

Testimony of Jay Schnitzer, M.D., Ph.D.
Before the Subcommittees on Economic Opportunity and Technology Modernization
of the
House Veterans Affairs Committee
May 9, 2019

Chairman Levin, Chairman Lee, Ranking Members Bilirakis and Banks, and distinguished Members of the Subcommittees on Economic Opportunity and Technology Modernization, thank you for the opportunity to testify before you today on matters relating to the implementation of Sections 107 and 501 of the Colmery Act, also known as the Forever GI Bill (FGIB). These provisions impact all Post-9/11 GI Bill beneficiaries in receipt of a Monthly Housing Allowance (MHA), as they changed the way the Department of Veterans Affairs (VA) must pay MHA. The law amended the location basis for the MHA and aligned MHA payments with the Department of Defense's basic housing allowance (BAH) rates. As you know, implementation of this legislation is a critically important issue for untold numbers of Veterans. MITRE very much appreciates the opportunity to share our insight from our work on this critical program.

MITRE is a 501(c)(3) not-for-profit corporation. We are chartered to operate in the public interest, which includes operating federally-funded research and development centers, or FFRDCs, on behalf of federal agency sponsors. We currently operate seven FFRDCs sponsored by a variety of federal sponsors including the Department of Veterans Affairs, which is a co-sponsor of MITRE's Center for Enterprise Modernization (CEM). Our Center for Enterprise Modernization was established in 1998 by the Department of Treasury's Internal Revenue Service (IRS) and we have been proud to support many modernization efforts under that FFRDC, including aspects of the VA's modernization efforts. The other primary sponsors for which MITRE operates FFRDCs include the Department of Defense; the Centers for Medicare and Medicaid Services at the Department of Health and Human Services; the National Institute of Standards and Technology; the Federal Aviation Administration; the Department of Homeland Security; and the U.S. Courts – the latter being the only non-Executive Branch entity that has created an FFRDC to date.

I mention these other sponsors because operating seven FFRDCs for this wide range of agencies gives MITRE a truly unique vantage point with regard to the execution of critical programs and modernization challenges facing the federal government. It also greatly informs the advice we are able to provide to those whom we assist.

Given this context, I think it's important to stress to the committee right up front that the kinds of issues the VA experienced in executing Sections 107 and 501 of the Colmery Act last year are not unique to the VA. Indeed, they are challenges we have seen repeatedly across the government as agencies struggle to execute highly complex, integrated mission requirements and modernize their systems and processes to address new mission needs.

MITRE's involvement with the Colmery Act began on September 28 of last year, when we were engaged by the Office of Information and Technology (OIT) to perform an Independent Technical Assessment (ITA) of the VA's implementation of Sections 107 and 501 of the FGIB. As noted above, these provisions made significant changes to Veterans' education benefits by enhancing and expanding these benefits for Veterans, service members, families, and survivors. The set of systems and processes involved in administering GI Bill benefits, then and now, include a major system referred to as the Long-Term Solution, or LTS. At the time MITRE was asked to conduct the ITA, LTS and other legacy GI Benefits systems were being updated to provide the functionality, processes, and datasets required to deliver the expanded benefits required by the Colmery Act. However, the deployment of the requisite Colmery Act capability originally expected to occur by July 2018 was repeatedly delayed.

The focus of the independent assessment requested by OIT was to identify issues related to the delayed delivery of LTS and to recommend a resolution to the issues associated with completing and deploying the required system updates. OIT and MITRE jointly developed a Terms of Reference document to scope the work. Subsequently, MITRE was contractually tasked to explore the following five assessment areas:

1. Leadership and Governance;
2. Technical Environment;
3. Process;

4. Requirements Management; and
5. Personnel Authorities and Responsibilities.

During the course of the ITA's execution, a sixth topic of concern, Software Code Evaluation, was added to the scope.

The ITA team received and reviewed approximately 50 documents related to the implementation of functionality supporting the Colmery Act. It conducted site visits and interviews with the development contractor and multiple OIT and Veterans Benefits Administration (VBA) leaders and managers. The ITA team also performed a rapid software code evaluation of the latest LTS code base.

After documenting observations from the interviews, site visits, software code evaluation, and document reviews, the ITA team concluded that the previous strategy for implementing the Colmery Act, consisting of a distributed model with many leaders across multiple organizations in charge of specific operational and oversight activities, with little or no semblance of a tightly-coupled, integrated approach, was not conducive to success. Analysis of the observations resulted in the development of 22 findings and 20 recommendations, contained in our technical report.

