

# US DEPARTMENT OF VETERANS AFFAIRS OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

**VETERANS BENEFITS ADMINISTRATION** 

VBA Did Not Ensure Employees
Sent Some Letters Using Its
Package Manager Application



## **OUR MISSION**

To serve veterans and the public by conducting meaningful independent oversight of the Department of Veterans Affairs.

## CONNECT WITH US $igotimes^* \begin{picture}(200,0) \put(0,0){\line(1,0){100}} \put(0,0){\line(1,0)$









Subscribe to receive updates on reports, press releases, congressional testimony, and more. Follow us at @VetAffairsOIG.

### PRIVACY NOTICE

In addition to general privacy laws that govern release of medical information, disclosure of certain veteran health or other private information may be prohibited by various federal statutes including, but not limited to, 38 U.S.C. §§ 5701, 5705, and 7332, absent an exemption or other specified circumstances. As mandated by law, the OIG adheres to privacy and confidentiality laws and regulations protecting veteran health or other private information in this report.



### **Executive Summary**

The Veterans Benefits Administration (VBA) uses physical mail for benefits-related communications, with each of its offices historically being responsible for printing and mailing these letters. In 2018, VBA began modernizing the mail process by initiating the Centralized Benefits Communication Management Program. Under the program, employees use an application called Package Manager to bundle documents from veterans' electronic claims folders and standard enclosures into virtual packages for printing and mailing. After bundling, employees must click a "send" button to move the package to a centralized print vendor. Packages may have one or more recipients. If there are multiple recipients, employees must click separate send buttons to move each package to the print vendor. If a send button is not clicked, the package for that recipient remains unsent. The VA Office of Inspector General (OIG) conducted this review to assess VBA's oversight of unsent packages in Package Manager after discovering that some packages did not have evidence that they were sent to intended recipients.

#### What the Review Found

The OIG found that VBA lacked oversight of unsent packages in Package Manager, resulting in about 2.1 million packages created from January 2018 through October 2022 that, according to their status, were still unsent as of November 10, 2022. While VBA had a control to identify packages that fail to print after employees send them in Package Manager, it did not develop controls to monitor instances when employees do not send the packages to the print vendor. The deputy under secretary for automated benefits delivery confirmed that no office had been charged with oversight duties for unsent packages. VBA representatives stated they have since developed a report to identify these packages.

VBA leaders did not establish controls for unsent packages because they did not anticipate that employees would create packages but not send them. Furthermore, although there were some instances of employee errors related to Package Manager, quality reviews by VBA had not identified a trend of employees failing to send packages.

After reviewing statistical samples of unsent packages, the OIG team estimated that about 801,000 of the 2.1 million packages lacked evidence of the letters being sent to one or more of the intended recipients.<sup>2</sup> The effect of each unsent package was unique. Some unsent packages did not affect veterans' benefits. For example, while some letters were meant to help veterans

<sup>&</sup>lt;sup>1</sup> For simplicity, this report refers to any contents of packages as "letters."

<sup>&</sup>lt;sup>2</sup> For the remaining approximately 1.3 million packages, there was evidence that (1) the letters were sent through other means to all intended recipients, (2) the letters were not intended to be sent (for example, a VA employee later determined that the letter was unnecessary), or (3) the packages had been deleted and were unavailable to review.

obtain evidence for their claims, those claims were ultimately granted without the evidence mentioned in these letters.

However, other unsent packages had the potential to affect veterans' benefits, such as those with letters requesting evidence for claims that were ultimately denied. In these cases, the claims were denied prematurely without fulfilling VBA's requirement to help the veteran obtain evidence.<sup>3</sup> The OIG team could not determine what would have happened in these cases had the letters been sent. Other unsent packages included required letters notifying veterans of decisions on their claims.<sup>4</sup> These notices are critical to ensuring veterans understand what decisions were made and why, the effect on their benefits, and their options for seeking further review.

#### What the OIG Recommended

The OIG recommended that the under secretary for benefits implement a plan to provide oversight for unsent packages in the Package Manager application and implement a plan for addressing unsent packages in the Package Manager application.

#### **VA Management Comments and OIG Response**

The under secretary for benefits concurred with both recommendations and provided responsive action plans. VBA indicated it was not yet able to provide a target completion date for recommendation 1. OIG personnel will begin their follow-up on the progress of VBA's actions in 90 days and will expect a more definitive implementation date at that time. The OIG will monitor VBA's progress and implementation of both recommendations until all proposed actions are completed. The full text of the under secretary's comments, except for attachments, is in appendix C.

