard operating procedure “to ensure the appropriateness of interactions” between VA and the “vendor community.”³⁰ In particular, this new procedure created a formal approval process for vendors invited to present at ELB meetings, as well as an affirmative obligation by ELB members to consider and report conflicts of interest to ELB leaders in advance of presentations.³¹ The OIG recognizes these positive steps and recommends that VHA develop a broader policy governing vendor presentations at ELB and other VISN leader meetings.

²⁹ An executive decision memorandum is an agreement between facilities within a VISN to proceed with a certain action.

³⁰ VISN 8, “Executive Leadership Board (ELB) Vendor Presentations” (standard operating procedure), October 1, 2024.

³¹ VISN 8, “Executive Leadership Board (ELB) Vendor Presentations.”

Ms. Skala Directed a Subordinate to Procure the Application from the Software Developer

The OIG also found that Ms. Skala improperly influenced the medical center CTO, a subordinate, in an attempt to provide a benefit to her son. Ms. Skala’s interactions with the CTO from 2022 to 2023 show that she directed the CTO to try to procure the software developer’s wayfinding application for the medical center. In her role as deputy director of the medical center, Ms. Skala was one of the most senior leaders at the facility—though she was not in the CTO’s direct supervisory chain.³²

According to the CTO, at some point after Ms. Skala began working at the medical center as the associate director, the CTO gave her “a brief history” of his previous attempts to secure a wayfinding application contract there. In turn, according to the CTO, Ms. Skala responded, “keep working, keep trying to do it . . . try to get the contract through.” In May 2022, the CTO initiated acquisition planning. According to the CTO, the contract was intended to bring the wayfinding application created by the software developer who employed Ms. Skala’s son to the medical center.

Although not in the CTO’s direct supervisory chain, Ms. Skala oversaw the CTO’s acquisition efforts and attempted to convince him to complete the acquisition by the end of May 2022. Over the course of several months in 2022, Ms. Skala inquired about the status of the acquisition at least 12 times in emails and Teams messages. She also asked the CTO about the costs of obtaining the wayfinding application at the medical center as well as the cost of expanding to other facilities in the VISN. The CTO testified that, in his interactions with Ms. Skala, she would ask him things like “where are we at with this contract?” During these exchanges, Ms. Skala and the CTO discussed a demonstration of the wayfinding application for the director of the medical center. As Ms. Skala had a scheduling conflict, she asked the CTO “to pitch for me” and instructed him to cover certain topics.

When the contract was delayed in September 2022 by a medical center information security systems officer (ISSO) who wanted more information on the application’s network security risk before signing off on it, Ms. Skala asked the ISSO for an explanation for the delay.³³ Although the application was eventually cleared, no contract was executed by the end of fiscal year 2022.

³² The CTO indicated that people above him at the medical center included his direct supervisor, the associate director, the assistant director, the deputy director (Ms. Skala), the chief of staff, and the director.

³³ The ISSO’s role is to review acquisition requests for issues concerning network security. In this instance, the ISSO mistakenly believed that the CTO had been involved in the creation of the wayfinding application while employed by the software developer. The ISSO told OIG investigators that he had approached the VA Office of General Counsel about what he perceived to be an ethical conflict, which conducted an investigation and concluded that the CTO had never worked for the software developer. The ISSO then continued the review and ultimately cleared the application.

A few months after the ELB meeting—and the VISN director’s April 7, 2023, email prohibiting further contact with the software developer and its partners—Ms. Skala renewed her efforts to get a contract for the medical center. In an email exchange with the CTO, Ms. Skala inquired about the wayfinding application and asked “[c]an you get this one in Q1 – have been waiting since early last year to have it done.” In an interview with the OIG, the CTO recounted that, around this time, Ms. Skala made a comment to the effect of “forget about the VISN, let’s just take care of Orlando.” The CTO agreed with OIG investigators that this instruction directly contradicted the VISN director’s instructions. The CTO further stated that when he expressed concern to Ms. Skala about this, she told him to “take care of Orlando.” He told OIG investigators that he had moved forward with the 2023 acquisition with a “brand name justification” for the wayfinding application from the software developer solely at the direction of Ms. Skala and that he did not discuss this solicitation with anyone else at the facility. Ultimately, the contracting office canceled the solicitation on February 16, 2024, because the bid received was too expensive. As discussed above, Ms. Skala was aware that her son could benefit by receiving a bonus if a contract was awarded, and her interactions with the CTO made this outcome more likely.

