

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



# Veterans Benefits Administration

*Review of  
the Special Initiative  
To Process Rating Claims  
Pending Over 2 Years*

July 14, 2014  
13-03699-209

## ACRONYMS AND ABBREVIATIONS

FY	Fiscal Year
OIG	Office of Inspector General
RVSR	Rating Veterans Service Representative
STR	Service Treatment Record
VA	Veterans Affairs
VARO	VA Regional Office
VBA	Veterans Benefits Administration

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# Report Highlights: Review of VBA's Special Initiative To Process Rating Claims Pending Over 2 Years

## Why We Did This Review

On April 19, 2013, the Veterans Benefits Administration (VBA) began a Special Initiative to process all claims pending over 2 years. VA Regional Office (VARO) staff were to issue provisional ratings for cases awaiting required evidence and complete these older claims within 60 days. Our review focused on whether (1) provisional ratings resulted in veterans receiving benefits more quickly and helped eliminate the backlog, and (2) older claims were accurately processed under the Special Initiative.

## What We Found

The Special Initiative rating process was less effective than VBA's existing rating process in providing benefits to veterans quickly. Further, VBA removed all provisional claims from its pending inventory, despite more work being needed to complete them. This process misrepresented VBA's actual workload of pending claims and its progress toward eliminating the overall claims backlog.

At the end of June 2013 following completion of the Special Initiative, VBA reported 516,922 rating claims pending in its backlog, but only 1,258 rating claims pending over 2 years. We estimated 7,823 provisionally-rated claims had been removed from the inventory though they still awaited final decisions. These claims represented less than 2 percent of VBA's reported backlog, but about 12 percent of claims completed under the Initiative.

VAROs did not prioritize finalization of the provisionally-rated claims once they were

issued. We estimated 6,860 provisional ratings were still waiting for final decisions as of January 2014, 6 months after the Initiative had ended. Because VBA did not ensure existing controls were functioning as needed to effectively identify and manage provisionally-rated claims, some veterans may never have received final rating decisions if not for our review.

Additionally, VBA did not accurately process 77 (32 percent) of 240 rating decisions we reviewed under this Initiative. Generally, these errors occurred because VAROs felt pressured to complete these claims within VBA's 60-day deadline. We estimated VARO staff inaccurately processed 17,600 of 56,500 claims, resulting in \$40.4 million in improper payments during the Initiative period.

## What We Recommend

We recommended the Under Secretary for Benefits establish controls for all provisionally-rated claims, reflect these claims in VBA's pending workload statistics, expedite finalization of provisional ratings, and review for accuracy all claims that received provisional ratings under the Special Initiative.

## Agency Comments

The Under Secretary for Benefits concurred with our recommendations. Management's planned actions are responsive and we will follow up as required on all actions.

Handwritten signature of Linda A. Halliday in black ink.

LINDA A. HALLIDAY  
Assistant Inspector General  
for Audits and Evaluations

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## INTRODUCTION

### **Objective**

This review focused on whether the Veterans Benefits Administration's (VBA) policy for completing provisional ratings was effective in meeting the goals of providing veterans' compensation benefits more quickly and helping to eliminate VBA's claims processing backlog. We also assessed whether VBA followed policy and ensured accuracy under its Special Initiative to Process Rating Claims Pending Over 2 Years (Special Initiative).

### **VBA's Special Initiative**

At the end of March 2013, VBA reported nearly 43,000 rating claims were pending more than 2 years. On April 19, 2013, VBA began its Special Initiative to prioritize and complete all claims received on or before July 1, 2011, within 60 days. VBA instructed VA Regional Office (VARO) staff to produce two categories of rating decisions—final ratings and provisional ratings. VAROs were to issue final ratings with appeal rights for ready-to-rate claims and for cases where they assigned the highest evaluation in the VA Schedule for Rating Disabilities for each claimed disability.

VBA directed VARO staff to issue provisional ratings for cases awaiting certain evidence, such as private treatment records. However, staff could not issue provisional ratings if there were outstanding requests for certain evidence, such as VA medical examinations and service treatment records (STRs). Staff were to process claims based on available evidence, as long as they notified veterans of the information necessary to support their claims. No appeal rights were given for provisional decisions. Final decisions provided for appeal rights 1 year after notice of provisional decisions, upon requests from veterans, or sooner if all evidence was received during the 1-year period after the provisional decision.

VBA expected this Special Initiative would clear the inventory of the oldest pending claims and help reduce the overall backlog of claims pending over 125 days, which VBA reported was approximately 588,000 claims as of the end of March 2013. VBA also expected provisional ratings would allow veterans to receive compensation benefits more quickly.

### **Scope of Review**

We reviewed a statistical sample of 240 claims processed under the Special Initiative from April 19, 2013, through June 19, 2013, comprising 205 final ratings and 35 provisional ratings. Thirty claims were completed at each of the following VAROs: Cleveland, OH; Columbia, SC; Houston, TX; Huntington, WV; Lincoln, NE; Los Angeles, CA; New York, NY; and Waco, TX.

### **Other Information**

- Appendix A provides pertinent background information.
- Appendix B provides details on our scope and methodology.
- Appendix C provides a comparison of intermediate and provisional rating processes.

## RESULTS AND RECOMMENDATIONS

### Finding 1 **Provisional Ratings Were Not Fully Effective in Meeting Special Initiative Goals**

Provisional ratings were not fully effective in meeting goals of the Special Initiative. In comparison with VBA's existing intermediate rating process, provisional ratings provided some claims decisions more quickly; however, they did not allow veterans' compensation benefits to be granted more quickly. Appeal rights for provisional ratings were also delayed until claims finalization. Further, VBA removed provisionally-rated claims from the pending inventory although additional work was needed to finalize these claims. This process ultimately misrepresented VBA's actual workload of pending claims and the progress toward eliminating the overall claims backlog. Appendix C provides a comparison of the intermediate and provisional claims rating processes.

