



DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS HEALTH ADMINISTRATION

Potential Risks Associated
with Expedited Hiring in
Response to COVID-19

MANAGEMENT ADVISORY
MEMORANDUM

MEMO #20-00541-34

MARCH 11, 2021

The Office of Inspector General (OIG) has released this management advisory memorandum to provide information on matters of concern that the OIG has gathered as part of its oversight mission. 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, except for the standard of reporting as to advance review and comments.

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DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL
WASHINGTON, DC 20001



November 17, 2020¹

MANAGEMENT ADVISORY MEMORANDUM

TO: Dr. Richard Stone, Executive in Charge
Veterans Health Administration (10)

FROM: Larry Reinkemeyer, Assistant Inspector General for Audits and Evaluations
VA Office of Inspector General's Office of Audits and Evaluations (52)

SUBJECT: Potential Risks Associated with Expedited Hiring in Response to
COVID-19

The VA MISSION Act of 2018 mandates the Office of Inspector General (OIG) review and periodically report on VA's publicly posted staffing and vacancy data. During the most recent mandated staffing review, the OIG also examined information related to Veterans Health Administration (VHA) efforts to expedite hiring and onboarding to meet increased demand caused by the COVID-19 pandemic.² VHA's goal was to bring all new employees on duty within three days of making a tentative offer by modifying or deferring certain onboarding tasks. These include fingerprinting, background investigations, drug testing, credentialing, and preplacement physicals.

The OIG recognizes the tremendous pressure VA faced in meeting the unprecedented and significant challenges posed by the pandemic, which required swift hiring and reallocation of staff. In any such actions to expedite hiring processes, there are inevitable tensions with ensuring security and quality measures are attained. The purpose of this management advisory memorandum is to identify potential risks involved in the expedited hiring process. Although VHA may be aware of some or all of these concerns, this memorandum shares the OIG's

¹ This memorandum was sent to the Veterans Health Administration (VHA) on November 17, 2020, to provide the opportunity to review and comment. Following that period, VHA's comments were given full consideration and any requests for change supported by sufficient evidence were addressed before the report publication process was completed for March 2021 release.

² The Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law on March 27, 2020. The act included \$17.2 billion for VHA to hire new staff and make sure existing personnel had the resources needed to deal with the pandemic. VHA increased staffing to meet current and anticipated demand for pandemic-related care and to support non-VA healthcare systems as part of its fourth mission under 38 United States Code § 1785.

observations made during its review to help VHA determine if additional actions are appropriate.³

The potential risks identified by the OIG may threaten VHA's ability to safeguard veterans' sensitive information and to ensure its workforce is suitable for serving patients at VA medical facilities. The OIG organized these potential risks into three categories:

1. Employees who have not completed a fingerprint-based criminal history check may gain access to sensitive information and controlled substances.
2. Delays in processing fingerprints may add to a preexisting backlog of investigations.
3. Other deferred onboarding tasks—such as drug testing and credentialing—may not be centrally monitored to ensure completion.

The OIG did not test the likelihood of these risks occurring or determine if the vulnerabilities resulted in issues warranting further review. However, if the risks materialized, the consequences could damage the trust veterans have in VA keeping their information secure and ensuring their quality of care. This memorandum conveys information important for VHA to consider in determining if additional actions are warranted.⁴ The OIG is taking no additional steps at this time.

Employees without Fingerprint-Based Criminal History Check May Gain Access to Sensitive Veterans' Information and Controlled Substances

Access to veterans' sensitive information and to controlled substances may warrant greater safeguards for new VHA employees hired through expedited processes. Federal agencies were granted temporary onboarding flexibilities during the pandemic. The Office of Personnel Management (OPM) issued interim guidance for the vetting and appointment of new employees during COVID-19.⁵ From this guidance, VHA implemented an expedited onboarding process

³ The OIG interviewed 47 employees in VHA's Office of Workforce Management and Consulting, various Veterans Integrated Service Networks (VISNs), and associated medical facilities from May through August 2020. This included VISN 4 and the Corporal Michael J. Crescenz VA Medical Center in Philadelphia, Pennsylvania; VISN 16 and the Southeast Louisiana Veterans Health Care System in New Orleans; and VISN 19 and the VA Eastern Colorado Health Care System in Aurora.

