
Legislative Program Review and Investigations Committee
Connecticut General Assembly

Department of Veterans' Affairs:
Office of Advocacy and Assistance

Staff Findings and
Recommendations Report

December 16, 2015

**CONNECTICUT GENERAL ASSEMBLY
LEGISLATIVE PROGRAM REVIEW AND INVESTIGATIONS COMMITTEE**

The Legislative Program Review and Investigations Committee (PRI) is a bipartisan statutory committee of the Connecticut General Assembly. Established in 1972, its purpose is to “conduct program reviews and investigations to assist the General Assembly in the proper discharge of its duties.” (C.G.S. Sec. 2-53e) From program review topics selected by PRI, the committee examines “state government programs and their administration to ascertain whether such programs are effective, continue to serve their intended purposes, are conducted in an efficient and effective manner, or require modification or elimination.” (C.G.S. Sec. 2-53d) Investigations require broader legislative approval to begin. The committee is authorized to raise and report bills on matters under its review.

The program review committee is composed of 12 members. The president pro tempore of the Senate, the Senate minority leader, the speaker of the House, and the House minority leader each appoint three members. The committee co-chairs and ranking members rotate every two years between House and Senate members from each party.

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Department of Veterans' Affairs: Office of Advocacy and Assistance

Background

In April 2015, the program review committee authorized a study of the Department of Veterans' Affairs Office of Advocacy and Assistance (OAA). The study's focus was to examine how well OAA provides "aid and benefit" to veterans and their families, primarily in assistance with their claims for federal veterans' benefits. Key areas of analysis included cataloguing OAA activities, evaluating OAA's outcomes, gauging veterans' satisfaction with OAA's services, and examining OAA's collaboration and coordination with public and private entities to serve veterans.

OAA serves as the state's veterans' services organization recognized by the U.S. Department of Veterans Affairs (VA). The office primarily assists veterans who served in the United States Armed Forces and their family members in accessing government veteran benefits and entitlements under federal, state, and local laws.

To those veterans who qualify, the VA offers a myriad of benefits, but they are not granted automatically. Basic eligibility depends on the type of military service performed, the duration of that service, and the nature of discharge or separation. While a veteran can apply directly to the VA for benefits without assistance, the use of a VA-accredited professional in submitting a claim for veterans' benefits is common practice.

Committee staff interviewed OAA personnel; surveyed veterans and their families and municipal veteran contacts; had conversations with external stakeholders including VA personnel and staff from the state labor and social services departments; observed a Bridgeport Interagency Collaborative Project meeting as well as a Veterans Engagement Board Public Forum; and analyzed data from the VA and from OAA.

Main Staff Findings

OAA's effectiveness in assisting veterans and their families is difficult to assess. Per the PRI staff survey, some clients were very pleased with OAA assistance, while others had complaints. Analysis of federal data shows mixed results when comparing OAA to other veterans service organizations and professionals.

Connecticut compares poorly overall to other states in maximizing receipt of federal benefits for its veterans. OAA, as the state's veteran service organization, is at least partially accountable for this poor performance and, with the largest number of service officers of all the state's service organizations, must be integral in its improvement.

Self-represented claimants submit the largest share of compensation claims, but receive the lowest average monthly benefit awards. This raises questions as to whether these claimants may have recouped higher award amounts with the assistance of accredited professionals, like OAA.

Operations are not performance-oriented. Accurate data on general activities and claims workloads is either not tracked or not compiled into an accessible format, preventing analysis of annual trends as well as balancing workloads across district offices.

OAA is not using its information management system to its fullest capacity. District offices are inputting information, but no one knows how to fully extract it. The staff person fluent in management reporting functions retired in 2013 and no one has been trained since then to fulfill the role. This critically limits the ability for program oversight and management.

PRI Staff Recommendations

Recommendations are proposed with a focus on operational improvements in an effort to address identified deficiencies. Key recommendations would:

1. **Identify alternate funding and resource sharing opportunities** through exploration of potential federal grants and collaborations;
2. **Improve training and continuing education** by overhauling OAA's training program for new hires, including formalizing training specific to the main software program OAA utilizes;
3. **Establish meaningful performance standards** which should be incorporated into a functional data management system to assess staff progress on a monthly and annual basis;
4. **Develop, manage, and report on timely and relevant data** namely establishment of a formal development plan to address extensive internal data weaknesses;
5. **Enhance operational efficiencies** such as utilizing the current information management system to its full capabilities and reviewing claims before submission; and
6. **Increase awareness of and access to OAA services** by developing an annual written outreach plan and electronically tracking these activities to determine the impact of such efforts.

Acronyms

BVA	Board of Veterans' Appeals
CCT	Connecticut Careers Trainee
C.G.S.	Connecticut General Statutes
CVLC	Connecticut Veterans Legal Center
DAV	Disabled American Veterans
DIC	Dependency and Indemnity Compensation
DSS	Department of Social Services
DVA	Connecticut Department of Veterans' Affairs
FDC	Fully Developed Claim
FFY	Federal Fiscal Year
FY	Fiscal Year (state)
MOPH	Military Order of the Purple Heart
NCA	National Cemeteries Administration
NVLSP	National Veterans Legal Services Program
OAA	Office of Advocacy and Assistance
PA	Public Act
OVWD	Office of Veterans' Workforce Development
POA	Power of Attorney
PRI	Program Review and Investigations Committee
SEP	Stakeholders Enterprise Portal
VA	United States Department of Veterans Affairs
VBA	Veterans Benefits Administration
VBMS	Veterans Benefit Management System
VFW	Veterans of Foreign Wars of the U.S.
VIMS	Veterans Information Management System
VSO	Veterans Services Officer

LIST OF PROGRAM REVIEW COMMITTEE STAFF RECOMMENDATIONS

Activities and Workload

- 1. The Office of Advocacy and Assistance should dedicate efforts to ensure its existing veteran information management system is used to its maximum potential. This includes ensuring relevant information is entered into the system in a timely and accurate manner. The system should be used as part of the office's routine oversight and management of veterans' benefits claims. Any necessary training should occur to ensure at least one person in each OAA district office and one in the central office have complete knowledge of the system, can extract data, and produce the reports necessary for proper program management and oversight purposes.**
- 2. The Department of Veterans' Affairs should conduct an internal review of the information management system used by the Office of Advocacy and Assistance, and should at least include key OAA staff who frequently use and rely on the system. The review should critique the system to identify whether it meets the current and future data collection and program management needs of both the office and the department. If the review finds the current system incapable of meeting those needs, the department should devise a plan for an alternative system, and work with the necessary stakeholders to implement a new system. If the review indicates system modifications are necessary, OAA should pursue those changes.**
- 3. The Office of Advocacy and Assistance should collect relevant district office activity and workload data, and use the information in the overall management of its program. The veterans' affairs department also should ensure the activity information collected is beneficial for overall departmental resource allocation strategies regarding OAA. Any necessary adjustments to the type of information collected, or how it is collected, should be made accordingly. The information should be used as part of a larger analysis by the department to determine if staff and budget resources are adequately distributed across OAA's district offices.**
- 4. The Office of Advocacy and Assistance should develop an annual written outreach plan. The plan should formally identify strategies for conducting outreach and, to the extent possible, the specific events the office will either sponsor or be a part of. OAA veterans services officers and the manager should have the ability to electronically report their outreach activities, the number of veterans and family members reached, and any formal assistance provided to veterans while at outreach events or resulting from these events.**
- 5. The Office of Advocacy and Assistance should begin tracking electronically the number of visits by veterans services officers to nursing homes and assisted living facilities. The office should also administer the internal controls necessary to ensure the number of nursing home visits is evenly shared across VSOs to the extent feasible. The office should report quarterly to the commissioner and the DVA Board of Trustees on the number of health care facility visits, the number of residents**

enrolled in veterans' benefits programs, information about the benefits veterans in the facilities currently receive, and the outcomes of the visits (e.g., number of veterans enrolled in benefits).

6. The Department of Veterans' Affairs should send semi-annual electronic reminders to health care facility administrators requesting them to notify OAA about new residents who are veterans and any benefits they receive. OAA should use this information to develop an annual visitation schedule for each VSO. The office should frequently monitor the schedules, and use the outcome results in its quarterly report to the commissioner and the Board of Trustees.

Performance Measurement and Oversight

7. OAA should measure the satisfaction of its customers annually. This should ideally be done after VA completion of the client's claim. Low or no cost methods should be explored, including online survey tools, inclusion of a paper survey in other department mailings, and surveying a smaller randomized sample of the population served.
8. OAA should institute a formal system for tracking office-specific complaints. Details related to each complaint, such as the type of complaint, when it was received, when it was resolved, and relevant outcomes, should be recorded. Management should identify and analyze recurring issues and make changes to improve service delivery as needed.
9. OAA should establish fully developed claims as its recommended method of claim submission, using a standard claim submission in only limited circumstances. OAA service officers should educate veterans and their families about the advantages of submitting a fully developed claim to encourage active client participation. An annual goal for the overall use of fully developed claims should be established and measured by OAA.
10. OAA should encourage each client to register for a free eBenefits account as part of its routine intake and claim submission process. Assistance in the registration process should be provided for any clients unable to register independently.

Internal Operations

11. The Connecticut Department of Veterans' Affairs should annually explore potential federal grant opportunities that may be suited for the Office of Advocacy and Assistance. In doing so, DVA should seek collaboration with other relevant state agencies whenever possible.
12. OAA should establish a formal data development plan to address its extensive internal data weaknesses. Current data deficiencies should be inventoried (e.g., unavailable, incomplete, poor quality). Key performance measures should be developed taking into account input from OAA service officers and administrative

staff. This plan should be submitted to the DVA Commissioner and Board of Trustees no later than June 30, 2016.

13. OAA should establish office-wide performance standards and achievement goals for both veterans services officers and administrative support staff. These measures should be incorporated into a data management system, whether by more fully utilizing the capabilities of VIMS or establishing a different tracking system, to assess staff progress on a monthly and annual basis. Quarterly reports based on key performance measures should be developed by OAA and submitted to the department's commissioner and Board of Trustees.
14. The OAA Veterans Services Officer job specification should be revised to more accurately reflect the essential duties of the position as well as the most appropriate qualifications necessary for future candidates applying for consideration.
15. DVA should partner with experts in the field of veterans benefit law to identify weaknesses in the current OAA training program for newly hired service officers. Training for all new hires within OAA should be overhauled to address any identified deficiencies, including training specific to software programs such as VIMS, and formalized. A process to capture institutional knowledge should also be undertaken in advance of anticipated senior staff retirements.
16. OAA should institute a standardized review process to ensure the quality of the claims being submitted by its service officers. This should include review by at least one colleague or supervisor other than the service officer originating the claim.
17. The Connecticut DVA should work with the VA to establish additional sites for teleconference hearings.
18. OAA should explore the possibility of moving its district offices to improve client accessibility and convenience, with particular consideration given to co-location with other relevant services for veterans and their families.
19. The online presence and functionality of the Office of Advocacy and Assistance should be significantly improved. The Department of Veterans' Affairs should undertake a review of the weaknesses of OAA's current website, with particular attention to the validity of its information on veterans' benefits. Ease of navigation and offering capabilities not currently available online, such as eligibility screenings and appointment requests, should be considered.

Collaboration and Coordination

20. An interagency workgroup should be developed to examine the services provided to veterans by state agencies, their service delivery systems, and whether ways exist to consolidate office space and/or administrative functions for a better coordinated veterans' services structure. The workgroup should at least include representatives from the state veterans' affairs, labor, and social services departments. Any recommendations produced by the workgroup should be forwarded to the

commissioners of each agency, the governor's office, and the legislature's veterans' affairs committee by December 31, 2016. The Department of Veterans' Affairs commissioner (or his designee) should lead the workgroup.

- 21. The Department of Veterans' Affairs should annually notify each municipality of its responsibility to designate a municipal employee as the town's veterans' service contact person (in accordance with state law). The notification should require municipalities to submit the name and email address of their contact representatives to the Office of Advocacy and Assistance on a timely basis upon receipt of the DVA's correspondence.**

- 22. Municipal veterans' service contract persons should be required to complete the formal training provided by OAA. The training should be completed one time only, but within three months of becoming the designated municipal veterans services contact person. Any current municipal contact person who has not received the OAA training should do so by April 1, 2016. OAA should offer its training quarterly, which should include a summary of state and federal veterans' benefits, the role of municipal veterans' service contacts, and how OAA can help the municipal contacts should questions arise. OAA should periodically collect feedback from participants as to their overall satisfaction with the training.**

Introduction

Department of Veterans' Affairs: Office of Advocacy and Assistance

The Office of Advocacy and Assistance (OAA) within the Connecticut Department of Veterans' Affairs (DVA) serves as the state's veterans services organization recognized by the U.S. Department of Veterans Affairs (VA). The office primarily assists veterans who served in the United States Armed Forces and their family members in accessing government veteran benefits and entitlements under federal, state, and local laws. This study is focused on OAA's essential role in assisting veterans with their claims for federal veterans' benefits.

To those veterans who qualify, the U.S. Department of Veterans Affairs and the state of Connecticut offer a myriad of benefits. Basic eligibility for receipt of federal VA benefits depends on the type of military service performed, the duration of that service, and the nature of discharge or separation. As a general rule, a veteran is defined as someone who served in the armed forces of the United States and was honorably discharged or released under honorable conditions from active duty.

