

STATEMENT OF  
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FOR THE RECORD

UNITED STATES HOUSE OF REPRESENTATIVES  
COMMITTEE ON VETERANS' AFFAIRS

WITH RESPECT TO

**“Assessing the VA IT Landscape: Progress and Challenges”**

WASHINGTON, DC

FEBRUARY 7, 2017

MR. CHAIRMAN AND MEMBERS OF THE COMMITTEE:

On behalf of the men and women of the Veterans of Foreign Wars of the United States (VFW) and our Auxiliary, thank you for the opportunity to offer our thoughts on the progress and challenges we see in the Department of Veterans Affairs' Information Technology (VA IT) landscape.

Historically, VA has faced significant challenges in developing and deploying state-of-the-art IT systems. Throughout the agency's history we have seen stops and starts that have brought about significant innovation, only to see these systems neglected and deteriorating over time.

VA was the first health care system in the country to deploy a fully electronic and interoperable health care recordkeeping system; but as we have observed over the years, sustainment of this system has slowly led to its obsolescence. Now the agency is playing catch up.

VA should be applauded for its efforts to make information more accessible to veterans by developing and deploying interactive portals through which veterans can manage their health care and benefits — eBenefits, MyHealtheVet and vets.gov. However, these systems are imperfect and at times unstable, leading to frustration for those who seek to access them and utilize their features. Regardless, VA must be commended for moving out deliberately on a number of these innovations with the goal of improving the veteran experience.

**Progress:**

Over the past few years, VA has moved out aggressively to reform an antiquated, paper-based disability claims process through the development of the Veterans Benefits Management System (VBMS), and new stakeholder tools for accredited veterans service organizations (VSOs) like

the VFW, specifically the Stakeholder Enterprise Portal (SEP) — a direct upload portal for VA Central Scanning, and the Digits-2-Digits (D2D) electronic claims submission pilot.

The VFW is generally impressed with the VBMS system. Since its deployment, our network of accredited representatives who assist veterans across the country have found the system to be generally user-friendly and efficient in tracking veteran claimants. This is a significant step in the right direction as VA seeks to develop 21<sup>st</sup> century IT capabilities. However, VBMS continues to have critical flaws that must be addressed.

VA's development of a direct upload portal through which accredited VSOs can submit claims documents and evidence directly to VA Central Scanning has the potential to be a game-changer for VA, if deployed properly. Since the rollout of SEP this fall, the VFW is generally happy with this system. It is intuitive. It is easy to monitor work flow. It is meticulous in keeping records of transactions. The VFW believes this capability was a longtime coming for VSOs and has the potential to significantly improve the efficiency of our service to veterans.

Though eBenefits and MyHealtheVet have proven to be helpful resources for veterans, each system requires a different unique user name, an onerous password combination, and in-person verification for full access. The systems have also proven to be unstable with regular outages or disabled features. Veterans have consistently communicated these challenges to the VFW, and the VFW has in turn asked VA for a more intuitive, single-portal solution. Thankfully, VA listened and is incrementally deploying a quality single-portal solution via the vets.gov migration.

The VFW has been privy to demonstrations of vets.gov and we have been repeatedly asked to stress test new features of the portal. To date, we are very satisfied with the product. VA should be commended for seeking out a competent third party, veteran-owned contractor — ID.me — who developed a state-of-the-art identity verification system that makes full access to the portal an easy transaction. When our staff was asked to sign up for the portal on our own time, it took many of us a matter of only minutes to verify our identity and start working inside the portal, rather than the burdensome verification process that was required to reach the same level of authentication for VA's eBenefits and MyHealtheVet. We sincerely appreciate VA's collaboration on this initiative and we look forward to continuing to work together to deliver a high quality, full service benefits management portal to our veterans.

VA has also made significant progress in leveraging health information exchanges to integrate private sector health care data with the VA electronic health care records of veterans who receive their care from VA and community care partners. Originally developed as a way to bridge the gap between VA and Department of Defense, the Virtual Lifetime Electronic Record (VLER) has also helped VA integrate the private sector and VA health care records of nearly 700,000 veterans. VLER eliminated the need for veterans to carry their records from one appointment to another, private providers faxing records to VA, and VA needing to scan paper records into its system. Doing so improves health care outcomes by reducing duplicate tests, improving coordination of care, and expediting the delivery of care for veterans.

The VFW supports continuing the VLER program and calls on Congress to eliminate barriers to its success, such as an outdated law that limits VA's ability to share health care records with its community care partners. The outdated law requires VA to withhold the medical information of veterans who have been diagnosed with substance use disorder, human immunodeficiency virus, and sickle cell anemia, hindering VA's ability to transfer medical records with its community care partners. Congress must remove this statutory limitation.

