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OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS BENEFITS ADMINISTRATION

Review of VBA's Unidentifiable Mail Certification Process

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Executive Summary

The VA Office of Inspector General (OIG) conducted this review to determine whether the Veterans Benefits Administration (VBA) accurately certified unidentifiable mail packets from July 2018 through March 1, 2025. The team also reviewed additional mail packets from June to July 2026 to determine if accuracy concerns identified during the initial review persisted.

For veterans' benefits to be awarded, claimants must submit a complete application on a prescribed form. On June 23, 2026, VBA announced plans to reduce the application from 15 pages to five pages. It is unknown if this change will impact VBA's efforts to minimize unidentifiable mail. VA processes this application and all other documents it receives as a "mail packet." When VBA staff cannot match a veteran's submitted documents—including both physical and electronic copies—for disability compensation, pension, or other benefits to their electronic claims folder, the mail packet is certified as unidentifiable. When this certification is applied incorrectly, veterans, their beneficiaries, or other claimants might be underpaid or their claims may be delayed, denied, or missed altogether.

The OIG estimated that VBA staff improperly certified about 21 percent of mail packets as unidentifiable and that veterans and other claimants could have been underpaid at least a combined $822,000 since July 2018. However, more underpayments likely exist than what the team estimated because some errors the team identified could result in monetary impact once VBA processes the claims. Additionally, because VBA employees did not always follow the process in VA's *Adjudication Procedures Manual* when labeling mail as unidentifiable, the VA Secretary could not ensure all evidence of record was considered as required by 38 U.S.C. § 5107 and could not ensure claimants received help in obtaining the evidence necessary to substantiate claims for benefits in line with 38 U.S.C. § 5103A. While VBA initiated efforts to improve unidentified mail certification procedures during the OIG's review, additional mail packets reviewed from June to July 2026 showed no significant changes to the OIG's original findings.

The OIG team briefed VBA officials on the preliminary results and recommendations of this review in December 2025 and February 2026. Based on the OIG's findings, VBA began expediting contract employees' access to the Compensation and Pension Record Interchange (CAPRI). This system allows users to view Veterans Health Administration records that can help identify a claimant, thereby potentially reducing the number of packets being certified as unidentifiable. Because VBA has taken action to mitigate this risk, the OIG offered no related recommendation.

The OIG made five recommendations to the under secretary for benefits to mitigate the risk of benefits-related mail being improperly certified as unidentifiable. In July 2026, the principal deputy under secretary for benefits, performing the delegable duties of the under secretary for benefits, concurred with four recommendations and concurred in principle with the

fifth recommendation. VBA indicated it was actively working on all recommendations with proposed completion dates between September 2026 and July 2027. The OIG will continue to monitor these plans.

What the Review Found

Based on the sample results, the OIG estimated that approximately 35,100 of more than 164,000 unidentified mail packets in the Centralized Mail Portal from July 2018 through March 1, 2025, were incorrectly certified as unidentifiable even though the packets contained enough information to identify claimants. As a result, veterans and other claimants were likely underpaid. Furthermore, the OIG estimated that about 19,900 mail packets contained potential impact errors. Potential impact errors are those that could have affected a claimant's benefits but did not result in improper payments. Finally, the OIG estimated that nearly all reviews of unidentifiable mail packets did not follow all established procedures, including claims assistants not documenting actions taken to identify the mail and not archiving unidentified mail as required by VA's *Adjudication Procedures Manual*.

These errors occurred in part because VBA staff did not always complete all required actions when certifying unidentified mail and did not always have access to the systems and resources necessary to identify claimants. Furthermore, quality reviews of claims assistants' work did not include unidentifiable mail. Therefore, the OIG concluded that VBA's quality review process did not thoroughly evaluate the certification of unidentifiable mail, contrary to VA Manual M21-4 requirements. Errors also occurred because VBA staff had not received specific training. Although the *Adjudication Procedures Manual* provides guidance, none of the required VBA training courses include instruction on how to identify or process unidentified mail. Without a dedicated course on this topic, VBA cannot ensure staff understand how to process such mail accurately.

Until VBA addresses the concerns identified in this report and follows the guidelines in the *Adjudication Procedures Manual*, improper mail certifications may continue, which could lead to further underpayments and delayed or missed claims for veterans and claimants.

Next Steps

The OIG will continue to monitor VBA's corrective actions and will close the recommendations when VBA provides sufficient evidence that it has addressed the risks identified in this report.

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Introduction

The mission of the Veterans Benefits Administration (VBA) is "to provide benefits and services to Veterans, their families, and survivors in a responsive, timely, and compassionate manner in recognition of their service to the Nation."[1] These benefits and services include disability compensation, pension, life insurance, education and training programs, loans, and access to VA healthcare services.

According to 38 U.S.C. § 5101, claimants—the beneficiaries who submit a claim for veterans' benefits—must submit a complete application on a prescribed form for these benefits to be awarded. On June 23, 2026, VBA announced plans to reduce the application from 15 pages to five pages. It is not yet known how this change will impact VBA's efforts to minimize unidentifiable mail. VA processes all documents it receives through the Centralized Mail Portal as a "mail packet," which can include multiple documents or pieces of evidence. If VBA staff cannot identify the associated claimant from these documents, they certify the mail packet as unidentifiable. In 2025, VA received over nine million mail packets, and nearly 69,000 packets were diverted to VBA staff for manual review. Of these, about 30 percent (20,750) lacked identifying information and were ultimately certified as unidentifiable.

From 2018 through 2025, more than 198,000 mail packets were certified as unidentifiable by VBA. Figure 1 shows the distribution of unidentifiable mail across calendar years.

Figure 1. *Total amount of unidentifiable mail by calendar year.*

Source: VA OIG analysis of Centralized Mail Portal data.

The VA Office of Inspector General (OIG) conducted this review to determine whether VBA staff accurately certified mail packets sent through the Centralized Mail Portal as unidentifiable.

Mail Processing

VA's Centralized Mail Program uses the US Postal Service, contractors, automation, and VBA employees to process mail. Since 2012, VBA has worked to streamline its claims processing by digitizing and automating mail to improve efficiency and reduce processing time. In 2014, VBA expanded its mail receipt and processing services. Multiple contracts initially valued at over $89 million in 2022 were used to support mail automation and mail conversion. As of May 2026, these contracts have grown in excess of $629 million.[2]

[1] VA, *VA Functional Organization Manual,* vol. 1: *Administrations*, ver. 8, 2023.

