



Department of Veterans Affairs Office of Inspector General

Combined Assessment Program Review of the VA Regional Office New Orleans, Louisiana

Office of Inspector General Combined Assessment Program Reviews

Combined Assessment Program (CAP) reviews are part of the Office of Inspector General's (OIG's) efforts to ensure that high quality health care and benefits services are provided to our Nation's veterans. CAP reviews combine the knowledge and skills of the OIG's Offices of Healthcare Inspections, Audit, and Investigations to provide collaborative assessments of VA medical facilities and regional offices on a cyclical basis. The purposes of CAP reviews are to:

- Evaluate how well VA facilities are accomplishing their missions of providing veterans convenient access to high quality medical and benefits services.
- Determine if management controls ensure compliance with regulations and agency policies, assist management in achieving program goals, and minimize vulnerability to fraud, waste, and abuse.
- Conduct fraud and integrity awareness training for facility staff.

In addition to this typical coverage, CAP reviews may examine issues or allegations referred by VA employees, patients, Members of Congress, or others.

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Executive Summary

The Office of Inspector General (OIG) conducted a Combined Assessment Program (CAP) review of the Department of Veterans Affairs Regional Office (VARO) New Orleans, Louisiana, from July 23 through July 27, 2001. The purpose of the CAP review was to evaluate claims processing and administrative operations. During the review, we also provided fraud and integrity awareness briefings to 62 VARO employees.

VARO financial and administrative activities were generally operating effectively. These activities included VARO management operations; Systematic Analyses of Operations (SAOs); monitoring of the Systematic Technical Accuracy Review (STAR) results; ethics training; monitoring of the Decision Review Officer (DRO) Program; fiduciary initial appointments, field examinations and accountings; electronic data room safeguards and internet security; and timeliness and accuracy of Vocational Rehabilitation and Employment (VR&E) claims processing.

VARO New Orleans ranks second in the nation for timeliness of completed compensation and pension (C&P) claims with rating related actions, and fourth for completed claims without rating actions. The regional office's June 2001 Balanced Scorecard (BSC) showed that it took VARO New Orleans less time to process C&P claims and resolve appeals than both the national average and the Fiscal Year (FY) 2001 National Target set by VBA. Fiduciary activities were also better than the national average for timeliness of initial appointments and field examinations, and met the FY 2001 National Target. While June 2001 BSC data showed VR&E claims processing took longer than the national average and did not meet the FY 2001 National Target for days to notify veterans whether they were entitled to program benefits, the July data showed the VARO met the FY 2001 National Target and were below the national average. Comparative BSC results for June 2000 and June 2001 are shown in *Appendix III*.

We identified opportunities for management to improve operations and made recommendations in the following program activities:

- Continuity of Operations Planning and safeguarding veterans' records.
- Timeliness and accuracy of C&P claims processing and adjustments.
- Benefits debt prevention procedures.
- Security of veterans' records, automated information systems (AIS), and the Benefits Delivery Network (BDN).

We also identified other areas that warrant management attention. We discussed each of these additional issues with the VARO Director and he agreed to address each issue.

The Regional Office Director concurred with the findings and recommendations and provided acceptable implementation plans. Therefore, we consider the issues to be resolved. However, we may follow up on those planned actions that are not completed.

(original signed by:)
RICHARD J. GRIFFIN
Inspector General

Introduction

Facility Profile

VARO New Orleans provides C&P and VR&E services to eligible veterans, dependents, and survivors residing in Louisiana. The regional office has a Loan Guaranty Division consisting of Construction and Valuation and Property Management sections. The processing, guaranteeing, and servicing of VA loans for the State of Louisiana have been consolidated into the Regional Loan Center in Houston, Texas. Education services are provided by VARO Atlanta.

General operating expenses for FY 2001 totaled about \$11.5 million and the regional office had an authorized staffing level of 197 full-time equivalent employees. The regional office has itinerant Veteran Benefits Counselors in Louisiana at VA Medical Centers (VAMCs) New Orleans, Alexandria, and Shreveport, offering claims assistance to hospitalized veterans.

Louisiana currently has a veteran population of about 392,000. In FY 2000, VARO New Orleans served 230,802 veterans, which is an increase of 33,225 veterans since FY 1999. The number of C&P benefit claims processed increased from 47,362 to 51,512 during the same period. During FY 2000, almost \$295 million in C&P benefits were paid to approximately 60,300 beneficiaries. VR&E services were provided to about 1,900 veterans, service persons, dependents, and survivors with estimated benefits totaling over \$31 million in FY 2000.

Objectives and Scope of CAP Review

Objectives: The objectives of the CAP review were to evaluate a range of claims processing and administrative operations and to provide fraud and integrity awareness training to VARO New Orleans employees.

Scope: We reviewed selected VARO operations, focusing on the efficiency, effectiveness, quality, and timeliness of the benefits delivery system and the associated management controls. These controls are the policies, procedures, and information systems used to administer Veterans Benefits Administration (VBA) benefit programs, safeguard assets, prevent and detect errors and fraud, and to ensure that organizational goals and objectives are met. The review covered the following benefit delivery and administrative activities and controls:

BDN Security
AIS Security
Retroactive Benefit Payments
Fiduciary and Field Examinations
VARO Management Operations

C&P Claims Processing
C&P Overpayments
VR&E Claims Processing
Hospital Adjustments
Claims Record Security

The CAP team performed the following activities while onsite:

- Visually inspected the facility's physical space and equipment.
- Reviewed 199 C&P, 20 fiduciary, and 30 VR&E files.
- Interviewed VARO management, line managers, and selected program staff in the administrative and benefit delivery areas of operation.
- Reviewed management information and data related to the timeliness and quality of service to veterans.
- Reviewed management controls and quality of service provided to veterans by the Veterans Service Center (VSC), VR&E, and Information Resources Management (IRM).
- Met with representatives of the five Veteran Service Organizations located at the VARO to discuss the timeliness and quality of service to veterans.
- Conducted 4 fraud and integrity awareness briefings, attended by 62 VARO staff from all services. Each briefing included a short film presentation, and a question and answer period.

