



US DEPARTMENT OF VETERANS AFFAIRS OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS HEALTH ADMINISTRATION

Potential Weaknesses Identified in the VISN 20 Personnel Suitability Program

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QUALITY STANDARDS

The Office of Inspector General (OIG) has released this issue statement to provide information on matters of concern that the OIG has gathered as part of its oversight mission. The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation.



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC 20001



April 23, 2024¹

MANAGEMENT ADVISORY MEMORANDUM

TO: Under Secretary for Health
Veterans Integrated Service Network (VISN) 20 Director

FROM: Larry Reinkemeyer, Assistant Inspector General for Audits and Evaluations
VA Office of Inspector General's Office of Audits and Evaluations (52)

SUBJECT: Potential Weaknesses Identified in the VISN 20 Personnel Suitability Program

During a recent audit of the Veterans Health Administration's (VHA) personnel suitability program, a team from the VA Office of Inspector General (OIG) received a whistleblower complaint alleging that untrained human resources officials from Veterans Integrated Service Network (VISN) 20 were overturning pre-screening determinations. The complaint included an example of one specific case in which a candidate who was initially found unsuitable was subsequently advanced for hiring.² The complainant later provided supplemental documentation that identified four additional candidates who were initially found unsuitable for federal employment, but those determinations faced further scrutiny by VISN 20 human resources personnel. VHA hired two of these five candidates in 2023.³

These candidates were preliminarily proposed as unsuitable for VA employment due to patterns of potentially disqualifying conduct, such as domestic violence and driving under the influence of alcohol, noted during the pre-screening process. The complainant further alleged that the VISN 20 human resources officials did not possess the certification obtained by completing the Office of Personnel Management (OPM) adjudicator training.⁴ VHA requires this certification for federal employees engaged in suitability screening, review, and adjudication, as discussed below in more detail.

¹ This memorandum was sent to the Veterans Health Administration on April 23, 2024, to provide the opportunity for review prior to publication.

² VA OIG, [VA's Governance of Its Personnel Suitability Program for Medical Facilities Continues to Need Improvement](#), Report No. 21-03718-189, September 21, 2023. The audit was conducted from January 2022 through July 2023. VISN 20 includes Alaska, Washington, Oregon, Idaho, and part of Montana.

³ As of March 2024, only one of the candidates was still employed by VHA.

⁴ OPM's *Fundamentals of Suitability for Suitability and Fitness Adjudicators* is a course intended for those adjudicating suitability under OPM delegation and covers the application of the criteria for personnel suitability determinations outlined in 5 C.F.R. § 731.

This memorandum sets out VISN 20’s pre-screening process and relevant requirements, and then provides the OIG’s findings to raise VHA leaders’ awareness of risks associated with the inconsistent vetting process of its personnel to determine if additional action is warranted.⁵ The OIG requests to be informed of any steps VHA takes in response. No further action is being taken by the OIG at this time.

Personnel Suitability Process and Requirements

All VA employees are evaluated and determined suitable for work through a background investigation process. Before VA initiates the investigation, applicants or appointees must submit to a pre-screening process and receive an interim suitability determination (referred to in this memorandum as a pre-screening determination).⁶ VA policy states, “An effective pre-screening process is essential to the identification and resolution of suitability or fitness issues early in the application process, prior to the initiation of the required investigation.” Pre-screening involves the review of applications, position descriptions, and other employment-related documents, such as the Declaration for Federal Employment form (OF 306), as well as the results of the fingerprint special agreement check.⁷

When an applicant accepts a tentative offer for employment, they submit the OF 306. This form allows the applicant to self-report information related to past or ongoing legal violations, prior terminations of employment, and delinquent federal debt. Suitability staff compare the applicant’s responses and the relevant position descriptions to determine if the reported information could disqualify the applicant from being employed. A federal regulation requires agencies to consider the following factors when reviewing an applicant’s suitability for employment: misconduct or negligence in employment; criminal or dishonest conduct; material, intentional false statements, or deception or fraud in the examination or appointment; alcohol abuse that may interfere with duties or pose a threat to property or safety without evidence of substantial rehabilitation; illegal use of drugs without evidence of substantial rehabilitation; and other bars from lawful federal employment. The agency should also determine the relevance of and consider such factors as the nature of the position, the seriousness and circumstances of identified misconduct and its recency, and rehabilitation efforts.⁸ For example, if an applicant

⁵ This memorandum serves as the report of the OIG’s review to determine whether VISN 20 properly referred personnel suitability determinations for review and to evaluate regional controls over the program. The OIG issues management advisory memoranda when exigent circumstances or areas of concern are identified by OIG hotline allegations or in the course of its oversight work, particularly when immediate action by VA can help reduce further risk of harm to veterans or significant financial losses. Memoranda are published unless otherwise prohibited from release or to safeguard protected information.