⁴ The memorandum provides information gleaned from interviews and other information requests during the OIG's review of staffing and vacancy reporting under the VA MISSION Act of 2018. The OIG issues management advisory memorandums when exigent circumstances or areas of concern are identified by OIG hotline allegations or in the course of its oversight work, particularly when immediate action by VA can help reduce further risk of harm to veterans or significant financial losses. These are published unless otherwise prohibited from release or to safeguard protected information.

⁵ OPM Memorandum, "Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19," March 25, 2020.

that modified or deferred vetting tasks with the goal of bringing new employees on duty within three days of making a tentative employment offer (as reflected in table 1, presented later in this memorandum).

Prior to OPM issuing the interim guidance, VA required that all personnel be subject to an appropriate background screening before granting them access to VA records and information systems.⁶ This screening, referred to as a Special Agreement Check, is initiated by obtaining a candidate's fingerprints and submitting them to the Federal Bureau of Investigation (FBI) for a limited criminal history check. A Special Agreement Check should generally be completed prior to employment but must be completed before a full background investigation is initiated. A new employee is prohibited from accessing VA information and systems until the fingerprint-based screening has been completed, which provides a degree of assurance that the individual is not subject to an ongoing inquiry or has a prior criminal conviction that could affect suitability for the position.⁷

Due to measures associated with the COVID-19 pandemic, fingerprinting new employees cannot always be completed. The local fingerprinting office may be closed, or the new employee may not be able to travel to a fingerprinting office. OPM granted flexibility for Special Agreement Check screenings in situations such as these.⁸ VA's Office of Human Resources and Administration used this guidance and established an alternative approach when delays in fingerprinting would postpone onboarding by three days or more or when fingerprinting cannot be completed. In these instances, VHA defers obtaining and submitting fingerprints to the FBI for a Special Agreement Check.⁹ In the interim, VHA submits a background investigation request to the Defense Counterintelligence and Security Agency, which conducts a name-based check of the FBI's criminal history records.¹⁰

While the modified approach permits VHA to continue onboarding staff at a time of critical need, the absence of fingerprint-based vetting does come with a degree of risk. The name-based check may not identify or capture all relevant records. For example, a candidate who changed his

⁶ Homeland Security Presidential Directive 12, *Policy for a Common Identification Standard for Federal Employees and Contractors*, August 27, 2004; VA Directive 0735, *Homeland Security Presidential Directive 12 (HSPD-12) Program*, October 26, 2015. The presidential directive establishes this requirement for all executive departments and agencies. The VA directive implements this requirement and establishes department-wide policy.

⁷ VA Directive 0710, *Personnel Security and Suitability Program*, June 4, 2010.

⁸ OPM Memorandum, "Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19."

⁹ On October 19, 2020, VHA's Office of Workforce Management and Consulting released Personnel Security Advisory 21-01, *Vetting Options Under Three-Day Hiring*. This guidance stated that, for operational personnel security offices, the Special Agreement Check must be adjudicated and the electronic questionnaire for initiating the background investigations must be submitted to the Defense Counterintelligence and Security Agency within 14 days of the employee's entrance on duty.

¹⁰ The functions of the Office of Personnel Management's National Background Investigations Bureau have been transferred to the Department of Defense's Defense Counterintelligence and Security Agency.

or her identity and did not disclose that change through the application might not be identified by the name-based search alone. Further, the name-based check does not include files at the FBI that can only be searched using fingerprints. According to the FBI's Criminal Justice Information Services Division, fingerprints provide positive identification and eliminate false positives and false negatives associated with name-based checks, thus ensuring the government does not employ an unsuitable individual.

