



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS BENEFITS ADMINISTRATION

Processing Inaccuracies
Involving Veterans' Intent to
File Submissions for Benefits

REVIEW

REPORT #17-04919-210

AUGUST 21, 2018



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Executive Summary

Why the OIG Did This Review

The OIG sought to determine whether Veterans Benefits Administration (VBA) staff assigned correct effective dates¹ on claims for compensation benefits with an intent to file (ITF). In March 2015, the Department of Veterans Affairs required all claims for benefits to be filed on standard forms to improve the quality and timeliness of processing veterans' claims for benefits. VA acknowledged that some veterans might need additional time to gather all of the information and evidence necessary to support their claims and, therefore, applicants may notify VA of their intent to file a claim in order to establish the earliest possible effective date for benefits, if determined eligible. In other words, an ITF allows claimants the opportunity to provide minimal information related to the benefit sought and gives them up to one year to submit a complete claim. From the inception of the ITF process in March 2015 through September 30, 2017, VBA reported receiving more than one million claims with ITFs.

Because of the sheer volume of ITF submissions and the severity of the findings identified in a report released last year²—all factors contributing to an elevated risk of underpayments to veterans—the OIG initiated a national review.

What the Review Found

VBA staff did not always assign correct effective dates for compensation benefits with receipt of ITFs. The OIG estimated that 22,600 of 137,000 cases (17 percent) completed from March 24, 2015, through September 30, 2017, resulted in \$72.5 million in improper benefits payments.³ These improper payments (most were underpayments to veterans) represent missed payments that should have been made between the correct effective date and the one assigned. Most of the errors occurred from March 24, 2015, through July 21, 2016, during the first 16 months of VBA's implementation of the ITF concept. Thereafter, significant improvement was shown with the assignment of effective dates with ITF submissions.

The OIG determined that errors generally occurred because Compensation Service did not set up standard operating procedures prior to the implementation of new guidance. Compensation Service Acting Assistant Director and program analysts for Procedures gave processing staff inadequate procedural guidance that lacked specific details for locating electronic ITF

¹ M21-1 Adjudication Procedures Manual, Part III, Subpart ii, Chapter 2, Section C, Topic 2, *Why Communication of an ITF Is Important*.

² *Review of Alleged Use of Incorrect Effective Dates at the VA Regional Office in Chicago, Illinois*, (Report No. 16-02806-182, March 31, 2017).

³ VA OIG statisticians' projection of estimated cases with errors. Projections do not total precisely due to rounding.

submissions within the Veterans Benefits Management System⁴ (VBMS). The Acting Assistant Director for Procedures indicated that the ITF process was an initiative with a six-month implementation and delivery period. The VBA official stated that the initiative considerably affected VBA's policy and procedures and those six months were not enough time to produce sound guidance. VBA had to restructure policies, procedures, and claims processing systems within a short time frame. Because of these time constraints, as related to system functionality, the Acting Assistant Director for Policy stated that they produced a minimally viable product. Likewise, because of the absence of granularity in the procedural guidance, management and staff interviewed at the three VAROs visited,⁵ stated that errors occurred because they were unaware of the location of electronic ITFs within VBMS. In the majority of the cases reviewed, veterans had submitted ITFs either electronically or by phone and so in the electronic claims folders, no document corresponded to the ITF. To do their job correctly, rating personnel would need to know where to locate ITFs within VBMS in order to assign correct effective dates for compensation benefits.

In addition, the OIG found that ITF training was deficient. After reviewing all of the completed mandatory ITF-related training, the OIG found that all training completed before March 2017 lacked specific information for identifying an electronically submitted ITF. In March 2016, Compensation Service's Quality Assurance staff conducted a national call because their analysts had identified an error trend related to assigning correct effective dates for ITF submissions. However, the Compensation Service Assistant Director for Training did not require VARO staff to complete mandatory ITF training—which discussed how to identify an ITF in the electronic record—until March 31, 2017, a delay of more than one year after discovering the error trend.

In fact, VBMS contained ITF data; however, the system lacked the functionality to assist rating personnel when assigning effective dates for benefits based on ITFs. More than two years after the implementation of ITF, on June 13, 2017, VBA updated VBMS. Even so, modernization of functionality within VBMS could improve accuracy of assigning effective dates related to ITF submissions.

What the OIG Recommended

The OIG recommended the Under Secretary for Benefits take steps to prioritize the modernization of functionality and consider integrating ITF submissions into VBMS to improve accuracy. Despite having observed significant improvement with assigning effective dates

⁴ Veterans Benefits Management System (VBMS) is a web-based, electronic claims processing system.

⁵ The VAROs visited were Portland, Oregon; Oakland, California; and Waco, Texas. Staff and management interviewed included Supervisory Veterans Service Representatives, Rating Veterans Service Representatives, and quality review staff.

related to ITF submissions, the OIG also recommended a plan to conduct a special review of veterans' claims with ITF submissions from March 24, 2015, through September 30, 2017.

Management Comments

The Under Secretary for Benefits concurred with Recommendation 1, concurred in principle with Recommendation 2, and provided acceptable action plans for both recommendations. The OIG will monitor VBA's progress and follow up on implementation of the recommendations until all proposed actions are completed.

The Under Secretary for Benefits provided additional technical comments, which the OIG reviewed and addressed accordingly.



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Abbreviations

FY	Fiscal Year
ITF	Intent to File
OIG	Office of Inspector General
RVSR	Rating Veterans Service Representative
VA	Department of Veterans Affairs
VARO	Veterans Affairs Regional Office
VBA	Veterans Benefits Administration
VBMS	Veterans Benefits Management System

Introduction

Objective

The purpose of this review was to determine whether Veterans Benefits Administration (VBA) staff assigned correct effective dates for compensation benefits with submissions of an intent to file (ITF). From March 24, 2015, through September 30, 2017, VBA reported receiving more than one million claims with ITFs. In March 2017, the OIG published a report,⁶ which substantiated an allegation that staff at one VA Regional Office (VARO) did not always assign correct effective dates for claims associated with ITF submissions. Errors resulting from incorrect effective dates based on ITF submissions may cause improper payments to veterans. Because of the severity of the findings in that OIG report, the number of ITFs submitted, and the elevated risk of underpayment to veterans, a national review was initiated.

