



## Accessible Version

March 28, 2019

The Honorable Robert Wilkie  
Secretary  
U.S. Department of Veterans Affairs

### Priority Open Recommendations: Department of Veterans Affairs

Dear Mr. Secretary:

The purpose of this report is to provide an update on the overall status of the U.S. Department of Veterans Affairs' (VA) implementation of GAO's recommendations, and to call your continued personal attention to areas where open recommendations should be given high priority.<sup>1</sup> In November 2018, we reported that on a government-wide basis, 77 percent of our recommendations made 4 years ago were implemented.<sup>2</sup> VA's recommendation implementation rate was 90 percent. As of January 9, 2019, VA had 223 open recommendations. Fully implementing these open recommendations could significantly improve VA's operations.

We identified 26 priority recommendations in 2018, and since April 2018, VA has implemented 5 of our 26 open priority recommendations. In doing so, VA has enhanced benefits and services for veterans readjusting to civilian life, begun holding VA medical centers accountable for assessing the competencies of its human resources staff, improved its ability to manage a major information technology (IT) project, and improved the quality of data used to make benefit decisions for veterans. As a result of these efforts, VA improved oversight and accountability, and made progress in addressing long-standing challenges with providing health care and other VA services to veterans. In addition to the 5 recommendations that VA has implemented, we closed 1 priority recommendation as unimplemented, because it was based on a program that has recently undergone significant statutory changes.

VA has 20 priority recommendations remaining from those we identified in the 2018 letter. We ask your continued attention on these remaining recommendations. In total, we are adding 10 new recommendations as priorities this year related to community health care, electronic health records, physician recruitment, opioid safety, employee protections from retaliation, and burial options. This brings the total number of priority recommendations to 30. (See enclosure I for the list of these 30.)

As you know, in March we issued our biennial update to our high-risk program, which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement;

---

<sup>1</sup>Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operation, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a High Risk or duplication issue.

<sup>2</sup>GAO, *Performance and Accountability Report: Fiscal Year 2018*, [GAO-19-1SP](#) (Washington, D.C.: Nov. 15, 2018).

or the need for transformation to address economy, efficiency, or effectiveness challenges.<sup>3</sup> Our high-risk program has served to identify and help resolve serious weaknesses in areas that involve substantial resources and provide critical service to the public.

Two of our high-risk areas—managing risks and improving VA health care and VA acquisition management—center directly on VA. Several other government-wide high-risk areas including (1) improving and modernizing federal disability programs, (2) improving the management of IT acquisitions and operations, (3) strategic human capital management, (4) managing federal real property, and (5) government-wide personnel security clearance process, also have direct implications for VA and its operations. We also want to call your attention to one additional government-wide high risk area that has direct implications for VA and its operations: ensuring the cybersecurity of the nation. We especially encourage you to give attention to GAO’s recommendations related to improving VA’s cybersecurity controls, which specifically call for the department to conduct security control assessments and develop a continuous monitoring strategy. Continued vigilance in this area is needed. We urge your attention to the VA and government-wide high-risk issues as they relate to VA. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget (OMB), and the leadership and staff in agencies, including within VA.<sup>4</sup>

The 30 priority recommendations fall into the following nine areas.

### Veterans’ Access to Timely Health Care.

Access to timely primary care medical appointments is critical to ensuring that veterans obtain needed medical care, because primary care is a gateway to obtaining other health care services from the Veterans Health Administration (VHA), including specialty care. Since 2012, we and others have expressed concerns about VHA’s difficulties in providing timely access to care and effectively oversee timely access to health care for veterans, including primary care.

We have five priority recommendations to improve VHA’s oversight of veterans’ access to timely health care. We recommended that VA

- (1) monitor the full amount of time newly enrolled veterans wait for primary care,
- (2) improve the reliability of wait time measures,
- (3) ensure staff complete training on VHA’s scheduling process,
- (4) develop a standard procedure that defines the roles and responsibilities of VA medical centers in resolving pending applications for the enrollment of veterans in VA health care benefits, and
- (5) clearly define oversight roles and responsibilities to help ensure timely processing of enrollment applications for health care benefits.

Among other steps required to fully implement these recommendations, VA needs to provide documentation that staff have been trained on its new scheduling procedures and enhanced scheduling system, and finish updating its policy that establishes the requirements for processing enrollment applications.

---

<sup>3</sup>GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: Mar. 6, 2019).

<sup>4</sup>For a full discussion of the Managing Risks and Improving VA Health Care; VA Acquisition Management; Improving and Modernizing Federal Disability Programs; Improving the Management of IT Acquisitions and Operations; Strategic Human Capital Management; Managing Federal Real Property; Government-wide Personnel Security Clearance Process; and Ensuring the Cybersecurity of the Nation high risk areas, see pages 275 to 282, 210 to 216, 259 to 266, 123 to 127, 75 to 77, 78 to 85, 170 to 177, and 178 to 184, respectively, of our 2019 high risk report.

