

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



Veterans Benefits Administration

*Review of
Alleged Problems with
Veterans Benefits
Management System and
Claims Processing*

January 6, 2016
14-04816-72

ACRONYMS

OIG	Office of Inspector General
VA	Department of Veterans Affairs
VARO	VA Regional Office
VBA	Veterans Benefits Administration
VBMS	Veterans Benefits Management System

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Report Highlights: Review of Alleged Problems with VBMS and Claims Processing

Why We Did This Review

In July 2014, the VA Office of Inspector General (OIG) Hotline received an allegation from an anonymous complainant stating that significant problems existed with claims processing and the Veterans Benefits Management System (VBMS) at the VA Regional Office (VARO) in St. Petersburg, FL. The complainant also alleged that a VBMS claims processing tool, "Evaluation Builder," broke down often and incorrectly calculated veterans' disability claims, potentially costing the Government millions of dollars.

What We Found

We substantiated the allegation regarding a significant backlog of unprocessed hard copy veteran material resulting from inefficient preparation and handling of veteran provided documentation at a contractor facility.

More specifically, according to VBA personnel and our observation of VBA portal metrics, the St. Petersburg VARO had more than 41,900 mail packages of veterans' claims material that were backlogged and over 1,600 boxes awaiting processing at the CACI scanning facility. We also observed a significant amount of hard copy veterans' claims evidence that was improperly stored, comingled with contractor documentation, or was disorganized and not ready for scanning.

The significant backlog of unprocessed claims evidence occurred due to a large increase in volume of veterans' claims at the end of 2014 and the VARO's inadequate

preparation of hard copy veteran material for scanning at the contractor facility. Furthermore, VBA did not provide effective oversight of contractor personnel to ensure timely processing or safeguarding of veteran information at the contractor facility.

We did not substantiate the allegation that "Evaluation Builder," broke down often or incorrectly calculated veterans' disability claims.

What We Recommended

We recommended that the Under Secretary for Benefits ensure the St. Petersburg VARO is consistently organizing and mailing hard copy veteran material to contractor scanning facilities. Additionally, we recommended that the Under Secretary for Benefits initiate onsite reviews of the contractor scanning facilities to ensure efficient scanning practices and the proper safeguarding of sensitive VA information at those facilities.

Agency Comments

The Acting Under Secretary for Benefits concurred with our findings and recommendations. The OIG will monitor implementation of the corrective action plans.

A handwritten signature in blue ink that reads "Gary K. Abe".

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

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RESULTS AND RECOMMENDATIONS

Allegation 1 Inefficient Scanning Practices Caused a Significant Mail Backlog at VA Regional Office St. Petersburg

In July 2014, the VA Office of Inspector General (OIG) Hotline received an allegation from an anonymous complainant stating that significant problems existed with claims processing at the VA Regional Office (VARO) in St. Petersburg, FL. Specifically, the complainant alleged that 30,000 pieces of mail were backlogged within the VARO due to inefficient hard copy veterans' claims scanning processes at a contractor facility located in Newnan, GA.

Consequently, claims documentation was not available for evaluation within the Veterans Benefits Management System (VBMS) and claims were processed in the absence of supporting evidence. In 2009, the Veterans Benefits Administration (VBA) initiated efforts to improve its disability claims processing and backlog by modernizing the way it receives and processes veterans' benefits claims. The decision to transition to a completely paperless claims process, that included the scanning and digitization of veteran claims, was intended to help minimize rating inconsistencies and errors, and mishandling of veterans' claims information.

What We Did

In December 2014, we performed an onsite review of the St. Petersburg VARO, interviewed and observed users while they processed and rated claims in VBMS, and requested relevant information from local management. In January 2015, we visited the CACI International Inc. (CACI) scanning facility in Newnan, GA, interviewed contract employees and VA staff, observed scanning operations, and requested relevant data from VA Central Office. Additionally, we analyzed requested data and business processing controls relative to Federal records management standards.

What We Found

We substantiated the allegation regarding a significant backlog of unprocessed veteran material resulting from inefficient preparation and handling of veteran-provided documentation at a contractor facility operated by CACI. Specifically, according to VBA personnel and our observation of VBA portal metrics, the St. Petersburg VARO had more than 41,900 mail packages of veterans' claims material that were backlogged and over 1,600 boxes awaiting processing at the CACI scanning facility. Furthermore, at the contractor facility, we observed numerous pallets of boxes containing significant amounts of hard copy veterans' claims material that required processing and were more than 30 days old according to pallet tracking labels.

