

GAO

Report to the Ranking Democratic
Member, Committee on Veterans'
Affairs, House of Representatives

December 2006

**VETERANS'
DISABILITY
BENEFITS**

**VA Can Improve Its
Procedures for
Obtaining Military
Service Records**





Highlights of [GAO-07-98](#), a report to Ranking Democratic Member, Committee on Veterans' Affairs, House of Representatives

Why GAO Did This Study

The Ranking Democratic Member, House Committee on Veterans' Affairs, asked GAO to determine (1) whether VA's internal assessments indicate its regional offices are complying with the requirements of the Veterans Claims Assistance Act (VCAA) of 2000 for obtaining military service records for veterans' disability compensation claims and (2) whether VBA could improve its procedures for obtaining military service records for claims involving post-traumatic stress disorder (PTSD).

What GAO Recommends

GAO recommends that VA take the following actions.

To ensure the quality of research done on behalf of regional offices by VBA's records research unit at the National Personnel Records Center, VBA should implement a systematic quality review program to evaluate and measure the accuracy of the unit's responses to regional office research requests.

To improve timeliness in deciding PTSD claims, VBA should assess whether it could systematically utilize an electronic library of historical military records to identify veterans whose PTSD claims can be granted on the basis of information contained in such a library, rather than submitting all research requests to DOD's Joint Services Records Research Center.

VA concurred with our findings and recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-07-98.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Robert E. Robertson (202) 512-7215 or robertsonr@gao.gov.

VETERANS' DISABILITY BENEFITS

VA Can Improve Its Procedures for Obtaining Military Service Records

What GAO Found

The Department of Veterans Affairs' (VA) internal assessments indicate its regional offices generally comply with VCAA's requirements for obtaining military service records for veterans' compensation claims. For example, of the decisions made by regional offices on compensation claims during the first half of fiscal year 2006, Veterans Benefits Administration (VBA) quality reviewers found that less than 4 percent contained errors involving failure to obtain military service records. Similarly, of the appealed compensation cases decided by the Board of Veterans' Appeals during November 2004-January 2006, the board remanded less than 3 percent to VBA for rework due to deficiencies in obtaining military service records. However, VBA does not systematically evaluate the quality of research done on behalf of regional offices by a VBA unit at the National Personnel Records Center, where the service records of many veterans are stored. Regional offices rely on this unit to do thorough and reliable searches and analyses of records and provide accurate reports on the results. Without a systematic program for assessing the quality of this unit's work, VBA does not know the extent to which the information that this unit provides to regional offices is reliable and accurate.

VBA potentially could improve its procedures and reduce the time required to process some veterans' claims for PTSD, which may result after a veteran participates in, or is exposed to, stressful events or experiences (stressors). Regional offices sometimes must turn to information contained in the military historical records of the Department of Defense (DOD) to verify the occurrence of claimed stressors. While regional offices are able to directly access and search an electronic library of such records for many Marine Corps veterans, they must rely on DOD's U.S. Army and Joint Services Records Research Center (JSRRC) to research such records for all other service branches. The JSRRC's response time to regional office requests approaches an average of 1 year. However, by building on work already done by several regional offices to establish and use an electronic library of DOD military historical records for the other service branches, VBA may be able to greatly reduce the time required to process many veterans' PTSD claims.

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Abbreviations

DOD	Department of Defense
JSRRC	Joint Services Records Research Center
PIES	Personnel Information Exchange System
PTSD	post-traumatic stress disorder
STAR	Systematic Technical Accuracy Review
VA	Department of Veterans Affairs
VACOLS	Veterans Appeals Control and Locator System
VBA	Veterans Benefits Administration
VCAA	Veterans Claims Assistance Act

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United States Government Accountability Office
Washington, DC 20548

December 12, 2006

The Honorable Lane Evans
Ranking Democratic Member
Committee on Veterans' Affairs
House of Representatives

Dear Mr. Evans:

In fiscal year 2005, the Department of Veterans Affairs (VA) paid about \$24.4 billion in cash benefits to approximately 2.6 million veterans to compensate them for disabling medical conditions connected to injuries or diseases they incurred or aggravated during active duty military service. During that year, VA made decisions on about 198,000 original disability compensation claims. Under the Veterans Claims Assistance Act (VCAA) of 2000, VA is assigned the duty to assist veterans in obtaining any records relevant to their claims, provided the veterans adequately identify such records so that VA is able to request them. In addition to military service records, relevant records can include, for example, records related to medical treatment provided by VA or private health care providers and disability decisions made by the Social Security Administration. When needed to make a decision, the act also requires VA to obtain a medical opinion or a current medical examination of the veteran. VA relies on the Veterans Benefits Administration (VBA) and its 57 regional offices to meet the requirements of this law. Failure to comply with the requirements for obtaining relevant records could result in veterans not receiving benefits they deserve. You asked that we determine (1) whether VA's internal assessments indicate regional offices are complying with the law's requirements for obtaining military service records and (2) whether VBA could improve its procedures for obtaining military service records for claims involving post-traumatic stress disorder (PTSD).

To address this request, we obtained and analyzed the federal regulations promulgated by VA to implement the duty-to-assist provisions of the Veterans Claims Assistance Act; VBA's written procedures for obtaining military service records from appropriate custodians, such as the National Personnel Records Center; VBA's user manuals for automated systems that regional offices use to request military service records from certain custodians; VBA's procedures for and data from its reviews of the quality of regional office decisions; and procedures of and data from the Board of Veterans' Appeals for its reviews of regional office decisions appealed by

veterans. In the process of collecting and analyzing such documents and data, we interviewed key officials of VBA and its regional offices, the board, veterans' advocacy groups, and custodians of military service records. For more details on our scope and methodology, see appendix I. We conducted our work during November 2005 to December 2006 in accordance with generally accepted government auditing standards.

Results in Brief

VA's internal assessments indicate that regional offices generally comply with the requirements of the Veterans Claims Assistance Act for obtaining veterans' military service records. The VBA quality review unit has found that less than 4 percent of regional office compensation decisions contain errors involving regional offices' failing to obtain military service records as required by the act. Similarly, data compiled by the Board of Veterans' Appeals show that when the board remands appealed compensation cases to VBA for rework, only about 3 percent of the reasons for such remands involved regional offices' failing to comply with the law's requirements for obtaining military service records. However, VBA does not systematically evaluate the quality of research done on behalf of regional offices by a VBA unit at the National Personnel Records Center, where the service records of many veterans are stored. Although regional offices rely on the VBA unit at the National Personnel Records Center to do thorough and reliable searches and analyses of records and provide accurate reports on the results, VBA does not have a systematic program for assessing the quality of this VBA unit's work and, therefore, does not know the extent to which the information that this unit provides to regional offices is reliable and accurate.

VBA potentially could improve its procedures and reduce the time required to process some veterans' claims of PTSD. This disorder may result after a veteran participates in, or is exposed to, stressful events or experiences (stressors) occurring during combat, prisoner-of-war detainment, or noncombat events, such as plane crashes, sinking of ships, explosions, burn ward duty, and graves registration duty. When verifying the occurrence of claimed stressors, regional offices sometimes cannot find needed evidence in the veteran's own service records and must turn to information contained in the military historical records of the Department of Defense (DOD). While regional offices are able to directly access and search an electronic library of such records for many Marine Corps veterans, they must rely on a DOD research organization to research such records for all other service branches. The DOD research organization's average response time to regional office requests approaches 1 year. However, VBA may be able to build on work already

done by several regional offices to establish an electronic library of DOD military historical records for the other service branches and greatly reduce the time required to process the PTSD claims of many veterans.

