

Military Health Care: Information on Use of and Access to Toxic Exposure Records

GAO-26-108483

Q&A Report to Congressional Committees

July 22, 2026

Accessible Version

Why This Matters

Military service members and veterans may experience adverse health outcomes, such as cancer and respiratory diseases, that are possibly associated with toxic exposures during military service. For example, those who deployed to Afghanistan and Iraq after September 11th have reported health concerns from toxic exposures, particularly from smoke and harmful emissions produced by open-air burn pits. In April 2026, the Department of Veterans Affairs (VA) estimated that about 48 percent of veterans who have been screened since 2022 (approximately 3.2 million of 6.8 million total veterans screened) had at least one potential toxic exposure during military service. The Department of Defense (DOD) and VA provide health care to over 9 million beneficiaries (i.e., service members and their families) and over 9 million veterans, respectively. Staff within DOD and two agencies within VA—the Veterans Health Administration (VHA) and Veterans Benefits Administration (VBA)—can use military toxic exposure information to support these and other efforts, including processing claims for disability benefits and conducting research.

In 2019, DOD and VA jointly launched the Individual Longitudinal Exposure Record (ILER) web application, which provides claims benefits staff, clinicians, and researchers with information linking deployment histories, health assessments, and potential toxic exposures. In 2021, federal law required VA to provide veterans with the ability to access their ILER records, and in 2022, federal law required DOD and VA to coordinate to provide veterans with a way to modify their records. While not required by law, DOD and VA chose to provide service members with these options as well.

The National Defense Authorization Act for Fiscal Year 2022 includes a provision for us to conduct a study on the implementation of the ILER program. This report describes available information on DOD and VA staff use of ILER and information about veterans' and service members' access to their ILER records.

Key Takeaways

- ILER data from October 2019 through January 2026 show that DOD and VA staff use of the ILER web application increased after the Honoring our PACT Act of 2022 (PACT Act) was enacted in August 2022. This act expanded eligibility for VA health care and disability benefits to veterans who had experienced certain toxic exposures during their military service. VBA claims benefits staff accounted for most of the increases and have consistently been the largest group of users since the PACT Act was enacted.
- In March 2026, ILER officials provided service members the ability to access and add self-reported updates to their record. ILER officials said they plan to provide service members with a way to request corrections by September 2026 and to provide veterans with access and a way to request corrections by October 2026.

What is ILER and what are its intended uses?

ILER is a web application that compiles and presents information from multiple DOD and VA data sources. It links available information on military service deployment histories and medical information with occupational and possible environmental exposures at specific dates, locations, and events. For example, the Defense Manpower Data Center provides data on military service dates, locations, assigned units, and occupations and the Defense Occupational and Environmental Health Readiness System—Industrial Hygiene includes occupational and environmental monitoring reports and health risk data.

According to ILER officials, as of April 2026, 16 DOD and VA databases and registries fed into ILER, totaling more than 155 million records. They said over 11.9 million service members and veterans have records that can be accessed through ILER. Most of the records capture data collected from 2001 to present, though some records capture data from decades earlier.¹

DOD and VA intended ILER to be a multi-purpose tool to support several uses:

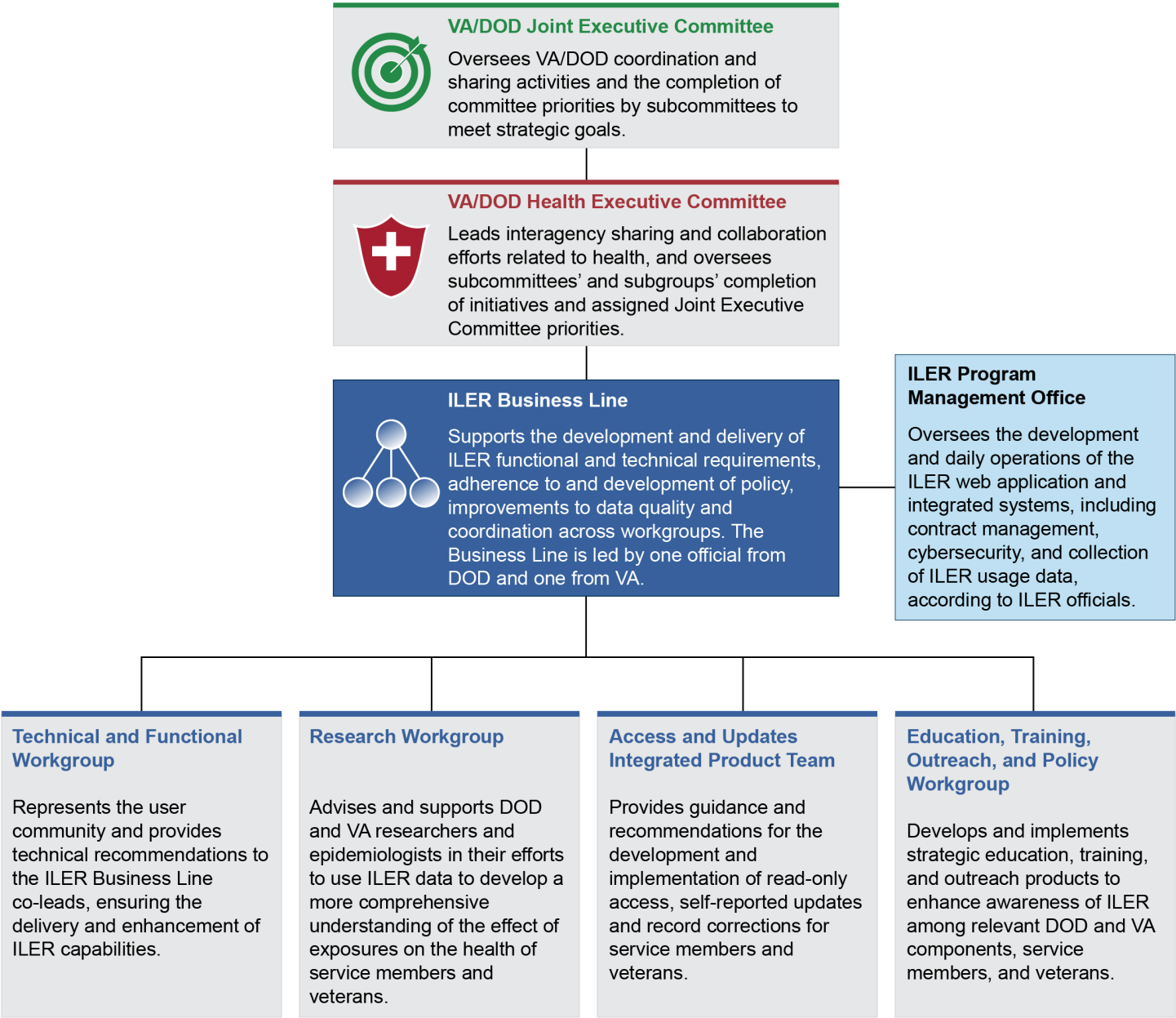
- **Adjudication for disability claims.** VBA staff adjudicating disability claims related to toxic exposures can use information in a veteran's ILER record to supplement other information contained in the veteran's submitted claim. This would include, for example, using the information to support a veteran's claim for service-connected benefits for a particular health condition.
- **Clinical care.** Clinicians, such as physicians providing health care to service members in DOD medical facilities and to veterans in VHA medical facilities, can use ILER. For example, clinicians can use information in a patient's ILER record to inform diagnoses and treatment decisions.
- **Research.** Federal and non-federal researchers conducting public health surveillance and epidemiological research can request and receive access to HIPAA-compliant data compiled by ILER to analyze trends and relationships between service-related exposures and post-deployment health outcomes.