The ITA team's review of the observations, findings, and recommendations across the assessment areas – informed by industry benchmarks and best practices, insight from subject matter experts, and experience with large-scale software intensive systems – enabled it to identify four systemic findings that were preventing rapid integrated capability delivery under the strategy then in place:

1. Technical and business leaders were not fully empowered to address issues related to the Colmery Act due to a lack of clear authority, priorities, and goals;
2. Work priorities, resources, and authorities for execution were not aligned for the delivery of Colmery Act functionality;
3. Operations and processes within and across VBA and OIT were not focused on the Colmery Act functionality, impeding the information flow to leaders; and

4. Data and tools were not integrated across LTS and the legacy systems, impeding delivery of the Colmery Act functionality.

The ITA team's recommendations spanned all five assessment areas, as well as the software code evaluation. Many, but not all, of the ITA recommendations directly aligned to and addressed one or more of the four systemic findings highlighted above.

As noted, several key findings related not to technical considerations, but rather to the assignment of responsibilities and questions of alignment centered around governance, authorities, priorities, and goals. Among other things, the ITA identified the need to establish:

- A single cross-organizational business leader and champion for the overall effort;
- New program governance structures, including a new Light Governance Council to serve as the decision authority for definition and enforcement of norms for executing program activities, as well as the approval or disapproval of lifecycle processes, control gates, activities, funding, acquisitions, resources and systems required to achieve successful implementation;
- A new Program Integration Office, accountable for definition, coordination, and management of functional, technical, and programmatic activities across the VA; and
- An end-to-end systems integrator, to coordinate planning, development, and integrated testing of all systems associated with implementation of FGIB, including new software development, interfaces with legacy systems, systems architecture, and testing.

I am pleased to inform you that these recommendations and others were fully accepted by the VA leadership soon after our ITA was completed and briefed to senior leaders in December. The restructuring recommendations oriented around program oversight and management have been implemented, and several of the technical recommendations have been, as well. As you know, the Under Secretary for Benefits was appointed to oversee overall implementation of the effort, aided by the Chief Information Officer and supported by a Light

Governance Council, referred to as Program Governance, led by two Co-Chairs, representing the interests of the business and the technical communities respectively. The Under Secretary is actively leading a very focused and fully integrated effort to address the remaining ITA recommendations, which are currently in the process of being implemented along a determined timeline with final delivery by December 2019.

Reporting to the Under Secretary for Benefits, Program Governance, led by the Director, Education Service and the Education Product Line Manager for the Office of Information and Technology, provides technical and operational leadership, direction and broad guidance to the Colmery program, and foster an environment where decisions can be made that ensure the program meets objectives.

And reporting to Program Governance is a new Program Integration Office (PIO), led by key leaders from the Education Service, Office of Business Process Integration and OIT, who are responsible for definition, coordination, and management of functional, technical, and programmatic activities. MITRE is embedded within the Program Integration Office.

This leadership team has been both highly integrated and extremely proactive. As is typical for any integration effort, the program is not completely without risk – given the many systems and organizational components involved, there are multiple interdependencies – but the VA now has in place an integrated program team that is deliberately managing to that risk by identifying the critical path activities and decisions needed to succeed and contingencies to mitigate the risk.

MITRE remains committed to the success of this initiative in partnership with the VA leadership and the selected systems integrator. We anticipate providing independent, conflict-free strategic advice and guidance to the Program Integration Office through final delivery. Our involvement thus extends to a broad range of activities that includes program and technical strategy, systems engineering, requirements engineering, test and evaluation engineering, acquisition, and cost estimating in support of the planning, implementation, and deployment. I should note that it is MITRE's intention to phase out its involvement in the Department's program integration function following delivery of the Colmery Act solution, but our goal is to

assist the VA in establishing an organic capability to perform this integration function on its own in the future. We view the model set forth by the ITA, which identified systemic findings that have been addressed by the VA, systems integrator, and contract team in this instance, as a model that is exportable to other complex integration and modernization efforts in the VA's current and future portfolio of programs and projects, and the VA leadership has expressed its intention to adopt this approach going forward.

In closing, let me just note that of MITRE's roughly 8,500 personnel, some 30 percent are Veterans. There are few duties that our employees consider more noble and consequential than honoring, through our support for the VA, the service and sacrifice of our nation's men and women in uniform. On behalf of the entire MITRE team, I greatly appreciate the opportunity to come before you today, and I look forward to your questions.