⁶ 5 C.F.R. § 731.101 (2020). According to the regulation, an applicant refers to “a person who is being considered or has been considered for employment.” An appointee refers to “a person who has entered on duty and is in the first year of a subject-to-investigation appointment.” For readability, “applicant” in this memorandum refers to both.

⁷ VA Handbook 0710, *Personnel Security and Suitability Program*, May 2, 2016.

⁸ 5 C.F.R. § 731.202 (2020).

reported a recent conviction for procurement fraud, that information may disqualify them from a position as a contract specialist. However, this type of issue might not affect their candidacy for a custodial worker position.

The applicant also completes a special agreement check. VA obtains the applicant's fingerprints and submits them for a Federal Bureau of Investigation criminal history check. This check provides a degree of assurance that the individual is not subject to an ongoing inquiry and does not have a prior criminal conviction that could affect suitability for the requested position. Fingerprinting should generally be completed before employment but must occur within five days of the employee's entrance on duty date.⁹ Similar to the OF 306 screening, if this check revealed information that would disqualify an individual from the position, then VA could decide to rescind the tentative offer by issuing a non-selection letter or remove the employee if they have been onboarded. If suitability staff's review of the pre-screening information is favorable, then the applicant's background investigation can be initiated through the Defense Counterintelligence and Security Agency. When VA receives the results of the investigation from this agency, suitability staff then adjudicate the information and render a final suitability determination.

Several VA offices have responsibility for governing and executing the department's suitability program. Appendix A describes these offices and the organizational structure. VA policy establishes that VHA will maintain responsibility for field operation of its suitability program.¹⁰ VHA's Personnel Security and Suitability Program Policy requires VISNs to ensure that investigations are conducted in a timely manner and adjudications are made within the required time frames.¹¹ VISN personnel security staff perform pre-screening tasks, initiate background investigations, and adjudicate closed investigations. VHA's personnel suitability oversight is conducted by the Personnel Security Program Office within Workforce Management and Consulting (WMC).

VA policy also states that under secretaries, assistant secretaries, and other key officials will ensure an effective pre-screening and adjudicative process for their entities.¹² However, as detailed in this memorandum, the OIG found that VA policy did not prescribe specific procedures for unfavorable pre-screening determinations.

VHA's personnel suitability policy also did not establish procedures for reviewing pre-screening determinations, to include designating responsible officials, setting procedures to resolve

⁹ VA Handbook 0710. The entrance on duty date is when the employee takes their oath of office, which is their first day of work.

¹⁰ VA Handbook 0710.

¹¹ VHA Workforce Management and Consulting, *Personnel Security and Suitability Program Policy*, rev. February 2020. VHA divides the United States into 18 regional networks, known as VISNs, which manage day-to-day functions of medical centers and provide administrative and clinical oversight.

¹² VA Handbook 0710. The handbook does not define "other key officials" by specific position.

disagreements, or establishing required documentation to support determinations.¹³ VHA’s directive does state that “Federal employees who perform work as suitability adjudicators, or are responsible for suitability screening or review, must be certified to do so. Certification is granted upon successful completion of OPM’s Essentials of Suitability Adjudication Program (ESAP) or equivalent course.”¹⁴

What the OIG Found

While assessing the merits of the allegation and reviewing the supporting documentation, the OIG team determined that VISN 20 human resources officials reversed an adjudicator’s original unfavorable pre-screening determination in two of the five instances described in the complainant’s documents, but these actions alone did not violate VA policy. The OIG also confirmed that these officials did not complete the OPM adjudicator training. Their decision to be involved in reviewing suitability determinations made it necessary that they be trained to do so according to VHA policy.