Intent to File Process

Before March 24, 2015, VA could grant entitlement to benefits as early as the date of receipt of an informal claim if the claimant submitted a formal claim within one year of the date VA sent the claimant the application form. To standardize its claims process, VA removed informal claims from its regulations and replaced them with the ITF process on March 24, 2015.⁷ With the new process, claimants can submit an ITF electronically, by mail, or by calling a VA representative; this allows them the opportunity to provide minimal information related to the benefit sought and gives them up to one year to submit a complete claim. The submission date of an ITF is important because VA may use the ITF's date of receipt as an earlier effective date for paying benefits.⁸

Here is an example, borrowed from VBA's procedures, for the proper application of an effective date when an ITF is involved. On June 1, 2015, VA received an ITF on VA Form 21-0966.⁹ On January 1, 2016, VA received a completed and signed application with a claim for an increased evaluation of the veteran's service-connected disabilities. The potential effective date of entitlement to increased compensation is June 1, 2015, because VA received the application within one year of the date it received the veteran's communication of an ITF.¹⁰

⁶ *Review of Alleged Use of Incorrect Effective Dates at the VA Regional Office in Chicago, Illinois*, (Report No. 16-02806-182, March 31, 2017).

⁷ See Appendix A for specific discussion of VA's communication of the ITF process to veterans and stakeholders.

⁸ M21-1 Adjudication Procedures Manual, Part III, Subpart ii, Chapter 2, Section C, Topic 2, *Informal Claims Received Prior to March 24, 2015, Communication of an ITF, and Requests for Application*.

⁹ VA Form 21-0966, *Intent to File a Claim for Compensation and/or Pension, or Survivors Pension and/or DIC*.

¹⁰ M21-1 Adjudication Procedures Manual, Part III, Subpart ii, Chapter 2, Section C, Topic 2, *ITFs*.

Results and Recommendations

Finding 1: VBA Staff Assigned Incorrect Effective Dates for Claims with ITF Submissions

VBA staff did not always assign correct effective dates for compensation benefits with ITF submissions. The OIG estimated that 22,600 of 137,000 cases completed from March 24, 2015, through September 30, 2017, had incorrect effective dates assigned for compensation benefits whenever a veteran submitted an ITF. Significant improvement was shown following the initial ITF implementation period, with the improper processing of effective dates decreasing from a 43 percent error rate to 4 percent. The OIG determined that errors generally occurred because of the considerable impact to VBA's policy and procedures and the time frame to implement the initiative had been too short. Standard operating procedures for the creation of new guidance did not exist. Likewise, manual procedures¹¹ lacked specific details for rating personnel to be able to locate electronic ITF submissions within VBA's electronic claims processing system—the Veterans Benefits Management System (VBMS).¹² As such, rating personnel¹³ did not consider the date VA received an ITF when assigning effective dates for benefits payments.

The former Assistant Director for Training at Compensation Service initially had mandated ITF training; however, this training was deficient because it did not include specific details to locate an electronic ITF within VBMS. Later, staff were not required to complete training that included those very details for approximately one year following identification of an error trend. In addition, VBMS lacked the functionality to assist staff with the consideration and identification of an ITF when assigning effective dates.

Updated procedural guidance, additional training, and system enhancements resulted in significant improvement since the inception of ITF. Even so, VBA's assignment of incorrect effective dates resulted in an estimated \$72.5 million in inaccurate benefits payments to veterans from March 24, 2015, through September 30, 2017.

Incorrect Effective Dates for Claims with ITF Submissions

The OIG divided the universe of cases into three periods based on ITF events. The OIG selected a statistical sample of 100 cases from each period for a total of 300 cases completed from March 24, 2015, through September 30, 2017, to determine the accuracy of effective dates

¹¹ The manual provides guidance on the purpose of an ITF, including how an ITF can be used to establish and assign an earlier effective date and links to a VBMS User Guide, explaining how to locate ITFs in VBMS.

¹² Veterans Benefits Management System (VBMS) is a web-based, electronic, claims processing system.

¹³ Rating personnel included Rating Veterans Service Representatives (RVSR), Decision Review Officers, and Rating Quality Review Specialists.

assigned. The OIG determined that VBA staff incorrectly assigned effective dates for compensation benefits with ITF submissions in 56 cases.

Table 1 illustrates cases reviewed, cases with errors, estimated population, estimated cases with errors, and the error rate for each review period related to significant ITF events.

Table 1. Processing Errors with Projections

Significant ITF Events	Cases Reviewed	Cases with Errors	Estimated Population	Estimated Cases with Errors	Error Rate
Initial ITF implementation March 24, 2015, through July 21, 2016	100	43	35,400	15,200	43%
Post-procedure update July 22, 2016, through June 12, 2017	100	9	66,400	6,000	9%
ITF banner update June 13, 2017, through September 30, 2017	100	4	35,200	1,400	4%
Total	300	56	137,000	22,600	17%

Source: VA OIG data analysis and statisticians' projections

Note: Population, cases with errors, and error rate columns contain estimated figures. Amounts may not total precisely due to rounding.

Based on this sample, the OIG estimated that 22,600 of the 137,000 cases (17 percent) completed had incorrect effective dates assigned. Of the 22,600 cases with errors, 21,900 (97 percent) resulted in underpayments and represent money that should have been paid to veterans between the correct effective date and the one assigned. Most of the errors occurred from March 24, 2015, through July 21, 2016, during the initial ITF implementation period. The error percentage steadily decreased during each of the review periods, namely, for cases completed from July 22, 2016, through June 12, 2017; and cases completed from June 13 through September 30, 2017. Most of the errors occurred with electronic ITF submissions.

Errors during Initial ITF Implementation Period

The OIG estimated that in 15,200 of 35,400 cases (43 percent) completed from March 24, 2015, through July 21, 2016, rating personnel assigned incorrect effective dates. In most of the cases reviewed, veterans submitted ITFs either electronically or by phone and, therefore, no document corresponded to the ITF in the electronic claims folders. Here are three examples of errors with incorrect effective dates that resulted in improper payments.

Example 1: Uncorrected Underpayment

A veteran electronically submitted an ITF in 2015. VA received the completed claim a little over six months later and a Decision Review Officer used the receipt date of the completed claim as the effective date for compensation benefits. However, the correct effective date should have been the date the veteran submitted the ITF. This error resulted in an underpayment to the veteran of approximately \$6,600 over six months.

Example 2: Overpayment

A veteran requested an application for benefits in 2015. Eight weeks later, the veteran electronically submitted an ITF. VA received the completed claim 15 weeks later. An RVSR used the date VA received the application request as the effective date for compensation benefits. However, the correct effective date should have been the date the veteran submitted the ITF. This error resulted in an overpayment to the veteran of approximately \$1,100 over two months.

