

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



# Veterans Benefits Administration

*Review of  
Alleged Data Manipulation  
of Appealed Claims at  
VA Regional Office  
Wichita, Kansas*

April 26, 2016  
15-03581-204

# ACRONYMS

DC	Diagnostic Code
IPC	Intake Processing Center
NOD	Notice of Disagreement
OIG	Office of Inspector General
VA	Department of Veterans Affairs
VACOLS	Veterans Appeals Control and Locator System
VARO	VA Regional Office
VBA	Veterans Benefits Administration
VBMS	Veterans Benefits Management System
VSC	Veterans Service Center

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# Highlights: Review of Alleged Data Manipulation of Appealed Claims at VA Regional Office Wichita, Kansas

## Why We Did This Review

In April 2015, the Office of Inspector General (OIG) received an allegation that Wichita VA Regional Office (VARO) management instructed staff to input inaccurate data when entering Notices of Disagreement (NOD) into the Veterans Appeals Control and Locator System (VACOLS). Allegedly, VARO staff entered inaccurate data to improve timeliness measures associated with appealed claims processing actions.

## What We Found

The Veterans Benefits Administration (VBA) uses VACOLS, an electronic records system, to track and manage its appeals workloads. The effectiveness of tracking appeals is dependent upon the accuracy and timeliness of the information entered in VACOLS.

We substantiated the allegation that VARO management instructed staff to enter inaccurate data when recording NOD information into VACOLS rather than entering the actual diagnostic code for the disability or disabilities being appealed, as required. We found that in all 36 appealed claims, staff did not follow VBA policy when entering the NODs in VACOLS. We could not determine whether VARO management took these actions to improve timeliness measures.

Data integrity issues identified at the Wichita VARO occurred because of the lack of management oversight and the subsequent conflicting guidance provided by Compensation Service that required VARO staff to enter incomplete and/or inaccurate

information in VACOLS. As a result, VARO staff did not always update VACOLS with accurate information.

This may have resulted in veterans not having received the correct information regarding their claims. In addition, inaccurate claims information in VBA's system of records would result in unreliable appeals workload reporting, as well as an inefficient research and inaccurate responses to inquiries.

## What We Recommended

We recommended the Wichita VARO Director take action to correct the 36 NODs established in VACOLS and implement a plan to provide adequate oversight to ensure staff establish NODs using accurate data. We recommended the Under Secretary for Benefits develop a plan to notify staff at its 56 VAROs of the modified policy, effective July 29, 2015, to ensure correct processing of an appellate claim.

## Management Comments

The Under Secretary for Benefits and VARO Director concurred with our findings and the corrective actions were responsive to the recommendations. We considered Recommendation 1 closed and will follow up as required on the remaining recommendations.

Handwritten signature of Gary K. Abe in blue ink.

**GARY K. ABE**  
Acting Assistant Inspector General  
for Audits and Evaluations

# TABLE OF CONTENTS

Introduction.....	1
Results and Recommendations .....	2
Allegation    VA Regional Office Management Instructed Staff To Enter Inaccurate Data in the Veterans Appeals Control and Locator System to Improve Timeliness Measures.....	2
Recommendations.....	7
Appendix A    Management Comments – Under Secretary for Benefits .....	9
Appendix B    Management Comments - Director of VARO Wichita, KS .....	11
Appendix C    OIG Contact and Staff Acknowledgments .....	13
Appendix D    Report Distribution .....	14

## INTRODUCTION

### **Objective**

In April 2015, we received an allegation of data manipulation at the Wichita VA Regional Office (VARO). The data manipulation involved appealed claims processing actions. Specifically, our objective was to determine whether management instructed staff to input inaccurate data when entering Notices of Disagreement (NOD) into the Veterans Appeals Control and Locator System (VACOLS). In addition, to identify whether VARO staff entered inaccurate data to improve timeliness measures associated with appealed claims processing actions.

### **Background and Criteria**

An NOD is a written communication from a claimant expressing dissatisfaction or disagreement with a benefits decision and a desire to contest the decision. An NOD is the first step in the appeals process. Upon receipt of an NOD, Veterans Benefits Administration (VBA) policy requires that VARO staff review the NOD, establish an electronic record and diary action within 7 days, then enter all appealed issues in the electronic record to include diagnostic codes associated with appealed medical conditions, and finally, send the appellant the appropriate development letter.