To develop ILER and support its use, the ILER program has received over \$46 million total from fiscal years 2014 through 2025, according to DOD and VA funding data. Funding amounts for these fiscal years ranged from \$280,000 in fiscal year 2015 to over \$7 million in fiscal year 2021.² According to DOD and VA officials, funding comes from sources such as DOD departmental appropriations and the Joint Incentive Fund (which helps fund creative sharing initiatives between DOD and VA with the goal of improving the access to, and quality and cost effectiveness, of health care).

Who manages ILER?

The ILER Business Line, a subcommittee within the VA-DOD Health Executive Committee, is responsible for overseeing ILER activities. Established in 2024, the Business Line is to facilitate coordination between DOD and VA and their respective related ILER activities. The ILER Business Line includes workgroups that support ILER's user groups and a program management office responsible for developing and overseeing technical aspects of ILER (see fig. 1).

Figure 1: Department of Defense (DOD) and Department of Veterans Affairs (VA) Entities Involved with Managing the Individual Longitudinal Exposure Record (ILER) Program, as of 2024



Source: GAO analysis of DOD and VA information; GAO (icons). | GAO-26-108483

Accessible text for Figure 1: Department of Defense (DOD) and Department of Veterans Affairs (VA) Entities Involved with Managing the Individual Longitudinal Exposure Record (ILER) Program, as of 2024

VA/DOD Joint Executive Committee Oversees VA/DOD coordination and sharing activities and the completion of committee priorities by subcommittees to meet strategic goals.			
VA/DOD Health Executive Committee Leads interagency sharing and collaboration efforts related to health, and oversees subcommittees' and subgroups' completion of initiatives and assigned Joint Executive Committee priorities.			
ILER Business Line Supports the development and delivery of ILER functional and technical requirements, adherence to and development of policy, improvements to data quality and coordination across workgroups. The Business Line is led by one official from DOD and one from VA.		ILER Program Management Office Oversees the development and daily operations of the ILER web application and integrated systems, including contract management, cybersecurity, and collection of ILER usage data, according to ILER officials.	
Technical and Functional Workgroup	Research Workgroup	Access and Updates Integrated Product Team	Education, Training, Outreach, and Policy Workgroup
Represents the user community and provides technical recommendations to the ILER Business Line co-leads, ensuring the delivery and enhancement of ILER capabilities.	Advises and supports DOD and VA researchers and epidemiologists in their efforts to use ILER data to develop a more comprehensive understanding of the effect of exposures on the health of service members and veterans.	Provides guidance and recommendations for the development and implementation of read-only access, self-reported updates and record corrections for service members and veterans.	Develops and implements strategic education, training, and outreach products to enhance awareness of ILER among relevant DOD and VA components, service members, and veterans.

Source: GAO analysis of DOD and VA information; GAO (icons). | GAO-26-108483.

Note: Prior to March 2024, the Health Executive Committee did not have a subcommittee or subgroup dedicated solely to ILER. The Deployment Health Work Group, as part of the Health Executive Committee's research or clinical care subcommittees, had been reporting on ILER to the Health Executive Committee.

According to the ILER Business Line charter, each workgroup must develop one or more Plans of Action, Milestones, and Measures (referred to as plans of action) to support the ILER initiatives for which it is responsible. These plans of action are to be used by the ILER Business Line to track and report progress to the Health Executive Committee and Joint Executive Committee as needed. According to DOD and VA officials, service member and veteran access to ILER was a Health Executive Committee priority in fiscal year 2025. As of January 2026, fiscal year 2026 Health Executive Committee priorities had not been finalized.

How do DOD and VA staff and researchers access ILER information?

DOD and VA staff and researchers can access ILER, and the information it contains, in a variety of ways.

ILER web application. DOD and VA clinicians, researchers supporting health surveillance activities, and VBA claims benefits staff can create an ILER account and log into the web application to access and view ILER information and use any of ILER's other functionalities. For example, staff may search for specific individuals by name and date of birth to view all documented exposure information, deployment history, and health assessments.

Integrated systems. Clinicians and claims benefits staff can access read-only individual exposure summaries—summaries of service members' and veterans' ILER record that includes the individual's potential exposures, health assessments, and deployment history (e.g., locations, time frames)—through several databases that are integrated with ILER, as outlined in table 1.

Table 1: Integrated Systems That Provide Access to Individual Longitudinal Exposure Record (ILER) Toxic Exposure Summaries, as of April 2026

Integrated system	System purpose	Integration date ^a	Staff type and reason for use
Joint Longitudinal Viewer	Clinical application that provides read-only access to veterans' and service members' health data	July 2021	• Department of Defense (DOD) clinicians to provide health care services to service members with potential toxic exposures • Veterans Health Administration (VHA) clinicians to provide health care services to veterans with potential toxic exposures • Veterans Benefits Administration (VBA) claims benefits staff to adjudicate disability claims related to toxic exposures
Military Health System (MHS) GENESIS	DOD's electronic health record, containing health data for service members	November 2023	• DOD clinicians to provide health care services in DOD medical facilities to service members with potential toxic exposures • VHA clinicians to provide health care services in certain joint DOD-VA medical facilities
Veterans Benefits Management System	Web application for managing and processing veterans' disability claims	October 2024	• VBA claims benefits staff to adjudicate disability claims related to toxic exposures

Source: GAO analysis of DOD and Department of Veterans Affairs information. | GAO-26-108483

^aThe integration date is the date that ILER data was available through the integrated system.

Two of the systems, Military Health System (MHS) GENESIS and Veterans Benefits Management System (VBMS), have some automatic features related to providing data from ILER. For example, when a clinician opens a patient's health record through MHS GENESIS, an automatic alert appears if the patient's ILER record indicates there was a documented toxic exposure above a certain occupational exposure threshold. Additionally, when specific claims are established, veterans' ILER summaries are automatically added to their digital claims folder, which claims benefits staff can use to access stored documentation when processing the veterans' claims.

ILER Program Management Office. As of January 2026, researchers can request access to ILER data through the ILER Program Management Office. According to the ILER Business Line meeting minutes, in September 2025, the ILER Business Line co-leads approved research guidance to be published on DOD's website.³ The guidance includes information for government and non-government researchers, public health practitioners, and operational users on obtaining and using ILER data. Researchers interested in using ILER data for specific research projects (e.g., Institutional Review Board-approved epidemiological research studies, public health surveillance) can submit a request to the ILER Program Management Office to determine if ILER can support their research. If approved, the researchers must take additional steps, such as visiting an ILER test site to determine whether data are available to answer the study question and obtaining a data transfer or access to the ILER web application.