Example 3: Corrected Underpayment

A veteran electronically submitted an ITF in 2015. VA received the completed claim nine weeks later and an RVSR used this date as the effective date for compensation benefits. The correct effective date should have been the date the veteran submitted the ITF. This error resulted in an underpayment to the veteran of approximately \$2,400 over three months. However, the veteran notified VBA staff of the error by disagreeing over the effective date of his increased benefits. In 2016, a Decision Review Officer corrected the error and VBA paid retroactive benefits.¹⁴

Errors during Post-procedure Update Period

VBA modified its ITF procedures on July 22, 2016, to include guidance and specific details on how to identify ITFs received electronically or by mail.¹⁵ The OIG estimated that in 6,000 of 66,400 cases (9 percent), rating personnel assigned incorrect effective dates. The number of errors decreased significantly during the post-procedure update period ranging from July 22, 2016, through June 12, 2017. (As illustrated in Chart 1 on page 8.)

¹⁴ The OIG treated as errors all underpayments that VBA identified and later corrected.

¹⁵ M21-1 Adjudication Procedures Manual, Part III, Subpart ii, Chapter 2, Section C, Topic 1, *Identification of an Informal Original Claim Received Prior to March 24, 2015, and Communication of an ITF*, updated July 22, 2016.

Absence of Standard Operating Procedures

VBA's Compensation Service did not have standard operating procedures when creating new guidance. Interviews with Compensation Services' Acting Assistant Director for Policy and Acting Assistant Director for Procedures revealed they had a separate, formal concurrence process for approval of new policies and procedures. The Acting Assistant Director for Procedures stated that the concurrence process begins after manual procedures are drafted; however, this official could not provide the OIG with standard operating procedures to follow for the creation of new guidance. Without standard operating procedures in place dictating the steps that are required when creating a new procedure, one can leave out key information or fail to target the appropriate claims processors for a given policy. When VBA initially implemented the ITF policy, its procedures mainly focused on what to do with an incomplete ITF and how to enter ITF data into VBMS. However, the guidance did not give rating personnel instructions on how to identify the electronic submission of an ITF.

The Compensation Service's office of Procedures' lack of standard operating procedures when implementing ITF guidance contributed to a high error rate. However, because of a significant decrease in errors identified following the initial implementation of ITF, the OIG made no recommendations for improvement in this area.

Inadequate Procedural Guidance on Electronic ITF Submissions

VBA's Compensation Service Acting Assistant Director and program analysts for Procedures provided inadequate procedural guidance associated with ITF submissions. The manual procedures¹⁶ from March 24, 2015, through July 21, 2016, lacked details on the identification of electronic ITF submissions for rating personnel to correctly assign effective dates, despite numerous updates. These updates provided clarification of previous procedures, relocation of sections of the guidance, or deletion of older instructions from earlier versions. According to Veterans Service Center Managers, Supervisory Veterans Service Representatives, and staff at the three VAROs visited,¹⁷ most errors occurred because rating personnel were unaware of the location of electronic ITFs within VBMS. Furthermore, Compensation Service Quality Assurance staff stated that they were initially unaware of how to locate electronic ITFs. They did not anticipate that an electronic submission of an ITF would lack a corresponding document.

Typically, rating personnel would review documents in the electronic claims folder to identify the effective date. Under the new process, ITFs submitted electronically would have no corresponding document in the electronic claims folders when veterans or their representatives

¹⁶ M21-1 Adjudication Procedures Manual.

¹⁷ The three VAROs visited were Portland, Oregon; Oakland, California; and Waco, Texas. See Appendix B for further discussion of the scope and methodology of the review. Staff and management interviewed included Supervisory Veterans Service Representatives, RVSRs, and quality review staff.

file ITF submissions.¹⁸ Rather, these electronic ITFs were accessed through the designated navigation menu labeled veteran¹⁹ within VBMS.²⁰ With the new process, rating personnel would be required to navigate to the menu and select the ITF option in order to assign the correct effective date.

An interview with the Acting Assistant Director for Procedures disclosed that at first ITF was an initiative with a time-period of six months to implement and deliver a product. The VBA official stated that the initiative considerably affected VBA's policy and procedures and those six months were not enough time to produce sound guidance. Because of these time constraints, as related to system functionality, the Acting Assistant Director for Policy stated that they produced a minimally viable product. The Acting Assistant Director for Policy stated that the ITF process was not part of the original proposed rule but resulted from negative feedback received from Veterans Service Organizations about the elimination of the informal claim process. Consequently, VBA had to restructure policies, procedures, and claims processing systems within a short time frame.

Deficient and Delayed ITF Training

The OIG reviewed all completed mandatory ITF-related training from March 2015 through March 2017 and determined that the training completed before March 2017 was deficient; it did not help rating personnel because it lacked specific information related to identifying an electronically submitted ITF. Compensation Service provided the OIG with an instructional video dated March 2015. Although the video provided instructions on how to record the receipt of an ITF in VBMS, it did not show how rating personnel would locate an electronically submitted ITF. Plus, communication from staff indicated there were technical issues with viewing the video. Furthermore, a program analyst for Procedures indicated the video was later removed because it was not 508 compliant.²¹ The OIG was unable to substantiate whether any staff were able to view this video because it was no longer available.

Quality Assurance

In March 2016, Quality Assurance conducted a national quality call to inform VBA staff of an error trend with effective dates and ITF. Based on the error trend, Quality Assurance provided

¹⁸ M21-1 Adjudication Procedures Manual, Part III, Subpart ii, Chapter 2, Section C, Topic 2, ITF, *How the Corporate Record Is Updated to Reflect Receipt of a Communication of an ITF*.

¹⁹ This menu is a list that includes dependents, military service, power of attorney, veteran profile, and ITF.

²⁰ M21-1 Adjudication Procedures Manual, Part III, Subpart ii, Chapter 2, Section C, Topic 1, *Identification of an Informal Original Claim Received Prior to March 24, 2015, and Communication of an ITF*.

²¹ Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 (d)), requires federal agencies that develop, procure, maintain, or use Information and Communication Technology to ensure that these technologies provide access to information and data to individuals with disabilities.

explicit instructions on how to identify the presence of an electronic ITF filing in VBMS. The Acting Assistant Director for Procedures indicated they rely upon information from error trends and feedback from the field to update guidance. The VBA official reported that manual procedures were updated after receiving the error trend analysis. However, it took until July 22, 2016, approximately four months from identification of the error trend, to include these instructions.

