

**Testimony of
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Before the
Subcommittees on Economic Opportunity and Technology
Modernization
of the
House Veterans Affairs Committee
Hearing on
“Digital G.I. Bill Undelivered: Contracting Challenges and the Need for
Acquisition Reform”
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Chairman Van Orden and Chairman Barrett, Ranking Members Pappas and Budzinski, and other Members of the Subcommittees, thank you for the opportunity to testify before you today on matters relating to the Department of Veteran’s Affairs (VA) Digital GI Bill program. Successful modernization of legacy IT is critical to improving the Veteran experience. MITRE very much appreciates the opportunity to share our insight from our work on this critical program.

MITRE is a 501(c)(3) nonprofit systems engineering, applied research, and advanced technology organization that operates Federally Funded Research and Development Centers (FFRDCs) in support of federal agencies spanning national security, homeland security, law enforcement, cybersecurity, health, transportation, and economic competitiveness, including the Department of Veterans

Affairs. MITRE's technical and subject matter experts have had the privilege of supporting many modernization efforts across the federal enterprise. Our workforce of approximately 7,000 is headquartered at campuses in McLean, VA, and Bedford, MA.

Currently, I am a Managing Director in MITRE's Center for Government Effectiveness and Modernization, responsible for directing our support to modernization of benefits and service delivery across all Veterans Benefits Administration (VBA) lines of business, the VA's Office of Information & Technology, and the Social Security Administration.

A Trusted Partner

MITRE has been a partner with the VA's Education Service since 2008, having supported multiple projects focused on improving delivery of education benefits, such as the implementation of The Post-9/11 Veterans' Educational Assistance Act of 2008 (Post-9/11 GI Bill), Harry W. Colmery Veterans Educational Assistance Act of 2017 (Forever GI Bill), and the Digital GI Bill program.

MITRE's role has focused on providing strategic advice, guidance, and assistance in the areas of systems engineering, program integration, and organizational change. Our work included completing the annual update of the life cycle cost estimate (LCCE) for the Digital

GI Bill (DGIB) program from 2021 (version 1.0) through 2025 (version 5.0)., which was delivered in April 2025.

Life Cycle Cost Estimate

The Life Cycle Cost Estimate (LCCE) calculates the total cost to the Government for acquiring and owning a system throughout its lifetime, far beyond any contracts. It establishes a program cost baseline, aiding resource planning, program justification, and decision-making.

Required for programs exceeding \$50 million¹, the LCCE aligns with the Office of Management and Budget's (OMB) Capital Planning and Investment Control (CPIC) framework, as outlined in the Capital Programming Guide and OMB Circulars A-11 and A-94.

The LCCE is updated annually per GAO recommendations to reflect changes in technical, economic, and programmatic assumptions, and fact-of-life changes such as new legislation or court decisions impacting the agency, Veterans, service members, and beneficiaries. It supports financial decision-making and informs future budgetary needs. Developed using GAO's Cost Estimating and Assessment Guide (CEAG)², the LCCE functions as an input-output model, with inputs capturing technical, economic, and programmatic parameters and assumptions,

¹ The White House - *OMB Circular A- 11*. Retrieved from: [a11.pdf \(whitehouse.gov\)](https://www.whitehouse.gov/omb/circulars-a-11)

² GAO Cost Estimating and Assessment Guide - GAO-20-195G, Published: Mar 12, 2020.

ultimately producing a point estimate and a range estimate to establish contingency reserves.

The initial version of an LCCE is considered the baseline and typically exhibits a higher level of uncertainty, with the point estimate having an approximate 25% confidence level based on empirical studies³. Version 1.0 of the DGIB LCCE reflected a point estimate of \$1.295 billion (then-year dollars) at the 25% confidence level, meaning there is a 75% probability of the point estimate increasing. GAO recommends using the estimated value at a 50% confidence level for budget projections in mature programs to establish contingency reserves. With each subsequent iteration, the uncertainty should decrease, and the point estimate confidence level should increase. The program cost team diligently tracks changes to the programmatic and technical environments and associated assumptions to inform annual updates and provide input to decision-makers.