While waiting for the fingerprint-based criminal history screening, VA continues the process of determining the suitability of the employee. The process seeks to ensure the employee is reliable, trustworthy, and fit for federal employment. The employee completes an electronic questionnaire that is submitted to the Defense Counterintelligence and Security Agency, which conducts the investigation. Because the responses are self-reported, the process relies on the individual providing accurate and sufficiently detailed information to VA. Additionally, the process does not satisfy the criminal history component of the background investigation or replace the need to obtain a Special Agreement Check.

The expedited onboarding process allows VA to increase staff and grant them access to the VA network and facilities, which may include access to sensitive information. VHA reported adding more than 55,000 employees from March 29 to early October 2020.¹¹ Many of those new hires were clinicians, such as nurses and physicians, who need access to protected health information to do their jobs. A human resources official in one regional Veterans Integrated Service Network (VISN) confirmed that staff hired under the expedited process have access to sensitive information and controlled substances before the investigative process is completed.

The OIG acknowledges that VHA is limited by the guidance issued by OPM and the Defense Counterintelligence and Security Agency and understands the intent of the name-based check is to bring staff onboard amid fingerprinting delays. However, the potential exposure of sensitive information and the access to controlled substances may warrant greater safeguards and supervision. The delays in obtaining fingerprints for a Special Agreement Check and the processing time for background investigations may create a period during which a new employee is not vetted. For that reason, the damage to VA and veterans may already have occurred before that information is received and adjudicated.

Delays in Processing Fingerprints May Add to a Preexisting Backlog of Investigations

Eventually all new employees must be fingerprinted. Agencies are unable to render and report final adjudication decisions on background investigations until fingerprint checks have been completed and considered. Due to this requirement, pandemic-related fingerprinting delays may

¹¹ The OIG did not verify the number of hired employees during this period.

also create a secondary risk to VHA by exacerbating previously identified weaknesses in the human resources function.

In March 2018, the OIG published an audit report detailing deficiencies in the personnel suitability program.¹² In particular, the OIG determined that suitability program staff had not been consistently adjudicating background investigations within OPM's 90-day requirement.¹³ VA subsequently improved components of the personnel suitability program. VA implemented an inspection program, measured quality and timeliness metrics, and provided monthly reports to its facilities. In addition, VHA issued a directive that established a VHA personnel security program office and set policy to govern the personnel suitability program.¹⁴ It also appointed VISN human resources officers as suitability coordinators, and standardized local policies and procedures. However, as of March 2021, five recommendations from that report remained open. To address those five recommendations, VA conducted an audit of all personnel to confirm all background investigation requirements have been met. In addition, VA established a team that conducted a comprehensive review of policies and processes for the personnel suitability program. VA also deployed a centralized background investigation system to standardize and automate background investigation processing and tracking.

The actions VA has taken to improve the personnel suitability program are positive. However, until all corrective actions are complete, the timely adjudication and reporting of background investigations remain a risk. The risk is amplified by the large number of new employees appointed as a result of VHA's expedited hiring efforts and the temporary measures taken to bring staff on duty during the pandemic.

If VHA experiences a large volume of fingerprinting delays, it would likely adversely affect other components of the suitability process. For example, corrective mechanisms VA is implementing to address the backlog in the personnel suitability adjudication process may be temporarily offset. In May 2020, VA reported implementing an electronic tool that automatically renders decisions on background investigations when no issues were found. VA reported in November 2019 that almost half of overdue adjudications would be eligible for this automated method. However, current business rules for the tool render any cases delivered without a fingerprint check ineligible for automatic adjudication.¹⁵ In these instances, an adjudicator would have to manually render a decision on the investigations.

¹² VA OIG, *Audit of Personnel Suitability Program*, Report No. 17-00753-78, March 26, 2018.

¹³ The OIG projected that about 10,400 cases were not timely adjudicated. In some instances, investigations had not been adjudicated at all because of ineffective internal controls over the personnel suitability program.