This occurred because VBA did not adequately focus on expediting benefits delivery and ensuring finalization of provisional ratings under the Special Initiative. The provisional ratings policy provided decisions to veterans faster; however, it did not promote quicker delivery of benefits to aid veterans. Further, removing provisionally-rated claims from the pending inventory was inappropriate since work on these claims was not complete. VAROs also did not place a priority on finalizing provisional claims once they were no longer considered part of the backlog. We estimated 6,860 veterans who received provisional ratings were still waiting for final decisions as of January 2014, 6 months after the Special Initiative had ended. Further, because VBA did not ensure existing controls were functioning as intended to effectively identify and manage provisionally-rated claims, some veterans may never have received final decisions if not for our review.

***Some  
Decisions  
Provided More  
Quickly, But  
Not Benefits***

The provisional rating process was less effective than VBA's existing intermediate rating procedure in providing benefits to veterans quickly. On May 22, 2013, the Under Secretary for Benefits stated in testimony before the House Committee on Veterans' Affairs that provisional ratings allowed many veterans who had waited the longest to begin collecting compensation benefits more quickly. However, we determined that in comparison with VBA's existing intermediate rating process, provisional ratings allowed claims to be denied more quickly, but benefits could not be granted more quickly. Appeal rights for provisional ratings were also delayed until claims finalization.

VARO staff used intermediate ratings to grant any benefit and defer a decision on any issue requiring additional evidence until that evidence is received. This procedure ensures veterans receive benefits at the earliest

possible date. Under the Special Initiative, however, VBA prohibited staff from issuing intermediate ratings. Staff also could not defer any issues, which would have kept these provisional claims pending in VBA's backlog. The provisional rating process required that staff decide all issues and close the claims.

*Claims Denied  
More Quickly*

In comparison with the existing intermediate rating process, provisional ratings provided decisions more quickly in cases where all issues in the claims were denied. We found that in 20 of 35 provisional ratings, VARO staff denied all issues claimed by the veterans without waiting for supporting evidence. In fact, the use of provisional ratings allowed staff to deny these veterans' claims and remove them from the backlog prior to obtaining the required evidence. If intermediate rating procedures had been used, these claims would have remained pending in the backlog until staff obtained the evidence required to make final decisions.

*Benefits Not  
Granted More  
Quickly*

Provisional ratings did not allow staff to grant any benefits more quickly. Among the remaining 15 provisional ratings, VARO staff granted one or more of each veteran's claimed issues, resulting in some entitlements to benefits such as service connection or increased compensation. Use of the existing intermediate rating process in these cases would have provided the same benefits to veterans.

In some cases, intermediate ratings could have granted veterans' benefits sooner than provisional ratings. Using the intermediate rating procedure, staff could have provided decisions and granted entitlement to some benefits immediately in situations where staff were waiting for evidence to substantiate other issues in the claim. However, under the Special Initiative, VARO staff were prohibited from granting any benefits on a claim while there were pending requests for evidence to complete the claim, such as VA medical examinations and STRs.

*Appeal Rights  
Delayed*

Provisional ratings delayed veterans' appeal rights while they waited for final decisions. According to established VBA policy, a veteran has 1 year from the date VA mails a notice of a claim decision to file an appeal. Upon receipt of an appeal, VARO staff can review its merits and grant additional benefits, if warranted, without regard to the original decision. In the case of an intermediate rating, a veteran is entitled to appeal some decisions while VARO staff defer other claimed issues requiring additional evidence.

Under the guidance of the Special Initiative, a veteran could not appeal any decision in a provisional rating. In spite of VBA officials stating that provisional ratings protect veterans' appeal rights and effectively extend the appeal window, we found this did not hold true. Provisional ratings actually delayed veterans' appeal rights until final decisions were made on their claims. Once provisional ratings are finalized, veterans receive the standard 1 year to appeal the final decisions.

**Misrepresentation  
of VBA's  
Workload**

With the inception of the Special Initiative, VBA instituted two changes that misrepresented its reported progress toward eliminating the backlog as well as other claims processing statistics.

First, VBA normally defines claims as pending until all required actions are completed. Under the Special Initiative, VBA considered claims to be complete upon issuance of provisional ratings, even though final decisions had not been made. VBA removed these provisionally-rated claims from the backlog while veterans were still awaiting final decisions. This made the backlog appear lower as provisional ratings were issued.

*For example, at the end of June 2013, following completion of the Special Initiative, VBA reported 516,922 rating claims pending in its backlog, but only 1,258 rating claims pending over 2 years. For that same time frame, we estimated 7,823 veterans with provisionally-rated claims that had been removed from the inventory were still waiting for final decisions. These 7,823 provisionally-rated claims represent less than 2 percent of VBA's reported backlog. However, they represent approximately 12 percent of claims completed under the Special Initiative.*

The policy change led to inaccurate reporting of VBA's workload statistics on the number of pending claims and how long they remained pending, as well as the number of completed claims and how long it took to complete them. With intermediate ratings, claims remain pending from the date VA receives the claims until all issues are decided, accurately reflecting VBA's pending and completed workloads. However, using provisional ratings, VBA's pending workload appeared lower, and its completed workload appeared better than it actually was by counting claims as completed before work was actually finished.

*For example, VBA reported that as of the end of June 2013, all rating claims had been pending an average of 237.9 days. However, we estimated the average days pending at 244.5 days for all rating claims, including provisionally-rated claims.*

Second, VBA normally measures the number of days a claim is pending from the date of claim, defined as the earliest date VA received the claim in any of its facilities. However, following receipt of additional evidence on a provisional rating, staff were to establish a new rating claim using the date of receipt of that evidence as the new date of claim. This policy change kept the newly established claims from immediately becoming part of the backlog, making the claims appear more recent than they actually were. This also made VBA's workload statistics on average days claims were pending appear even smaller. Then, once staff issued final ratings, it appeared that VBA completed these claims twice, calculating the average days to complete claims to be even lower.

*For example, in one case, VARO staff at one facility completed a provisional rating, denying one issue while they waited for additional evidence. They closed the claim with the provisional rating. The VARO took credit for completing this claim in 806 days. VBA also no longer considered this veteran to have a rating claim pending while the VARO waited for required evidence to support the one provisionally-denied issue. Upon receiving the additional evidence, VARO staff established another rating claim, which they reported completing in 1 day after they issued a final rating. However, this veteran actually waited a total of 901 days to receive a final decision on the entire claim.*

**Lack of Focus  
on Expediting  
Benefits  
Delivery and  
Finalizing  
Provisional  
Ratings**

Under the Special Initiative, VBA lacked focus on expediting benefits delivery and ensuring finalization of provisional ratings. The provisional ratings policy resulted in decisions that removed these claims from the pending inventory, but did not promote quicker delivery of benefits to aid veterans. VAROs also did not place priority on finalizing provisional claims once they were no longer considered part of the backlog.