Federal veterans' benefits are not granted automatically – a veteran and/or his or her eligible family members must claim them. While a veteran can apply directly to the VA for benefits without assistance, doing so may not be in the person's best interest. Navigating the bureaucracy and complexities of veteran benefits law can be challenging for an inexperienced applicant and possibly result in delays to accessing services or benefits, or veterans receiving less than they are entitled. As a result, the use of a VA-accredited professional in submitting a claim for veterans' benefits is common practice.

As discussed in the Legislative Program Review and Investigations Committee (PRI) staff's September 2015 update, federal law dictates that no one may help a veteran and other eligible beneficiaries in the "preparation, presentation, and prosecution" of an initial claim for VA benefits once that person has indicated an intent to file, unless the person providing assistance is accredited by the VA.¹ The VA recognizes three types of groups for purposes of accreditation: 1) representatives of veteran service organizations, such as OAA; 2) attorneys; and 3) claims agents.

Study Scope

In April 2015, the program review committee voted to evaluate the DVA Office of Advocacy and Assistance (see Appendix A for study scope). The study's focus was to examine how well OAA provides "aid and benefit" to veterans and their families. Key areas of analysis included cataloguing OAA activities, evaluating OAA's outcomes in assisting and advocating for veterans, examining whether OAA evaluates its performance and what measures, if any, it uses, determining whether a proper outreach plan exists, gauging veterans' satisfaction with OAA's services, and examining OAA's collaboration and coordination with public and private entities to

¹ 38 USC§ 5901. The only exception to this law is that any one person can help any veteran – one time only – with a claim (38 CFR§ 14.630 & 38 USC§ 5903). To help a veteran a second time requires accreditation.

serve veterans. The DVA's other major units – the Veterans' Home at Rocky Hill and the Office of the Commissioner – are not reviewed in this study.²

Significant OAA internal data limitations led PRI staff to rely almost entirely upon federal VA data for its analysis of OAA activities. By utilizing federal VA data to compare OAA claims volume, utilization of streamlined claims processing tools, and caseload complexity, as well as its own survey of veterans' satisfaction, PRI staff was able to generate some measures for OAA performance. Without sufficient OAA data for analysis, however, the primary study question – how well does OAA serve veterans and their families – could not be conclusively answered.

This resulted, partly, in a shift in focus from OAA performance to the statewide veterans' service system, which includes OAA. An analysis of statewide outcomes, not specifically included in the original study scope, determined Connecticut compares poorly to other states in maximizing receipt of federal benefits for its veterans. OAA, as the state's veterans service organization, is at least partially accountable for this poor performance and, with the largest number of service officers of all the state's service organizations, must be integral in its improvement.

The proposed PRI staff recommendations in this report focus on operational improvements in an effort to address deficiencies identified in the following areas:

- Identifying alternate funding and resource sharing opportunities;
- Improving training and continuing education;
- Establishing meaningful performance standards;
- Developing, managing, and reporting on timely and relevant data;
- Enhancing operational efficiencies; and
- Increasing awareness of and access to OAA services.

Research Methods

This study relied on many sources. To learn about OAA's operations and processes, and to better understand the federal role in veterans' benefits, committee staff completed the following:

1. Interviews/discussions with state agency personnel:
 - Department of Veterans' Affairs: commissioner; General Counsel/Director of Legislative Affairs; and OAA manager, the veterans services officers in each district, and administrative staff
 - Department of Labor: Office of Veterans Workforce Development

² For additional information on the state's Veterans' Home, see: *Veterans' Home at Rocky Hill: Residential Services*, Legislative Program Review and Investigations Committee, Connecticut General Assembly, December 2014. (<https://www.cga.ct.gov/pri/docs/2014/Vets'%20Home%20-%20Final%20for%20PH%20-%202003.02.15.pdf>)

- Department of Social Services: eligibility services representative responsible for working with residents at the State Veterans' Home in Rocky Hill
2. Interviews/discussions with federal government representatives:
 - Department of Veterans Affairs, Veterans Benefits Administration, Hartford Regional Benefit Office
 - VA Office of General Counsel
 3. Interviews/discussions with other key stakeholders:
 - Disabled American Veterans
 - American Legion
 - Veterans of Foreign Wars
 - Connecticut Veterans Legal Center (partnering with DVA for staff training purposes)
 - Private attorney who leads a national veterans assistance business, with clients in Connecticut
 4. Analyzed data and information from:
 - U.S. Department of Veterans Affairs, Veterans Benefits Administration
 - Connecticut Department of Veterans' Affairs
 - Office of Advocacy and Assistance
 5. Observed:
 - Bridgeport Interagency Collaborative Project meeting (42-member stakeholder group examining ways to make veterans services in Bridgeport more efficient and effective)
 - Federal-state Community Veterans Engagement Board *Veterans Public Forum*
 6. Developed, distributed, and analyzed results from a survey of veterans who used OAA services in the past year, and municipal veteran contacts
 7. Used information from testimony provided at PRI's September public hearing on this topic

Report Organization

This report has six chapters and four appendices, with staff findings and proposed recommendations interspersed throughout the chapters. Chapter I summarizes OAA's organization, responsibilities, and role within the VA benefits claims process. Chapter II provides information on veterans in Connecticut who OAA is responsible for serving, and OAA's activities and workload. Chapter III assesses OAA's overall performance in assisting veterans and their family members, including how it compares with other service organizations in the state, using key measures and customer satisfaction survey results. Chapter IV evaluates OAA's internal operations, including personnel, budget, and job resources, accessibility, training and professional development, and management support. Chapter V examines OAA's collaboration and coordination efforts with federal, state, and municipal stakeholders. Chapter VI

reviews Connecticut's overall performance for providing veterans benefits services. Appendix A is the study scope, Appendices B and C are PRI staff's data requests made to OAA and the VA, respectively, and Appendix D is committee staff's survey to Connecticut VA benefits claimants.

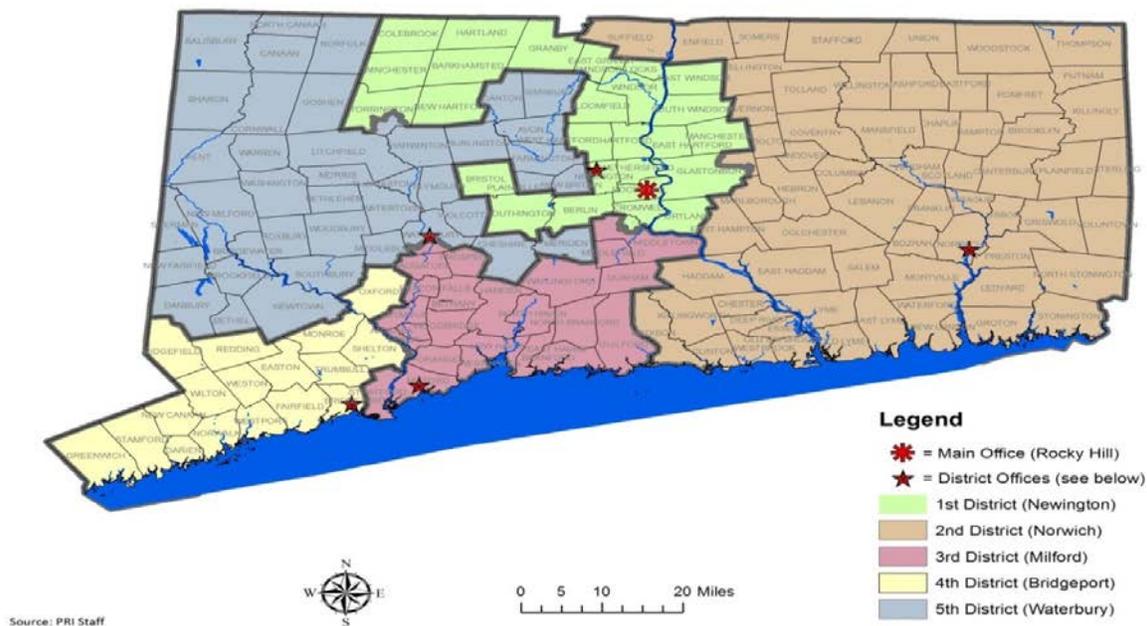
Background

Preliminary background information was provided in the committee staff's September 2015 update. This chapter summarizes key information from the update necessary for context, and includes a brief description of the VA's benefits claims process and the role of the Office of Advocacy and Assistance within that process. Specific findings and recommendations about OAA's activities and performance are provided in later chapters.

Organization

State law allows the DVA commissioner to appoint a unit head to administer a veterans' advocacy and assistance unit for the aid and benefit of veterans and family members.³ The Office of Advocacy and Assistance consists of a central administrative office located at the Veterans' Home in Rocky Hill and one district office in each of Connecticut's five congressional districts, as shown in Figure I-1. OAA's District 1 office is located at the VA's Hartford Regional Benefit office in Newington. Being co-located with the VA allows OAA to regularly interact with VA benefits staff and provide coordination between the VA and OAA's other offices.

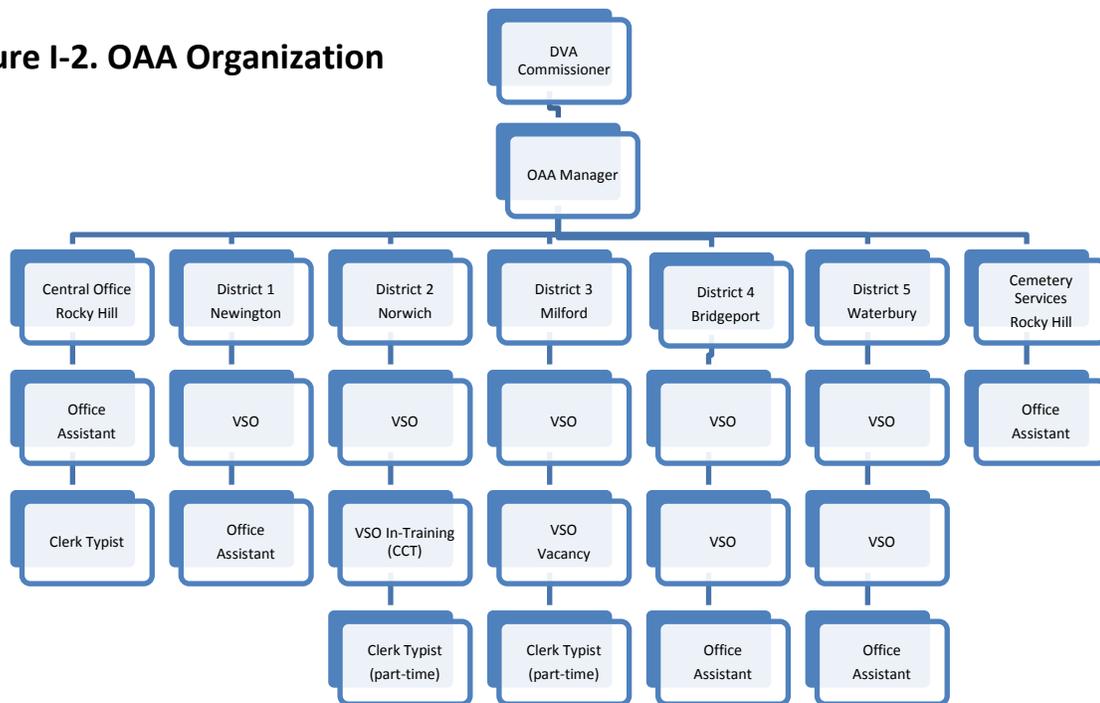
**Figure I-1. Connecticut Department of Veterans' Affairs
Office of Advocacy and Assistance
Office Locations**



³ C.G.S. Sec. 27-102l(b); Also, until FY 05, an appointed deputy commissioner led the Office of Advocacy and Assistance and was a non-voting member of the DVA Board of Trustees when the position was downgraded to a unit manager per P.A. 04-169.

The current staffing and organization of the Office of Advocacy and Assistance is shown in Figure I-2. The office is statutorily required to have a minimum of eight staff members, of whom six must be veterans who hold the state title of Veterans Services Officer (VSO).⁴ Each district office is staffed by at least one veterans services officer, as discussed in Chapter II. At least one VSO must be a woman with a demonstrated interest in the concerns of women veterans, and be responsible for addressing those concerns.⁵ There are currently three women in separate district offices (Bridgeport, Milford, and Norwich) who serve as veterans services officers and assist with female veteran issues as needed, while the Milford office VSO serves in a lead capacity.

Figure I-2. OAA Organization



Source: PRI staff update of OAA organizational chart dated March 2015.

DVA must also employ at least two veterans services officers who are proficient in both English and Spanish.⁶ These service officers help veterans and their families bridge any language barriers when dealing with federal, state, or local benefits, in conjunction with their other VSO responsibilities. At present, one such VSO works in the Bridgeport office (a second bilingual VSO recently left OAA and DVA is in the process of refilling the position).

Responsibilities

The Office of Advocacy and Assistance is responsible for assisting veterans who served in the United States Armed Forces as well as their eligible spouses and dependents in accessing

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

government veteran benefits and entitlements under federal, state, and local laws. The Office of Advocacy and Assistance is Connecticut's state veterans service organization recognized by the VA. In addition to its assistance and advocacy responsibilities, the office:

- handles the administrative functions for burial in the state's veterans' cemeteries;
- maintains the State Veterans' Registry, an electronic database of military discharge paperwork;⁷
- manages the Connecticut Wartime Service Medal program, and maintains a database of medal recipients;
- ensures veterans' eligibility under the state's Veteran Flag Identifier program used for driver's licenses (and state-issued identification cards), and transmitting that information to the Department of Motor Vehicles;
- maintains the state's toll-free Veterans' Info Line;
- refers veterans and family members to other programs for assistance; and
- trains municipal veterans services contact staff.