[2] VA contract, *Mail Management Services*, September 19, 2022; VA contract, *VA Benefits Transformation Platform*, April 21, 2023.

VA receives mail in both physical and digital formats. Physical materials include paper mail (bulk mail, US Postal Service pickup and delivery, and other delivery services), CDs, DVDs, and flash drives. Digital materials include direct uploads by claimants or third parties, email, and fax. Mail packets often consist of an application for benefits and these physical or digital materials, which serve as documentation for a claim for benefits.

Centralized Mail Portal

The portal is the main tool of the Centralized Mail Program; it manages incoming physical and digital mail and automates key processes. According to VA's *Adjudication Procedures Manual*, the goal of the portal is to

- eliminate paper handling by VBA staff at regional offices;
- reduce the number of times mail is handled in any format;
- expedite the uploading of claims, evidence, and other documents to electronic claims folders;
- improve customer service and claims processing timeliness through better mail control; and
- implement a first-in, first-out workflow for all received mail.[3]

Although the portal is designed to streamline mail processing, not all mail can be processed automatically, especially if mail is unidentifiable. Figure 2 illustrates an overview of mail processing.

[3] VA Manual M21-1, "Overview of CM [Centralized Mail] Process," December 7, 2016, topic II.i.1.A.1.a in *Adjudication Procedures Manual*.

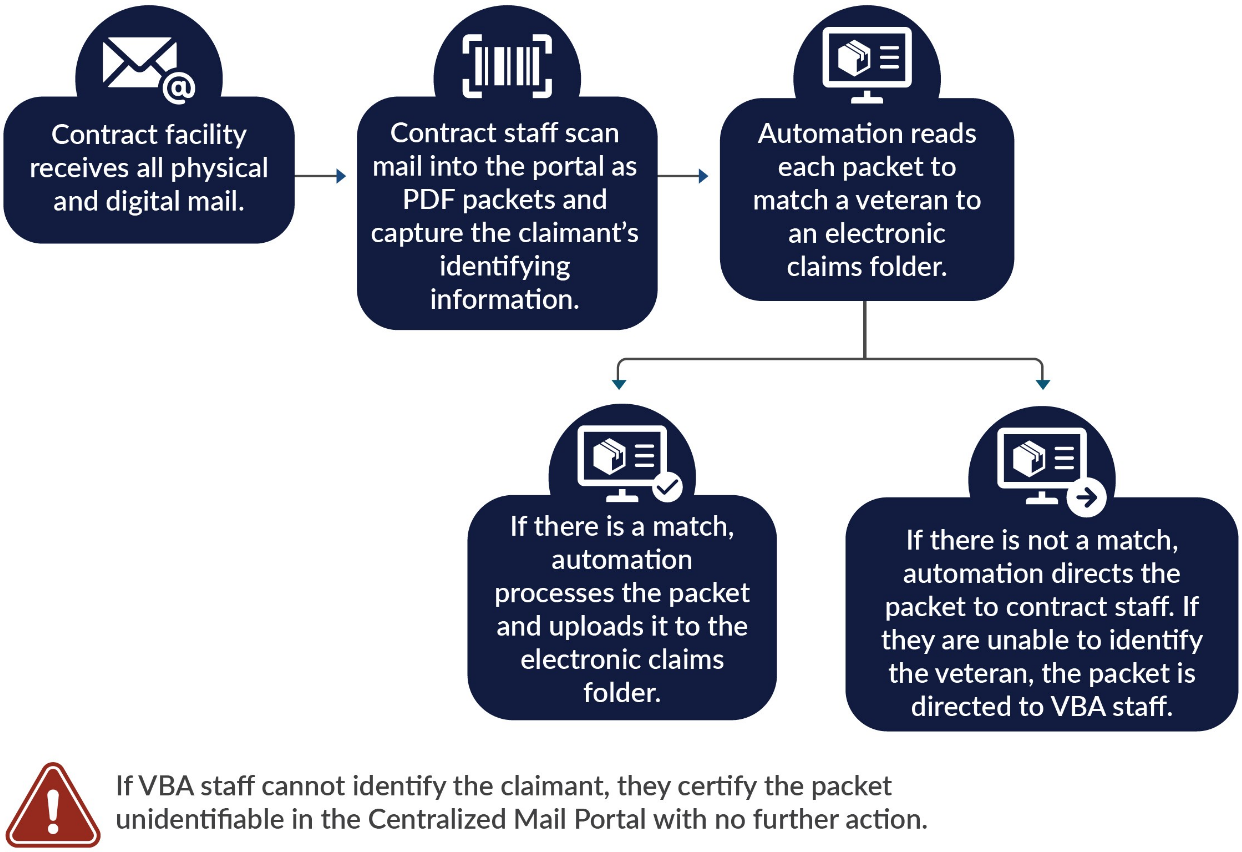

***Figure 2**. General process for unidentifiable mail.*

Source: VA OIG analysis of VBA's unidentifiable mail process.

Note: During this review, contracted staff were provided with access to the Compensation and Pension Records Interchange, which allows them to potentially identify packets without having to direct them to VBA staff.

When automation lacks the necessary information to (1) conclusively identify an individual, (2) associate the correspondence with an existing electronic claims folder, or (3) create a new electronic claims folder, the mail packet is diverted for manual review. Automation directs unidentifiable mail packets to contracted support staff first. However, contracted staff cannot certify mail as unidentifiable, so these mail packets are ultimately routed to VBA staff for examination.

VBA staff examine both the mail and related VA systems for any clues that could help identify a claimant. VA's *Adjudication Procedures Manual* states that, before concluding a mail packet is unidentifiable, staff must certify they have searched all appropriate systems.[4] These systems include Veterans Benefits Management System (VBMS), Compensation and Pension Record Interchange (CAPRI), and Beneficiary Identification Records Locator Subsystem. Furthermore,

[4] VA Manual M21-1, "Handling Unidentifiable Mail," January 8, 2024, topic II.i.2.C.5 in *Adjudication Procedures Manual*. Despite revisions to the *Adjudication Procedures Manual* during the review period, the underlying guidance did not change in meaning.

the manual states that if staff do not have "access" to a system identified above, an individual who does should be consulted to attempt to identify the veteran.[5]

If staff cannot identify the claimant from these resources but a phone number for the claimant is included in the mail packet, they are supposed to attempt to call the claimant. If the only available identifying information present is a return address, staff must send a letter to the listed address. According to the *Adjudication Procedures Manual*, staff must add notes in the portal detailing which systems were accessed and documenting any attempts to contact the claimant by telephone or letter.[6] These notes should indicate whether identifying information is present and list the systems used to attempt to identify the veteran. If, after review, the claimant still cannot be identified, the manual requires staff to self-certify within the portal that they have completed the necessary steps and that the mail in question has decidedly been marked as unidentifiable.