We estimated 6,860 veterans who received provisional ratings during the Special Initiative were still waiting for final decisions as of January 2014, 6 months after the Initiative had ended. Further, in 3 of 35 cases we reviewed, VBA did not ensure existing electronic system controls were in place to identify and manage claims that received provisional ratings. As a result, some veterans with provisionally-rated claims may never have received final decisions if not for our review. Information identifying these claims was provided to VBA during the course of our inspection.

**Policy Did not  
Result in  
Quicker  
Benefits  
Delivery**

VBA's Under Secretary for Benefits set expectations that provisional ratings would provide benefits more quickly. Specifically, in an April 19, 2013, news release announcing implementation of the Special Initiative, the Under Secretary for Benefits stated, "Issuing provisional decisions not only provides veterans with applicable benefits much more quickly, but also gives them an additional one-year safety net to submit further evidence should it become available." The Under Secretary echoed this statement in May 22, 2013, testimony before the House Committee on Veterans' Affairs, indicating that provisional ratings allowed many veterans who had waited the longest to begin collecting compensation benefits more quickly. Further, VBA public affairs guidance, which provided answers to anticipated questions about the Special Initiative, repeated the Under Secretary's remarks cited in the April 19, 2013, news release.

Despite the expectations set forth, discussions with senior VBA officials disclosed that the Special Initiative policy was to help quickly provide decisions to veterans who had been waiting for excessive time, and process and remove the oldest claims from VBA's inventory. This was part of

VBA's overall strategy to meet the Secretary's goal of eliminating the claims backlog by 2015.

VBA's Director of Compensation Service further stated that the Special Initiative was necessary to focus VAROs nationwide on the backlog since the business practices in effect could not successfully eliminate it. The Director said VBA wanted to move large pieces of the backlog, and provisional ratings enabled them to close these claims. Other VBA officials concluded the Special Initiative was the right thing to do for veterans who had waited the longest for decisions on their claims. When provisional ratings were no longer needed, VBA discontinued this rating process.

Although the Director of Compensation Service said provisional ratings provided veterans with decisions more quickly, he was unable to provide a scenario where provisional ratings delivered benefits more quickly than intermediate ratings. We found that with this Special Initiative, VBA actually created a new practice that adversely affected some veterans. In contrast to previously established procedures, VARO staff could issue provisional ratings and close claims without obtaining all required evidence. Per VBA policy, staff were then to eliminate the claims from the inventory since they had rated all of the issues, thereby supporting the Special Initiative's intended focus of helping eliminate the backlog.

Given these outcomes, several managers and staff at VAROs we visited told us that provisional ratings were a bad idea and negatively impacted veterans. We received similar feedback from staff at the Boston, Phoenix, and Seattle VAROs that provisional ratings were not good for veterans because they had not obtained all required evidence. Without all required evidence, veterans may not receive correct benefits or all benefits to which they are entitled.

*Lack of Priority  
on Finalizing  
Provisional  
Claims*

Generally, VAROs did not place priority on tracking and finalizing provisionally-rated claims once they were no longer considered part of the backlog. Management and staff at the Cleveland, Columbia, Houston, and Los Angeles VAROs told us that these claims were not priorities. They focused on processing claims still included in the pending workload, which they prioritized based on the date they were received. The Director of Compensation Service stated that VAROs had been directed to work provisionally-rated claims and provide final decisions; he did not know why staff were not following this guidance.

Further, provisionally-rated claims were not prioritized after staff received additional evidence to process final decisions on these claims. Per VBA guidance, staff were to establish a new rating claim after closing a provisionally-rated claim using the date VA received additional evidence as the new date of claim. By not using the date each claim was originally received, these claims appeared much newer than they were and lost the processing priority they should have received based on their true age. We

determined that if staff had completed intermediate ratings instead of provisional ratings, these claims would have remained pending in the backlog and the claims would have received commensurate priority and an appropriate level of transparency based on their date of receipt.

As a result of the lack of priority on finalizing provisional ratings, many veterans were still waiting to receive final benefits decisions months after the initiative had ended. As of September 2013, VARO staff had not completed final ratings in 29 (83 percent) of 35 cases we reviewed.

- In 12 of the 29 cases, VARO staff had taken no action to obtain the missing evidence needed to make decisions on the provisionally-rated claims. For example, in 1 of the 12 cases, the Los Angeles VARO transferred a claim to the Huntington VARO for processing. Huntington VARO staff issued a provisional rating because they needed Federal records to support one issue they provisionally denied; as such, they returned the case to Los Angeles. Los Angeles VARO staff had taken no action to obtain the Federal records as of September 2013. By that time, over 4 months had elapsed from the date of the provisional rating. In total, the veteran had been waiting over 3 years and 1 month to receive a final decision. However, VBA no longer included this claim as pending in the backlog because of the provisional rating.
- Staff initiated efforts to obtain required evidence such as VA medical examinations and federal records in 4 of the 29 provisional cases, but had not yet received it.
- In the remaining 13 cases, VARO staff completed efforts to obtain the missing evidence but had not yet issued final ratings. In 1 of these 13 cases, Los Angeles VARO staff issued a provisional rating because they needed a VA medical examination for one issue they provisionally denied. Staff received the VA examination on May 24, 2013. Over 3 months elapsed after receipt of the VA examination, but staff had not completed a final rating at the time of our review in September 2013. The veteran had been waiting over 2 years and 2 months to receive a final decision, but VBA did not consider this claim as pending in the backlog because of the provisional rating.

We reviewed the electronic record for the 29 provisionally-rated claims again in January 2014 to determine whether VARO staff had finalized them. Only three additional cases received final decisions from September 2013 to January 2014. The remaining 26 veterans had been waiting for final decisions an average of over 3 years from the date VA originally received these claims.