The Assistant Director for Training revealed that the impetus to create and disseminate training to VBA staff came from policy and procedures, as well as error trends identified by Quality Assurance. The VBA official reported that the development of mandatory training should ideally occur within a three-month time frame following identification of an error trend, depending on other competing priorities. Mandatory training was created and made available to rating personnel in January 2017. The same official required VARO staff to complete the training by March 31, 2017, a delay of approximately one year following the discovery of the error trend.

VBMS Lacked Functionality

Although VBMS contained data on ITFs, since the initial implementation of the ITF policy, the system lacked the functionality within the integrated effective date builder²² to take into account an ITF or to alert rating personnel of an ITF submission when assigning effective dates for benefits. A program analyst for Procedures stated that the tool for building effective dates within VBMS needed updating to account for ITFs. Interview with the Chief for Business Management at Compensation Service established that there were no official discussions to update the tool at the time the ITF policy was implemented. The OIG confirmed that the tool does not account for ITF submissions. The rating personnel interviewed indicated that it would be helpful if the effective date builder within VBMS calculated an effective date based on ITF. Some staff stated that they bypassed the tool or manually overrode the applied effective date from the builder to account for ITF submissions for effective dates for benefits. However, if rating personnel did not manually override the system-generated effective date, it would be incorrect.

A national call conducted by Quality Assurance on August 3, 2016, revealed that requirements were being drafted to create in VBMS a banner alerting staff that an ITF was on record. On June 13, 2017, more than two years after the implementation of ITF, VBMS was updated to display a banner warning rating personnel that an ITF existed and should be considered when assigning an effective date. Before this system update, rating personnel had to rely on the existing procedural and training guidance to include ITF submissions when determining effective dates.

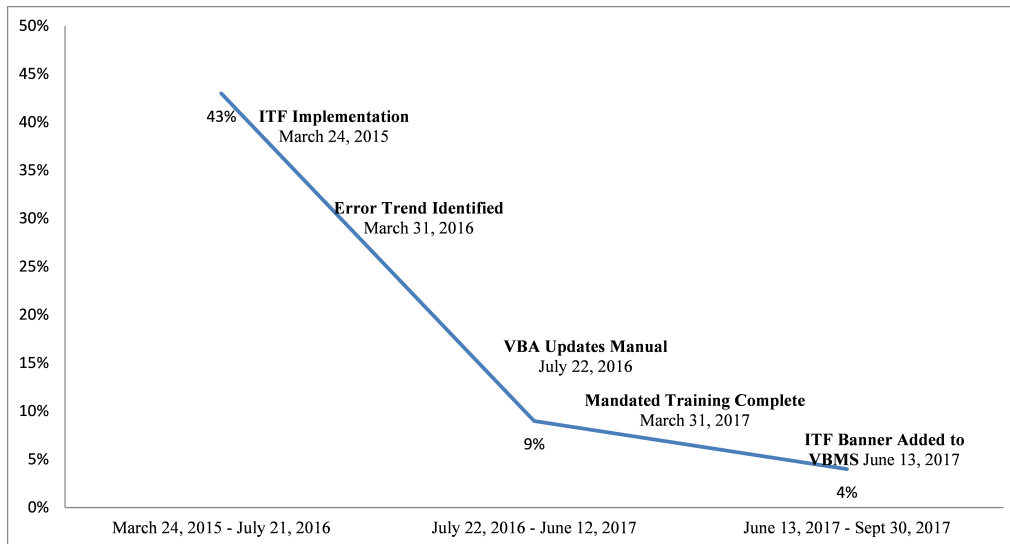
²² The effective date builder calculates an effective date for a disability decision evaluation based on existing data, including but not limited to, the claim date and the release from active duty date.

While the banner is meant as a reminder that an ITF exists, rating personnel the OIG interviewed reported that the banner provides a reminder to check for an ITF submission, even if one is not associated with the claim. Moreover, the banner did not prevent the further processing of a claim if rating personnel did not address an ITF. In fact, rating personnel could still assign an effective date without considering ITF submissions even if they reviewed the banner.

Compensation Service reported that business requirements were submitted in October 2016; this resulted in additional functionality within VBMS as it provided an alert message to update the status of an “active” ITF to “claim received” when adding new claimed issues. Compensation Service also noted that business requirements were provided to add enhancements to the processing of ITFs. The first enhancement will consolidate the ITF-received dates and claims-received dates into one chronological view to minimize effective date errors. Another enhancement will allow claims processors to add survivor data directly to the ITF screen rather than navigating to another screen within VBMS. Compensation Service reported delivering high-level requirements for both enhancements; however, these functions have yet to be implemented based on ongoing discussions regarding funding and prioritization.

Chart 1 shows the timeline from initial ITF implementation on March 24, 2015, through September 30, 2017, the end of fiscal year 2017. The chart illustrates the decrease in error rates as VBA updated procedural guidance, completed training, and added VBMS functionality to assist rating personnel with identifying ITFs in the electronic record.

Chart 1. ITF Error Rate and Related Events



Source: VA OIG analysis

Errors following ITF Banner Update

On June 13, 2017, VBA updated VBMS by creating a banner to remind staff that an ITF exists. The OIG estimated that VBA staff assigned incorrect effective dates in 1,400 of 35,200 cases (4 percent) with ITF submissions from June 13, 2017, through September 30, 2017. The error rate decreased significantly from the two previous review periods. The OIG did not consider a 4 percent error rate significant and determined that rating personnel generally followed VBA's procedures during this period.

Prior OIG Report Results

In a prior report,²³ the OIG substantiated the allegation that staff at the Chicago, Illinois, VARO assigned incorrect effective dates when they received an ITF that resulted in approximately \$5,700 in improper benefits payments. In response to the OIG recommendations, the VARO Director reported that staff identified approximately \$330,000 in underpayments from their review of 586 claims. The Director also confirmed that a quality review plan was implemented and that staff received training.

In March 2016, VBA was aware of an error trend related to effective dates and ITFs. Subsequently, in March 2017, the OIG published a report that identified the same condition at the Chicago, Illinois, VARO. VBA officials, including the Director for Compensation Service, received a copy of this report, which remains available on public websites. Despite these findings, VBA officials did not take any measures to complete a national review to ensure that veterans who submitted prior claims with ITFs received correct benefits payments. The Director's staff reported that no measures were taken because, typically, a request for such review comes through the field or from external stakeholders, based on report recommendations addressed to the Under Secretary for Benefits or to the Under Secretary for Benefits' office.

Although the OIG's current review has found improvement in the assignment of effective dates with ITFs, staff incorrectly processed an estimated 22,600 veterans' cases, resulting in inaccurate benefits payments. Most of those cases were processed from the initial ITF implementation period through the post-procedure update. The OIG believes that VBA should rework claims with ITFs to ensure veterans receive accurate benefits payments.