To determine the existence of untimely processed claims from the St. Petersburg and other VAROs, we randomly selected 20 hard copy

veterans' claims received from five different VAROs, including St. Petersburg, on pallets that had arrived at the contractor scanning facility for processing. From the sample, we determined that it took an average of 30 days to scan the material from these claims into VBMS after arriving at the scanning facility. Contrary to the results noted above, VA's contract with CACI requires the contractor to scan hard copy veterans' claims evidence into VBMS within 5 calendar days of receipt. VBA personnel stated they were aware of this scanning delay but we found no evidence of VBA prioritizing this issue and taking effective corrective action.

Why This Happened

One reason for the backlog was the inadequate preparation of hard copy veterans material received for scanning at the contractor site. Specifically, at the contractor facility, we observed numerous boxes containing claims material from VARO St. Petersburg and other VAROs arriving in a disorganized state that were not ready for scanning. Within these boxes, we observed commingled loose papers with sensitive information for multiple veterans along with other unrelated VA hardcopy documents, such as blank forms, that were not considered claims evidence.

VBA personnel stated that this type of condition was unacceptable for contractor scanning and the boxes would need to be returned to the VAROs for correction and re-shipment. Figure 1 provides an example of a disorganized box sent from a VARO for processing at the contractor facility. This example of boxed claims folders, without tabs or separators, were counter to VBA's *Shipping Standard Operating Procedure on Veterans Claims Intake Program* that requires VAROs to use document control sheets with manila folders to account for and separate veteran hardcopy claims evidence and then send them to the contractor scanning facilities in approved shipping containers.

Figure 1. Image of Disorganized Veteran Information Not Ready for Scanning



Source: VA OIG, CACI scanning facility in Newnan, GA; January 2015

Another factor contributing to the backlog of unprocessed claims was the large increase of veterans’ claims material shipped from the St. Petersburg VARO to the CACI scanning facility. Consistent with VBA’s transition to a paperless claims process the St. Petersburg VARO began clearing out hardcopy claims from local storage and shipping them to CACI for processing and long-term storage. This effort resulted in a significant backlog of unprocessed veteran claims material at the contractor facility. The table in Figure 2 reflects this increase of boxes not yet scanned from 194 to over 1,600 from November 2014 through January 2015.

Figure 2. St. Petersburg VARO Veterans’ Claim Material Boxes Not Yet Scanned at the CACI Facility

Date	Number of Boxes
November 4, 2014	194
November 18, 2014	406
December 16, 2014	1,199
January 6, 2015	1,251
January 22, 2015	1,639

Source: VA OIG analysis of VBA-provided contractor metrics at the CACI scanning facility. See the Government Standards and Data Reliability section following Allegation 2 in this report

What Resulted

Inadequate preparation of hard copy veteran material for scanning and the large increase of veterans’ claims material shipped to the contractor facility had resulted in delays in processing veteran disability claims in VBMS at the St. Petersburg VARO. Accordingly, we have noted that VBA’s reported “Average Days Pending” for VBMS claims at the St. Petersburg VARO had increased from 152 days in June 2014 to 179 days in December 2014.

Other Issues

During our site visit, we also observed a significant amount VA hardcopy claims material, including personally identifiable and health information, improperly stored at the CACI scanning facility. VA’s *Handbook 6500, VA Information Security Program*, requires that contractors adequately protect the confidentiality, integrity, and availability of sensitive information processed, stored, and transmitted. Despite VA’s information security requirements, in the contractor facility’s rear storage areas, we observed a large amount of hard copy sensitive veteran information haphazardly commingled with contractor company documentation, excess office furniture, and empty computer boxes that appeared to be trash.

The image in Figure 3 demonstrates the extent of improperly stored and commingled veteran information at the contractor site.

Figure 3. Image of Improperly Stored and Commingled Veteran Information



Source: VA OIG, CACI scanning facility's rear storage area, Newnan, GA; January 2015

The improper storage of veteran information occurred because VA did not provide effective oversight of contractor personnel to ensure the effective safeguarding of veteran information at the contractor facility. Without implementing effective controls for storing and safeguarding sensitive VA information, hard copy veterans' claims evidence is potentially vulnerable to loss, theft, and misuse to include identity theft or fraud.