The review was performed in accordance with the Combined Assessment Program Standard Operating Procedures, issued by the Department of Veterans Affairs' Office of Inspector General. The review covered the period of June 1999 through June 2001.

Results and Recommendations

Issues Requiring Corrective Actions

VARO Management

Management has the opportunity to improve the VARO's Continuity of Operations Plan and better safeguard veterans' records.

Conditions Identified

The facility Continuity of Operations Plan (COOP) should include emergency provisions for veterans' records located on the first floor of the VARO's leased space. The VARO relocated a VSC team to the first floor over 2 years ago due to space constraints in its area on the fifth floor. At the same time, 120 file cabinets containing veterans' C&P claims folders were relocated to the first floor with the VSC team. One hundred and eighteen of these file cabinets contained active C&P claims folders. There were also 31 file cabinets containing VR&E veterans' records in this same area. However, no long-term plan had been developed to move these records to safety in case of a hurricane or other disaster.

According to VARO staff, a Table Top exercise (management meetings to discuss potential disasters that could occur, and possible disaster recovery plans) was conducted in December 2000 to test the station's COOP, and provisions for safeguarding the files on the first floor in an emergency were extensively discussed. However, no emergency plan was developed for the veterans' records, and the results of the Table Top exercise were not documented.

Although the VARO had not previously experienced flooding from a hurricane, New Orleans is a coastal area especially vulnerable to flood and wind damage. Therefore, these files are more at risk than records located on the fifth floor. Management needs to take action to ensure these records are protected during emergency conditions.

Recommendation 1 – We recommend the VARO Director ensure that:

- a. Emergency provisions are developed and included in the facility COOP for safeguarding the veterans' records on the first floor.
- b. The results of Table Top exercises to test the COOP are documented, including vulnerabilities identified and corrective actions needed.
- c. A follow-up system is developed to ensure that needed corrective actions are taken.

Regional Office Director Comments

The Director concurred with the findings and recommendations. The regional office has contracted to develop a new floor plan for the second floor office space to house all file cabinets presently located on the first floor. In the interim, plans are in place to move all file cabinets from the first floor in an emergency, using contract labor. The upcoming annual Table Top exercise will be documented to include identified vulnerabilities and corrective actions taken, and will be included in the Director's Office diary system to ensure timely completion.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendations and we consider these issues resolved.

Veterans Service Center

The VSC can improve the timeliness and accuracy of C&P claims processing and the security over sensitive claims folders.

Conditions Identified

Improvements can be made in the processing of benefits awards, debt prevention procedures to avoid overpayments, security of veterans' records, processing of system-generated messages, and third-party authorizations of retroactive one-time payments.

Timeliness of Claims Processing

VARO New Orleans ranked near the top in the nation for the timely processing of C&P claims. In June 2001, the VARO processed original rating related actions in 118 days, compared to a national average of 175 days. A review of a random sample of 100 of the 3,925 original and reopened C&P claims completed during October 1, 2000, through February 28, 2001, showed that it took an average of 98.94 days to process these claims. The table at the top of the next page shows the average days to process these claims for each phase of the process. Overall, the time to process these claims ranged from 2 to 439 days.

Average Days to Process the 100 Random Sample Claims

Processing Phase	No. Claims In Phase ²	Average Processing Days	Range ¹ (Min) (Max)	
Date of Claim-CEST ³	96	7.9	1	83
CEST-1st Develop	72	12.5	1	126
Develop-Ready to Rate	71	75.6	1	300
Ready to Rate-Rating	67	25.3	1	143
Rating-Award	71	13.5	1	92
Award-Authorize	91	2.3	1	22
Total		98.94 ⁴	2	439

While the VARO's timeliness was notable compared to other VARO's, additional improvements could be made. Our review of the 100 random sample claims identified 29 claims with avoidable processing delays and/or procedural errors. Eighteen (18 percent) claims had avoidable processing delays, and 14 claims had procedural errors (3 claims had both avoidable days and procedural errors).

The 18 claims with avoidable delays had an average processing time of 205.4 days; more than double that of the 98.94 average days for the 100 claims in our random sample. The table below shows the average days to process the 18 claims for each phase of the process.

**Average Days to Process the 18 Random Sample Claims
With Avoidable Days of Delay⁵**

Processing Phase	No. Claims In Phase ⁷	Average Processing Days	Range ⁶ (Min) (Max)	
Date of Claim-CEST	17	15.8	3	71
CEST-1st Develop	14	23.1	9	96
Develop-Ready to Rate	16	126.8	26	215
Ready to Rate-Rating	13	59.8	2	113
Rating-Award	15	16.7	7	62
Award-Authorize	16	3.1	1	1
Total		205.4 ⁸	45	439

¹ Columns do not add. Represents cumulative range.

² All claims did not go through each processing phase.

³ CEST is a command authority used to establish claims.

⁴ Column does not add. Represents cumulative average (total number of days ÷ cases reviewed).

⁵ Avoidable days of delay presented are those delays of more than 7 days to establish the claim, and more than 30 days for the development, rating, and authorization phases.

⁶ Columns do not add. Represents cumulative range.

⁷ Column does not add. Some claims had delays in more than one phase of the process.

⁸ Column does not add. Represents cumulative average (total number of days ÷ cases reviewed).

