



Office of Inspector General

REVIEW OF VETERANS BENEFITS ADMINISTRATION'S PROCEDURES TO PREVENT DUAL COMPENSATION

*Procedures to Prevent
Dual Compensation Need
to Be Improved.*

Report No. 7R1-B01-089
Date: May 15, 1997

Office of Inspector General
Washington DC 20420



DEPARTMENT OF VETERANS AFFAIRS
Office of Inspector General
Washington DC 20420

Memorandum to the Acting Under Secretary for Benefits (20)

**Review of Veterans Benefits Administration's Procedures to Prevent
Dual Compensation**

1. The purpose of our review was to determine whether Veterans Benefits Administration's (VBA) procedures ensured that the disability compensation benefits of active military reservists were properly offset from their training and drill pay. During April 1996, the Office of Inspector General Hotline and Special Inquiries Division had substantiated a complaint from a beneficiary whose disability compensation benefit had not been properly offset for several years. Accordingly, to determine whether this was a systemic problem, we initiated a nationwide review.
2. United States Code (USC), Titles 10 and 38 bar concurrent payments of Department of Defense (DOD) active duty reserve training pay and Department of Veterans Affairs (VA) disability compensation benefits. Receipt of concurrent payments is considered to be dual compensation. Veterans wishing to retain their reserve training pay, which is generally a greater benefit, must request a waiver of VA benefits.
3. We conducted a nationwide review of VA disability compensation beneficiaries who, as of June 30, 1996, were also identified by VA as active reservists. Based on a statistical sample, we found that 90 percent of the potential dual compensation cases reviewed had not had their VA disability compensation offset from their military reserve pay. We estimated that dual compensation payments of \$21 million were made between fiscal years (FYs) 1993 and 1995. Further, if this condition is not corrected, estimated annual dual compensation payments of \$8 million will continue to be made.
4. Dual compensation payments have occurred since at least FY 1993 because procedures established between VA and DOD were not effective or were not fully implemented. In FY 1992, VBA and DOD initiated a Memorandum of Understanding (MOU) to identify reservists receiving disability compensation benefits by matching VBA disability compensation payment records with DOD reserve pay records. The matching agreement did not work as well as initially planned. VBA had not been satisfied with the accuracy of data supplied by DOD and was working with DOD to revise the MOU. However, the MOU expired on June 30, 1994, before it could be revised. During our review, VBA and DOD had begun negotiating a new MOU in August 1996, to renew efforts to prevent dual compensation in future years. However, without the automated match of VA and DOD

records, it is unlikely that dual compensation payments will be prevented because very few beneficiary reservists voluntarily request waivers of their disability compensation benefits.

5. We concluded that improved procedures and communication among VBA, DOD, and veterans are needed to prevent payment of dual compensation to disability compensation beneficiaries who are active reservists. Negotiating a new matching agreement with DOD is a much needed step. This agreement should include mechanisms whereby VBA would solicit waivers from those beneficiaries who had not submitted one, as well as to inform DOD and beneficiaries, that waivers had not been received and reserve pay would need to be offset. Since few beneficiaries had voluntarily submitted waivers to VBA to prevent dual compensation, VBA and DOD need to better inform beneficiaries of their responsibility to prevent dual compensation. In addition, VBA and DOD need to follow up on FYs 1993 through 1996 dual compensation cases. It will be possible to follow up on these cases as the Defense Management Data Center (DMDC), which coordinated the match for DOD, informed us that the match results can be reconstructed. This follow up review is necessary to stop the erroneous payment of significant amounts of money and to recover amounts improperly paid, as well as to comply with the statutory requirements of USC, Titles 10 and 38.

6. We recommended that you take action to prevent dual compensation by negotiating a matching agreement with DOD, taking corrective action on FYs 1993 through 1996 dual compensation cases, and working with DOD and veterans service organizations to improve communication with beneficiaries regarding their responsibility to prevent dual compensation.

7. You concurred with the findings, recommendations, and estimated monetary benefits. You also provided an acceptable implementation plan and we consider all issues resolved. However, we will follow up on the implementation of planned corrective actions.

For the Assistant Inspector General for Auditing,

(Original signed by:)

THOMAS L. CARGILL, JR.