**Overall
Conclusion**

Based on interviews, examination of the contractor scanning facility, and our evaluation of supporting documentation, we substantiated the allegation that the St. Petersburg VARO had a significant backlog of unprocessed veterans' claims information at a contractor facility resulting from inefficient preparation and handling practices. VA had recently reported a reduction in its inventory of veterans' disability claims over 125 days from approximately 557,000 in September 2012 to approximately 177,000 in April 2015. To ensure continued improvement in the overall disability claims backlog, VBA needs to address the disorderly preparation of scanning material at the St. Petersburg VARO and the unsecure storage practices of sensitive veterans' records at the CACI scanning facility.

Recommendations

1. We recommended the Under Secretary for Benefits ensure that the St. Petersburg VA Regional Office is consistently organizing and mailing

hard copy veteran material to contractor scanning facilities and hold the Regional Office Director accountable for compliance.

2. We recommended the Under Secretary for Benefits initiate onsite reviews of the CACI contractor scanning facilities to ensure the timely processing and the proper storage of VA sensitive information at those facilities.

**Management
Comments**

The Acting Under Secretary for Benefits concurred with our findings and recommendations and is requesting closure of the recommendations. However, VBA disagreed with certain technical aspects of our report. More specifically, VBA concurred that a mail backlog existed; however, the backlog was not due to poor preparation or handling and the boxes onsite did not affect mail-processing time. VBA did not provide specific reasons for the mail backlog but stated that 40 percent of the storage boxes at the scanning site were already scanned and awaiting shipment to off-site storage.

VBA concurred that the contractor improperly stored veteran materials at the scanning facility. However, management did not agree with the implied impact of our observations on claims operations or that these materials were unsecure. Rather, VBA contends that the storage area identified in Figure 2 was secure and only contained local training material; not hard copy veteran material.

VBA stated as a result of our findings and their other observations, they increased the number of visits, provided more detailed instructions for site audits, and authorized an onsite government staff member for each contractor scanning site. VBA specified they have outlined detailed shipping instructions for all VAROs and expect to automate claims establishment and evidence mail handling. Per VBA, these changes should reduce mail backlog further without the need to divert claims processing staff to mail management.

OIG Response

We disagree with VBA management's assertion that the existing mail backlog was not in part due to poor preparation or handling, and the boxes on-site did not affect mail-processing time. Our site visits at the St. Petersburg VARO and CACI scanning facility included interviews with VBA and contractor personnel, as well as our observations of the mail backlog's impact on scanning operations. Specifically, we observed that inefficient preparation and handling of some documentation received by CACI hindered the speed of on-site processing and necessitated the return of some veteran material to the VAROs for reprocessing.

During our site visits, VBA and CACI personnel were emphatic about the poor preparation of information at the contractor site and made a point to show us boxes shipped from VAROs that were disorganized and unprepared for scanning. Again, VBA's *Shipping Standard Operating Procedure* on

Veterans Claims Intake Program requires that VAROs properly organize and ship veteran material to the contractor scanning sites.

We also disagree with management's assertion that the significant amount improperly stored VA hardcopy claims material at the scanning facility was secure. In the rear storage area, VBA, contractor, and OIG personnel, observed a large amount of hard copy sensitive veteran information haphazardly commingled with contractor company documentation, excess office furniture, and empty computer boxes that appeared to be trash.

The risk of unauthorized disclosure veteran information is further heightened as we observed malfunctioning video surveillance of the rear storage area, employees freely roaming in this area, and adjacent unlocked and unarmed exit doors to the outside of the building. Accordingly, we stated that without implementing effective controls for storing and safeguarding sensitive VA information, hard copy veterans' claims evidence is potentially vulnerable to loss, theft, and misuse to include identity theft or fraud.

The improper storage of veteran information was not consistent with standards established within CACI's Memorandum of Understanding with VA or the remainder of the facility where veteran material was organized, monitored, and stored on pallets with labeling. VBA and contractor management readily acknowledged that they were unaware of the improper storage of veteran material in the rear storage area until we conducted a walkthrough of this space. We made no statements regarding the impact of improperly storing veteran material relative to claims operations. We will monitor all corrective actions and close the recommendations after we receive evidence that sufficient controls were implemented to address the issues that we identified. Appendix A contains the Acting Under Secretary for Benefits' full response to our report.