We are recommending that the Secretary of the Department of Veterans Affairs direct the Under Secretary for Benefits to (1) implement a systematic quality review program of records research performed by the VBA unit at the National Personnel Records Center and (2) assess whether VBA could improve its timeliness in deciding PTSD claims by systematically utilizing an electronic library of historical military records to identify veterans whose PTSD claims can be granted.

Background

Veterans submit their disability compensation claims to 1 of VBA's 57 regional offices. These claims contain, on average, five disabling medical conditions that the veteran believes are service connected. For each claimed condition, VA must determine if credible evidence is available to support the veteran's contention of service connection. VA grants service connection for an average of three of the five conditions claimed by a veteran. Key sources of evidence for determining service connection are veterans' military service medical and personnel records. To determine service connection in some cases, VA also may need to obtain information from DOD historical military records for the units in which veterans served.

VBA's regional offices face a complex task in obtaining veterans' military service records because (1) service records consist of numerous types of records that can originate from numerous sources within or outside DOD, (2) the process for collecting and storing service records has varied substantially for different groups of veterans over time, (3) service records cannot always be found at the expected storage locations, and (4) the service records of many veterans were destroyed by a fire in 1973 at the National Personnel Records Center, a primary repository for service personnel and medical records. For detailed information on military service records, including the types and locations of the records and the process for collecting and storing them, see appendix II.

Once a claim has all the necessary evidence, the regional office evaluates the claim and determines whether the claimant is eligible for benefits. If a veteran disagrees with a regional office's decision on any of the issues in his or her claim, the veteran may file an appeal with the Board of Veterans' Appeals, requesting a more favorable decision. In many cases, the board finds it cannot make a final decision on a veteran's appeal until VBA does

additional work on the case. In such cases, the board sends (remands) the case back to VBA to perform the necessary additional work. The additional work required for remands can include making initial or follow-up attempts to obtain relevant records in accordance with the requirements of the Veterans Claims Assistance Act.¹ Under the act, if relevant records—such as military service records—are believed to be in the custody of a federal agency, VBA’s regional offices must continue requesting the records until either the agency provides the records or the regional office is reasonably certain the records do not exist or that further efforts would be futile.² VA’s regulations state that the regional office cannot discontinue its efforts unless it has obtained a statement from the agency advising VA that the records either do not exist or are not in the agency’s possession. For detailed information on VA’s disability compensation claims and appeals process, see appendix III.

Internal Assessments Indicate General Compliance, but VBA Has Not Assessed the Quality of Its Research Performed at the National Personnel Records Center

VA’s internal assessments indicate that regional offices generally comply with the requirements of the Veterans Claims Assistance Act for obtaining veterans’ military service records. However, VBA does not have a system for assessing the reliability and accuracy of research done on behalf of regional offices by a VBA unit located at the National Personnel Records Center, where the service records of many veterans are stored. The VBA quality review unit that evaluates the accuracy of regional office decisions on compensation claims has found that less than 4 percent of these decisions contain errors involving regional offices’ failing to obtain military service records as required by law. Similarly, of all the compensation appeals cases decided by the Board of Veterans’ Appeals during November 2004–January 2006, the board remanded less than 3 percent of these cases to VBA for rework due to deficiencies in obtaining military service records. However, because VBA does not systematically evaluate the quality of the research done on behalf of regional offices by the VBA unit at the National Personnel Records Center, VBA does not know the extent to which the information that this unit provides to regional offices is reliable and accurate.

¹Additional work required in remand orders can also include (1) arranging for a medical examination or obtaining a medical opinion if needed to make a proper decision, (2) providing veterans with all notices required by VCAA to inform them of evidence needed to support their claims, and (3) providing proper due process.

²While VCAA established requirements for VA in assisting veterans to obtain relevant records, it did not establish any requirements regarding the timeliness of VBA’s efforts to obtain such records.

VBA Quality Reviews
Show Regional Offices
Generally Comply with
Veterans Claims
Assistance Act
Requirements for
Obtaining Military Service
Records

VBA maintains a quality review program known as the Systematic Technical Accuracy Review (STAR) program. VBA selects random samples of each regional office's compensation decisions and assesses the regional office's accuracy in processing and deciding such cases. For each decision, the STAR quality review unit reviews the documentation contained in the regional office's claim file to determine, among other things, whether the regional office complied with claims assistance act duty-to-assist requirements for obtaining relevant records, made correct service connection determinations for each claimed condition, and made correct disability rating evaluations for each condition determined to be service connected. An error in any of these decision elements has the potential to result in a different decision outcome. One of VBA's fiscal year 2007 performance goals is that 88 percent of compensation decisions should contain no errors that could affect decision outcomes, and the long-term strategic goal is 98 percent.

STAR data from reviews of regional office decisions made during the first half of fiscal year 2006 showed that less than 4 percent of the cases reviewed contained any type of error related to the law's requirements for developing evidence.³ Because military service records are only one component in the overall body of evidence that regional offices must develop, the percentage of cases with errors related to military service records would be even smaller than the 4 percent error rate. While the STAR database does not capture statistical data on specific types of errors in evidence development, it does contain quality reviewers' narrative comments on the nature of errors found. A VBA analysis of these narrative comments showed that over half of all evidence development errors were due to regional offices not obtaining VA medical examinations or opinions when needed and using inadequate medical examinations. Thus, on the basis of STAR data, one would conclude that errors related to military service records account for less than half—or about 2 percent—of all evidence development errors.

³See appendix I for discussion of the statistical reliability of STAR data.

Decisions of Board of Veterans' Appeals Show Regional Offices Generally Comply with Claims Assistance Act Requirements for Obtaining Military Service Records

Since November 2004, when the Board of Veterans' Appeals began tracking whether remands are the fault of regional offices, it has remanded relatively few cases—less than 3 percent—because of regional office deficiencies in obtaining military records.⁴ For example, as of January 2006, the board had made decisions on 41,517 compensation cases and had remanded at least one issue in 44 percent of these cases (see table 1).⁵ However, of the 41,517 cases, 25.6 percent contained issues that had been remanded for reasons considered to be the fault of the regional office, and only 2.8 percent contained issues remanded specifically because of deficiencies in obtaining military service records.

Table 1: Decisions of Board of Veterans' Appeals on Compensation Cases, November 2004–January 2006

Type of board decision	Number of cases	Percentage of total cases
Board decided compensation case	41,517	100.0
Board remanded at least one compensation issue in a case	18,287	44.0
Board remanded at least one issue in a case because regional office failed to meet requirements of law or regulations	10,609	25.6
Board remanded at least one issue in case because regional office failed to meet VCAA requirements for obtaining military service records	1,147	2.8

Source: Board of Veterans' Appeals.

⁴To track the outcome of contested issues, VA uses a system known as the Veterans Appeals Control and Locator System (VACOLS), which contains data identifying the reason(s) each contested issue was remanded to VBA and whether the need to remand the issue was the fault of the regional office. The board would consider the remand to be the fault of the regional office if, for example, the regional office had failed to make initial or follow-up attempts to obtain relevant records as required by VCAA. However, if the board remanded a case because a change in law occurred after the regional office had sent the veteran's appeal to the board and additional work was needed to comply with the new law, the board would not consider the remand to be the fault of the regional office.