VACOLS is the electronic records system that allows VARO staff to control and track veterans' appeals and manage the appeals workload. The effectiveness of tracking appeals in VACOLS is dependent upon the accuracy and timeliness of the information entered.

In July 2014, Compensation Service published a bulletin assigning responsibility for controlling incoming claims, evidence, and NODs, to Intake Processing Center (IPC) staff. The guidance established to control NODs required VARO staff to take these actions:

- Establish the record for the appealed claim in VACOLS
- Establish a diary in the VACOLS using the diary indicator, "NOD Received" and accept the 30-day default diary date, or due date, in VACOLS
- Establish an electronic work control, referred to as an end product (EP), in this case, an EP 170, in another VBA electronic records system
- Establish a 30-day suspense date for the EP 170 and indicate the claim is "Pending Initial Development"

The guidance also indicated that IPC staff were not expected to create a complete VACOLS record when entering NODs, but rather a "placeholder" record with the correct date of receipt of the NOD. Furthermore, by using the NOD Received diary, Appeals Team staff would be prompted to "rapidly review" the NODs and take appropriate actions based on established workload management procedures.

## RESULTS AND RECOMMENDATIONS

### **Allegation**      **VA Regional Office Management Instructed Staff To Enter Inaccurate Data in the Veterans Appeals Control and Locator System to Improve Timeliness Measures**

We substantiated the allegation that VARO management instructed staff to enter inaccurate data when recording NODs in VACOLS—VBA’s electronic records system for appealed claims. We were unable to determine whether VARO management took these actions to improve timeliness measures.

Allegedly, staff used a specific diagnostic code (DC), DC 5000, unrelated to the disability or disabilities involved in the appealed claims. In VA, diagnostic code numbers are arbitrary numbers used for the purpose of showing the basis of the evaluation assigned, as well as for statistical analysis, and which extend from 5000 to a possible 9999. DC 5000 represents osteomyelitis, a medical condition relating to inflammation and infection of bone marrow.

#### ***What We Did***

We arrived at the Wichita VARO on June 16, 2015, for an unannounced review to assess the merits of an allegation that VARO management instructed staff to enter inaccurate data in VACOLS to improve timeliness measures. We interviewed VARO management and staff responsible for managing and processing appealed claims. We reviewed VBA’s appealed claims processing policies, as well as the VARO’s workload management plan. Using VACOLS, we identified 36 appealed claims, pending as of April 28, 2015, that had NODs established using DC 5000, to determine whether staff established these records using inaccurate data.

#### ***What We Found***

VARO staff did not follow VBA policy when entering 36 NODs in VACOLS. Specifically, staff did not accurately enter the correct medical conditions that the veterans were appealing. For all 36 cases, VARO staff used DC 5000—the code used for osteomyelitis. However, none of the veterans with the 36 appealed claims had osteomyelitis.

In addition, 28 of the 36 cases did not comply with VBA policy for processing appealed claims. The types of errors we identified were related to development actions; date entries; and NOD and diary establishment, which have the potential to affect the timeliness of claims processing actions. Some of the cases reviewed contained multiple errors, so the total of the inaccuracies identified exceeded the 28 cases we reviewed.

For the 28 cases we reviewed, we identified inaccuracies in these areas:

### **Development Actions**

- In all 28 cases, VARO staff did not initiate development actions at the time the appealed claims were entered in VACOLS—on average, the development actions on these cases were delayed by approximately 242 days.

### **Date Entries**

- In 13 of the 28 cases, VARO staff did not enter the correct dates contained on the veterans' decision notification letters. The dates entered in VACOLS differed on average by 204 days from the actual dates on the decision notification letters. VBA policy requires VARO staff to notify veterans of claims decisions and their appellate rights. Veterans dissatisfied with their decisions generally have 1 year from the date on the decision notification letters to appeal decisions. Inaccurate data in this field could result in erroneous determinations related to veterans meeting required appeals timelines.
- In 5 of the 28 cases, VARO staff did not enter in the VACOLS record the correct date of receipt. The difference between the dates the NODs were received at VA facilities versus the incorrect dates entered in VACOLS averaged approximately 76 days.