## Veterans' Community Care Program.

In response to longstanding concerns about the ability of VHA to provide health care services to veterans in a timely manner, the Choice Program was enacted in 2014 to allow veterans to obtain health care services from community-based providers when they faced long wait times, lengthy travel distances, or other challenges accessing care at VHA medical facilities.<sup>5</sup> Since the program's implementation, we and others have highlighted programmatic weaknesses in the operation and oversight of VHA's Choice Program, such as delays in scheduling appointments and a lack of timely payments to community-based providers. In response to the VA MISSION Act, VA plans to establish a permanent Veterans Community Care Program in 2019, and will need to ensure that veterans receive timely and quality care and that community providers are paid in a timely manner.<sup>6</sup>

We have five priority recommendations to improve veterans' community care. We recommended that VA

- (1) establish an achievable wait-time goal that allows it to monitor whether veterans are receiving VA community care within time frames that are comparable to VHA facilities;
- (2) design an appointment scheduling process for community care that establishes time frames for processing, scheduling, and receiving care;
- (3) establish a system to help facilitate information sharing among VA medical centers, veterans, and others for the purpose of care coordination;
- (4) monitor female veterans' access to key sex-specific care services—mammography, maternity care, and gynecology—under community care contracts; and
- (5) develop a sound written plan that includes schedules, costs, and goals for modernizing its claims system for paying community providers.

Among other steps required to fully implement these recommendations, VA needs to provide documentation that VHA has established wait-time goals for veterans receiving care in the community. These goals should be similar to the wait-time goals in VHA facilities.

## Human Capital Management.

A strong workforce capable of providing quality and timely care to veterans is critical to the success of VA. Over the past two decades, we and others have expressed concern about certain VA human capital practices. For example, we reported in 2017 that VHA lacks needed information to improve the recruitment and retention of quality physicians, such as information about the effectiveness of its existing recruitment and retention strategies. In addition, we reported in 2018 that VA lacks complete data about employee misconduct and disciplinary actions. Misconduct by VA employees can have serious consequences for veterans, including poor quality of care.

We have eight priority recommendations to improve VA's ability to recruit and retain quality physicians and nurses, and to improve its employee misconduct policies. We recommended that VA

---

<sup>5</sup>Veterans Access, Choice, and Accountability Act of 2014, Pub. L. No. 113-146, § 101, 128 Stat. 1754, 1755-1765 (2014).

<sup>6</sup>VA MISSION Act of 2018, Pub. L. No. 115-182, 132 Stat. 1393 (2018).

- (1) develop a process to accurately count all physicians providing care at each VA medical center,
- (2) conduct an evaluation of the effectiveness of physician recruitment and retention strategies used by VA medical centers,
- (3) conduct an evaluation of the effectiveness of VHA's key nurse recruitment and retention initiatives,
- (4) develop a modern and effective performance management system in which VA managers make meaningful distinctions in employees' performance ratings,
- (5) ensure that ratings-based performance awards are administered in a manner that is consistent with leading practices,
- (6) develop a plan to implement a modern IT system to support employee performance management processes,
- (7) collect complete and reliable misconduct and associated disciplinary action data, and
- (8) ensure that employees who report wrongdoing are treated fairly and protected against retaliation.

Among other steps required to fully implement these recommendations, VA needs to complete its review of physician recruitment and retention incentives, and document its plans to monitor the implementation of any recommendations resulting from its review. VA also needs to provide evidence of new guidance on the collection of employee misconduct data that addresses limitations, such as a lack of standardized data fields.

### Information Technology.

The use of IT is crucial to helping VA effectively serve the nation's veterans, and each year the department spends over \$4 billion on IT. However, over many years, VA has had difficulty managing its information systems, such as the Veterans Benefits Management System that VA uses to process disability benefits, and has faced challenges consolidating and closing data centers. As a result, we and others have raised questions about the efficiency and effectiveness of VA's IT operations and its ability to deliver intended outcomes needed to help advance the department's mission. In addition, we have long reported on the department's efforts to share the electronic health records of servicemembers and veterans with the Department of Defense (DOD), including the involvement of the DOD and VA Interagency Program Office in these efforts, and VA's plans to acquire a new electronic health record system.

We have three priority recommendations to improve VA's management of its information systems and acquisition of a new electronic health record system. We recommended that (1) VA's implementation of the Veterans Benefits Management System for processing disability benefits be improved with additional planning and cost estimation, (2) VA improve its efforts to consolidate and close data centers, and (3) VA clearly define the role and responsibilities of the Interagency Program Office in the governance plans for acquisition of its new electronic health record system. Among other steps required to fully implement these recommendations, VA needs to estimate the cost to complete the Veterans Benefits Management System and provide a schedule of the activities needed to achieve the completion dates for the system.

### Appeals Reform for Disability Benefits.

In recent years the number of appeals of VA's disability benefit decisions has been rising. The Veterans Appeals Improvement and Modernization Act of 2017 requires changes to VA's current (legacy) appeals process, giving veterans new options to have their claims reviewed

further.<sup>7</sup> In 2018, we reported that VA's plan for implementing a new disability appeals process did not explain how VA would assess the new process compared to the legacy process, and did not fully address risks associated with implementing a new process.

We have two priority recommendations to improve VA's disability benefit appeals process. We recommended that VA (1) clearly articulate in its appeals plan how it will monitor and assess the new appeals process compared to the legacy process, and (2) ensure that its appeals plan more fully addresses related risks, given the uncertainties associated with implementing a new process. Among other steps required to fully implement these recommendations, VA needs to establish a balanced set of performance goals and measures for all new options to assess how well the new appeals process is performing, and assess risks associated with appeals reform against a balanced set of goals. Moreover, many of the principles of sound planning practices that informed our recommendations remain relevant, even after implementation, to ensure the new process meets veterans' needs.