LARRY M. REINKEMEYER

Assistant Inspector General

for Audits and Evaluations

Larry M. Reinkongen

<sup>&</sup>lt;sup>3</sup> 38 U.S.C. § 5103A.

<sup>&</sup>lt;sup>4</sup> 38 U.S.C. § 5104.

## **Contents**

Executive Summary	.i
Abbreviationsi	V
Introduction	1
Results and Recommendations	4
Finding: VBA Needs to Establish Oversight for Unsent Packages in Package Manager	4
Recommendations 1–2	9
Appendix A: Scope and Methodology1	1
Appendix B: Statistical Sampling Methodology	3
Appendix C: VA Management Comments	6
OIG Contact and Staff Acknowledgments1	9
Report Distribution	0

## **Abbreviations**

OIG Office of Inspector General

VBA Veterans Benefits Administration

VBMS Veterans Benefits Management System



#### Introduction

As part of administering a wide range of benefits and services, the Veterans Benefits Administration (VBA) sends letters to veterans, their representatives, and third parties. Historically, each office maintained responsibility for printing and mailing these letters. However, in 2018, VBA began modernizing this process by implementing the Centralized Benefits Communication Management Program. Under this program, employees use an application called Package Manager to create and manage electronic packages of letters, documents, or other enclosures that are later printed and mailed. For simplicity, this report refers to any contents of packages as "letters." As part of its ongoing oversight of VBA operations, the VA Office of Inspector General (OIG) identified unsent packages in Package Manager. The OIG conducted this review to assess VBA's oversight of these unsent packages.

#### Common Letters in Veterans' Electronic Claims Folders

VBA generally establishes electronic claims folders (eFolders) for veterans to store relevant documentation, including copies of any letters it generates to a veteran. There are multiple types of letters sent to veterans and others, each communicating different requests or information. For example, VBA is required to help veterans obtain evidence to support their claims and routinely sends development letters to veterans, medical professionals, employers, or others to request evidence supporting claims for benefits. If VBA employees process veterans' claims without ensuring these letters are mailed, they could prematurely deny the claims. VBA employees also send update letters to veterans periodically to keep them apprised of the status of their claims. Furthermore, employees are required to send notification letters to veterans and their representatives informing them of decisions made on benefits claims. Sending a veteran the notification letter is typically the final step needed to complete a claim. Without these notification letters, veterans may not understand what decisions were made and why, the effect on their benefits, and their options for seeking further review.

<sup>&</sup>lt;sup>5</sup> Unless otherwise noted, the term "veteran" used throughout this report includes other affected beneficiaries such as a service member or surviving spouse. A veteran's representative may be a veterans service organization, attorney, agent, or other accredited individual who helps the veteran navigate the VA claims process.

<sup>&</sup>lt;sup>6</sup> These electronic packages are referred to as "packages" throughout this report.

<sup>&</sup>lt;sup>7</sup> 38 U.S.C. § 5103A.

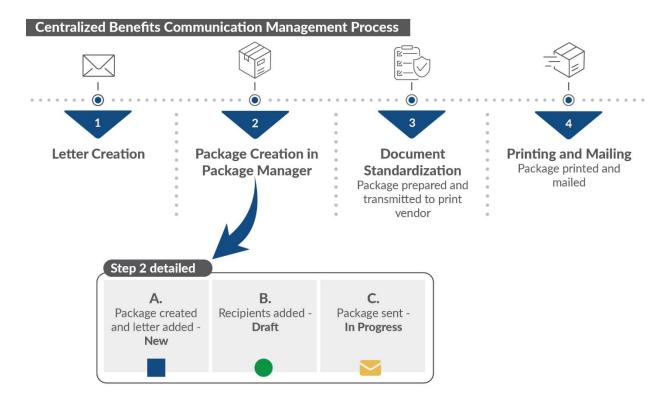
<sup>&</sup>lt;sup>8</sup> The term "employee" includes VA staff, managers, and contractors.

<sup>&</sup>lt;sup>9</sup> 38 U.S.C. § 5104.

### VBA's Transition to the Centralized Benefits Communication Management Program

Historically, VBA has relied on sending physical mail to veterans for benefits communications. Until 2018, this was a decentralized and manual process within each of VBA's offices. Employees printed letters from the eFolder, inserted them into envelopes, and mailed them. Typically, a veteran was presumed to have received a letter if a copy was in the eFolder.