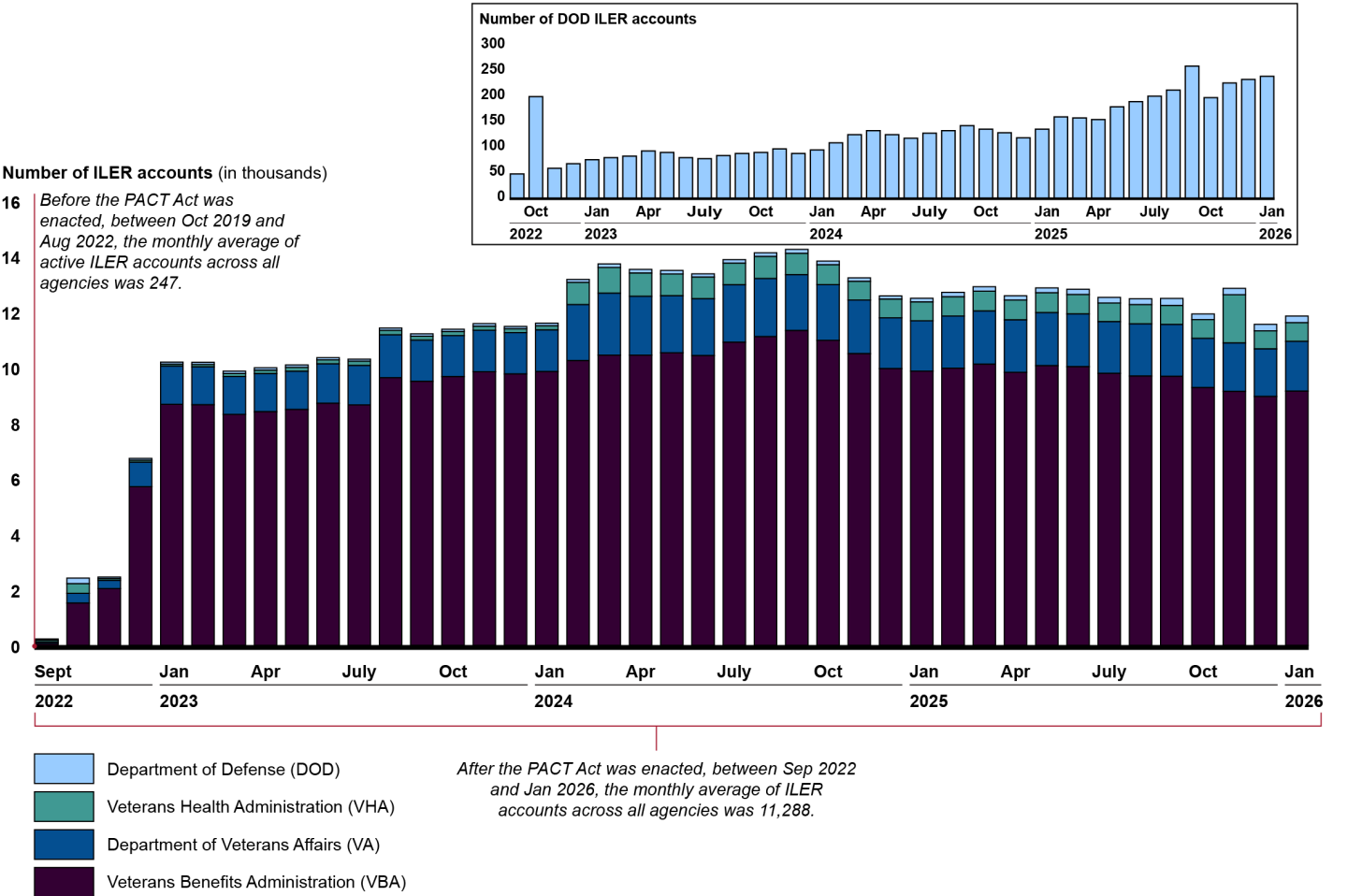
What do available data indicate about ILER use?

Available data show staff use of ILER data initially increased after the PACT Act was enacted in August 2022 and VBA claims benefits staff consistently drove ILER use. The PACT Act expanded eligibility for VA health care and disability benefits to veterans who had experienced certain toxic exposures during their military service.⁴ In November 2024, after ILER's integration with VBMS, VBA staff use of the ILER web application decreased and has remained steady.

ILER web application. According to our review of web application account and login data from October 2019 through January 2026, ILER usage initially increased after the PACT Act was enacted. In January 2023, VBA required claims benefits staff to use ILER when processing certain toxic exposure related claims. Since 2023, VBA staff have consistently had the largest share of active

accounts and logins (see figs. 2 and 3). Since February 2024 (when VHA active accounts increased), most VHA staff with active accounts were enrollment staff. These staff are required to use ILER when determining if veterans are eligible to enroll in VA health care. Since ILER’s launch in 2019, DOD staff with the most active accounts were clinicians.

Figure 2: Individual Longitudinal Exposure Record (ILER) Active Accounts, by Agency, After the PACT Act (September 2022 through January 2026)



Source: GAO analysis of DOD data. | GAO-26-108483

Accessible data for Figure 2: Individual Longitudinal Exposure Record (ILER) Active Accounts, by Agency, After the PACT Act (September 2022 through January 2026)

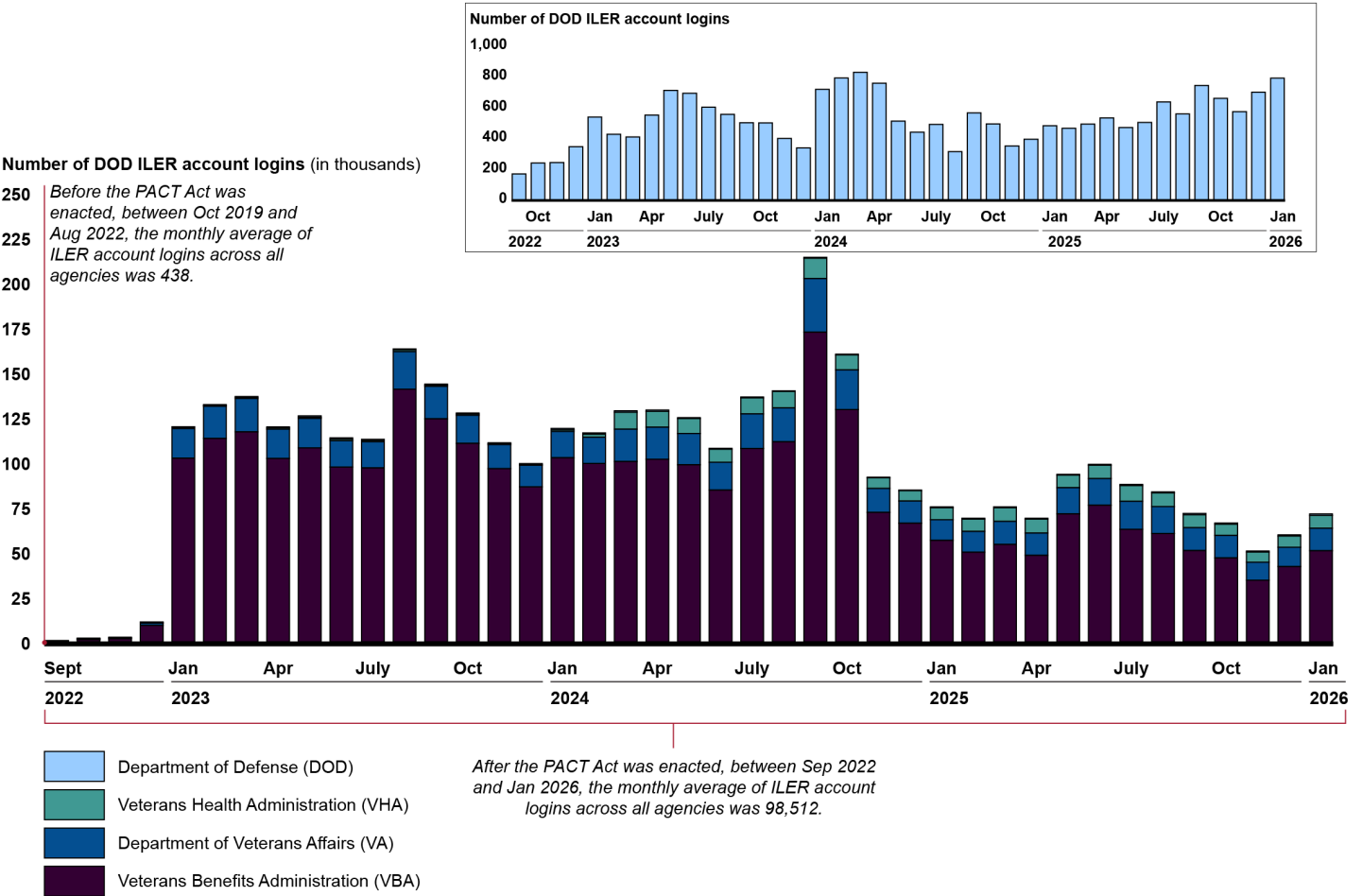
Year	Date	VBA	VA	VHA	DOD
2022		61	56	64	48
	Oct	1520	349	349	200
		2039	293	65	59
		5712	881	66	68
2023	Jan	8675	1377	69	76
		8660	1366	82	80
		8315	1361	111	83
	Apr	8410	1371	119	93
		8490	1377	137	90
		8714	1417	146	80
	July	8653	1419	154	78
		9638	1537	162	84
		9505	1481	142	88
	Oct	9671	1478	143	90
		9851	1491	142	97