Improper Payments

Compensation Service's absence of standard operating procedures, inadequate procedural guidance for electronic ITF submissions, deficient and delayed mandatory training, and lack of VBMS functionality resulted in improper payments made to veterans from March 24, 2015,

²³ *Review of Alleged Use of Incorrect Effective Dates at the VA Regional Office in Chicago, Illinois* (Report No. 16-02806-182, March 31, 2017).

through September 30, 2017. In addition, Compensation Service did not take any measures to conduct a national review following VBA's identification of an error trend and similar findings discovered by the OIG at the Chicago, Illinois, VARO. On a national level, this resulted in the OIG's current findings of an estimated monetary impact of \$72.5 million in improper payments. If errors remain unidentified, veterans may not receive the correct benefits; conversely, they may receive delayed retroactive benefits to correct underpayments.

Conclusion

VBA's initial implementation of the ITF process needed strengthening. Because inadequate procedural guidance were in place at the time of the policy change, rating personnel assigned incorrect effective dates on claims for compensation benefits with an ITF. To improve accuracy, it would be beneficial for VBA to consider ITF submissions when it takes steps to modernize functionality within VBMS. As well, despite showing significant improvement, VBA still needs to expend resources to conduct a special review of veterans' claims with ITF submitted from March 24, 2015, through September 30, 2017.

Recommendations 1–2

1. The OIG recommended the Under Secretary for Benefits take steps to prioritize the modernization of functionality within the Veterans Benefits Management System to assist rating personnel with assigning correct effective dates related to intent to file.
2. The OIG recommended the Under Secretary for Benefits implement a plan to conduct a special review of claims with intent to file submissions from March 24, 2015, through September 30, 2017, during which payment changes occurred, to determine whether rating personnel assigned correct effective dates when awarding compensation benefits.

Management Comments and OIG Response

The Under Secretary for Benefits concurred with Recommendation 1, concurred in principle with Recommendation 2, and provided acceptable action plans for both recommendations.

To address Recommendation 1, Compensation Service has submitted business requirements to enhance functionality in VBMS to assist rating personnel with assigning correct effective dates related to the ITF process. VBA anticipates fully delivering the functionality in FY 2019, pending prioritization, and approval of new development efforts.

To address Recommendation 2, VBA will analyze data from a sample of claims from the specified period and determine the resource requirements for any needed remedial actions. The OIG will monitor VBA's progress and follow up on implementation of the recommendations until all proposed actions are completed.

Although the Under Secretary for Benefits agreed to implement the OIG recommendations, the Under Secretary for Benefits does not agree that most errors occurred because standard operating procedures for implementing new ITF guidance did not exist. The Under Secretary for Benefits cited guidance in:

M21-1, Procedures Adjudication Manual. The manual provides guidance on the purpose of an ITF, including how an ITF can be used to establish and assign an earlier effective date and links to a VBMS User Guide, explaining how to locate ITFs in VBMS.

VBMS User Guide. The user guide explains how to locate and utilize functionality within VBMS, including where ITF data are displayed. The VBMS User Guide is the appropriate source for guidance on how to identify ITFs.

VBMS Delta training. The training provided guidance on where to find the pertinent information. VBMS superusers from each regional office are required to attend the training and in turn, ensure the RO [Regional Office] understands/is aware of new features.

The Under Secretary for Benefits' comment that M21-1 provides guidance on the purpose of the ITF is correct. However, the overarching guidance that M21-1 provides did not initially offer rating personnel the specificity that was needed for such a far-reaching new approach to claims processing. As discussed in the report, the OIG estimated that in 15,200 of 35,400 cases (43 percent) completed from March 24, 2015, through July 21, 2016, rating personnel assigned incorrect effective dates. In most of the cases reviewed, veterans submitted ITFs either electronically or by phone and, therefore, no document corresponded to the ITF in the electronic claims folders. Veterans Service Center Managers, Supervisory Veterans Service Representatives, Compensation Service Quality Assurance, and staff stated that errors occurred because rating personnel were unaware of the location of electronic ITFs within VBMS.

The Compensation Service Acting Assistant Director for Policy told the OIG that Compensation Service had no formal procedures in place for implementing major initiatives. Instead, working groups are created for major initiatives consisting of staff specialized in quality assurance, training, or data systems. The Acting Assistant Director concluded that standard operating procedures would have been helpful. If Compensation Service had had standard operating procedures in place at the time of ITF implementation, clear guidance to ensure appropriate, complete information could have been provided to rating personnel.

The Under Secretary for Benefits' assertion that standard operating procedures were unnecessary for this critical new approach to claims processing is perplexing. Standard Operating Procedures for specific programs are frequently used by VBA to provide VBA personnel with specific, detail guidance on implementing new policy. A recent example included the National Work Queue Phases 1 and 2 Playbook, which provides consolidated guidance to support the National Work Queue implementation.

The Under Secretary for Benefits adds that the M21-1 also includes links to the VBMS users guide for rating specialists to reference. The VBMS User Guide is a technical document that provides all available features and functionality of VBMS. The OIG review found that prior to July 22, 2016, the links within M21-1 were not in sections used by rating personnel that assign effective dates. The links were located in the procedures manual providing guidance on establishment of claims and entering ITF data into VBMS, which does not pertain to the responsibilities of rating personnel.

The OIG acknowledges that VBMS Delta training was provided to superusers at regional offices and initial training (TMS 3914056) provided information that electronic ITFs are saved in the corporate record. However, based on interviews with Portland, Oregon; Oakland, California; and Waco, Texas, VARO management and staff, as well as Compensation Service Quality Assurance staff, rating personnel were unaware of the location of electronic ITF submissions. Furthermore, the OIG reviewed all the completed mandatory ITF-related training from March 2015 through March 2017. The training did not show how rating personnel would locate an electronically submitted ITF within VBMS.

The OIG made these clarifications in the report:

- On pages ii and 6 of the report, the OIG clarified a comment attributed to the Acting Assistant Directors for Policy and Procedures. The sentence now reads: “Because of these time constraints, as related to system functionality, the Acting Assistant Director for Policy stated that they produced a minimally viable product.”
- On page 4 of the report, the OIG clarified the report to state: VBA modified its ITF procedures on July 22, 2016, to include guidance and specific details on how to identify ITFs received electronically or by employees.
- On page 5 of the report, the OIG clarified the report to state: The manual procedures from March 24, 2015, through July 21, 2016, lacked details on the identification of electronic ITF submissions pertinent for rating personnel to correctly assign effective dates, despite numerous updates.