Eighteen of 100 (18 percent) claims had avoidable delays in each of the six phases of claims processing, ranging from 1 day to 215 days. According to the VSC Manager, these delays were caused by an increase in workload during the period reviewed resulting from processing cases (brokering work) for other VAROs. Specifically, the review showed:

Avoidable Days of Delay by Processing Phase

Processing Phase	No. Claims In Phase ¹⁰	Total Days of Delay	Average Days of Delay	Range ⁹ (Min) (Max)	
Date of Claim-CEST	6	238	39.7	3	71
CEST-1st Develop	3	127	42.3	9	96
Develop-Ready to Rate	10	745	74.5	26	215
Ready to Rate-Rating	8	472	59.0	2	113
Rating-Award	3	79	26.3	7	62
Award-Authorize	0	0	0.0	1	1
Total		1,661	92.3¹¹	30	279

Fourteen of 100 (14 percent) claims had procedural errors that affected the accuracy of claims processing. According to the VSC Manager, these errors occurred because of the relative inexperience of the Veterans Service Representatives (VSRs) in processing claims. Only 7 of 62 VSRs were journeymen during the period reviewed. However, recently promoted VSRs were being provided ongoing training. Specifically, the review showed:

Procedural Errors

Procedural Error	Claims With Errors	Percent
Incorrect end product	5	36%
Incorrect date of claim	3	21%
End product taken with issues pending	3	21%
Rating required but no rating done	1	7%
End product established at time of award	1	7%
End product not cancelled	1	7%

Recommendation 2 – We recommend the VARO Director ensure that VSR training includes emphasis on timeliness and accuracy of C&P claims processing in the specific areas identified by the OIG review.

⁹ Columns do not add. Represents cumulative range.

¹⁰ Column does not add. Some claims had delays in more than one phase of the process.

¹¹ Column does not add. Represents cumulative average (total number of days ÷ cases reviewed).

Regional Office Director Comments

The Director concurred with the finding and recommendation. The VSC will provide appropriate VSR training on timeliness and accuracy of C&P claims processing.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendation and we consider these issues resolved.

Hospital Adjustments

C&P benefits for veterans hospitalized at government expense were not reduced as required. Overpayments of about \$49,000 were made to 7 of 36 (19 percent) veterans continuously hospitalized at VAMCs¹² in Louisiana for 90 days or more as of June 20, 2001.

- 5 of 36 (14 percent) benefits payments totaling about \$25,000 were not reduced because the VSC did not take proper action when the notifications were received from the VAMCs that the veterans were hospitalized.
- 2 of 36 (6 percent) benefits payments totaling about \$24,000 were not reduced because VAMC Alexandria did not advise the VSC that the veterans were hospitalized.

VSC management agreed to provide refresher training to staff regarding hospital adjustments and to meet with VAMC Alexandria officials regarding notification to the VSC when veterans are hospitalized over 90 days.

Recommendation 3 – We recommend the VARO Director ensure that:

- a. VSC staff receive refresher training on proper adjustments to prevent overpayments.
- b. VSC management meet with appropriate staff at VAMC Alexandria to discuss the VAMC notifying the VSC when veterans are hospitalized 90 days or more.

Regional Office Director Comments

The Director concurred with the findings and recommendations. The VSC will provide refresher training on hospital adjustments to VSC employees, and VSC management will meet with officials from VAMC Alexandria to discuss notification to the VSC when a veteran is hospitalized 90 days or more.

¹² Alexandria, New Orleans, and Shreveport.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendations and we consider these issues resolved.

Locked Files

Controls need to be strengthened over the locked files to ensure that claims folders designated as sensitive (i.e., employees, Veteran Service Officers, relatives, etc.) are appropriately secured. VARO New Orleans is the Office of Jurisdiction for VARO Jackson, Mississippi, and is required to maintain its employee/veteran claims folders in physically locked files.

- 15 of 27 (56 percent) VARO Jackson employee/veteran claims folders were not in locked files at the time of our onsite inventory. This occurred because there was no system to ensure claims folders were returned to the locked files, and/or the folders were not labeled as VA employee files. Therefore, they were returned to the general files, rather than to the locked files. As a result of our review, immediate action was taken to locate the folders so they could be placed in the locked files with employee labels affixed.
- 41 of the 83 (49 percent) claims folders in locked files were not labeled as to why they had been designated as sensitive. Also, the mandatory semiannual reconciliation of electronic and physically locked files had not been performed.

Recommendation 4 – We recommend the VARO Director ensure that:

- a. A control log is used that requires employees to sign out locked files and return them by the close of the same day.
- b. All claims folders in the locked files are appropriately labeled.
- c. The locked files are physically inventoried during the semiannual reconciliation.

Regional Office Director Comments

The Director concurred with the findings and recommendations. The VSC will implement a control log to sign out locked files and have them returned by the close of the same day, all folders in locked files have been appropriately labeled, and semi-annual audits of locked files will be conducted in May and November of each year.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendations and we consider these issues resolved.

System-Generated Messages

C&P awards were not adjusted timely when notifications of changes in entitlement were received by system-generated messages. We found that 12 of 44 (27 percent) system messages generated by the Hines Data Processing Center in January 2001 were not processed timely or correctly.

- 4 of 22 (18 percent) Notice of Benefit Payment Transactions (VAF 20-6560) were not processed in a timely manner. The avoidable days of delay before actions were taken on these notices ranged from 60 to 166 days. One VAF 20-6560 was not in the claims folder and the required action had not been taken.
- 8 of 22 (36 percent) C&P Master Record – Audit Write-Outs (VAF 20-8270) were not processed in a timely manner. The avoidable days of delay before actions were taken on these notices ranged from 20 to 110 days. One VAF 20-8270 had an incorrect action taken when the award was terminated in error, and an inappropriate end product was taken when the award was reinstated.

According to the VSC manager, the deficiencies in timeliness and accuracy of processing system-generated messages occurred because of the relative inexperience of the VSRs in processing these messages, and because of increased workload during that period of time due to processing cases for other VAROs.

Recommendation 5 – We recommend the VARO Director ensure that VSRs receive refresher training on the timely and accurate processing of system-generated messages.

Regional Office Director Comments

The Director concurred with the finding and recommendation. The VSC will provide VSRs with refresher training on timely and accurate processing of system-generated messages.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendation and we consider these issues resolved.