In 2018, VBA deployed the Centralized Benefits Communication Management Program, an integral part of its commitment to ensuring communications are delivered timely and securely. Under this program, VBA modernized the claims process by centralizing, automating, and standardizing the printing and mailing of letters. Employees select letters from the eFolder, along with other documents and enclosures, to form a package that is then sent to centralized printing and mailing services. The most common process employees use to send packages through Centralized Benefits Communication Management has four steps, as shown in figure 1.



**Figure 1.** Steps for sending packages through the Centralized Benefits Communication Management process.

Source: OIG analysis.

The first step, letter creation, involves generating the documents (typically the letter) that the employee intends to send the recipient and uploading these items to the veteran's eFolder.

The second step, package creation, is the act of bundling the documents from the claims folder, as well as any standard enclosures, into a package in VBA's Package Manager application. 10 "New state" packages, also referred to as "new packages," are those that do not yet have recipient information entered. By addressing the package to one or more recipients, employees create a separate distribution for each recipient that is in "draft" status. Then, employees click the "send package" button, which updates the status to "in progress" and moves the distribution to the next step. Importantly, employees must click a unique "send package" button for each distribution. If a package has two recipients but the employee clicks "send package" for only one of them, the distribution for the second recipient will not move to the next step in the Centralized Benefits Communication Management process and the package will remain unsent. 11

Step three in the process is document standardization. Employees store documents in the eFolder as PDFs, which a contractor then converts into a standard format for commercial printing. Once converted, the packages are transmitted to another vendor for centralized printing and mailing at step four, the final step in the process.

Use of the Package Manager application began with VBA's Compensation Service and Pension and Fiduciary Service in 2018. It expanded over time to include VBA's Office of Administrative Review and Veteran Readiness and Employment Service, as well as the Board of Veterans' Appeals and the National Cemetery Administration. From January 2018 through October 2022, over 37 million packages were created using the application.

<sup>&</sup>lt;sup>10</sup> Package Manager is a custom application built by VA's Office of Information and Technology in conjunction with VBA subject matter experts.

<sup>&</sup>lt;sup>11</sup> For simplicity, the remainder of this report refers to both packages and distributions as "packages." The term "draft packages" refers to packages with one or more recipients' distributions still in a draft status, and the term "unsent packages" refers to both new and draft packages for which employees have not clicked "send package."

#### **Results and Recommendations**

## Finding: VBA Needs to Establish Oversight for Unsent Packages in Package Manager

The OIG found that VBA did not initially establish a plan to monitor unsent packages in its Package Manager application, resulting in about 2.1 million packages created from January 2018 through October 2022 that, according to their status, had not been sent to the centralized print vendor as of November 10, 2022. The team reviewed the veterans' eFolders to determine how many packages lacked evidence of the letters being sent to intended recipients through other means. From the results of the statistical samples, the review team estimated that about 801,000 of the 2.1 million packages lacked evidence of the letters being sent to one or more of the intended recipients. For the remaining approximately 1.3 million packages, there was evidence that (1) the letters were sent through other means to all intended recipients, (2) the letters were not intended to be sent, or (3) the packages had been deleted and were unavailable to review. 12

The deputy under secretary for automated benefits delivery confirmed that no office had been charged with monitoring these unsent packages. This occurred because VBA leaders said they did not anticipate that employees would fail to send packages. In addition, VBA quality reviews of claims-processing accuracy found a few errors related to Package Manager but not enough to identify a trend of employees failing to send packages. The effect of each unsent package was unique; however, some contained letters meant to help veterans obtain evidence supporting their claims or to notify them of decisions on their claims.

The team's finding is based on the following observations:

- VBA leaders did not establish oversight for unsent packages when implementing Package Manager.
- VBA did not anticipate employees would fail to send packages and had not identified this as a trend.
- Many intended recipients of unsent packages may not have received letters.

#### What the OIG Did

This report's focus is on the second step of the process, package creation. If the print vendor received and accepted a package, the team presumed the associated letter was mailed. The OIG team spoke with employees at VBA's program offices responsible for developing and

<sup>&</sup>lt;sup>12</sup> For example, the OIG team determined packages were not intended to be sent if a letter was created but a VA employee later determined the letter was unnecessary, even if they did not delete the package. Employees had deleted some other packages, which may have been created in error.

implementing Package Manager. The review team examined statistical samples of 48 of approximately 1.6 million draft packages and 48 of approximately 470,000 new packages that were created from January 2018 through October 2022 and were still unsent as of November 10, 2022. As of February 2024, VBA had developed a report to identify unsent packages, and VBA representatives told the OIG they were analyzing the results. Appendixes A and B provide additional details on what the review team did and the statistical sampling methodology used.

