Why OIG Did This Review
Longstanding challenges, including insufficient oversight and limited access to specialists, likely impact the quality of healthcare services provided to American Indians and Alaskan Natives. In certain cases, the Federal government permits Tribes to administer their own healthcare programs through Federally Qualified Health Centers (FQHC), which receive Federal funding but limited Federal oversight in recognition of the independent nation status of the Tribes. In 2017, our office conducted a review of direct-care services provided at the Passamaquoddy Tribe’s Pleasant Point Health Center (PPHC) that identified health and safety issues affecting quality of care. This review extends this work to evaluate the medical-referral process for specialty healthcare provided at facilities external to PPHC.

Our objective was to determine whether the Passamaquoddy Tribe at Pleasant Point met Federal requirements for medical referrals processed at PPHC.

How OIG Did This Review
We reviewed the scope of services identified in the Indian Health Service’s (IHS’s) contracts with the Passamaquoddy Tribe at Pleasant Point, requirements for Medicare FQHC, and Tribal requirements for calendar years 2014 through 2016 and compared services that were required to be provided to actual services rendered at PPHC.

The Passamaquoddy Tribe’s Pleasant Point Health Center Needs To Improve Its Medical-Referral Process

What OIG Found
The Passamaquoddy Tribe at Pleasant Point did not always meet Federal requirements for medical referrals. Specifically, we found that PPHC did not utilize a Managed Care Committee (MCC), comprised of the required medical and administrative staff, to review medical referrals on a weekly basis. In addition, PPHC did not always maintain accurate and complete documentation of medical referrals.

PPHC did not follow IHS policies and procedures to utilize an MCC to review medical referrals on a weekly basis and maintain accurate and complete documentation of medical referrals because the Passamaquoddy Tribe at Pleasant Point’s health director did not provide adequate supervision of the administrative staff and the referral process, and PPHC did not implement safeguards to prevent the loss of referral data. As a result, there was an increased risk that patients did not receive critical health services for time-sensitive medical conditions and clinical providers did not always have accurate or complete medical documentation to assess and prioritize patients’ clinical treatment progress.

What OIG Recommends
We recommend that the Passamaquoddy Tribe at Pleasant Point (1) reestablish an MCC, comprised of the required medical and administrative staff, to review medical referrals on a weekly basis in accordance with Federal requirements and (2) implement policies and procedures to maintain complete and accurate documentation of medical referrals.

The Passamaquoddy Tribe at Pleasant Point concurred with our recommendations and described actions it has taken or planned to take to address them. For example, PPHC has reestablished the MCC, comprised of medical and administrative professionals, to meet and review referrals on a weekly basis to ensure that medical referrals are processed in a timely manner.

The full report can be found at https://oig.hhs.gov/oas/reports/region1/11701503.asp.