¹⁴ VHA Directive 0710, *VHA Personnel Security and Suitability Program*, October 11, 2018.

¹⁵ Defense Counterintelligence and Security Agency Federal Investigations Notice No. 20-03, "Temporary Deferral of Fingerprinting due to COVID-19 Impacts," March 30, 2020.

Further, per the OPM interim guidance, VA may review or adjudicate a background investigation but should delay reporting the outcome until the fingerprints have been submitted, received, and considered. This means the final decision on the background investigation cannot be reported to the Defense Counterintelligence and Security Agency or considered complete until a fingerprint is captured and the Special Agreement Check is adjudicated. Essentially, in the absence of a fingerprint check, VA can only advance the vetting of a new employee to a certain point before adding to the adjudication backlog.

Overall, the temporary deferral of fingerprinting to permit continued onboarding in response to the demands of the pandemic may affect the adjudication and reporting of background investigations. The deferral could add to the existing backlog, delay full vetting of employees, and necessitate a review of processes that support backlog reduction. In the absence of completed background investigations, greater safeguards may also be warranted for new hires until vetting is complete.

Other Deferred Onboarding Tasks May Not Be Centrally Monitored to Ensure Completion

A centralized governance structure could help VA ensure continuous monitoring and oversight of critical onboarding tasks, such as drug testing and credentialing. Local human resources staff are generally responsible for ensuring that onboarding tasks are completed, most of which must normally be completed prior to appointment. However, a March 17, 2020, Office of Management and Budget memorandum directed agency heads to adjust operations to minimize face-to-face interactions.¹⁶ Additionally, OPM’s interim guidance, discussed earlier, granted temporary onboarding flexibilities during the pandemic.¹⁷ VHA leveraged this guidance and implemented an expedited onboarding process that modified or deferred certain tasks to meet critical hiring needs during the pandemic (table 1).

Table 1. Completion Requirements for Onboarding Tasks

Onboarding task	Pre-COVID requirement	COVID requirement
Preplacement physical exam	Prior to appointment	No later than 12 months from date of hire
Tuberculosis screening	Prior to appointment	On first day of work
Pre-employment drug testing	Prior to appointment	No later than 90 calendar days from date of appointment

¹⁶ Office of Management and Budget Memorandum M-20-16, “Federal Agency Operational Alignment to Slow the Spread of Coronavirus COVID-19,” March 17, 2020.

¹⁷ OPM Memorandum, “Temporary Procedures for Personnel Vetting and Appointment of New Employees during Maximum Telework Period due to Coronavirus COVID-19.”

Onboarding task	Pre-COVID requirement	COVID requirement
Fingerprinting for Special Agreement Check	Prior to appointment, but no later than five days after the employee's first day	As soon as practicable (no specific timeline given)
Background investigation	Initiated prior to appointment, but no later than 14 days after the employee's first day based on favorable fingerprint check	Requirements satisfied when temporary guidance is lifted (no specific timeline given)
Credentialing	Full credentialing prior to appointment	Temporary/expedited credentialing prior to appointment; full credentialing within 120 days

Source: VA OIG analysis of guidance issued by OPM, the VA Office of the Chief Human Capital Officer, and the VHA Office of Workforce Management and Consulting.

The OIG did not assess the appropriateness of the modified completion dates for these tasks. However, the range of target completion dates, accompanied by the unspecified timeline for fingerprinting and background investigations, may increase the risk that local human resources staff do not adequately track all tasks.

It was unclear if current mechanisms would permit VHA to ensure that new employees complete the deferred onboarding requirements in the future. In response to the expedited onboarding process, VA's Office of Human Resources and Administration added indicators to the USA Staffing system for tracking the status of postponed tasks.¹⁸ However, VHA's Office of Workforce Management and Consulting appeared to instruct human resources staff not to enter any of the deferred onboarding task completion dates in the system until all new employees' onboarding tasks have been completed.¹⁹ VHA's ability to monitor the status of individual tasks could be limited if staff are not entering these data in real time.