## VBA Leaders Did Not Establish Oversight for Unsent Packages When Implementing Package Manager

Although VBA devised a control to identify packages that fail to print after employees click "send" in Package Manager, VBA did not develop similar controls for new and draft packages that employees had not sent. The OIG team found about 2.1 million packages were created from January 2018 through October 2022 that were still in new state or draft status in Package Manager as of November 10, 2022. Figure 2 shows the number of these packages by calendar year.

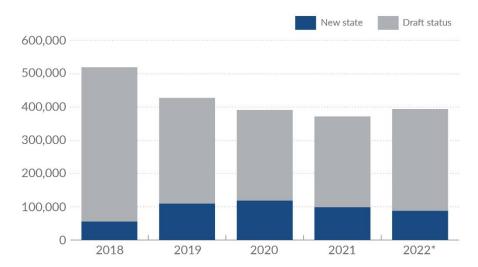


Figure 2. Packages created January 2018 through October 2022 that were still in new state or draft status in Package Manager as of November 10, 2022, by calendar year.

Source: OIG analysis of data obtained from VBA's VBMS database on November 10, 2022.14

<sup>\*</sup> Due to the scope of this review, calendar year 2022 includes only packages created from January 2022 through October 2022.

<sup>&</sup>lt;sup>13</sup> Although the sampled packages, by definition, had not been transmitted to the print vendor, the OIG team reviewed the veterans' eFolders to ensure there was no evidence of the associated letters being sent in another manner or not needing to be sent. The small sample sizes were sufficient to estimate the number of packages that lacked evidence of being sent.

<sup>&</sup>lt;sup>14</sup> The Veterans Benefits Management System (VBMS) is a web-based application designed to support end-to-end claims processing.

The OIG team interviewed employees from VBA's Office of Business Integration, Office of Field Operations, and Office of Policy and Oversight. When asked which office was responsible for monitoring new and draft packages, the interviewees were either unable to answer the question or referred the team to a different office. Ultimately, the deputy under secretary for automated benefits delivery reported that no office was previously charged with providing oversight. VBA representatives stated they have since developed a report to identify these packages, and they were analyzing it to find trends and determine the best path forward.

While VBA did not initially develop controls for new and draft packages, an assistant director with VBA's Office of Production Optimization told the OIG team that in February 2022 VBA released a banner feature that appears within the eFolder application to alert employees of potentially incomplete development tasks, including unsent packages in Package Manager. The banner feature was meant to help employees identify incomplete development tasks to improve workflow and complete claims more efficiently. The assistant director stated that this banner appeared only in certain circumstances and did not require employees to send unsent packages before completing a claims-processing action. She stated the banner had the potential to reduce unsent packages but acknowledged it would not eliminate them, as this was not the feature's intent.

The OIG's first recommendation is for VBA to implement a plan to provide oversight for unsent packages in the Package Manager application and periodically monitor its effectiveness.

## VBA Did Not Anticipate Employees Would Fail to Send Packages and Had Not Identified This as a Trend

VBA leaders did not establish monitoring of new and draft packages when developing the Package Manager application because they did not anticipate that employees would create packages but not send them. The OIG interviewed employees who were involved at the inception of the program, and those employees disclosed that they did not remember concerns regarding employees not sending packages. For example, the chief of project delivery services with the Office of Business Integration who served as the project manager for the Package Manager application development stated that the possibility of users neglecting to add recipients or click the "send" button when creating packages were not scenarios that were considered. Additionally, a senior management and program analyst currently with the Office of Policy and Oversight, who previously assisted with the implementation of Package Manager while working for the Compensation Service, also did not recall considering whether users might fail to add recipients or send packages. Further, VBA officials noted that quality reviews had found a few instances of errors related to Package Manager when examining claims for accuracy; however, they had not identified a trend of employees failing to send packages.

## Many Intended Recipients of Unsent Packages May Not Have Received Letters

The OIG team reviewed statistical samples of new and draft packages to determine how many lacked evidence in the eFolder of the associated letters being sent to the intended recipients. Although the status of the sampled packages meant they had not been sent to the centralized print vendor, the team reviewed the veterans' eFolders and then eliminated packages containing evidence that the letters had been sent to all intended recipients through other means. For example, in some cases there was evidence the letters had been locally mailed or were sent in other packages via Package Manager. The team also eliminated packages for which there was evidence that the letters were not intended to be sent, even though employees did not delete the packages. Finally, the team eliminated packages that could not be assessed because they had been deleted. For example, an employee could delete a package that was created in error.