### Quality of Care and Patient Safety.

As in all health care delivery settings, VA medical centers are responsible for ensuring that their providers deliver safe, high quality care to patients. In recent years, we have raised concerns about the quality of care delivered in VA medical centers. For example, in 2018, we found inconsistent adherence to opioid risk mitigation strategies at selected VA medical centers, such as not conducting urine screenings to determine if veterans are taking their opioid medications as prescribed, and several contributing factors, such as not having a designated primary care provider knowledgeable about pain care to help providers adhere to these strategies.

We have three priority recommendations to improve the quality and safety of health care delivered in VA medical centers. We recommended that VHA (1) oversee VA medical centers' reviews of providers with identified clinical care concerns, (2) establish a process for overseeing VA medical centers to ensure that they are reporting such providers to the National Practitioner Data Bank and to the states where the providers are licensed in a timely manner, and (3) ensure that all Veterans Integrated Service Networks have implemented an academic detailing program and that all VA medical centers have a designated primary care pain champion. Among other steps required to fully implement these recommendations, VHA needs to complete revisions to its standardized auditing tool so that it directs the Veterans Integrated Service Networks to oversee the review of providers with care concerns, and to ensure timely reporting of such providers to the National Practitioner Data Bank and their states of licensure.

### National Policy Documents.

To help carry out its mission of providing timely and high-quality health care to veterans, it is important that VHA develop and communicate national policies throughout the organization and ensure their appropriate implementation. Our work, along with that of VA's Office of Inspector General and others, has cited longstanding concerns about VA's oversight of its health care system, including concerns related to ambiguous policies and inconsistent processes. Specifically, we have found that ambiguous policies have led to inconsistencies in the way VA medical centers operate at the local level, posing risks for veterans' access to health care and

---

<sup>7</sup>Pub. L. No. 115-55, 131 Stat. 1105 (2017).

for the quality and safety of that care. At the national level, VHA has used a variety of document types to establish policy or to provide implementation guidance to its facilities. In September 2017, we issued a report on VHA's policy management. We found that, contrary to its new national policy definitions, VHA continues to issue national policy through program office memos that lack vetting and are not subject to recertification.

We have one priority recommendation to clarify when and for what purposes each national policy and guidance document type should be used, including whether guidance documents should be vetted and recertified. Among other steps required to fully implement this recommendation, VHA needs to complete revisions to its national policy directive, which should clarify the use of national policy and guidance documents, as well as their recertification requirements.

### Contracting Policies and Practices.

Our prior reports have found shortcomings with VA's procurement policy framework and its management of certain procurement programs. In September 2016, we reported that VA's procurement policies were outdated and fragmented, posing challenges for its acquisition workforce. For instance, VA's acquisition regulation had not been updated since 2008. Additionally, in November 2017, we reported that VA did not have a documented overall strategy for its new Medical Surgical Prime Vendor-Next Generation program, which delivers more than \$450 million of supplies to medical centers annually.

We have two priority recommendations to improve VA's contracting policies and practices. We recommended that VA (1) take steps to expedite completion of its updated acquisition regulation, and (2) document its strategy for its new Medical Surgical Prime Vendor-Next Generation program, and that it communicate this plan to all stakeholders. To fully implement these recommendations, VA needs to complete issuance of the revised acquisition regulation and provide documentation on the extent to which clinicians are involved in prioritizing categories of supplies for future phases of developing requirements and contracting for its Medical Surgical Prime Vendor program.

### Veterans' Access to Burial Options.

In 2013, Congress required that VA develop a strategy to serve the burial needs of rural veterans, including a reassessment of gaps in service factoring in conditions that limit rural veteran burial options.<sup>8</sup> We reported in 2014 that VA's use of county-level data to determine whether veterans have reasonable access to a burial option led to less precision than if VA used census-tract population data.

We have one priority recommendation to more accurately determine whether veterans have reasonable access to burial options at veterans' cemeteries, and to make better-informed decisions concerning where to locate new cemeteries. We recommended that VA estimate the served and unserved veteran populations using census tract data. Among other steps required to fully implement this recommendation, VA should use census tract data with VA's own mapping software to estimate the number of veterans living within service areas.

- - - - -

---

<sup>8</sup>Consolidated and Further Continuing Appropriations Act, 2013, Pub. L. No. 113-6, 127 Stat. 198 (2013).

Copies of this report are being sent to the Director of OMB and appropriate congressional committees; the Committees on Appropriations, Budget, and Homeland Security and Governmental Affairs, United States Senate; and the Committees on Appropriations, Budget, and Oversight and Reform, House of Representatives. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

I appreciate VA's continued commitment to these important issues and communicating to VA leaders the importance of addressing GAO's recommendations. If you have any questions or would like to discuss any of the issues outlined in this report, please do not hesitate to contact me or A. Nicole Clowers, Managing Director, Health Care at [clowersa@gao.gov](mailto:clowersa@gao.gov) or 202-512-7114. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report include Marcia Mann (Assistant Director), Katie McConnell (Analyst-in-Charge), Pamela Dooley, and Jacquelyn Hamilton. Our teams will continue to coordinate with your staff on all of the 223 open recommendations. Thank you for your attention to these matters.

Sincerely yours,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is written in a cursive, flowing style with a long horizontal stroke extending to the right.