The OIG team also identified inconsistencies in managing and monitoring the pre-screening process that constitute potential risks to VHA’s suitability program. The absence of specific, policy-driven procedures for the pre-screening process allowed regional human resources offices to develop their own methods. Variations in approach, supervision, and accountability can decrease VHA’s assurance that pre-screening decisions are made in the best interest of VA and the veterans it serves. Additionally, the lack of a clear monitoring program for cases with significant issues where the applicant’s pre-screening results have indicators of potentially disqualifying conduct limits VHA’s ability to detect trends in adjudicative decisions that can undermine VA’s mission.¹⁵

VISN 20 Established Regional Pre-Screening Review Procedures

In the absence of detailed national guidance, regional human resource offices—such as in VISN 20—have the latitude to establish their own processes. According to VISN 20 staff, their process begins when the adjudicator reviews pre-screening information and makes an interim determination. If the adjudicator’s determination is favorable, the case is sent to personnel in the staffing service to complete the hiring action, leading to an initiation of a background investigation.

¹³ VHA Directive 0710, *VHA Personnel Security and Suitability Program*, October 11, 2018.

¹⁴ VHA Directive 0710.

¹⁵ A significant issue is defined as an issue “present in any case involving violent felony convictions, registration obligations (such as sex offenders regardless of the registrant’s current status), elder or patient abuse, pending charges, probation, parole, or any other conduct where the potential for nexus exists.” VHACOPERSEC Advisory 19-02, *Significant Issue Notification*, October 11, 2018, rev. July 7, 2022.

If the adjudicator’s determination is unfavorable, the case file can progress through up to five layers of supervisory review: (1) personnel security supervisor, (2) the personnel security chief, (3) the associate human resources officer, (4) the deputy human resources officer, and (5) the chief human resources officer. If all parties agree with the unfavorable determination, the chief human resources officer will sign and issue a non-selection letter, resulting in the applicant not moving forward in the hiring process.

However, if any party within the review chain disagrees with the adjudicator’s unfavorable determination, they will provide justification for disagreeing and send the case file back to the adjudicator. The adjudicator then uploads documentation of the supervisory review to the system of record and changes the determination to favorable.¹⁶

Figure 1 details VISN 20’s review and approval process for suitability determinations during the pre-screening process.