Some packages were intended for multiple recipients that would be sent separately, such as to a veteran and the veteran's representative.<sup>17</sup> In these cases, the OIG team assessed whether the associated letters were sent to any of the intended recipients. From the results of the statistical samples, the review team estimated that about 801,000 packages lacked evidence of the letters being sent to one or more of the intended recipients.<sup>18</sup> Table 1 illustrates how many packages lacked evidence of letters being sent to any of the intended recipients and how many had evidence of letters being sent to at least one but not all intended recipients.

**Table 1. Packages Lacking Evidence of Letters Being Sent** 

Result	Estimate of new and draft packages
No evidence of letter being sent to any recipients	375,000
Evidence of letter being sent to at least one but not all recipients	426,000
Total	801,000

Source: VA OIG estimates of packages created January 2018 through October 2022 that were still in new state or draft status as of November 10, 2022.

<sup>&</sup>lt;sup>15</sup> The OIG cannot prove that a letter was not sent because a VBA employee could have locally printed and mailed it outside the Centralized Benefits Communication Management Program without documenting doing so. However, the review team could not verify whether letters were sent when there was no supporting evidence in the eFolder.

 $<sup>^{16}</sup>$  For example, this may occur when a letter is created but a VA employee later determines that the letter was unnecessary.

<sup>&</sup>lt;sup>17</sup> A veteran's representative may be a veterans service organization, attorney, agent, or other accredited individual who helps the veteran navigate the VA claims process.

<sup>&</sup>lt;sup>18</sup> For the remaining approximately 1.3 million packages, there was evidence that (1) the letters were sent through other means to all intended recipients, (2) the letters were not intended to be sent (for example, a VA employee later determined that the letter was unnecessary), or (3) the packages had been deleted.

The effect of each unsent package was unique depending on several factors including the purpose of the letter, the intended recipient(s), and any subsequent actions. For example, some letters were meant to help obtain evidence in support of veterans' claims, but the claims were ultimately granted without the evidence mentioned in these letters. These unsent packages did not affect veterans' benefits.

Some unsent packages, however, had the potential to affect veterans' benefits, such as those with letters requesting evidence for claims that were ultimately denied. In these cases, the claims were denied prematurely without fulfilling VBA's requirement to help the veteran obtain evidence.<sup>19</sup> However, the OIG team could not determine what would have happened in these cases if the letters had been sent. Example 1 describes an unsent package with a letter meant to help a veteran obtain evidence to support a claim that was denied.

#### Example 1

In January 2018, VBA received a veteran's claim for increased compensation based on unemployability.<sup>20</sup> On March 12, 2018, a package was created to send a required follow-up letter to one of the veteran's former employers requesting evidence to help support the claim.<sup>21</sup> The employer's name and address were added to the package, but the package was never sent. On March 29, 2018, the veteran's claim was prematurely denied since there was no evidence the follow-up letter was sent to the veteran's employer.

Some unsent packages included required letters notifying veterans of decisions on their claims.<sup>22</sup> Each notice is specific to the decisions made and is critical to ensuring veterans understand what decisions were made and why, the effect on their benefits, and their options for seeking further review. Additionally, a claim remains pending if a decision notice is not sent, even if employees close the claim in the electronic system. Example 2 describes an unsent package with a letter meant to notify a veteran's surviving spouse that burial benefits were denied.

#### Example 2

In January 2022, VBA received a claim for burial benefits from a veteran's surviving spouse. On April 11, 2022, a package was created to send her a notification letter that the claim was denied, and the claim was closed in the electronic system. However, no recipients were added to the package, and the

<sup>&</sup>lt;sup>19</sup> 38 U.S.C. § 5103A.

<sup>&</sup>lt;sup>20</sup> When a veteran is unable to secure and follow a substantially gainful occupation because of service-connected disabilities, VA policy states that the veteran should be rated totally disabled. 38 C.F.R. § 4.16 (2023).

<sup>&</sup>lt;sup>21</sup> VA Manual 21-1, "Requesting Employment Information from Employers," sec. IV.ii.2.F in Adjudication Procedures Manual, December 8, 2017, topic 2g.

<sup>&</sup>lt;sup>22</sup> 38 U.S.C. § 5104.

package was never sent. As a result, the claim was closed prematurely, and the surviving spouse may not be aware that a decision was made, the reasons for the decision, or her rights if she disagreed with the decision.

The OIG's second recommendation is for VBA to implement a plan to address existing unsent packages in Package Manager.