Third-Party Review and Authorization of Retroactive One-Time Payments

Team Coaches need to monitor retroactive one-time payments to ensure that there are third-party reviews and authorizations. We reviewed 28 retroactive one-time payments made from June 1999 through March 2001, and found that some payments did not have the required third-party signature.

- 6 of 28 (21 percent) retroactive one-time payments over \$25,000 did not have the third-party reviews and authorizations as required by VBA policy. This occurred because the VSC had only two senior VSRs that were fully trained at that time; the other senior VSRs had been promoted to the Rating Board. However, staff that had been promoted to the VSR positions were being provided ongoing training. VSC management fully discussed this issue with all Team Coaches as soon as we brought it to their attention. Our review of these one-time payments found them to be appropriate.

Recommendation 6 – We recommend the VARO Director ensure that Team Coaches monitor retroactive one-time payments for third-person authorizations.

Regional Office Director Comments

The Director concurred with the finding and recommendation. Team Coaches review all retroactive payments over \$25,000 before the Director conducts his review.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendation and we consider these issues resolved.

AIS and BDN Security

Management controls and oversight need to be strengthened over AIS and BDN security.

Conditions Identified

Management has the opportunity to enhance AIS and BDN security. The Information Resource Security Officer (IRSO) should have the authority to enforce security controls by reporting to the VARO Director. Controls need to be strengthened to ensure that employees do not inappropriately access or modify their compensation awards or those of other employees or relatives, and operational controls over employee command authorizations and the AIS Contingency Plan need to be improved. We found that the following security vulnerabilities required management attention.

IRSO Authority

The IRSO was a full-time position, but also had collateral operational responsibilities, and did not report to the VARO Director. As a result, the IRSO did not have the authority necessary to ensure that identified security weaknesses were resolved.

- The IRSO regularly reviewed the BDN security violation log and provided written notifications to service chiefs listing employees with BDN security violations (staff who had repeatedly accessed other employees' or their own disability awards). However, the IRSO did not know whether the service chiefs had taken corrective actions because they did not advise her of actions taken. According to the IRSO, she lacked the authority to ensure that appropriate actions were taken for security violations.
- 127 of 197 (64 percent) employees had a BDN access level of 7 or higher. Since employee/veteran files were also locked at sensitivity level 7, employees could readily access and modify C&P awards of other employees and relatives. This occurred because service chiefs were routinely requesting BDN access level 7 for employees, and the IRSO had no authority to limit the number of employees that could access and modify these awards.

BDN Security

While VBA had established an edit in the BDN security file to preclude employees from being able to access and modify their own C&P awards, the control was defeated because employee claim numbers were not entered into the BDN security file. The VARO had 27 employees with active C&P awards, including 20 that had access to BDN.

- 5 of 20 (25 percent) employees with active C&P awards and BDN access had their social security numbers (SSNs) in the BDN security file rather than their claim numbers. This occurred because the IRSO mistakenly believed that the SSNs would prevent employees from accessing and modifying their claims. We had four of the five employees attempt to access and modify their own C&P awards (the fifth one was an out-based employee who was not available to us for testing). Three of the four employees were able to access and modify their awards. The fourth employee could have modified his award if his access level had been higher.
- 5 of 33 (15 percent) employees hired during FY 2001 had not completed the Notice of Employment, Transfer, or Separation of Veteran (VAF 70-4535) indicating whether they or a family member were veterans receiving VA compensation or pension. The claims files of employees who are veterans, or their family members who are veterans, should be electronically locked or stored in locked files. The Chief, Human Resources Management (HRM) told us that this was part of the station's in-take procedures and he did not know why the employees did not complete the form. The Chief, HRM had four employees immediately complete the VAF 70-4535 when we brought this to his attention. The other employee had resigned prior to our review.

Operational Controls

Controls need to be improved over employee command authorizations and the AIS Contingency Plan. Employees had commands and access levels that had not been requested, and the AIS Contingency Plan had not been tested, as required by VA policy.

- 5 of 20 (25 percent) electronic Terminal Access Codes (TACs) sampled did not agree with the signed Terminal Access Authorizations (VAFs 20-8824). Two Terminal Access Authorizations had requests for commands that were not provided to the employees, and two employees had commands that were not requested on the Terminal Access Authorizations. We also found that three of these employees had access levels different than those requested (some TACs had multiple errors).
- The AIS Contingency Plan had not been tested during the last 3 years, as required. This increases the vulnerability to sensitive electronic data and delays timely restoration of operations in the event of a disaster. The IRSO stated that the testing had not been done because it was a labor-intensive and cumbersome exercise.

We also found that, although the IRSO informed employees of the mandatory elements to create a (b)(2)..... password, the BDN system did not require all of the elements necessary for a strong password. Subsequent discussions with the contractor that installed the software, and staff at VBA's Information Technology Center, showed that this (b)(2)..... VARO New Orleans. VBA is in the process of testing software containing a system edit to ensure that only a strong password can be used to access BDN. However, we will follow up on this issue (b)(2)......

Recommendation 7 – We recommend the VARO Director ensure that:

- a. The IRSO has the necessary authority to enforce security requirements by reporting to the VARO Office Director.
- b. Service chiefs are required to respond to the IRSO as to what actions are taken concerning security violations, and provide justifications for employees with BDN access levels of 7 or higher.
- c. Claim numbers for all employees are entered in the BDN security file.
- d. All staff complete VAF 70-4535 to identify employees and relatives receiving VA compensation so the claims records can be electronically and physically locked.
- e. The accuracy of all electronic TACs is verified and corrections made as necessary.
- f. The AIS Contingency Plan is tested every 3 years, as required.

Regional Office Director Comments

The Director concurred with the findings and recommendations. The Director designated the station's IRSO to enforce security requirements. Services chiefs are now required to respond to both the IRSO and the Director as to what actions are taken

concerning security violations, and to provide justifications for employees with BDN access levels of 7 or higher. A certified review of all employee/veteran BDN records was completed, and all employee claim numbers were entered in the BDN security file. All employees will complete VAF 20-344 (previously VAF 70-4535) by January 15, 2002, and all electronic TACs are currently being reviewed for accuracy. The IRSO is awaiting guidance from the Office of Information Management before conducting a test of the AIS Contingency Plan. In the interim, backups are performed on all servers nightly, and are tested periodically by retrieving files from various locations.

