



## Testimony

Before the Subcommittee on Disability Assistance and Memorial Affairs,  
Committee on Veterans' Affairs,  
House of Representatives

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# VA DISABILITY BENEFITS

## Training for Claims Processors Needs to Be Enhanced

Statement of Elizabeth Curda, Director,  
Education, Workforce and Income Security

# GAO Highlights

Highlights of [GAO-24-107510](#), a testimony before the Subcommittee on Disability Assistance and Memorial Affairs, Committee on Veterans' Affairs, House of Representatives

## Why GAO Did This Study

In fiscal year 2023, VBA processed over 2.2 million claims for disability compensation and provided about \$136 billion in benefits to veterans with service-connected disabilities.

VBA provides training each year to thousands of claims processors. Training is particularly important as VBA hires more staff and implements new initiatives. VA has been on GAO's High-Risk List since 2003 due in part to challenges with managing disability claims workloads.

This statement discusses the status of recommendations from GAO's June 2021 report ([GAO-21-348](#)) that compared VBA's training program for claims processors with leading practices for training in the federal government.

## What GAO Recommends

GAO's June 2021 report made 10 recommendations to incorporate leading practices for training. VA agreed with these recommendations and has addressed six, but four have not yet been fully implemented.

Continued efforts by VBA to plan and evaluate its training program, in line with GAO's recommendations, and sustained attention to designing and implementing training would help claims processors better serve veterans with disabilities. Additionally, VBA would have greater assurance that its workforce has the necessary skills to process disability claims efficiently and effectively.

View [GAO-24-107510](#). For more information, contact Elizabeth H. Curda at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov).

July 2024

## VA DISABILITY BENEFITS

### Training for Claims Processors Needs to Be Enhanced

#### What GAO Found

In a June 2021 report, GAO found that the Department of Veterans Affairs' (VA) Veterans Benefits Administration (VBA) had not applied many leading practices for federal training efforts for its program to train new and experienced disability claims processors. Training is a key strategy to help ensure claims processors have the needed skills to make quality decisions on veterans' claims. GAO made 10 recommendations related to design, implementation, planning, and evaluation of VBA's training program. VBA has addressed six recommendations as of June 2024, but work remains to fully address those related to planning and evaluation.

- **Design.** VBA has taken steps to fully implement GAO's recommendation on design. In 2021, GAO reported that VBA used a variety of training delivery mechanisms, including computer-based and classroom training, consistent with leading practices. However, VBA had not established criteria to determine the most appropriate delivery mechanism. In December 2021, VBA reported creating a tool for VBA training staff to use in determining the delivery mechanism. VBA identified about a dozen courses for which staff applied this tool to develop or modify the delivery mechanism.
- **Implementation.** VBA has taken steps to fully implement all recommendations GAO made related to implementing its training program. Specifically, GAO previously found that VBA had taken steps to enhance available training for instructors, but according to VBA officials, it had not developed minimum training requirements. In 2023, VBA established training requirements for all instructors. In May 2024, VBA established a procedure to monitor instructors' training completion. In addition, GAO previously found that VBA had no requirement to monitor claims processors' completion of all required training. In December 2021, VBA established a standard operating procedure and set up a process to monitor training completion, in line with GAO's recommendation.
- **Planning.** VBA has taken some steps to develop a strategic approach to its training efforts but has not yet fully implemented two of three related GAO recommendations. In March 2024, VBA established a governance structure to coordinate training activities across three key VBA offices that help administer training. However, a fiscal year 2025 plan for the training program did not have comprehensive goals and other elements, including how program activities will be prioritized to meet goals, as called for in GAO's recommendations.
- **Evaluation.** VBA has not fully implemented two of three recommendations on evaluation. In 2021, GAO found that VBA collected and incorporated some stakeholder feedback about training and finalized plans to evaluate certain training, but these efforts were not comprehensive or systematic. The agency also had not completed an evaluation of its training program in recent years. Later in 2021, VBA established a policy for evaluating VBA training and created a process to review and incorporate feedback, as called for by GAO's recommendations. However, VBA has not yet demonstrated how it incorporates feedback from relevant stakeholders, as GAO recommended, or completed a plan to evaluate training for experienced claims processors.

GAO is continuing to monitor VBA's implementation of these recommendations.

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July 23, 2024

Chairman Luttrell, Ranking Member Pappas, and Members of the Subcommittee:

Thank you for the opportunity to discuss our June 2021 review of the Department of Veterans Affairs' (VA) Veterans Benefit Administration's (VBA) training program for disability compensation benefit claims processors.<sup>1</sup> As you know, VA provides cash benefits to veterans injured in service to their country. In fiscal year 2023, VBA processed over 2.2 million claims for disability compensation and provided about \$136 billion to about 5.5 million veterans.