#### Conclusion

Physical mail plays an important role in VBA's claims process, particularly when letters are sent to help veterans obtain evidence supporting their claims or to notify them of decisions. VBA implemented the Centralized Benefits Communication Management Program and modernized the claims process by centralizing, automating, and standardizing the printing and mailing of letters. However, when doing so, VBA leaders did not establish oversight for unsent packages in the new Package Manager application. As a result, about 2.1 million packages were created from January 2018 through October 2022 that, according to Package Manager, remained unsent as of November 10, 2022. The review team estimated that about 801,000 of the 2.1 million packages lacked evidence of the letters being sent to one or more of the intended recipients. By implementing plans to provide oversight of unsent packages and address existing unsent packages, VBA can better ensure letters are mailed to all intended recipients.

#### Recommendations 1-2

The OIG recommends that the under secretary for benefits take the following actions:

- 1. Implement and periodically monitor the effectiveness of a plan to provide oversight for unsent packages in the Package Manager application.
- 2. Implement a plan to address existing unsent packages in the Package Manager application.

#### **VA Management Comments**

The under secretary for benefits concurred with both recommendations. Appendix C provides the full text of the under secretary's comments, except for the attachments.

For recommendation 1, the under secretary for benefits reported that VBA was forming a workgroup to develop an "IT solution" to prevent future unsent packages. In the interim, VBA created a report to provide visibility to monitor unsent packages in the Package Manager application and established a weekly requirement for all VA regional offices to review and take appropriate action based on the report for the prior week. VBA also updated its requirements for workload management plans to include providing oversight of unsent packages.

For recommendation 2, the under secretary for benefits reported that VBA implemented a plan to address existing and future unsent packages, including the development of an IT solution and

establishment of leadership oversight roles. Additionally, VBA had taken actions to delete certain automatically generated letters from the eFolder that were duplicative or obsolete and prevent automatic creation of some outdated letters going forward. VBA indicated it would monitor the effectiveness of its plan under recommendation 1. The under secretary requested to close recommendation 2.

#### **OIG Response**

The under secretary provided responsive action plans for both recommendations. For recommendation 1, VBA indicated it was not able to provide a target completion date until after its workgroup finalizes the requirements for the IT solution. OIG personnel will begin their follow-up on the progress of VBA's actions in 90 days and will expect a more definitive implementation date at that time. Although the OIG acknowledges that VBA implemented a plan and took several actions to address unsent packages, the OIG will consider closing recommendation 2 after receiving and reviewing additional supporting documentation. The OIG will monitor VBA's progress and follow up on implementation of both recommendations until all proposed actions are completed.

## **Appendix A: Scope and Methodology**

#### Scope

The team conducted its work from December 2022 through May 2024. The review team assessed packages that were created from January 2018 through October 2022 and were still in new state or draft status on November 10, 2022.

#### Methodology

To accomplish the review objectives, the VA Office of Inspector General (OIG) completed these actions:

- Reviewed applicable laws, policies, and procedures related to the Centralized Benefits Communication Management Program and notification requirements.
- Assessed two statistical samples, consisting of
  - o a stratified sample of 48 packages in new state and
  - o a stratified sample of 48 packages in draft status.
- Interviewed and obtained information from VBA employees at VA central office associated with the Centralized Benefits Communication Management Program.

#### **Internal Controls**

The review team assessed the internal controls over the Centralized Benefits Communication Management Program significant to the review objective. This included an assessment of the five internal control components including control environment, risk assessment, control activities, information and communication, and monitoring.<sup>23</sup> In addition, the team reviewed the principles of internal controls as associated with the objective. The team identified the following three components and three principles as significant to the objective.<sup>24</sup> The team identified internal control weaknesses during this review and proposed recommendations to address the following control deficiencies:

• Component: Control Environment

<sup>&</sup>lt;sup>23</sup> Government Accountability Office (GAO), Standards for Internal Control in the Federal Government, GAO-14-704G, September 2014.

<sup>&</sup>lt;sup>24</sup> Since the review was limited to the internal control components and underlying principles identified, it may not have disclosed all internal control deficiencies that may have existed at the time of this review.

- Principle 3: Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objective.
- Component: Risk Assessment
  - Principle 7: Management should identify, analyze, and respond to risks related to achieving the defined objectives.
- Component: Monitoring
  - o Principle 16: Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.

#### **Data Reliability**

The OIG team relied upon computer-processed data from the VBA's VBMS database, which the team validated by comparing sample data to VBA file numbers, package names, and created dates in the eFolder.<sup>25</sup> These comparisons were used to identify any discrepancies. Testing of the data disclosed that they were sufficiently reliable for the review objectives. Comparison of the data with information contained in the eFolders did not disclose any problems with data reliability, and the OIG did not find any discrepancies in the fields in any of the datasets.