The manual also says supervisors must then repeat the same steps as their staff before making their own certification. Finally, a records management officer reviews the document to confirm both the employee and supervisor certifications. The manual states, if a match is not found, the mail is to be archived after a one-year retention period. Based on the OIG team's review, VBA updated the manual on June 17, 2026, removing the archiving requirement so that unidentifiable mail packets now remain viewable in the portal indefinitely after a records management officer approves them.

Quality Review Process

Under 38 U.S.C. § 7731, the VA Secretary is required to carry out a quality assurance program in VBA. In alignment with this statutory mandate, VA Manual M21-4 establishes detailed requirements for reviewing and analyzing all elements involved in processing a specific claim or issue.[7] These reviews must use a standardized quality review checklist to ensure consistency and structure.

The claims assistant quality review checklist prescribed in VA Manual M21-4 includes four major review areas with 30 subsections, one of which addresses the handling of unidentified mail packets and returned mail. The checklist is designed to ensure that all aspects of claims establishment—such as accurately identifying the claimant and updating required systems—are completed correctly.

[5] VA Manual M21-1, "Handling Unidentifiable Mail," January 8, 2024, topic II.i.2.C.5.b in *Adjudication Procedures Manual*.

[6] VA Manual M21-1, "Handling Unidentifiable Mail," January 8, 2024, topic II.i.2.C.5.b.

[7] VA Manual M21-4, "Fundamentals of Quality Review," chap. 6.4 in *The Manual,* November 26, 2024.

Results and Recommendations

Finding: Errors Occurred by VBA Staff During the Unidentifiable Mail Certification Process

Based on the sample results, the OIG estimated that approximately 35,100 of more than 164,000 unidentified mail packets in the Centralized Mail Portal as of March 1, 2025, were incorrectly certified as unidentifiable despite containing sufficient information to identify the claimant. As a result, the OIG estimated that veterans and other claimants have been underpaid at least $822,000 since July 2018. While VBA initiated efforts to improve unidentified mail certification procedures during the OIG's review, additional mail packets reviewed from June to July 2026 showed errors similar to those found during the initial review period.

The OIG estimated, based on the sample results, that 19,900 mail packets contained potential impact errors. Potential impact errors are those that could have affected a claimant's benefits. Although underpayments have not occurred yet in these cases, these potential errors could result in monetary impact once VBA processes the related claims. Furthermore, for an estimated 97 percent of unidentifiable mail packets, VBA staff did not follow all established procedures.

Improper certifications occurred in part because some VBA staff had not obtained access to systems and resources necessary to identify mail packets. They also occurred because of not receiving consistent quality reviews and limited training. Until VBA addresses the concerns identified in this report, there is limited assurance that the VA Secretary is considering all evidence of record and helping claimants in obtaining the evidence necessary to substantiate a claim for benefits—which is statutorily required under 38 U.S.C. §§ 5107 and 5103A. Additionally, mail packets may continue to be incorrectly certified as unidentifiable, which will cause veterans and other claimants to continue to receive underpayments, delayed benefits, denial of benefits, or have their claims missed altogether.

The OIG findings are based on unidentifiable mail packet errors that included monetary impacts and potential impacts to veterans and other claimants, as well as procedural deficiencies. It is also based on concerns the team identified regarding the unidentifiable mail certification process, quality reviews, and training.

What the OIG Did

The OIG team reviewed a sample of mail packets certified as unidentifiable from July 2018 through March 2025. The population totaled about 182,000 unidentifiable mail packets. The team excluded about 17,000 packets of returned mail, reducing the total to over 164,000 mail packets. From this population, the review team used stratified sampling to select and examine 269 mail packets from the portal's unidentifiable mail queue. This total sample of 269 packets comprised four strata including random samples of mail packets with high-risk documents that could affect disability benefits as well as separate random samples of mail packets consisting of all other documents. The team determined that disability compensation applications, DD214 records, dependency applications, service treatment records, individual unemployability applications, and private medical records were high-risk mail packets; all other documents were not considered high risk for the purposes of this review. The team also reviewed a selected sample of additional mail packets from June to July 2026 to determine if accuracy concerns identified during the initial review persisted.

To assess the accuracy of mail classified as unidentifiable, the OIG team reviewed applicable laws, regulations, policies, procedures, and contracts related to unidentifiable mail and VBA's broader mail-handling process. The team also conducted interviews at the VBA central office in Washington, DC and site visits to the Centralized Mail Intake facility in Janesville, Wisconsin, and VBA regional offices in Houston, Texas; Atlanta, Georgia; and Chicago, Illinois.

Appendix A details this review's scope and methodology, while appendix B provides more information on statistical sampling.

Unidentifiable Mail Packets

As noted, the OIG estimated about 21 percent of unidentified mail packets were identifiable as of March 1, 2025. The OIG team briefed VBA officials on the initial results of this review in December 2025 and shared the identified errors with them in January 2026. The team met with these officials again on February 25, 2026, to discuss the review's final results and potential recommendations. The errors resulted in monetary impacts and potential impacts, as well as procedural deficiencies, as explained in the sections that follow.

Monetary Impact to Veterans and Other Claimants

Based on the OIG's statistical analysis, the review team estimated that at least 190 impact errors were identified resulting in underpayments of at least a combined $822,000 due to mail processing errors.[8] The following example describes a situation where mail was improperly certified as unidentifiable, and this resulted in an underpayment to a veteran.

Example 1

A Vietnam era veteran submitted an application for disability compensation and included military discharge documents and medical records in support of a claim related to prostate cancer on June 20, 2023. These documents were erroneously marked as unidentifiable in the portal on June 28, 2023.

The mail packet containing the veteran's application, discharge documents, and medical records included identifying information such as a social security number

[8] Appendix C details the monetary impacts the OIG identified, in accordance with the Inspector General Act.

and date of birth. Therefore, VBA staff should have established the veteran’s electronic folder at that time.