		9769	1489	136	88
2024	Jan	9852	1501	149	95
		10248	2015	800	109
		10445	2232	928	125
	Apr	10444	2121	838	133
		10530	2055	786	125
		10432	2047	778	118
	July	10911	2070	779	128
		11113	2091	797	133
		11333	2009	768	143
	Oct	10978	2005	716	136
		10502	1930	669	129
		9963	1825	672	119
2025	Jan	9873	1810	676	136
		9977	1875	695	160
		10119	1919	712	158
	Apr	9830	1886	714	155
		10069	1910	711	180
		10032	1895	703	190
	July	9788	1863	674	201
		9692	1878	694	213
		9682	1870	679	260
	Oct	9276	1775	678	198
		9139	1743	1743	227
		8961	1710	650	234
2026	Jan	9149	1794	670	240

Source: GAO analysis of DOD data. | GAO-26-108483.

Note: The figure shows the monthly number of staff from the Department of Defense (DOD), Department of Veterans Affairs (VA), Veterans Health Administration (VHA), and Veterans Benefits Administration (VBA) who logged into their ILER accounts at least once in the last 35 days, from September 2022—the first full month after the Honoring our PACT Act of 2022 (PACT Act) was enacted—through January 2026. Staff represented in the VA group selected VA as their agency when setting up their ILER account without specifying if they work for VBA or VHA. However, available data shows that since October 2022, the majority of staff with active accounts within VA were claims benefits staff. The PACT Act was enacted in mid-August 2022 and states that VBA may consider exposure tracking systems, such as ILER, in processing disability claims for veterans. In January 2023, VBA issued a standard operating procedure requiring VBA staff to use ILER for processing certain toxic exposure related disability claims.

Figure 3: Individual Longitudinal Exposure Record (ILER) Account Logins, by Agency, After the PACT Act (September 2022 through January 2026)



Source: GAO analysis of DOD data. | GAO-26-108483

Accessible data for Figure 3: Individual Longitudinal Exposure Record (ILER) Account Logins, by Agency, After the PACT Act (September 2022 through January 2026)

Year	Date	VBA	VA	VHA	DOD
2022		73	203	229	172
	Oct	1149	318	235	243
		1606	397	245	246
		9034	1304	281	349
2023	Jan	102130	16501	444	541
		113155	17895	505	429
		116789	18606	684	412
	Apr	102015	16288	728	554
		107881	16397	740	714
		97187	14743	820	695
	July	96702	14611	763	605
		140529	20956	963	558
		124038	18128	754	504
	Oct	110381	15709	700	503
		96286	13414	627	402
		86218	11994	622	341
2024	Jan	102433	14652	883	721
		99256	14574	1613	795
		100284	18010	9461	832
	Apr	101598	17791	8843	761

		98441	17412	8340	515
		84387	15515	7276	443
	July	107575	19242	8902	493
		111301	18847	9151	316
		172280	29844	11324	568
	Oct	129221	22057	8327	496
		71945	13373	5902	353
		65936	12334	5757	397
2025	Jan	56372	11495	6675	485
		49802	11588	6849	468
		54142	12863	7571	495
	Apr	48050	12421	7728	535
		71119	14636	6935	473
		76000	14822	7422	506
	July	62563	15559	8801	639
		60224	14976	7601	561
		50766	12728	7155	746
	Oct	46623	12516	6272	662
		34238	9964	5724	576
		41837	10735	6232	702
2026	Jan	50633	12524	7159	794

Source: GAO analysis of DOD data. | GAO-26-108483.

Note: The figure shows the monthly number of times staff from the Department of Defense (DOD), Department of Veterans Affairs (VA), Veterans Health Administration (VHA), and Veterans Benefits Administration (VBA) logged into their ILER accounts from September 2022—the first full month after the Honoring our PACT Act of 2022 (PACT Act) was enacted—through January 2026. Staff represented in the VA group selected VA as their agency when setting up their ILER account without specifying if they work for VBA or VHA. However, available data shows that, since January 2023, the majority of logins for the VA group were claims benefits staff. The PACT Act was enacted in mid-August 2022 and states that VBA may consider exposure tracking systems, such as ILER, in processing disability claims for veterans. In January 2023, VBA issued a standard operating procedure requiring VBA staff to use ILER for processing certain toxic exposure related disability claims.

Integrated systems. On average, DOD and VA staff downloaded ILER data through the Joint Longitudinal Viewer (JLV) more often than through DOD’s MHS GENESIS. We found that the average monthly downloads of ILER individual exposure summaries through JLV (20,476) was higher than the average for MHS GENESIS (1,003) from November 2023 (when ILER was integrated with MHS GENESIS) through January 2026. This suggests VA and DOD clinicians and VBA claims benefits staff are using information from the individual exposure summaries through JLV more than DOD clinicians are using it through MHS GENESIS. Similar data for VBMS are not available because a veteran’s individual exposure summary is automatically made available to VBA staff when they establish a specific claim. See appendix I for more information.

Research. As of January 2026, researchers had used ILER data for nine research projects, according to ILER Business Line officials. These officials said the research projects included two Institutional Review Board-approved studies and seven population health surveillance studies. For example, the National Academies of Sciences, Engineering, and Medicine used ILER data for their Institutional Review Board-approved study on military exposures and mental, behavioral, and neurological health outcomes among post-911 veterans, published in 2025. In addition, an example of a health surveillance study using ILER data included a DOD military aviator cancer study, according to ILER Business Line officials.

How do DOD and VA monitor information on ILER use?

DOD and VA have taken steps toward monitoring ILER use in response to recommendations we made in a related report we issued in 2024.⁵ Our recommendations, with which DOD and VA concurred, directed each department to establish goals with performance measures on the extent of ILER use by types

of staff and purpose. We also recommended they use the data collected for the goals' performance measures to inform management decisions. By implementing these recommendations, the agencies will be better positioned to determine if actions—such as additional outreach to staff—are needed to increase awareness about ILER and ensure it is fully used for all of its intended purposes.