Using its method of calculating workloads, VBA reported only 224 rating claims pending over 2 years as of the end of December 2013. However, based on our sample results, we estimated 6,860 veterans who had received

provisional ratings on their aging claims were still waiting for final decisions at that time.

*Controls  
Lacking to  
Ensure Claims  
Finalization*

VBA did not always ensure existing controls were functioning as intended to ensure finalization of provisional claims. For intermediate ratings, VARO staff controlled and completed claims using existing end products for monitoring and managing the pending workload.<sup>1</sup> In contrast, after clearing provisionally-rated claims from the pending inventory, VARO staff were required to establish and maintain new controls—end products as well as suspense diaries—in the electronic system as a reminder of the need for future actions to finalize these claims. Staff were required to identify instances where these controls were related to provisionally-rated claims, given that the controls were not originally designed for provisional rating purposes.

We found this policy change increased the potential for staff to lose control of these claims. Specifically, in 3 of 35 claims with provisional ratings, VBA did not ensure existing required controls were in place to track and finalize these claims. In all three cases, VARO staff established controls at the time they issued provisional ratings but removed them prior to completing final decisions on all claimed issues. As a result, these veterans' claims had the potential to never receive final decisions with appeal rights if we had not identified them during our review. VBA needs to take steps to ensure it does not lose control of all other provisionally-rated claims.

Moreover, we are concerned that VBA did not have adequate controls in place to accurately identify all provisionally-rated claims that needed to be tracked and managed through to finalization. In August 2013, VBA provided us with a list of 7,513 cases with provisional ratings completed under the Special Initiative. However, VBA's list included 232 claims that did not have a date of claim on or before July 1, 2011. Further, 10 of the 35 provisional ratings that were part of our sample were not included on VBA's list. Interviews with VBA management revealed they did not have a way to guarantee they identified all provisional ratings to process the further actions needed.

**Conclusion**

VBA planned the Special Initiative to help veterans who had been waiting the longest for benefits decisions. However, VBA created procedures involving provisional ratings that were inconsistent with existing workload practices and misrepresented VBA's workload statistics and progress towards eliminating the claims backlog. Because of the provisional rating policy, veterans still awaiting final decisions were negatively affected because their claims were no longer a priority. The only decisions VBA

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<sup>1</sup> End products are the work units VBA uses to properly control pending workloads and appropriately measure work credit. End products have specific codes to identify types of claims or actions required.

could provide more quickly using provisional ratings were denials. Such provisional rating decisions could not be appealed until the claims were finalized, which often was not a priority. We concluded use of the existing policy and processing of intermediate ratings would have been more beneficial to veterans. Because VBA has already stopped allowing provisional ratings, we made no recommendation to discontinue this policy.

## Recommendations

1. We recommended the Under Secretary for Benefits implement a plan to identify all provisionally-rated claims and ensure the proper controls are entered in the electronic system to track, manage, and complete them.
2. We recommended the Under Secretary for Benefits implement actions to include provisionally-rated claims in the rating inventory and correct the aging of provisional claims in pending workload statistics.
3. We recommended the Under Secretary for Benefits implement a plan to expedite final decisions on all issues in provisionally-rated claims.

### *Management Comments*

The Under Secretary for Benefits concurred with our recommendations and directed a complete review of all provisional rating decisions on June 2, 2014. Further, VBA established procedures to closely monitor and track provisional claims under end product (EP) 934. Finally, VBA has provided direction to VAROs on the review and finalization of provisional rating decisions. VBA anticipates completion of these recommendations by September 1, 2014.

### *OIG Response*

The Under Secretary for Benefits comments and actions are responsive to the recommendations. However, VBA must ensure provisional claims are identified and strictly controlled so they can be completed. VBA also must ensure provisional claims are included in their inventory to accurately reflect claims processing timeliness.

## **Finding 2      VBA's Special Initiative Did Not Always Provide Accurate Rating Claims Decisions**

VBA did not accurately process 77 (32 percent) of 240 rating decisions in our statistical sample of claims completed under the Special Initiative. Generally, errors associated with ratings completed under the Special Initiative occurred because VARO management and staff felt pressured to complete these claims within VBA's 60-day processing deadline. We project that VARO staff inaccurately processed 17,600 of 56,500 claims, resulting in about \$40.4 million in improper payments during the period of the Special Initiative.

### ***Inaccuracies in Claims Processing***

VARO staff incorrectly processed 29 (83 percent) of 35 provisional rating decisions. VAROs issued provisional ratings for cases awaiting certain evidence, such as private treatment records. Following are types of inaccuracies related to provisional decisions processed by VARO staff under the Special Initiative.

- Issued provisional ratings without acquiring and reviewing the required minimal level of evidence, such as VA examinations and STRs.
- Issued provisional ratings, but failed to establish all required controls in the electronic system for follow-up actions.
- Issued provisional ratings, but failed to decide all issues claimed by veterans.
- Assigned incorrect effective dates for payment of compensation benefits associated with veterans' disabilities.
- Issued provisional ratings even though final decisions were warranted because VBA had received all evidence required to support final ratings.
- Issued a provisional rating and incorrectly provided the veteran with appeal rights, which were not allowed under the Special Initiative.

Further, VARO staff incorrectly processed 48 (23 percent) of 205 final rating decisions we reviewed. VAROs issued final ratings for ready-to-rate claims and for cases where they assigned the highest evaluation in the VA's Schedule for Rating Disabilities for each claimed disability. Following are types of inaccuracies related to final decisions processed by VARO staff under the Special Initiative.

- Did not obtain all evidence required to decide the claims, such as VA examinations and medical treatment records.
- Assigned incorrect evaluations for veterans' disabilities.
- Assigned incorrect effective dates for payment of compensation benefits associated with veterans' disabilities.

- Did not decide all issues claimed by veterans or inferred under VBA policy.
- Did not properly notify veterans of decisions made or of the evidence required to support their claims.
- Completed final ratings but did not establish or maintain end products to control additional required actions.
- Did not reduce or discontinue veterans' compensation benefits as required by VBA policy.
- Incorrectly granted service connection for a veteran's disabilities.
- Did not document historical claims decisions in the electronic system as required by VBA policy.
- Did not take action to reopen a veteran's previously denied claim as required by VBA policy.