On February 9, 2024, the veteran submitted an “Intent to File” and, on February 21, 2024, submitted another application for compensation for prostate cancer. On April 23, 2024, VBA staff granted the veteran a 100 percent disability evaluation effective February 9, 2024.

It appears that the veteran was underpaid approximately $34,782 because VBA did not grant an effective date of June 20, 2023, the date the veteran first applied for disability compensation benefits. Rather, the veteran was granted an incorrect effective date of February 9, 2024, based on the date VBA received his “Intent to File.”

Potential Impact to Veterans and Other Claimants

More underpayments likely occurred beyond the approximately $822,000 that the OIG estimated. The review team estimated that about 19,900 unidentified mail packets contained potential impact errors that could have changed the benefits decision if VBA had processed them correctly. Potential impact errors are those that could have affected the claimant’s benefits but did not result in improper payments. While underpayments have not occurred yet in these cases, they could result in monetary impact once VBA processes the claims.

Notably, an estimated 3,800 mail packets included claim forms that could have resulted in new or increased benefit awards if VBA staff had not missed them. Other potential impact errors involved missed opportunities to grant entitlement to additional benefits, such as education assistance. The following example describes a situation where improperly certifying mail as unidentifiable resulted in a claim never being decided by VBA.

Example 2

A Vietnam era veteran submitted an application for disability compensation for a lower back condition, high blood pressure, and diabetes due to Agent Orange exposure. VBA received the application on February 21, 2019. On his application, the veteran reported his military service dates and treatment at the VA medical center in Jackson, Mississippi.

Notes provided in the Centralized Mail Portal show the veteran was sent a letter requesting proof of military service, even though an employee certified they had reviewed the Compensation and Pension Record Interchange (CAPRI). This interchange is a widely used VBA application that enables staff to select a specific Veterans Health Administration facility and access a veteran’s medical records and identifying information (such as proof of service). In other words, the employee requested information they easily could have obtained without the *additional request to the veteran—information that would have prevented the mail packet from being certified as unidentifiable. However, the employee, a supervisor, and a records management officer all incorrectly certified the mail packet as unidentifiable.*

The OIG team confirmed through the interchange system that the veteran had been receiving treatment at the VA medical center in Jackson since 2007, which would have been sufficient to identify the veteran and process the claim. The OIG informed VBA of the unidentifiable mail on November 20, 2025; however, VBA did not process the claim until March 10, 2026. While no additional benefits resulted, the veteran's disability compensation claim was unnecessarily delayed by nearly seven years.

Procedural Deficiencies

The OIG team estimated that 97 percent of unidentified mail packets contained procedural deficiencies, which contributed to VBA employees' incorrectly certifying mail as unidentifiable. Procedural deficiencies do not affect benefit entitlement but may reflect noncompliance with the required steps outlined in VA policy. For example, claims assistants did not document the actions they took to identify the mail in the system notes and unidentified mail was not archived after 12 months, although both actions were required by VA's *Adjudication Procedures Manual* at the time of the review. [9] Instead, it remained in the Centralized Mail Portal.

When VBA staff do not properly identify and associate incoming mail packets with the appropriate claimant's electronic claims folder, several adverse outcomes may occur, including

- underpayments resulting from missed claims or failure to associate relevant information with the claimant's folder,
- premature denials due to the absence of critical evidence that was not linked to the claim,
- delays in benefits processing caused by missing or unrecognized documentation,
- unnecessary appeals, and
- confusion for both claimants and VBA staff.

Unidentifiable Mail Certification

During an interview with the OIG team, a supervisor reported that they certified actions for improperly certified mail packets that they had not actually performed; they said they did so

[9] VA Manual M21-1, "Handling Unidentifiable Mail," January 8, 2024, topic II.i.2.C.5.b and topic II.i.2.C.5.e in *Adjudication Procedures Manual.*

simply to meet manual requirements. The OIG team found that staff certified in the Centralized Mail Portal that they attempted to contact a claimant or their representative when contact information was available; however, one employee stated they do not document their phone calls, although it is required by the *Adjudication Procedures Manual*.[10] While the OIG acknowledges this does not necessarily mean attempts were not made, according to VBA, 40 percent of claims assistants who could be tasked with mail processing did not have phones to make necessary calls.

The OIG team found that not all VBA staff obtained access to all systems they were expected to use to identify mail. They did not note in the portal whether they accessed these systems through other means before they certified a mail packet as unidentifiable. For example, while the procedures manual requires claims assistants to access the Compensation and Pension Record Interchange, this access varied across regional offices. VBA reported 39 of 116 claims assistants did not have active access to the CAPRI interchange. Additionally, during interviews, two of four supervisors responsible for oversight of employees that perform mail packet certification duties told the OIG team they did not have access to this system. As a work-around, the manual instructs claims assistants without access to consult another employee who does have access; however, the manual does not require documentation of who completed the action.[11] Consequently, the OIG team could not determine who performed the action or whether it was completed at all. Table 1 shows VBA claims assistants' reported access to phones and access to the Compensation and Pension Record Interchange nationwide.

Table 1. National Claims Assistant Access to Phones and Compensation and Pension Record Interchange on or before March 1, 2025

Resource used to identify claimant	Number of assistants who had access	Number of assistants who did not have access	Number of assistants VBA could not determine access for*
Phone	37	47	11
Compensation and Pension Record Interchange	75	27	6

Source: VA OIG analysis of VBA national data.

** The OIG requested this information for all claims assistants who could be tasked with handling Compensation and Pension mail at the time of the review, and VBA could not provide a complete response.*

Meanwhile, the OIG team learned that during the third and final reviews, a records management officer is not required to complete the certifications steps; they need to confirm only that the first

[10] VA Manual M21-1, "Handling Unidentifiable Mail"; VA Manual M21-1, "Documenting Information Received by Telephone," December 5, 2024, topic III.i.2.D.1.e in *Adjudication Procedures Manual*.

[11] VA Manual M21-1, "Handling Unidentifiable Mail."

and second reviewers noted the process was completed. This process therefore offers VBA limited assurance that mail marked as unidentifiable truly meets that definition.

Finally, the Centralized Mail Portal does not include a place to store correspondence with claimants, such as notification letters or records of phone calls. As a result, these letters are not available to all VBA staff for unidentified mail certification or oversight. A program analyst with the Office of Field Operations said the Veterans Benefits Management System can store some correspondence related to unidentifiable mail, but there is no requirement in a VA manual to save these letters. Consequently, neither the OIG nor VBA can verify certification or that oversight actions were always done as reported.