While OAA veterans services officers assist veterans and their family members on a wide range of veterans' topics and issues, their primary responsibility is to help clients with the federal veterans' benefits process.⁸ Veterans and their families are eligible for a variety of VA benefits. Not including medical care, the most widely used benefit by veterans and their family members – based on the number of recipients and total amounts awarded by the VA – is disability compensation.⁹ Pensions for veterans and their surviving eligible family members (to be distinguished from military service retirement benefits) are the next most common VA benefit.¹⁰

In addition to filing claims, advocacy work is performed by VSOs, on a staff-available basis, at various locations and outreach events throughout the state. Other ways OAA service officers may advocate for veterans and their dependents according to state regulations, include¹¹:

- Address community, civic, and veterans organizations on the needs of the veteran population, and available benefits, services, activities, and programs to which veterans and their families may be entitled to or eligible to receive.
- Visit nursing homes to inform veterans and family members of the federal, state, and local benefits available to them and ensure veterans and family members receive the maximum benefits they are entitled to.
- Develop an information library of available services and resources, and act as liaisons between service providers and recipients.

⁷ The most common proof of benefit eligibility is the Department of Defense Form DD 214, *Certificate of Release or Discharge from Active Duty*, which documents a veteran's type of discharge.

⁸ PRI staff provided a summary of federal (and state) veterans' benefits in its September 2015 update to the committee.

⁹ Disability compensation is a tax free monetary benefit paid to veterans with disabilities that are the result of a disease or injury incurred or aggravated during active military service. Such compensation may also be paid for post-service disabilities that are considered related or secondary to disabilities occurring in service and for disabilities presumed to be related to circumstances of military service, even though they may arise after service.

¹⁰ Pension eligibility is based on an individual's income and other factors, but not service connected disabilities.

¹¹ Regs. Conn. State Agencies, Sec. 27-102I(d)-304.

- Prepare bulletins and public information materials.
- Respond to requests from federal and state elected officials for input on legislation affecting or that may affect veterans' benefits.
- State law also requires veterans services officers to serve as DVA's representatives on community-wide committees involving veterans' issues (and for the DVA commissioner to develop a long-range plan and mission statement for the veterans' advocacy and assistance unit.)¹²

VA Claims Process and OAA's Role

The VA's benefits claims process can involve multiple steps, as discussed below. OAA's veterans services officers play an important role in helping veterans and family members throughout most of the process.

Prior to a benefits claim being filed and as part of the VA's forms standardization initiative, starting in March 2015 veterans and family members may submit an *Intent to File* form for certain claims.¹³ Upon receipt by the VA, this locks in a date of application, provided a claim is submitted within one year.

VA claims may be submitted electronically or by paper application. Based on the required application form and supporting materials for the specific benefit sought, a veteran or family member may:

- 1) independently file a claim using the VA's "eBenefits" system (a web-based portal that allows a veteran to manage all aspects of his/her claim on line) – a veteran may use eBenefits to request assistance from an accredited representative, who can then help him or her with the claims process;
- 2) use a VA-accredited representative to submit a disability compensation claim through the VA's Stakeholder Enterprise Portal (SEP) – SEP also allows VSOs to view the status of claims, see payment history and details, and accept/deny Power of Attorney (POA) (discussed below); or
- 3) manually file the claim – either on own or through an accredited representative (once the VA receives the information, it is sent to one of several special processing units to create an electronic version of the claim from the paper records. The electronic file is maintained in the VA's Veterans Benefits Management Information System (VBMS), and can be accessed through eBenefits or SEP).¹⁴

At any point prior to or during the claims process, veterans and/or their family members may request a VA-accredited representative (e.g., OAA veterans services officer) assist them

¹² C.G.S. Sec. 27-102l

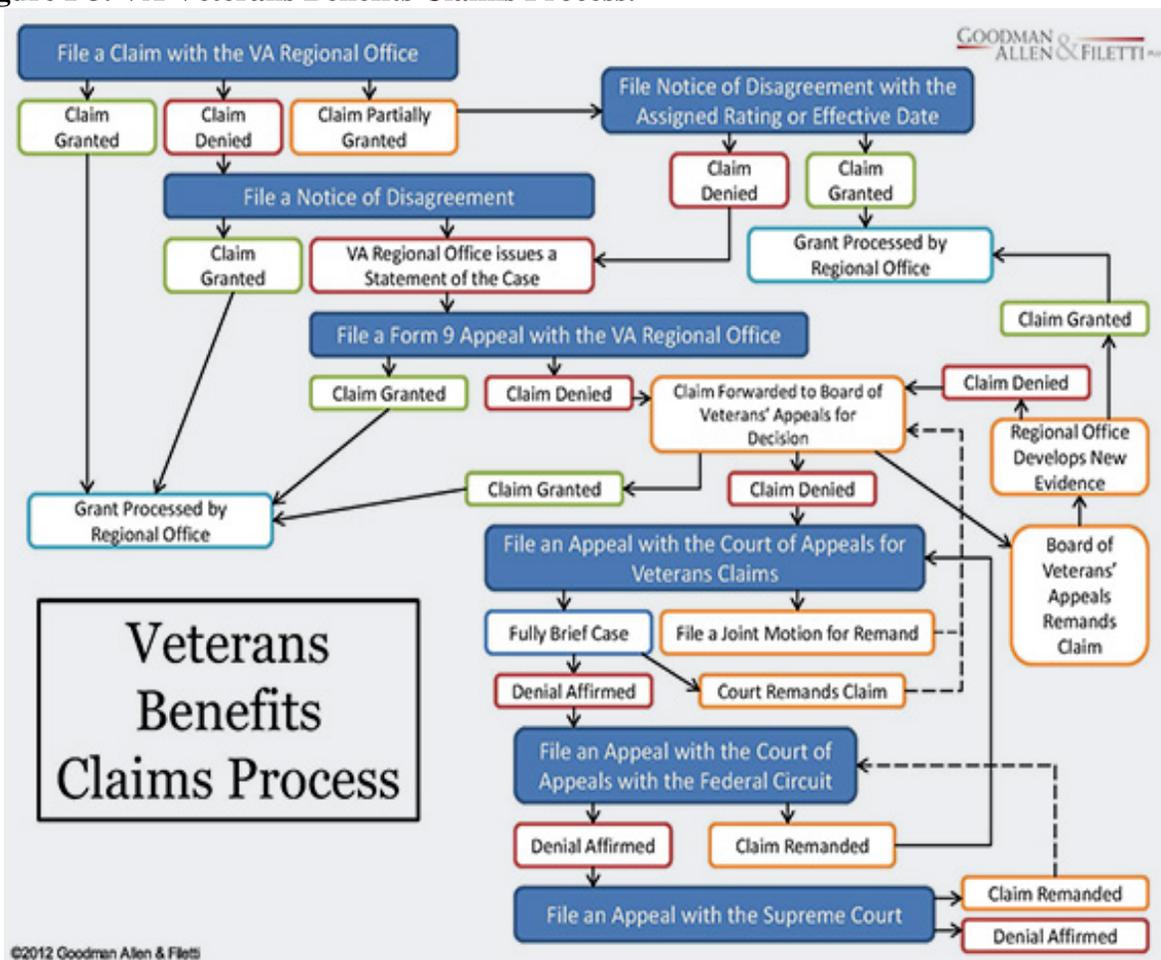
¹³ VA Form 21-0966: Intent to File a Claim for Compensation and/or Pension, or Survivors Pension and/or Dependency and Indemnity Compensation.

¹⁴ Access to SEP and VBMS require special clearances by the VA. Once cleared, a VSO receives an access code and card. In addition, VBMS is a "read-only" system.

with their benefits claim. To do this, the person must first formally designate the representative as Power of Attorney for purposes of representation during the VA claims process. A POA begins the professional relationship between the two parties, and provides the VSO with legal authority to deal with the VA on the client's behalf and access all necessary client records needed as part of the claim. A POA is valid until revoked by either party in accordance with the necessary requirements (e.g., claimant may do so at any time; representative must inform claimant and the VA in writing).

Once a claim has been filed with the VA, there are various directions it can go within the VA's process, as illustrated in Figure I-3.¹⁵ As mentioned, claims may be self-filed by a veteran or family member, or by an accredited veterans services officer, attorney, or private claims agent.

Figure I-3. VA Veterans Benefits Claims Process.



Source: (Internet Link)

https://www.google.com/search?q=va+claims+process+flow+chart&biw=1344&bih=730&tbn=isch&imgil=cCV3bSbe8QnRnM%253A%253BKk8zNpbp0Udf1M%253Bhttp%25253A%25252F%25252Fveteransbenefitgroup.com%25252Fguidelines%25252F&source=iu&pf=m&fir=cCV3bSbe8QnRnM%253A%252CKk8zNpbp0Udf1M%252C_&usq=_g4r6Mmhicg_5RzquRW4Gg8ly91Q%3D&ved=0ahUKEwiXwdfyzM_JAhXK7yYKHWEzCaMQyjcIw&ei=y4xoVtevBcrfmwHh5qSYCg#imgrc=cCV3bSbe8QnRnM%3A&usq=_g4r6Mmhicg_5RzquRW4Gg8ly91Q%3D

¹⁵ While not from an official governmental source, the figure captures the specific steps of the VA benefits claims process.

The key steps within the claims process involve claim submission, VA decision, and appeal. The VA regional office reviewing the claim application may grant a claim, grant a partial claim, or deny a claim. A claimant may reopen a decided claim by submitting new and material evidence. New evidence means existing evidence not previously submitted to the VA. Material evidence means existing evidence that, by itself or when considered with previous evidence of record, relates to an unestablished fact necessary to substantiate the claim.¹⁶ Claims applicants may request a hearing with the VA regional office reviewing their claim at any point during the processing of the claim.¹⁷ Formal decision appeals may be filed by the claimant, as discussed more in Chapter III.

As a way to help reduce its benefits claims backlog, the VA began a process known as “Fully Developed Claim” (FDC) in June 2010. The FDC program is an optional initiative offering veterans and family members faster decisions on compensation, pension, and survivor benefits claims. The claimant submits all relevant records in their possession and records easily obtainable, such as private medical records, at the time the claim is made and certifies that he or she has no further evidence to submit. This program allows the VA to process claims more quickly.¹⁸ If the VA determines additional information exists or is needed, the fully developed claim becomes a standard claim. The VA’s current goal for processing claims is 125 days.¹⁹

OAA role. The actual involvement of an OAA veterans services officer in assisting veterans and family members in the benefits claims process is varied, with the main responsibilities outlined in Figure I-4. Their formal role begins once the VSO is designated Power of Attorney by a veteran or family member for representation during the claims benefits process. This includes providing advice on eligibility requirements, assisting in collecting the required claims information, preparing applications, submitting claims, and working with claimants in tracking their claims. VSOs also help veterans and family members with any appeals they may want to file. OAA’s role with appeals, however, stops after any appeal is made beyond the Board of Veterans’ Appeals.

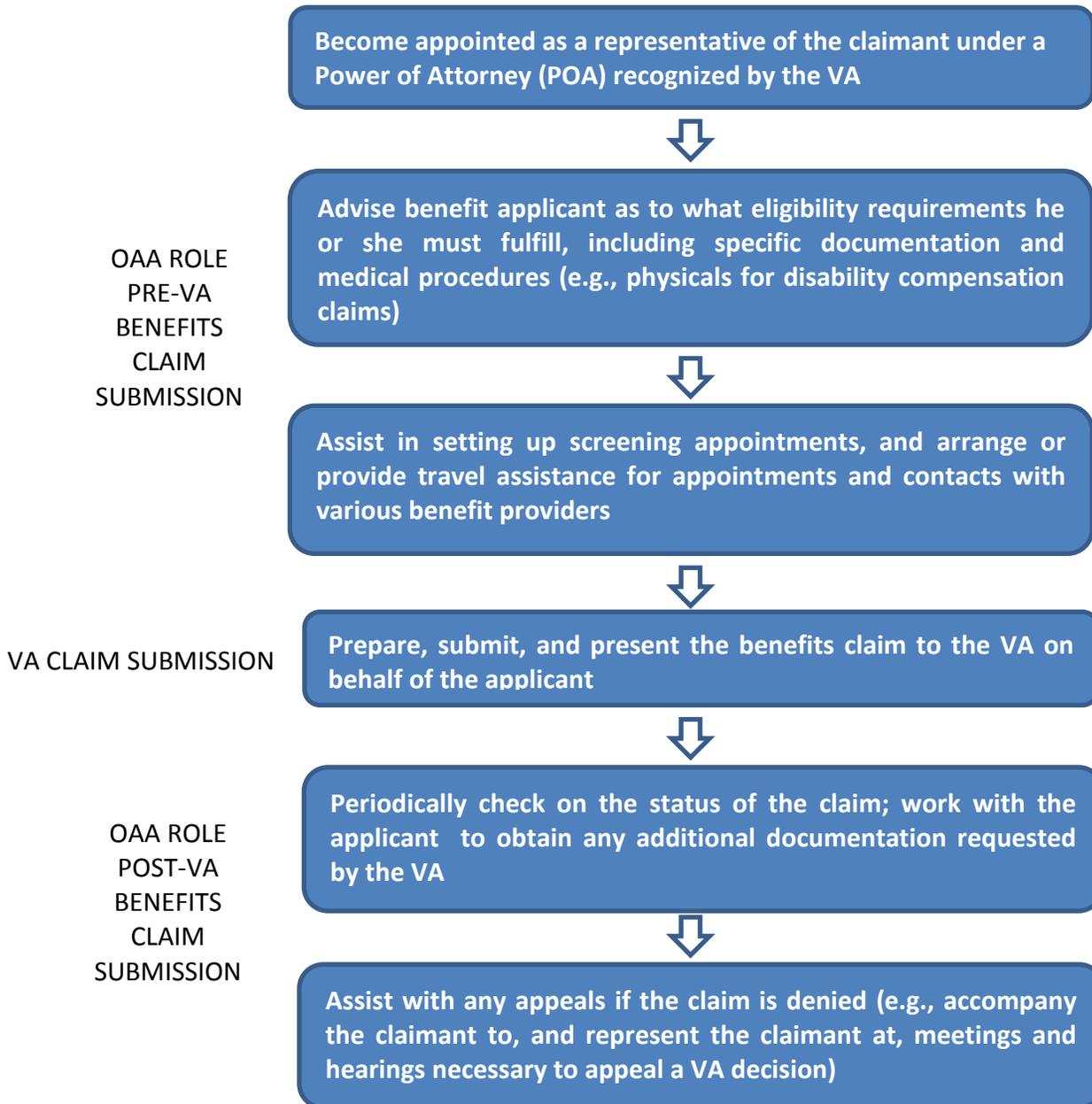
¹⁶ See: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=64a7b4f7d2d890b7f12b682a66d1c336&mc=true&n=pt38.1.3&r=PART&ty=HTML#se38.1.3_15 (accessed November 18, 2015).