Finally, we must commend the Board of Veterans Appeals for pragmatically seeking out new ways to manage workflow. Though we have not seen finite deliverables to date, we support their efforts of leaning on IT professionals to stress test potential solutions before prematurely deploying an unworkable solution.

### **Challenges:**

Though the VFW applauds the initiative VA has taken in developing and deploying IT solutions, we face challenges in collaboration to develop the best possible resources to serve veterans. We have also heard a dangerous word around VA of late that has the VFW deeply concerned about the future viability and functionality of these products: sustainment.

The VFW and our VSO partners consistently meet with VA to discuss our shared objectives in helping veterans navigate the complex VA benefits landscape. We have provided consistent feedback on the development and deployment of VA IT systems at all levels of the agency, to include meetings directly with the Office of Information Technology (OIT). However, some recent developments have left the VFW feeling neglected in helping to execute our part of VA's mission: meeting face-to-face with veterans to help them understand and navigate their benefits.

As VA develops new IT systems, the agency has a bad habit of prioritizing internal business processes over the needs of veterans. Past VA Secretary Bob McDonald consistently articulated this as one of his chief concerns in transforming VA from a rules-based organization into a principle-based organization. The VFW agrees that this is a draconian task that has sadly not improved much over the past couple of years. Two examples of this are the recent decision by VA to enforce Personal Identity Verification (PIV) access rules for VA computer systems; and the deployment of the National Work Queue (NWQ) for veterans' claims within VBMS.

First, the VFW continues to have significant problems in accessing VA computer systems because of the PIV card access rules set forth by VA. Last spring, VA recognized its significant challenges in issuing timely PIV identification cards and loading proper IT permissions all across the agency. VA also recognized the need to increase IT security, which is something the VFW understands. However, instead of fixing the PIV card issuance problems, VA OIT eliminated exemptions and now requires PIV card access to log onto VA IT systems.

Make no mistake; the VFW understands that VA needs to ensure information security across its systems, but PIV enforcement and the simultaneous neglect to the PIV issuance processes has locked many VFW advocates out of the IT systems to which we need access to serve as responsible advocates for veterans. For example, one of our accredited representatives in Kansas City, Missouri still needs his IT permissions added to his PIV card to once again access VBMS.

He has raised the issue locally and the VFW has raised the issue here in Washington. Instead of finding a solution, VA business lines point fingers at one another. Our representative has lacked the proper access to the systems he needs for more than eight months.

What the VFW finds so disappointing about the PIV issue is that this is not new technology and this is not a new challenge for VA. As a matter of fact, the federal government is already contemplating migrating away from this technology, as it is already more than a decade old. By a point of reference, this technology was first introduced to the federal government through the military. Back in 2006, while still serving in the U.S. Army Reserve, my military ID card was set to expire. At the time, I was a Department of the Navy civilian who required a PIV badge to access the Navy networks. During my lunch break, I was able to visit the ID office on Naval Station Newport where they took my photo, issued me a new U.S. Army ID card, and loaded it with the proper IT permissions to access the Navy network. I walked back to the office with my new, functional ID and continued my work unabated. Fast forward ten years, and VA still cannot figure this out. The VFW believes this is inexcusable.

Next, as VA deployed VBMS, they also worked to develop NWQ to distribute work around the country. The VFW generally supports the concept of NWQ and we agree with VA that if implemented properly, it has the potential to ensure consistent, accurate and timely benefits to veterans. Since its inception, VA has asked for VSO input on NWQ. Sadly, very few of our needs have been addressed in its deployment. The VFW will present on this topic before the Disability Assistance & Memorial Affairs Subcommittee next week, but we will summarize our concerns here.

For decades, accredited VSO representatives have been afforded 48 hours to perform a final review of a proposed rating decision before it is promulgated and sent to the veteran. The VFW and our partner VSOs view this as a final quality assurance check to ensure VA and our accredited representatives have produced an accurate rating decision for our veterans. Unfortunately, the deployment of NWQ has prevented us from performing this final quality check.

VA moves work around its regional offices very quickly via NWQ. The VFW understands this. It makes sense for VA to shuffle its business processes to offices that have the capacity to complete the work in a timely manner. However, when VA proposes a rating decision and posts it for review, they do not return the claim to the regional office where the claim originated — depriving the accredited VFW service officer familiar with the claim the opportunity to review it for accuracy before the claim is finalized. This makes no sense to the VFW, especially considering that our resources are customer-facing and aligned to serve the veterans in a particular community.

This becomes a problem when VFW representatives are overwhelmed with excessive rating reviews in offices postured to handle only a small population of veterans. This is also a problem in states that invest finite state tax dollars in veteran claims assistance programs designed to serve veterans within their borders.