#### **Government Standards**

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.

<sup>&</sup>lt;sup>25</sup> The Veterans Benefits Management System (VBMS) is a web-based application designed to support end-to-end claims processing.

## Appendix B: Statistical Sampling Methodology

#### **Approach**

To accomplish the objective, the review team reviewed stratified statistical samples of packages that were in new state or draft status. The team used statistical sampling to quantify the extent of records where there was no evidence of VA employees sending letters to one or more intended recipients.

#### **Population**

The review population included 470,359 new packages and 1,635,399 draft packages that were created from January 2018 through October 2022 and were still in new state or draft status on November 10, 2022.

#### Sampling Design

The review team selected statistical samples of 48 records each from two populations: the population of new packages and the population of draft packages. Each population was separated into groups of packages with similar names. Then, each sample was grouped into six strata. The first five strata consisted of packages with the five most frequently occurring name groups, and all other remaining packages were allocated to the sixth stratum.

#### Weights

Samples were weighted to represent the population from which they were drawn, and the weights were used in the estimate calculations. For example, the team calculated the number of packages with no evidence of the letter being sent to any recipients by summing the sampling weights for all sample packages with this result.

#### **Projections and Margins of Error**

The projection is an estimate of the population value based on the sample. The associated margin of error and confidence interval show the precision of the estimate. If the VA Office of Inspector General (OIG) repeated this audit with multiple sets of samples, the confidence intervals would differ for each sample but would include the true population value 90 percent of the time.

The OIG statistician employed statistical analysis software to calculate estimates, margins of error, and confidence intervals that account for the complexity of the sample design.

The sample size was determined after reviewing the expected precision of the projections based on the sample size, potential error rate, and logistical concerns of the sample review. While precision improves with larger samples, the rate of improvement decreases significantly as more records are added to the sample review.

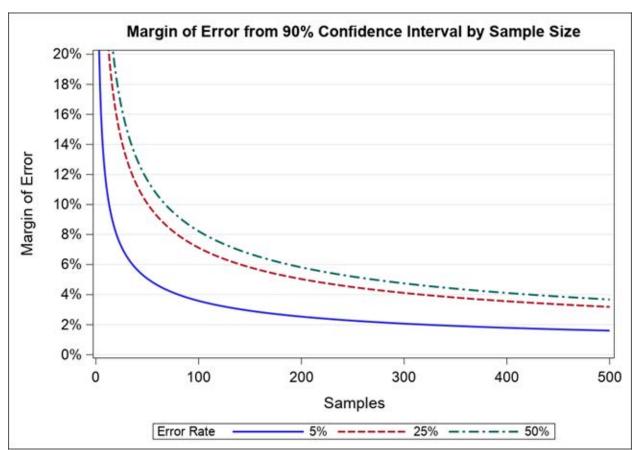


Figure B.1 shows the effect of progressively larger sample sizes on the margin of error.

Figure B.1. Effect of sample size on margin of error.

Source: VA OIG statistician's analysis.

### **Projections**

Table B.1 details the review team's analysis and projected results.

Table B.1. Statistical Projections Summary for New and Draft Packages (Combined)

Final	Estimate	90 percent	confidence inte	Sample count	Sample size	
disposition number	Margin of error	Lower limit	Upper limit			
No evidence of letter being sent to any recipients	375,027	160,142	214,885	535,169	19	96

Final Estimate		90 percent confidence interval			Sample	Sample
disposition number	Margin of error	Lower limit	Upper limit	count	size	
Evidence of letter being sent to at least one but not all recipients	425,684	153,558	272,126	579,242	18	96
No evidence of letter being sent to at least one recipient	800,711	204,262	596,449	1,004,972	37	96
Evidence of letter being sent to all recipients or not intended to be sent, or package deleted and unavailable for review	1,305,047	204,262	1,100,786	1,509,309	59	96

Source: VA OIG statistician's projection of package results based on team's findings.

Note: Projections and confidence intervals may not total precisely due to rounding.

## **Appendix C: VA Management Comments**

#### **Department of Veterans Affairs Memorandum**

Date: August 29, 2024

From: Under Secretary for Benefits (20)

Subj: Office of Inspector General (OIG) Draft Report - VBA Did Not Ensure Employees Sent Some Letters Using Its Package Manager Application [Project No. 2023-00547-AE-0017] — [VIEWS

11785810]

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review and comment on the OIG draft report: VBA Did Not Ensure Employees Sent Some Letters Using Its Package Manager Application. The Veterans Benefits Administration (VBA) provides the attached response to the draft report.