Finding 1 Conclusion

Ms. Skala attempted to persuade her VISN colleagues on multiple occasions between January 2023 and April 2023 to contract with the software development company that employed her son. These efforts culminated in the ELB meeting held on April 6, 2023, in which Ms. Skala’s son was present and participated. Further, Ms. Skala directed a subordinate to procure the wayfinding application in both 2022 and 2023. In all these instances, Ms. Skala was aware that her son could benefit by receiving a bonus if a contract was awarded, and she took a number of actions, as highlighted above, to make that outcome more likely. As a result, the OIG found that Ms. Skala violated the prohibition on using one’s public office for private gain. It is immaterial to the finding whether the product was beneficial to the medical facility or VISN or whether its usefulness was a motivating factor for Ms. Skala’s promotion of the application, as she claimed in her interview with OIG investigators.³⁴ As the next finding indicates, Ms. Skala should have recused herself and not used her position to facilitate a contract that would benefit her son.

³⁴ The ethical prohibitions do not consider whether there was any benefit to the agency as a result of the employee’s misuse of public office (or excuse misconduct on that basis). *See* 2635.702(a).

Finding 2: Ms. Skala’s Participation in Matters Involving Her Son’s Employer Was an Apparent Conflict of Interest

As a general principle, employees shall “endeavor to avoid any actions creating the appearance that they are violating the law or the ethical standards”³⁵ Federal regulations establish standards that government employees must meet to avoid even the *appearance* of partiality in the performance of their official duties.³⁶ This regulation exists to “ensure that an employee takes appropriate steps to avoid an appearance of loss of impartiality in the performance of [their] official duties.”³⁷ The rule provides that

when an employee knows that a particular matter involving specific parties is likely to have a direct and predictable effect on the financial interest of a member of his household, or knows that a person with whom he has a covered relationship is or represents a party to such matter, and where the employee determines that the circumstances would cause a reasonable person with knowledge of the relevant facts to question his impartiality in the matter, the employee should not participate in the matter unless he has informed the agency designee of the appearance problem and received authorization from the agency designee³⁸

The Office of Government Ethics (OGE) has explained that the rule obligates an employee who has personal or business relationships that are “especially likely” to raise issues of lack of impartiality to consider such potential conflicts *in advance* of taking any action involving such parties.³⁹

Ms. Skala had an obligation to consider the appearance of partiality related to her son’s employer and to recuse herself from matters in which her son was involved.⁴⁰ Her relationship with her son constituted a “covered” relationship because he was “a relative with whom the employee has a

³⁵ 5 C.F.R. § 2635.101(b)(14).

³⁶ 5 C.F.R. § 2635.502(a) (2023). 5 C.F.R. § 2635.702(d) further provides, “To ensure that the performance of his official duties does not give rise to an appearance of use of public office for private gain or of giving preferential treatment, an employee whose duties would affect the financial interests of a friend, relative or person with whom he is affiliated in a nongovernmental capacity shall comply with any applicable requirements of § 2635.502.”

³⁷ 5 C.F.R. § 2635.501(a) (2023).

³⁸ 5 C.F.R. § 2635.502(a). Executive branch employees are also prohibited by criminal statute from participating personally and substantially in a particular matter that, to the employee’s knowledge, could directly and predictably affect their own financial interest unless they receive a written waiver or the financial interest is exempt. 18 U.S.C. § 208. OGE Informal Advisory Letter 96 X 10, April 25, 1996 at 2. As stated above, the OIG presented relevant information to the US Attorney’s Office for the Middle District of Florida, which declined to pursue a criminal investigation.

³⁹ OGE Informal Advisory Letter 97 X 8, April 22, 1997.