As of February 2026, DOD and VA officials reported that the agencies had internally approved certain goals and performance measures related to ILER use by staff and purpose. For example:

- DOD developed goals and measures related to increasing ILER use among DOD staff (who are primarily clinicians). For example, one goal is to increase the number of new DOD ILER web application accounts by an average of 25 per month for calendar year 2026.
- VHA developed goals and measures related to the number of VA medical facilities having ILER accounts activated by at least one enrollment and eligibility and one environmental health staff member.
- VBA developed goals and measures related to ensuring that claims processing staff use available ILER data when processing at least 80 percent of toxic exposure risk activity-related disability claims.

However, steps remain in order to fully implement our recommendations. These include establishing benchmarks and using performance data to inform management decisions as well as providing additional information about how they plan to measure ILER use by staff type (including researchers).

To what extent can service members access and modify their ILER records?

As of March 2026, service members can access the ILER web application to view a read-only copy of their ILER record and add self-reported updates.⁶

- **Access.** To access their ILER record (including their individual exposure summary) through their web application account, service members can authenticate their identities using valid DOD Common Access Cards.⁷ Once a service member's identity is confirmed, the service member can access only their individual exposure summary, which is tied to the personal identifier embedded in their Common Access Card. They can also download and print their summary.
- **Self-Reported Updates.** To report any instances where their ILER records may need to be updated, service members can click a button on the home screen called "Add To My ILER" and they can add information. Such information can include garrison and deployment locations, registries, and possible incidents and exposures to their ILER record. Service members can add information using either free text or a drop-down list. The information is flagged in the web application as a self-reported update and viewable as such to the service member and staff using ILER. See appendix II for examples of how the self-reported update capability is displayed in ILER.

Service members do not yet have a way to request corrections for information in their record. ILER Business Line officials said they are aiming to provide this capability by September 2026. ILER Business Line officials said the ILER Program Management Office is not staffed to receive correction requests and validate them, and they will have to rely on the owner of each data system that feeds into ILER to make the corrections. As such, they are working with the data system owners such as departments in DOD and VA to determine the best approach for how service members can correct information.

To what extent can veterans access and modify their ILER records?

As of May 2026, ILER Business Line officials told us veterans were not yet able to access their ILER records, add self-reported updates to them, or request corrections. The officials said they were planning to provide veterans with these capabilities by October 2026. However, in June 2026, ILER Business Line officials from VA indicated that they had modified this approach, stating that veterans will be given the ability to request corrections to their ILER records but would not be able to add self-reported updates on their own.

ILER Business Line officials have determined how veterans will access their ILER information. Specifically, veterans will be able to access their individual exposure summary through VA's main website by signing in through a secure platform such as Login.gov. In June 2026, ILER Program Management Office officials stated that they were planning to also give veterans access to ILER through the web application.

Remaining steps for providing veterans with the ability to access and submit requests for corrections include adding the ability for veterans to view and download their individual exposure summary information through VA's main website and conducting beta testing with veterans and incorporating their feedback. In addition, officials said they need to determine the best approach to allow veterans to submit corrections to information in ILER.

To what extent have DOD and VA provided education, training, and outreach to service members and veterans on using ILER?

In March 2026, the ILER Business Line began providing some education and training materials for service members. For example, officials created and posted fact sheets, FAQs, and a personal ILER access training video for service members on DOD's webpage for ILER.⁸ According to ILER Business Line officials, they also plan to communicate information about ILER resources on service members' paycheck/leave and earnings statements, as well as social media posts.

ILER Business Line officials said they have not specifically focused any education, training and outreach efforts on veterans yet. They said they plan to launch an awareness and outreach campaign for service members and veterans after veterans have access to ILER. The awareness and outreach campaign plan was developed by the Education, Training, Outreach and Policy workgroup and approved by ILER Business Line leadership officials in March 2026. It includes coordinating with Veteran Service Organizations, Military Service Organizations, and relevant DOD and VA clinical staff. The purpose of the campaign is to raise awareness of ILER for service members and veterans, promote adoption of ILER by clinicians, and support policy conversations with congressional staff, according to the awareness campaign plan outline.

What are potential benefits service members and veterans may experience as a result of using their ILER records?

Officials from the ILER Business Line and eight stakeholder groups we interviewed noted potential benefits of providing service members and veterans with the ability to use ILER including the following:

- **Increased transparency.** Service members and veterans may gain greater insight into the information—such as service-related information and health assessments—that clinicians and VBA claim benefits staff use when making health care treatment decisions and disability claims decisions, respectively. According to officials from the ILER Business Line and one of the stakeholder groups, this may increase service members' and veterans' trust of DOD and VA.
- **Increased knowledge.** Service members and veterans could gain increased knowledge about possible health effects from toxic exposures and be better positioned to take control of their health. For example, they may be able to

have more informed conversations with clinicians about diagnosed conditions and the risk of future health effects. Officials from two of the stakeholder groups we spoke with also said ILER could help service members and veterans inform their families of possible toxic exposures. For example, a family member may have experienced the same exposure when stationed with the service member or veteran.

- **Increased data accuracy.** Allowing service members and veterans the opportunity to update information, such as missing or incorrect information in their ILER record, could help provide a more complete picture of their overall exposures. According to officials from the ILER Business Line and three stakeholder groups such information could also better inform disability claims submissions or adjudication and allow for more effective medical treatment.

What are potential challenges service members and veterans may experience as a result of using their ILER records?

Officials from the ILER Business Line and eight stakeholder groups noted potential challenges that service members and veterans may experience as a result of accessing, self-updating, and correcting their ILER record and ways to help mitigate them, including the following:

- **Frustration if there are missing or incomplete records.** Service members and veterans may have missing records or incomplete information about their service and deployment history and toxic exposures that they would expect to see in their ILER records. For example, information related to classified missions is not currently included in ILER records. Therefore, a service member or veteran may be frustrated that information is missing, especially since they do not have access to it or the ability to update it to inform clinical decisions and support disability claims. In addition, veterans who were deployed prior to 2001 and have multiple exposures from their deployments may be missing ILER records because many of the underlying databases do not capture older data. Such gaps could cause frustration for these veterans, particularly if submitting self-reported updates to the record and correcting them are not made easy.

To help mitigate this challenge, three stakeholder groups we interviewed stressed the importance of DOD and VA being transparent about what is included in ILER and any limitations with the information it contains and its capabilities. ILER Business Line officials agreed and said they have efforts in place to disseminate information (such as through DOD's ILER webpage) on ILER's capabilities, benefits, and limitations. According to ILER Business Line officials, as of May 2026, there are no plans in place to include classified information into ILER. However, DOD is expected to increase transparency related to classified information currently missing in ILER records. The National Defense Authorization Act for Fiscal Year 2026 requires DOD to provide an annual briefing to the Senate and House Armed Services Committees and the Senate and House Veterans' Affairs Committees with an explanation of how they intend to include ILER data that is partially or fully classified.⁹ According to ILER Business Line officials, as of May 2026, DOD has not set a date to provide the annual briefing.

- **Confusion and uncertainty related to technical information.** Officials from the ILER Business Line and four stakeholder groups said that information in ILER can be technical, and service members and veterans may not be able to understand some of it, which could create confusion or uncertainty about their potential exposures. For example, certain exposure risk estimates or medical terms may be hard to understand.