The OIG removed point of contact information prior to publication.

/s/

Joshua Jacobs

Attachment

Attachment

The Veterans Benefits Administration (VBA) concurs with the Office of Inspector General's draft report.

The following comments are submitted in response to the recommendations in the OIG draft report:

**Recommendation 1**: Implement and periodically monitor the effectiveness of a plan to provide oversight for unsent packages in the Package Manager application.

<u>VBA Response</u>: Concur. VBA's Office of Business Integration (OBI) is forming a workgroup consisting of subject matter experts from impacted business lines and staff offices to develop an IT solution to prevent the creation of future unaddressed draft packages. Currently, VBA is not able to provide a target completion date for this recommendation until after the workgroup finalizes the requirements for the IT solution.

In the interim, VBA created a Tableau report to provide visibility to monitor unsent packages in the Package Manager application. This report enables accountable offices to monitor packages that remain in an unsent status (see Attachment A). On June 3, 2024, the Office of Field Operations (OFO) established a weekly tasker requiring all VA regional offices (RO) to review and take appropriate action based on the Tableau report for the prior week (see Attachment B).

On May 29, 2024, VBA updated the M21-4, Chapter 2, *Workload Management Plans*, to include the Centralized Benefits Communications Management (CBCM) system providing oversight of unsent packages in the Package Manager application. This update establishes oversight requirements and directs the ROs to monitor and take corrective action to resolve unsent packages within Package Manager (see Attachment C).

Target Completion Date: TBD

**Recommendation 2**: Implement a plan to address existing unsent packages in the Package Manager application.

<u>VBA Response</u>: Concur. VBA developed and implemented the attached plan (see Attachment D) to address the inventory of unsent packages to include development of an IT solution and establishment of leadership oversight roles. Additionally, VBA has taken the following actions to address user behavior and correct identified system issues:

- On August 7, 2024, closed tickets requesting to delete unnecessary documents in the eFolder (see Attachment E & F). This action removed duplicative or obsolete auto-generated letters that matched letters manually generated by claims processors.
- On January 4, 2024, closed ticket that deleted 235,277 Draft Freedom of Information Act / Privacy Act (FOIA/PA) auto-generated letters (see Attachment G). Employees manually generate FOIA letters to ensure they contain relevant and up-to-date information reflecting the requested documents. These auto-generated letters contained obsolete information and were duplicative of the letters created by employees.
- On April 10, 2024, closed ticket that completed an enhancement suppressing the auto-generation of the outdated FOIA/PA letter (referenced in Attachment G) (see Attachment H).

On May 29, 2024, VBA also updated the M21-4, *Chapter 2, Workload Management Plans*, to include the Centralized Benefits Communications Management (CBCM) system, ensuring consistent messaging to all

VBA claims processors. This update establishes oversight requirements and directs Regional Offices to monitor and take corrective action to resolve unsent packages within Package Manager (see Attachment C). OBI will continue to support the review and reconciliation of "New" and "Draft" packages (as identified in the report) by the VA offices and VBA business lines that use Package Manager, as well as will coordinate the prioritization of IT investments to ensure technical solutions are deployed to prevent unaddressed draft packages in the future.

As VBA has implemented a plan (see Attachment D) to address existing and future unsent packages in the Package Manager application, we request closure of this recommendation. VBA will monitor the effectiveness of this plan under recommendation 1 above.

VBA requests closure of this recommendation.

For accessibility, the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.

## **OIG Contact and Staff Acknowledgments**

Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
Review Team	Dana Sullivan, Director Stephanie Hubbard Richard Johnson Jeffrey Myers Gregory Nelson Michele Stratton
Other Contributors	Laurence Adair Kendal Ferguson Michael Soybel Allison Tarmann

## **Report Distribution**

#### **VA Distribution**

Office of the Secretary
Veterans Benefits Administration
Veterans Health Administration
National Cemetery Administration
Assistant Secretaries
Office of General Counsel
Office of Acquisition, Logistics, and Construction
Board of Veterans' Appeals

#### **Non-VA Distribution**

House Committee on Veterans' Affairs

House Appropriations Subcommittee on Military Construction, Veterans Affairs, and Related Agencies

House Committee on Oversight and Accountability

Senate Committee on Veterans' Affairs

Senate Appropriations Subcommittee on Military Construction, Veterans Affairs, and Related Agencies

Senate Committee on Homeland Security and Governmental Affairs

National Veterans Service Organizations

Government Accountability Office

Office of Management and Budget

OIG reports are available at www.vaoig.gov.