Appendix A: Background

Dissemination of the ITF Process

In September 2014, VA communicated changes in its procedures, including the new ITF process, in a press release posted on its website. The release, which indicated the changes would take effect in March 2015, stated that VA was standardizing the claims filing process to provide better service to veterans and their beneficiaries. This meant simplifying the traditional informal claims process and, by using ITFs to preserve the effective date, giving veterans or beneficiaries one year to compile the necessary documentation or evidence to support the claim.

Once the changes became effective, VA issued another press release, which appeared on its website in March 2015. This release announced that, from then on, VA required veterans seeking disability benefits to use standardized claim forms; these forms would direct veterans to state clearly the conditions for which they were seeking benefits and to provide the information necessary for VA to start processing their claims. The change was designed to help VA provide faster and more accurate decisions.

In addition, the March 2015 release stated that VA acknowledged that some veterans might need additional time to gather all the information and evidence necessary to support their claims, and therefore applicants could notify VA of their intent to file a claim in order to establish the earliest possible effective date for benefits, if determined eligible. The release also described the steps to take to submit an ITF and reiterated that VA would give individuals up to one year from the date they submit ITFs to complete the required application form.

Appendix B: Scope and Methodology

Scope

The OIG conducted its work from October 2017 through May 2018. The review covered a population of approximately 150,740 original or reopened compensation claims with ITF submissions and related payment changes, completed from March 24, 2015, through September 30, 2017.

Methodology

The OIG identified and reviewed applicable laws, regulations, VA policies, operating procedures, and guidelines related to claims with ITF submissions. The OIG obtained testimonial information related to work processes associated with claims with ITF submissions from management and staff at VBA's Central Office and the three VAROs visited. The OIG performed site visits at the Oakland, California; Portland, Oregon; and Waco, Texas, VAROs in November and December 2017.

In coordination with the VA OIG statisticians, the OIG reviewed a stratified random sample of 300 veterans' cases received on or after March 24, 2015, and completed by September 30, 2017, and determined the accuracy of effective dates with ITF submissions. Appendix C provides more details on the statistical sampling methodology.

The OIG used VBMS to review the sample veteran claims folders and relevant documentation required to assess whether staff accurately assigned effective dates with ITF submissions. The OIG discussed the findings with VBA officials and included their comments where appropriate.

Fraud Assessment

The OIG assessed the risk that fraud, violations of legal and regulatory requirements, and abuse could occur during this review. The OIG exercised due diligence in staying alert to any fraud indicators by taking actions such as:

- Soliciting the OIG's Office of Investigations for indicators
- Reviewing OIG hotline complaints and concerns for indicators

The OIG did not identify any instances of fraud during this review.

Data Reliability

The OIG used computer-processed data from VBA's Corporate Data Warehouse. To test for reliability, the team determined whether any data were missing from key fields, included any calculation errors, or were outside the time frame requested. The OIG also assessed whether the

data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Furthermore, the OIG compared veterans' names, file numbers, Social Security numbers, VARO numbers, date of claims, and decision dates as provided in the data received for the 300 claims folders reviewed.

Testing of the data disclosed that they were sufficiently reliable for the review objectives. Comparison of the data with information contained in the claims folders reviewed did not disclose any problems with data reliability.

Government Standards

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

Appendix C: Statistical Sampling Methodology

Approach

The team reviewed a statistical sample of veterans' completed cases with ITF submissions that were subject to a payment change. The OIG used statistical sampling to quantify the extent of cases in which VBA staff did not accurately assign correct effective dates for cases with an ITF submission and payment change.

Population

The review population included 150,740 veterans' compensation cases, completed from March 24, 2015, through September 30, 2017, with ITF submissions and benefits payment changes. The OIG reviewed 329 cases to identify a sample of 300 completed claims with ITF submissions. Based on this review, the estimated population totaled 137,073 cases, after excluding cases determined to be outside the scope of review.

Sampling Design

The OIG divided the universe of cases into three strata representing periods of ITF events. The OIG selected a statistical sample of 100 cases from each of the three strata for a total of 300 cases. Table 2 describes the three strata.

Table 2. Definitions of Each Stratum

Stratum	Significant ITF Event	Period
1	Initial ITF Implementation	March 24, 2015, through July 21, 2016
2	Post-procedure Update	July 22, 2016, through June 12, 2017
3	ITF Banner Update	June 13, 2017, through September 30, 2017

Source: VA OIG analysis

Weights

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

Projections and Margins of Error

The OIG used WesVar software to calculate the weighted universe estimates and associated sampling errors. WesVar employs replication methodology to calculate margins of error and

confidence intervals that correctly account for the complexity of the sample design. The margins of error and confidence intervals are indicators of the precision of the estimates. If the OIG repeated this review with multiple samples, the confidence intervals would differ for each sample, but would include the true population value 90 percent of the time. For example, 90 percent of all samples would give an estimate of the true universe of veterans' completed cases with ITFs submitted from March 24, 2015, through September 30, 2017, to range from between 133,561 and 141,345. The following tables describe this analysis and elaborate on the projected results.

Table 3 presents the estimate, margin of error, lower 90 percent confidence interval value, and upper 90 percent confidence interval value for the entire population. It also shows the review projections for estimated population, for veterans' cases with ITF submissions for Strata 1 through 3.

Table 3. Summary of Projections and Confidence Intervals for Estimated Population for Veterans' Cases with ITF Submissions

Stratum	Projection	Margin of Error	Lower Limit 90% Confidence Interval	Upper Limit 90% Confidence Interval	Sample Size
1	35,446	1,781	33,665	37,227	100
2	66,394	3,483	62,911	69,876	100
3	35,233	1,599	33,635	36,832	100
All	137,073	4,272	133,561	141,345	300

*Source: VA OIG statisticians' projection of estimated population
Data were obtained from VBA's Corporate Database.*

Table 4 shows projections for estimated cases with errors for each stratum.

Table 4. Summary of Projections and Confidence Intervals for Estimated Cases with Errors

Stratum	Projection	Margin of Error	Lower Limit 90% Confidence Interval	Upper Limit 90% Confidence Interval	Cases with Errors
1	15,242	3,023	12,219	18,265	43
2	5,975	3,182	2,794	9,157	9
3	1,409	1,153	257	2,562	4
All	22,627	8,191	20,498	30,818	56

Source: VA OIG statisticians' projection of estimated cases with errors

Data were obtained from VBA's Corporate Database.

Note: Projections do not total precisely due to rounding.

Table 5 shows projections for estimated error percentages for each stratum.