¹⁷ See: http://www.benefits.va.gov/WARMS/M21_1MR1.asp (accessed November 18, 2015).

¹⁸ See: http://www.benefits.va.gov/WARMS/M21_1MR1.asp (accessed November 30, 2015).

¹⁹ See: <http://www.benefits.va.gov/TRANSFORMATION/> (accessed November 4, 2015).

Figure I-4. OAA Veterans Services Officers: Claims Responsibilities



Who Does OAA Serve and How Much Is It Doing?

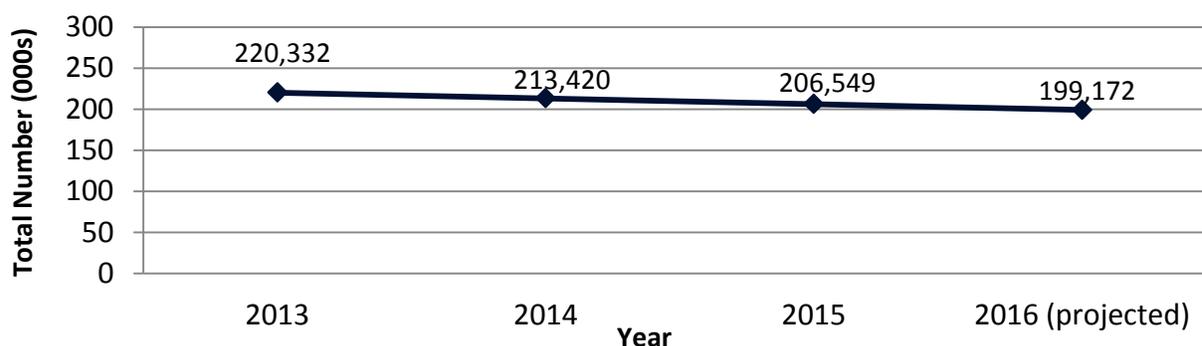
This chapter is divided into two parts: the first part provides a profile of veterans in Connecticut – OAA’s customers – who the Office of Advocacy and Assistance is responsible for assisting and the second part offers a summary of key work activities performed by OAA, mostly through its veterans services officers. The workload information focuses on OAA’s role in assisting veterans and their family members with filing federal benefits claims. Additional information is provided on OAA’s advocacy and outreach efforts, along with a general description of the other administrative functions under OAA’s purview, including operation of the state’s veterans’ cemeteries.

Connecticut Veterans

The profile of Connecticut’s veterans discussed below provides information on the total number of veterans in the state, veterans’ ages and gender, and where veterans live geographically throughout the state. Also included is an overview of the number of veterans according to their period of war service, as well as information on veterans receiving disability compensation benefits and the level of those disabilities. A comparison of select veterans’ characteristics across OAA’s five service districts is also provided.

Number of veterans. Figure II-1 shows the total number of veterans living in Connecticut for 2013-15, as well as the projected number for 2016.²⁰ As of September 30, 2015, 206,549 veterans lived in Connecticut – or roughly six percent to the state’s total population of 3.5 million.

Figure II-1. Number of Veterans Living in Connecticut: 2013-16*



* Totals are federal estimates as of September 30 of each year.

Source: PRI staff analysis of National Center for Veterans Analysis and Statistics data.

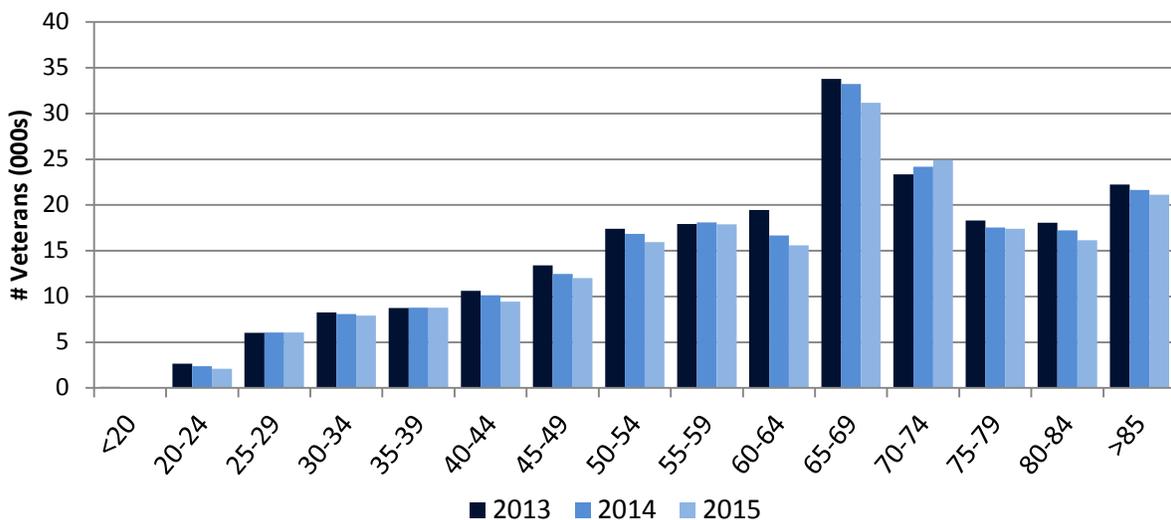
²⁰ The data for each year are as of September 30 of the respective year.

According to the VA’s National Center for Veterans Analysis and Statistics, Connecticut’s veteran population in 2013 was just over 220,000. That figure dropped 3.1 percent to 213,420 in 2014, and fell another 3.2 percent to 206,549 in 2015. Connecticut’s projected veteran population for September 2016 is just over 199,000 – a 3.5 percent decline from the previous year. Over the four-year period examined, the state’s veteran population is anticipated to fall by more than 21,000 veterans, or almost ten percent.

Age. Veterans’ ages can impact how OAA offers its services. For example, younger veterans may be more inclined to rely on technology for their benefits information, assistance with VA applications and forms, and overall communication with OAA, while older veterans may prefer non-electronic means of communicating. Either way, OAA’s services need to be flexible enough to adapt to the diverse needs and preferences of veterans across all age ranges.

Figure II-2 shows the range of ages of Connecticut’s veterans for the three-year period 2013-15. Combined, just over 15 percent of Connecticut’s veterans fell within the 65-69 age group. The age range with the second most veterans was 70-74 (11 percent), followed by a full ten percent of veterans in the state who were older than 85. Relatively few veterans comprised the younger age ranges; a little over one percent of veterans were below 25 years of age. Overall, 54 percent of the veterans living in the state in 2015 were 65 or older.

Figure II-2. Ages of Connecticut's Veterans: 2013-15*



N=640,301

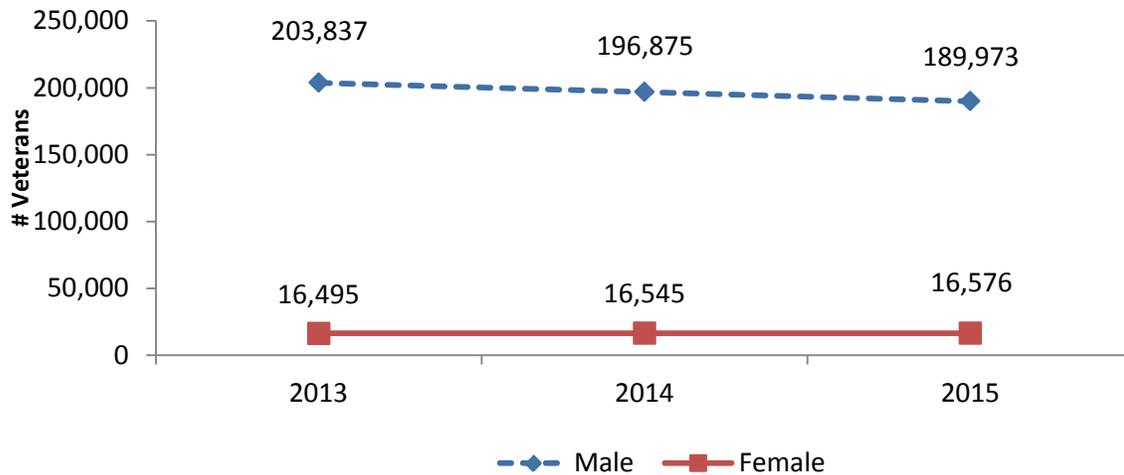
* Figures are federal estimates as of September 30 of each year.

Source: PRI staff analysis of National Center for Veterans Analysis and Statistics data.

The number of veterans by age group either remained steady or declined for each group combined over the three-year period. For example, veterans between the ages of 60-64 decreased 20 percent, from 19,449 to 15,586 veterans, which was the most appreciable decline of all the age groups. In contrast, the number of veterans 70-74 actually increased, from 23,334 to 24,889 veterans, or just under 7 percent.

Gender. Figure II-3 shows Connecticut’s veteran population by gender for 2013-15. The state’s male veteran population decreased almost seven percent over the time period, from 203,837 to 189,973, while the number of female veterans in Connecticut remained relatively steady, at roughly 16,500 for each of the three years.

Figure II-3. Veterans Living in Connecticut by Gender: 2013-15*



* Figures are federal estimates as of September 30 of each year.
 Source: PRI staff analysis of National Center for Veterans Analysis and Statistics data.

Veterans by war period. Another statistic tracked by the federal VA is the number of veterans living in states based on their period of war service. It should be noted the VA information includes a number of different categories and is extensive. To account for the volume of data, Table II-1 only highlights the number of individuals who served in specific wars. Not included in the table is the number of veterans whose service crossed war periods, or who served in between individual war periods (i.e., peacetime veterans).²¹

Overall, the number of veterans in all periods of war declined each year in Connecticut – with the exception of veterans who served in the Gulf War after 9/11 – which increased almost 14 percent over the three-year period, from 19,368 to 22,016 veterans. The table also shows the vast majority of Connecticut’s veterans who served in specific wars and are still living served in the Vietnam War, totaling just under 66,000 veterans in 2015.

²¹ As of September 30, 2015, Connecticut’s veteran population included 149,158 wartime veterans and 57,391 peacetime veterans (National Center for Veterans Analysis and Statistics).

Table II-1. Number of Veterans Living in Connecticut by Period of War Service.

Specific War	2013	2014	2015
WWII (Dec. 1941 to Dec. 1946)	17,282	14,400	11,819
Korean Conflict (July 1950 to Jan. 1955)	21,131	19,533	17,933
Vietnam War (Aug. 1964 to April 1975)	69,231	67,475	65,674
Gulf War (pre 9/11/01)	22,320	22,060	21,791
Gulf War (post 9/11/01)	19,368	20,742	22,016

Note: Figures are federal estimates as of September 30 of each year. Yearly totals do not represent all veterans living in Connecticut during an individual year - only those who served during the specific war service period presented in the table.

Sources: PRI staff analysis of National Center for Veterans Analysis and Statistics data; for war dates, see: (http://www.va.gov/vetdata/docs/SpecialReports/Profile_of_Veterans_2013.pdf).

Service-connected disabilities. Veterans seeking federal disability compensation benefits go through a review process whereby they receive a service-connected disability rating by the VA based on their individual circumstances.²² The ratings for service-connected disabilities increase by increments of ten percent to a maximum of 100 percent. Ratings for each disability are combined using a specific ratings table to determine a total/combined disability rating. As noted before, disability compensation benefits are the most used veterans' benefits, not including health benefits.²³

Federal data specific to Connecticut provide several perspectives based on veterans' service-connected disabilities. Table II-2 summarizes committee staff's analysis of the state's veterans who receive VA disability compensation benefits. The table shows the total number of veterans receiving such benefits, the number of veterans by age and disability rating level, and the number of "issues" per claim (e.g., diagnostic codes for various disabilities, and priority groups such as terminally ill, homeless, former war prisoner), by total, average, and median.

