



Dr. Everett B. Kelley
National Secretary-Treasurer

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National President

Jeremy A. Lannan
NVP for Women & Fair Practices

December 12, 2018

Chairman Bost, Ranking Member Esty, and Members of the Committee:

On behalf of the American Federation of Government Employees, AFL-CIO (AFGE), and its National VA Council, which represents more than 700,000 federal and D.C. Government Employees, including over 250,000 front line employees at the Department of Veterans Affairs (VA) who provide vital care and services for our veterans, I write to you today about the hearing held by the House Committee on Veterans' Affairs, Subcommittee on Disability Assistance and Memorial Affairs (DAMA) on November 29, 2018 titled "VA's Development and Implementation of Policy Initiatives." This includes serving as the representatives of staff who work throughout the Veterans Benefits Administration (VBA) and are on the front lines serving veterans every day. In turn, AFGE has several comments on how proposed policy changes by VBA will impact the VBA workforce and its mission to serve veterans.

The National Work Queue:

During the hearing, members of subcommittee addressed several aspects of the National Work Queue (NWQ), and how in many ways it has hurt veterans. First and foremost, AFGE agrees with the Inspector General's (IG) conclusion that eliminating specialization has had a detrimental impact on veterans with claims, particularly those that are more complex and sensitive in nature. As the IG report explains, prior to the implementation of the NWQ:

The Segmented Lanes model required VSRs and RVSRs on Special Operations teams to process all claims VBA designated as requiring special handling, which included [Military Sexual Trauma]-related claims. By implementing the NWQ, VBA no longer required Special Operations teams to review MST-related claims. Under the NWQ, VSRs and RVSRs are responsible for processing a wide variety of claims, including MST-related claims. However, many VSRs and RVSRs do not have the experience or expertise to process MST-related claims.¹

Because of the level of difficulty in processing these claims, AFGE would support returning these and other former "Special Operations" cases including Traumatic Brain Injury back to a specialized lane or lanes in Regional Offices. Much like a doctor choosing to become a pediatrician and not being expected to be an expert in podiatry, not all VSRs and RVSRs should be expected to process highly specialized cases.

Furthermore, AFGE encourages the VA to modify the NWQ so that cases remain within the same regional office while they are being processed, and that VSRs and RVSRs are more clearly identified on each case file. This will allow for better collaboration between VSRs and RVSRs

¹ VA OIG 17-05248-241 | Page iii | August 21, 2018



(as was done prior to the implementation of the NWQ) and allow the staff of Veteran Service Organizations to better assist their members.

Information Technology:

AFGE also believes that the VBA can create a better environment to allow VBA employees to succeed by fixing Information Technology (IT) problems plaguing the agency. Highlighting the written testimony of Shane L. Liermann, Assistant National Legislative Director of the Disabled American Veterans (DAV), AFGE agrees with several of the recommendations made by DAV, including the need for VA to invest in and improve its IT infrastructure by fixing system automation with the Veterans Benefits Management System (VBMS). To quote Mr. Liermann:

Updated and modern IT is critical to the ultimate success of VBA. Despite past failed attempts to modernize its claims processing systems over the past two decades, VBA made a critical decision to transform its paper-based systems and replace them with streamlined business processes supported by modern IT systems. However, unless VBA is provided sufficient resources to fully implement and program new IT systems at the front end, both productivity and quality will continue to suffer, resulting in more errors and veterans waiting longer to receive their earned benefits.

Furthermore:

Over the past several years, VBA has developed and implemented new IT systems to support the transformations, including VBMS, the NWQ, and e-Benefits. Unfortunately, VBA must compete with other offices and agencies within VA for the limited IT funding available each year, delaying development and deployment of critical IT systems and programming. As a result, critical IT systems are rarely fully developed before business process changes are implemented; instead they are phased in over several years, forcing VBA to rely on an inconsistent mix of old and new IT systems, as well as an endless stream of suboptimal “work around” solutions.

AFGE would add that these delays and “work around” solutions make it more difficult for VBA employees to complete their duties, and that VBA employees suffer negative impacts on their production and quality ratings because of malfunctioning and uncooperative technology.

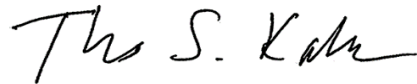
Training and Collaboration:

AFGE would also like to reiterate the DAV’s points on the need for improved training. Whether it is related to the “Intent to File” process for claiming benefits or special procedures for highly complex claims including Military Sexual Trauma, the additional training given to VBA employees will help them to better serve veterans and help them prevent facing unfair discipline for mistakes that they did not know how to avoid. With the misuse of the Department of Veterans Affairs Accountability and Whistleblower Protection Act of 2017 by VA management to unnecessarily terminate employees, the more training employees receive, the more likely they will be able to grow in their positions instead of constantly fearing removal.

Lastly, as the subcommittee and the VA decide what policies to implement in the future, as a stakeholder AFGE expects to be consulted. As the front-line employees processing the claims and using the IT in practice, and not just in planning, AFGE strongly encourages the VA to consult with AFGE, the exclusive representative of employees who have extensive experience and expertise and actually perform these duties.

Thank you, and I respectfully request that this letter be submitted for the record.

Sincerely,

A handwritten signature in black ink that reads "Thomas S. Kahn". The signature is written in a cursive, flowing style.

Thomas S. Kahn
Director, Legislative Affairs
American Federation of Government Employees, AFL-CIO