Director, Bedford Audit Operations Division

TABLE OF CONTENTS

	<u>Page</u>
Memorandum to the Acting Under Secretary for Benefits (20)	i
RESULTS AND RECOMMENDATION	
Procedures to Prevent Dual Compensation Need to Be Improved	1
Conclusion	3
Recommendation	4
APPENDIXES	
I BACKGROUND	5
II OBJECTIVE, SCOPE AND METHODOLOGY	7
III DETAILS OF REVIEW - Sampling Plan and Results	9
IV CALCULATION OF MONETARY IMPACT	10
V MONETARY IMPACT IN ACCORDANCE WITH IG ACT AMENDMENTS	11
VI ACTING UNDER SECRETARY FOR BENEFITS' COMMENTS	12
VII FINAL REPORT DISTRIBUTION	14

RESULTS AND RECOMMENDATION

Procedures to Prevent Dual Compensation Need to Be Improved

United States Code (USC), Titles 10 and 38 bar concurrent payments of Department of Defense (DOD) active duty reservist training pay and Department of Veterans Affairs (VA) disability compensation benefits. Receipt of concurrent payments is considered to be dual compensation. We conducted a nationwide review of VA compensation beneficiaries who, as of June 30, 1996, were also identified by VA as active reservists. Based on a statistical sample, we found that 90 percent of the potential dual compensation cases reviewed had not had their VA compensation offset from their military reserve pay. Dual compensation payments have occurred since at least fiscal year (FY) 1993 because procedures established between VA and DOD were not effective or were not fully implemented. Additionally, beneficiaries who received dual compensation had not waived disability compensation benefits in lieu of reserve pay. We estimated that dual compensation payments of \$21 million were made between FYs 1993 and 1995. Further, if this condition is not corrected, estimated annual dual compensation payments of \$8 million will continue to be made.

Reservist Waiver Cases Had Not Been Properly Processed Since at Least FY 1993

VA Regional Office (VARO) staff cannot process disability compensation benefit offsets until beneficiaries waive VA benefits to receive active reservist pay. We reviewed a nationwide statistical sample of 162 of 28,537 disability compensation beneficiaries shown as active reservists on Veterans Benefits Administration's (VBA's) June 30, 1996, automated compensation records. We reviewed waivers and offsets for the period FYs 1993 through 1995. Our review showed waivers and resulting offsets had not been properly processed in 145 cases (90 percent). *(See Appendix III on page 9 for a description of our sampling plan and results.)* In 40 of the 145 exception cases, offsets had been processed for FY 1993, but not for FYs 1994 or 1995. In the remaining 105 exception cases, neither waivers were received nor offsets processed for any of the 3 years. As a result, we estimated that \$21 million in dual compensation payments were made between FYs 1993 and 1995. Further, if this condition is not corrected, we estimate that erroneous annual dual compensation payments of \$8 million will continue to be made. *(See Appendix IV on page 10 for calculation of monetary impact.)*

In our opinion, dual compensation payments represent VA compensation overpayments because both VA and DOD officials informed us that, given the option, nearly all beneficiaries will elect to waive their disability compensation benefit in order to receive higher reservist training pay. To illustrate the difference in rates, about 62 percent of our sampled beneficiaries received 10 percent disability compensation at a daily rate of about \$3. The military grade of E4, which nearly all dual compensation beneficiaries would exceed, receives a daily rate of about \$36.

Dual Compensation Payments Resulted From Inadequate Procedures and Breakdowns in Communication Among VBA, DOD, and Beneficiaries

In an effort to enhance the prevention of dual compensation, VBA and DOD entered into a Memorandum of Understanding (MOU), on July 21, 1992, which provided procedures to identify VA disability compensation beneficiaries who also were active reservists. The MOU established that a computer match between VA compensation pay records and DOD reserve pay records would be conducted annually. VBA was to provide the Defense Management Data Center (DMDC) with a file of all VA disability compensation recipients. The DMDC was to match this file with its reserve pay file and return the matched data to VBA. VBA was to make the necessary disability compensation offsets and then notify DOD of reservists whose disability compensation had been offset. However, we found that procedural and communication problems existed from the initiation of the MOU in FY 1992. As a result, the computer match established by the MOU never worked as intended.

VBA Did Not Solicit Waivers of Disability Compensation From Active Reservists Beneficiaries

VBA's policy stated that it was DOD's responsibility to obtain waivers from veterans and forward them to VBA. Therefore, VBA made no attempt to obtain waivers from veterans. Our review showed that in 65 percent of the cases we analyzed, benefit offsets were not completed because the veteran had not submitted a waiver. It is the veterans' responsibility to inform VA when they are in receipt of active reservist pay. Veterans are informed of this responsibility at the time they are awarded disability compensation, and according to DMDC officials, when they enlist in the active reserves.