VA faces well-known challenges with processing large volumes of disability compensation claims. These challenges raise questions about VA's ability to effectively meet the needs of a significant number of veterans seeking disability benefits, as VA reports an increase in claims received due, in part, to the Honoring our PACT Act of 2022 (PACT Act).<sup>2</sup> Contending with large claims processing workloads also potentially creates pressure for staff to sacrifice the quality of work to meet timeliness goals. Since 2003, VA has been on GAO's High Risk List due to issues with managing its disability claims workload.<sup>3</sup>

Effective training is key to helping ensure that claims processors have the skills to make timely and high-quality decisions—especially as VBA hires more staff, implements new initiatives, and updates eligibility criteria for assigning a degree of disability and compensation level. For example, according to a recent report by VA's Office of Inspector General, claims processors made errors in applying aspects of the updated eligibility

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<sup>1</sup>GAO, *VA Disability Benefits: Veterans Benefits Administration Could Enhance Management of Claims Processor Training*, [GAO-21-348](#) (Washington, D.C.: June 7, 2021).

<sup>2</sup>Pub. L. No. 117-168, 136 Stat. 1759 (2022). The PACT Act changed certain disability compensation examination requirements and expanded presumptive conditions associated with exposure to burn pits and other toxins, among other things, resulting in a potential increase in eligibility for certain health care and benefits.

<sup>3</sup>GAO's High-Risk series identifies government operations with vulnerabilities to fraud, waste, abuse, and mismanagement, or are in need of transformation. See the most recent list at GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to Be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: Apr. 20, 2023).

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criteria for hip and knee replacements due in part to deficiencies in staff training.<sup>4</sup>

In our June 2021 report, we examined VBA's training program for claims processors against a wide range of leading practices for training related to planning, design, implementation, and evaluation.<sup>5</sup> My statement today addresses VBA's recent progress in implementing the 10 recommendations we made in our June 2021 report and aspects of those recommendations VBA has not yet addressed. VA agreed with these recommendations. As of June 2024, six of these 10 recommendations have been implemented and four have not been fully addressed.

Specifically, my remarks today focus on VBA's progress applying leading practices for effective training in the federal government in four related areas (1) planning – establishing a governance structure, goals, and plans for its training program; (2) design – delivering training through the most appropriate methods to meet the needs of claims processors; (3) implementation – setting minimum training requirements for instructors and monitoring whether claims processors complete training; and (4) evaluation – evaluating the training program, including collecting and incorporating feedback.

For the June 2021 report, we collected and analyzed VBA policies, reports, and planning documents related to aspects of its training program. We also interviewed officials from VBA offices who help administer claims processor training: Compensation Service, the Office of Talent Management, and the Office of the Deputy Under Secretary for Field Operations.<sup>6</sup> In addition, we interviewed managers and claims processors at four VA regional offices who were selected for variation in office size, region, and claims workload. We also reviewed a selection of training materials. We used the following categories to describe the extent to which the agency applied relevant leading practices for training:

- Generally applied – most of the relevant leading practices.

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<sup>4</sup>Department of Veterans Affairs Office of Inspector General, *Veterans Benefits Administration, Rating Schedule Updates for Hip and Knee Replacement Benefits Were Not Consistently Applied*, 23-00153-41 (Feb. 21, 2024).

<sup>5</sup>For the leading practices, see GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: Mar. 1, 2004).

<sup>6</sup>In 2021, the Office of Talent Management became the Office of Human Capital Services.

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- Partially applied – some of the relevant leading practices.
  - Did not apply – did not apply any of the relevant leading practices.

More information on our scope and methodology is available in our June 2021 report.<sup>7</sup> We also reviewed information we received in April, May, and June 2024 from VA officials about steps they took to implement our June 2021 recommendations.

We conducted the work on which this statement is based in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Veterans with service-connected disabilities (i.e., injuries or illnesses incurred or aggravated during active-duty military service) may receive monthly VA disability compensation payments according to the severity of their disability. VBA's Compensation Service oversees the disability compensation program and employs thousands of claims processors to process disability compensation claims across its 56 regional offices. These claims processors include:

- Veterans Service Representatives (VSR) who gather evidence needed to determine entitlement and who review the amount of the award and authorize payment, if any, and
- Rating Veterans Service Representatives (RVSR or rater) who determine entitlement and the disability rating percentage.