### **NOD and Diary Establishment**

- In 24 of the 28 cases, VARO staff did not establish NODs in VACOLS within 7 days, as required by VBA policy. On average, VARO staff took approximately 45 days beyond the 7-day standard to enter the NODs into VACOLS.
- In 25 of the 28 cases, VARO staff did not enter required diaries in VACOLS within the 7-day standard. On average, it took VARO staff approximately 74 days to enter the VACOLS diaries in the electronic record.
- In 12 of the 28 cases, VARO staff either did not establish a diary or use the correct diary indicator, NOD Received, in VACOLS. VBA policy requires VARO staff to enter accurate diaries in VACOLS. Diaries or due dates are used to track pending action on appeals. Staff must create a diary anytime action on the appeal is pending a response from the appellate or other source. Without diary dates, VBA cannot effectively and efficiently manage its appeals workload.

For the remaining 8 of the total 36 cases, VARO staff erroneously established VACOLS records. For various reasons, these eight cases did not constitute NODs and, as such, VARO staff should not have established VACOLS

records. Examples included NODs submitted outside the allowable period—generally 1 year from the decision notification letter; or evidentiary type documents that simply needed to be associated with appealed claims that already had a VACOLS record established. We gave VARO management for its review the 36 cases we determined contained processing errors.

**Why This Happened**

We attributed the data integrity issues identified at the Wichita VARO to lack of management oversight and the subsequent ambiguous and conflicting guidance provided by VBA's Compensation Service, which required VARO staff to enter incomplete and/or inaccurate information in VACOLS. Because VARO staff did not always enter accurate information in VACOLS, veterans may not have always received the correct information regarding their appealed claims. Moreover, inaccurate claims information in VBA's system of records could have resulted in inefficient use of resources that would be required to research and respond to inquiries and unreliable appeals workload information.

In July 2014, the Wichita VARO transitioned its mail processing functions to be in line with VBA's Centralized Mail initiative. During the transition period, the Veterans Service Center (VSC) Manager stated that one employee was assigned to process mail for appealed claims and that the employee was unable to process all of the mail daily. To resolve the backlog of mail, the VSC Manager instructed the claims processor to enter NODs using the first diagnostic code (DC 5000) from a series of diagnostic codes available in VACOLS to populate the VACOLS records. However, due to the continued backlog of NODs requiring processing, VSC management began using the guidance provided in a July 2014 *Compensation Service Bulletin* that designated IPC staff as responsible for establishing NODs in VACOLS.

According to VARO management and staff, IPC claims assistants received training on how to recognize and establish NODs in VACOLS, in September 2014. However, during the training, it was determined that recognizing and establishing NODs in VACOLS was beyond the capabilities of the claims assistant position. Reportedly, the claims assistants were instructed to enter NODs in VACOLS using DC 5000 as a placeholder, which would be corrected later. However, VARO management could not recall who issued this guidance.

The VSC Manager indicated IPC claims assistants were instructed to accurately enter NODs in VACOLS, using the medical disabilities related to the appealed claims. The VSC Manager stated the continued use of DC 5000 as a placeholder in VACOLS records may have been a misunderstanding from the previous instructions she provided to one claims processor working on the Appeals Team, but noted that these instructions were given prior to the September 2014 training.

*Ambiguous and  
Conflicting  
Guidance*

In July 2015, we interviewed officials from VBA's Compensation Service, responsible for issuing NOD guidance in the July 2014 bulletin. The bulletin indicated that IPC staff were not expected to create a complete VACOLS record when entering NODs, but rather a placeholder record. However, existing policy requires that VARO staff accurately and timely update VACOLS records at every stage of the appeal process. In addition, the bulletin did not explain what placeholder meant. Furthermore, the bulletin directed IPC staff to use the diary "NOD Received," and indicated Appeals Team staff would be prompted to "rapidly review" the NODs and take appropriate action based on established workload management procedures. However, the bulletin did not provide guidance on the meaning of "rapid review." Despite the conflicting policy, VARO staff did not contact Compensation Service for clarification.