⁴⁰ 5 C.F.R. § 2635.502(a) & 502(e). These rules in effect at the time of Ms. Skala’s conduct required her to “not participate in”—or, in other words, to *recuse* herself from—any matters involving potential contracts with her son’s employer. 5 C.F.R. § 2635.502(a) & 502(e); see also *Merriam-Webster*, “recuse,” accessed December 12, 2024, <https://www.merriam-webster.com/dictionary/recuse>.

close personal relationship.”⁴¹ In addition, Ms. Skala’s and her son’s finances were intertwined at times, including sharing checking and savings accounts during the time period covered by this investigation. As mentioned above, Ms. Skala was fully aware of her son’s employment bonus structure and had knowledge of her son’s finances. Ms. Skala told OIG investigators that she knew that her son would receive a percentage of money for any contract that “he’s had a hand in,” and that the amount of the bonus would be a percentage of the contract size. As a result, she should have known that any matters involving the software development company that employed her son were likely to have a direct and predictable effect on his financial interest.

Ms. Skala had been alerted by the CTO in 2022 that her relationship with her son could raise questions regarding her impartiality. In one message, the CTO expressed concern to Ms. Skala about involving her son in a presentation of the wayfinding application to the director of the medical center.⁴² After Ms. Skala asked in an email if the CTO planned to invite her son, the CTO responded, “I can . . . invite [him] but was trying to keep this separate for appearance reasons. You tell me if it’s okay to invite [him].” Ms. Skala then replied, “Good point[,] figure they can ask him.” The CTO ultimately did invite Ms. Skala’s son, and VA electronic records reflect that her son attended.

In an interview with the OIG, Ms. Skala stated that she had previously taken VA’s annual ethics training and tried to “relate myself back to the fact that I do have a son that works for a company that does have contracts with VA.”⁴³ Ms. Skala also claimed that, due to her son’s position, she “tr[ie]d actively to stay four, five steps away from anything to do with wayfinding.” She further stated that she sometimes found herself in a difficult position, saying, “I’m trying to provide guidance, but at the same time I’m trying my damndest to stay away from all of it.” Yet, the investigation revealed that, as highlighted above, Ms. Skala was closely involved in the efforts to procure the wayfinding application both for the medical center and for the VISN. Moreover, Ms. Skala acknowledged that she did not consider the potential appearance problem in advance of taking actions involving her son’s employer. For example, Ms. Skala stated that she included her son in emails that she should not have and that she “should have had more foresight and thought about that instead of just letting the emails . . . continue to move forward.” She also conceded that she “never . . . planned on” her son working on anything that she was “engaged in,” and that “it didn’t click” or “come together” for her to “take another step that says, okay, no, I can’t do this . . .” She further stated that she should have consulted with an ethics official

⁴¹ 5 C.F.R. § 2635.502(b)(1)(ii).

⁴² The CTO’s conduct raised concerns about his duty to report misconduct as required by 38 C.F.R. § 1.201 (2003). However, the CTO’s conduct was outside the scope of the OIG’s investigation, and, in consideration of Ms. Skala’s influence over the CTO, the OIG did not make a recommendation related to this conduct. This does not preclude VA from taking further action as deemed appropriate.

⁴³ The software developer does not have any direct contracts with VA but is a subcontractor serving the Las Vegas VA Medical Center, Salt Lake City VA Medical Center, and Salem VA Medical Center in Virginia.

about her son and his work with the software developer and admitted that her actions amounted to an “ethics failure.”

A reasonable person with knowledge of the facts would question Ms. Skala’s impartiality in this matter, as did the VISN director soon after learning that one of the software developer’s presenters at the April 2023 ELB meeting was Ms. Skala’s son. The director of the West Palm Beach VA Medical Center recounted that he was “floored” by the situation and “was shocked that this was taking place.”

Finding 2 Conclusion

The OIG found that Ms. Skala had an apparent conflict of interest arising from her son’s employment with the software developer. Given their shared bank accounts and that she was aware of her son’s eligibility for a bonus based on a new contract, she should have known that any matters involving the software developer that employed her son were likely to have a direct and predictable effect on her son’s financial interest. Additionally, Ms. Skala consistently failed to consider whether her impartiality could reasonably be questioned, contrary to the requirements of the apparent conflict rule. Further, the OIG found that a reasonable person with knowledge of the facts would question Ms. Skala’s impartiality in this matter. As a result, Ms. Skala should have recused herself from all matters related to the software developer but did not do so, in violation of ethics rules.