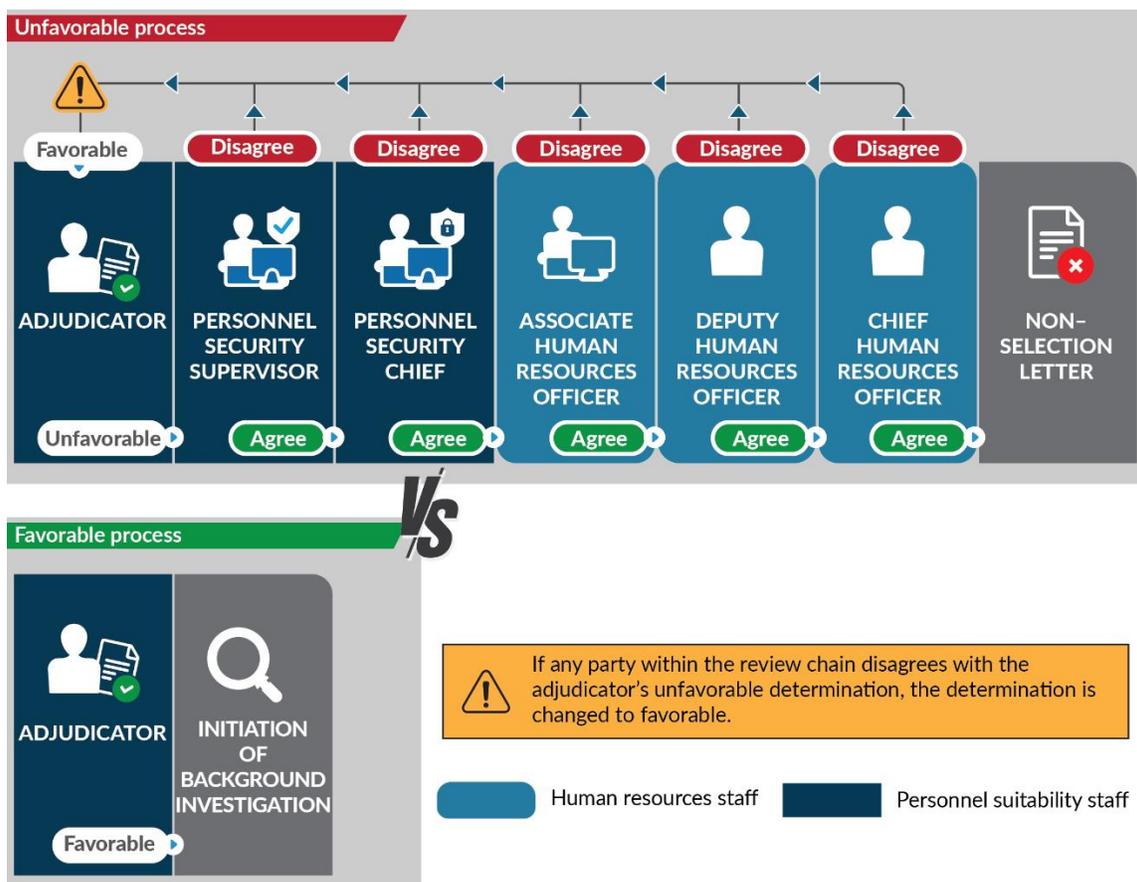


Figure 1. Pre-screening non-selection compared with approval process.

Source: OIG analysis of VISN 20 adjudication review process.

¹⁶ VA’s system of record for personnel suitability information, including pre-screening, is the VA Centralized Adjudication Background Investigation System.

To track the progression of cases, VISN 20 developed a cover sheet documenting the adjudicator's suitability determination and justification for the decision. The cover sheet also documents the various levels of supervisory review and concurrence or nonconcurrence with the suitability decision. A VISN 20 human resources official told the team that this document is the "method of record." Beyond the cover sheet, VISN 20 did not establish written procedures governing the pre-screening process, which could include assigning roles, establishing supporting documentation required during the review, and resolving disagreements about suitability determinations between personnel security staff and human resources supervisors.

VISN 20 Human Resources Officials Overturned Two Unfavorable Pre-Screening Determinations

The OIG team reviewed the five cases included in the complainant's documents in which an adjudicator made unfavorable pre-screening determinations and recommended not hiring the applicant due to disqualifying information identified during pre-screening. In two of the cases, the team found that VISN 20 human resources officials overturned the adjudicator's recommendation and hired the candidates:

- In the first case, the adjudicator cited VHA policy and suggested it stated that individuals with violent felony convictions are ineligible for employment.¹⁷ A human resources official disagreed with the adjudicator's decision based on the applicant's disclosure of the conduct and evidence of rehabilitation.¹⁸
- In the other case, the adjudicator cited the same VHA policy and noted that the individual in question was on probation at the time they applied for a position in VISN 20.¹⁹ A human resources official disagreed with the pre-screening determination based on evidence of rehabilitation and stated the conduct in question did not relate to the duties of the position.

The advisory cited in each overturned case established requirements for notifying VHA's Personnel Security and Credentialing Program Office of cases with significant issues, such as violent felony convictions and probation, that are adjudicated favorably.²⁰ However, the review team determined that the policy does not preclude the VISN from subsequently hiring these individuals.

¹⁷ VHACOPERSEC Advisory 19-02.

¹⁸ Felony convictions alone do not bar an applicant from federal employment. 5 C.F.R. 731.202 requires agencies to consider multiple factors based on the conduct in question, the nature of the position, and efforts toward rehabilitation.

¹⁹ VHACOPERSEC Advisory 19-02.

²⁰ VHA's Personnel Security and Credentialing Program Office is a component of WMC.

Although VISN 20 human resources officials reversed an adjudicator’s original unfavorable pre-screening determinations, as alleged, the OIG concluded these actions did not violate VA policy. The OIG team did note that VISN 20 did not comply with the significant issue notification advisory requiring reporting such cases with favorable decisions to VHA’s Personnel Security and Credentialing Program Office. Neither case was reported to the program office, despite both meeting the criteria for notification. The risk associated with the lack of significant issues reporting is discussed later in this memorandum.

In addition, as described below, the OIG found that

- staff involved in suitability screening or review did not take required training for carrying out their pre-screening duties, and
- officials used inconsistent procedures for executing and monitoring the process, due to unclear policies being implemented across VISNs and guidance on notifications of significant issues that would benefit from more detailed direction.