ILER Business Line officials said to help mitigate this challenge, they have included pop-up windows within the ILER web application with information to

explain where the data come from and what they mean. See appendix II for an example of the pop-up window. Additionally, ILER Business Line officials said they conducted beta testing with service members and incorporated feedback when developing the access and update capabilities and plan to do the same with veterans.

- **Concerns about shifting burden of proof.** Officials from three stakeholder groups we interviewed expressed concern that the burden of proof for disability claims could shift to veterans, and veterans may feel like they must fix incomplete records in order to have a claim approved.

To help mitigate this, VA policy states that claims adjudicators are expected to use ILER for certain claims only in addition to other sources. That is, ILER should not be used by claims adjudicators to deny a claim—meaning they should not determine that there is no qualifying disability simply because an ILER record does not support a toxic exposure-associated disability or a record is missing.

Agency Comments

We provided a draft of this report to DOD and VA for review and comment. DOD and VA provided technical comments, which we incorporated as appropriate.

How GAO Did This Study

To obtain information about ILER including the data sources that feed into it and the number of records contained therein, its intended uses, and its oversight structure, we reviewed ILER Business Line documentation and interviewed ILER Business Line officials.

To describe what available DOD data show about ILER's use among DOD and VA staff, we obtained and analyzed data from the ILER Business Line. Specifically, we analyzed data maintained by the ILER Program Management Office to determine the total number and types of active ILER accounts for DOD and VA staff for each month from October 2019 (when ILER was first available for staff use) through January 2026, the most recent data available at the time of our review. We analyzed data on the total number of ILER account logins during this time to determine the number and type of staff accessing information through the web application. We also analyzed data on individual exposure summary downloads requested through MHS GENESIS and JLV.

To assess the reliability of these data, we obtained information from knowledgeable ILER Business Line officials regarding the accuracy of the data and how the data have been used, and we performed checks to identify missing or incorrect data. Based on these steps, we determined that the data were sufficiently reliable for our reporting purposes.

To describe how DOD and VA plan to monitor ILER usage and the steps the ILER Business Line has taken to provide veterans and service members with the ability to access, add self-reported updates, and correct their records, we reviewed ILER Business Line documentation and interviewed officials.

To describe the potential benefits and challenges service members and veterans may experience as a result of accessing, updating, and correcting their ILER records, we interviewed officials from the ILER Business Line, six military and veterans service organizations, and two toxic exposure non-profit organizations.¹⁰ We selected these organizations because they are national organizations that represent service members or veterans and have knowledge or expertise related to military toxic exposures. The views of these organizations are not generalizable.

We conducted this performance audit from April 2025 to July 2026 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives.

List of Addressees

The Honorable Roger Wicker
Chairman
The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Jerry Moran
Chairman
The Honorable Richard Blumenthal
Ranking Member
Committee on Veterans' Affairs
United States Senate

The Honorable Mike Rogers
Chairman
The Honorable Adam Smith
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Mike Bost
Chairman
The Honorable Mark Takano
Ranking Member
Committee on Veterans' Affairs
House of Representatives

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Staff Acknowledgments: Hernan Bozzolo (Assistant Director), Kaitlin Dunn (Analyst in Charge), Sam Amrhein, Ángela González Yanes, Michelle Kimmet, Monica Perez-Nelson, and Roxanna Sun made key contributions to this report.

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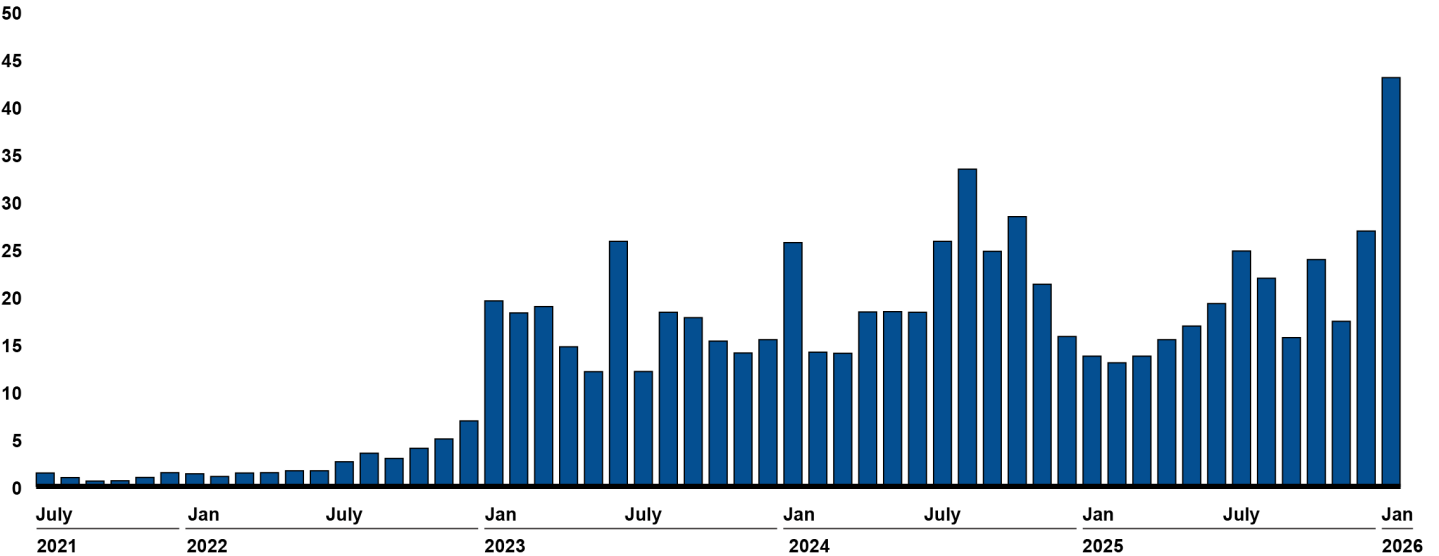
Appendix I: Additional Information on Staff Use of ILER Through the Integrated Systems

This appendix provides additional information on staff use of Individual Longitudinal Exposure Record (ILER) data through the integrated systems including the Joint Longitudinal Viewer (JLV), Military Health System (MHS) GENESIS, and the Veterans Benefits Management System (VBMS). DOD and VA staff use these integrated systems. DOD and VA staff use of ILER through

JLV increased after the Honoring our PACT Act of 2022 (PACT Act) was enacted in August 2022. DOD staff use of MHS GENESIS has remained relatively stable since its integration, with some increases. Similar data for VBMS are not available because a veteran's individual exposure summary is automatically made available to VBA staff when they establish a specific claim.

JLV. Available usage data indicates that the number of times DOD and VA staff requested to download an ILER individual exposure summary through JLV increased after the PACT Act was enacted in August 2022. The average monthly number of downloads through JLV increased from 1,448 before the PACT Act (from July 2021) to 18,152 from September 2022 through January 2026 (see fig. 4). Additionally, on average each month after the PACT Act was enacted through January 2026, DOD and VA staff requested to download the individual exposure summary about 20 percent of the time they accessed a read-only electronic health record through JLV when a service member's or veteran's ILER record was available.