According to the VHA chief human capital manager, the Office of Workforce Management and Consulting will be conducting audits to ensure the onboarding tasks are done correctly. For example, as of June 2020, VHA was conducting an audit of personnel security. Similarly, a VISN human resources officer said the VISN's compliance unit would conduct future audits of onboarding tasks to ensure they were completed as required. While these audits would identify deferred items that have already lapsed, they may come too late for facilities to address these tasks in real time and before required completion dates. For example, some employees hired on a temporary basis may complete their period of employment before some tasks are complete, according to a VISN human resources official.

¹⁸ USA Staffing is an OPM-administered system that federal agencies use to recruit, assess, certify, select, and bring employees into their organizations.

¹⁹ VHA Workforce Management and Consulting, *USA Staffing and COVID-19 Positions*, April 9, 2020.

Without continuous monitoring and oversight of deferred items for VA medical facilities nationwide, VHA risks having employees who have not undergone critical onboarding requirements such as drug testing and credentialing. The importance of these tasks may warrant increased, centralized governance to allow VHA to maintain accountability and adequate oversight.

Conclusion

During the OIG's mandatory review under Section 505 of the VA MISSION Act of 2018, the review team obtained information related to VHA's expedited hiring and onboarding process. The team did not evaluate the merits of that expedited process but did identify potential risks that warranted sharing concerns with VHA about safeguarding veterans' sensitive information and ensuring its workforce is suitable for serving veterans. Although VHA may be aware of these issues, it is hoped this memorandum provides confirmation or additional information that will be of value to VHA if additional action is deemed appropriate.

The OIG performed this work in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation* for competency, independence, professional judgment, quality control, planning, records maintenance, timeliness, fraud, reporting, and performance measurement. At this time, the OIG is not initiating an audit or an investigation into these potential risk areas.

Requested Action

The OIG requests that VHA inform the OIG what action, if any, VHA takes to mitigate the potential risks identified in this memorandum and the outcome of those actions.

Management Comments

The acting under secretary for health's response did not identify any actions planned to address the risks presented in this memorandum, stating that mitigating action has already been taken to address the risks the OIG identified. The acting under secretary provided several comments for consideration, and noted that the OIG's information related to VHA's abilities to enter, monitor, and track onboarding tasks was inaccurate. Further, the acting under secretary said that since fingerprint offices were deemed mission-essential, widespread office closures did not occur.

The acting under secretary also stated that in October 2020, Workforce Management and Consulting provided vetting guidance related to VHA's three-day hiring model to ensure that postponement of traditional pre-hire personnel security activities "does not incur additional risk for veterans, employees, and the Department." Finally, the acting under secretary stated that VHA had already acted in March and April 2020, at the onset of the COVID-19 pandemic, to monitor pending pre-employment clearances. Specifically, human resources staff can track all pending requirements individually in the USA Staffing system until they are completed.

The appendix provides the full text of the acting under secretary's comments.

OIG Response

Regarding the mitigating actions noted by the acting under secretary, the OIG had obtained and analyzed the March and April 2020 guidance during its review. These items were used as evidence to form the basis for this memorandum, and do not represent new information or mitigate the risks identified. The OIG reviewed additional documentation obtained from VHA's Office of Workforce Management and Consulting and source material for statements questioned by the acting under secretary and determined that this OIG memorandum accurately represents the criteria identified.

The OIG also reviewed the October 2020 guidance issued by Workforce Management and Consulting related to the three-day hiring process and determined that it did establish a more precise limit on the time a fingerprint may be delayed by operating personnel security offices. VHA's guidance was in place about one month before the OIG issued this memorandum in draft. As such, the OIG added a footnote on page 3 of the memorandum to acknowledge this limit to fingerprint delays.