Compensation Service Procedures staff stated bulletins were used to establish procedures and provide guidance to VAROs. The officials we interviewed stated that when a bulletin contradicted VBA policy, the policy would supersede the bulletin guidance; they further indicated that Compensation Service should be notified so the conflict could be resolved.

Compensation Service officials indicated the July 2014 bulletin covered the minimum requirements for IPC staff to input placeholders in VACOLS. Reportedly, the guidance was a collaborative effort between Compensation Service Procedures staff and other business lines, to include the Office of Field Operations and Office of Business Process Integration. Purportedly, the guidance was needed to prioritize establishing VACOLS records for NODs, even if it meant using a placeholder with inaccurate information. Management officials agreed there was no clear definition of what VBA intended as a placeholder nor did it provide a timeliness measure in which staff would be expected to correct records containing placeholders. Compensation Service officials also acknowledged that using a placeholder could result in inconsistencies and data integrity issues at its 56 VAROs. The officials also stated that if placeholders were not used, there would be an adverse NOD timeliness issue.

In addition, Compensation Service officials told us that using IPC staff to enter new NODs was a guideline and that they expected VARO managers to use their staff in the most efficient manner to enter appealed claims in VACOLS and as expeditiously as possible. However, the officials also agreed that these expectations were not communicated to the 56 VAROs. Furthermore, Compensation Service officials stated the risk of not controlling NODs in VACOLS is greater for VBA than the risk of entering incomplete or inaccurate data.

*VBA Updated  
Policy*

On August 6, 2015, VBA updated the Compensation Service Calendar with its modified policy for establishing and tracking an NOD in VACOLS and the Veterans Benefits Management System (VBMS). According to the

published notice, which contained a retroactive effective date of July 29, 2015, the modified policy no longer required staff to use placeholders and clearly outlined the correct establishment of an NOD that included listing all disabilities claimed. We had no assurance that staff at VBA's 56 VAROs were aware of this change in policy.

**Potential Risks**

Claims records omitted from VBA's system of records or containing inaccurate information can affect data integrity, as well as impede VBA's ability to manage this workload efficiently. For example, NODs that have not been recorded in VACOLS are not included in VBA's inventory of appealed claims and misrepresent the number of appealed claims pending. Similarly, incorrect data entered in VBA's system of records, such as incorrect dates, mispresent the time it takes VARO staff to process claims. In addition to the data integrity issues, VARO staff reported and we agreed, that other risks associated with following the faulty guidance included:

- Accurate and timely entries in VACOLS are necessary to ensure veterans receive accurate information from VBA's National Call Centers when inquiring about appealed claims.
- Inaccurate information in VACOLS has the potential to affect staff workload. Rating Veterans Service Representatives indicated they were unaware VACOLS records contained inaccurate information—making it possible to complete rating decisions outside their jurisdiction on appealed claims, as well as provide erroneous appellant rights for those claims. Decision Review Officers stated inaccurate information in VACOLS affected their ability to manage their workload. VARO staff also indicated it is time-consuming to correct inaccurate VACOLS records.

**Effect on  
Performance  
Measures**

In September 2014, during the period in which the OIG determined manipulation occurred, the Wichita VARO was not meeting VBA's 7-day performance targets for entering NODs in VACOLS. VBA measures the 7-day period beginning from the date the NOD is received by VA until the date the NOD is entered in VACOLS. When establishing placeholders in VACOLS, the timeliness measurement for this performance target stops. This piecemeal approach misrepresents the actual time it takes VARO staff to enter NODs in VACOLS and can make the control time appear better than actual performance. This 7-day performance goal is a metric tracked on the Directors performance targets at each VARO.

As of April 2015, VBA reported the Wichita VARO had 1,098 NODs pending in its inventory—representing less than 1 percent of the nation's 200,334 pending NODs. Although the available data indicated appealed claims at the Wichita VARO represented a small percentage of VBA's NOD workload, we were concerned the use of placeholders with inaccurate

information was occurring throughout VBA's 56 VAROs and thus compounding the risks associated with this practice.