VISN 20 Human Resources Officials Did Not Complete Training Required for Reviewing Suitability Determinations

As noted previously, VISN 20’s review process for pre-screening determinations involved both personnel security staff and human resources officials. After a personnel security supervisor and personnel security chief have reviewed and approved an unfavorable pre-screening determination, additional assessments are conducted by the chief human resources officer, the deputy human resources officer, and an associate human resources officer before non-selection letters are sent to applicants. The OIG team determined that none of the human resources officials involved with reviewing personnel suitability cases completed the OPM suitability training as of October 2023. Although VHA employees who do not work as suitability adjudicators or review determinations would generally be exempt from the training requirement, the human resources officials’ review of suitability cases holds them to this standard.

The deputy director of VHA’s Human Resources Center of Expertise office, acting as WMC’s personnel security director, shared the importance of the suitability training with the OIG team.²¹ The deputy director pointed to VHA Directive 0710 that explicitly requires certification for staff who review suitability determinations. The VHA policy states, “Suitability determinations within VHA must be conducted in a reasonable and consistent manner by adjudicators trained to OPM standards.”²² The policy further clarifies, “Federal employees who perform work as suitability adjudicators, or are responsible for suitability screening or review, must be certified” through

²¹ When the VHA personnel security director position is filled, the deputy director of VHA’s HR Center of Expertise will supervise that position.

²² VHA Directive 0710.

OPM’s course or an equivalent.²³ Per this language, the OIG concluded that human resources officials responsible for reviewing suitability determinations, such as those in VISN 20, must receive OPM or equivalent suitability training.²⁴

Variance in Procedures and Oversight Pose Potential Risks to VHA’s Suitability Program

While assessing the merits of the allegation in VISN 20, the OIG team noted gaps in the policies governing the pre-screening process that may warrant attention by VA leaders. These gaps led to inconsistent procedures for executing and monitoring the process. Regional human resources offices—such as VISN 20—have had discretion to establish their own pre-screening review procedures. Inconsistent processes across VISNs, however, diminish VHA’s assurance that pre-screening decisions are uniform nationwide. Further, the OIG determined that the WMC significant issue notification process, required by policy and intended to monitor adjudicative trends, was not only unclear but also inconsistently executed.

Pre-Screening Review Processes Varied at Other Benchmarked VISNs

As noted previously, neither VA nor VHA policy prescribed specific procedures for reviewing unfavorable pre-screening determinations and thus allowed regional human resources offices discretion to form their own methods. Because the VISN 20 human resources office established its own process to address that policy gap, the review team interviewed personnel security chiefs at three other networks to determine if pre-screening cases were handled similarly.²⁵ The three regions’ review processes all differed, and the personnel security chiefs could not produce documentation of procedures for the pre-screening process, as discussed in examples 1 through 3 below:

- **Example 1.** Only suitability staff are involved in the VISN’s review and approval process. The personnel security chief stated that once the adjudicator makes an unfavorable determination, the supervisory personnel security specialist reviews the case file. If the supervisor agrees with the unfavorable determination, the case is presented to the personnel security chief who, upon concurrence, issues the non-selection letter.

²³ VHA Directive 0710.

²⁴ The VISN 20 chief human resources officer provided the OIG evidence in February 2024 demonstrating that the VISN had requested the training for the human resources officials noted in this memorandum. However, a Human Resources and Administration/Operations, Security, and Preparedness (HRA/OSP) official told the team in April 2024 that VA prioritized placing personnel security specialists in the course and there were no remaining openings for the rest of the fiscal year.

²⁵ The team judgmentally selected three other networks: VISNs 1, 8, and 10.

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- **Example 2.** Following the adjudicator’s unfavorable pre-screening determination, the supervisory personnel security specialist reviews the case file. If the supervisor concurs, the case is presented to the senior strategic business partner of the applicant’s VA medical facility.²⁶ Upon concurrence, the business partner signs the non-selection letter. However, if the business partner disagrees, the VISN associate human resources officer requires the business partner to sign a document taking responsibility for hiring the applicant.
 - **Example 3.** The personnel security chief reviews the adjudicator’s unfavorable pre-screening determination. If they concur, the case proceeds to the chief human resources officer for review. If the chief human resources officer concurs, they sign the non-selection letter. The personnel security chief explained that the chief human resources officer has never disagreed with a determination.

The Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government* require that managers design policies, procedures, techniques, and mechanisms to achieve objectives and respond to risks.²⁷ Although the approaches adopted by VISN 20 and the three benchmarked VISNs do not violate requirements, the wide variance in approach, supervision, and accountability may undercut not only the uniformity of determinations across the administration but also VA’s objective to hire individuals suitable for the positions to which they are applying.