Table 5. Summary of Projections and Confidence Intervals for Estimated Error Rates

Stratum	Projection	Margin of Error	Lower Limit 90% Confidence Interval	Upper Limit 90% Confidence Interval	Cases with Errors
1	43%	8.3%	34.7%	51.3%	43
2	9%	4.8%	4.2%	13.8%	9
3	4%	3.3%	0.7%	7.3%	4
All	16.5%	3.3%	13.2%	19.8%	56

Source: VA OIG statisticians' projection of estimated error rates

Data were obtained from VBA's Corporate Database.

Table 6 shows projections for total estimated improper payments.

Table 6. Summary of Projections and Confidence Intervals for Total Estimated Improper Payments

Results	Projection	Margin of Error	Lower Limit 90% Confidence Interval	Upper Limit 90% Confidence Interval	Cases with Errors
Estimated Improper Payments	\$72,468,523	\$33,643,591	\$38,824,931	\$106,112,114	56

*Source: VA OIG statisticians' projection of total estimated improper payments
Data were obtained from VBA's Corporate Database.*

Table 7 shows projections for cases with underpayments and error rates.

Table 7. Summary of Projections and Confidence Intervals for 54 Estimated Cases in Error with Underpayments and Associated Error Rates

Results	Projection	Margin of Error	Lower Limit 90% Confidence Interval	Upper Limit 90% Confidence Interval	Cases with Errors
Number of Underpayments	21,918	4,494	17,424	26,412	54
Error Rate	96.9%	3.6%	93.2%	100%	

*Source: VA OIG statisticians' projection of estimated number of cases with underpayments and associated error rates
Data were obtained from VBA's Corporate Database.*

Appendix D: Monetary Benefits in Accordance with Inspector General Act Amendments

Recommendations	Explanation of Benefits	Better Use of Funds	Questioned Costs
1-2	The OIG estimated errors from March 24, 2015 through September 30, 2017, resulted in improper payments of \$72.5 million.	0	\$72.5 million
	Total	0	\$72.5 million

Appendix E: Management Comments

Department of Veterans Affairs Memorandum

Date: June 27, 2018

From: Under Secretary for Benefits (20)

Subj: OIG Draft Report – Review of VBA Intent to File Submissions [Project No. 2017-04919-BI-0175]

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

1. Attached is VBA's response to the OIG Draft Report: *Review of VBA Intent to File Submissions*
2. Questions may be referred to Christine Ras, Program Analyst, at (202) 461-9057.

(Original signed by)

Paul R. Lawrence, Ph.D.

Attachment

Veterans Benefits Administration (VBA)
Comments on OIG Draft Report
Review of VBA Intent to File Submissions

VBA provides the following technical comments:

Page i, paragraphs 2 and 3:

“VBA staff did not always assign correct effective dates for compensation benefits with receipt of ITFs. The OIG estimated that approximately 22,600 of 137,000 cases (17 percent) completed from March 24, 2015 through September 30, 2017, resulted in \$72.5 million in improper benefits payments. These improper payments were generally underpayments and represent the difference between the correct effective date and the one assigned. Most of the errors occurred from March 24, 2015 through July 21, 2016, during the first 16 months of VBA’s implementation of the ITF concept and decreased to a 4 percent error rate.

The OIG determined the majority of errors occurred because standard operating procedures for implementing new ITF guidance did not exist. Compensation Service Acting Assistant Director and Program Analysts for Procedures provided inadequate procedural guidance without specific details for locating electronic ITF submissions within Veterans Benefits Management System (VBMS). The Acting Assistant Director for Procedures indicated the ITF process was an initiative with a six-month implementation and delivery period.”

VBA Comment: VBA does not agree that the majority of errors occurred because standard operating procedures for implementing new Intent to File (ITF) guidance did not exist. Procedures for implementing new ITF guidance did exist in the M21-1, Procedures Adjudication Manual, particularly in M21-1, III.ii.2.C. There were other sections in the M21-1, which also contained information on ITF as it relates to other claims processing procedures. The Office of Business Process and Integration (OBPI) is responsible for the VBMS User Guide, which contains technical instructions on the functionality and usage of the VBMS system. Compensation Service does not replicate guidance from the VBMS User Guides in the M21-1. However, hyperlinks to the VBMS User Guides are provided within the M21-1 in the pertinent sections of the guidance for reference.

The M21-1 provides guidance on the purpose of an ITF, such as how an ITF can be used to establish and assign an earlier effective date. The VBMS User Guide explains how to locate and utilize functionality within VBMS, including where ITF data is displayed. The VBMS User Guide is the appropriate source for guidance on how to identify ITFs.

In addition, VBMS Delta training on new functionality provided guidance on where to find the pertinent information. VBMS superusers from each regional office (RO) are required to attend the training and in turn, ensure the RO understands/is aware of new features. This is generally the practice before each VBMS release. In addition, during initial training, instruction and guidance was provided to users that the electronic ITFs are saved in the corporate record but it did not indicate there was a document created. (See the attached TMS 3914056 job aid, pages 5-7, which was available upon initial release.)

Page ii, paragraph 1:

“Due to these time constraints, the Acting Assistant Directors for Policy and Procedures stated they produced a minimally viable product with the intention of providing comprehensive guidance in the future. Based on the insufficient detail within procedural guidance, management and staff interviewed at the three VAROs visited, stated errors occurred because they were unaware of the location of electronic ITFs within VBMS. In the majority of cases reviewed, veterans submitted ITFs either electronically or by phone, and therefore, no document corresponded to the ITF in the electronic claims folders. Therefore, rating personnel would need to know where to locate ITFs within VBMS in order to assign correct effective dates for compensation benefits.”

VBA Comment: VBA clarifies that the comment regarding, "minimally viable product" was in reference to system functionality at the time of implementation, not the procedural guidance. In addition, VBA disagrees that there was insufficient detail within procedural guidance in the field.

Page 3, paragraph 1, lines 6-11:

"The OIG determined errors generally occurred due to the comprehensive implications to VBA's policy and procedures and the short time frame to implement the initiative. Standard operating procedures did not exist and procedural guidance lacked details for locating electronic ITF submissions within VBA's electronic claims processing system, the Veterans Benefits Management System (VBMS). As such, rating personnel did not consider the date VA received an ITF when assigning effective dates for benefit payments."

VBA Comment: VBA does not agree that standard operating procedures did not exist and that the procedural guidance lacked details for locating electronic ITF submissions within VBA's electronic claims processing system. VBA's policy and procedural guidance on ITF were correct. Utilization of system functionality is found in the VBMS User Guide and also was reiterated in the training curriculum for users.