VBA Did Not Inform DOD of Those Beneficiaries Who Had Not Submitted Waivers

The MOU contained no formal procedure for VBA to inform DOD of those veterans who had their disability compensation offset or who had not submitted waivers. VBA officials informed us that they had believed DOD would be aware of the veterans who had not submitted waivers by a file provided the DMDC by the VA Benefits Delivery Center (BDC) each year. DMDC officials informed us that they had never been notified as to which veterans had submitted waivers and been offset, and which had not. Therefore, DMDC had not informed military finance centers of which beneficiaries' reservist pay needed to be offset to prevent dual compensation. BDC officials believed this notification was to have been part of the original automated match, but that it had not been implemented, probably due to the fact DMDC and VBA had not agreed upon a format for the collection of data.

VBA and DOD Allowed the MOU and Computer Match to Expire

On June 30, 1994, the MOU that had established the computer match expired. VBA had not been satisfied with the accuracy of data supplied by DOD and was working with DOD to revise the MOU.¹ However, the MOU expired before it was revised. During our review we noted that in August 1996, VBA and DOD had begun negotiating a new MOU. This new MOU should address prevention of dual compensation in future years. However, without the match, it is unlikely that dual compensation payments will be prevented. As noted above, we found that offsets for FYs 1994 and 1995 training had been completed in only about 10 percent of cases reviewed.

Pending negotiation of a new MOU, in November 1996, DOD provided VBA with an automated file of all FY 1996 active reservists. To meet Privacy Act restrictions, this data was provided with the understanding that VBA could solicit a waiver of disability compensation benefits from the beneficiaries, but could take no follow up action if the beneficiaries did not respond. In addition, VBA had no plans to inform DOD of which beneficiaries had submitted waivers and had their benefits offset, and which had not. As a result, DOD again would not have the information necessary to take action to offset reserve pay for those reservists who had not requested a waiver of VA disability compensation benefits.

Conclusion

We concluded that improved procedures and better communication among VBA, DOD and veterans are needed to prevent payment of dual compensation. Negotiating a new matching agreement with DOD is a much needed step. The interim data DOD provided for FY 1996 is a good start, but it does not negate the need for a formal MOU and computer matching agreement. This MOU should include agreed upon mechanisms whereby VBA would solicit waivers from those beneficiaries who had not submitted one, as well as to inform DOD and beneficiaries, that waivers had not been received and reserve pay would need to be offset. Since few beneficiaries had voluntarily submitted waivers to VBA to prevent dual compensation, VBA and DOD need to better inform beneficiaries of their responsibility to prevent dual compensation. In addition, VBA and DOD need to follow up on FYs 1993 through 1996 dual compensation cases. It will be possible to follow up on these cases as the DMDC informed us that the match results can be reconstructed. This follow up review may involve a substantial effort, but it is necessary to stop the erroneous payment of significant amounts of money and to recover amounts improperly paid as well as to comply with the statutory requirements of USC, Titles 10 and 38.

Recommendation

¹ The results of our review indicated that the data for at least the FY 1993 match was probably not accurate. We noted a majority of cases that were matched in FY 1993 showed significantly lower days of training than had been submitted for the same beneficiaries in FY 1992. Discussions with DMDC and BDC officials indicated this may have been due to the format of DMDC's reservist pay records used in the match.

The Acting Under Secretary for Benefits should take action to prevent dual compensation by:

- a. Negotiating a matching agreement with DOD that includes provisions for VBA to solicit waivers from beneficiaries who have not submitted waivers and a formal mechanism for informing DOD of beneficiaries requiring reservist pay offset.
- b. Following up on FYs 1993 through 1996 dual compensation cases to ensure either VBA disability payments are offset or DOD is informed of the need to offset reservist pay.
- c. Working with DOD and veterans service organizations to improve communication with beneficiaries regarding their responsibilities to prevent dual compensation.

Monetary impact associated with the recommendation is shown in Appendix V on page 11.

Acting Under Secretary for Benefits Comments

The Acting Under Secretary for Benefits concurred with the findings, recommendations, and estimated monetary impact.