⁵The board routinely reports the percentage of cases that it allowed, denied, and remanded. To compute the percentage of cases remanded versus those allowed, the board classifies cases as remands using a method that does not necessarily reflect all cases in which at least one issue is remanded. Under the board's system, if the board allows any issue or part of an appealed case, the board counts the entire case as an allowance, regardless of whether the board remanded any other issue in the case.

For each case decided by the appeals board, it also tracks the outcome of each contested issue in the case—for example, a veteran may have contested the denial of service connection for a specific medical condition and also may have asked for a higher disability rating on another condition for which the regional office granted service connection. The 41,517 compensation cases decided by the board contained a total of 88,156 contested issues, of which 39 percent (34,351) were remanded to VBA. However, of the total contested issues, 23 percent (20,191) were remanded for reasons considered to be the fault of the regional offices.

For the 20,191 issues remanded because of regional office deficiencies, the board identified a total of 36,812 reasons for remanding these issues (see table 2). Of these remand reasons, only 7.6 percent were related to inadequacies in obtaining military service records (service medical records, 3.5 percent; service personnel records, 2.4 percent; and military unit historical records, 1.6 percent). The predominant reasons for remands were deficiencies in obtaining medical examinations or opinions and nonmilitary records and in providing proper due process.

Table 2: Remand Reasons for 20,191 Issues That the Board Remanded Due to Regional Office Deficiencies, November 2004–January 2006

Remand reasons	Total reasons	Percentage of total
Board remanded issue because regional office failed to meet requirements for:		
• Providing proper notification	4,325	11.7
• Providing proper due process	7,456	20.3
• Obtaining medical exam or medical opinion	13,356	36.3
• Obtaining nonmilitary records	8,884	24.1
• Obtaining military service records	2,791	7.6
• Service medical records	1,305	3.5
• Service personnel records	894	2.4
• Military unit historical records	592	1.6
Total	36,812	100

Source: Board of Veterans' Appeals.

Focusing only on issues in which veterans asked the appeals board to grant service connection for a medical condition that the regional office had denied, the board identified about 12 percent of the reasons for remanding service connection issues as being related to inadequacies in obtaining military service records.

VBA Lacks Systematic Quality Review of Research Performed by the VBA Unit Located at the National Personnel Records Center

To obtain service records stored at the National Personnel Records Center, regional offices submit requests to a VBA unit located at the center, asking the VBA unit to provide copies of service records and/or provide information contained in the records. This unit responded to such requests from regional offices for about 290,000 cases in calendar year 2005. For certain types of compensations claims, such as herbicide exposure and PTSD claims, VBA's written procedures instruct regional offices not to request a copy of the veteran's entire service personnel record, which can be voluminous. Instead, regional offices are supposed to rely on the VBA unit at the National Personnel Records Center to obtain the veteran's files, perform a physical search of the files for relevant records, provide copies of only certain specified records, analyze certain types of records, and provide regional offices with narrative answers on the results of their research and analyses. Thus, regional offices rely on the VBA unit at the National Personnel Records Center to do thorough and complete searches of records, do reliable analyses of records, and provide accurate and clear narrative reports on the results.

VBA, however, does not have a systematic quality review program that evaluates the accuracy of the work that the VBA unit at the National Personnel Records Center performs on behalf of the regional offices. Such a program is needed as part of an adequate system of internal management controls for VBA's administration of the compensation program. An example of why the records research done by VBA employees at the National Personnel Records Center must be reliable is provided by disability claims based on exposure to herbicides in Vietnam. Under the Agent Orange Act of 1991, VA presumes that any veteran who had set foot on land in the Republic of Vietnam at any time during the Vietnam era (January 9, 1962, to May 7, 1975) was exposed to herbicides such as Agent Orange.⁶ If any such veteran files a claim for certain specified diseases that have been determined to be attributable to herbicide exposure, VA must presumptively grant service connection to the veteran for such diseases. If a veteran claims that he or she was officially stationed on land in Vietnam during that period, the VBA unit at the National Personnel Records Center should be able to verify this fact by examining standard personnel forms in his or her service personnel file. However, if a veteran who was not

⁶In August 2006, the U.S Court of Appeals for Veterans Claims ruled that veterans who served in the waters off Vietnam during January 9, 1962, to May 7, 1975, are entitled to disability benefits on the basis of presumption of service connection for diseases related to exposure to herbicides such as Agent Orange, regardless of whether they ever actually set foot on land in Vietnam. See *Haas v. Nicholson*, 20 Vet. App. 257 (Aug. 16, 2006).

officially stationed on land in Vietnam claims that on some occasion he or she did set foot on land in Vietnam during that period, VBA may encounter more difficulty obtaining the evidence needed to verify the veteran's claim because standard personnel forms would not document such occasions.

In such cases, VBA procedures instruct regional offices not to ask for the veteran's entire service personnel file, but instead, the regional office must ask the VBA unit at the National Personnel Records Center to search the veteran's personnel file for any evidence that might corroborate his or her claim of having set foot on land in Vietnam. One regional office that we visited provided an example of how the VBA unit at the National Personnel Records Center could overlook corroborating evidence contained in the file and cause a significant delay of benefits for a veteran. In this particular case, an Air Force veteran claimed that he had been assigned to an aircraft that had landed and spent a short time on the ground in Vietnam during the presumptive period. The VBA unit at the National Personnel Records Center did not provide the regional office with evidence supporting this claim, and the regional office ultimately denied the claim. However, the veteran appealed the decision to the Board of Veterans' Appeals, which remanded the case to the regional office and ordered the regional office to obtain and review the veteran's entire personnel file. After obtaining the entire file from the National Personnel Records Center, the regional office found documents in the file that provided sufficient evidence to conclude that the veteran's claim was credible. If the VBA unit at the National Personnel Records Center had found and reported this evidence to the regional office during the initial claims process, the veteran's claim could have been granted without his having to go through the appeals process.

Also, for many PTSD claims, regional offices potentially must rely on the VBA unit at the National Personnel Records Center to do thorough research of personnel records. PTSD results from personal exposure to traumatic events (stressors) that can occur during combat events; noncombat events—such as plane crashes, ships sinking, explosions, burn ward duty, or graves registration duty—and personal assault. For such claims, if evidence substantiates that a veteran engaged in a combat event, the veteran's own testimony is sufficient to substantiate the occurrence of a claimed stressor associated with that event. If engagement in combat is not substantiated, then the regional office must seek other evidence substantiating the occurrence of the stressor claimed by the veteran.

Only for PTSD claims involving personal assault do VBA's procedures instruct regional offices to request a copy of the entire personnel file from

the National Personnel Records Center. Routinely requesting the entire file for personal assault cases is permitted because such cases can involve personal and sensitive incidents that sometimes are not officially reported. Therefore, the entire file needs to be examined for indications of changes in behavior or performance that may have been related to the alleged rape or assault. For all other types of PTSD stressors claimed by veterans, the documents that regional offices may routinely request from the veterans' service personnel files do not include performance reports or written justifications for awards and commendations. According to regional office officials, however, these documents sometimes can contain evidence that supports a veteran's PTSD claim. As a result, the regional offices depend on the VBA employees stationed at the National Personnel Records Center to read such documents and report any supporting evidence to the regional office.