²² Service-connected disabilities are wide-ranging. For a general list of disability symptoms/categories maintained by the VA, see: http://www.benefits.va.gov/compensation/dbq_ListBySymptom.asp. According to data provided to PRI staff by the VA, the top five diagnostic codes for service-connected disabilities for Connecticut claims for 2015 are: lumbosacral or cervical strain; post-traumatic stress disorder; hearing loss; sleep apnea syndromes; and hypertensive vascular disease.

²³ See: *U.S. Department of Veterans Affairs, Veterans Benefits Administration Annual Benefits Report, Fiscal Year 2014* for additional information on the number of veterans according to various federal veterans' benefit programs.

Table II-2. Federal Disability Compensation: Service-Connected Disabilities - Connecticut Veterans (2011-15)

	2011	2012	2013	2014	2015
# Veterans	21,570	22,708	23,398	25,378	-
Age					
<35	2,487	2,846	3,120	3,459	-
35-54	4,866	5,071	5,339	5,976	-
55-74	9,175	9,972	10,362	11,060	-
>74	4,492	4,312	4,070	3,996	-
Combined Rating					
0-20%	9,555	9,526	9,438	9,714	-
30-40%	4,369	4,462	4,495	4,815	-
50-60%	2,794	3,059	3,225	3,638	-
70-100%	4,852	5,661	6,240	7,211	-
Issues					
# issues	5,903	6,008	6,869	6,052	7,851
Average # issues	6.9	8.5	9.6	9.5	9
Median # issues	5	6	7	8	7

Notes: The figures for total number of veterans, age, gender, and rating level are federal estimates as of September 30 of each year through 2014. At times, the VA's figures for individual characteristics may not always correspond with the total number veterans. The figures for number of issues, average number of issues, and median number of issues are estimates based on Connecticut state fiscal years. For 2015, (-) means data not available. Disability ratings are in ten percent increments.

Sources: PRI staff analysis of data from the National Center for Veterans Analysis and Statistics data; Department of Veterans Affairs: Office of Performance Analysis and Integrity; and Department of Veterans Affairs, Veterans Benefit Administration Annual Benefits Report, Fiscal Year 2014.

From 2011-14, there was an 18 percent increase in the overall number of veterans in Connecticut receiving disability compensation benefits, from 21,570 recipients to just under 25,400. Veterans in the 55-74 age group consistently accounted for the most individuals receiving disability benefits of the four age groups analyzed, ranging from 9,175 to 11,060 veterans. The group of veterans under age 35 had the largest increase of all veterans receiving disability compensation benefits over the four years – 39 percent – from 2,487 to 3,489 recipients. The only age group to experience a decrease in benefit recipients was veterans older than 74, which declined 11 percent to just under 4,000 recipients.

Veterans with combined disability ratings of 20 percent or less – the largest of all the groups – annually accounted for roughly 40 percent of service-connected disabled veterans from 2011-14. This group decreased from 44 percent of disabled veterans in 2011, to 38 percent in 2014. Conversely, veterans with combined disability ratings of 70 to 100 percent – the second largest category of disabled veterans– increased from 23 percent to 28 percent.

The overall number of issues²⁴ per claim for veterans receiving disability compensation increased slightly, from 5,900 in 2011, to just over 6,000 in 2014, but then sharply rose to over 7,800 in 2015. The average number of issues per claim increased from 6.9 to 9, or 30 percent,

²⁴ Issues including diagnostic codes for various disabilities as well as other requests for benefits within a claim.

and the median number of issues per claim also rose, and at a much higher rate – from 5 in 2011 to 7 in 2015, or 40 percent.

OAA Activities and Workload

Working with veterans and family members on their benefits claims is the major responsibility of OAA's current seven veterans services officers. As discussed in Chapter I, the process to file for federal veterans benefits involves various steps. It is important to note, while OAA plays a key role in assisting veterans and family members navigate the federal benefits system, including making the initial application for benefits when requested. After OAA submits a benefits claim, the VA oversees claim processing, determines eligibility, calculates awards, and decides on initial appeals. As such, key steps for many of the activities associated with the veterans' benefits process are not under OAA's purview.

Program review committee staff submitted a formal data request to the Office of Advocacy and Assistance seeking workload activity information (see Appendix A). The information requested was intended to assist PRI staff in its overall analysis of OAA's productivity and performance, and cataloguing OAA's activities. Through working with DVA, it was determined that much of the office's program activity information sought by committee staff was either not tracked, or was provided in a manner not consistent with the data request, making analysis of OAA's activities difficult. Committee staff also asked the OAA central office for any paper records available to help support the data request. The records provided were weekly itineraries submitted by veterans services officers located within OAA's district offices throughout the state.²⁵ As a result, PRI staff's analysis of OAA's activities (and performance) was reliant on:

- data provided by the U.S. Department of Veterans Affairs in response to a formal request from committee staff (see Appendix B);
- information available on the federal VA website;
- recent OAA activity data provided to the DVA Board of Trustees; and
- committee staff's manual review of the OAA weekly itinerary records.

Information system. The Office of Advocacy and Assistance maintains an information management system called Veterans Information Management System (VIMS). The system (i.e., software) was designed by a private company, to which DVA currently pays a \$700 annual service fee. The OAA information system was purchased in 2006.

VIMS is a stand-alone internal system, meaning it is not connected to any other state or federal information system, including the VA's automated benefits administration platforms (i.e., eBenefits, Stakeholders Enterprise Portal, and Veterans Benefits Management System). As such, any individual client information or VA claims processing information OAA wants to maintain in VIMS must be manually entered by the district offices. It should be noted that OAA's veterans

²⁵ The OAA manager requires VSOs to submit paper copies of their anticipated out-of-office activities (i.e., itinerary) for each upcoming work week. The information must be submitted by the Friday before the next workweek. Upon the conclusion of a work week, VSOs are to submit their actual activities early the following week. The records are maintained at the OAA central office. The itineraries are intended to help the OAA manager know VSOs' activities, given the VSOs are located in offices throughout the state.

services officers have access to information within the federal systems about veterans and their claims. While the federal VBMS system tracks similar information as is contained in VIMS, committee staff was told three key differences between the systems are: VBMS is a read-only system (i.e., VSOs cannot input information or make changes to existing information in the database); VBMS contains actual copies of pertinent documents filed as part of a claim (e.g., medical records); and VIMS has an open-ended “comment” section that gives VSOs the flexibility to add personalized notes within the system’s individual records, which cannot be done in VBMS.

The VIMS system is designed to allow OAA’s district offices to create records for new clients, manage information about existing clients and their claims, produce management reports, and track pending claims actions and reminder dates set by the offices.²⁶ Specifically, the system has the capacity to store relevant client information (e.g., military history, employment, income, VA benefits awards, disability and diagnostic codes, care facilities information, medical expenses, and burial information). The system also has an internal management reporting function allowing the production of “canned” reports based on certain criteria, as well as ad-hoc reports.

Individual OAA offices are required to keep current most of the data fields available in VIMS. The only information the offices do not routinely enter is a veteran’s income and employment data. Given the types of information VIMS has the capacity to maintain and offices are required to track, along with the system’s management reporting functions, committee staff believes VIMS could contain the program information necessary to fulfill many of the elements in PRI staff’s formal data request or, more significant, for OAA to manage itself in a more informed way. Committee staff was told by the OAA manager, however, the person who best knew how to use VIMS for reporting purposes retired in 2013, and no one has been fully trained since then to undertake this responsibility.

Despite the advantages VIMS appears to offer for the electronic monitoring and reporting of veterans’ information at both the district and central office levels, *OAA is not using its internal veterans’ information management system to its fullest capacity, which critically limits using relevant electronic data for central program oversight and management.* Committee staff recommends:

- 1. The Office of Advocacy and Assistance should dedicate efforts to ensure its existing veteran information management system is used to its maximum potential. This includes ensuring relevant information is entered into the system in a timely and accurate manner. The system should be used as part of the office’s routine oversight and management of veterans’ benefits claims. Any necessary training should occur to ensure at least one person in each OAA district office and one in the central office have complete knowledge of the system, can extract data, and produce the reports necessary for proper program management and oversight purposes.**

²⁶ VIMS – Veteran Information Management System “Introduction to Data Entry Quick Start Guide,” and VIMS – Veterans Information Management System “Introduction to Reports User’s Manual Creating Management, Canned, and Listing Reports, Revised November 2, 2011,” Sterling Solutions.

The sustained success of any program largely depends on collecting, maintaining, and analyzing program performance data. Key to this success is having an information system capable and flexible enough to store and retrieve such data. While committee staff cannot determine whether VIMS is the correct system in the long term for the Office of Advocacy and Assistance, VIMS currently seems to have the functionality to meet OAA's information needs for program management and oversight. Committee staff was also told the system is considered old and in need of updating, which PRI staff cannot validate. However, until the current system is either fully updated to meet OAA's needs or eliminated in exchange for an external system that better serves OAA, committee staff recommends:

- 2. The Department of Veterans' Affairs should conduct an internal review of the information management system used by the Office of Advocacy and Assistance, and should at least include key OAA staff who frequently use and rely on the system. The review should critique the system to identify whether it meets the current and future data collection and program management needs of both the office and the department. If the review finds the current system incapable of meeting those needs, the department should devise a plan for an alternative system, and work with the necessary stakeholders to implement a new system. If the review indicates system modifications are necessary, OAA should pursue those changes.**

Office activities. *Precise OAA office activity information is not available on an annual basis; thus it is not possible to do any meaningful trend analysis, or determine if certain district offices have higher workload volume than others.* Committee staff, however, was told OAA began requiring its district offices this past August to start collecting certain activity information, including the numbers of phone calls received, scheduled and walk-in office visits, and referrals to and from OAA by source. The information is part of OAA's effort to begin formally tracking certain office activities within its five district offices. OAA provided its initial results to the DVA Board of Trustees as part of a new quarterly reporting process. The OAA information for the three-month period August through October shows:

- Calls for assistance: 2,750
- Voice mails received: 525
- Walk-in visits from veterans/family members: 190

If these numbers are typical, and extrapolated to a full year, OAA's district offices will field roughly 11,000 phone calls, receive 2,100 voice mails, and respond to almost 800 veterans and family members seeking assistance from OAA on a walk-in basis.

Committee staff believes collecting and analyzing appropriate office activity information is critical for understanding the overall volume and types of activity and workload experienced by individual OAA offices and VSOs. As a result, such adequate and timely information could aid the department in its overall resource allocation strategies for OAA. For example, offices with more activity and workload may require additional staff time and/or technology resources to help handle their greater demand. In addition, reconfiguring office locations based on activity information could help redistribute workload across all offices, thus alleviating the increased

demand on a particular office(s). Committee staff is not aware that either of these two items is occurring, and thus recommends:

- 3. The Office of Advocacy and Assistance should collect relevant district office activity and workload data, and use the information in the overall management of its program. The veterans' affairs department also should ensure the activity information collected is beneficial for overall departmental resource allocation strategies regarding OAA. Any necessary adjustments to the type of information collected, or how it is collected, should be made accordingly. The information should be used as part of a larger analysis by the department to determine if staff and budget resources are adequately distributed across OAA's district offices.**

Claims volume. Part of the intent of this study was to catalogue OAA's activities to determine "how much" OAA was doing with regard to veterans' benefits, including the number of assistance applications received, the type of assistance sought, and the number of applications accepted or denied. This information is important because it helps provide the necessary context for determining OAA's overall performance, as discussed in Chapter III.

Committee staff requested overall claims activity information from OAA specific to VA disability compensation claims and pension claims. The information requested included the number of claims filed by benefit type, the number of claim applications filed by electronic or paper application, whether the claims were "fully developed claims" (in accordance with VA requirements), the average number of disabilities for applicable claims, and benefit award information. While the information was not available through OAA, some of the data were supplied through the VA, as discussed below.

Intent to File. As noted in Chapter I, as part of its forms standardization process, the VA began offering veterans/family members the opportunity to submit a formal "Intent to File" (form) beginning in March 2015. The main purpose of this form is ensure veterans protect the earliest possible date for any benefit awards using a standardized process; it was also developed to help eliminate any ambiguity with non-standardized, hand-written documents.

According to the VA data received by committee staff, from March 2015 (the form's inception) to October, OAA filed 136 Intent to File forms for veterans and family members. This accounts for 14 percent of the 958 forms submitted by all VA-accredited representatives in Connecticut during that time period.

Claims filed. Table II-3 provides VA disability compensation and pension claims volume data for OAA. The information, provided to committee staff by the VA, is based on state fiscal years 2011 through 2015.

Table II-3. Office of Advocacy and Assistance – VA claims filed volume: SFYs 11-15

	2011	2012	2013	2014	2015	Overall % +/- ¹
Disability Compensation Claims						
Total	850	705	717	635	875	3%
Original	179	147	187	139	203	13%
Supplemental	635	535	505	474	648	2%
Dependency and Indemnity	36	23	31	22	24	-33%
Fully Developed Claims	-	-	26	130	320	1,130%
Electronic Claims	-	-	32	389	832	2,500%
Issues ²	-	31	74	81	79	154%
Appeals (all levels)	143	110	113	107	115	-20%
Pension Claims						
Total	553	421	315	511	341	-38%
Veteran	269	222	107	208	125	-54%
Survivor	284	199	208	303	216	-24%
Issues	-	-	5	3	1	-80%

¹ Figures are rounded
² Veterans who are homeless, terminally ill, former Prisoners of War, under financial hardship, or Medal of Honor recipients.
Source: PRI staff analysis of Department of Veterans Affairs: Office of Performance Analysis and Integrity data.