Implementation Plan

The Acting Under Secretary provided an implementation plan which included estimated target completion dates for negotiating a matching agreement with DOD, following up on FYs 1993 through 1996 dual compensation cases and working with DOD and veterans service organizations to improve communication with beneficiaries regarding their responsibility to prevent dual compensation. *(See Appendix VI on pages 12-13 for the full text of the Acting Under Secretary's comments.)*

Office of Inspector General Comments

The implementation plan is acceptable and we consider all audit issues resolved. However, we will follow up on the implementation of planned corrective actions.

BACKGROUND

As of June 30, 1996, Veterans Benefits Administration's (VBA) records identified 28,537 veterans receiving Department of Veterans Affairs (VA) disability compensation, serving in the active military reserves. United States Code (USC), Titles 10 and 38 bar concurrent payments of active duty reserve training pay and VA disability compensation benefits. Receipt of concurrent payments is considered to be dual compensation. Veterans wishing to retain military pay and allowances for active duty reservist training, which is generally a greater benefit, must complete VA Form (VAF) 21-8951, "Notice of Waiver of VA Compensation or Pension to Receive Military Pay and Allowances." Per an April 1983, Comptroller General's Decision, the Department of Defense (DOD) is responsible for withholding training pay until a waiver is submitted. However, on November 18, 1983, the General Accounting Office (GAO) report, "Dual Compensation Is Paid When Military Reservists Do Not Waive VA Disability Benefits (GAO/HRD-84-13)" recommended, and VA and DOD agreed, that a more effective control over waiver submittals could be achieved by relying on VA rather than military finance centers to identify reservists not submitting waivers. VA also agreed to accept retroactive waivers. In other words, a veteran could submit a waiver of VA benefits for fiscal year (FY) 1992 training in FY 1996.

Prior to FY 1992, disability compensation benefit offsets were processed manually by individual VA Regional Offices (VAROs). Beneficiaries and their reserve unit company commanders would complete VAFs 21-8951 annually and return them to VAROs. However, the November 18, 1983 GAO report claimed about 65 percent of active reservists in receipt of VA disability compensation had failed to submit waivers. To improve controls, VA and DOD agreed to automate the waiver process.

Effective with FY 1992, VA and DOD initiated a Memorandum of Understanding (MOU) computer matching agreement whereby VBA's compensation pay records and DOD's military reserve pay records would be matched, to identify military reservists receiving disability compensation benefits. As a result of the match, VBA was advised of those veterans who had submitted waivers and those who had not. For those who had submitted waivers, VAROs would process benefit offsets reflecting the number of training or drill days for which the beneficiary had received pay during the preceding year. For those beneficiaries who had not submitted waivers, VBA was to inform DOD of the need to offset reservist pay and request a waiver of their VA benefits. Initially, VBA and DOD planned to totally automate the waiver/offset process. A beneficiary could submit a one-time VAF 21-8951 waiver and his or her benefits would be automatically offset to reflect reservist training days. Due to questions on the accuracy of DOD data, this automatic adjustment phase was never implemented. However, VBA and DOD utilized a one-time waiver through FY 1994.

In addition to the legal bar to dual compensation, VA also justified the FY 1992 MOU on the basis that if the operation was not automated, and full reliance was placed solely on manual actions, the cost of processing the adjustments would be prohibitive and all dual compensation payments would not be detected. The VA expected to save approximately \$13 million in VA disability compensation benefits not paid over the life of the computer matching agreement. The computer matching agreement was to expire 18 months after its effective date of January 1, 1993, and could be renewed for another 12 months. DOD did not expect any savings as a result of this computer matching agreement. The individual reservist would save the difference between the higher reserve pay and the lower VA disability compensation that is collected.

VA and DOD completed two computer matches from the FY 1992 MOU that effected VA disability compensation benefits for FYs 1992 and 1993.

OBJECTIVE, SCOPE AND METHODOLOGY

Objective

The purpose of the review was to determine whether Veterans Benefits Administration's (VBA) procedures ensured that the disability compensation benefits of active military reservists were properly offset from their training and drill pay. During April 1996, the Office of Inspector General Hotline and Special Inquires Division had substantiated a complaint from a beneficiary that the beneficiary's disability compensation benefit had not been properly offset, to reflect reservist training, in several years. This complainant had notified the Department of Veterans Affairs (VA) of possible dual compensation, but corrective action had not been taken. Accordingly, we initiated a nationwide review to determine whether this was a systemic problem.

Scope and Methodology

To determine whether VBA had a systemic problem regarding the offset of active military reservist training and drill pay, the review focused on a population of 28,537 disability compensation beneficiaries identified as active reservists on VBA's June 30, 1996, automated compensation and pension (C&P) file.

