

STATEMENT FOR THE RECORD
PARALYZED VETERANS OF AMERICA
HOUSE COMMITTEE ON VETERANS' AFFAIRS
SUBCOMMITTEE ON DISABILITY ASSISTANCE AND MEMORIAL AFFAIRS
CONCERNING
BEYOND TRANSFORMATION: REVIEWING CURRENT STATUS AND
SECONDARY EFFECTS OF VBA TECHNOLOGY

FEBRUARY 5, 2014

Chairman Runyan, Ranking Member Titus, and members of the Subcommittee, Paralyzed Veterans of America (PVA) would like to thank you for the opportunity to offer our views on the Department of Veterans Affairs (VA) current status of its transformation and the secondary effects of the Veterans Benefits Administration's (VBA) use of technology. While PVA has been encouraged by many of the effects that the integration and wide-spread implementation of technology has had, we still have concerns that we have expressed in the past, both to VBA and to Subcommittee members and staff.

As VA progresses in its new processing model for disability compensation claims, we are seeing a flurry of activity and updates to the Veterans Benefits Management System (VBMS). Currently VBMS 6.0 appears to be on target, but this timeliness does not necessarily address the real potential problems. This system has been able to accommodate many of the myriad of adjustments designed to standardize and automate VA claims processing and access to information. The tradeoff has been the often incompatible gateways to retrieve information, such as the need to access multiple systems with various passwords to retrieve required information. These VBA problems are short term, however, because VBMS will ultimately morph into the Stakeholder Enterprise Portal (SEP), a secure web-based portal which facilitates access to VA systems under a single umbrella. VBMS is currently being utilized to implement scheduled program releases at this point because SEP cannot be programmed in time to accommodate the targeted release dates. Incremental program changes are thus being made in VBMS and will be available in the SEP Portal when VBMS effectively morphs into SEP. This update will greatly simplify access to all available VA systems via a single gateway.

Supporting the improvements to VBMS is the national work queue strategy within VBA which is a critical and reasonable component of VBMS. The system was designed to be fluid and to facilitate the movement of work where it can best be done. In the past the only way an NSO could review a claim was to have the C-file on their desk. The significant impact of VBMS will be to expand their capability beyond the confines of the

office which will help to reduce the backlog and maintain the reduction, though PVA still has concerns with the backlog simply moving into the appeals realm.

In conjunction with the queue strategy is the work credit system which has always been a problem with VBA, and the automated IT component of this issue doesn't change the situation. The issue stems from what is measured and how the date is utilized once it is collected. This issue has historically steered VBA in the wrong direction when it comes to resource allocation, which is the end result of the application of work measurement data. Under Secretary of Benefits Hickey has been wise not to strip resources from offices that place on the lower end of the work measurement graph as that doesn't address the real problem.

One concern that PVA and other Veterans Service Organizations (VSO) have recently expressed is VA's recent statements on requiring electronic forms submission. This plan, if enacted, would significantly disadvantage veterans in seeking their earned benefits. If a veteran doesn't express his intention to secure a benefit on the right form, he or she won't be recognized as having made a claim. The burden is on the veteran and VA's duty to assist will be seriously diluted, potentially interfering with a veteran's access to their rightful benefit. This is a path that PVA cannot endorse.

PVA's major concern at this point is the ability of VBA employees to effectively comprehend and implement the new transformation initiatives as these new programs are rolled out. VA employees are conscientious, hard working individuals, however, the

ongoing changes have always been a challenge, as it would be for any employee. In addition, PVA has often testified on the lack of good training programs by VA that provide adjudicators with the base of knowledge needed for the complicated job of claims processing. Additionally, there often seems to be difficulty in getting the new policies, procedures or processes down to the lowest staff level. We believe this trend continues despite the transformation.

VBA has implemented a policy of designating super users to receive extensive training on new transformation applications, and these employees are subsequently directed to train their fellow employees on the use of the program. Our concern in this area is that the employees selected to receive this training may be highly qualified and may have the requisite IT skills to effectively utilize the full potential of the new initiative, but the employees that this person is designated to train, may not be as IT savvy. The potential for major misunderstandings is an aspect that cannot be ignored. PVA is concerned that the transformation initiatives can only work if there is adequate effective training and this may or may not be correlated with the number of documented hours recorded for this purpose.

The process of transformation has progressed to the point where turning back is not an option, nor is redesign of the entire process feasible. Unfortunately, if this training plan was a bad decision, it will not be known until it is too late. Thus we reiterate our concerns that PVA has emphasized in the past that the success of VBMS greatly depends on the process design, like rules-based processes, and supportive

technologies like Special Monthly Compensation (SMC) calculators, that undergird the system. This is the challenge for a rules-based computer system, it does not have the human interaction to fully understand the circumstances of a specific injury, particularly for those with catastrophic disabilities. The numerous issues faced by veterans with catastrophic injuries create a complex set of outcomes that cannot be easily reconciled by logic-based systems that cannot appreciate nuance in disability assessments. Calculators used in rules-based systems historically fail to compute the right ratings for persons with multiple issues. This type of decision analysis uses decision trees that attempt to enable the rater to simplify and resolve complex questions. This technique, however, can be problematic when the analysis involves highly qualitative assessments that are reduced to binary choices.

In summary while we see many obstacles to the progress of transformation based technologies, we see the potential to overcome these problems by empowering first line supervisors to effectively manage their employees. This level of management is responsible to evaluate the ability of their employees to effectively utilize the tools that are available to them. They are the ones who must decide if it is necessary to forgo a short term gain by requiring additional training for an employee who is not able to effectively utilize the potential time savings afforded by any of the new automated features of claims processing. While there is great pressure to increase efficiency and to reduce the claims backlog, employees must be properly trained and motivated by their first line supervisor. If not, they are simply moving the backlog downstream to the detriment of the veteran.

One final concern we have is recognition of the fact that VBA transformation initiatives are being scrutinized by multiple interested parties, not the least of which is this Subcommittee as well as other members of Congress. While oversight is critical, excessive reporting requirements and requests for responses to defend actions discovered in investigative committee reviews can be unreasonably burdensome and time consuming. This can also cause the parties to focus more on protecting their own jobs than on providing the best services for our veterans.

Mr. Chairman, we would like to thank you once again for allowing us to address VBA's technology transformation. We continue to hope that the advances in technology use will benefit all veterans, but VA must remember that technology is not the easy fix many portend it to be. This is particularly true when considering those with catastrophic disabilities.

PVA would be pleased to take any questions for the record.

Information Required by Rule XI 2(g)(4) of the House of Representatives

Pursuant to Rule XI 2(g)(4) of the House of Representatives, the following information is provided regarding federal grants and contracts.

Fiscal Year 2013

National Council on Disability — Contract for Services — \$35,000.

Fiscal Year 2012

No federal grants or contracts received.

Fiscal Year 2011

Court of Appeals for Veterans Claims, administered by the Legal Services Corporation — National Veterans Legal Services Program— \$262,787.