The VA Secretary is statutorily required—under 38 U.S.C. §§ 5107 and 5103A—to consider all evidence of record and help claimants in obtaining evidence necessary to substantiate a claim for benefits. When claims and supporting materials submitted by veterans or their representatives are certified as unidentifiable, they cannot be considered in assessing the claim. Because VBA employees did not follow VA’s *Adjudication Procedures Manual* when labeling mail as unidentifiable, VBA could not ensure all records submitted were considered consistent with the Secretary’s statutory duties.

To reduce the risk of mail being incorrectly certified as unidentifiable, VBA should update the *Adjudication Procedures Manual* to require documentation of each specific action taken, improve processes and guidance to ensure all employees who process unidentified mail have access to all systems and resources necessary to identify a claimant, and implement a plan to ensure all Veterans Benefits Administration contact and correspondence with claimants is documented and stored as required by the *Adjudication Procedures Manual*. As part of this plan, ensure documentation is easily accessible to appropriate staff. Based on the OIG team’s review, VBA updated the manual on June 17, 2026, to remove archiving requirements, and unidentifiable mail packets now remain viewable in the portal indefinitely following records management officer approval.

Quality Reviews

As previously noted, according to 38 U.S.C. § 7731, the VA Secretary is required to carry out a quality assurance program in VBA. VA Manual M21-4 requires a review of claims assistants’ work using a checklist to ensure all aspects of claims establishment—such as correctly identifying the claimant and updating systems—are completed accurately.[12] According to VBA, a total of 6,084 quality reviews for claims assistants were conducted in fiscal year 2025. Of these, VBA reported that 208 reviews specifically pertained to mail packet processing. The OIG team determined none of the 208 quality reviews were specific to unidentifiable mail. During

[12] VA Manual M21-4, “Standard of Review for IQRs [Individual Quality Reviews]” chap. 6.5.c in *The Manual,* November 26, 2024; VA Manual M21-4, “CA [Claims Assistants] Review Elements” chap. 6, app. C in *The Manual*, change date March 30, 2023.

interviews, claims assistants confirmed they had not received quality reviews related to unidentified mail. Therefore, OIG concluded VBA’s quality reviews did not include unidentifiable mail.

The OIG team also found inconsistencies in how work credits were documented, which affected quality reviews. Each action a claims assistant completes to move a claim forward is assigned a credit value based on national performance plans, and claims assistants are expected to maintain productivity to ensure timely service for claimants. Under the national performance plan, claims assistants are assigned credit for processing unidentified mail to track correspondence. VBA reported claims assistants self-report their production. However, when they provide inaccurate information, those items—such as work credits—are excluded from quality review.

During interviews, five of 15 claims assistants reported not taking any work credit and one claims assistant reported being unsure of what credit to take when processing unidentified mail. Both supervisors and claims assistants were unable to provide a consistent response regarding the appropriate work credit for unidentified mail under the national performance plan. Confusion related to the work credit was confirmed in the analysis of the 208 quality reviews, as 135 of the reviews used the unidentified mail work credit to document unrelated work. As a result, VBA lacks assurance that claims assistants would receive quality reviews on unidentified mail packets.

If the quality review process is not strengthened, claims assistants will continue to improperly certify mail as unidentifiable in the portal, leading to delays and missed claims for veterans and other claimants. To increase program effectiveness, VBA should ensure all claims assistants who process unidentified mail receive consistent quality reviews specific to their handling of unidentified mail.

Training on Unidentifiable Mail

While the OIG acknowledges that the *Adjudication Procedures Manual* provides guidance on the process for certifying mail as unidentifiable, some VBA staff reported not receiving specific training on this process—which contributes to staff improperly certifying mail packets as unidentifiable. A chief of the training curriculum told the OIG team that national training is disseminated to the field by the Office of Field Operations, but they were unaware of any training specific to unidentifiable mail. Some claims assistants the OIG team spoke with said such training would be beneficial.

Although Compensation Service is tasked with developing training curricula, none of the required training courses provide instruction on how to identify or process unidentified mail. The OIG team reviewed existing training curriculum and found it focuses on claims processing. The available training did not include guidance on the various search methods available to identify mail. The OIG determined that without a dedicated training curriculum on unidentified mail, VBA cannot ensure staff understand how to process such mail accurately, perpetuating the risk of improper certification.

VBA should improve processes and guidance by implementing a mandatory training module on processing unidentified mail, including guidance on appropriate work credit for claims assistants, and incorporate it into the national training curriculum. This training should be required for all personnel involved in mail processing, including supervisors and records management officers.

Contractors' Access to the Compensation and Pension Record Interchange

While this OIG review focused on whether VBA staff accurately certified mail as unidentifiable, the OIG team found some contractors could not access the Compensation and Pension Record Interchange (CAPRI). Consequently, contractors sent *identifiable* mail packets to VBA staff for additional manual processing—which conflicts with the portal's goals to increase efficiency and reduce the number of times mail is handled in any format.

A program analyst reported that due to this inefficiency, VBA began expediting contracted employees' access to this system and provided them with initial training beginning in August 2025. Because VBA has taken action to mitigate this risk, the OIG offered no recommendation.

Conclusion

How VBA staff certify mail as unidentifiable has contributed to errors. VA OIG estimated that VBA staff did not follow all established procedures for almost all unidentifiable mail packets as of March 1, 2025. This resulted in an estimated $822,000 in underpayments to veterans and other claimants since July 2018. That amount is likely understated; the OIG estimated that approximately 19,900 mail packets improperly certified as unidentifiable might still result in impact errors once VBA processes the claims. These errors occurred because of limited system access, inconsistent quality control measures, and insufficient training.

Without improvements in these areas, VBA faces a significant risk of continued underpayments, delayed or denied benefits, or claims missed altogether. Addressing these deficiencies is essential to ensure that all veteran and claimant mail is handled appropriately and processed in a timely and accurate manner. Doing so would also ensure that all submitted evidence is reviewed and considered in accordance with 38 U.S.C. §§ 5107 and 5103A.

Recommendations 1–5

The OIG made the following recommendations to the under secretary for benefits.[13]

1. Update the *Adjudication Procedures Manual* to require documentation of each specific action taken when staff certify mail as unidentifiable.