Allegation 2 VBMS Claims Processing Tool Frequently Breaks Down and Inaccurately Calculates Veteran Disability Claims

The second allegation in the complainant's July 2014 letter also stated that the VBMS claims processing tool, "Evaluation Builder," broke down often and in some cases incorrectly calculated veterans' disability claims, potentially costing the Government millions of dollars.

What We Did

During our onsite review at VARO St. Petersburg, we observed users while they processed and rated claims in VBMS. Additionally, we reviewed documentation and observed business process and information security controls relative to Federal records management standards. We also met with 48 Rating Veterans Service Representatives at their workstations and observed them rating simple and multiple-condition claims in VBMS with the Evaluation Builder tool. As they rated these claims, we asked specific questions about their experience with the accuracy and reliability of this tool. Finally, we reviewed the previous 2 years of VBMS help desk tickets for Evaluation Builder performance issues.

What We Found

We found no evidence that the VBMS claims processing tool, Evaluation Builder, frequently broke down or incorrectly calculated veterans' disability claims. We observed no technical issues with the tool as we observed raters processing disability claims. VARO St. Petersburg raters also stated that the tool was acceptably accurate. Moreover, our review of VBMS help desk tickets indicated that Evaluation Builder performance issues were not significant and such issues comprised less than 2 percent of the total VBMS help desk ticket population.

Conclusion

Based on our interviews, evaluation of disability claims processing, and analysis of supporting documentation, we did not substantiate the allegation that Evaluation Builder frequently breaks down or incorrectly calculates veteran disability claims. Accordingly, we did not have any recommendations for improvement.

Government Standards and Data Reliability

We conducted this review in accordance with the Council of Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*, except for the data collection and analysis requirement as we attested this information to VA. Specifically, VBA staff provided summary information on benefits claims and evidence backlog metrics, contractor scanning metrics, and Evaluation trouble tickets. We relied on this VBA provided information, as well as information gathered by OIG staff as it related to our review objectives, to support our findings and conclusions. While we did not perform specific testing procedures on the data, we analyzed the summary data for potential errors, inaccuracies, or inconsistencies. Based on our knowledge of the VBMS program, we did not

ensure the validity and reliability of the data obtained from computer-based systems that were significant to our findings.

Accordingly, we determined the summary data provided by VBA was sufficiently reliable as related to the objectives of this review. We did not follow the data collection and analysis requirement because we attested this information to VA and have observed with our knowledge of the VBMS program that the Department typically reports these metrics to Congress, the White House, and the media. We also corroborated this VA provided information through interviews with VBA and contractor personnel. As a result of not following this requirement, there is no assurance that the numbers used in this report obtained from computer-based systems are valid or reliable.

Appendix A Acting Under Secretary for Benefits Comments

Department of Veterans Affairs

Memorandum

Date: November 9, 2015

From: Acting Under Secretary for Benefits (20)

Subj: OIG Draft Report - Review of Alleged Problems with Veterans Benefits Management System and Claims Processing - VAIQ 7645193

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

1. Attached is VBA's response to the OIG draft report: Review of Alleged Problems with Veterans Benefits Management System and Claims Processing.
2. Questions may be referred to Margaret Oberlander, Program Analyst, at 461-9271.

(original signed by:)

Danny G.I. Pummill

Attachment

The Veterans Benefits Administration provides the following comments:

OIG's finding of a backlog of unprocessed Veteran material resulting from inefficient preparation by VBA and handling of Veteran provided documentation at a contractor facility operated by CACI International Inc. (CACI) is partially correct. Improved document preparation could have accelerated scanning but would not have impacted the overall mail processing time. The 41,900 mail packages identified in OIG's report were not at the scan site; they resided in an electronic mail portal and were online and pending VBA review. Of the 1,600 boxes at the scan site, approximately 40 percent of those had previously been scanned and were awaiting transfer to off-site storage. The remaining boxes were comprised of inactive claims files to supplement fluctuations in shipping and daily incoming active work.