The examples above illustrate how the official accountable for signing the letter following an unfavorable pre-screening determination varied across the VISNs. The review team noted that VHA’s Human Capital Management office took action in September 2023 to broadly outline the process flow for pre-screening and to assign the chief human resources officer as the signatory for the non-selection letter.²⁸ Additionally, the process flow shows that the VISN suitability office should review reports, draft non-selection letters, and adjudicate investigations. However, the process flow does not include any supervisory reviews for unfavorable pre-screening determinations, which are at issue in this memorandum.

²⁶ Senior strategic business partners were previously referred to as facility human resources officers, and they report directly to VISN chief human resources officers.

²⁷ GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

²⁸ Veterans Health Administration–Human Capital Management, *Process Standard – Personnel Security*, September 22, 2023. The VHA Human Capital Management office is the parent office to WMC. See the organizational chart (figure A.1) in appendix A.

WMC’s Significant Issue Notification Process Is Unclear

VHA policy requires each VISN to notify WMC quarterly of its favorable adjudications for cases with a “significant issue” for review.²⁹ A significant issue involves convictions for violent felonies, sex offender registration, abuse of patients or elders, pending criminal charges, probation, parole, or other conduct potentially relevant to the job for which the candidate has applied.³⁰ The OIG determined that VISNs did not consistently submit notices, and WMC did not formally establish a method of submission for notifications and did not monitor trends.

VISNs Did Not Consistently Submit Notifications to WMC

WMC’s Personnel Security Program Office has three consultants who provide advisory services to personnel security staff in all 18 VISNs, with each servicing six VISNs. These consultants provided the OIG team documentation demonstrating that 13 of 18 VISNs did not send notifications of any cases with significant issues in a two-year period from October 1, 2021, through September 30, 2023 (review period). One VISN reported 10 significant issue cases to WMC during that time.

For VISN 20, the responsible WMC consultant identified only one significant issue reported during the review period. That case was not one of the five the OIG team reviewed when assessing the allegation. Further, although two cases in the allegation met the standard for reporting to WMC due to the issues at hand, VISN 20 officials did not report them.

WMC Did Not Formally Establish a Method to Submit Significant Issue Notices

VHA did not establish a standardized method for VISNs to transmit quarterly significant issue notices. The VHA advisory states that WMC will provide “formatting instructions” for the quarterly notification to the VISN suitability coordinators in a separate notice.³¹ Although WMC officials told the review team that the VISN staff were informed about the advisory, they could not provide documentation to support communicating the submission method.

Without a formal process for communicating these cases, one suitability coordinator explained that they would discuss the cases during a phone call with their assigned WMC consultant. In

²⁹ VHACOPERSEC Advisory 19-02. The October 2018 version of the advisory required VISNs to refer all favorably adjudicated significant issue cases to WMC before the applicant entered on duty. The advisory was updated in July 2022 to only require a quarterly notification to WMC, which could occur after the applicant reported for duty.

³⁰ VHACOPERSEC Advisory 19-02.

³¹ VHACOPERSEC Advisory 19-02. VHA Directive 0710 states that the VISN chief human resources officer is designated as the VISN suitability coordinator but can delegate these responsibilities. The OIG team identified instances in which this role had been delegated to the personnel security chief.

another VISN, the suitability coordinator submitted these cases via memoranda and emails. These reporting inconsistencies can make it more difficult to track significant issue cases.

In December 2023, the acting VHA personnel security director told the review team that WMC had informally communicated formatting guidance to the VISNs and that the office plans to standardize the routing of these cases in the future.

WMC Did Not Monitor Trends for Significant Issue Notifications

The advisory states that significant issue notices allow "...VHA [central office] to monitor adjudicative trends in cases where VA's mission is at risk due to the presence of conduct or ongoing court obligations that a reasonable person would deem unacceptable in a clinical setting."³² However, the review team did not identify evidence of WMC analyzing trends using the significant issue notices. One consultant stated that the VHA group does not track significant issue data. Another consultant admitted that the VHA group should be aggregating the notices collected and analyzing trends, but they are not.