Page 5, paragraph 3:

"VBA modified its ITF procedures on July 22, 2016 to include how to identify ITFs received electronically or by employees. The OIG estimated that in 6,000 of 66,400 cases (9 percent), rating personnel assigned incorrect effective dates. The number of errors improved significantly during the post-procedure update period from July 22, 2016 through June 12, 2017."

VBA Comment: VBA did modify existing ITF procedures based on field feedback that errors were being made and that information could not be located. Comprehensive procedural guidance on ITF was provided in the M21-1 with more granularity of detail and specificity than other procedural guidance on other topics in the M21-1. VBA fine-tuned existing procedural guidance on ITF by including information that was already provided in training and user guides as an extra measure of quality in order to address field issues and errors. VBA also modified existing procedural guidance in the M21-1 to address field issues more expeditiously than re-training personnel as shown by when the ITF refresher training was conducted.

Page 5, paragraph 4, lines 1-8:

"VBA's Compensation Service Procedures did not have a standard operating procedure when implementing guidance. Interviews with Compensation Services' Acting Assistant Director for Policy and Acting Assistant Director for Procedures revealed they had a separate, formal process for approval of new policies and procedures. The Acting Assistant Director for Procedures stated that the concurrence process begins after procedures are drafted. However, they could not provide the OIG with standard operating procedures. Without standard operating procedures in place dictating the steps that are required when creating a new procedure, one can leave out key information or fail to address the appropriate claims processors for a given policy."

VBA Comment: VBA does not agree with the above assessment. VBA had a long-standing process that aligned with the standard operating procedure that is currently used. VBA also provided OIG with a detailed flow chart that explained the concurrence process that was in place at the time of implementation.

Page 6, paragraph 2:

"Compensation Service Procedures' lack of standard operating procedures when implementing ITF guidance contributed to a high error rate. However, due to a significant decrease in errors identified subsequent to the initial implementation of ITF, we made no recommendation for improvement in this area."

VBA Comment: VBA does not agree that a high error rate occurred due the lack of standard operating procedures for implementing new ITF guidance. Procedures for implementing new ITF guidance did exist

in the M21-1, particularly in M21-1, III.ii.2.C. There were other sections in the M21-1, which also contained information on ITF as it relates to other claims processing procedures.

Page 6, paragraph 3, lines 1-6:

“VBA’s Compensation Service Acting Assistant Director and Program Analysts for Procedures provided inadequate procedural guidance associated with ITF submissions. The manual procedures from March 24, 2015 through July 21, 2016, lacked details on the identification of electronic ITF submissions, despite numerous updates. These updates provided clarification of previous procedures, relocation of sections of the guidance, or deletion of older instructions from earlier versions.

VBA Comment: The M21-1 provides procedural guidance on claims processing and adjudication. It is not a resource or repository to store content on system functionality. The business systems’ user guides provide such content; in this case, the VBMS User Guide (see attached page 175 of March 2015 version of VBMS User Guide). Therefore, VBA does not agree that the manual procedures from March 24, 2015, through July 21, 2016, lacked details on the identification of electronic ITF submissions since it is not appropriate for the M21-1 to contain this information.

Page 6, paragraph 4, lines 1-6:

“An interview with the Acting Assistant Director for Procedures revealed that ITF was an initiative with a time-period of six months to implement and deliver a product. The official stated the initiative had comprehensive implications to VBA’s policy and procedures and six months was not enough time to produce sound guidance. Due to time constraints, the Acting Assistant Directors for Policy and Procedures stated they produced a minimally viable procedure with the intention of providing comprehensive guidance in the future.”

VBA Comment: This statement is inaccurate. VBA clarifies that the comment regarding “minimally viable procedure” was in reference to system functionality at the time of implementation, not the procedural guidance. In addition, VBA disagrees that there was insufficient detail within procedural guidance in the field. VBA produced guidance that was reflective of the change in regulations and training materials. User guides also provided additional information. The M21-1 provides procedural guidance on claims processing and adjudication. It is not a resource or repository to store content on system functionality for which a user guide is the appropriate source. Therefore, VBA proposes the following revision:

“An interview with the Acting Assistant Director for Procedures revealed that ITF was an initiative with a time-period of six months to implement and deliver a product. The official stated the initiative had comprehensive implications to VBA’s policy and procedures and six months was not enough time to produce a seamless process. Due to time constraints, the Acting Assistant Directors for Policy and Procedures stated they delivered guidance based on a minimally viable system product.”

Page 10, paragraph 5, lines 1-4:

“VBA’s initial implementation of the ITF process needed strengthening. Due to the lack of standard operating procedures and inadequate procedural guidance provided at the time of the policy change, rating personnel assigned incorrect effective dates on claims for compensation benefits with an ITF.

VBA Comment: VBA does not agree with the assessment above. Comprehensive procedural guidance on ITF was found and provided in the M21-1 with more granular detail and specificity than other procedural guidance on other topics in the M21-1.

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

Recommendation 1: The OIG recommended the Under Secretary for Benefits take steps to prioritize the modernization of functionality within Veterans Benefits Management System to assist rating personnel with assigning correct effective dates related to intent to file.

VBA Response: Concur. Compensation Service has submitted high-level business requirements to enhance functionality in the Veterans Benefits Management System (VBMS) to assist rating personnel with assigning correct effective dates related to intent to file (ITF). This enhancement will allow users to consolidate the ITF received dates and claims received dates into one chronological ordered view in order to minimize the effective date errors.

VBA anticipates fully delivering the functionality in fiscal year 2019, pending prioritization and approval of new development efforts; however, we are unable to provide a target completion date at this time.

Recommendation 2: The OIG recommended the Under Secretary for Benefits implement a plan to conduct a special review of claims with intent to file submissions from March 24, 2015 through September 30, 2017 in which payment changes occurred, to determine whether rating personnel assigned correct effective dates when awarding compensation benefits.

VBA Response: Concur in principle. VBA will analyze a sample of claims with ITF submissions received between March 24, 2015, and September 30, 2017, in which payment changes occurred. VBA will analyze the data from this sample and determine the resource requirements for any needed remedial actions. VBA will then develop and implement a plan by January 31, 2019.

Target Completion Date: January 31, 2019.

Note: Additional documentation to support information in the response was provided to the OIG; however, due to the length of these documents, the OIG did not include these documents in this report.

For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.

Contact and Staff Acknowledgments

Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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Review Team	Nora Stokes, Director Yolanda Dunmore Kyle Flannery Tyler Hargreaves Kerri Leggiero-Yglesias Lisa Van Haeren
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