Gene L. Dodaro  
Comptroller General  
of the United States  
Enclosure

cc: Dr. Paul R. Lawrence, Under Secretary for Benefits, VA  
Mr. Randy C. Reeves, Under Secretary for Memorial Affairs, VA  
Dr. Richard A. Stone, Executive in Charge, VHA  
Mr. Daniel R. Sitterly, Assistant Secretary for Human Resources and Administration/Operations, Security, and Preparedness, VA  
Mr. James P. Gfrerer, Assistant Secretary for Information and Technology and Chief Information Officer, VA  
Ms. Karen Brazell, Principal Executive Director and Chief Acquisition Officer, Office of Acquisition, Logistics and Construction, VA  
Mr. Spencer Roberts, Director, Healthcare Commodity Program Office, Procurement and Logistics Office, VHA

**Enclosure: Priority Open Recommendations to the Department of Veterans Affairs**

**Improving Oversight of Veterans' Access to Timely Health Care**

***VA Health Care: Actions Needed to Improve Newly Enrolled Veterans' Access to Primary Care. GAO-16-328. Washington, D.C.: March 18, 2016.***

**Recommendation:** The Secretary of Veterans Affairs (VA) should direct the Under Secretary for Health to monitor the full amount of time newly enrolled veterans wait to be seen by primary care providers, starting with the date veterans request they be contacted to schedule appointments. This could be accomplished, for example, by building on the data collection efforts currently being implemented under the "Welcome to VA" program.

**Action Needed:** VA agreed with our recommendation. To fully implement this recommendation, VA needs to capture the application date for all newly enrolled veterans, which VA has indicated it intends to do by December 2019.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Director:** Debra A. Draper, Health Care

**Contact information:** [draperd@gao.gov](mailto:draperd@gao.gov) or (202) 512-7114

***VA Health Care: Reliability of Reported Outpatient Medical Appointment Wait Times and Scheduling Oversight Need Improvement. GAO-13-130. Washington, D.C.: December 21, 2012.***

**Recommendation:** To ensure reliable measurement of veterans' wait times for medical appointments, we recommend that the Secretary of VA direct the Under Secretary for Health to take actions to improve the reliability of wait time measures either by clarifying the scheduling policy to better define the desired date, or by identifying clearer wait time measures that are not subject to interpretation and prone to scheduler error.

**Recommendation:** To better facilitate timely medical appointment scheduling and improve the efficiency and oversight of the scheduling process, we recommend that the Secretary of VA direct the Under Secretary for Health to take actions to ensure that VA medical centers (VAMC) consistently and accurately implement the Veterans Health Administration's (VHA) scheduling policy, including use of the electronic wait list, as well as ensuring that all staff with access to the VistA scheduling system complete the required training.

**Actions Needed:** VA agreed with both of our recommendations. To fully implement these recommendations, VA needs to provide documentation of completed training for all staff authorized to schedule appointments, including a national reconciliation of the list of staff who schedule appointments against the number of staff that have completed scheduling training. VA has reported that it plans to complete this reconciliation or have an action plan in place in March 2019. Overall, VA must demonstrate—and provide supporting evidence—that the scheduling policy and wait time measures ensure accurate and reliable measurement and reporting of veterans' appointment wait times, and improve the efficiency and oversight of the scheduling process.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Director:** Debra A. Draper, Health Care

**Contact information:** [draperd@gao.gov](mailto:draperd@gao.gov) or (202) 512-7114

**VA Health Care: Opportunities Exist for Improving Implementation and Oversight of Enrollment Processes for Veterans. GAO-17-709. Washington, D.C.: September 5, 2017.**

**Recommendation:** The Secretary of VA should direct the Acting Under Secretary for Health to develop and disseminate a system-wide standard operating procedure that clearly defines the roles and responsibilities of VAMCs in resolving pending enrollment applications.

**Recommendation:** The Secretary of Veterans Affairs should direct the Acting Under Secretary for Health to clearly define oversight roles and responsibilities for the Health Eligibility Center (HEC), and for Veterans Integrated Service Networks (VISN), as appropriate, to help ensure timely processing of applications and accurate enrollment determinations.

**Actions Needed:** VA agreed with our recommendations. To fully implement these recommendations, VA needs to finish updating its policy that establishes requirements for processing enrollment applications. VA's policy needs to identify specific key performance indicators to be used to assess whether enrollment accuracy and timeliness standards are being met, and provide us documentation of these indicators. In addition, VA needs to provide documentation of the roles of HEC and VISNs in overseeing VAMCs' performance relative to the standards. VA also needs to provide us with documentation that clarifies what role VAMCs will have, if any, in resolving pending enrollment applications.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Director:** Debra A. Draper, Health Care

**Contact information:** [draperd@gao.gov](mailto:draperd@gao.gov) or (202) 512-7114

**Improving Oversight of Veterans' Community Care Program**

**Veterans Choice Program: Improvements Needed to Address Access-Related Challenges as VA Plans Consolidation of its Community Care Programs. GAO-18-281. Washington, D.C.: June 4, 2018.**

**Recommendation:** The Under Secretary for Health should establish an achievable wait-time goal for the consolidated community care program that VA plans to implement that will permit VHA to monitor whether veterans are receiving VA community care within time frames that are comparable to the amount of time they would otherwise wait to receive care at VHA medical facilities.

**Recommendation:** The Under Secretary for Health should design an appointment scheduling process for the consolidated community care program that VA plans to implement that sets forth time frames within which (1) veterans' referrals must be processed, (2) veterans' appointments must be scheduled, and (3) veterans' appointments must occur, which are consistent with the wait-time goal VHA has established for the program.

**Recommendation:** The Secretary of VA should establish a system for the consolidated community care program VA plans to implement to help facilitate seamless, efficient information sharing among VAMCs, VHA clinicians, third party administrators (TPA), community providers, and veterans. Specifically, this system should allow all of these entities to electronically exchange information for the purposes of care coordination.