Unless the VISNs notify WMC of significant issue cases, VHA has limited knowledge of adjudicative trends that could place VA's mission at risk. This inhibits VHA's ability to take corrective action to ensure newly hired employees are suitable for interacting with veterans, their families, and other staff.

Conclusion

The pre-screening process is critical to reviewing applicants' history for recent concerning or criminal events. Lack of formal procedures, training, and significant issue notifications inhibit VHA efforts to ensure staff do not pose a threat to people, sensitive information, or resources, and are suitable for carrying out the duties of the position for which they are being considered.³³ Failures in vetting personnel can increase risk to veterans, personnel, and visitors at healthcare facilities nationwide.

The OIG requests that VHA provides information on what action, if any, is taken to mitigate the issues and potential risks identified in this memorandum and the outcome of those actions. These include any efforts to enforce requirements and clarify guidance governing processes for pre-screening, training for personnel adjudicating and reviewing pre-screening cases, and submitting significant issue notices to WMC.

³² VHACOPERSEC Advisory 19-02.

³³ Hearing on Background Checks: Are VA's HR Failures Risking Drug Abuse and Veteran Harm?, *Before the Subcommittee on Oversight and Investigations, House Committee on Veterans' Affairs*, 118th Cong. (December 6, 2023). The OIG participated in a congressional hearing discussing previous OIG published reports on deficiencies in VA's personnel suitability program.

VA Management Comments and OIG Response

The under secretary for health responded that the VHA Office of Human Capital Management is “updating current Pre-Screening process maps and job aids to identify the final decision-maker in the Human Resources (HR) chain of command for significant issues and findings requiring elevated review.” Additionally, the under secretary stated that VHA completed deployment of an oversight and compliance plan in which suitability coordinators audit casework during a second-level review for both quality and consistency. The OIG acknowledges VHA’s efforts to establish decision-making roles and improve the review process for suitability coordinators. Appendix B contains the full text of the under secretary’s response.

Appendix A: Offices Responsible for VA's Personnel Suitability Program

Several VA leaders have responsibility for the department's suitability program, with the assistant secretary for Human Resources and Administration/Operations, Security, and Preparedness (HRA/OSP) at the highest level. According to VA guidance, this position has the authority to establish and maintain personnel suitability programs throughout the department consistent with applicable laws, rules, regulations, and executive orders.³⁴

As illustrated in figure A.1, the Office of Identity, Credential, and Access Management, under HRA/OSP, is responsible for developing, coordinating, and overseeing the implementation of policy, programs, and guidance for the department's suitability program. A suboffice, Personnel Security and Credential Management, is required to conduct oversight and functional program reviews to evaluate compliance and implementation of the handbook's requirements.³⁵

Each of the three VA administrations—the Veterans Health Administration (VHA), the Veterans Benefits Administration, and the National Cemetery Administration—is required to appoint a personnel security program manager to coordinate departmental regulations and policies involved with the overall personnel security and suitability program.³⁶ According to VA guidance, the under secretary for health must ensure that VHA complies with personnel suitability policies and procedures.³⁷ The under secretary is also required to establish and maintain an effective suitability and fitness determination program using automated processes while taking actions to address and correct conditions that are noncompliant with regulatory guidance.³⁸ VHA's personnel suitability oversight is conducted by the Personnel Security Program Office within Workforce Management and Consulting (WMC).

Finally, VHA's Personnel Security and Suitability Program Policy requires Veterans Integrated Service Network (VISN) personnel security chiefs to ensure that investigations are conducted in a timely manner and adjudications are made within the required time frames.³⁹

Figure A.1 provides an overview of VA's organizational structure for governance of the personnel suitability program.

³⁴ VA Directive 0710, *Personnel Security and Suitability Program*, June 4, 2010.

³⁵ VA Handbook 0710. The handbook specifies requirements for (1) checking fingerprints within timelines, (2) initiating and adjudicating background investigations, (3) uploading investigation documentation into an employee's personnel file, and (4) updating data systems with relevant information.

³⁶ VA Handbook 0710.

³⁷ VA Directive 0710.

³⁸ VA Handbook 0710.

³⁹ VHA Workforce Management and Consulting, *Personnel Security and Suitability Program Policy*, rev. February 2020.