*Management  
Views on  
Inaccuracies  
Identified*

In 14 (18 percent) of 77 cases, VARO management did not agree with errors we identified. However, management was unable to provide any regulation or policy to warrant a reversal of our determinations. Cases where VARO management disagreed with our findings follow:

- In two cases, staff at the Huntington and Lincoln VAROs determined STRs were incomplete, and incorrectly issued provisional ratings while requests for these records were outstanding. However, management felt they could issue provisional ratings because they had some STRs. VBA officials said they would make sure that applicable STRs were available in all cases, and staff were prohibited from issuing provisional ratings while there were outstanding requests for STRs.
- In two cases, the Lincoln VARO incorrectly issued provisional ratings while VA medical examination requests were pending. Staff requested new VA examinations because they determined the examinations of record were insufficient. Management felt it could issue provisional ratings in these cases since VA examinations were of record, albeit insufficient. However, VBA policy states that all necessary VA examinations must be completed and of record prior to issuing a provisional rating.
- In one case, the New York VARO issued a final rating and assigned an incorrect evaluation for a veteran's service-connected migraine headaches. A Rating Veterans Service Representative (RVSR) misinterpreted the medical evidence and assigned a 10 percent evaluation. Management felt the condition still warranted a 10 percent evaluation based on the frequency of the veteran's headaches, but they did not take into account the severity of the headaches. Based on both the frequency and severity of the headaches, a noncompensable evaluation was required per VA's Schedule for Rating Disabilities.

- In one case, the Waco VARO issued a final rating based on insufficient medical evidence. Management stated the final decision was based on current medical evidence that was deemed sufficient for rating purposes. However, VARO staff noted the available evidence was unreliable, and more current evidence had not yet been received. Although VARO staff should have waited to obtain complete and up-to-date medical evidence, they said management directed them to decide the claim based on the evidence of record. Issuing the final rating without available evidence resulted in an unsupported increase in the combined rating to 90 percent disabling, and the veteran's compensation increased by \$213 per month. Without medical evidence to properly support the disability percentage, VBA lacks assurance that the veteran is receiving correct monthly payments.

***Inaccuracies  
Were Due to  
Pressure to  
Process  
Claims***

Generally, these errors occurred because VARO management and staff felt pressured to complete Special Initiative claims within VBA's 60-day processing deadline. For example, staff at the Houston, Huntington, and Waco VAROs reported they felt pressured to make final or provisional decisions without all of the necessary evidence in order to close the claims. Similarly, management at the Houston and New York VAROs felt that mistakes could have been the result of pressure to complete the Special Initiative on time.

VBA mandated that quality continue to be assessed on decisions made under the Special Initiative. However, management at the Lincoln and Waco VAROs discontinued quality reviews on these claims for the final 2 weeks of the Special Initiative due to pressure to meet the processing deadline. Further, management at the Los Angeles VARO directed staff, "When in doubt, rate provisionally. Don't be afraid to 'go there'. The[y] ... [local and national quality reviewers] are not calling errors on provisional ratings."

Under the Special Initiative, VBA implemented a new policy for provisional ratings that was significantly different from existing rating procedures. The Director of Compensation Service stated VAROs had numerous questions about the policy and could have interpreted the guidance inconsistently to process provisional ratings. We found noncompliance among provisional ratings where, in order to make decisions within the deadline, VARO management made local policy determinations that violated Special Initiative evidence requirements. For example, at the Lincoln VARO, some management and staff stated the Special Initiative guidance was confusing. However, they did not seek clarification, but instead, they used their own interpretations of the guidance to process the claims because of pressure to meet the deadline.

Further, at the Los Angeles VARO, management inappropriately directed staff to complete provisional ratings without obtaining required VA medical examinations in order to complete claims by the processing deadline. In

December 2013, we issued a Management Advisory to the Under Secretary for Benefits discussing this inappropriate guidance and the resultant inaccuracies in processing provisional ratings at this VARO. We indicated that VBA provided data showing the Los Angeles VARO completed 532 provisional rating decisions between April 19 and June 19, 2013. VARO staff completed 470 of those 532 provisional rating decisions after the conflicting guidance was disseminated on May 14, 2013. Ten of the 11 provisional rating decisions that we reviewed at this VARO were noncompliant and were completed after May 14, 2013.

VARO staff became aware of the conflicting guidance on June 17, 2013, two days prior to the end of the 60-day claims processing initiative and issued corrective guidance. Despite issuance of this guidance, we were concerned that a similar high error rate potentially existed among the remaining 460 claims that the VARO processed after the guidance was disseminated. In response to our Management Advisory, the Under Secretary stated she was aware of the incorrect guidance at the Los Angeles VARO and that they took action “to ensure full compliance with VBA policies and guidance.”

***Inaccuracies Resulted in Incorrect Benefits Decisions***

As a result of the processing inaccuracies, veterans did not consistently receive correct benefits decisions. Based on our sample projection results, we project VARO staff inaccurately processed 17,600 of 56,500 claims, resulting in \$40.4 million in improper payments.

For the eight VAROs included in our review, Table 1 on the next page reflects the errors affecting veterans’ benefits, those with the potential to affect veterans’ benefits, and those that did not comply with requirements of the Special Initiative and had no effect on benefits. Claims with more than one type of error are included in multiple categories.

**Table 1. Disability Claims Processing Accuracy Under the Special Initiative**

Type of Decision	Total Claims Reviewed	Claims Inaccurately Processed	Claims Inaccurately Processed Affecting Veterans’ Benefits	Claims Inaccurately Processed With Potential To Affect Veterans’ Benefits	Claims Inaccurately Processed With No Effect on Veterans’ Benefits
Provisional Ratings	35	29	2	8	26
Final Ratings	205	48	20	32	0
<b>Total</b>	<b>240</b>	<b>77</b>	<b>22</b>	<b>40</b>	<b>26</b>

*Source: VA OIG analysis of provisional and final rating decisions completed from April 19, 2013, through June 19, 2013, under VBA's Special Initiative*

*Inaccuracies  
Affecting  
Benefits*

Available evidence showed that 22 of the 77 cases we identified with processing errors affected veterans' benefits. The errors resulted in 479 improper regular monthly payments to 22 veterans totaling \$175,835 from September 2006 through September 2013.