OIG's findings regarding the improperly stored materials are partially correct. These duplicate training materials were duplicates for the purpose of training and image scanning quality improvement. These were not original, hard copy Veteran documents as indicated by OIG. The materials were improperly stored; however, they were stored in a secured facility with stringent physical security controls in place. VBA and the Department of Veterans Affairs' Office of Acquisitions have resolved the storage issue with CACI.

The St. Petersburg Regional Office (RO) follows very specific practices in preparing orderly shipments of mail and files to the scanning vendor. VBA believes that the picture on page three is likely an example of mail that was packaged and diverted to the vendor by the United States Postal Service (USPS). Additionally, this box was brown, and the St. Petersburg Intake Processing Center (IPC) Team uses white boxes for all shipment of mail and files; thus, it is not likely that the box was from the St. Petersburg RO. As VBA did not have an opportunity to review the box, VBA is not able to determine its origin.

There are only two authorized methods to send mail to the contract vendor.

Document Control Sheet (DCS): This method is utilized by ROs to send mail and files to the contractor to be uploaded into the Veterans Benefits Management System (VBMS). Mail is screened, placed under control, and systems updated by the RO IPC. A DCS is assigned to every package of mail or file. A DCS number is used to track the mail or claims file until the file is scanned.

General Correspondence Mail: ROs, including the St. Petersburg RO, had several different post office (PO) boxes when Centralized Mail began in June 2014. One of the PO boxes in St. Petersburg served as the general correspondence box and received the bulk of the mail. In order to separate compensation mail for shipment to the scanning vendor, mail is screened by the RO mailroom, date stamped, rubber banded with the original envelope, and carefully placed in boxes for shipment to the contract vendor. Each box that is shipped is tracked by USPS Priority Mail.

The remaining mail coming to the PO boxes is automatically routed to the scanning vendor. This means the mail never arrives at the RO, but instead is sent directly to the contractor. This is part of the contract secured for Centralized Mail between VBA and USPS.

VBA concurs with the recommendations in the draft report. At the present time, both have been resolved. The St. Petersburg RO is processing their mail within eight calendar days and have fewer than 6,500 mail packages pending. The RO has reduced its overall average days pending for rating claims from 252 days in January 2013 to 92.3 days as of October 26, 2015.

VBA provides the following technical comments:

Page 1, paragraph 3:

"We substantiated the allegation regarding a significant backlog of unprocessed veteran material resulting from inefficient preparation and handling of veteran provided documentation at a contractor facility operated by CACI. Specifically, according to VBA personnel and our observation of VBA portal metrics, the St. Petersburg VARO had more than 41,900 mail packages of veterans' claims material that were backlogged and over 1,600 boxes awaiting processing at the CACI scanning facility."

VBA Comment: VBA agrees a mail backlog existed; however, it was not due to poor preparation or handling, and the boxes on-site did not affect mail processing time.

As of January 30, 2015, the average time for the scanning vendor to process mail packages was 2.97 days, and the St. Petersburg RO average processing time for mail after scanning was 23 days. Even if the time to scan and upload mail to the online system had been reduced, the actual processing time would not have been affected.

Further, approximately 40 percent of the 1,600 boxes at the scanning site had already been scanned and were awaiting shipment to off-site storage, which did not impact pending claims. The remaining boxes comprised the daily incoming active workload and inactive claims files to supplement shipping fluctuations. These inactive materials were being scanned and directly uploaded to VBMS to enable VBA to free up space at ROs in support of long-term plans to reduce square footage of rented space. Boxes of inactive materials are processed after active claims, and are not included in the five-day scanning requirement, as they do not impact VBA's ability to process claims. They are stored on-site to ensure a consistent work flow for scanning site staff as well as to reduce operational costs for the government and taxpayer.

Finally, while there was a large volume of mail packages online in the electronic mail portal awaiting review, many of these mail packages were inactive mail, such as file copies of outbound letters, which did not impact claims processing.

Page 4, paragraph 2:

"During our site visit, we also observed a significant amount [of] VA hardcopy claims material, including personally identifiable and health information, improperly stored at the CACI scanning facility. VA's Handbook 6500, VA Information Security Program, requires that contractors adequately protect the confidentiality, integrity, and availability of sensitive information processed, stored, and transmitted. Despite VA's information security requirements, in the contractor facility's rear storage areas, we observed a large amount of hard copy sensitive veteran information haphazardly commingled with contractor company documentation, excess office furniture, and empty computer boxes that appeared to be trash. The image in Figure 2 on the next page demonstrates the extent of improperly stored and commingled veteran information at the contractor site."