As of the April 2025 update (version 5.0), the DGIB Program has an estimated total cost of \$2.38 billion in base year FY21 constant dollars over a ten-year period, rising to approximately \$2.68 billion when adjusted for inflation (then-year dollars). At a 50% confidence

³ Journal of Cost Analysis and Parametrics - *Enhanced Scenario-Based Method for Cost Risk Analysis: Theory, Application, and Implementation*. Retrieved from: <https://www.tandfonline.com/doi/full/10.1080/1941658X.2012.734757>.

level, the program's estimated life cycle cost reaches \$2.76 billion in then-year dollars, including a contingency reserve of \$93 million.

The Digital GI Bill program is large and complex and accordingly has inevitably encountered challenges, unanticipated complexities, and the realization of risks that have led to schedule delays and increased costs. Replacing extremely old legacy IT systems that rely on outdated software languages and hardware, such as the VA's 1970s-era mainframe Benefits Delivery Network (BDN) among others, presents a multitude of challenges. As expected, this effort has required re-engineering that yields issues that are difficult to anticipate and necessitate extensive testing and validation to minimize disruption to business operations such that access to benefits is not delayed.

The impact of challenges associated with modernizing legacy IT systems that are this dated, as well as updates to assumptions regarding claims volume, automation, the number of required Veterans Claim Examiners (VCE) post full implementation, and alignment of DGIB with dependent legacy systems and other large-scale modernization programs schedules and roadmaps to minimize the disruption of services resulted in the point estimate increase from LCCE version 1.0 (conducted in 2021) to version 5.0 (delivered in April of 2025). The primary areas of cost increase over the lifecycle are the VCE assumption

and timing of required automation targets (\$747M), and the transition to the GSA Alliant 2 contract, which has higher rates, to extend the platform configuration by 4 years to accommodate schedule impacts (\$485M).

VBA's active executive leadership and ongoing evolution of program processes, tools, and experienced staff will enable the program to continue identifying challenges, crafting options, and proposing adjustments and improvements that will increase the probability of future success.

A Record of Accomplishment

Over the past five years, the Digital GI Bill program has had many accomplishments delivering eight successful major releases, including the migration of all benefits chapters to the platform, retiring of the Benefits Delivery Network (BDN) 1970s mainframe, and additional automation capabilities resulting in dramatically faster claims processing.

The integrated DGIB team is extremely sensitive to the impact of time on Veterans and beneficiaries. Delays in processing could drive a semester or entire academic year-long delay for some students as some degree completion or accelerated graduate programs only start once a

year. These delays are not just start dates for school, they are delays in pursuing dreams and achieving life goals.

Recommendations

Two closely aligned recommendations can strengthen VA's ability to deliver modern services while improving the transparency and credibility of major investments. The first is the creation of a sufficiently resourced enterprise-level cost estimating capability, and second, the development of a streamlined early acquisition model that produces the data required for informed cost estimates. Together, they improve both the speed and rigor of VA's modernization efforts.

A dedicated, enterprise-level cost estimating capability at VA would give Congress and VA leadership consistent, independent, and defensible lifecycle cost estimates that strengthen budget formulation and major investment decisions. By validating program office estimates, establishing authoritative cost baselines, and providing transparent affordability analysis, this organization would reduce cost and schedule risk while improving oversight readiness and ensuring resources are aligned to outcomes that matter for Veterans.

This capability should be paired with a streamlined early acquisition model that accelerates delivery of benefits, healthcare, and services while generating the structured data needed for credible cost

estimation. Rapid operational need definition, minimum viable requirements, early risk scans, and lightweight architecture work would shorten pre-award timelines and produce clear inputs such as preliminary requirements, solution concepts, and early cost drivers that feed the enterprise cost estimating organization.

Together, these reforms enable VA to deliver modern capabilities faster while grounding every major investment in transparent, data-driven analysis.

In closing, let me just note that of MITRE's roughly 6,500 personnel, over 1,100 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.