Office of Inspector General Comments

The Director's actions are responsive to the intent of the recommendations and we consider these issues resolved.

Suggestions for Management Attention

We also identified other issues that warrant management attention. We discussed each of these issues with the VARO Director and management staff, and the Director agreed to address each issue. (*See Checklist of Observations - Appendix II*).

Conditions Identified

- Semiannually reconcile the electronically locked files with the physically locked files.
- Continue to monitor the controls over VARO New Orleans employee claims that ensure they are not processed locally.
- Continue efforts to complete fiduciary field examinations that are over 120 days old more rapidly.
- Ensure the fiduciary activity supervisor meets annually with appropriate personnel at Louisiana VAMCs to coordinate visits to veterans in nursing homes.
- **(b)(2)**.....
- Continue to monitor the BDN User Identification (ID) file to identify and remove multiple and duplicate ID numbers.
- Ensure the veterans' status in the WINRS¹³ and BDN systems agree with documentation in the veterans' Counseling, Evaluation, and Rehabilitation (CER) folders.

¹³ WINRS is an information technology system used by VRE field staff to manage its caseloads.

Checklist of Observations

Areas checked "Yes" were generally operating in accordance with applicable policies and procedures. Areas checked "No" require management attention and should include a synopsis of the condition found. The areas checked "N/A" did not apply to this regional office or were not reviewed.

VARO Management

Continuity of Operations	Yes	No	N/A	Synopsis of Condition
1. VARO management monitored planned corrective actions for SAO reports.	✓			
2. VARO management monitored the results of the VSC's STAR Review process.	✓			
3. VARO management used the facility BSC to monitor the progress of the business lines in achieving their targets and strategic goals.	✓			
4. VARO management provided guidance and training for employees on ethical conduct and behavior.	✓			
5. VARO management monitored the DRO Program to ensure quality service to the veteran.	✓			
6. The facility COOP was comprehensive and complete.		✓		The facility COOP contained no emergency provision for 151 file cabinets on the first floor containing veterans' records.
7. The facility COOP has been tested and the results documented.		✓		A Table Top exercise was conducted in December 2000, but the results were not documented.

Veterans Service Center

Timeliness of Claims Processing	Yes	No	N/A	Synopsis of Condition
1. SAOs identified problem areas in the timeliness of claims processing, and appropriate corrective actions were taken.	✓			
2. Potential delays in the development of original or reopened C&P claims were identified and corrective actions taken.		✓		29 of 100 (29 percent) C&P original or reopened claims were not processed timely and/or accurately.
3. Corrective actions were implemented to improve BSC scores that had worsened or were above the national average.	✓			
4. The average processing times for C&P claims were the same as, or below the BSC national average.	✓			

Hospital Adjustments	Yes	No	N/A	Synopsis of Condition
5. C&P benefits were appropriately adjusted for veterans continually hospitalized at government expense for 90 days or more.		✓		5 of 36 (14 percent) benefits payments totaling almost \$25,000 were not reduced because the VSC did not take proper action when the notifications were received from Louisiana VAMCs that the veterans were hospitalized. 2 of 36 (6 percent) benefits payments totaling almost \$24,000 were not reduced because VAMC Alexandria did not advise the VSC that the veterans were hospitalized.

Locked Files	Yes	No	N/A	Synopsis of Condition
6. Sister station employee claims folders were located in locked files.		✓		15 of 27 (56 percent) employee/veteran claims folders from VARO Jackson were not in the locked files.
7. The annual SAO report on the quality of file activities including locked files was performed, as required.	✓			

Locked Files (Cont.)	Yes	No	N/A	Synopsis of Condition
8. Access to the locked file area was restricted.	✓			
9. Employee claims folders were located at the appropriate regional office.	✓			
10. The semi-annual reconciliation of both sensitive and locked files was conducted and discrepancies resolved.		✓		41 of 83 (49 percent) claims folders in the locked files had no annotation as to why they had been designated as sensitive.
11. Employees at the sister station adjudicated employee awards.		✓		2 of 27 (7 percent) employee awards were adjudicated at VARO New Orleans. One occurred in July 1986, and the other one in May 2000. The latter claim was pending when the employee was hired and was adjudicated less than 30 days later.

System-Generated Messages	Yes	No	N/A	Synopsis of Condition
12. C&P system-generated messages were handled appropriately and in accordance with criteria.		✓		12 of 44 (27 percent) system-generated messages were not processed in a timely manner, or in accordance with criteria.

Retroactive One-Time Payments	Yes	No	N/A	Synopsis of Condition
13. Retroactive one-time payments exceeding \$25,000 had the third-party reviews and signatures.		✓		6 of 28 (21 percent) retroactive one-time payments exceeding \$25,000 did not have the third-party reviews and signatures.
14. Multiple retroactive one-time payments over \$25,000 to the same payee were supported by appropriate documentation that justified the award.	✓			
15. Duplicate retroactive one-time payments issued were returned and not cashed.			✓	There were no duplicate retroactive one-time payments over \$25,000.