The total number of disability compensation claims filed by OAA on behalf of veterans or family members fluctuated from FYs 11-15, ranging from a low of 635 in FY 14 to a high of 875 in FY 15. The number of claims filed in FY 15, however, was almost the same as in FY 11. The office averaged 756 claims a year. Moreover, the bulk of OAA’s claims were supplemental (e.g., increased disability evaluation, re-opening of a denied claim, new secondary disability). On average, three out of four claims for the period examined were supplemental claims.

The number of Fully Developed Claims and claims filed electronically increased sharply since 2013, the first year the information was available. OAA experienced an increase in the number of claims with special conditions (i.e., “issues”) – yet, such claims never accounted for more than 13 percent of all disability compensation claims. In addition, the number of resolved appeals for OAA’s clients was down 20 percent from 2011, and averaged 118 cases a year.

Outreach. The Office of Advocacy and Assistance provides “outreach” to veterans and their family members. The purpose of these efforts is to apprise veterans about the benefits veterans’ are entitled to as a result of their military service, inform veterans of the services available through OAA, and assist with benefit claims if possible.

Record keeping of outreach efforts by veterans service officers is maintained through the manually-developed weekly itineraries sent to the OAA central office by districts (discussed above), and are not summarized into any readily accessible format. Committee staff examined a year’s worth of the itineraries to capture the number of outreach events attended by VSOs and the types of outreach performed. Not included in committee staff’s analysis are the events attended by the OAA manager, which are maintained in the manager’s electronic calendar.

Review of the weekly itineraries for FY 15 showed 101 individual outreach events were attended by VSOs, or roughly 14 annual events per service officer. The events were varied, and included making presentations about veterans' benefits at local community and senior centers, attending job fairs, attending meetings at town halls to discuss veterans' issues, making contact with veterans living in shelters, and meeting veterans at Oasis Centers located throughout the state.²⁷

Although OAA is conducting outreach, and recent efforts have been made to strengthen OAA's presence in the community to reach veterans, *the office does not have a formal written outreach plan with implementation strategies and measurable goals. As a result, OAA cannot fully determine the impact its outreach efforts have in assisting veterans.* Committee staff recommends:

- 4. The Office of Advocacy and Assistance should develop an annual written outreach plan. The plan should formally identify strategies for conducting outreach and, to the extent possible, the specific events the office will either sponsor or be a part of. Veterans services officers and the director should have the ability to electronically report their outreach activities, the number of veterans and family members reached, and any formal assistance provided to veterans while at outreach events or resulting from these events.**

The goal of the recommended outreach plan and electronic reporting system is for OAA to quickly and accurately determine the level of community interaction performed by the office, the number of veterans reached, and the impact such efforts have on assisting veterans and their family members.

Care facilities. Part of OAA's advocacy efforts includes visiting veterans and their family members in nursing homes and assisted living facilities. State law requires the DVA commissioner "to conduct interviews in the nursing homes or hospitals throughout the state to determine the number of veterans admitted and ascertaining which benefits such veterans are currently receiving and are entitled to receive,"²⁸ which is done through OAA. According to the state's public health department, a total of 340 long-term care facilities²⁹ and 115 assisted living facilities³⁰ are spread throughout the state. Committee staff was told by OAA that each of its districts has roughly the same number nursing homes, or about 70 per district.

VSOs are required to record their visits to care facilities in the weekly itineraries sent to the OAA manager. Committee staff reviewed the itineraries to better understand the number of visits made to such facilities. Only one year's worth of itineraries were reviewed, thus no trend analysis was possible. The weekly itineraries for FY 15 showed VSOs made 143 visits to care

²⁷ Each public college in Connecticut has a veterans' OASIS (Operation Academic Support for Incoming Service Members) center. The centers provide veterans with space to study, meet counselors, and be with other veterans.

²⁸ C.G.S. Sec. 27-102l(c)(2)

²⁹ *Nursing Home Facilities Licensed by the State of Connecticut 2011-2012* (Chronic and Convalescent Nursing Homes, Rest Home with Nursing Supervision, and Residential Care Homes), Connecticut Department of Public Health.

³⁰ The state's public health department licenses the clinical services (i.e., the activities of daily living provided through professional trained staff) that an Assisted Living Service Agency provides at an assisted living facility.

facilities during the year, but the numbers varied by district. While additional analysis is necessary to more fully understand OAA's volume of visits (and results) over time, the file review showed *visits to care facilities were inconsistent among veteran services officers; some VSOs made numerous visits, while others made relatively few.*

Committee staff is aware of one service officer who was on a three-month leave during the fiscal year analyzed, which may account for that officer's low number of visits. Accounting for that, there was still a relatively wide range in the overall number of visits among the other officers. Understanding the number of health care facility visits must be balanced with VSOs' other responsibilities, it would not be prudent for VSOs either to spend most of their time visiting care facilities nor very little time at such facilities – both practices come at the possible expense of VSOs assisting veterans and family members either in the community or living in health care facilities. Moreover, while OAA's data management system, VIMS, has a care facility function, the module does not seem to be used, since paper records are still used to track nursing home and assisted facility visits. Committee staff recommends:

- 5. The Office of Advocacy and Assistance should begin tracking electronically the number of visits by veteran services officers to nursing homes and assisted living facilities. The office should also administer the internal controls necessary to ensure the number of nursing home visits is evenly shared across VSOs to the extent feasible. The office should report quarterly to the commissioner and the DVA Board of Trustees on the number of health care facility visits, the number of residents enrolled in veterans' benefits programs, information about the benefits veterans in the facilities currently receive, and the outcomes of the visits (e.g., number of veterans enrolled in benefits).**
- 6. The Department of Veterans' Affairs should send semi-annual electronic reminders to health care facility administrators requesting them to notify OAA about new residents who are veterans and any benefits they receive. OAA should use this information to develop an annual visitation schedule for each VSO. The office should frequently monitor the schedules, and use the outcome results in its quarterly report to the commissioner and the Board of Trustees.**

It is understandable if OAA cannot reach all 455 nursing homes and assisted living facilities in a given year because of finite staff resources. At the same time, a more structured planning process is needed to ensure a more rigorous and evenly-shared health care facility monitoring program among VSOs, including one that has measurable goals and outcomes.

Other services. The Office of Advocacy and Assistance is charged with administering several functions in addition to its assistance and advocacy efforts regarding veterans' VA benefits. Various OAA central office administrative staff help oversee the state's veterans' cemeteries, and administer the wartime medal program, the state veterans' registry, and the state's driver's license flag program for veterans. Since this study primarily focused on OAA's role and performance within the VA benefits process, a review of these additional OAA responsibilities was limited to general output information.

Cemetery/burial. The Department of Veterans' Affairs operates three veterans' cemeteries: Connecticut State Veterans' Cemetery in Middletown, Spring Grove Cemetery in Darien, and Col. Raymond Gates Cemetery in Rocky Hill. The Middletown cemetery is the only state-run cemetery open to veterans and their spouses;³¹ the Darien cemetery closed in 1964, and the Rocky Hill cemetery is only available to residents of the Veterans' Home. The Middletown veterans' cemetery is undergoing a \$2.6 million expansion to provide more burial space, with assistance from federal grants.

OAA's cemetery services unit fields inquiries, coordinates with funeral homes, schedules burials, and works with DVA's grounds and maintenance personnel who are responsible for the cemeteries' upkeep. Prior to mid-2014, a full-time VSO and an administrative staff person were responsible for managing the daily operations of OAA's cemetery services unit. At that time, the service officer moved to OAA's Waterbury office, leaving one administrative staff person responsible for the unit.

Information from OAA shows internments at the veterans' cemeteries remained relatively steady for FYs 13-15 – 639, 596, and 592 respectively. The department receives federal reimbursements for veterans' burials, which helps offset DVA costs. There is a \$734 federal plot allowance provided to the state for all internments at state-operated veterans' cemeteries, with no charge to veterans and eligible spouses (maximum of one spouse per veteran for burial). There is also a \$100 state payment to veterans and family members for headstones and foot markers. This payment is made regardless of whether the person is buried at a state veterans' or private cemetery.

The National Cemetery Administration (NCA) conducts five-year reviews of veterans' cemeteries receiving grant funding from the VA. The reviews base cemeteries' performance against VA operational standards and measures. A review of Connecticut's cemetery services unit was completed in April 2014. The review's results were mixed, and the state's veterans cemetery services were deemed "provisionally compliant" with the VA requirements.³² Of the 83 measures reviewed, Connecticut met the standards for 52 of them, for an overall compliance rating of 63 percent. Some of the strengths noted in the review include staff being committed to a high level of service and eager to meet standards and learn new business practices, and rapid scheduling of internments. Areas needing improvement were varied, but mostly included issues with headstones and grave markers, including their proper disposal when no longer useable. An action plan with strategies to address the deficiencies was submitted by OAA to NCA two weeks following the review. OAA has not heard from NCA regarding the plan, and is proceeding with implementing the plan's changes.

³¹ Veterans eligible for burial are those who: 1) are honorably discharged from, or released under honorable conditions from, active service in the United States Army, Navy, Marine Corps, Air Force or Coast Guard or any women's auxiliary branch thereof; 2) completed at least twenty years of service in the Connecticut National Guard; or 3) were killed in action, or who died as a result of accident or illness sustained while performing active service in the military or any women's auxiliary branch thereof, or in the Connecticut National Guard.

³² Ratings are "compliant," "provisionally compliant," or "noncompliant." Provisionally compliant means overall performance is at a minimally acceptable level based on grant terms and conditions, and the cemetery needs to submit an action plan to address deficient areas and demonstrate progress toward remediation.

State veterans registry. OAA is responsible for storing electronic copies of discharge documentation for veterans residing in the state who have been honorably discharged. The federal VA sends veterans' discharge information to OAA if, upon release from the military, veterans signify on their discharge papers that Connecticut is their home of record. The office ensures the information is properly entered into a database, which contains information for over 110,000 Connecticut veterans.

Driver's license flag. In 2013, Connecticut began issuing driver's licenses (and state-issued identification cards) indicating a person was a veteran who met certain requirements. Licenses may be marked with the American flag, for identification purposes. Veterans must first complete and submit an application (found on the DVA website) to OAA. The office is responsible for checking the applicant's veteran status. Upon successful completion of the check, the relevant information is sent to the state motor vehicle department, which produces the driver's license flag identification. Since the program's inception, OAA has processed over 11,000 applications.

Service medal. All Connecticut veterans are eligible to receive the Connecticut Veterans Wartime Service Medal if they meet certain veterans' status requirements. Veterans must complete the DVA application, available online, and submit it to OAA which verifies the applicant meets the eligibility requirements, including proof of service.

OAA maintains a database of the Connecticut veterans and current service members who have been awarded the Wartime Service Medal. Since the program began in 2005, OAA has issued over 31,300 medals to Connecticut veterans. The cost of the ribbons and medals is paid from state funds appropriated to the military assistance account within the Military Department. Within existing budgetary resources, medals may be made posthumously for veterans who died on or after January 1, 2000 – 519 such medals were awarded in FY 15.

Veterans Info Line. The Office of Advocacy and Assistance operates a dedicated phone line (1-866-9CT-VETS) to assist veterans and others with their questions about veterans' benefits, military records, referrals to other public agencies for services, and veterans services officers. For FY 15, OAA reported an average of 30 phone calls to the Info Line were received daily.

How Well Is OAA Performing?

The primary purpose of this study was to assess how well OAA serves veterans and their families. The previous chapters described OAA's role in helping clients apply for federal veterans benefits, how this role translates into various job activities, and how frequently these activities are being carried out. The results of these activities – key to answering the main research question – are provided in this chapter.

What indicators should be used to measure OAA's performance? Committee staff initially asked OAA for the measures it was already using, however, ultimately confirmed an overall lack of performance orientation. Next, staff attempted to identify best practices within the field of veterans' benefits to which OAA's processes and performance metrics could be compared. Internal and external stakeholders alike were unaware of any such standards, however. As previously discussed, a request for data was sent to OAA from which PRI staff planned to derive a variety of indicators to gauge office performance such as average processing times, grant/denial ratios, and total benefits awarded. Significant OAA data limitations ultimately led PRI staff to develop alternative sources of information about OAA performance, the results of which are presented in this chapter.

Development of OAA performance data took two tracks: 1) generating original OAA customer satisfaction data; and 2) benchmarking OAA processes and performance metrics to other accredited representatives in the state. To generate OAA customer satisfaction data, PRI staff developed an anonymous survey and mailed it to veterans and/or family members identified as having filed a claim for federal benefits during the past fiscal year. In order to examine OAA's performance relative to other veteran service organizations, committee staff requested statewide statistics on compensation and pension claims from the VA.³³

There are limitations given the fact that the bulk of the data received by PRI was provided by the VA and not by OAA. The VA data is understandably focused on its own processes and outcomes. As a result, the VA data do not provide any insight into what is occurring between the first point of contact with OAA and a veteran and the submission of a claim on his or her behalf, so OAA internal measures, such as claim submission processing times, cannot be determined.