We statistically sampled 162 of the 28,537 disability compensation beneficiaries. For each sampled case, we analyzed the automated C&P records to determine whether waivers and offsets of disability compensation benefits had been properly processed for the fiscal years (FYs) 1993 through 1995. Our case analyses were forwarded to the responsible VA Regional Offices (VAROs), for their review and comments. We selected a 3-year period because the hotline complainant had alleged his or her disability compensation benefits had not been offset for several years. When we initiated our review, FY 1995 was the most current year for which benefit offsets would have been completed. In addition to our statistical sample, we also:

- Conducted an on-site review at one VARO.
- Reviewed written responses to our case analyses from the responsible VAROs.
- Reviewed a FY 1992 Memorandum of Understanding between the VA and Department of Defense (DOD) and all corresponding documentation.
- Discussed dual compensation with VBA's Central Office and Benefits Delivery Center management and staff, as well as with DOD officials.

- Verified that VBA had properly offset the hotline complainant's disability compensation for all years.
- Discussed our review process, findings, and proposed recommendation at various stages of the review with VBA program officials.

The review was conducted in accordance with government auditing standards for qualifications, independence, due professional care and included such tests of procedures and records as we considered necessary under the circumstances.

DETAILS OF REVIEW

Sampling Plan and Results

Review Universe

We analyzed the Veterans Benefits Administration's (VBA) June 30, 1996, automated compensation and pension (C&P) file to determine the number of active reservists receiving Department of Veterans Affairs (VA) disability compensation benefits. We extracted all records where the Active Reservist field indicated the beneficiary was a reservist. The extracted population totaled 28,537 disability compensation beneficiaries identified as active reservists as of June 30, 1996. In 17,265 (61 percent) of the 28,537 cases, the beneficiaries were in receipt of 10 percent disability compensation, 5,533 (19 percent) were in receipt of 20 percent disability compensation, and 5,739 (20 percent) beneficiaries were in receipt of at least 30 percent disability compensation.

Sample Design

The sample included 162 randomly selected cases of the 28,537 active reservist beneficiaries and was based on a non-stratified attribute sampling design at the 95 percent confidence level. We validated the active reservist status for the sampled cases by verifying the information using the Benefits Delivery Network and VA Regional Office review comments. We did not independently validate that the beneficiaries within the population tested comprised the total universe. However, nothing came to our attention that would lead us to believe that beneficiaries were missing from our universe.

Sampling Results

We found waivers and offsets had not been properly processed in 145 (90 percent) of the 162 cases reviewed. In 40 of the 145 exception cases, offsets had been properly processed for fiscal year (FY) 1993, but no offsets were processed for FYs 1994 and 1995. In the remaining 105 exception cases, offsets had not been processed for any of the 3 years reviewed.

Category of Dual Compensation	Estimated Rate of Occurrence	Confidence Interval	Estimated Number of Dual Compensation Payments in the Population
C&P beneficiaries in receipt of Dual Compensation.	90 %	+/- 5.0 %	25,683
Occurrence rate in 28,537 case population.		+/- 1,427 cases	

CALCULATION OF MONETARY IMPACT

	<u>Projected 3-Year Dual Compensation Payments</u>	<u>Projected Annual Dual Compensation Payments</u>
Compensation Payments That Should Be Offset		
<ul style="list-style-type: none"> In 145 (90 percent) of the 162 cases reviewed, disability compensation payments were not properly offset. The 145 dual compensation payments that were paid totaled \$118,636, with an average offset of about \$818 (\$118,636/145). To determine the average offset, we used the 60-day (2 months) average annual offset figure developed by the Department of Defense when negotiating the fiscal year (FY) 1992 Memorandum of Understanding with the Department of Veterans Affairs (VA). For each case we multiplied the average annual offset figure times the appropriate rate for the beneficiaries' degree of VA disability (e.g., 2 months x \$85 [monthly FY 1993 rate for a 10 percent beneficiary] = \$170). Based on our sample results, we estimate that during FYs 1993 through 1995, dual compensation payments were made to 25,683 beneficiaries (28,537 x 90 percent), resulting in \$21 million in dual compensation payments (25,683 x \$818 average amount not offset). 	\$21,008,694	
<ul style="list-style-type: none"> In 17 (10 percent) of the 162 cases reviewed, disability compensation payments were properly offset. In an additional 9 cases (6 percent), VA Regional Office comments indicated beneficiaries were no longer active reservists. Therefore, based on our sample results, we estimate that 23,971 beneficiaries (28,537 x 84 percent) will continue to receive \$8 million (23,971 x \$336 {average amount of FY 1997 benefit not offset}) in dual compensation benefits annually. 		\$8,054,256