Details on the most significant overpayment and underpayment follow:

- An RVSR at the Waco VARO completed a final rating decision and correctly granted a veteran entitlement to an additional special monthly benefit based on blindness in both eyes. However, the effective date of February 3, 2012, was incorrect because the date used to calculate benefits was not the date of entitlement. The actual date of entitlement to benefits was March 7, 2013. As a result, VA overpaid the veteran \$45,055 over a period of 13 months.
- An RVSR at the Lincoln VARO completed a final rating decision but did not assign additional compensation for a veteran's disabilities affecting both arms and legs, as required by VBA policy. As a result, VA underpaid the veteran \$15,942 over a period of 7 years.

*Inaccuracies  
With the  
Potential to  
Affect Benefits*

In 40 cases, we identified processing errors that had the potential to affect veterans' benefits. These included cases where the inaccuracies did not impact current compensation payments but could impact future benefits. For example, such errors could affect future compensation payments if veterans claim additional disabilities or if their current disabilities improve or worsen. In other cases, we could not determine whether or not the inaccuracies would impact compensation payments due to a lack of evidence in the claims files.

*Inaccuracies  
Not Affecting  
Benefits*

VARO staff failed to comply with VBA's policy for provisional ratings in 26 cases. These were procedural errors that did not affect veterans' benefits. In some cases, VARO staff issued provisional ratings prior to obtaining the minimal required evidence. In other cases, VARO staff did not establish all of the required controls in the electronic system needed for tracking and follow-up actions on provisional ratings.

**Conclusion**

VARO management and staff did not always follow VBA policy and inaccurately processed claims under the Special Initiative. Pressure to complete claims by VBA's 60-day deadline led to staff making decisions without all necessary evidence and management discontinuing local quality reviews. Further, VBA implemented a provisional rating policy that was significantly different from existing procedures, and VAROs sometimes interpreted the new policy incorrectly. VBA's Director of Compensation Service conceded VAROs had numerous questions about the policy and could have interpreted the guidance inconsistently. We project VARO staff inaccurately processed 17,600 of 56,500 claims, resulting in \$40.4 million in improper payments.

## Recommendation

4. We recommended the Under Secretary for Benefits implement actions to complete quality reviews to ensure accuracy of all provisionally-rated claims processed under this Special Initiative.

*Management  
Comments*

The Under Secretary for Benefits concurred with our recommendation and has directed VARO Quality Review Specialists to conduct reviews of all provisional rating decisions to determine if the ratings were completed properly. VBA anticipates completion of this review by September 1, 2014.

*OIG Response*

The Under Secretary for Benefit comments and actions are responsive to the recommendation.

## Appendix A Background

### *Purpose of VBA's Special Initiative*

The Special Initiative to Process Rating Claims Pending Over 2 Years was the first in a series of efforts by VBA to address their oldest claims. At the end of March 2013, VBA reported nearly 43,000 rating claims were pending more than 2 years. VBA attributed its aging claims inventory to various reasons, including competing workload priorities and insufficient human capital resources. VBA's intent with the Special Initiative was to prioritize and complete all claims received on or before July 1, 2011, within 60 days from April 19, 2013, the start of the initiative.

### *VBA Guidance for Implementing the Special Initiative*

VBA directed VAROs to devote all necessary personnel to ensure all 2-year old claims were completed. According to VBA, VARO staff were to immediately process these claims and develop an aggressive plan based on the available evidence in the veterans' claims folders. VBA directed VARO staff to consider two categories when processing these claims:

**Category 1 Cases (Final Decisions):** VAROs were to issue rating decisions as normal for ready-to-rate cases that met the 2-year old criteria and for cases where the rating provided the highest evaluation authorized in VA's Schedule for Rating Disabilities for each claimed issue. These were to be considered final decisions and appeal rights were to be provided.

**Category 2 Cases (Provisional Decisions):** VAROs were to issue provisional rating decisions for other 2-year old cases even if VA was still waiting for certain evidence. VBA stated these provisional decisions would allow eligible veterans to begin collecting compensation benefits more quickly. RVSRs were instructed to complete these claims based on the available evidence of record, as long as the appropriate notice was provided to the veteran, unless the following requests for evidence were outstanding:

- Service treatment records
- VA medical records
- Any evidence needed to establish veteran status or pertinent service dates
- VA examinations, if required

In any case where the VARO was waiting for VA examination results, staff were directed to contact the appropriate examination provider to expedite completion of the required examination so that a decision could be issued promptly. New examinations were to be ordered only when they were required to decide the claim. Further, no appeal rights were to be provided since the decisions were considered provisional. If the VARO staff received all of the evidence at any time during the 1-year period after it issued the provisional decision, they were to take the appropriate adjudicative action and issue a final rating decision with appeal rights. After 1 year, or earlier if

the veteran made a request, the veteran was to be notified that the claim was final and provided appeal rights.

The Special Initiative required VARO staff to input end products in the electronic system to develop claims for additional evidence. End products are the work units VBA uses to properly control pending workloads and appropriately measure work credit. End products have specific codes to identify types of claims or actions required. VAROs were also required to assess all claims with provisional ratings 1 year from the date of notification and provide final decisions with appeal rights. Therefore, they had to establish additional end products or diaries in the electronic system to remind them of the need to review these cases. Diaries are processing commands that establish dates when VARO staff must take future actions. When the diaries mature, the electronic system will generate reminder notifications for VARO staff to provide final decisions. Finally, VARO staff were required to identify these controls as related to provisional ratings because they were not used exclusively for this purpose.

## Appendix B Scope and Methodology

### **Scope**

We conducted our review from July 2013 through April 2014. The review focused on a population of about 56,500 rating claims received on or before July 1, 2011, that were completed from April 19, 2013, through June 19, 2013. We used VBA's Corporate Database to identify these claims.

### **Methodology**

To accomplish our objectives, we reviewed applicable laws, regulations, policies, procedures, and guidelines. We also interviewed appropriate management and employees. In coordination with the VA Office of Inspector General statistician, we developed a sampling methodology that required the review of eight VAROs nationwide. We inspected the Cleveland, Ohio; Columbia, South Carolina; Houston, Texas; Huntington, West Virginia; Lincoln, Nebraska; Los Angeles, California; New York, New York; and Waco, Texas VAROs between September 2013 and December 2013. We reviewed 30 claims selected statistically from each of the 8 VAROs, totaling 240 claims. For each of the 240 sampled claims, we reviewed claims folders as well as electronic records and determined whether they received provisional or final ratings. Appendix C provides details on the statistical sampling methodology and projections.