**Actions Needed:** VA agreed with our recommendations. To fully implement these recommendations, VHA will need to take the following actions: (1) establish community care program wait-time goals; (2) design an appointment scheduling process for community care that

is in keeping with these established wait-time goals that outlines time frames for completion of the various steps in the appointment scheduling process, such as when referrals must be processed, appointments scheduled, and veterans seen by the provider; (3) measure the timeliness of veterans seen in VHA medical facilities and by community care providers; (4) determine if veterans are receiving VA community care within time frames that are comparable to the amount of time they would otherwise wait to receive care at VHA medical facilities; and (5) develop a tool that would facilitate the electronic exchange of administrative and clinical information between VHA, the TPAs, and community providers.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Acting Director:** Sharon M. Silas, Health Care

**Contact information:** [silass@gao.gov](mailto:silass@gao.gov), (202) 512-7114

***VA Health Care: Improved Monitoring Needed for Effective Oversight of Care for Women Veterans. GAO-17-52. Washington, D.C.: December 2, 2016.***

**Recommendation:** To improve care for women veterans, we recommend that the Secretary of VA direct the Under Secretary for Health to monitor women veterans' access to key sex-specific care services—mammography, maternity care, and gynecology—under current and future community care contracts. For those key services, monitoring should include an examination of appointment scheduling and completion times, driving times to appointments, and reasons appointments could not be scheduled with community providers.

**Action Needed:** VA agreed with our recommendation. To fully implement this recommendation, VHA needs to provide documentation that, as a part of all future community care programs, there is a plan (with time frames, data analyzed, and actions taken) relating to the monitoring of women's health services (specifically, gynecology, maternity care, and mammography) for timely appointment scheduling, timely completion times, driving times to appointments, and reasons appointments could not be scheduled with community providers.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Acting Director:** Sharon M. Silas, Health Care

**Contact information:** [silass@gao.gov](mailto:silass@gao.gov), (202) 512-7114

***Veterans' Health Care: Proper Plan Needed to Modernize System for Paying Community Providers. GAO-16-353. Washington, D.C.: May 11, 2016.***

**Recommendation:** To help provide reasonable assurance that VHA achieves its long-term goal of modernizing its claims processing system, the Secretary of VA should direct the Under Secretary for Health to ensure that the agency develops a sound written plan that includes the following elements: (1) a detailed schedule for when VHA intends to complete development and implementation of each major aspect of its new claims processing system; (2) the estimated costs for implementing each major aspect of the system; and (3) the performance goals, measures, and interim milestones that VHA will use to evaluate progress, hold staff accountable for achieving desired results, and report to stakeholders the agency's progress in modernizing its claims processing system.

**Action Needed:** VA agreed with our recommendation. VHA's Office of Community Care is consolidating VA's community care programs, and as part of this process it plans to transition to a third party administrator for the purposes of claims processing. While an active procurement is underway, VHA still needs to develop a written plan to fully implement this recommendation.

VHA's written plan must include details about the schedule, cost estimates, performance goals, and interim milestones associated with transitioning to a third party administrator for the purposes of processing claims for VA community care.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Acting Director:** Sharon M. Silas, Health Care

**Contact information:** [silass@gao.gov](mailto:silass@gao.gov), (202) 512-7114

### Improving Management of Human Capital

**Veterans Health Administration: Better Data and Evaluation Could Help Improve Physician Staffing, Recruitment, and Retention Strategies. GAO-18-124. Washington, D.C.: October 19, 2017.**

**Recommendation:** The Under Secretary for Health should develop and implement a process to accurately count all physicians providing care at each medical center, including physicians who are not employed by VHA.

**Recommendation:** The Under Secretary for Health should conduct a comprehensive, system-wide evaluation of the physician recruitment and retention strategies used by VAMCs to determine their overall effectiveness, identify and implement improvements, ensure coordination across VHA offices, and establish an ongoing monitoring process.

**Actions Needed:** VA disagreed with the first recommendation. Although VA responded to our report by stating that the ability to count physicians does not affect its ability to assess workload, we continue to believe that VHA needs a systematic process that is available at the local level to identify all physicians working at VA medical centers as part of the agency's efforts to monitor and assess workload. To implement the first recommendation, VHA needs to develop a system-wide process to collect workload information on all physicians providing care at VAMCs, including physicians that are not employed by VHA. This information should be available at the local level for workforce planning purposes. VA agreed with the second recommendation. According to VHA, the agency started a review of physician recruitment, retention, and relocation incentives in October 2017 that will include recommendations for a systematic approach to allocating workforce management resources, such as the Education Debt Reduction Program. Once completed, VHA will need to provide documentation of the review and its plans to monitor the implementation of any recommendations that will come out of the review to fully implement the second recommendation.

**High Risk Area:** Managing Risks and Improving VA Health Care, Strategic Human Capital Management

**Director:** Debra A. Draper, Health Care

**Contact information:** [draperd@gao.gov](mailto:draperd@gao.gov), (202) 512-7114

**VA Health Care: Oversight Improvements Needed for Nurse Recruitment and Retention Initiatives. GAO-15-794. Washington, D.C.: September 30, 2015.**

**Recommendation:** To help ensure the effective recruitment and retention of nurses across VAMCs, the Secretary of VA should direct the Under Secretary for Health to conduct a system-wide evaluation of VHA's key nurse recruitment and retention initiatives to determine the overall effectiveness of these initiatives, including any needed improvements, and communicate results and information in a timely manner to relevant stakeholders.