Claims processors determine disability ratings and benefit amounts using the Veterans Affairs Schedule for Rating Disabilities and VBA's M21-1 Claims Processing Manual.

In recent years, VBA has changed its approach to training newly hired or promoted VSR and RVSR claims processors. Prior to fiscal year 2021, this training was called "Challenge training," a technical skills focused program conducted at a VBA training center. In 2019, VBA reported delivering Challenge training to almost 1,000 claims processors. In fiscal year 2021, VBA's Challenge training became the Virtual and In-Person

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<sup>7</sup>[GAO-21-348](#).

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Progression (VIP) training program. A major change under VIP training is having local instructors deliver more introductory training at regional offices rather than at a VBA training center, as in previous years.

According to VBA policy, VSRs are required to complete 40 hours of annual training.<sup>8</sup> VBA's Compensation Service assigns courses totaling at least 15 hours of training in response to national priorities, such as trends in errors. Regional offices select the remaining 25 hours of training from VBA's Learning Catalog.

To track the performance of claims processing, VA maintains reports of its claims inventory and claims accuracy on a public website. For example, as of June 22, 2024, VA reported that about 962,300 claims were awaiting processing. About 28 percent of those claims are considered backlogged, a term VA uses to indicate that these claims have been pending for more than 125 days since receipt. Regarding claims accuracy, VA tracks the proportion of error-free claims (claim-based accuracy), as well as the accuracy of individual medical issues contained within a disability claim (issue-level accuracy). For example, as of June 22, 2024, the 3-month issue-level accuracy rate was about 91 percent, which represents a drop from over 97 percent as of May 2023.

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## VBA Has Addressed Six of Our 10 Recommendations Related to the Planning, Design, Implementation, and Evaluation of Its Training Program

**Planning – Establishing a Governance structure.** In 2021, we reported that the agency lacked a governance structure to guide its training program and coordinate activities across three key VBA offices that help administer training. We recommended that VBA establish a governance structure that identifies clear lines of authority among the VBA offices responsible for guiding strategic training efforts and establishing clear accountability for the success of these efforts.

VA generally agreed with this recommendation and in March 2024, VBA fully implemented it by developing a charter to establish a governance structure. VBA's charter states that this governance structure would ensure strategic, programmatic, and operational governance of the training program. The governance structure includes: (1) an Executive Training Board responsible for overall strategic direction, including oversight of the training budget; and (2) a Training Oversight Council that

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<sup>8</sup>For fiscal year 2024, VBA policy states that the 40-hour requirement applies to VSRs, while RVSR training requirements for the fiscal year are determined by individual competency-based training system (CBTS) remediation needs (i.e., tailored to employee training needs based on their CBTS assessment results) and regional office-selected training.

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includes senior decisionmakers in VBA offices, such as Compensation Service. Major duties of the board and council include establishing priorities, developing training plans, and implementing metrics to measure returns on investments in training. The governance structure includes VBA leadership, as well as representatives from VBA offices, such as the Office of Field Operations.

Successfully using this governance structure could help VBA align its training efforts with accountability for training program results. Based on the council duties outlined in the charter, this structure could also help VBA address our other recommendations on goals, plans, and evaluation.

**Design – Determining delivery mechanisms.** We found that VBA used a variety of training delivery mechanisms, including computer-based and instructor-led classroom training, which is consistent with leading practices. However, claims processors and managers we interviewed raised concerns about whether the training delivery mechanisms meet course requirements and the needs of attendees. For example, although claims processors said they preferred live, instructor-led training because it provides opportunities to ask questions, most claims processors described receiving a significant amount of self-paced training, even before the COVID-19 pandemic.

Regional office staff we interviewed had also described instances in which different types of training could benefit from specific delivery mechanisms. For example, trainings that require complex practical exercises might be better taught in person, while pre-recorded training may be helpful in delivering consistent information regarding major claims processing changes. However, VBA had not established criteria to determine the most appropriate delivery mechanism.

We recommended that VBA document and use criteria to decide when a specific training delivery mechanism should be used. VBA concurred with this recommendation and, as of August 2022, completed actions to fully implement it. Specifically, VBA developed a tool and job aid to guide VBA personnel in selecting the most appropriate training delivery mechanism and demonstrated that it provided its training staff with criteria and the tool to help select the best training delivery mechanism. To use the tool, staff consider the relevant details of the training, such as the training audience, and answer questions about the training based on its learning objectives. The tool generates recommendations for the best method—such as instructor-led training or simulations—to deliver that training. VBA identified about a dozen new and existing courses where staff applied this

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tool to develop or modify the delivery mechanism. Continuing to use this tool and job aid should help VBA staff better match the training's content with its delivery mechanism, and thereby improve the training's effectiveness.