### **Data Reliability**

We used computer-processed data from the Veterans Service Network's Operations Reports and Awards. 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 assessed whether the data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Further, we compared veterans' names, file numbers, Social Security numbers, VARO numbers, dates of claim, and decision dates as provided in the data received with information contained in the claims folders we reviewed.

Our testing of the data disclosed that they were sufficiently reliable for our review objectives. Our comparison of the data with information contained in the veterans' claims folders reviewed as part of our review of the eight VAROs did not disclose any 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*. We planned and performed the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our review objectives.

## Appendix C Comparison of Intermediate and Provisional Rating Processes

Table 2 compares VBA's Intermediate and Provisional Rating Processes.

**Table 2. Comparison of Intermediate and Provisional Rating Processes**

VBA Policy	Intermediate Ratings	Provisional Ratings
Evidence Requirements	<ul style="list-style-type: none"> <li>Any evidence that allows a claimed issue to be granted</li> </ul>	<ul style="list-style-type: none"> <li>Specific evidence required, whether or not benefits can be granted</li> <li>Evidence requirements:                             <ul style="list-style-type: none"> <li>appropriate notice to veterans</li> <li>no outstanding requests for service treatment records, VA medical records, required VA medical examinations, and documentation of veteran status or pertinent service dates</li> </ul> </li> </ul>
Decisions Allowed	<ul style="list-style-type: none"> <li>Benefits granted for at least one issue</li> <li>Decisions made on all claimed issues for which sufficient evidence is obtained and benefits can be granted</li> <li>Decisions deferred on all issues requiring additional evidence</li> </ul>	<ul style="list-style-type: none"> <li>No requirement to grant benefits</li> <li>All issues either provisionally granted or denied</li> <li>No issues deferred</li> </ul>
Claim Status	<ul style="list-style-type: none"> <li>Claim remains pending from date of receipt until all issues are decided</li> </ul>	<ul style="list-style-type: none"> <li>Claim closed upon provisional rating issuance, although all evidence not received</li> <li>New claim subsequently established upon receipt of additional evidence</li> <li>New claim closed upon final rating decision</li> </ul>
Management Control	<ul style="list-style-type: none"> <li>Existing electronic system controls used to manage and complete claims</li> </ul>	<ul style="list-style-type: none"> <li>New electronic system controls established to manage and complete claims</li> </ul>
Appeal Rights	<ul style="list-style-type: none"> <li>Appeal rights provided for all decisions on claimed issues</li> </ul>	<ul style="list-style-type: none"> <li>No appeal rights provided until claim decisions are finalized</li> </ul>

Source: VA OIG analysis of VBA policies for intermediate and provisional ratings

## Appendix D Statistical Sampling Methodology

### Approach

We reviewed a representative sample of rating claims completed during the Special Initiative to determine whether VBA followed policy and accurately processed rating claims, and to assess the effectiveness of VBA's policy for completing provisional ratings in providing veterans compensation benefits more quickly and helping to eliminate VBA's claims backlog. We used statistical sampling to quantify the number of errors VARO staff could have made, project potential monetary impact, estimate the number of provisional ratings still requiring final decisions as of June 2013 and January 2014, and rating claims average days pending as of June 2013.

### Population

The population included about 56,500 rating claims received on or before July 1, 2011, that were completed during VBA's Special Initiative from April 19, 2013, through June 19, 2013. We excluded the VAROs in Anchorage, Alaska; Honolulu, Hawaii; Manila, Philippines; and San Juan, Puerto Rico from the universe due to the increased cost of travel to those areas. Additionally, we excluded the Washington, D.C. VARO and Appeals Management Center from the universe. Together, these 6 offices represented 1,347 claims that were removed from the universe.

### Sampling Design

We conducted a two-stage random sample. In the first stage, we selected 8 statistically-sampled VAROs from 53 sites using a Probability Proportional to Size sampling approach. In the second stage, we selected a random sample of 30 claims from each of the selected VAROs totaling 240 claims completed. All claims had the same probability of being selected to allow making a projection over the whole population from all 53 sites.

Table 3 provides the number of completed claims at the eight VAROs selected during the period of April 19, 2013, through June 19, 2013.

**Table 3. Number of Completed Claims at Sample Sites**

VARO Location	Number of Claims
Cleveland, Ohio	3,779
Columbia, South Carolina	2,052
Houston, Texas	3,096
Huntington, West Virginia	953
Lincoln, Nebraska	1,036
Los Angeles, California	1,932
New York, New York	1,180
Waco, Texas	4,900
<b>Total</b>	<b>18,928</b>

*Source: VA OIG analysis of the universe of VA's rating claims completed from April 19, 2013, through June 19, 2013, under VBA's Special Initiative for selected sites*

**Weights**

We calculated estimates in this report using weighted sample data. Sampling weights are computed by taking the product of the inverse of the probabilities of selection at each stage of sampling.

**Projections and Margins of Error**

We used WesVar software to calculate the weighted universe estimates and associated sampling errors. WesVar employs replication methodology to calculate margins of error and confidence intervals that correctly account for the complexity of the sample design.

The margins of error and confidence intervals are indicators of the precision of the estimates. If we repeated this review with multiple samples, the confidence intervals would differ for each sample but would include the true population value 90 percent of the time. For example, we are 90 percent confident the true universe of processing errors for claims completed during the Special Initiative is between 15,100 and 20,200. For each estimate, we used the midpoint of the 90 percent confidence interval.

Table 4 shows the review projections for the attributes described.