**Action Needed:** VA agreed with our recommendation and reported to us that VHA efforts continue to be ongoing to address this recommendation. To fully implement this recommendation, VHA will need to provide documentation that VHA has conducted a system-wide evaluation of its key nurse recruitment and retention initiatives. This documentation should describe needed improvements, how these efforts as a whole help VHA meet its overall nurse recruitment and retention goals, and how this information has been communicated to relevant stakeholders.

**High Risk Area:** Managing Risks and Improving VA Health Care, Strategic Human Capital Management

**Director:** Debra A. Draper, Health Care

**Contact information:** [draperd@gao.gov](mailto:draperd@gao.gov), (202) 512-7114

**Veterans Health Administration: Management Attention Is Needed to Address Systemic, Long-standing Human Capital Challenges. GAO-17-30. Washington, D.C.: December 23, 2016.**

**Recommendation:** To accelerate efforts to develop a modern, credible, and effective performance management system, the Assistant Secretary for Human Resources and Administration (HR&A), with input from VHA stakeholders, should ensure that meaningful distinctions are being made in employee performance ratings by (1) developing and implementing a standardized, comprehensive performance management training program for supervisors of Title 5, Title 38, and Title 38-Hybrid employees based on leading practices, and ensuring procedures are in place to support effective performance conversations between supervisors and employees; (2) reviewing and revising Title 5 and Title 38 performance management policies consistent with leading practices (e.g., require definition of all performance levels); and (3) developing and implementing a process to standardize performance plan elements, standards, and metrics for common positions across VHA that are covered under VA's Title 5 performance management system.

**Actions Needed:** VA partially agreed with our recommendation, but has made limited overall progress in ensuring that meaningful distinctions are being made in employee performance ratings. To implement our recommendation, VA must (1) identify and implement procedures to better support ongoing and effective performance conversations between supervisors and employees; (2) review and revise performance management policies consistent with leading human capital practices to ensure meaningful distinctions in employee performance; and (3) standardize employee performance plan elements, standards, and metrics for common positions across the VHA.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Recommendation:** To accelerate efforts to develop a modern, credible, and effective performance management system, the Assistant Secretary for HR&A should, with input from VHA stakeholders, ensure that ratings-based performance awards are administered in a manner that is consistent with leading practices and promotes improved employee performance.

**Action Needed:** VA partially agreed with our recommendation and as of December 2018 had taken steps to help ensure that ratings-based performance awards are administered in a manner that is consistent with leading practices and that promotes improved employee performance. To implement our recommendation, VA must ensure that new procedures for administering performance awards are fully implemented across VHA medical centers.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Recommendation:** To accelerate efforts to develop a modern, credible, and effective performance management system, the Assistant Secretary for HR&A should, with input from VHA stakeholders, develop a plan for how and when it intends to implement a modern information technology (IT) system to support employee performance management processes.

**Action Needed:** VA partially agreed with this recommendation and as of December 2018 had established a project team to identify business requirements, analyze alternatives for an employee performance management IT system, and develop an implementation plan. VA also provided us with a high-level national proposal for acquiring a new performance management IT system.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Director:** Robert Goldenkoff, Strategic Issues

**Contact information:** [goldenkoffr@gao.gov](mailto:goldenkoffr@gao.gov), (202) 512-2757

**Department of Veterans Affairs: Actions Needed to Address Employee Misconduct Process and Ensure Accountability. GAO-18-137. Washington, D.C.: July 19, 2018.**

**Recommendation:** The Secretary of VA should develop and implement guidance to collect complete and reliable misconduct and associated disciplinary-action data department-wide, whether through a single information system, or multiple interoperable systems. Such guidance should include direction and procedures on addressing blank data fields, lack of personnel identifiers, and standardization among fields, and on accessibility.

**Action Needed:** VA agreed with our recommendation. To fully implement this recommendation, VA must provide evidence of a new policy and information system. The policy must include procedures on addressing the lack of personnel identifiers, blank data fields, standardization among data fields, and accessibility. VA's target date for system implementation is January 2020.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Recommendation:** The Secretary of VA should ensure that employees who report wrongdoing are treated fairly and protected against retaliation.

**Actions Needed:** VA agreed with our recommendation. To fully implement this recommendation, VA needs to provide evidence of actions taken to ensure that whistleblower protections included in law are implemented. Such actions include (1) establishing guidance for implementation of the law; (2) delegating authority to implement the law; and (3) hiring additional staff to increase awareness of whistleblower protections and assist individual disclosing employees.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Director:** Kathy Larin, Forensic Audits and Investigative Service

**Contact Information:** [larink@gao.gov](mailto:larink@gao.gov), (202) 512- 5045

## Improving Management of Information Technology

**Veterans Benefits Management System: Ongoing Development and Implementation Can Be Improved; Goals Are Needed to Promote Increased User Satisfaction. GAO-15-582. Washington, D.C.: September 1, 2015.**

**Recommendation:** To improve VA's efforts to effectively complete the development and implementation of the Veterans Benefits Management System (VBMS), the Secretary of VA should direct the Under Secretary for Benefits and the Chief Information Officer to develop an updated plan for VBMS that includes (1) a schedule for when the Veterans Benefits Administration intends to complete development and implementation of the system, including capabilities that fully support disability claims, pension claims, and appeals processing; and (2) the estimated cost to complete development and implementation of the system.

**Action Needed:** VA agreed with our recommendation and subsequently provided us with expected completion dates for implementation of claims and appeals processing. To fully implement this recommendation, the department needs to provide a schedule of the activities necessary to achieve these completion dates, and estimate the cost to complete development and implementation of VBMS.