Our argument to VA is that the processes they have sought to automate through NWQ are rules-based. This means any properly trained VA employee should be able to execute the business process to a high standard. This makes sense for VA. However, when VA assigns the rating review to a VSO in a random office, they do not take into account the customer-facing aspect of the VSO's job. VSOs and state governments align their resources to meet the needs of the community. Our job is customer service. Our clients share sensitive personal information with our advocates in confidence. It is our duty as veterans' advocates to ensure they receive the best possible service at the time and place of their choosing, not VA's choosing. Currently, the distribution of work via NWQ makes it nearly impossible for VSOs to do our job to a high standard.

VA has offered workarounds to this problem, but workarounds are not solutions. The VFW believes that once VA is ready to propose a rating decision, they must return the claim to the Station of Origination (SOO) for the 48-hour review. The VFW not only believes this will allow VSOs to conduct a proper review, but this will also make it easier on VA. When VSOs catch errors in the rating review, the process is improved. Our accredited representatives learn how VA rates, VA learns about its deficiencies, and veterans fully understand their rating decisions. This is a mutually supportive process that avoids conflict and cuts down on appeals. For the VFW, we consistently find errors in 10 percent of our rating reviews. If these are corrected, we help VA get it right the first time.

When we have raised this issue with VA, they have responded with indignation. They feel that their workarounds should be sufficient and they claim that resources will not allow them to reroute the work. The VFW believes that VA already has the capability to reroute the work, but they are unwilling to do so. Since NWQ moves work from office to office so frequently, and then eventually returns the work to the SOO, the VFW believes that the infrastructure is in place to move the work to reflect the veteran's needs in the final review process.

Again, as VA's partners, we believe NWQ can be a very good system to help veterans receive consistent, accurate, and timely benefits. We understand and support VA's initiative in resourcing work based on capacity in a digital environment. All we ask is that VA lets us help them deliver the best possible outcome to our veterans.

With regard to sustainment of projects, conversations about the future viability of IT initiatives have become more pessimistic as the agency prepares for the sustainment phase. Simply put, VA has told the VSOs that there is no more money to continue developing many of its IT systems, particularly its claims management systems, and that sustainment means they will only have the ability to fix emergency glitches.

The VFW believes VA has made significant progress in the development and deployment of many of its IT systems. However, we must warn against stagnation. In the past, we have seen Congress make significant investment in the development of IT resources, and we have seen VA move out aggressively to deploy these solutions. Unfortunately, once deployed, we usually see these solutions stagnate, meaning veterans, VSOs and VA employees are left to work with half solutions that quickly become obsolete.

Proper IT development requires consistent investment in the development and evolution of a product. For example, I was an early adopter of Facebook back in 2004 when it was relegated to connecting with other students on college campuses in the Northeast. At the time, there were no photo albums, no news feeds, no external applications, and no public access. Since then, Facebook has continued to make investments internally and externally to build what has become one of the largest interconnected information networks in the world. The developers at Facebook never settled on what they believed to be a “good enough” solution. The same can be said for Google, which evolved from a state-of-the-art search engine into a full-service digital platform for communication, information management, and commerce.

By contrast, VA develops groundbreaking systems, like the aforementioned electronic health care record —Veterans Health Information Systems and Technology Architecture (VistA) — but stagnation and VA’s inability to keep pace with the private sector quickly renders such innovations obsolete. When it was first developed more than 30 years ago, VistA won awards for changing the medical records landscape and was praised for ushering in 21st century health care. VistA continues to serve as a critical tool for America’s largest integrated health care system, but it is no longer the state-of-the-art system it once was. Private sector electronic health care record systems have not only caught up to VistA, they have surpassed its ability to assist health care providers in caring for their patients.

The VFW agrees with the Commission on Care that it is time for VA to adopt a commercial-off-the-shelf (COTS) solution to its aging electronic health care system. VA must be commended for its innovation and for continuing to modify VistA to meet today’s needs, like developing a new user interface called the Enterprise Health Management Platform (eHMP) to reduce the time providers spend on the computer and maximize face-to-face time with their patients. To that end, VA has devoted time and resources to developing workarounds or patches to update VistA’s aging infrastructure. We are glad VA has continued to turn to the VFW and our VSO partners when developing such workarounds and patches to make certain they meet the needs of veterans. However, the VFW believes VA would be better served by adopting a commercial electronic health care record infrastructure that can incorporate many of its new projects or completely eliminate the need for patches to VistA.

VA can never build an IT system then declare victory and walk away. Our veterans need and deserve better, which is why we ask this committee to continue supporting the investment and evolution of VA IT resources. We all know there are significant challenges in this mission, but we look forward to working with VA and this committee in addressing them.

**Information Required by Rule XI2(g)(4) of the House of Representatives**

Pursuant to Rule XI2(g)(4) of the House of Representatives, the VFW has not received any federal grants in Fiscal Year 2016, nor has it received any federal grants in the two previous Fiscal Years.

The VFW has not received payments or contracts from any foreign governments in the current year or preceding two calendar years.