**Table 4. Summary of Projections and Confidence Intervals (\$ in millions)**

<b>Results</b>	<b>Projections</b>	<b>Lower Limit 90% Confidence Interval</b>	<b>Upper Limit 90% Confidence Interval</b>
Provisionally-Rated Claims Awaiting Final Decisions June 2013	7,823	7,624	8,021
Rating Claims Average Days Pending June 2013	244.5	243.9	245.0
Provisionally-Rated Claims Awaiting Final Decisions January 2014	6,860	6,593	7,127
Processing Errors—Claims*	17,600	15,100	20,200
Processing Errors—Amounts*	\$40.4	\$20.6	\$60.3

*Source: VA OIG statistician's projection of status of claims, rating claims average days pending, and processing errors*

\* Indicates projections have been rounded

## Appendix E Potential Monetary Benefits in Accordance With Inspector General Act Amendments

Recommendation	Explanation of Benefits	Better Use of Funds	Questioned Costs
4	We estimated claims processing inaccuracies resulted in improper payments of \$40.4 million.	\$0	\$40,400,000
<b>Total</b>		<b>\$0</b>	<b>\$40,400,000</b>

## Appendix F Under Secretary for Benefits Comments

### Department of Veterans Affairs

# Memorandum

**Date:** July 10, 2014

**From:** Under Secretary for Benefits (20)

**Subj:** OIG Draft Report—Review of the Special Initiative To Process Rating Claims Pending Over 2 Years

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

1. Attached is VBA's response to the OIG's Draft Report: Review of the Special Initiative To Process Rating Claims Pending Over 2 Years
2. Please refer questions to Christine Ras, Program Analyst, at 461-9057.



Allison A. Hickey

Attachment

**Attachment**

**Veterans Benefits Administration (VBA)**

**Comments on OIG Draft Report**

**Review of the Special Initiative To Process Rating Claims Pending Over 2 Years**

**The Veterans Benefits Administration provides the following comments:**

In March 2013, the claims backlog hit its peak at 611,000 claims. The Department of Veterans Affairs (VA) launched a special initiative in April 2013 to issue decisions on the oldest claims in the disability claims backlog. Over 513,000 of the longest-pending claims were covered under this initiative, including nearly 500,000 claims that received final ratings based on the availability of all relevant evidence. Approximately 14,800 of these Veterans (less than 3 percent) received "provisional" rating decisions if evidence was outstanding, but all essential evidence, such as VA examinations and service treatment records, were available.

Provisional decisions were issued during this initiative in order to provide benefits more quickly to eligible Veterans who had been waiting the longest for decisions on their claims, while at the same time giving them an additional 1-Year safety net to submit further evidence should it become available, before a final decision.

At anytime during the 1-year timeframe, Veterans could indicate that they did not have additional information and request that the provisional decision be made final. In all cases, Veterans have the same statutory 1-year period to appeal the final decision if they disagree.

The purpose of the provisional decisions was to get benefits to Veterans more quickly. Veterans who received provisional decisions had an additional one-year period to submit further evidence or seek review. The final rating process provides further assurance that Veterans who received provisional decisions are receiving the benefits they have earned.

**The following comments are submitted in response to the recommendations in the OIG draft report:**

Recommendation 1: We recommend the Under Secretary for Benefits implement a plan to identify all provisionally rated claims and ensure the proper controls are entered in the electronic system to track, manage, and complete them.

VBA Response: Concur. The Under Secretary for Benefits directed a complete review of all provisional rating decisions on June 2, 2014. VBA's Compensation Service issued Fast Letter 14-05, "Finalizing and File Review: Provisional Ratings on Two and One Year Old Claims", directing all regional office Quality Review Teams to review all provisional decisions to determine if the ratings were completed properly, if a final rating is now warranted, or if further development is necessary. The final ratings will be completed no later than September 1, 2014, or at least one year after the provisional rating was issued (whichever is later), unless additional evidence needed to correctly decide the claim remains outstanding. The Fast Letter also included instructions for proper control of these claims in VBA's electronic processing system. Compensation Service is working closely with the Office of Field Operations and the Area Offices to ensure proper tracking and reporting of the status of the provisional claim review through to completion of all final rating decisions.

Target completion date: September 1, 2014.

Recommendation 2: We recommend the Under Secretary for Benefits implement actions to include provisionally rated claims in the rating inventory and correct the aging of provisional claims in pending workload statistics.

VBA Response: Concur in principle. VBA agrees that it is essential to track the provisional claim reviews and ensure that any additional benefits due to these Veterans are paid from the original date of claim. We

have established procedures to closely monitor and track these claims under end product (EP) 934. At the time the provisional decision was issued, the regional office received appropriate work credit for deciding a rating claim. Veterans were then given a year to provide evidence for consideration before a final decision is rendered. Assigning another rating EP to the final decision on these claims would be inappropriate, as the regional office already received all appropriate work credit. The 934 EP is a "non-credit" EP, and therefore not counted as a second completed claim in a regional office's production numbers. VA will continue to work with the OIG to ensure careful monitoring and expeditious handling of these claims.

Target completion date: September 1, 2014.

Recommendation 3: We recommend the Under Secretary for Benefits implement a plan to expedite final decisions on all issues in provisionally-rated claims.

VBA Response: Concur. As discussed in response to the previous recommendations, Fast Letter 14-05, "Finalizing and File Review: Provisional Ratings on Two and One Year Old Claims", dated June 2, 2014, provides direction to the ROs on the review and finalization of provisional rating decisions.

Target Completion Date: September 1, 2014

Recommendation 4: We recommend the Under Secretary for Benefits implement actions to complete quality reviews to ensure accuracy of all provisionally rated claims processed under this special initiative.

VBA Response: Concur. As provided in Fast Letter 14-05, "Finalizing and File Review: Provisional Ratings on Two and One Year Old Claims", dated June 2, 2014, regional office Quality Review Specialists are conducting the reviews of all provisional rating decisions to determine if the ratings were completed properly. If additional actions are required, the Quality Review Specialists will provide directed development. Compensation Service is working closely with the Office of Field Operations and the Area Offices to ensure proper tracking and reporting.

Target completion date: September 1, 2014.

## **Appendix G Office of Inspector General 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	Brent Arronte, Director Ed Akitomo Orlan Braman Daphne Brantley Brett Byrd Bridget Byrd Vinay Chadha Michelle Elliott Lee Giesbrecht Ambreen Husain Jeff Myers David Pina Dana Sullivan Rachel Stroup Nelvy Viguera Butler Diane Wilson
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## **Appendix H Report Distribution**

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