Additional Issue Identified: VA’s Inadequate Process for Addressing Unfulfilled Service Period by Recipients of Critical Skill Incentive Pay

In August 2023, Ms. Skala was awarded a critical skill incentive (CSI) on the basis of a skill shortage that was equal to 20 percent of her basic pay or \$32,857.⁴⁴ CSIs were authorized under the PACT Act and are contingent on the employee agreeing to a period of employment with VA.⁴⁵ Ms. Skala received her entire CSI as a lump-sum payment on August 27, 2023, after signing a service agreement for August 27, 2023, to August 26, 2024. Approximately four months before completing this service period, Ms. Skala retired from VA.

Near the conclusion of this investigation, the OIG team sought to determine whether Ms. Skala’s retirement had caused VA to initiate recoupment of a prorated share of her CSI. The team interviewed VISN human resources and finance personnel, the medical center’s human resources servicing office staff, and the VHA Retirement Shared Services Office staff. Responses indicated

⁴⁴ Ms. Skala received the CSI as part of a group consisting of all associate medical center directors, deputy medical center directors, and assistant medical center directors.

⁴⁵ Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act, P.L. 117-168, 136 Stat 1759. This law gives the Secretary of VA the authority to pay CSIs to employees who have a high-demand skill or a skill that is at a shortage and whose employment serves a critical need. As a prerequisite, the employee must sign a service agreement, which is a written agreement to complete a specified period of employment with VA. 38 U.S.C. § 706(d)(3).

that there did not appear to be any clear assignment of responsibility to a particular human resources office or position (or an automated workflow) for determining whether a departing employee is subject to a continuing service obligation at the time they are leaving VA. In addition, depending on the circumstances surrounding the departure, the processing of the related employment action can involve the Retirement Shared Services Office, VISN human resources, human resources servicing office, medical center, and finance staff.

With respect to Ms. Skala, evidence indicated that she acted properly but VA failed to initiate recoupment despite Ms. Skala having asked medical center human resources staff in February 2024 how to repay the portion of the CSI that she would owe on her retirement; VISN and finance staff were aware of this request. In addition, when completing the medical center's electronic retirement clearance system checklist in April 2024, Ms. Skala responded affirmatively to a question about whether she had received a retention or recruitment bonus or CSI in the past 12 months.⁴⁶

After the OIG investigative team contacted the VISN chief human resources officer to determine whether a portion of the CSI had been recouped, she followed up with medical center staff. The VISN chief human resources officer confirmed in an interview that the medical center staff had not taken steps to establish the debt prior to the OIG team's outreach but that she did direct them to initiate the process in late September 2024—seven months following Ms. Skala's repayment request and five months after her departure.

Conclusion

The OIG found that Ms. Skala, while employed as the associate director and the deputy director of the Orlando VA Medical Center, used her public office to promote the procurement of a contract on multiple occasions that would have resulted in private gain for her son, which was a violation of government ethics rules. Over several years, Ms. Skala asked VISN colleagues and a subordinate federal employee to award contracts that would benefit her son's employer and, in turn, her son. Further, the OIG found that during her tenure at the medical center, Ms. Skala participated in several meetings and many communications related to her son's employer without recusing herself, despite the appearance of a conflict of interest. Because Ms. Skala retired from VA, the OIG makes no recommendations with respect to disciplinary action regarding her conduct but has made a recommendation related to the creation of a national policy and procedures governing vendor presentations to VISN and facility leaders to address potential conflicts of interest or appearance of partiality concerns. In consideration of the issues surrounding Ms. Skala's CSI, the OIG has made two additional recommendations to help determine whether VA has recouped the portion of Ms. Skala's CSI that is required to be repaid

⁴⁶ An assistant human resources officer at the Orlando VA medical center told OIG investigators that in September or October 2023 she requested this prompt to be added to the electronic checklist so that departing employees would be on notice that they may owe a debt to VA.

and to confirm VA has established the debts and initiated recoupment for any other senior employees (GS-15 or higher) in VHA who received CSIs and departed before completing their required service period.⁴⁷

Recommendations

1. The Veterans Health Administration chief operating officer establishes a written policy or procedure to reasonably ensure that potential conflicts of interest or appearance of partiality concerns involving VHA employees are identified and remediated before contractor presentations to Veterans Integrated Service Network or facility leaders.
2. The Veterans Integrated Service Network 8 director confirms that VA has initiated the process to seek recoupment of the critical skill incentive paid by VA to Ms. Skala that was attributable to a service period that she did not complete due to her retirement.
3. The assistant secretary for Human Resources and Administration/Operations, Security, and Preparedness directs a review to determine whether any VHA employee ranked GS-15 or above awarded a critical skill incentive has left VA before completing their required service obligation, and, if so, whether VA has established a debt and initiated recoupment in the amount of the CSI attributable to the uncompleted period, and takes further corrective actions as warranted.