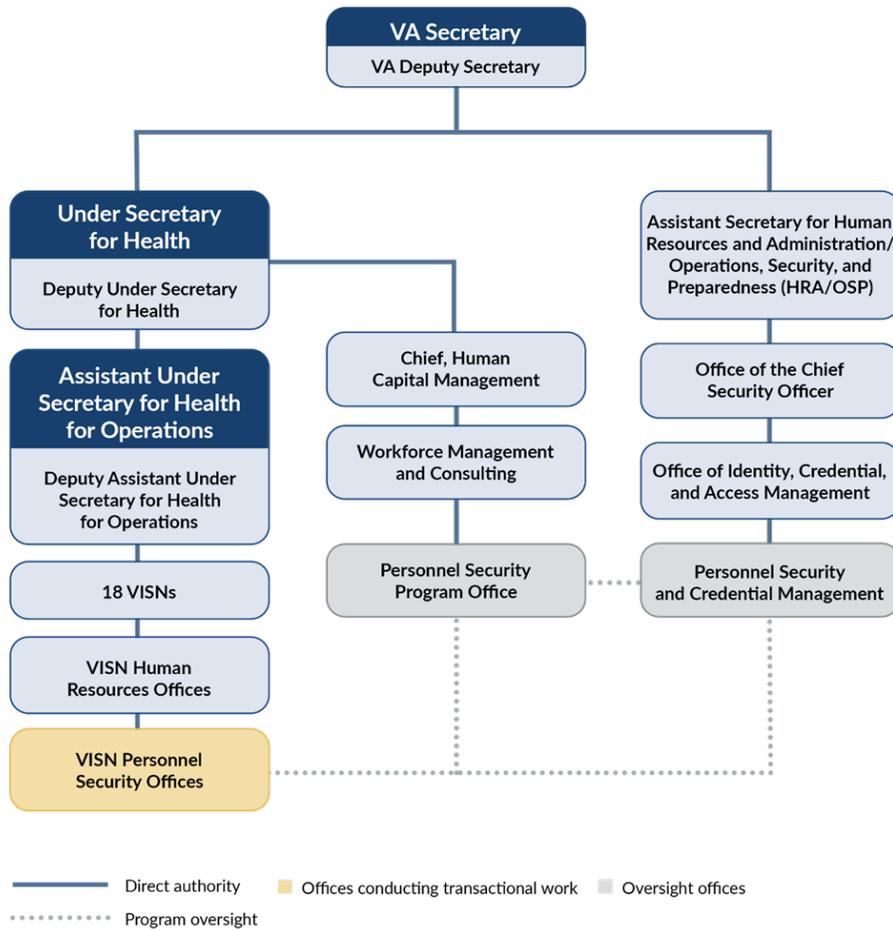


Figure A.1. Overview of VA’s organizational structure for governance of the personnel suitability program.

Source: *OIG analysis of organizational charts, VA and VHA policy, and VHA websites and position descriptions.*

Note: As shown in this chart, VA guidance assigns responsibility to offices and, at other times, specific positions.

Appendix B: Under Secretary for Health Management Comments

Department of Veterans Affairs Memorandum

Date: May 14, 2024

From: Under Secretary for Health (10)

Subj: Office of Inspector General (OIG) Management Advisory Memorandum (MAM), Potential Weaknesses Identified in the Veterans Integrated Service Network (VISN) 20 Personnel Suitability Program (VIEWS 11705381)

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

1. Thank you for the opportunity to review and comment on OIG's MAM on the VISN 20 Personnel Suitability Program.
2. The Veterans Health Administration Office of Human Capital Management (HCM) is updating current Pre-Screening process maps and job aids to identify the final decision-maker in the Human Resources (HR) chain of command for significant issues and other findings requiring elevated review. HCM will monitor adoption of the changes using the existing Personnel Security oversight and compliance program.
3. In March 2024, HCM completed deployment of a VISN and program HR offices-level oversight and compliance plan. Suitability Coordinators now audit casework during a second level review for quality and consistency.

The OIG removed point of contact information prior to publication.

(Original signed by)

Shereef Elnahal, M.D., MBA

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

OIG Contact and Staff Acknowledgments

Contact	For more information about this management advisory memorandum, please contact the Office of Inspector General at (202) 461-4720.
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Team	Shawn Steele, Director Cherelle Claiborne Michael Derick Mary Dickerson Brendon Gregoire Jason Ingold Justin Kerly Kristin Nichols Angela Sanders Noak Smith Aaron Weinberg
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Other Contributors	Victoria Eatherton Jill Russell
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