Officials of VBA's Records Management Center—which oversees the work of the VBA unit at the National Personnel Records Center—informed us they are considering implementing a systematic program for reviewing the quality of all types of research work performed by this unit. Although a quality review function is already in place, only one analyst has been responsible for reviewing a 3 percent random sample of each employee's work products. Given the volume of work products and limited time because of other duties, the analyst told us he examined few actual service record files to assess the accuracy of the work done by the employees. Instead, the analyst had resorted to using professional judgment to assess whether the content of the responses that employees provided to regional offices appeared reasonable in light of the nature of the request to which they were responding. Only if the analyst thought the response content looked questionable did he actually obtain the service record files and examine the records to determine the accuracy of the response. For example, the analyst told us that in a recent month he had reviewed actual service record files for only 17 of the approximately 700 responses randomly selected for review.

According to officials of the VA Records Management Center, they are considering establishing a team of three or four full-time quality review specialists that would report to the director of the VA Records Management Center. If implemented, this team would review the quality of work done by VBA employees at the National Personnel Records Center and at the VA Records Management Center. The team would continue to randomly select a 3 percent sample of each employee's completed work products prepared in response to regional office requests. However, unlike the current review, to determine accuracy, the new team would be able to

review the actual service record files for all responses selected for review. A quality review specialist position description has been developed, but at the time of our review, implementation milestones for the new system had not been established.

Potential Improvements in Procedures Could Reduce Time Required to Process PTSD Claims of Some Veterans

VBA potentially could improve its procedures and reduce the time required to process some veterans' PTSD claims. During fiscal years 1999-2004, the number of veterans receiving compensation benefits because of PTSD increased by about 80 percent, from about 120,000 to almost 216,000.⁷ VBA potentially could improve its procedures to reduce the time required to process some veterans' PTSD claims. To verify the occurrence of claimed stressors, regional offices sometimes cannot find needed evidence in the veteran's personal service records and must turn to information contained in the military historical records of DOD. While regional offices are able to directly access and search an electronic library of such records for many Marine Corps veterans, they must rely on a DOD research organization—the U.S. Army and Joint Services Records Research Center (JSRRC)—to research such records for all other service branches.⁸ JSRRC's average response time to regional office requests for such research approaches 1 year; by contrast, VBA's average processing time strategic goal for claims involving disability compensation issues is 125 days. The opportunity may exist for VBA to establish an electronic library of DOD military historical records for the other service branches and greatly reduce the time required to process the PTSD claims of many veterans.

According to VBA's procedures, if the regional office verifies that a PTSD claimant engaged in combat or was a prisoner of war, the claimant's own personal testimony is sufficient evidence to verify the occurrence of a stressor associated with the combat or the prisoner-of-war experience. Otherwise, the regional office must obtain other credible evidence to

⁷By contrast, during that period, the total number of veterans receiving disability compensation grew by about 12 percent.

⁸In rape and personal assault cases, because many incidents of personal trauma are not officially reported, the regional office may need to seek evidence from other sources, such as military law enforcement, rape crisis center, center for domestic abuse, counseling facility, health clinic, family members or roommates, faculty member, civilian police reports, medical reports of civilian physicians or caregivers who may have treated the veteran immediately or sometime after the incident, chaplain or clergy, fellow service persons, and personal diaries or journals.

verify the claimed stressor. For Marine Corps veterans from the Vietnam era and the Korean conflict, the regional office can electronically view and search a set of compact discs provided by the Marine Corps University Archives. These discs contain Marine Corps historical records for the Vietnam era (1960-1975) and the Korean conflict. Officials of regional offices we visited estimated that, on average, they can perform these electronic searches of Marine Corps records in less than a day. If the regional office cannot find the needed corroborative evidence on the compact disks, the regional office must ask the Marine Corps University Archives to search its records for any evidence corroborating the veteran's claim, and only if the Marine Corps University Archives cannot find corroboration may the regional office deny the veteran's PTSD claim.

By contrast, for veterans of armed service branches other than the Marine Corps, DOD has not created an electronic historical library of records that regional offices can search when the veteran's service medical or personnel records do not provide evidence to verify engagement in combat or to verify the claimed stressor. Instead, VBA's procedures call for regional offices to ask JSRRC to conduct research of military historical records of the units in which veterans served in order to provide the needed corroboration.⁹ Many of the records that JSRRC may search are voluminous, are not stored electronically, and must be searched manually (see app. V for information on such records). After conducting its research, JSRRC provides the regional office a summary of its findings but does not evaluate evidence, render opinions, make conclusions, or decide the merits of a claim. According to its Director, the center has 13 full-time-equivalent employees and a steady backlog of about 4,000 cases, of which about 85 percent come from VBA regional offices; the remaining requests are submitted by individual veterans and veterans service organizations.

In our visit to VBA's Oakland regional office, we learned that the regional office recently had begun a local initiative in which the regional office had designated three employees who—when other decision-making duties permit—search an electronic library of unclassified historical military records compiled by the Chicago regional office's military records

⁹If adequate evidence of engagement in combat cannot be obtained from primary sources such as the veteran's service records, the Marine Corps University Archives, or the JSRRC, the regional office may also use secondary sources of evidence such as buddy statements, veteran's military occupational specialty, contemporaneous letters and diaries, newspaper archives, and military or government Web sites approved by VBA (see listing of Web sites in app. IV).

specialist. According to the Chicago regional office's military records specialist, several other regional offices also have been provided this electronic library. The Oakland regional office employees doing this research and the Chicago regional office military records specialist stated that they have been able to find sufficient evidence in the electronic library to grant service connection for a substantial portion of PTSD cases that otherwise would have required that the regional office ask the JSRRC to search for evidence corroborating the veteran's claim. According to these officials, they can complete these searches within a few weeks after being asked to do the search. These regional offices now request searches by JSRRC for PTSD cases only if sufficient evidence cannot be found in the electronic library to grant service connection. The Director of JSRRC told us that such research by regional offices could greatly reduce JSRRC's backlog of research requests and reduce the average response time, assuming JSRRC's staffing level remained constant.

A related issue is that some veterans may not be willing to disclose to regional offices certain details needed to process their PTSD claims because the claimed stressful event occurred during classified operations. For example, to alleviate the possibility of such reluctance on the part of hundreds of thousands of veterans who had participated in classified atmospheric atomic testing and possibly been exposed to nuclear radiation, the Secretary of Defense issued a memorandum in 1996 authorizing such veterans to divulge to VA the name and location of their command, duties performed, dates of service, and related information necessary to validate exposure to nuclear radiation. Similarly, in PTSD cases for which regional offices cannot find sufficient evidence in veterans' service records to grant the claims, if the veterans, because of concerns about classified operation, will not provide the regional office with certain minimum details, the regional office will not be able to submit requests to JSRRC to search military historical records for corroborating evidence. We discussed the classified operations issue with the Director of JSRRC, who stated that he personally had talked with veterans who had directly contacted his organization and who maintained they could not divulge to him the details of their participation in classified operations. He said that after he explained to them that the entire JSRRC staff are DOD employees and have appropriate security clearances, the veterans were willing to provide him with the details needed to conduct searches of DOD records, including any pertinent classified records maintained by DOD. While the extent of the classified problem is unknown, the Director had no objections to regional offices advising veterans to directly contact JSRRC if they are unwilling to disclose sufficient details to the regional office to

process their claims because their disabilities allegedly were incurred during classified operations.

Conclusions

VA is responsible for providing reasonable assurance that it is complying with applicable laws and regulations. While VA's internal assessments indicate that its regional offices generally comply with the requirements of the Veterans Claims Assistance Act for obtaining military service records, VA does not have a systematic quality review program for ensuring the reliability and accuracy of records research done on behalf of regional offices by the VBA unit located at the National Personnel Records Center. As a result, VA cannot reasonably ensure the quality of the research on which regional offices rely to assist many veterans in obtaining service records relevant to their compensation claims.