[13] The recommendations addressed to the under secretary for benefits are directed to anyone in an acting status or performing the delegable duties of the position.

2. Provide all employees who process unidentified mail appropriate access to all systems and resources necessary to identify a claimant.
3. Implement a plan to ensure all Veterans Benefits Administration contact and correspondence with claimants is documented and stored as required by the *Adjudication Procedures Manual*. As part of this plan, ensure documentation is easily accessible to appropriate staff.
4. Provide claims assistants who process unidentified mail with consistent quality reviews specific to their handling of unidentified mail.
5. Consider implementing a training module on processing unidentified mail, including guidance on appropriate work credit for claims assistants, and incorporating it into the national training curriculum. This training could be beneficial for all personnel involved in mail processing, including supervisors and records management officers.

VA Management Comments and OIG Response

On July 7, 2026, the principal deputy under secretary for benefits, performing the delegable duties of the under secretary for benefits, concurred with recommendations 1 through 4 and concurred in principle with recommendation 5. For recommendation 1, VBA plans to update the *Adjudication Procedures Manual* to require detailed documentation of all actions taken when certifying mail as unidentifiable. In response to recommendation 2, VBA plans to ensure staff who handle unidentified mail have the system access they need, with designated contacts available when licenses are limited.

To address recommendation 3, VBA plans to consider that all claimant contact and correspondence be properly documented, stored, and easily accessible to staff. For recommendation 4, VBA plans to provide claims assistants who process unidentified mail with consistent, mail-specific quality reviews. Finally, for recommendation 5, VBA plans to add mandatory training on processing unidentified mail to the national curriculum, with separate guidance on appropriate work credit. The full management comments are included in appendix D.

The planned corrective actions are responsive to the intent of the recommendations. The OIG will monitor implementation of the planned actions and will close the recommendations when VA provides evidence demonstrating progress in addressing the identified issues.

Appendix A: Scope and Methodology

Scope

The VA Office of Inspector General (OIG) team conducted its work from April 2025 through June 2026 with a focus on the universe of incoming mail packets categorized as "unidentifiable confirmed" in VA's Centralized Mail Portal from July 10, 2018, through March 1, 2025. The team also reviewed additional mail packets from June to July 2026 to determine if accuracy concerns identified during the initial review persisted.

Methodology

To accomplish its objective, the OIG team reviewed applicable laws and Veterans Benefits Administration (VBA) regulations, policies, procedures, contracts, and guidelines governing the administration of mail. The team statistically sampled incoming mail packets and reviewed each sample's contents to evaluate the accuracy of its categorization as unidentifiable and noted any underpayments made due to errors. The team interviewed VBA staff for their perspectives on mail processing. Furthermore, the OIG team conducted site visits at the Houston, Texas; Atlanta, Georgia; and Chicago, Illinois VBA regional offices and the Centralized Mail Intake Facility in Janesville, Wisconsin. Finally, the team conducted interviews at the VBA central office in Washington, DC.

Internal Controls

The team assessed internal controls to determine whether they were significant to the review objective. This included consideration of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring.[14] In addition, the team reviewed the principles of internal controls associated with the objective and identified three components and four principles as significant.[15] The team identified internal control deficiencies during this review and proposed recommendations to address those listed in table A.1.

[14] Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

[15] Because the review was limited to the internal control components and underlying principles identified, it may not have disclosed all internal control deficiencies that could have existed at the time of this review.

Table A.1. VA OIG Analysis of Internal Control Components and Principles Identified as Significant

Component	Principle	Deficiency identified by this review
Control environment	4. Management should demonstrate a commitment to recruit, develop, and retain competent individuals.	Unidentified mail processing is not a mandatory part of the national training curriculum for all staff involved in mail processing.
Information and Communication	13. Management designs a process that uses the entity's objectives and related risks to identify the information requirements needed to support the internal control system.	Staff processing unidentified mail did not have access to all systems and resources necessary to identify a claimant.
	14. Management should internally communicate the necessary quality information to achieve the entity's objectives.	Staff did not document the unidentified mail they processed in a consistent manner so that quality reviewers could identify unidentified mail.
Monitoring	16. Management should establish and operate monitoring activities to monitor the internal control system and evaluate results.	Mail packets that had been certified as unidentifiable remained in the Centralized Mail Portal for more than one year after processing. Staff did not receive consistent quality reviews of unidentified mail they had processed.

Source: VA OIG analysis of internal control components and principles listed in the Government Accountability Office's Standards for Internal Control in the Federal Government.

Data Reliability

The team used computer-processed data from the VA's Centralized Mail Portal. To test for reliability, the team determined whether any data were missing from key fields, including any calculation errors, or whether data were outside the time frame requested. The team also assessed whether the mail packets contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Testing showed the data were sufficiently reliable for the audit objectives.

Comparison of data obtained by the team to information contained in VA electronic systems, including the Veterans Benefits Management System and the portal, did not disclose any problems with data reliability.

Government Standards

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*.[16]

[16] Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation*, December 2020.

Appendix B: Statistical Sampling Methodology

Approach

To accomplish the objective, the VA Office of Inspector General (OIG) team reviewed a statistical sample of veterans' mail packets categorized as "unidentifiable confirmed" in the Centralized Mail Portal from July 10, 2018, through March 1, 2025.

Population

The universe comprised 181,937 mail packets. The OIG team excluded 17,493 mail packets because they included letters VBA sent that were returned as undeliverable. As a result, the review population contained 164,444 mail packets. One out-of-scope packet was identified during sample review. This led the audit team to estimate 12 packets were outside the scope of this review in the population, therefore reducing the estimated population that met scope requirements to 164,432 mail packets.

Sampling Design

The OIG team initially selected a statistical sample of 270 records from the review population of 164,444 mail packets confirmed unidentifiable in the portal as of March 1, 2025. However, one mail packet was considered out of scope because of abnormalities in the record. As a result, the team reviewed a statistical sample of 269 records.

As shown in table B.1, the team classified mail packets into four strata according to whether the mail packets' contents constituted a high-risk form or contained other types of documents and whether the portal had information in at least two of three identifying fields, qualifying the mail item as "potentially identifiable" for the OIG review. For the purposes of stratification, a document was classified as identifiable if it included any two of the following: the veteran's first name, last name, or file number. A packet was classified as high risk if it contained documents that could affect disability benefits. The team determined that the following documents were high risk: Disability Compensation applications (VA 21-526EZ); DD214 records; dependency applications (VA 21-686c, VA 21-674 series); service treatment records; individual unemployability applications (VA 21-8940, VA 21-4140 series, or VA 21-4192); or private medical records. Mail packets with all other documents were not considered high risk for the purposes of this review.