**Implementation – Ensuring instructors are qualified.** We reported in June 2021 that claims processors in two of our four discussion groups described inconsistencies in instructor quality, and that VBA had taken steps to ensure that instructors are qualified. For example, VBA had taken steps to enhance training for instructors, including developing an instructor certification program. In addition, VBA had begun requiring headquarters approval of regional office instructors who teach VIP training for newly hired or promoted claims processors.

However, we reported that according to VBA officials, the agency lacked minimum qualifications or requirements for regional office instructors overall, and the certification program, although encouraged, was optional. We recommended that VBA establish and monitor minimum training requirements to prepare all course instructors at regional offices to conduct claims processor training. VA agreed with this recommendation and has fully addressed it.

In May 2024, VBA clarified that as of 2023, instructors of all claims processor training are required to provide documentation of their qualifications, which includes completion of at least one instructor training course. A May 2024 standard operating procedure lays out VBA's process for ensuring that instructors maintain current documentation of their qualifications, including completed instructor training. Requiring up-to-date training for all instructors should help to ensure the training for new and experienced claims processors is of high quality.

**Implementation - Ensuring accountability by monitoring training.** In 2021, we found that VBA monitored training to ensure claims processors complete centrally assigned training but did not ensure they completed all 40 hours of required training. Leading practices for training state that agencies should establish mechanisms to ensure that employees successfully complete assigned training.

We recommended that VBA develop and implement a policy to monitor claims processors' completion of annual regional office-selected training hours. VBA concurred with this recommendation and has fully implemented it. Specifically, in December 2021, VBA established a standard operating procedure to monitor training completion and set up



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an associated process. Based on our review, this process has helped VBA identify regional offices with claims processors who have not completed training and follow up to ensure completion.

**Evaluation - Planning evaluations.** We found that prior to our 2021 report, VBA did not have a formal evaluation plan, and had not completed an overall evaluation of its training for disability claims processors in a number of years. We recommended that VBA establish a policy to help ensure recurring evaluation of training. VBA agreed with this recommendation and, in November 2021, fully addressed it by establishing a policy for evaluating VBA mission-based training programs.<sup>9</sup>

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## VBA Has Not Fully Addressed Four of Our 10 Recommendations Related to Planning and Evaluation of Its Training Program

**Planning – Establishing performance goals.** In 2021, we found that VBA had not established program-wide goals for its training program. We recommended that VBA establish performance goals specifically for VBA’s training program for disability claims processors. We also stated that these program-level goals should have specific targets to provide a basis for comparing actual program performance with expected results. VA agreed with this recommendation and has partially addressed it.

In its fiscal year 2025 training plan, VBA reported goals for several aspects of its training program for disability claims processors. For example, one goal is for 100 percent of newly hired raters to complete virtual and in-person training with an 80 percent or higher level of proficiency. However, other aspects of the training program, such as the annual required training, do not have associated goals or performance targets. Until VBA establishes measurable performance goals, it cannot effectively assess its training efforts, or the training program overall.

**Planning - Documenting a training strategy or plan.** We found in 2021 that VBA had documented strategies for some aspects of its training program but had not developed or documented a comprehensive strategy or plan for claims processor training. Officials told us they focused on urgent or emerging training needs, such as needs in response to appeals modernization and changes to claims processing in response to the COVID-19 pandemic, rather than prioritizing the creation of an overall training strategy. We recommended that VBA develop and document an integrated and comprehensive training plan or strategy for its program for

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<sup>9</sup>Department of Veterans Affairs, Veterans Benefits Administration, VBA Letter 20-21-19, *Evaluating Training Programs and Training Systems Policy* (Nov. 30, 2021).

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training disability claims processors. VA agreed with this recommendation and has partially addressed it.

As of April 2024, VBA has developed a fiscal year 2025 training plan. We reviewed this plan and determined that while it has some improvements over prior year plans, it does not include all elements of a training plan, as described in our prior work on assessing training. These elements include linkages with the agency's strategic objectives, priorities established among competing demands, efforts to address employee developmental goals, and anticipated benefits and projected costs. For example, VBA's training plan describes how ongoing assessments can help determine training needs but does not indicate when VBA will conduct these assessments, or the planned actions to identify training needs.