**High Risk Area:** Improving the Management of IT Acquisitions and Operations

**Director:** Carol C. Harris, Information Technology Acquisition Management Issues

**Contact information:** [harriscc@gao.gov](mailto:harriscc@gao.gov), (202) 512-4456

**Data Center Consolidation: Agencies Making Progress, but Planned Savings Goals Need to Be Established. GAO-16-323. Washington, D.C.: March 3, 2016.**

**Recommendation:** The Secretary of VA should take action to improve progress in the data center optimization areas that we reported as not meeting the Office of Management and Budget's (OMB) established targets, including addressing any identified challenges.

**Action Needed:** VA agreed with our recommendation. While OMB no longer requires reporting on seven of the nine metrics against which VA was originally assessed, progress against the remaining two metrics is needed to fully implement this recommendation. It is important that VA accurately report data center optimization progress to OMB and improve departmental progress against meeting these metrics to ensure that OMB and Congress have the ability to oversee VA's progress against key data center optimization goals.

**High Risk Area:** Improving the Management of IT Acquisitions and Operations

**Director:** Carol C. Harris, Information Technology Acquisition Management Issues

**Contact information:** [harriscc@gao.gov](mailto:harriscc@gao.gov), (202) 512-4456

**Electronic Health Records: Clear Definition of the Interagency Program Office's Role in VA's New Modernization Effort Would Strengthen Accountability. GAO-18-696T. Washington, D.C.: September 13, 2018.**

**Recommendation:** The Secretary of VA should ensure that the role and responsibilities of the Interagency Program Office are clearly defined within the governance plans for acquisition of the department's new electronic health record system.

**Action Needed:** VA agreed with our recommendation. To fully implement this recommendation, VA needs to document the role and responsibilities of the Interagency Program Office with respect to VA's acquisition of its new electronic health record system, explaining the role, if any, the Interagency Program Office will have in the governance process.

**High Risk Area:** Improving the Management of IT Acquisitions and Operations

**Director:** Carol C. Harris, Information Technology Acquisition Management Issues

**Contact information:** [harriscc@gao.gov](mailto:harriscc@gao.gov), (202) 512-4456

## Improving Appeals Reform for Disability Benefits

***VA Disability Benefits: Improved Planning Practices Would Better Ensure Successful Appeals Reform. GAO-18-352. Washington, D.C.: March 22, 2018.***

**Recommendation:** The Secretary of VA should clearly articulate in VA's appeals plan how VA will monitor and assess the new appeals process compared to the legacy process, including specifying a balanced set of goals and measures—such as timeliness goals for all the Veterans Benefits Administration (VBA) appeals options and the Board of Veterans' Appeals (Board) dockets, and measures of accuracy, veteran satisfaction, and cost—and related baseline data.

**Actions Needed:** VA agreed with our recommendation. To fully implement this recommendation, VA needs to establish a balanced set of performance goals for all new appeals options and a balanced set of measures—including overall timeliness, accuracy, and productivity—as well as a system to assess how well the new process is performing relative to the legacy process.

**Recommendation:** The Secretary of VA should ensure that the appeals plan more fully addresses risk associated with appeals reform—for example, by assessing risks against a balanced set of goals and measures, articulating success criteria and an assessment plan for the Rapid Appeals Modernization Program (RAMP), and testing or conducting sensitivity analyses of all appeal options—prior to fully implementing the new appeals process.

**Actions Needed:** VA agreed with our recommendation. To fully implement our recommendation, VA will need to assess risk against a balanced set of goals, articulate success criteria for assessing results of pilot tests for the new process (e.g., "RAMP"), and test or conduct sensitivity analyses of all appeal options before proceeding to full implementation.

**High Risk Area:** Improving and Modernizing Federal Disability Programs

**Director:** Elizabeth Curda, Education, Workforce, and Income Security

**Contact information:** [curdae@gao.gov](mailto:curdae@gao.gov), (202) 512-7215

## Improving Oversight to Ensure Safe, High Quality Care for Veterans

***VA Health Care: Improved Policies and Oversight Needed for Reviewing and Reporting Providers for Quality and Safety Concerns. GAO-18-63. Washington, D.C.: November 15, 2017.***

**Recommendation:** The Under Secretary for Health should require VISN officials to oversee VAMC reviews of providers' clinical care after concerns have been raised, including retrospective and comprehensive reviews, and ensure that VISN officials are conducting such oversight with the required standardized audit tool. This oversight should include reviewing

documentation in order to ensure that these reviews are documented appropriately and conducted in a timely manner.

**Recommendation:** The Under Secretary for Health should require VISN officials to establish a process for overseeing VAMCs to ensure that they are reporting providers to the National Practitioner Data Bank (NPDB) and state licensing boards (SLB), and are reporting in a timely manner.

**Actions Needed:** VA agreed with our recommendations. To fully implement these recommendations, VHA needs to complete revisions to the standardized audit tool so that it directs the VISNs to (1) oversee reviews of providers' clinical care after concerns have been raised; and (2) ensure timely reporting to the NPDB and SLBs, in accordance with VHA policy. VHA also needs to implement the VISN-level oversight of all 170 VAMCs using the revised tool, review the aggregate results, and take corrective actions where deficiencies, trends, or issues are identified. This would include demonstrating that the providers we identified in our review have been reported to the NPDB and SLBs.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Acting Director:** Sharon M. Silas, Health Care

**Contact information:** [silass@gao.gov](mailto:silass@gao.gov), (202) 512-7114

**VA Health Care: Progress Made Towards Improving Opioid Safety, but Further Efforts to Assess Progress and Reduce Risk Are Needed. GAO-18-380. Washington, D.C.: May 29, 2018.**

**Recommendation:** The Under Secretary for Health should ensure that all VISNs have implemented an academic detailing program that supports all medical facilities in the VISN and that all VHA medical facilities have a designated primary care pain champion as required.