MONETARY IMPACT IN ACCORDANCE WITH IG ACT AMENDMENTS

REPORT TITLE: **Review of Veterans Benefits Administration's
Procedures to Prevent Dual Compensation**

PROJECT NUMBER: 7R1-004

<u>Recommendation</u>	<u>Category / Explanation of Benefits</u>	<u>Recommended Better Use of Funds</u>
a, c	<u>Recommended Better Use of Funds.</u> --Negotiating a matching agreement with Department of Defense (DOD) that includes provisions for Veterans Benefits Administration (VBA) to solicit waivers from beneficiaries identified as not having submitted them and a formal mechanism for informing DOD of beneficiaries requiring reservist pay offset, would prevent future dual compensation payments in an estimated 23,971 cases annually. --Working with DOD and veterans service organizations to improve communication with beneficiaries regarding their responsibilities to prevent dual compensation.	\$8,054,256
b	<u>Recommended Better Use of Funds.</u> Follow up on fiscal years 1993 through 1995 dual compensation cases to ensure either VBA disability payments are offset or DOD is informed of the need to offset reservist pay.	\$21,008,694 <u>\$29,062,950</u>

MEMORANDUM FROM THE ACTING UNDER SECRETARY
FOR BENEFITS, DATED MAY 9, 1997

**Department of
Veterans Affairs**

Memorandum

Date: May 9, 1997
From: Acting Under Secretary for Benefits (213)
Subj: Draft Report, Review of VBA's Procedures to Prevent Dual Compensation
To: Assistant Inspector General for Auditing (52)

1. This is in response to your Memorandum of March 24, 1997, concerning the OIG draft report entitled Review of Veterans Benefits Administration Procedures to Prevent Dual Compensation.
2. We agree that VA should negotiate a matching agreement with DOD that includes provisions for VBA to solicit waivers from beneficiaries who have not submitted waivers. We E-mailed a draft copy of such a matching agreement to DMDC for informal review on April 3, 1997. The draft matching agreement provides that VA will make all adjustments except in the rare case where a veteran specifically waives military pay and allowances to receive VA compensation. In those cases, the matching agreement provides that VA will forward the waiver to DMDC. If the veteran does not explicitly waive either VA compensation or military pay and allowances, VA will withhold the veteran's compensation for the number of drill days reported by DMDC (after furnishing predetermination notice).
3. We will follow up on fiscal year 1993 through 1996 dual compensation cases to ensure that VA compensation payments are offset or that the member waives military pay and allowances for the appropriate number of drill days.
4. We do not object to working with DOD and veterans service organizations to improve communication with beneficiaries regarding their responsibilities to prevent dual compensation and we will include a paragraph reminding veterans of their responsibilities to prevent dual compensation in our letters proposing to reduce compensation because of drill pay. However, we believe that any system that relies on members to report their drill days is bound to fail. That is why we are proposing a system that relies on members to report their drill days is bound to fail. That is why we are proposing a system where VA will get the number of drill days from DMDC, advise the veteran that we propose to withhold that many days, and make the withholding (in the absence of evidence from the veteran that DMDC's information is wrong).
5. Implementation of the OIG recommendations requires approval of a computer matching agreement between VA and DOD. Since this matching agreement must be approved by both agencies' General Counsels and Data Integrity Boards, it is impossible at this point to furnish a realistic target completion date. However, VBA's implementation plan with respect to all recommendations is as follows: The Compensation and Pension Service will send forward for formal concurrence within VBA a matching agreement with DMDC within 30 days of the date DMDC indicates informal concurrence in the draft matching agreement. Within 60 days of the date the matching agreement is approved by VA and DOD Data Integrity Boards the

MEMORANDUM FROM THE ACTING UNDER SECRETARY
FOR BENEFITS (cont.)

2.

Assistant Inspector General for Auditing (52)

Compensation and Pension Service will prepare a memorandum requesting a Project Initiation Request to make the necessary system changes to support the matching agreement and will prepare the necessary changes to the procedural manual, M21-1.

6. We have no information about the estimated dollar impact of the OIG's findings. Therefore, we agree with the estimated dollar impact.

(Original signed by David A. Brigham for:)
Stephen L. Lemons

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