Page 5, paragraph 1:

"The improper storage of veteran information occurred because VA did not provide effective oversight of contractor personnel to ensure the effective safeguarding of veteran information at the contractor facility. Without implementing effective controls for storing and safeguarding sensitive VA information, hard copy veterans' claims evidence is potentially vulnerable to loss, theft, and misuse to include identity theft or fraud."

VBA Comment: VBA agrees these materials were stored improperly by CACI; however, we do not agree with the implied impact on claims operations, or that these materials were unsecure. The rear storage area identified in Figure 2 contained documents that were locally-produced by the vendor for the purpose of training and image scanning quality improvement, to conform to VBA's image quality requirements. At no time did this storage area contain original, hard copy materials, and controls were in place to prevent improper removal.

Specifically, all contract personnel and source materials remain under constant video surveillance and all external building access points are monitored by video surveillance and secured by card readers to ensure only those staff cleared by the VA Security Office have access. To augment these security controls, contract personnel are not permitted to take VA material outside of the secured facility at any time, nor are they allowed access to cell phones or recording devices/video cameras within the production environment.

Furthermore, VBA maintains a third-party Independent Verification and Validation vendor which has review teams embedded within each of the scanning facilities. VBA has also instituted scheduled and unscheduled site visits and stationed government personnel at the Centralized Mail scanning facilities.

**Veterans Benefits Administration (VBA)
Comments on OIG Draft Report
“Review of Alleged Problems with Veterans Benefits Management System and Claims Processing”**

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

Recommendation 1: We recommended the Under Secretary for Benefits ensure that the St. Petersburg VA Regional Office is consistently organizing and mailing hard copy veteran material to contractor scanning facilities and hold the Regional Office Director accountable for compliance.

VBA Response: Concur. Since the inception of the scanning initiative, VBA has outlined and maintained detailed shipping instructions for all VA Regional Offices (ROs), including St. Petersburg. Source materials received at the CACI International Inc. (CACI) scanning facility are monitored on a daily basis, and direct feedback is provided to RO personnel on items received which do not conform to established protocols. As of October 26, 2015, the St. Petersburg RO is processing mail in 8.1 calendar days, with 6,421 packages pending. VBA considers this a working inventory based on current production methods. Upcoming enhancements to automate claims establishment and evidence mail handling should reduce this volume further without the need to divert claims processing staff to mail management.

To illustrate the improvement, the following table is an excerpt of mail package volume from January 2015, which identifies the number of pending mail packages in the St. Petersburg RO mail portal queue and the corresponding averages for RO personnel to complete all processing actions. By the end of January 2015, RO personnel reduced the number of mail packages from over 40,000 to 15,932 and reduced the average amount of time to complete processing actions from over 30 to 15.36 days. This improvement reflects the improved mail management practices implemented by the St. Petersburg RO even prior to the OIG assessment.

Date	Mail Packets Pending RO Action	Average Turnaround Time (Days)
01/20/2015	27,249	23.09
01/21/2015	26,273	21.95
01/22/2015	25,468	19.51
01/23/2015	23,774	19.42
01/24/2015	22,850	19.13
01/25/2015	22,715	16.80
01/26/2015	21,283	20.40
01/27/2015	19,309	17.80
01/28/2015	17,720	17.53
01/29/2015	16,102	16.61
01/30/2015	15,932	15.36

VBA requests closure of this recommendation.

Recommendation 2: We recommended the Under Secretary for Benefits initiate onsite reviews of the CACI contractor scanning facilities to ensure the timely processing and the proper storage of VA sensitive information at those facilities.

VBA Response: Concur. VBA maintains a presence at each scanning facility by leveraging various resources to ensure contractual requirements are attained, including an independent verification contractor and a dedicated Contracting Officer’s Representative, who make scheduled and

unscheduled visits. In March 2015, as a result of OIG's findings and other VBA observations, VBA increased the number of visits, provided more detailed instructions for site audits, and authorized an on-site government staff member for each mail intake site.

VBA requests closure of this recommendation.

Appendix B **OIG Contact and Staff Acknowledgments**

OIG Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
Acknowledgments	Michael Bowman, Director William Hill Ryan Nelson

Appendix C Report Distribution

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