PTSD claims have been a growing portion of the claims processed by regional offices. Many present challenges in obtaining the evidence needed to process them, resulting in veterans having to wait for long periods for their claims to be decided. VBA's establishment of a claims-processing timeliness performance goal demonstrates that high-quality service should result not only in correct decisions, but also decisions rendered in a reasonable length of time. The experience of several regional offices suggests that VBA could improve its timeliness in deciding the PTSD claims of many veterans nationwide if VBA systematically utilized an electronic library of historical military records such as the one compiled by the Chicago regional office. The average time for the Joint Services Records Research Center to respond to such requests is about 1 year; by contrast, officials in some regional offices have found that using the online library compiled by the Chicago regional office enabled them to find sufficient evidence in a matter a few weeks to grant the PTSD claims of many veterans.

Recommendations for Executive Action

We recommend that the Secretary of the Department of Veterans Affairs direct the Under Secretary for Benefits to take the following actions.

- To adequately ensure the quality of the records research done on behalf of regional offices by the VBA unit at the National Personnel Records Center, VBA should move forward in implementing a systematic quality review program that evaluates and measures the accuracy of the unit's responses to all types of regional office research requests.

-
- To improve its timeliness in deciding PTSD claims, VBA should assess whether it could systematically utilize an electronic library of historical military records, such as the one compiled by the Chicago regional office, to identify veterans whose PTSD claims can be granted on the basis of information contained in such a library, rather than submitting all research requests to the Joint Services Records Research Center.

Agency Comments and Our Response

In its written comments on a draft of this report (see app. VI), VA agreed with our findings and concurred with our recommendations. VA stated it had increased the number of VBA quality reviewers at the National Personnel Records Center in order to better ensure the quality of responses provided to regional offices. VA also noted that VBA will determine the feasibility of regional offices' using other databases to research cases in order to reduce the number of cases sent to the JSRRC. We believe these are positive steps toward ensuring the quality of the records research done by the VBA unit at the National Personnel Records Center and improving timeliness.

As agreed with your office, unless you publicly announce it contents earlier, we plan no further distribution until 30 days after the date of this report. At that time, we will send copies of this report to the Secretary of Veterans Affairs, appropriate congressional committees, and other interested parties. The report will also be available at GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions regarding this report, please call me at (202) 512-7215. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Other contacts and staff acknowledgments are listed in appendix VI.



Robert E. Robertson
Director, Education, Workforce,
and Income Security Issues

Appendix I: Scope and Methodology

To identify Veterans Benefits Administration (VBA) procedures for obtaining relevant military service records, we obtained and analyzed Department of Veterans Affairs (VA) regulations governing the processing of compensation claims; VBA's written procedures, user guide for the automated system for requesting military records, training materials, and other VBA instructions for directing regional offices' efforts in obtaining military records; locally written procedures and guides developed by regional offices to direct their employees in obtaining military records; and information electronically available to regional offices through VBA's internal network.

To gain an operational context for the information obtained from these sources and to obtain stakeholders' views on the effectiveness of VBA's procedures for obtaining relevant military service records, we interviewed officials of VA's Board of Veterans' Appeals and Office of Inspector General; VBA's Compensation and Pension Service, Office of Field Operations, Appeals Management Center, Records Management Center, VA Liaison Office at the National Personnel Records Center, and regional offices located in Atlanta, Georgia, Baltimore, Maryland, Oakland, California, and St. Petersburg, Florida; custodians of military records and organizations that research military records on behalf of VBA's regional offices, including Department of Defense (DOD) U.S. Army and Joint Services Records Research Center, Defense Threat Reduction Agency, DOD Joint Requirements and Integration Office, and National Personnel Records Center, which is operated by the National Archives and Records Administration; and veterans' advocacy groups, including Disabled American Veterans, American Legion, Veterans of Foreign Wars, Paralyzed Veterans of America, AMVETS, National Veterans Legal Services Program, and state and county veterans service agencies.

As part of our review of the results of VA's internal assessments of regional offices' compliance with Veterans Claims Assistance Act requirements for obtaining military service records, we assessed the reliability of fiscal year 2006 data compiled by VBA from its Systematic Technical Accuracy Review (STAR) program for regional office decisions involving compensation issues. In earlier GAO work on STAR data reported for fiscal year 2004, we reported that regional offices had failed to send any case files to the STAR unit for hundreds of cases randomly selected for quality review, which meant the possibility existed that if the STAR unit had actually been able to review the files for these cases, the

accuracy scores for some individual regional offices could have been lower than those reported for fiscal year 2004.¹ Subsequently, the STAR unit began tracking the receipt of cases randomly selected for review. For our current work, we followed up with the STAR unit to determine the extent to which regional offices now send to the STAR unit all cases selected for quality review. We obtained data from the STAR unit and concluded that the numbers of cases requested, received, and reviewed for the first half of fiscal year 2006 provided nationwide data that were sufficiently reliable for our reporting purposes. Even so, the STAR unit did not receive about 6 percent of the cases selected for review during the first half of fiscal year 2006; therefore, because the STAR unit might have found additional VCAA development errors if it had had the opportunity to review these cases, the percentage of cases actually containing Veterans Claims Assistance Act (VCAA) development errors may have been larger than indicated by the fiscal year 2006 data reported by the STAR unit.

Also, as part of our review of VA's internal assessments of regional offices' compliance with VCAA requirements for obtaining military service records, we assessed the reliability of data recorded in the Veterans Appeals Control and Locator System (VACOLS) by the Board of Veterans' Appeals on the results of its reviews of veterans' appeals on compensation decisions made by regional offices. We obtained data as of January 31, 2006, on all compensation cases decided by the board since November 1, 2004, when the board began recording in VACOLS whether its remands of decisions to VBA for rework were due to regional office deficiencies. To assess the reliability of the VACOLS data, we interviewed knowledgeable board officials, performed electronic testing of pertinent VACOLS data elements, and reviewed existing information about the data and the system that produced them. We determined that the data were sufficiently reliable for the purposes of this report. We analyzed these data to create summary statistics on the disposition of compensation cases and issues decided by the board.

¹GAO, *Veterans' Benefits: Further Changes in VBA's Field Office Structure Could Help Improve Disability Claims Processing*, [GAO-06-149](#) (Washington, D.C.: Dec. 9, 2005).

Appendix II: Overview of Military Service Records

VBA's regional offices face a complex task in obtaining veterans' military service records because (1) service records consist of numerous types of records that can originate from numerous sources within or outside DOD, (2) the process for collecting and storing service records has varied substantially for different groups of veterans over time, (3) service records cannot always be found at the expected storage locations, and (4) the service records of many veterans were destroyed by a fire in 1973 at the National Personnel Records Center, a primary repository for service personnel and medical records.

Service Records Are Numerous and Can Originate from Numerous Sources

The cumulative service medical records and service personnel records of individual service members contain numerous types of records that can originate in varying organizations and geographic locations of DOD's activities as service members migrate from assignment to assignment during their military service (see table 3).

Table 3: Military Service Records of Individual Veterans

Category	Type of record
Medical records	<ul style="list-style-type: none">• Physical examination reports, including entrance and discharge exam reports• Medical history• Dental examinations and records• Inpatient clinical record cover sheets and summaries• Entries from outpatient medical and dental treatments• Physical profiles• Medical Evaluation Board proceedings in DOD's disability evaluation process• Prescriptions for eyeglasses• Prescriptions for orthopedic footwear
Personnel records	<ul style="list-style-type: none">• Entry• Training• Education• Performance• Discipline• Decorations and awards• Assignments• Duties• Casualty status• Separation or retirement from the military• Certain health records (usually limited to entrance/separation physical exam reports but may include physical profiles and medical evaluation board proceedings)

Source: VA.