⁴⁷ The recommendation addressed to the assistant secretary for Human Resources and Administration/Operations, Security, and Preparedness is directed to anyone in an acting status or performing the delegable duties of the position.

VA Comments and OIG Response

The acting under secretary for health, VISN 8 director, and assistant secretary for Human Resources and Administration/Operations, Security, and Preparedness reviewed the draft report. They concurred in principle with the OIG’s first recommendation and concurred with recommendations two and three.⁴⁸ Their full responses are published as appendixes B, C, and D, respectively.

Regarding recommendation 1, VHA proposed an alternative to issuing a new policy or procedure. Specifically, VHA indicated that a memorandum from the chief operating officer that conveyed expectations for VISN and facility leaders while referencing the OIG’s report, existing policy, and mandatory training, would be the most effective action. The written expectations will also communicate “a no-tolerance message with respect to ethics violations and conflicts of interest from entities (contractors or staff) involved in presenting options for acquisitions to VISN or facility leadership.”

The OIG acknowledges that VA provided acceptable action plans and completion timelines in response to the recommendations and will monitor staff’s progress until sufficient documentation has been received to close them as implemented.

⁴⁸ The recommendations in this report are directed to anyone in an acting status or performing the delegable duties of the relevant positions.

Appendix A: Scope and Methodology

Scope

The OIG Office of Special Reviews conducted this administrative investigation from October 2023 through October 2024 to examine allegations concerning possible conflicts of interest related to the efforts of the then deputy director of the Orlando VA Medical Center, Tracy Skala, to convince VA colleagues to procure a software application from her son's employer and its partners. The findings in this report incorporate evidence dating from March 2021 through October 2024.

Methodology

Between October 2023 and October 2024, the OIG interviewed 18 people, including employees of the Orlando VA Medical Center, the West Palm Beach VA Medical Center, Veterans Integrated Service Network (VISN) 8, VHA Procurement & Logistics Office (Network Contracting Office 8), the VHA Retirement Shared Services Office, the VA Office of Information Security, and employees of the software development company and its partners. The OIG also reviewed nearly 5,000 documents, including emails, employment records, Microsoft Teams messages, subpoenaed bank records, and contracting documents, and analyzed applicable laws, regulations, and VA policy.

Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Investigations*.

Appendix B: Acting Undersecretary for Health Comments

Department of Veterans Affairs Memorandum

Date: February 27, 2025

From: Acting Under Secretary for Health (10)

Subj: Office of Inspector General (OIG) Draft Report, Former Orlando Department of Veterans Affairs (VA) Medical Center Executive Violated Ethics Rules (VIEWS 12779167)

To: Assistant Inspector General for Special Reviews (56)

1. Thank you for the opportunity to review the report on a Former Orlando VA Medical Center Executive Violated Ethics Rules. The Veterans Health Administration (VHA) concurs with recommendation one and submits the attached action plan.
2. VHA is committed to the highest standards of ethical conduct in all our operations. We consider ethical leadership to be fundamental to our achievements. This report highlights an opportunity for us to strengthen awareness on this topic and remind leaders of our expectation to disclose potential or actual conflicts of interest.

The OIG removed point of contact information prior to publication.

(Original signed by)

Steven L. Lieberman, M.D., MBA, FACHE

**VETERANS HEALTH ADMINISTRATION (VHA)
Action Plan**

**Former Orlando VA Medical Center Executive Violated Ethics Rules, Project
Number 2023-02157-SR-0008**

Recommendation 1: The Veterans Health Administration Chief Operating Officer establishes a written policy or procedure to reasonably ensure that potential conflicts of interest or appearance of partiality concerns involving VHA employees are identified and remediated before contractor presentations to Veterans Integrated Service Network or facility leaders.