Figure 4: Number of Downloads of Individual Longitudinal Exposure Record (ILER) Summaries Through the Joint Longitudinal Viewer (JLV), July 2021 Through January 2026
Number of JLV downloads (in thousands)



Source: GAO analysis of DOD data. | GAO-26-108483

Accessible data for Figure 4: Number of Downloads of Individual Longitudinal Exposure Record (ILER) Summaries Through the Joint Longitudinal Viewer (JLV), July 2021 Through January 2026

Year	Month	Number of JLV requested downloads
2021	July	1395
		911
		541
		577
		929
		1435
2022	Jan	1319
		1031
		1399
		1421
		1622
		1626
	July	2582
		3483
		2934
		3998
		4983

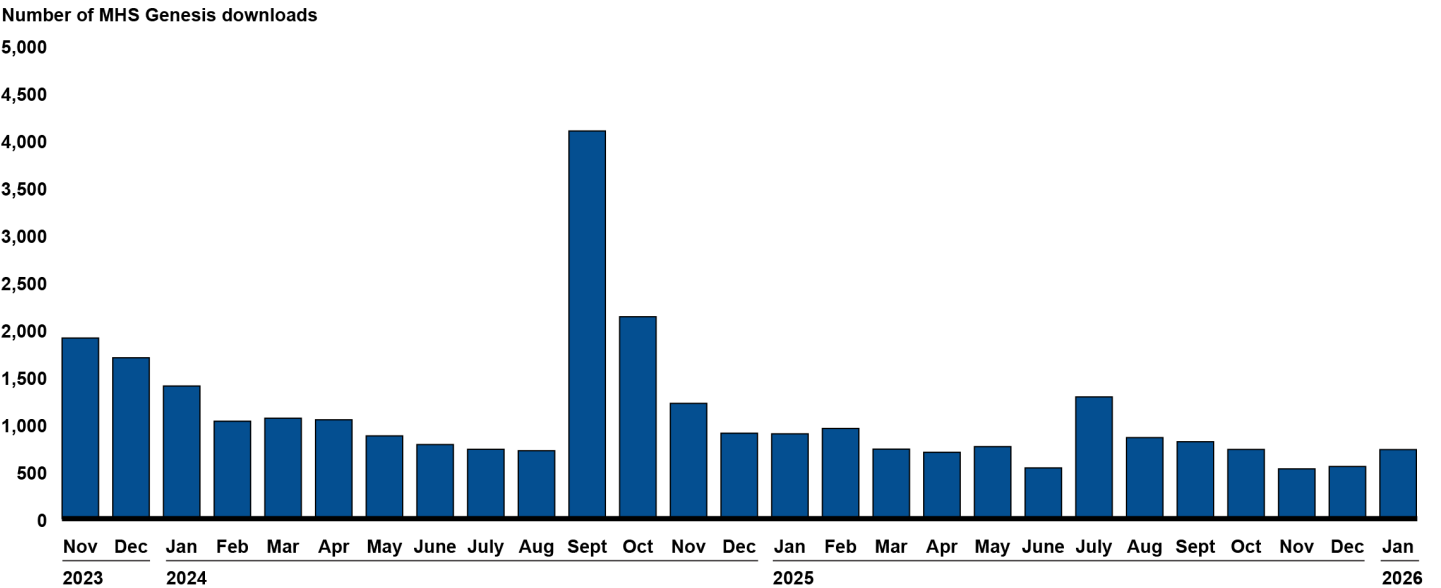
		6879
2023	Jan	19515
		18244
		18910
		14682
		12054
		25771
	July	12076
		18316
		17749
		15271
		14028
		15429
2024	Jan	25644
		14115
		13992
		18345
		18379
		18306
	July	25772
		33381
		24721
		28383
		21268
		15759
2025	Jan	13689
		12998
		13702
		15428
		16864
		19236
	July	24769
		21897
		15637
		23855
		17362
		26867
2026	Jan	43019

Source: GAO analysis of DOD data. | GAO-26-108483.

Note: The figure shows the number of times staff from the Department of Defense (DOD) and Department of Veterans Affairs (VA), including the Veterans Health Administration (VHA) and Veterans Benefits Administration (VBA), requested to download individual exposure summaries from the ILER using JLV, per month, from July 2021 (when JLV was integrated with ILER) through January 2026. JLV is a DOD and VA system that provides staff (e.g., DOD and VHA clinicians) with read-only access to electronic health record data.

Military Health System (MHS) GENESIS. Available data indicates that the average monthly downloads of ILER individual exposure summaries by DOD staff using MHS GENESIS since its integration with ILER (in November 2023) through January 2026 was 1,003 (see fig. 5). Additionally, on average each month, DOD staff requested to download the individual exposure summary about 0.2 percent of the time they accessed an electronic health record through MHS GENESIS when a service member's ILER record was available. This was lower than the equivalent percentage of 20 percent for JLV, suggesting DOD staff used information in an individual exposure summary from MHS GENESIS to a lesser extent than VA and DOD staff used such information through JLV. While only DOD clinicians and some VA clinicians can use MHS GENESIS, VA and DOD clinicians as well as VBA claims benefits staff can use JLV. This may have contributed to some of the differences in use between MHS GENESIS and JLV.

Figure 5: Number of Downloads of Individual Longitudinal Exposure Record (ILER) Summaries Through MHS GENESIS, November 2023 Through January 2026



Source: GAO analysis of DOD data. | GAO-26-108483

Accessible data for Figure 5: Number of Downloads of Individual Longitudinal Exposure Record (ILER) Summaries Through MHS GENESIS, November 2023 Through January 2026

Year	Data	Number of MHS GENESIS requested downloads
2023	Nov	1906
	Dec	1698
2024	Jan	1400
	Feb	1028
	Mar	1060
	Apr	1043
	May	873
	June	781
	July	732
	Aug	716
	Sept	4093
	Oct	2131
	Nov	1217
	Dec	901
2025	Jan	895
	Feb	951
	Mar	733
	Apr	699
	May	759
	June	535
	July	666
	Aug	456
	Sept	433
	Oct	399
	Nov	287
	Dec	299
2026	Jan	386

Source: GAO analysis of DOD data. | GAO-26-108483.

Note: The figure shows the number of times staff from the Department of Defense (DOD) and Veterans Health Administration (VHA) staff in certain joint DOD-VA medical facilities requested to download individual exposure summaries from ILER using Military Health System (MHS) GENESIS, per month, from November 2023 (when it was integrated with ILER) through January 2026. MHS GENESIS is DOD’s electronic health record system.

VBMS. Unlike JLV and MHS GENESIS, there are no data on VBA staff downloads of veterans' individual exposure summaries through VBMS, according to ILER Business Line officials. This is because an individual exposure summary automatically uploads to VBMS when specific claims are established by staff. Additionally, VBA staff may request the veteran's ILER summary to be downloaded into the veteran's digital claims folder. Our review of related data from October 2024 through January 2026 showed that these uploads of veterans' summaries to VBMS occurred an average of 110,085 times per month. ILER Business Line officials noted that these data reflect the availability of veterans' ILER records through VBMS but not necessarily whether VBA staff accessed such records for claims processing.

**Appendix II:
Information Display of
the Self-Reported
Update Function and
the Pop-up Help
Windows in the
Individual Longitudinal
Exposure Record
(ILER)**

This appendix provides examples of how the self-reported update capability, and the pop-up “Help” windows are displayed in ILER. Through the ILER web application, service members can access their personal ILER record and add self-reported updates by clicking the “Add to My ILER” button on the landing page. Once they do that, staff can choose to add information by clicking “Yes” or “No” to various questions (see fig. 6). From there, they can add missing information using either free text or a drop-down list (see fig. 7). If, when accessing their ILER record, a service member needs more detailed information about what each section means, they can click on the “Help” icon. The resulting pop-ups contain detailed information to assist service members in navigating and understanding the data presented (see fig. 8). According to ILER Business Line officials, pop-ups are included for several sections within a personal ILER account including Personnel History, Deployment History, Registries, Potential Hazards, and Incidents.