Process for Collecting and Storing Service Records Varies Substantially for Different Groups of Veterans

Historically, when service members separated from active duty, all DOD service branches forwarded all service medical records and service personnel records to the National Personnel Records Center in St. Louis, Missouri. However, beginning in the early 1990s, separation point military installations began sending service medical records to VA's Records Management Center, also located in St. Louis. The timing of this changeover varied among service branches, but as of May 1998, all branches had begun sending service medical records to the VA Records Management Center for service members who are discharged from active duty and have no remaining military reserve or National Guard obligation

(see table 4, col. 2).¹ Also, in 1996, the Navy became the first DOD service branch to store service personnel records electronically in optically imaged files, which permitted the Navy to discontinue sending these records to the National Personnel Records Center. As of November 2005, all DOD service branches were storing service personnel records electronically and had discontinued sending such records to the National Personnel Records Center (see table 4, col. 3).

¹The Coast Guard began sending service medical records to the VA Records Management Center in May 1998.

Table 4: Dates When Service Branches Changed the Storage Disposition of Service Medical Records and Service Personnel Records

(1) Service branch	(2) Date when service branch began sending service medical records to the VA Records Management Center rather than to the National Personnel Records Center ^a	(3) Active duty release date of veterans for whom service branch stores service personnel records electronically as optically imaged files ^b
Army	October 16, 1992	October 1, 2002
Navy	January 31, 1994	January 1, 1996
Air Force	May 1, 1994 (active duty only) June 1, 1994(reserves/National Guard)	November 2005
Marine Corps	May 1, 1994	January 1, 1998

Source: VA and DOD.

^aAlthough the service medical records sent to the VA Records Management Center include military inpatient clinical record cover sheets and summaries, these records do not include detailed clinical records, such as daily treatment records and nurses' notes. Military medical facilities maintain these detailed clinical records until a preset period of inactivity has elapsed and then forward such records directly to the National Personnel Records Center. Civilian medical facilities that treat active duty service members do not forward any medical or mental health records for storage and destroy such records after a period of inactivity.

^bEach service branch also electronically stores service personnel records as optically imaged files for veterans who were released from active duty before the date in column 3 but whose reserve obligations did not expire until after this date.

When service members have military reserve or National Guard obligations remaining at the time of their release from active duty, the service branches may not route their service records in the same way that they route the records of those who do not have such an obligation when released from active duty. For service members who still have reserve or guard obligations at the time of their release, the disposition of their service records varies depending on their service branch, whether their obligation is a reserve versus guard obligation, and whether or not they are assigned to an active unit at the time of release from active duty.

VA and DOD jointly initiated a Benefits Delivery at Discharge program that enables service members still on active duty to file disability compensation claims within 6 months before separating from active military duty. Under this program, VBA arranges for a physical examination of the claimant, and the service branch provides a VBA liaison with a copy of the claimant's service medical records. The liaison sends these records to one of the two VBA regional offices (Winston-Salem and Salt Lake City) that process all claims filed under this program. The regional office prepares a

rating decision prior to the claimant's discharge from active duty, and after the claimant's discharge, the service branch sends the regional office a copy of the claimant's DD Form 214 (Report of Release from Active Military Service), and the regional office immediately authorizes benefits. As of April 2005, 141 military installations worldwide were participating in the Benefits Delivery at Discharge program, and in fiscal year 2004, and VBA processed 39,000 claims under this program. Additionally, if a service member not participating in this program submits a VA disability claim form to his or her service branch before separating from active duty, the service branch retains the claim form until the individual separates from active duty and then forwards his or her claim form, DD Form 214, and service medical records to the regional office having jurisdiction over the individual's permanent address.

Veterans' Service Records Cannot Always Be Found at Expected Storage Locations

To request veterans' service records, regional offices rely primarily on a VBA system known as the Personnel Information Exchange System (PIES). This system provides regional offices with a menu of record request codes, each of which is defined in terms of the types of service records and/or information being requested by the regional office. On behalf of the regional offices that input such requests into the PIES system, the VA Records Management Center prints and mails requests to custodians of records maintained in paper form, and the PIES system electronically routes requests to custodians of service personnel records maintained in optically imaged files. However, for a variety of reasons, the custodians whom regional offices expect to be in possession of requested records cannot always provide the records (see fig. 1).

Figure 1: Reasons Regional Offices Cannot Always Find Service Records at Expected Locations

- Military hospitals sometimes do not forward inpatient clinical record cover sheets and summaries to the veteran's separation point installation.
- The last ship to which a Navy veteran was assigned may fail to forward medical records to the veteran's separation point installation.
- Separation point installations may not forward the veteran's records or may forward them to the wrong location, such as sending service medical records to the National Personnel Records Center rather than to the VA Records Management Center.
- Service records sometimes are in the possession of the veteran.
- When veterans' reserve or guard obligations expire, their units sometimes fail to forward their records to the appropriate location.

Source: VA.

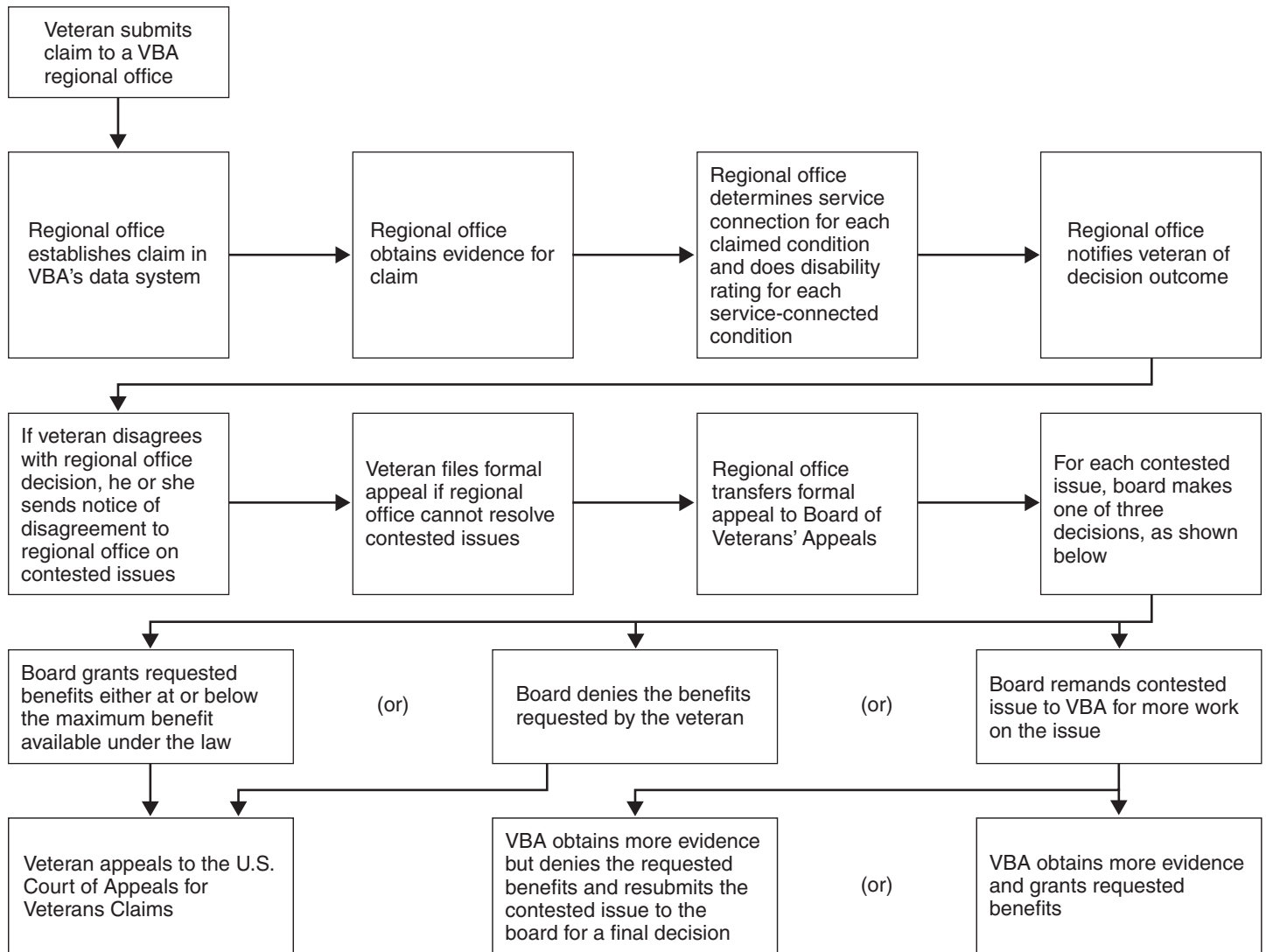
Fire in 1973 Destroyed the Military Service Records of Many Veterans