VHA Comments: Concur in Principle. VHA agrees with the intent of this recommendation to ensure VHA's Veterans Integrated Services Network (VISN) and facility leadership are aware of and take action to identify and remediate conflicts of interest before making decisions on acquisitions. However, VHA finds that a memorandum from the Chief Operating Officer conveying expectations for VISN and facility leadership while referencing this Office of Inspector General (OIG) report (post publication), existing policy, and mandatory training, would be the most effective action and would align with high reliability principles. VHA's Chief Operating Officer will coordinate with relevant VHA or Department of Veterans Affairs (VA) offices to ensure written expectations convey a no-tolerance message with respect to ethics violations and conflicts of interest from entities (contractors or staff) involved in presenting options for acquisitions to VISN or facility leadership.

Status: In Progress

Target Completion Date: September 2025

Appendix C: Veterans Integrated Services Network 8 Director Comments

Department of Veterans Affairs Memorandum

Date: February 20, 2025

From: VISN 8 Network Director

Subj: Department of Veterans Affairs (VA) Office of Inspector General (OIG) Special Reviews Report, Former Orlando VA Medical Center Executive Violated Ethics Rules

To: Assistant Inspector General for Special Reviews (56)

Acting Chief Integrity and Compliance Officer (10OIC)

1. Veterans Integrated Services Network (VISN) 8 appreciates the opportunity to work with the Office of Inspector General (OIG) Office of Special Review as we seek to enhance our processes to identify and mitigate potential conflicts of interest in all interactions with vendors. I concur with recommendation two and the attached document contains our action plan.

The OIG removed point of contact information prior to publication.

(Original signed by)

David Isaacks, FACHE

**VETERANS HEALTH ADMINISTRATION (VHA)
Action Plan**

**Former Orlando VA Medical Center Executive Violated Ethics Rules, Project
Number 2023-02157-SR-0008**

Recommendation 2: The Veterans Integrated Service Network 8 director confirms that VA has initiated the process to seek recoupment of the critical skill incentive paid by VA to Ms. Skala that was attributable to a service period that she did not complete due to her retirement.

VHA Comments: Concur. Status: The VISN 8 director confirms that VHA has initiated the process to seek recoupment of the critical skill incentive paid to Ms. Skala.

Status: Completed

Completion Date: October 2024

Appendix D: Assistant Secretary for Human Resources and Administration/Operations, Security, and Preparedness Comments

Department of Veterans Affairs Memorandum

Date: March 18, 2025

From: Assistant Secretary for Human Resources and Administration/Operations, Security and Preparedness (006)

Subj: Response to Draft Report: Former Orlando VA Medical Center Executive Violated Ethics Rules, Project Number 2023-02157-SR-0008

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review and comment on the Office of Inspector General draft report titled “Former Orlando VA Medical Center Executive Violated Ethics Rules, Project Number 2023-02157-SR-0008.” I concur with the recommendation for the Office of Human Resources and Administration / Operations, Security and Preparedness (HRA/OSP) and provide the attached response with a target completion date.

The OIG removed point of contact information prior to publication.

(Original signed by)

Mark R. Engelbaum

**ASSISTANT SECRETARY FOR HUMAN RESOURCES AND
ADMINISTRATION/OPERATIONS, SECURITY, AND PREPAREDNESS (HRA/OSP)
ACTION PLAN**

**Former Orlando VA Medical Center Executive Violated Ethics Rules, Project
Number 2023-02157-SR-0008**

Recommendation 3. The Assistant Secretary for Human Resources Administration/Operations, Security, and Preparedness directs a review to determine whether any VHA employee ranked GS-15 or above awarded a critical skill incentive has left VA before completing their required service obligation, and, if so, whether VA has established a debt and initiated recoupment in the amount of the CSI attributable to the uncompleted period, and takes further corrective actions as warranted.

Comments: Concur. HRA/OSP is coordinating a review with appropriate offices to determine whether any Veterans Health Administration employee ranked GS-15 or above awarded a critical skill incentive has left the Department of Veterans Affairs (VA) before completing their required service obligation, and, if so, whether VA has established a debt and initiated recoupment in the amount of the CSI attributable to the uncompleted period. HRA/OSP will assist VHA with corrective actions, as warranted.

Status: Ongoing

Target Completion Date: September 1, 2025

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