In addition, the VA claims data have their own limitations, typical of issues related to multi-step claims processing systems. Two different types of data can be reported: 1) the number of actions occurring in a fiscal year (e.g., number of claims filed, number of filed claims denied); or 2) what happened to a specifically identified set of claims (e.g., all claims filed in 2012) over time. The VA claims data PRI requested, which was challenging enough to obtain, were by fiscal year, which offered very useful information, but ultimately could not provide a

³³ The completed data request sent by PRI staff in early August was fulfilled by the Veterans Benefits Administration (VBA) Office of Performance Analysis & Integrity and received by PRI staff on November 9.

very basic measure of the initial denial rate of OAA claims. (This is further evidence of the benefits of OAA tracking (as well as aggregating and analyzing) all the steps the claims it files on behalf of veterans may take.)

Without sufficient OAA data to fill in the remaining gaps, the primary study question – how well does OAA serve veterans and their families – could not be conclusively answered. Nevertheless, PRI staff believes there is sufficient evidence, as discussed below, to justify room for improvement in OAA performance and related processes.

SURVEYING VETERAN SATISFACTION

With its mission “To Serve Those Who Served” the Connecticut Department of Veterans’ Affairs serves the needs of the state’s veterans pursuant to the provisions of C.G.S. Secs 27-102l through 27-137. In line with the DVA’s mission, the most important measure of OAA’s performance, according to the office manager and staff, is the satisfaction of the veterans and family members they serve. Customer satisfaction can be measured in two ways – proactively seeking feedback, as well as responding to informal and formal complaints. Until recently, OAA has not surveyed its customers for feedback on the claims process.³⁴ Furthermore, although OAA strives to respond quickly to any formal complaints received by the Department of Veterans’ Affairs on its behalf, these complaints are not tracked. *With no formal centralized system to collect or analyze customer feedback, OAA’s performance in meeting the satisfaction of the veterans it serves is not being measured.*

OAA is currently developing its own customer satisfaction survey incorporating many of the questions from the PRI survey. Without funding for postage to mail these surveys to clients or provide postage-paid return envelopes, however, OAA is planning to distribute surveys to clients at the conclusion of their intake meeting.

PRI staff supports OAA efforts to begin formally gauging the satisfaction level of the veterans and families they serve; however, reservations exist about the proposed method to do so. For example, a survey taken immediately after a client’s initial meeting with his or her service officer, when the claim has possibly just been submitted to the VA, would only capture a small portion of feedback on the OAA experience. Whether all paperwork is filed properly and in a timely fashion, how responsive the officer is in providing status updates, and the level of assistance provided should the claimant decide to appeal the VA’s decision (all areas which garnered negative PRI survey feedback) would not be captured. Furthermore, with the plan for each district office to distribute surveys after client intake meetings, a difficult client might be excluded for fear of criticism. Finally, a lower survey completion rate could result as each client would have to cover the cost of mailing the completed survey back to OAA. PRI staff recommends:

- 7. OAA should measure the satisfaction of its customers annually. This should ideally be done after VA completion of the client’s claim. Low or no cost methods should be explored, including online survey tools, inclusion of a paper survey in other**

³⁴ Upon federal recommendation, OAA instituted a customer satisfaction survey in its Cemetery and Memorial Services unit.

department mailings, and surveying a smaller randomized sample of the population served.

- 8. OAA should institute a formal system for tracking office-specific complaints. Details related to each complaint, such as the type of complaint, when it was received, when it was resolved, and relevant outcomes, should be recorded. Management should identify and analyze recurring issues and make changes to improve service delivery as needed.**

To gauge OAA customer satisfaction for this study, PRI staff developed an anonymous survey (see Appendix D) and mailed it in mid-October to 710 veterans and/or family members identified by OAA as having filed a claim for federal veterans' benefits during FY 15.³⁵ A total of 55 mailed surveys were returned as undeliverable. PRI staff received 167 returned surveys of 665 – a response rate of 25 percent. Two-thirds of survey respondents identified themselves as veterans, with the remaining one-third primarily spouses or widows/widowers (23.5 percent) and adult children answering on behalf of the veteran or spouse (8.4 percent).

Given the lack of data relating to the OAA claims process, PRI staff also utilized the survey instrument to gain information about how respondents interacted with their service officers. Responses to the question, "How did you first learn about the Connecticut Office of Advocacy and Assistance?" showed the value of informal "word-of-mouth" recommendations with the most respondents hearing about OAA from other veterans or through a Vet Center or Veteran Coffeehouse (32 percent) or family and friends (18 percent). Veteran-specific outreach events, including the DVA's annual Stand Down event, as well as municipal veteran contact referrals, comprised 14 percent. The remainder of respondents learned about OAA through a variety of more formal ways – including referrals from nursing homes or assisted living facilities (8 percent), healthcare professionals (5 percent), attorneys (4 percent), or other state agencies (4 percent).

Most respondents (86 percent) confirmed having an in-person meeting with their service officer to go over their eligibility for veterans benefits. The majority of these face-to-face meetings took place at an OAA district office (65 percent), followed by meetings taking place at the respondent's home or nursing home/assisted living facility (27 percent), as well as at a vet support center or coffeehouse (8 percent).

The next portion of the survey asked respondents to rate their level of agreement or disagreement with a series of statements about their OAA experience.³⁶ The general customer service ratings were mostly positive – 89 percent of survey respondents either "agreed" or "strongly agreed" that their service officer was 1) courteous, 2) professional, and 3) gave his or her full attention. Technical skill ratings remained positive but were slightly lower – 86 percent of respondents answered that their officer 1) fully understood veterans' benefits laws and regulations and 2) answered all of their questions.

³⁵ OAA provided PRI with mailing labels after removing clients who had been reported deceased as well as clients with known conservators from the sample.

³⁶ Using a scale of one to five (1 = Strongly Agree; 2 = Agree; 3 = Neutral; 4 = Disagree; and 5 = Strongly Disagree)

OAA scored slightly lower in terms of the specific claims process – 82 percent of respondents “agreed” or “strongly agreed” that their service officer clearly explained the overall process and what the next steps would be. Eighty percent of respondents thought their service officer clearly explained the claimant’s responsibilities and the officer’s responsibilities in the claims process. In terms of responsiveness, 80 percent of respondents believed their officer answered their phone calls or e-mails promptly. Overall, when asked if they were satisfied with OAA’s representation of their claim, 80 percent “agreed” or “strongly agreed,” and 81 percent would use OAA again to file a claim in the future.

The final part of the survey offered respondents an open-ended comment section to provide further detail about their experience and suggestions for improving OAA’s services. More than half (93) of respondents provided written comments. While it is difficult to fully quantify subjective comments, PRI staff selected the following comments to highlight several recurring themes.

Satisfied Customers

Positive comments from survey respondents included gratitude for the assistance OAA provided, often going beyond their expectations. Respondents were pleased by how easily their service officer managed the complicated VA claims process.

“...I cannot say enough good things about her. She is very caring, very professional and very knowledgeable...She was very helpful...With the benefits I am receiving, I can now stay in my own home!! Thank you for the assistance. God Bless America!”

“[Service officer] was outstanding. He met all my requirements and then some! I would not hesitate to refer him or use him again!”

“I only met with my OAA Rep to go over health insurance eligibility and she went above and beyond. I left with my health insurance claim set up and my disability claim also set up. Every call or email I sent to her was responded to immediately. She made it very easy for me to take advantage of the benefits out there for veterans like myself.”

“They were so helpful and lawyers wanted thousands of dollars to navigate the application process, where [service officer] provided us the valuable knowledge at no cost. Thank you State of Connecticut and Department of Veterans' Affairs!”

Negative experiences were reported as well, which detailed missing paperwork, significant filing delays, a lack of communication about claim status, and lack of assistance with appealing denials.

Missing or Delayed Paperwork

“I was not satisfied with my benefit claim, my OAA service officer claimed she sent in all my info on appeal but the benefit office said they didn't receive the test they wanted. I had the test with my heart doctor, he faxed them, plus I had my service officer mail the paper copies.”

“Claim was continually scrutinized for missing or inappropriate evidence resulting in a 6-7 month delay in services.”

“We put in claim for benefits in June and you didn't get around to filing it till 3 months later! My mother passed away in September so we missed out on 3 months of benefits!”

Frustration with Lack of Communication

“I didn't understand anything about this claims process. No one ever called back after that visit at [the nursing home]. I just gave up. I am too old to deal with this.”

“Got zero help from officer. Never even submitted a claim I gave him Dr's documentation for. Called 3 times left msg and e-mail. No Response!! A joke!”

“...Never received notice that my case was transferred to a new rep.... I find that very disrespectful again.”

Timeliness of VA Decisions

“I had to wait 6 months before I got a claim. That seemed like a long time. It was because I needed the care and had to wait.”

“Claim was filed in Feb. and I have still not received any funds.”

“Would have been nice if they would call you to let you know the progress during the claims process for federal benefits.”

Lack of Assistance Upon Denial

“I was denied benefits for a hearing loss...when OAA was notified advice was given; no assistance however was provided; left it entirely up to me to put the appeal process together...I am not returning for further assistance as I am very unhappy with the OAA follow-up with me.”

“Claim was rejected with copy to OAA. Indicated a form not received. OAA did nothing.”

BENCHMARKING PERFORMANCE

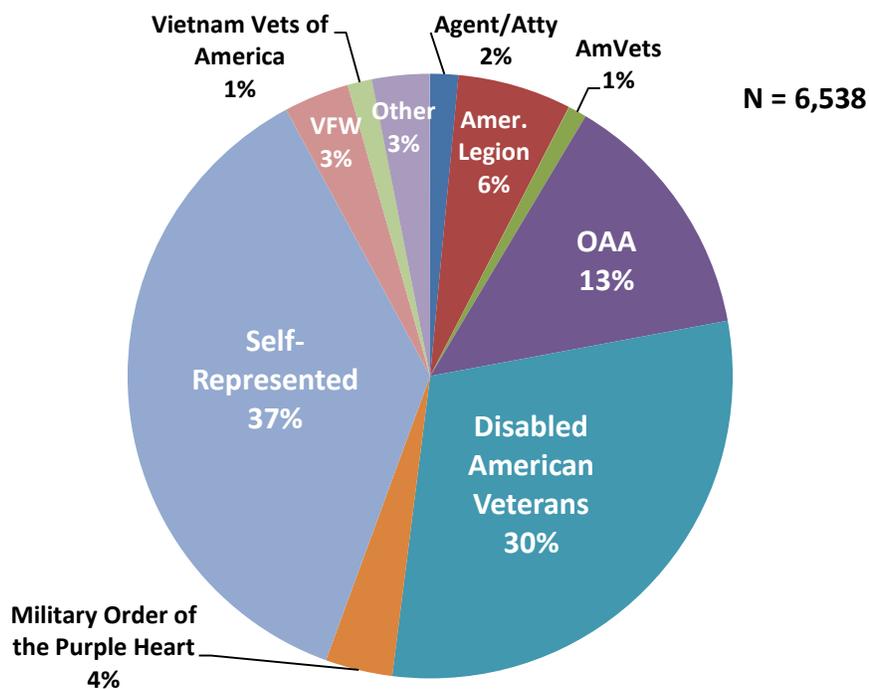
Benchmarking as an instrument for assessing organizational performance in the public sector typically involves comparisons to other state governments, due to the lack of equivalent services in the private sector. Comparing Connecticut to California, for instance, while useful to a certain extent, may not be the most ideal analysis given significant differences in areas like size of government and population demographics. This is uniquely not the case in the field of veterans' services, however, the federal VA recognizes both public and private entities, through its accreditation process, to adequately represent veterans applying for benefits. As a result,

indicators of performance for OAA were able to be compared to those of other veteran service organizations, accredited attorneys, and claims agents within Connecticut’s veteran services system. In order to accomplish this, PRI staff requested statistics on claims for federal VA benefits submitted by all Connecticut veterans and eligible family members for the last five years, broken out by who submitted the claim, from the VA. The remainder of this chapter is dedicated to staff analysis of the VA’s response to this data request in three main areas: compensation claims, pension claims, and appeals.

Compensation Claims

Caseload. As shown in Figure III-1, the following six groups handled the majority of compensation claims for Connecticut’s veterans and their families in FY 15: 1) claimants representing themselves (37 percent); 2) Disabled American Veterans (30 percent); 3) Office of Advocacy and Assistance (13 percent); 4) American Legion (6 percent); 5) Military Order of the Purple Heart (4 percent); and 6) Veterans of Foreign Wars of the United States (VFW) (3 percent). Of particular interest is the fact that *self-represented claimants submitted the largest share (37 percent) of compensation claims in FY 15.*

Figure III-1. Connecticut Compensation Claims by Representation for FY 15



Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

Analysis of caseload is strengthened by examining the VSO staffing levels of these organizations. PRI staff interviewed service officers from the American Legion, Disabled American Veterans, and Veterans of Foreign Wars. The sole service officer of the Military Order of the Purple Heart was also contacted but not interviewed. Using staffing levels provided by

these organizations to committee staff, the average annual disability compensation caseload for each was calculated, with the results listed below in Table III-1.