The service records of many older veterans were destroyed by a fire in 1973 at the National Personnel Records Center. The fire destroyed the records of approximately 80 percent (16 million to 18 million) of the Army veterans who served during November 1912 through January 1, 1960, and the records of 75 percent of the Air Force veterans with surnames Hubbard through Z who were discharged between September 25, 1947, and January 1, 1964, and were not in a retired or reserve status at the time of the fire. For some of these veterans, the National Personnel Records Center has resources that can help reconstruct some of their service medical information. For example, the center has Army morning (sick) reports for November 1912 to December 1974 and Air Force morning reports for September 1947 to June 1966. Also, in 1988, the National Personnel Records Center obtained magnetic tapes containing limited information extracted by the Surgeon General's Office from about 10 million hospital admission records for veterans admitted to military hospitals during 1942-1945 and 1950-1954.

Another alternative is for VA to ask the veteran's service branch to search sick logs, morning reports, and records of military organizations, hospitals, and infirmaries. Other alternative sources for medical information can include statements from service medical personnel; buddy certificates or affidavits; state or local police accident reports; employment physical examinations; medical evidence from hospitals, clinics, and private physicians that may have treated the veteran during or soon after

separation; letters written by the veteran during service; photographs taken during service; pharmacy prescription records; and insurance examinations.

Appendix III: VA's Disability Compensation Claims and Appeals Process



Source: Prepared by GAO using information from VBA and the Board of Veterans' Appeals.

Appendix IV: Web Sites Listed in the PTSD Rating Job Aids Section of VBA's Internal Network

Table 5: Web Sites Listed in the PTSD Rating Job Aids Section of VBA's Internal Network

U.S. Air Force	Site
Air Force Historical Research Agency	http://www.au.af.mil/au/afhra/
Air Force Historical Studies Office	https://www.airforcehistory.hq.af.mil/
U.S. Army	
Korean War history page	http://korea50.army.mil/history/factsheets/index.shtml
1st Infantry Division Web site	http://www.1id.army.mil/
Center of Military History	http://www.army.mil/cmh-pg/default.htm
Army Engineers Vietnam Studies, 1965-1970	http://www.army.mil/cmh-pg/books/Vietnam/Engineers/index.htm
Human Resources Command, Military Awards Branch	https://www.hrc.army.mil/indexflash.asp
Military History Institute, Army War College, Carlisle Barracks, MHI Digital Library Chronological List	http://carlisle-www.army.mil/usamhi/ http://carlisle-www.army.mil/usamhi/dl/chron.htm
Unit Citation and Campaign Participation Credit Register (January 1960-September 1987)	Regional offices can access an electronic copy of Army Pamphlet 672-3 stored on VBA's internal network.
U.S. Coast Guard	
Coast Guard Historian's Office	http://www.uscg.mil/hq/g-cp/history/collect.html
Coast Guard Web site	http://www.uscg.mil/USCG.shtm
U.S. Marine Corps	
Database Search for Combat Action Ribbon	https://lnweb1.manpower.usmc.mil/manpower/mm/mmma/AwardsVerification.nsf/search
History and Museums Division	http://hqinet001.hqmc.usmc.mil/HD/Home_Page.htm
Marines Web site	http://www.usmc.mil/marinelink/mcn2000.nsf/frontpagenews
U.S. Navy	
Navy, Naval Historical Center	http://www.history.navy.mil/
Navy Hospital Corps and Dental Technician History Page	http://navymedicine.med.navy.mil/bumed/index.cfm?docid=10324
Navy Service and Campaign Medals	http://www.history.navy.mil/medals/index.html
Navy Web site	http://www.navy.mil/
Department of Defense	
Office of the Special Assistant for Gulf War Illness, Gulfink	http://www.gulfink.osd.mil/
Official U.S. Military Casualty Information	http://www.dior.whs.mil/mmid/casualty/castoptest.htm
POW/Missing Personnel Office	http://www.dtic.mil/dpmo/

**Appendix IV: Web Sites Listed in the PTSD
Rating Job Aids Section of VBA's Internal
Network**

Other	Site
Dictionary of American Naval Fighting Ships, DANFS Online	http://www.hazegray.org/danfs/
John C. Thorn, Links to Military Web Sites	http://www.thorn.pair.com/thorn/links/military.html
National Archives, Online Veterans and Military Documents	http://www.archives.gov/veterans/research/online.html
National Center for PTSD	http://www.ncptsd.va.gov/index.html
National Transportation Safety Board Aircraft Accidents	http://www.nts.gov/nts/query.asp
No-Quarter.Org, Vietnam Casualty Search Page	http://www.no-quarter.org/
VBA Denver Regional Office, Military Awards, Decorations, Campaigns	http://vbaw.vba.va.gov/ro/west/denvr/awards.htm
Vietnam Project/Virtual Vietnam Archive	http://www.vietnam.ttu.edu/vietnamarchive/index.htm

Source: VBA.

Note: In an introductory note regarding the Web sites listed above, the PTSD Rating Job Aids Section in VBA's internal network states that the information found at these Web sites—as well as any other government Web sites (.gov or .mil)—may be used to verify stressors and the claimant's involvement in the stressful event. The note also states that while many nongovernment Web sites may contain additional supporting documentation, information from those Web sites—including any links to nongovernment Web sites found within the approved sites listed above—cannot serve as the sole basis for verification.