### **Conclusion**

Based on our examination of a total 36 pending NODs in VACOLS established with a DC 5000 and interviews conducted, we substantiated the allegation that Wichita VARO management instructed staff to enter inaccurate appeals data into VACOLS. We attributed the data integrity issues identified to lack of management oversight and the subsequent ambiguous and conflicting guidance provided by VBA's Compensation Service that required VARO staff to enter incomplete and/or inaccurate information in VACOLS. Based on interviews and our review of VBA policy, we determined that the guidance provided in the July 2014 *Compensation Service Bulletin* was flawed. These actions led to the misrepresentation of the VARO's NOD timeliness measure, while also impairing the VARO's ability to track and measure its workload. Furthermore, some veterans may have received inaccurate information on their appealed claims.

### **Recommendations**

1. We recommended the Wichita VA Regional Office Director ensure staff correct the 36 Notices of Disagreement established in the Veterans Appeals Control and Locator System using inaccurate data.
2. We recommended the Wichita VA Regional Office Director develop and implement a plan to provide adequate oversight to ensure staff establish Notices of Disagreement in the Veterans Appeals Control and Locator System using accurate data.
3. We recommended the Acting Under Secretary for Benefits develop a plan to notify staff at its 56 VA Regional Offices of the modified policy, effective July 29, 2015, to ensure correct processing of appellate claims.

### **Management Comments**

The Director concurred with our findings and recommendations. The Director provided evidence that VARO staff reviewed the 36 NODs to ensure the appealed claims were established in VACOLS using accurate information.

In addition, the Director reported VARO staff sampled the accuracy of 75 of the 762 NODs established in VACOLS from June 2015 through January 2016, and found 4 of the NODs contained errors. The Director further required the Appeals Team supervisor to conduct continued monthly oversight by selecting 10 percent or 20 NODs (the greater of the two) for the next 24 months to ensure compliance. The target for creation and implementation for this planned action was April 1, 2016.

The Acting Under Secretary for Benefits (USB) concurred with our recommendation to develop a plan to notify staff at its 56 VAROs that VBA had modified its policy relating to NODs on July 29, 2015. The Acting USB then reported that VBA would review the modified guidance to assess whether further clarification was needed—stating, it would discuss revisions during calls to field leadership. The target completion is April 30, 2016.

**OIG Response**

The Acting Under Secretary for Benefits and the VARO Director's comments and actions are responsive to the recommendations. We considered Recommendation 1 closed and will follow up as required on the remaining recommendations.

**Data Reliability**

We used computer-processed data from VACOLS. To test for reliability, we reviewed the data to determine whether any data were missing from key fields, included any calculation errors, or were outside the time frame requested. We also assessed whether the data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Furthermore, we compared veterans' names, file numbers, Social Security numbers, VARO numbers, and dates of NODs, as provided in the data received with information contained in the 36 pending appealed claims with a single issue of DC 5000 we reviewed.

Our testing of the data disclosed that they were sufficiently reliable for our objectives. Our comparison of the data with information contained in the veterans' appealed claims reviewed in conjunction with the Hotline objectives of the VARO did not disclose any obvious problems with data reliability.

**Government Standards**

We conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

## Appendix A Management Comments – Under Secretary for Benefits

### Department of Veterans Affairs

### Memorandum

**Date:** March 10, 2016  
**From:** Acting Under Secretary for Benefits (20)  
**Subj:** OIG Draft Report—Review of Alleged Data Manipulation of Appealed Claims VA Regional Office Wichita, Kansas—VAIQ 7675190  
**To:** Assistant Inspector General for Audits and Evaluations (52)

1. Attached is VBA's response to recommendation 3 in the OIG draft report: Review of Alleged Data Manipulation of Appealed Claims VA Regional Office Wichita, Kansas.
2. Questions may be referred to Christine Ras, Program Analyst, at 461-9057.