The OIG has several clarifications concerning the acting under secretary's comments relating to the closure of fingerprint offices and the tracking of onboarding tasks. As indicated on page 3 of the memorandum, OPM granted flexibility for Special Agreement Checks and VA subsequently established an alternative approach if the fingerprinting offices were closed due to the COVID-19 pandemic. The OIG identified that the absence of fingerprint-based vetting would come with a degree of risk, but the team did not assess the likelihood that this risk could occur or determine if the vulnerabilities resulted in issues warranting further review. While the acting under secretary's response reported that widespread fingerprint office closures had not occurred, VHA told the review team in December 2020 that 512 new hires were processed using the name-based alternative approach during the pandemic.²⁰ Each use of the name-based approach constitutes an increased risk. Further, while this risk may not have been realized in the past, the risk remains relevant into the future while fingerprint flexibilities remain in place.

Additionally, as discussed on page 7 of the memorandum, the OIG determined that it was unclear if current mechanisms would permit VHA to ensure new employees complete the deferred onboarding requirements in the future. The review team found that a VHA Office of Workforce Management and Consulting job aid appeared to instruct human resources staff not to enter any of the deferred onboarding task completion dates in the system until all new employees' onboarding tasks have been completed. This job aid was in place through at least December 2020. Following the November 2020 release of the OIG's draft memorandum for review and comment, VHA updated its guidance and provided it for OIG review in

²⁰ The OIG did not verify the number of hired employees processed using the alternative name-based approach.

January 2021. The guidance clarifies that the indicator for pending onboarding tasks should not be marked as complete until all the postponed requirements have been met. The OIG acknowledges this correction to VHA's guidance after the release of a draft of this memorandum and considers the matter closed.

Appendix: Management Comments—Acting Under Secretary for Health

Department of Veterans Affairs Memorandum

Date: February 10, 2021

From: Acting Under Secretary for Health (10)

Subj: OIG Management Advisory Memorandum: Potential Risks Associate with Expedited Hiring in Response to COVID-19 (VIEWS 04523867)

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

1. Thank you for the opportunity to review and comment on the Office Inspector General (OIG) Management Advisory Memorandum: Potential Risks Associate with Expedited Hiring in Response to COVID-19.
2. The Veterans Health Administration (VHA) noted an inaccuracy in the draft memorandum related to staff's abilities to enter data, monitor, and track onboarding tasks. In April 2020, VHA's Workforce Management and Consulting (WMC) issued the Personnel Security Advisory 20-03: COVID-19 Interim Suitability & Fingerprint Guidance. The advisory contained specific steps that are required if Human Resources (HR) Offices defer fingerprint activities. The purpose of the advisory was to minimize risk by ensuring that an interim suitability review was completed when fingerprint services were not available. Since Personal Identification Verification/fingerprint offices are deemed mission-essential, widespread office closures have not occurred.
3. In October 2020, WMC published Personnel Security Advisory 21-01: Vetting Options Under 3-Day Hiring, to provide vetting guidance related to VHA's Three-Day Hiring Model to ensure that deferment of traditional pre-hire personnel security activities does not incur additional risk for Veterans, employees, and the Department.
4. VHA has already taken actions to mitigate the potential risks identified in this advisory memorandum. The USA Staffing Onboarding Manager system is already established to afford central monitoring of pending pre-employment clearances, and the guidance for its use was disseminated to the field on March 27, 2020, and April 9, 2020. In the USA Staffing Onboarding Manager system, HR staff can individually track all pending pre-employment clearances through to completion. In addition, there is a stand-alone task in Onboarding Manager titled "Pending COVID-19 Onboarding Tasks," which allows HR to flag the entire record as pending pre-employment requirements, and, as a quality assurance mechanism, it is intended to remain unchecked until all pre-employment clearances are received.
5. Comments regarding the contents of the Acting Under Secretary's memorandum may be directed to the GAO OIG Accountability Liaison Office at VHA10BGOALAction@va.gov.

(Original signed by)

Richard A. Stone, M.D.

OIG Contact and Staff Acknowledgments

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