Moreover, the plan is unclear about how the training program's goals align with VBA's goals. For example, VBA has longstanding efforts to track the accuracy of its claims decisions, which it reports weekly on a public website. However, the training program goals and measures do not address how VBA training will help achieve the desired accuracy of benefits decisions made by claims processors. Until VBA incorporates all elements of a training plan, this plan may fall short of aligning training with agency needs.

**Evaluation - Collecting and incorporating feedback.** In general, in 2021 we found that VBA did not have a comprehensive policy or approach for the kind of feedback to collect and from whom, and how this feedback should be incorporated into the training program. Specifically, we reported that VBA had collected feedback on the training program from several stakeholders, including veterans service center managers, other regional office managers, and claims processors, but that other stakeholders' perspectives were missing. For example, VBA did not collect the insights of claims processors' direct supervisors, who, according to leading practices, might have valuable perspectives on the extent to which training contributes to employee performance. We also found that VBA made limited efforts to incorporate the feedback it collected. Specifically, VBA compiled reports of training that had been delivered, but officials were not systematically reviewing those reports to determine whether adjustments needed to be made when planning future training.

We recommended that VBA develop and document a policy and related processes for collecting and incorporating feedback from relevant stakeholders on the strengths and weaknesses of its claims processor

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training program. VBA agreed with this recommendation and has partially addressed it.

In September 2023, VBA reported that it developed and documented a training evaluation process. The process incorporates training data, evaluation reports, and the views of VBA's in-house evaluation experts, who make recommendations for training improvements. VBA's documentation on this process explains that each recommendation must have a decision on whether to implement it and the decision must have supporting documentation. However, the process does not clearly articulate how these recommendations for training improvements incorporate views of training participants and other stakeholders. Routinely incorporating the feedback from stakeholders—including training participants, supervisors, and instructors—would help VBA make practical improvements to its training.

**Evaluation - Conducting evaluations.** We found that VBA had not completed efforts to conduct evaluation activities to help ensure continuous improvement of its training program. We reported in 2021 that VBA had developed evaluation plans for some newly hired or promoted claims processor training. For example, in some cases this type of training had evaluation plans that included performance measures against which to evaluate the training program. These measures were aligned with data collection activities, such as surveys for claims processors who completed the training within 3 or 6 months, and surveys of their supervisors. In addition, the surveys included open-ended questions to collect additional information on opportunities to improve the training.

However, other components of its training program, such as training for experienced claims processors, lacked evaluation plans. We recommended that VBA ensure that Compensation Service complete and implement evaluation plans for its training for disability claims processors and that such plans align with leading practices, such as those outlined in VBA's strategy for evaluating training. VA concurred with this recommendation and has partially addressed it.

In December 2021, VBA officials reported they were finalizing several evaluation plans, including one for its new competency-based training system. In February 2022, VBA provided fiscal year 2022 evaluation plans for several components of its training program, and in December 2022 shared examples of evaluation reports. However, as of June 2024, VBA has not provided an evaluation plan or reports for PACT Act training,

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or for the annual required training. Until VBA completes and implements plans to evaluate all components of its claims processor training, it will lack assurance that training efforts are responsive to agency needs and resulting in expected performance.

In summary, VBA has taken several positive steps to improve its training program in response to our June 2021 report. However, 3 years after we published our report, several gaps remain. Further efforts are needed to incorporate a range of leading training practices for planning and evaluating the training program to help ensure that VBA's training will meet current and emerging needs for the disability compensation program.

An effective VBA training program is a key strategy for ensuring that claims processors make timely and high-quality decisions on veterans' disability compensation claims. A strong training program is critical as the agency hires large numbers of new claims processors and operates in an ever-changing environment. We will continue to monitor VBA's progress implementing our remaining June 2021 recommendations.

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Chairman Luttrell, Ranking Member Pappas, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

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## GAO Contact and Staff Acknowledgments

If you or your staff have any questions about this testimony, please contact Elizabeth H. Curda at (202) 512-7215 or [curdae@gao.gov](mailto:curdae@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this testimony are James Whitcomb (Assistant Director), Dana Hopings (Analyst in Charge), and Caitlin Croake, as well as Cliff Douglas, Alex Galuten, Shirley Hwang, Serena Lo, Dawn Locke, Kathleen van Gelder, Adam Wendel, and Ashanta Williams.

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Sarah Kaczmarek, Acting Managing Director, [KaczmarekS@gao.gov](mailto:KaczmarekS@gao.gov), (202) 512-4800, U.S. Government Accountability Office, 441 G Street NW, Room 7149 Washington, DC 20548

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## Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814, Washington, DC 20548