*(original signed by:)*

DANNY G.I. PUMMILL

Attachment

**Attachment**

**Veterans Benefits Administration (VBA)**

**Comments on OIG Draft Report**

**Review of Alleged Data Manipulation of Appealed Claims VA Regional Office Wichita, Kansas**

**VBA concurs with OIG's findings in the draft report and provides the following comment in response to the recommendation:**

Recommendation 3: We recommended the Acting Under Secretary for Benefits develop a plan to notify staff at its 56 VA Regional Offices of the modified policy, effective July 29, 2015, to ensure correct processing of appellate claims.

VBA Response: Concur. VBA is reviewing the modified guidance to assess whether further clarification is needed. Once finalized, the revisions will be discussed during established calls to field leadership.

Target Completion Date: April 30, 2016

## Appendix B Management Comments - Director of VARO Wichita, KS

### Department of Veterans Affairs

### Memorandum

**Date:** March 10, 2016  
**From:** Wichita VA Regional Office  
**Subj:** OIG Draft Report—Review of Alleged Data Manipulation of Appealed Claims VA Regional Office Wichita, Kansas  
**To:** Assistant Inspector General for Audits and Evaluations (52)

1. Attached is the Wichita Regional Office's response to recommendations 1 and 2 in the OIG draft report: Review of Alleged Data Manipulation of Appealed Claims VA Regional Office Wichita, Kansas
2. Questions may be referred to Barbara Alley, Acting VSCM, at (316) 688-6737.

*(original signed by:)*

Karen A. Townsend

Attachment

**Wichita VA Regional Office's (VARO)**

**Comments on OIG Draft Report**

**Review of Alleged Data Manipulation of Appealed Claims VA Regional Office Wichita, Kansas**

**The Wichita VARO concurs with OIG's findings in the draft report and provides the following comment in response to the recommendation:**

1. Recommendation 1: We recommended the Wichita VA Regional Office Director ensure staff correct the 36 Notices of Disagreement established in the Veterans Appeals Control and Locator System using inaccurate data.

Wichita VARO Response: The Wichita Regional Office concurs with the findings and recommendations.

The Wichita RO has reviewed all 36 Notice of Disagreement (NODs) appeals established to ensure the VACOLS records were updated to reflect the correct notification letter date, NOD date, and correct issue(s) identified. Of the 36 records, four VACOLS records were not updated prior to the appeals being closed due to failure to return the VA Form 9. Changes cannot be made to these VACOLS records due to being in a historical status. However, the dates and issues were correctly identified in the Statement of the Case (SOC) sent to the appellant. In addition, the Wichita RO was unable to find VACOLS records for four appeal cases. There were also six records containing multiple appeals in which the Wichita RO was unable to identify the specific appeal the report was addressing. However, all appeals for each appellant were reviewed and determined to show appropriate diagnostic codes, notification letter dates, and NOD dates. A list of the 36 cases reviewed is attached for verification. The RO requests closure of this recommendation based on the information provided.

2. Recommendation 2: We recommended the Wichita VA Regional Office Director develop and implement a plan to provide adequate oversight to ensure staff establish Notices of Disagreement in the Veterans Appeals Control and Locator System using accurate data.

The Wichita Regional Office concurs with the findings and recommendations.

The Wichita RO ran an Appeals Tableau reports for the period June 2015 through January 2016 and found a total of 762 NODs established during this period. A random review was conducted of 10 percent of the NODs established (a total of 75 cases) to ensure the correct diagnostic codes were listed as well as the correct notification letter date and NOD date was listed in VACOLS. Of the 75 cases reviewed, errors were identified in four cases (5 percent of the cases reviewed). These four errors consisted of one appeal with a missed issue listed on the NOD, two NOD dates recorded incorrectly (using the scan date instead of the date stamp), and one with the incorrect notification letter date. There were no errors found with the diagnostic codes listed. A spreadsheet of the NODs reviewed is attached for verification. Continued oversight will be provided by the Appeals Team Coach performing a monthly review of 10 percent or 20 cases, whichever is greater, of the NODs established each month for the next 24 months. This process is being documented in a Standard Operating Procedure (SOP), which will be created and implemented by April 1, 2016. The RO requests closure of this recommendation based on the information provided.

## Appendix C **OIG Contact and Staff Acknowledgments**

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OIG Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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Acknowledgments	Nora Stokes, Director Kelly Crawford Kyle Flannery Lisa Van Haeren
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