

GAO Highlights

Highlights of [GAO-19-272T](#), testimony before the Committee on Veterans' Affairs, House of Representatives

Why GAO Did This Study

VA's disability compensation program pays cash benefits to veterans with disabilities connected to their military service. In recent years, veterans who appealed VA decisions on their claims have waited an average of 3 years. The subset of appeals resolved by the Board of Veterans Appeals—a separate VA agency that provides a higher level of appeals review—took on average 7 years to resolve.

The Veterans Appeals Improvement and Modernization Act of 2017 makes changes to VA's current (legacy) process, giving veterans options to have their claims reviewed by VA or to appeal directly to the Board. The Act requires VA to submit to Congress and GAO a plan for implementing a new appeals process (which VA submitted in November 2017) and periodic progress reports (which VA submitted in February, May, August, and November 2018). The Act also includes a provision for GAO to assess VA's original plan.

In March 2018, GAO found that VA could help ensure successful implementation of appeals reform by addressing gaps in planning and made four recommendations, with which VA agreed. This testimony focuses on the steps VA has taken to address GAO's recommendations, what aspects remain unaddressed, and risks these gaps pose for implementation.

For this statement, GAO reviewed VA's updated plans, assessed VA's schedules against best practices, interviewed VA officials and reviewed information they provided about steps taken to implement GAO's recommendations.

View [GAO-19-272T](#). For more information, contact Elizabeth Curda at (202) 512-7215 or curdae@gao.gov.

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VA DISABILITY BENEFITS

Planning Gaps Could Impede Readiness for Successful Appeals Implementation

What GAO Found

In a March 2018 report, GAO made four recommendations to address planning gaps in the Department of Veterans Affairs' (VA) November 2017 plan for changing its appeals process for disability compensation claims. Since then, VA has updated its appeals reform plan and taken steps to address aspects of these recommendations, but further steps could enhance its readiness for implementation:

- **Address all legally required elements.** VA's November 2017 plan did not address one and only partially addressed four of 22 elements required by the Veterans Appeals Improvement and Modernization Act of 2017 (Act); GAO recommended VA fully address all 22. As of November 2018, VA addressed one element related to projecting productivity and took steps to partially address the other four. VA is still missing information the agency needs to certify that it has the resources needed to successfully implement appeals reform.
- **Articulate plans for performance monitoring and assessment.** GAO recommended VA clearly articulate how it will monitor and assess the new appeals process relative to the legacy process, including, for example, specifying timeliness goals for the five new appeals options, and measures for decision accuracy in processing appeals. As of November 2018, VA officials stated their intention to use productivity, timeliness, accuracy, and veteran satisfaction metrics to assess the new versus the legacy appeals processes. However, VA has yet to specify a complete set of goals or measures for monitoring and assessing the relative efficacy of the new process or articulate detailed steps and timeframes for establishing them.
- **Augment master schedule.** GAO recommended VA augment its master schedule for appeals reform to reflect sound practices for guiding implementation of reform. Although VA's updated schedule reflected progress since VA's original 2017 plan, it still did not fully meet sound practices for project management. For example, the schedule does not appropriately define the work, activities, and resources necessary to accomplish appeals reform implementation. Without following sound practices, it is unclear whether the schedule poses risks to successful implementation of appeals reform.
- **Address risk fully.** GAO recommended that VA's plan more fully address risks in implementing a new appeals process by, for example, testing all appeals options prior to full implementation. As of November 2018, VA took many steps to address risks, although opportunities exist to better assess them. For example, although VA has used lessons learned from tests to update the implementation process, it has not fully tested all aspects nor has it developed mitigation strategies for all identified risks, such as veterans appealing to the Board at higher rates than expected. Until VA takes these remaining steps, it may not have sufficiently accounted for key risks in implementing the new process.