Fiduciary Field Examinations	Yes	No	N/A	Synopsis of Condition
16. The application receipt dates in the Fiduciary-Beneficiary System (FBS) system agreed with the dates stamped on the VAF 21-592.	✓			
17. Initial appointment field examinations were performed within 45 days as required.	✓			
18. Fiduciary field examinations were scheduled within one year of the initial appointment field examination.	✓			
19. Fiduciary field examinations were completed within 120 days of the scheduled examination.		✓		8 of 10 completed fiduciary field examinations belonging to one case manager exceeded 120 days. .(b)(6).
20. Accountings for beneficiaries were completed within 14 days.	✓			
21. Fiduciary accountings were performed as required by State law, and at least every 3 years.	✓			
22. Objections or exceptions to the accounts were taken within 14 days.	✓			
23. Accountings with discrepancies or legal issues were referred to District Counsel or OIG.	✓			
24. Fiduciary field examination reports provided detailed assessment information to document the adequacy of the veterans' physical health and well being.	✓			
25. Fiduciary field examination reports provided detailed assessment information to document the adequacy of the veterans' safety and environment.	✓			

Fiduciary Field Examinations (Cont.)	Yes	No	N/A	Synopsis of Condition
26. Fiduciary field examination reports disclosed beneficiaries who failed to receive assistance, or a referral to community or VAMC services to resolve living or health situations.	✓			
27. The fiduciary activity supervisor met annually with appropriate personnel from each VAMC in the jurisdiction to coordinate field examinations to nursing homes with VAMC caseworkers.		✓		Annual meetings with VAMC personnel to coordinate field examinations for veterans in nursing homes did not take place because the fiduciary activity supervisor was not aware of the requirement.
28. Fiduciary field examiners met with VHA case managers at least annually and maintained current information about VAMCs' residential care facilities for veterans.			✓	There were no veterans in residential care facilities.

Information Resources Management

Data Security	Yes	No	N/A	Synopsis of Condition
1. The IRSO did not have operational responsibilities for the AIS system and reported to the Regional Office Director.		✓		The IRSO had operational responsibilities and did not report to the Director.
2. Employees were required to change their passwords every 90 days.	✓			
3. After a specific number of failed logon attempts to the Local Area Network (LAN) system, an account was locked out.	✓			
4. (b)(2)		✓		(b)(2)
5. A security awareness bulletin was displayed when logging onto the LAN system.	✓			

Data Security (Cont.)	Yes	No	N/A	Synopsis of Condition
6. All terminals had activated password-protected screen savers.	✓			
7. Suspected breaches of security were identified and corrective actions taken.	✓			The IRSO identified and reported security violations to Service Chiefs, but had no authority to require corrective actions.
8. All personnel with access to VA systems had received initial and annual security awareness training, which was properly documented in their personnel files.	✓			

Physical Security	Yes	No	N/A	Synopsis of Condition
9. The computer room had the proper safeguards in place to ensure computer equipment was protected.	✓			
10. The AIS Contingency Plan had been tested every 3 years and results and corrective actions documented.		✓		The AIS Contingency Plan had not been tested in 3 years because VARO staff considered it labor-intensive and cumbersome.
11. The AIS Contingency Plan contained a listing of telephone numbers of key staff.	✓			
12. The AIS Contingency Plan contained a current listing of all computer equipment.	✓			
13. System backups of critical information were made and stored in a secure area onsite and offsite.	✓			
14. A full restoration of system backups had been tested.	✓			
15. The LAN system was supported by an uninterrupted power source (UPS).	✓			
16. The UPS system was periodically treated by IRM Service under full load conditions.	✓			

Internet Security	Yes	No	N/A	Synopsis of Condition
17. A local policy outlining the proper uses of the Internet had been issued.	✓			
18. All modems connected to the VA network had appropriate precautions taken to prevent unauthorized access to data.	✓			

BDN Security	Yes	No	N/A	Synopsis of Condition
19. Compensation claim numbers for employees with active awards were included in the BDN security file.		✓		5 of 20 (25 percent) employees with active awards and BDN access did not have their claim numbers in the BDN security file.
20. Employee claims records were electronically locked.	✓			
21. Electronic TACs agreed with the signed Terminal Access Authorizations (VAF 20-8824).		✓		5 of 20 (25 percent) TACs did not agree with the Terminal Access Authorizations. Employees had commands not requested, commands requested were not provided, and employees had incorrect access levels.
22. New employees completed VAF 70-4535 indicating whether they or a family member were veterans receiving compensation.		✓		5 of 33 (15 percent) employees had not completed VAF 70-4535.
23. Employees were not issued multiple BDN user ID numbers.		✓		21 of 321 (7 percent) BDN users had multiple ID numbers for different Gateways. 11 of 321 (3 percent) BDN users had ID numbers that were also assigned to another employee. The IRSO took immediate action to remove the multiple ID numbers from the BDN User ID File.
24. Justification was provided for BDN access levels of 7 or higher.		✓		127 of 197 (64 percent) employees had an access level of 7 or higher without documented justification.

Vocational Rehabilitation and Employment

VR&E	Yes	No	N/A	Synopsis of Condition
1. Veterans receiving rehabilitation services were eligible and entitled to the benefits.	✓			
2. VR&E applications were processed within 60 days of the dates of claim.	✓			
3. Appropriate dates of claim were being established in BDN to properly calculate timeliness.	✓			
4. The veteran's status found on the WINRS system agreed with the status found in the BDN and the veteran's CER folder.		✓		2 of 5 Evaluation/Planning cases in BDN open case status were closed in the CER and WINRS.
5. The CER folder documentation of veterans' eligibility status and initial appointment dates were complete and accurate.	✓			
6. The CER file contained documentation that veterans were still employed after 60 days.			✓	Documentation in the CER files sampled showed program participants had not entered the employment phase at the time our review.
7. Appropriate controls were in place to ensure the accuracy of tuition payments and fees.	✓			
8. Appropriate controls were in place to ensure the accuracy of vendor claims and payments.	✓			
9. Appropriate controls were in place to ensure proper procedures were followed on credit card purchases.	✓			
10. Appropriate controls were in place to ensure purchases had the proper justifications and authorizations.	✓			

VR&E (Cont.)	Yes	No	N/A	Synopsis of Condition
11. Veterans were contacted to ensure they received the services and supplies that were purchased for them.			✓	Cases sampled did not contain documentation that they were included in the case managers' monthly judgmental sample of contact cases.
12. VR&E counselors were adequately justifying veterans' requests to change goals and objectives.	✓			
13. VR&E counselors were providing veterans participating in the program support services such as childcare, even though VA policy does not address these types of services.		✓		These services had not been provided pending further guidance from VA headquarters.
14. VR&E provided counseling services to veterans rather than using a contractor.	✓			
15. VR&E managers coordinated with and used available VHA facilities for VR&E participants' medical/dental needs.	✓			
16. VR&E managers ensured that participants' medical and dental needs were provided timely without disruption to training.	✓			
17. Non-VA medical care provided to VR&E participants in lieu of VHA services was necessary.			✓	The sample did not contain any cases in this category.