Appendix V: Types of Records Researched by DOD's U.S. Army and Joint Services Records Research Center

Table 6: Types of Records Researched by DOD's Joint Services Records Research Center

Army	<p>Daily journals: These daily logs of a unit's activities record names, locations, times, and specific incidents and operations. These are the most useful records for verifying stressors, but because they are so voluminous, it is imperative that the regional office provide a specific date span, preferably 7 days or less.</p> <p>Operational reports—lessons learned: These are quarterly reports documenting a unit's major operations and activities and often include unit locations, strengths, operations and results of operations, casualties, statistical reports, and recommendations for improvement.</p> <p>Unit and organizational histories: These documents describe the general activities of Army units for a particular period of time—normally 6 months or 1 year. The quality of these histories varies greatly from unit to unit and may contain everything from extremely detailed descriptions of battles to changes in command and flag-raising ceremonies.</p> <p>Morning reports DA Form 1: Morning reports contain a daily accounting of personnel actions at the company level. More specifically, they list the transfer, arrival, and departure of individual service members. They also contain the name and status of service members wounded in action, killed in action, and missing in action. The Army ceased using morning reports in 1974.</p> <p>Casualty records: Casualty records contain information on the type of casualty, location, type of attack, cause and type of injury, and possible prognosis. They also contain the service member's unit, rank, military occupational specialty, date of casualty, date of report, name of individual making the report, witnesses, and place of treatment. These records are arranged alphabetically by last name. In order to research effectively, complete last names are required; complete last and first names are preferred. In order to identify the correct individual, service numbers and Social Security numbers may be required.</p>
Air Force	<p>Quarterly historical reports: Quarterly historical reports are divided into functional areas such as supply, aircraft maintenance, civil engineering, and personnel. Major units maintain these records. The information maintained is largely useless for the purpose of verifying specific stressful events. This makes it imperative that Air Force veterans provide detailed descriptions of their claimed stressors.</p> <p>Other records: Morning reports have not been maintained by the Air Force since 1964. The Air Force Military Personnel Center, Randolph Air Force Base, Texas, maintains Air Force casualty information. The Air Force does not publish combat after-action reports, daily journals, situation reports, or operations reports—lessons learned.</p>
Navy	<p>Deck logs and ship histories: Deck logs record all unusual or significant enemy action. The Officer of the Deck records the information at a minimum of once each 4 hours. Deck logs are the only ship logs sent to the Naval Historical Center for archiving. A deck log is a daily chronology of certain events specified in Office of the Chief of Naval Operations Instruction 3100.7 (OPNAVINST 3100.7). Deck logs are bulky, voluminous documents that track a ship's location and movements daily. In cases of deaths and injuries suffered on board, the log should contain the simple fact of the death or injury and note whether medical treatment was given, but it does not specify the treatment or contain reports on medical matters, such as sick bay visits or injuries not suffered on board ship.</p> <p>Navy shore station histories and ship histories – These documents are a compilation of significant events for the year.</p> <p>Mustering rolls - These rolls record assignments of individuals to and from ships and stations.</p> <p>Other records – The Navy Military Personnel Command maintains a centralized listing of all Navy combat casualties. Other Navy records include war diaries. The Navy does not publish combat after-action reports, daily journals, and situation reports of operations reports—lessons learned.</p>

Source: VBA.

Appendix VI: Comments from the Department of Veterans Affairs



THE SECRETARY OF VETERANS AFFAIRS
WASHINGTON

November 27, 2006

Mr. Robert E. Robertson
Director
Education, Workforce, and Income Security Issues
U. S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Robertson:

The Department of Veterans Affairs (VA) has reviewed your draft report, ***VETERANS' DISABILITY BENEFITS: VA Can Improve Its Procedures for Obtaining Military Service Records*** (GAO-07-98) and agrees with your findings and concurs with your recommendations. The enclosure details VA's actions to implement the Government Accountability Office's recommendations. VA is committed to providing accurate and expeditious claims processing for our Nation's veterans.

Thank you for the opportunity to comment on your draft report.

Sincerely yours,

A handwritten signature in black ink, appearing to read "R. James Nicholson".

R. James Nicholson

Enclosure

Enclosure

The Department of Veterans Affairs (VA) Comments to
The Government Accountability Office (GAO) Draft Report,
***VETERANS' DISABILITY BENEFITS: VA Can Improve Its Procedures for
Obtaining Military Service Records***
(GAO-07-98)

**GAO recommends that the Secretary of Veterans Affairs direct the
Under Secretary for Benefits to take the following actions:**

- **To adequately ensure the quality of the records research done on behalf of regional offices by the VBA unit at the National Personnel Records Center, VBA should move forward in implementing a systematic quality review program that evaluates and measures the accuracy of the unit's responses to all types of regional office research requests.**

Concur – The Veterans Benefits Administration (VBA) unit at the National Personnel Records Center (NPRC) has had a systematic quality review program in place since October 1, 2005. To strengthen the review process, the Director, VBA's Records Management Center (RMC) increased the number of quality reviewers to two employees.

Additionally, in December 2006, the VBA unit at the NPRC will strengthen quality reviews further by reviewing work daily. Cases selected for review will be taken from completed work staging areas from each caseworker. Cases selected for review involving record responses with documentation ready to be mailed to VA regional offices (VARO) will be reviewed and compared with the service record to determine the accuracy of the response. The review will occur prior to release of the documentation to the VARO. The quality team will also monitor computer generated responses (e.g. requests for verified service) daily. The quality reviewers will review five percent of monthly completed work.

- **To improve its timeliness in deciding PTSD claims, VBA should assess whether it could systematically utilize an electronic library of historical military records, such as the one compiled by the Chicago regional office, to identify veterans whose PTSD claims can be granted on the basis of information contained in such a library, rather than submitting all research requests to the Joint Services Records Research Center.**

Concur – VBA's Compensation and Pension Service (C&P) maintains a Web site dedicated to providing the same type of information that VARO Chicago compiles. This Web site provides links to other Web sites with information that may be used to verify stressors for post traumatic stress disorder (PTSD).

Enclosure

The Department of Veterans Affairs (VA) Comments to
The Government Accountability Office (GAO) Draft Report,
***VETERANS' DISABILITY BENEFITS: VA Can Improve Its Procedures for
Obtaining Military Service Records***
(GAO-07-98)
(Continued)

However, C&P has limited the Web sites listed to those that have been scrutinized for their reliability.

Existing VBA policy outlined in VBA Adjudication Procedures Manual M21-1MR IV.ii.1.D.13.i encourages the use of the C&P PTSD Rating Job Aid Web site and VBA-sanctioned Web sites in the list of alternative sources of evidence useful in confirming participation in combat and corroborating claimed in-service stressors. Additionally, stressor verification through review of available personnel records, services records, and other sources such as military and government Web sites prior to a formal request for verification through the Department of Defense's (DoD) U. S. Army and Joint Services Records Research Center (JSRRC) was advocated in a training broadcast in September 2005. C&P is preparing a training letter and subsequent broadcast to provide instruction on proper use of the available electronic research tools in PTSD claims processing and to promote their widespread use prior to submission of requests to JSRRC. C&P's research on the reliability of Web sites not yet listed on its Web site is ongoing.

The DoD has agreed that VBA should be given access to the JSRRC database, which contains unit organizational records for the Army, Air Force, Navy, and Coast Guard. VBA will assess the systematic use of this database and determine the feasibility of VAROs using this resource to research cases, thereby reducing the number of cases sent to JSRRC. Nevertheless, some stressor verification research requests will continue to require JSRRC involvement.

Appendix VII: GAO Contact and Staff Acknowledgments

GAO Contact

Robert E. Robertson, Director, (202) 512-7215

Staff Acknowledgments

The following individuals made important contributions to the report: Irene Chu, Assistant Director; Marta Chaffee; Martin Scire; Ira Spears; Vanessa Taylor; and Walter Vance.

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