Table B.1. Strata for Sampling Analysis

Stratum	Population size	Sample size
High risk forms(s), potentially identifiable	985	84
High risk forms(s), not potentially identifiable	3,138	75
All other forms, potentially identifiable	22,817	60

Stratum	Population size	Sample size
All other forms, not potentially identifiable	137,504	50
Total	**164,444**	**269***

Source: VA OIG statistician’s stratified population of unidentified mail data from the Centralized Mail Portal.

** This number reflects the one record removed because it was out of scope.*

The OIG team reviewed the sample records to determine whether they were in scope. Sample records that were deemed out of scope were excluded from the sample. Table B.2 shows the estimated number of in-scope and out-of-scope mail packets in the audit population.

Table B.2. Estimated In-Scope Mail Packets Based on a 90 Percent Confidence Interval

Result	Estimate number	Margin of error	Lower limit	Upper limit	Sample size
In scope	164,432	28,005	136,427	164,443	269
Out of scope	12	19	0	31	1
Total	**164,444**	—	—	—	**270**

Source: VA OIG statistician’s projection based on the team’s sample data analysis.

Weights

Samples were weighted to represent the population from which they were drawn, and the weights were used in the estimate calculations. For example, the team calculated the error rate estimates by first summing the sampling weights for all sample records that contained the given error, then dividing that value by the sum of the weights for all sample records.

Projections and Margins of Error

The projection is an estimate of the population value based on the sample. The associated margin of error and confidence interval show the precision of the estimate. If the OIG repeated this audit with multiple sets of samples, the confidence intervals would differ for each sample but would include the true population value about 90 percent of the time.

The OIG statistician employed statistical analysis software to calculate estimates, margins of error, and confidence intervals that account for the complexity of the sample design.

The sample size was determined after reviewing the expected precision of the projections based on the sample size, potential error rate, and logistic concerns of the sample review. While precision improves with larger samples, the rate of improvement decreases significantly as more records are added to the sample review.

Figure B.1 shows the effect of progressively larger sample sizes on the margin of error.

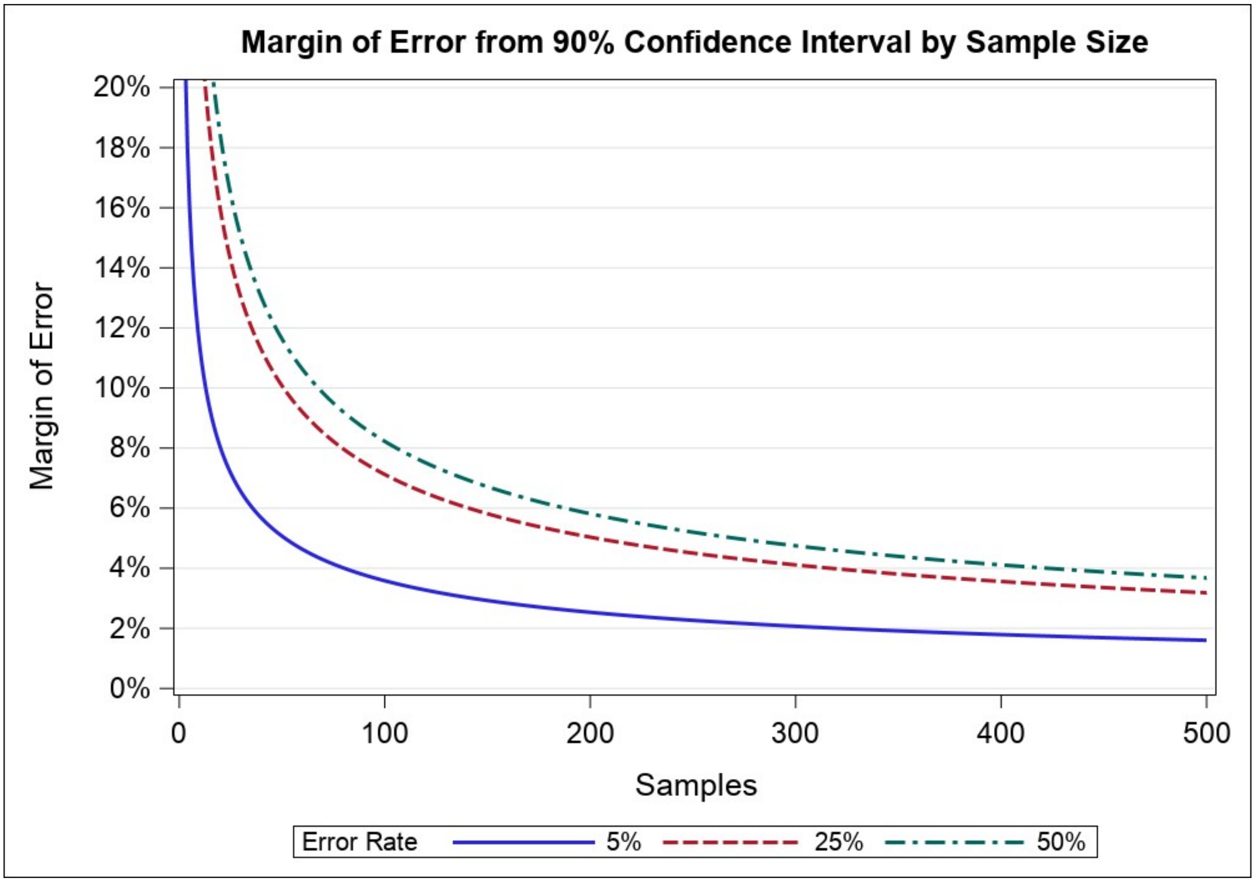

Figure B.1. *Effect of sample size on margin of error.*

Source: VA OIG statistician's analysis.

Projections

Table B.3 depicts the projected number of mail packets the OIG team estimates were identifiable in the unidentifiable mail queue as of March 1, 2025.