Balanced Scorecard Results Comparison June 2000 to June 2001

Compensation and Pension

Measures	National		VARO	
	FY 2001 Target	Average June 2001	Average June 2000	Average June 2001
SPEED				
Rating Related Actions (Completed) – Days	195.0	175.4	119.0	118.3
Rating Related Actions (Pending) – Days	201.0	167.3	107.0	128.0
Non-Rating Related Actions (Completed) - Days	54.0	49.0	32.0	29.6
Non-Rating Related Actions (Pending) - Days	85.0	106.4	70.0	90.8
Appeals Resolution - Average Days/Case - Days	650.0	597.4	700.0	535.8
Fiduciary Activities - Initial Appts/Field Exams	12.0%	13.4%	6.0%	12.2%
ACCURACY				
National Accuracy Rate (core rating work)	72.0%	68.1%	56.0%	65.2%
National Accuracy Rate (authorization work)	62.0%	55.8%	54.0%	57.4%
National Accuracy Rate (fiduciary work)	65.0%	65.5%	66.0%	64.7%
UNIT COST				
Cost per Compensation Claim Completed	TBD	\$427	\$309	\$315
Cost per Pension Claim Completed	TBD	\$220	\$125	\$158
Cost per Active Compensation Case on the Rolls	TBD	\$167	\$167	\$197
Cost per Active Pension Case on the Rolls	TBD	\$290	\$180	\$211
CUSTOMER SATISFACTION				
Overall Satisfaction	60.0%	55.7%	57.0%	57.5%
Customer Orientation	68.0%	65.7%	68.0%	67.3%
Appeals Ratio	8.0%	8.0%	NA	7.9%
Telephone Activities - Abandoned Call Rate	7.0%	5.4%	6.0%	3.5%
Telephone Activities - Blocked Call Rate	5.0%	2.9%	12.0%	6.7%
EMPLOYEE DEVELOPMENT & SATISFACTION				
Employee Development Skill Matrix	TBD	TBD	TBD	NA
One VA Survey (mean score)	3.6	3.3	3.3	3.3

TBD = To Be Determined
NA = Not Applicable

Balanced Scorecard Results Comparison June 2000 to June 2001

Measures	Loan Guaranty			
	National		VARO	
	FY 2001 Target	Average June 2001	Average June 2000	Average June 2001
SPEED				
Acquired Property Holding Time (months)	10.0	8.2	9.9	8.5
Processing time for eligibility certificates	5.0	7.9	9.0	NA
ACCURACY				
Foreclosure Avoidance Through Servicing (FATS) ratio	33.0%	38.7%	NA	NA
Statistical Quality Control (SQC) Index	93.0%	95.4%	98.1%	98.0%
UNIT COST				
Return on Sales of Acquired Properties (ROS)	97.5%	TBD	104.4%	TBD
Administrative cost per loan guaranty issued	TBD	\$300	NA	NA
Administrative servicing cost per default processed	TBD	\$1,477	NA	NA
Administrative cost per property sold	TBD	\$3,841	\$5,380	\$9,439
CUSTOMER SATISFACTION				
Veteran Satisfaction Index	TBD	92.9%	TBD	92.9%
Lender Satisfaction Index	TBD	74.0%	TBD	74.0%
Telephone Activities - Abandoned Call Rate	5.0%	4.5%	NA	NA
Telephone Activities - Blocked Call Rate	5.0%	18.2%	NA	NA
EMPLOYEE DEVELOPMENT & SATISFACTION				
Employee Development Skill Matrix	TBD	79.1%	TBD	TBD
One VA Survey (mean score)	3.0	3.3	3.3	3.3

Vocational Rehabilitation and Employment

SPEED				
Days to Notification - Entitlement Determination	66.0	61.8	80.5	71.3
Days to Employment	50.0	37.7	46.0	58.6
ACCURACY				
Entitlement Determination Accuracy	91.0%	93.0%	87.0%	96.0%
Evaluation, Planning, & Services Accuracy	89.0%	79.0%	87.0%	84.0%
Fiscal Accuracy	96.0%	87.0%	98.0%	89.0%
UNIT COST				
Cost to Provide a Veteran a Program of Services	TBD	\$2,117	\$1,790	\$2,100
CUSTOMER SATISFACTION				
Rehabilitation Rate	65.0%	64.2%	53.2%	70.7%
SEH Rehabilitation Rate	63.0%	63.4%	48.2%	66.7%
Customer Access Satisfaction	79.0%	76.0%	76.6%	77.2%
Customer Satisfaction Survey	80.0%	74.0%	82.0%	79.3%
EMPLOYEE DEVELOPMENT & SATISFACTION				
Employee Development Skill Matrix	TBD	62.7%	TBD	60.2%
One VA Survey (mean score)	3.6	3.5	3.3	3.3

Regional Office Director Comments



DEPARTMENT OF VETERANS AFFAIRS

Regional Office
701 Loyola Avenue
New Orleans, LA 70113

November 19, 2001

In Reply Refer To: 321/00

Mr. James R. Hudson
Director (52AT)
Office of Inspector General
Atlanta Audit Operations Division
1700 Clairmont Road
Decatur, GA 30033

SUBJ: Draft Report: Combined Assessment Program Review - VA Regional Office,
New Orleans, LA (Project No. 2001-02213-R3-0135)

In response to the findings and recommendations of the above-referenced Combined Assessment Program (CAP) Review, the New Orleans VA Regional Office is furnishing the following comments:

Recommendation 1: We concur with all parts of the recommendation.