**Actions Needed:** VA agreed with our recommendation. To fully implement this recommendation, VHA needs to ensure, as required by VHA policy, that all 18 VISNs have an academic detailing program established that regularly provides education and support to all VHA medical facilities located in the VISN. Also, all VHA medical facilities should have a designated primary care pain champion who is knowledgeable about pain care, and can serve as a resource for other primary care providers by promoting safe and effective pain care. VA reported that it plans to complete both of these actions by April 2019.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Managing Director:** A. Nicole Clowers, Health Care

**Contact information:** [clowersa@gao.gov](mailto:clowersa@gao.gov), (202) 512-7114

## Improving Management of National Policy Documents

**Veterans Health Care: Additional Actions Could Further Improve Policy Management. GAO-17-748. Washington, D.C.: September 22, 2017.**

**Recommendation:** The Under Secretary for Health should further clarify when and for what purposes each national policy and guidance document type should be used, including whether guidance documents, such as program office memos, should be vetted and recertified.

**Actions Needed:** VA agreed with our recommendation. To fully implement this recommendation, VHA needs to provide us with the finalized version of its national policy

directive (recertified VHA Directive 6330), which should clarify the use of national policy and guidance documents, as well as their recertification requirements. For guidance documents, this should include the use, vetting, and recertification of all types of memos, including, but not limited to, 10N memos. VA reported that it plans to complete these actions by June 2019.

**High Risk Area:** Managing Risks and Improving VA Health Care

**Director:** Debra A. Draper, Health Care

**Contact information:** [draperd@gao.gov](mailto:draperd@gao.gov), (202) 512-7114

## Improving Management of Contracting Policies and Practices

***Veterans Affairs Contracting: Improvements in Policies and Processes Could Yield Cost Savings and Efficiency. GAO-16-810. Washington, D.C.: September 16, 2016.***

**Recommendation:** In order to ensure that contracting officers have clear and effective policies as soon as possible, the Secretary of VA should direct the Office of Acquisition and Logistics to identify measures to expedite the revision of the Veterans Affairs Acquisition Regulation, which has been ongoing for many years, and the issuance of the VA Acquisition Manual.

**Action Needed:** VA agreed with our recommendation. To fully implement this recommendation, VA needs to expedite the issuance of its revised VA Acquisition Regulation, as well as the companion VA Acquisition Manual. VA's contracting workforce has been relying on an outdated 2008 version of the Veterans Affairs Acquisition Regulation.

**High Risk Area:** VA Acquisition Management

**Director:** Shelby Oakley, Contracting and National Security Acquisitions

**Contact information:** [oakleys@gao.gov](mailto:oakleys@gao.gov), (202) 512-4841

***Veterans Affairs Contracting: Improvements in Buying Medical and Surgical Supplies Could Yield Cost Savings and Efficiency. GAO-18-34. Washington, D.C.: November 9, 2017.***

**Recommendation:** The Director of the Medical Surgical Prime Vendor-Next Generation (MSPV-NG) program office should, with input from the Strategic Acquisition Center, develop, document, and communicate to stakeholders an overarching strategy for the program, including how the program office will prioritize categories of supplies for future phases of requirement development and contracting.

**Actions Needed:** VA agreed with our recommendation. In February 2019, VA developed a new, overarching acquisition strategy for its MSPV program, and has begun the process of communicating it to key stakeholders. To fully implement this recommendation, VA needs to provide documentation on the extent to which clinicians are involved in prioritizing categories of supplies for future phases of requirement development and contracting.

**High Risk Area:** VA Acquisition Management

**Director:** Shelby Oakley, Contracting and National Security Acquisitions

**Contact information:** [oakleys@gao.gov](mailto:oakleys@gao.gov), (202) 512-4841

## Improving Management of VA's National Cemetery Program

**Veterans Affairs: Data Needed to Help Improve Decisions Concerning Veterans' Access to Burial Options. GAO-14-537. Washington, D.C.: September 9, 2014.**

**Recommendation:** To better enable VA's National Cemetery Administration (NCA) to meet its mission of providing reasonable access to burial options at veterans' cemeteries, the Secretary of VA should direct the Under Secretary for Memorial Affairs to use the capability of NCA's existing software to estimate the served and unserved veteran populations using census tract data.

**Actions Needed:** VA disagreed with our recommendation. Although VA agreed that census tract data was more precise than the county-level data NCA was using, the department disagreed that using this more precise data to make decisions would lead to different outcomes. Instead, VA believed that NCA's methodology of using county-level data was sufficient for estimating the number of served and unserved veterans. We disagree and are skeptical of VA's assertion that using more precise data to identify served and unserved veterans would have no effect on the outcome of VA's decisions about cemetery locations or prioritization. Therefore, we maintain that our recommendation is still valid. To fully implement this recommendation, VA must provide evidence that it is using census tract data with its own mapping software to analyze the number of veterans served.

**Director:** Diana Maurer, Defense Capabilities and Management

**Contact information:** [maurerd@gao.gov](mailto:maurerd@gao.gov), (202) 512-9627

(103210)