Figure 6: Individual Longitudinal Exposure Record (ILER) Web Application “Add to My ILER” Function for Service Members

The screenshot displays the 'Individual Exposure Summary Information' page of the ILER web application. A pop-up window titled 'Add to My ILER' is open, containing a warning message: 'Data submitted is visible to DoD/VA authorized officials. Sensitive or inappropriate information may not be included in your ILER summary.' Below the warning, there are four questions with 'Yes' and 'No' radio button options:

- > Were you stationed at a location (non-deployment) that is not listed in your ILER? ☐ Yes ☒ No
- > Were you deployed to a location that is not listed in ILER? ☐ Yes ☒ No
- > Are you registered/participating in a Registry that is not listed in ILER? ☐ Yes ☒ No
- > Do you believe you experienced any toxic exposures that are not listed in your ILER? ☐ Yes ☒ No

At the bottom of the pop-up are 'Submit' and 'Clear' buttons. In the background, the main page shows a header with the title 'Individual Exposure Summary Information', a user identifier 'Individual Exposure Summary Information: User, Personal (1000007702)', and an 'Add to My ILER' button. A sidebar on the right contains a 'Service MOS description' section with a red document icon and a blue square icon.

Source: Department of Defense ILER Release Management Documentation (supports version 2.4.9.0 Personal ILER Access). | GAO-26-108483

Figure 7: Example of Information Service Members Can Add to Their Individual Longitudinal Exposure Record (ILER) Record

Add to My ILER

Data submitted is visible to DoD/VA authorized officials. Sensitive or inappropriate information may not be included in your ILER summary.

> Were you stationed at a location (non-deployment) that is not listed in your ILER?

☐ Yes ☒ No

> Were you deployed to a location that is not listed in ILER?

☐ Yes ☒ No

> Are you registered/participating in a Registry that is not listed in ILER?

☐ Yes ☒ No

▴ Do you believe you experienced any toxic exposures that are not listed in your ILER?

☒ Yes ☐ No

Date of Incident/Exposure (MM/DD/YYYY) *

MM/DD/YYYY

Description of Toxic Exposure *

Country *

--- SELECT ---

Location Name *

Start typing...

Submit

Clear

Source: Department of Defense ILER Release Management Documentation (supports version 2.4.9.0 Personal ILER Access). | GAO-26-108483

Figure 8: Example of the Help Pop-up Window for the Personnel History Section in a Service Member's Individual Longitudinal Exposure Record (ILER) Record

Individual Exposure Summary Information

Individual Exposure Summary Information: Farmer, Nikole (1377263894)

Add to My ILER

Report Last Modified : 03/24/2026

▴ Personnel History [Count: 5]

Assigned UIC

UIC Name

11

--- ALL ---

12/22/2008

08/09/2012

Office of the Secretary of Defense

DoD and Uniformed Service contract employee

Report Last Modified:

* Audit data may not be available prior to October 1 2024

Help

Personnel History Help (Personal ILER)

ILER provides Personnel History information from the DMDC DEERS source system. This data includes the latest duty station location where an employee (contractor or civilian) or service member works. An employee's duty station is documented on their most recent notification of personnel action, such as a Standard Form 50. A military member's duty station is the base or installation where they live and work. This may be a long-term assignment to a permanent duty station (PDS) or permanent change of station (PCS). Assigned unit (UIC) information and military occupation specialty (MOS) is also listed, if received from DMDC. Note that military, contractor, and civilian assignments are included for a full picture of DoD service.

Occupations which contain a link with additional data may be associated with a higher incidence of exposures or medical conditions. These occupations are contained in the DoD Manual: 6055.05 (July 2022) Occupational Medical Examinations: Medical Surveillance and Medical Qualification, "Table 1: Examples of Medical Conditions Associated with Workplace Overexposure".

Corrections to military service information may be requested via the DD149 Correction of Military Record Form.

DoD Occupation Title

MOS Code

DoD Occ Code

DoD Occ Title

11

11

11

d Service contract employee

d Service contract employee

d Service contract employee

d Service contract employee

Source: ILER Business Line officials. | GAO-26-108483

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Endnotes

¹According to ILER officials, the following databases and registries include data prior to 2001: DOD Defense Occupational and Environmental Health Readiness System – Hearing Conservation; Chemical Biological Warfare Exposure System, which is housed in the DOD Defense Occupational and Environmental Health Readiness System – Industrial Hygiene database; DOD Gulf War Oil Well Fire and Smoke Registry; DOD Khamisiyah Registry; VA Agent Orange Registry; VA Airborne Hazards and Open Burn Pits Registry; VA Gulf War Registry; and VA Ionizing Radiation Registry.

Other databases and registries that feed into ILER (as of April 2026) include: DOD Defense Manpower Data Center; DOD Military Health System Data Repository; DOD Defense Medical Surveillance System; DOD Defense Occupational and Environmental Health Readiness System - Industrial Hygiene; Chemical Warfare Agents Operation Iraqi Freedom and Operation New Dawn Registry; DOD Depleted Uranium Registry; DOD Oahu Military Water Contamination (Red Hill) Registry; and DOD Operation Tomodachi Registry.

²According to ILER officials, average yearly funding for ILER from 2014 to 2025 was \$3.86 million. According to DOD officials, ILER's increase in funding to \$7.28 million in fiscal year 2021 was due to a direction from the VA/DOD Joint Executive Committee (the entity that oversees ILER) to expand the scope of ILER and develop new capabilities.

³See "Individual Longitudinal Exposure Record Data Request Guidelines: Version 1.0, July 31, 2025," Defense Health Agency, last updated December 12, 2025, <https://www.health.mil/Military-Health-Topics/Environmental-Exposures-Hub/Environmental-Exposures-Topics/ILER/ILER-Research-Guidelines>.

⁴Pub. L. No. 117-168, 136 Stat. 1759.

⁵GAO, *Military Health Care: DOD and VA Could Benefit from More Information on Staff Use of Military Toxic Exposure Records*, [GAO-24-106423](#) (Washington, D.C.: May 23, 2024).

⁶According to ILER Business Line officials, veterans who are DOD civilian and contractor staff are also able to access ILER.

⁷According to ILER Business Line officials, ILER has been authorized for use under the Defense Health Agency Risk Management Framework and aligns with National Institute of Standards and Technology security and privacy controls. This suggests it has undergone formal cybersecurity review and approval processes for handling sensitive data and providing user access. ILER is using the Defense Health Agency Identity Authentication Services to confirm service members' identity prior to providing access to ILER. The Identity Authentication Services is a Single Sign On solution that requires a valid DOD Common Access Card.

⁸"ILER: Exposure Data Management for Service Member and Veteran Care," Defense Health Agency, last updated April 7, 2026, <https://www.health.mil/Military-Health-Topics/Environmental-Exposures-Hub/Environmental-Exposures-Topics/ILER>.

⁹Pub. L. No. 119-60, § 521, 139 Stat. 718, 863 (2025).

¹⁰We interviewed representatives from six military and veteran service organizations: the Military Officers Association of America, Reserve Organization of America, Burn Pits 360; the Disabled American Veterans; the Iraq and Afghanistan Veterans of America; and Tragedy Assistance Program for Survivors, and two toxic exposure related non-profits, the Invisible Enemy and the Stronghold Freedom Foundation.