- a. Emergency provisions are developed and included in the facility COOP for safeguarding the veterans' records on the first floor.

Response: The Regional Office has contracted with Turnkey Services in Jackson, Mississippi, to develop a new floor plan for our second floor office space to house all file cabinets presently located on the first floor. The final decision to make this change will be contingent upon FY 2002 staffing levels allocated to the Regional Office, which may have an impact on available space. In the interim, short-term, emergency plans are in place which would provide for the movement of all file cabinets from the first floor using contract labor.

- b. The results of Table Top exercises to test the COOP are documented, including vulnerabilities identified and corrective actions needed.

Response: The annual Table Top exercise to be conducted in December 2001 will be documented to include identified vulnerabilities and corrective actions taken.

- c. A follow-up system is developed to ensure that needed corrective actions are taken.

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Response: Identified vulnerabilities and required corrective actions documented in the annual COOP Table Top exercise will be included in the Director's Office diary system to ensure timely completion.

Recommendation 2: We concur with the recommendation.

We recommend that VARO Director ensure that VSR training includes emphasis on timeliness and accuracy of C&P claims processing in the specific areas identified by the OIG review.

Response: The Veterans Service Center will provide VSR training on timeliness and accuracy of C&P claims processing not later than April 1, 2002.

Recommendation 3: We concur with all parts of the recommendation.

a. VSC staff receive refresher training on proper adjustments to prevent overpayments.

Response: The Veterans Service Center will provide refresher training on hospital adjustments to VSC employees not later than April 1, 2002.

b. VSC management meet with appropriate staff at VAMC Alexandria to discuss the VAMC notifying the VSC when veterans are hospitalized 90 days or more.

Response: The Veterans Service Center will meet with officials from the VAMC Alexandria to discuss the importance of the VSC being notified when a veteran is hospitalized 90 days or more. This will be accomplished not later than April 1, 2002.

Recommendation 4: We concur with the recommendation.

a. A control log is used that requires employees to sign-out locked files and return them by the close of the same day.

Response: The Veterans Service Center will implement a control log to sign-out locked files and have them returned by the close of the same day. This will be implemented not later than December 1, 2001.

b. All claims folders in the locked files are appropriately labeled.

Response: The Veterans Service Center will have all folders in locked files properly labeled not later than December 1, 2001.

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c. The locked files are physically inventoried during the semi-annual reconciliation.

Response: The Veterans Service Center has provided a schedule for the semi-annual audit of locked files. **(b)(2)**.....
.....

Recommendation 5: We concur with the recommendation.

We recommend the VARO Director ensure that VSRs receive refresher training on the timely and accurate processing of system-generated messages.

Response: The Veterans Service Center will provide VSRs with refresher training on timely and accurate processing of system-generated messages not later than April 1, 2002.

Recommendation 6: We concur with the recommendation.

We recommend the VARO Director ensure that Team Coaches monitor retroactive one-time payments for third-person authorizations.

Response: The Veterans Service Center has a system in place that Coaches review all \$25,000 and above retro payments before the Director conducts his review.

Recommendation 7: We concur with all parts of the recommendation.

a. The IRSO has the necessary authority to enforce security requirements by reporting to the VARO Office Director.

Response: In accordance with VA Directive 6210, a designation of authority is in place in which the Director designates the station's IRSO who is responsible for enforcing security requirements. In addition, beginning October 2001, Division Chiefs are required to respond to security violations to both the IRSO and the Office of the Director.

b. Service Chiefs are required to respond to the IRSO as to what actions are taken concerning security violations, and provide justifications for employees with BDN access levels of 7 or higher.

Response: Beginning with the violations reports of Fiscal Year 2002, Division Chiefs are required to respond within 5 workdays to both the IRSO and the Office of the Director as to what actions were taken regarding reported violations along with justification for level 7 access, as required. A meeting is scheduled

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during the week of November 26, 2001, with the Assistant Director, IRSO, and Division Chiefs to discuss security violations and required responses.

- c. Claim numbers for all employees are entered in the BDN security file.

Response: A complete review of all veteran-employee BDN records was certified during September 2001. All records are linked by claim number and BDN EIN (employee identification number - 4 digit access number).

- d. All staff complete VAF 70-4535 to identify employees and relatives receiving VA compensation so the claims records can be electronically and physically locked.

Response: OFO Letter 201-02-15, Internal Controls Annual Employee Certification of Veteran Status and Veteran Relatives, mandates that "All VBA employees (including Veterans Service Organizations and other VA employees housed at RO facilities) must complete the certification." This certification is required by January 15, 2002, and by the same date of each year thereafter. The certification will include VA Form 20-344 (which replaces VAF 70-4535) and a notification form (to be placed in the veteran's claims file).

- e. The accuracy of all electronic TACs is verified and corrections made as necessary.

Response: A review is being conducted of all Terminal Access Authorization forms (VAF 20-8824). Changes requested by the Division Chiefs will be made by January 2002.

- f. The AIS Contingency Plan is tested every 3 years, as required.

Response: The IRSO is awaiting guidance from the Office of Information Management (20S) before conducting a test of the AIS Contingency Plan. In the interim, backups are performed on all servers nightly. Each morning the logs are reviewed. These backups are tested periodically by retrieving files from various locations.

Estimate of Monetary Benefits: We concur with the OIG findings.

If you have any questions, please contact me at (504) 619-4590.

/s/

Barry Jackson
Director

Monetary Benefits in
Accordance With IG Act Amendments

Report Title: Combined Assessment Program Review
VA Regional Office New Orleans, Louisiana

Report Number: 01-02213-31

<u>Recommendation Number</u>	<u>Category/Explanation of Benefits</u>	<u>Better Use of Funds</u>
3	Benefit reductions for veterans hospitalized more than 90 days.	\$49,000
Total		\$49,000

Final Report Distribution

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