Table B.3. Statistical Projections Summary for Certified Unidentifiable Mail Packets That Were Identifiable, with a 90 Percent Confidence Interval

Estimate name	Estimate number	Margin of error	Lower limit	Upper limit	Sample size
Identifiable mail packets	35,055 (21%)	12,844 (8%)	22,210 (14%)	47,899 (29%)	133

Source: VA OIG analysis of Centralized Mail Portal unidentifiable mail queue data.

Table B.4 on the next page depicts the estimated total number of potential impact errors and missed claims. These claims have the potential to affect veterans' benefits after the claims are resolved.

Table B.4. Statistical Projections Summary for Potential Impact Errors, with a 90 Percent Confidence Interval

Estimate name	Estimate number	Margin of error	Lower limit	Upper limit	Sample size
Missed claim	3,831 (2%)	1,748 (1%)	2,082 (1%)	5,579 (3%)	63
Potential impact errors	19,912 (12%)	10,246 (6%)	9,666 (6%)	30,157 (18%)	73

Source: VA OIG analysis of Centralized Mail Portal unidentifiable mail queue data.

Table B.5 depicts the estimated number of procedural deficiencies associated with unidentifiable mail.

Table B.5. Statistical Projections Summary for Procedural Deficiencies, with a 90 Percent Confidence Interval

Estimate name	Estimate number	Margin of error	Lower limit	Upper limit	Sample size
Procedural deficiency	158,834 (97%)	27,920 (3%)	130,914 (94%)	164,408 (100%)	234

Source: VA OIG analysis of Centralized Mail Portal unidentifiable mail queue data.

Table B.6 presents the projected underpayments associated with mail that was incorrectly certified as unidentifiable as of March 1, 2025.

Table B.6. Estimated Underpayments, with a 90 Percent Confidence Interval

Estimate name	Estimate amount	Margin of error*	Lower limit	Rounded lower limit	Sample size
Decisions resulting in underpayments	$2,640,334	$1,817,866	$822,468	$822,000	13

Source: VA OIG statistician’s analysis.

* *Because the audit team reports a one-sided confidence interval, the margin of error is calculated as the difference between the estimate and lower limit for the confidence interval.*

Note: Projections and confidence intervals may not total precisely due to rounding.

Due to low sample counts, the point estimate in table B.6 is highly variable. Consequently, the team conservatively reported the one-sided lower bound in the finding that is associated with the 90 percent confidence interval.

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

Recommendation	Explanation of Benefits	Better Use of Funds	Questioned Costs[17]
1–5	The VA Office of Inspector General (OIG) estimated that VA underpaid veterans and other claimants by at least $822,468 for mail packets confirmed as unidentifiable from July 10, 2018, through March 1, 2025.	$0	$822,468
	Total	**$0**	**$822,468**

[17] The OIG questions costs when VA action or inaction (such as spending or failure to fully compensate eligible beneficiaries) is determined by the OIG to violate a provision of law, regulation, contract, grant, cooperative agreement, or other agreement; when costs are not supported by adequate documentation; or when they are expended for purposes that are unnecessary or unreasonable under governing authorities. Within questioned costs, the OIG must, as required by section 405 of the IG Act, report unsupported costs. Unsupported costs are those determined by the OIG to lack adequate documentation at the time of the audit. Of the at least $822,468 in questioned costs, none were identified as unsupported costs.

Appendix D: VA Management Comments

Department of Veterans Affairs Memorandum

Date: July 7, 2026

From: Under Secretary for Benefits (20)

Subj: Office of Inspector General (OIG) Draft Report – Review of VBA's Unidentified Mail Certification Process [Project No. 2025-02228-AE-0089]

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

1. Thank you for the opportunity to review and comment on the OIG draft report: Review of VBA's Unidentifiable Mail Certification Process. The Veterans Benefits Administration (VBA) provides the attached response to the draft report.

The OIG removed point of contact information prior to publication.

(Original signed by)

J. Margarita Devlin

Principal Deputy Under Secretary for Benefits

Performing the Delegable Duties of the Under Secretary for Benefits

Attachment(s)

Attachment

Veterans Benefits Administration (VBA)
Comments on OIG Draft Report
Review of VBA’s Undeniable Mail Certification Process
[Project No. 2025-02228-AE-0089]

VBA concurs with OIG’s draft report findings and provides the following responses to the recommendations:

Recommendation 1: Update the Adjudication Procedures Manual to require documentation of each specific action taken when staff certify mail as unidentifiable.

VBA Response: Concur. VBA will update the Adjudication Procedures Manual to require more detailed documentation of each specific action taken when staff certifies mail as unidentifiable.

Target Completion Date: 09/30/2026

Recommendation 2: Ensure all employees who process unidentified mail have access to all systems and resources necessary to identify a claimant.

VBA Response: Concur. VBA will ensure all employees who process unidentified mail have access to all systems and resources necessary to identify a claimant. For systems with limited licenses, VBA will ensure employees have designated points of contact to perform unidentified mail verification activities.

Target Completion Date: 10/30/2026

Recommendation 3: Implement a plan to ensure all Veterans Benefits Administration contact and correspondence with claimants is documented and stored as required by the Adjudication Procedures Manual. As part of this plan, ensure documentation is easily accessible to appropriate staff.

VBA Response: Concur. VBA will implement a plan to ensure all Veterans Benefits Administration contact and correspondence with claimants is documented and stored as required by the Adjudication Procedures Manual, and ensure documentation is easily accessible to appropriate staff.

Target Completion Date: 09/30/2026

Recommendation 4: Ensure claims assistants who process unidentified mail receive consistent quality reviews specific to their handling of unidentified mail in accordance with 38 U.S.C. § 7731.

VBA Response: Concur. VBA will ensure claims assistants who process unidentified mail receive consistent quality reviews specific to their handling of unidentified mail.

Target Completion Date: 7/1/2027

Recommendation 5: Implement a mandatory training module on processing unidentified mail, including guidance on appropriate work credit for claims assistants, and incorporate it into the national training curriculum. This training should be required for all personnel involved in mail processing, including supervisors and records management officers.

VBA Response: Concur in principle. VBA will implement a mandatory training module on processing unidentified mail in the national training curriculum for all personnel involved in mail processing. Guidance on appropriate work credit will be communicated to personnel separate from the mandatory training module.

Target Completion Date: 1/31/2027

The text of VA's management comments is reprinted verbatim as received from the department. For accessibility, the original format of this appendix has been modified to comply with section 508 of the Rehabilitation Act of 1973, as amended.

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