Table III-1: Average Annual Volume of Compensation Claims Completed Per VSO for FY 15

Selected Veteran Service Organizations / # VSOs	Average Caseload / VSO
CT Office of Advocacy & Assistance (OAA) (8 VSOs)	109
Military Order of the Purple Heart (1 VSO)	147
American Legion (2.5 VSOs)*	186
Veterans of Foreign Wars (VFW) (1 VSO)	217
Disabled American Veterans (3 VSOs)	655

Notes: Service organizations selected are the only service offices co-located with the VA’s Hartford Regional Benefit Office. Numbers of VSOs is a point-in-time figure and does not account for any long-term leaves of absence or any other factors possibly affecting output.

* Includes 1 VSO who works part-time as a volunteer for American Legion.

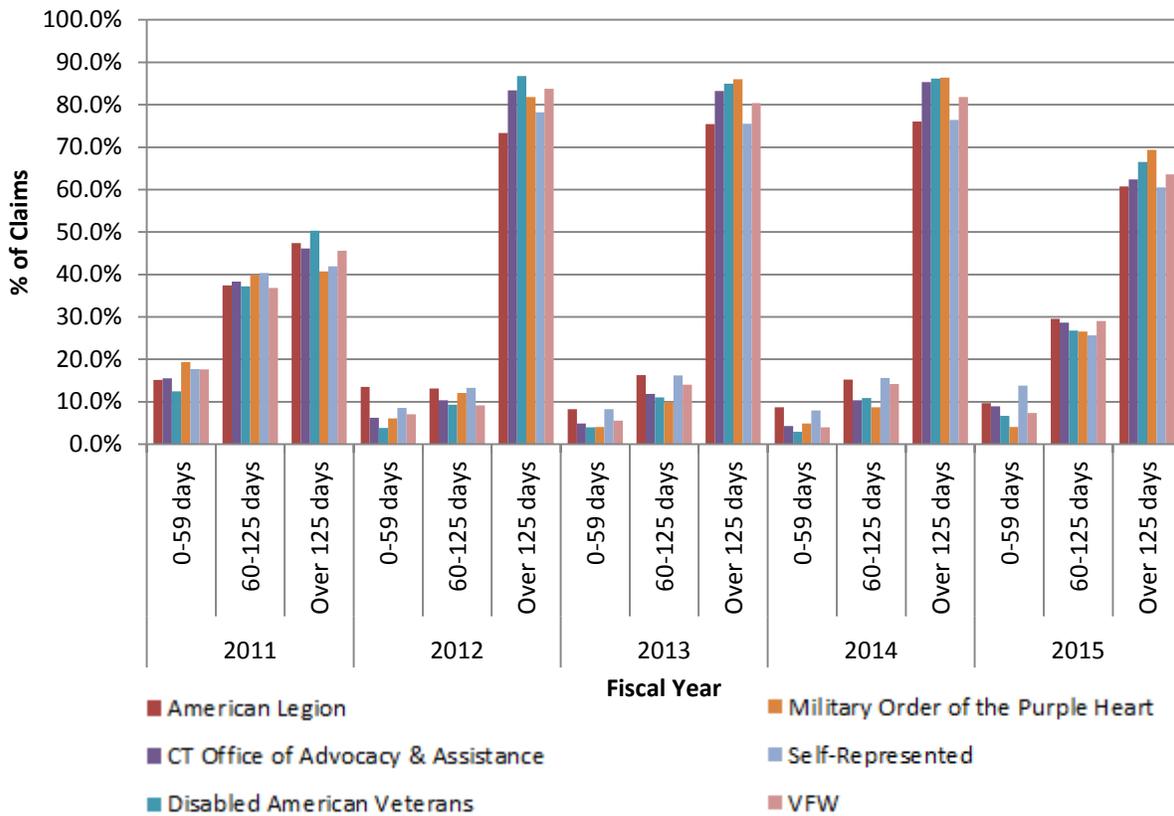
Sources: PRI staff analysis of Veterans Benefits Administration Business Intelligence data; Connecticut veterans services organizations.

OAA service officers had the lowest average annual compensation caseloads when compared to the other four primary service organizations in Connecticut. It should be noted, compensation claims is not the only activity OAA service officers engage in and, in comparison, other service organizations may have less additional duties outside of compensation claims. Nevertheless, these caseload numbers (which indicate an average of 9 claims per month filed by each OAA VSO) raise questions when compared to significantly higher caseloads in other organizations. Caseload volumes should be measured periodically by OAA as one way of monitoring its own performance. Committee staff understands no definitive conclusion can be made without additional analysis to more fully understand the variables behind these differences in average caseloads.

VA Completion Timeframes. Figure III-2 below shows the proportion of compensation claims settled by the VA by date range (0-59 days, 60-125 days, and over 125 days³⁷) of the top six forms of representation. For example, for each year, the percentage of OAA claims settled in less than 60 days, 60-125 days, and over 125 days add up to 100 percent. While this measure does *not* show OAA’s internal processing times, as PRI staff would have preferred, it does show *OAA’s compensation claims are being completed by the VA within similar timeframes as the claims submitted by other forms of claim representation.* If OAA’s claims had been taking the VA longer to process than claims by other organizations, this could have helped explain OAA’s lower claims numbers, however, this is not the case.

³⁷ 125 days is the VA’s official time limit before a claim goes into backlogged status.

Figure III-2: VA Duration of Compensation Claims by Representation FY11-FY15



Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

Regardless of representation, a significant increase in the backlog in VA claims taking more than 125 days can be seen beginning in 2012 – with more than 70 percent of all claims being backlogged. This delay is attributed to veterans returning from Iraq and Afghanistan and new federal regulations adopted in 2010 making it easier for Vietnam War veterans to receive compensation for Agent Orange-related health issues.³⁸ In addition, in 2009 the VA began to reform the disability rating system, which has not been comprehensively revised since it was created at the end of World War II. The revision involves a systematic and comprehensive review of current medical information with panels of experts in 15 areas of health, including mental disorders, infectious diseases and the respiratory system and is not expected to be completed until 2016.³⁹

³⁸ Vogel, Steve. “VA Struggling with Disability Backlog” *Washington Post*, 1/30/12.

³⁹ *Ibid.*

As of FY 15, the reduced VA backlog is reflected by a reduced number of cases being settled over 125 days and an increase in the number of cases settled between 60-125 days. Two of the VA initiatives attributed to reducing the backlog through increased efficiencies – fully developed claims and electronic submission of claims – are discussed below.

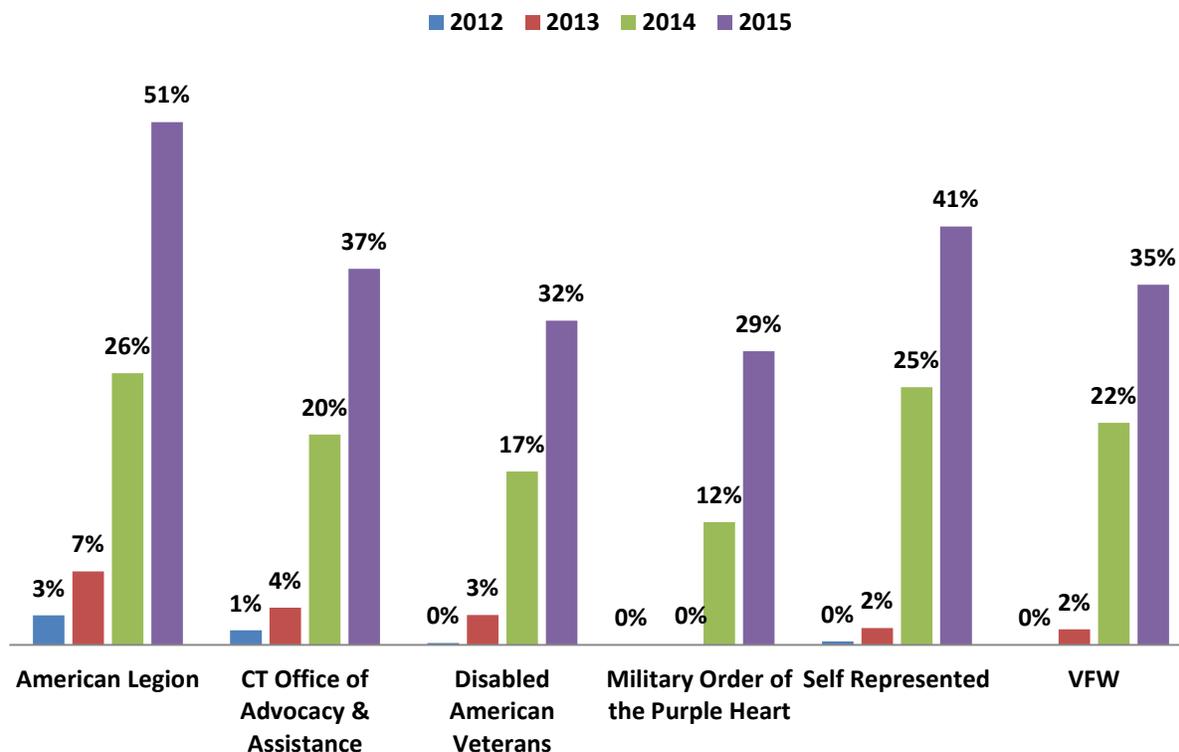
Fully Developed Claims. As noted in Chapter I, in June 2010, the VA created an optional initiative, called the Fully Developed Claims program, offering veterans and their eligible family members faster decisions from the VA on compensation, pension, and survivor benefit claims. The VA can typically decide on FDCs in half the time it takes for a traditionally filed claim.⁴⁰

To further encourage use of the program, the VA announced an incentive for fully developed claims submitted from August 6, 2013, through August 5, 2015. Successful original claims resulted in an extra year's worth of compensation, beginning one year prior to the date of filing.⁴¹ Although the incentive of an extra year's worth of benefits expired in August, the FDC process still offers a faster claim decision. Figure III-3 below shows the increased utilization of fully developed claims between FY 12 to FY 15 by accredited representatives.

⁴⁰ VA Office of Public and Intergovernmental Affairs news release, "New Technology in Place for Electronic Submission of Veterans' Disability Claims" June 18, 2013.

⁴¹ Only original claims qualify for retroactive payments. Supplemental claims for those already receiving disability pay would not qualify, although fully developed supplemental claims are encouraged by the VA.

Figure III-3: Percentage of Fully Developed Claims Filed FY 12-FY 15 by Representation



Note: Percentages rounded to nearest whole number.

Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

While the number of fully developed claims filed annually is not tracked by OAA, it estimated approximately 60 percent of claims were submitted as FDC. The VA reports a lower figure - for FY 15 approximately 37 percent of all OAA compensation claims were FDC.⁴² This is below the American Legion (51 percent) as well as self-represented claims (41 percent) and therefore can and should be increased to the greatest extent possible. It should be noted that processing fully developed claims may be more labor-intensive on the service officer, who must help the client obtain and submit all required information rather than begin the claim process and shift the responsibility of obtaining information to the VA. PRI staff believes having a standard or goal relating to using the fully developed claims process, OAA service officers would be encouraged to use fully developed claims as often as possible which could result in faster claims decisions for veterans and their families. Therefore PRI staff recommends:

- 9. OAA should establish fully developed claims as its recommended method of claim submission, using a standard claim submission in only limited circumstances. OAA service officers should educate veterans and their families about the advantages of**

⁴² It should be noted the VA data does not include claims which were downgraded from the FDC process to the standard process due to missing information.

submitting a fully developed claim to encourage active client participation. An annual goal for the overall use of fully developed claims should be established and measured by OAA.

Electronic claims. Beginning in mid-2012 the VA rolled out a new electronic claims processing system called Veterans Benefits Management System aimed at reducing the growing backlog.⁴³ VBMS has been fully integrated with eBenefits, the joint VA-Department of Defense Web portal since 2013.⁴⁴ While still accepting paper claims, the VA has been urging veterans and their VSO representatives to make full use of eBenefits and its capabilities.⁴⁵

Once logged into eBenefits, veterans can choose to have an accredited VSO representative assist with their claim submission by filing an electronic power of attorney form. Instead of filling out and mailing paper forms to the VA, veterans can use eBenefits to enter claim information online using a step-by-step, interview-style application with pre-populated data fields and guided questions that help ensure complete and accurate information, similar to popular tax preparation software. The portal also allows digital images of records and supporting evidence to be uploaded, bypassing the need to physically mail in personal records and wait for confirmation of receipt.

Using the SEP companion portal, the veteran's authorized VSO representative can view the contents of the claim, track its status, and add additional information when needed. A veteran and his or her representative can even work on a claim simultaneously while both are logged into the system, enabling VSOs to assist more veterans in their homes or even remotely. eBenefits users can also track their claim status and access information on a variety of other benefits, like pension, education, health care, home loan eligibility, and vocational rehabilitation and employment programs.

Given the potential for increased service officer efficiency as well as greater convenience, access, and transparency on behalf of veterans and their family members, PRI staff requested from OAA the number of claims filed electronically each year using eBenefits, as well as the number of claims filed by paper. Neither method of filing claims is tracked by OAA. Unfortunately, the VA data provided to PRI does not differentiate between true paperless claims submitted electronically through eBenefits and paper claims scanned into SEP and digitally transferred into VBMS. Thus, as Figure III-4 depicts, OAA submitted 98.1 percent of compensation claims electronically in FY 15. Based on interviews with OAA service officers and management, however, PRI staff believes most, if not all, of OAA claims, are the latter. This is a missed opportunity for both OAA staff and the clients they serve, and PRI staff recommends:

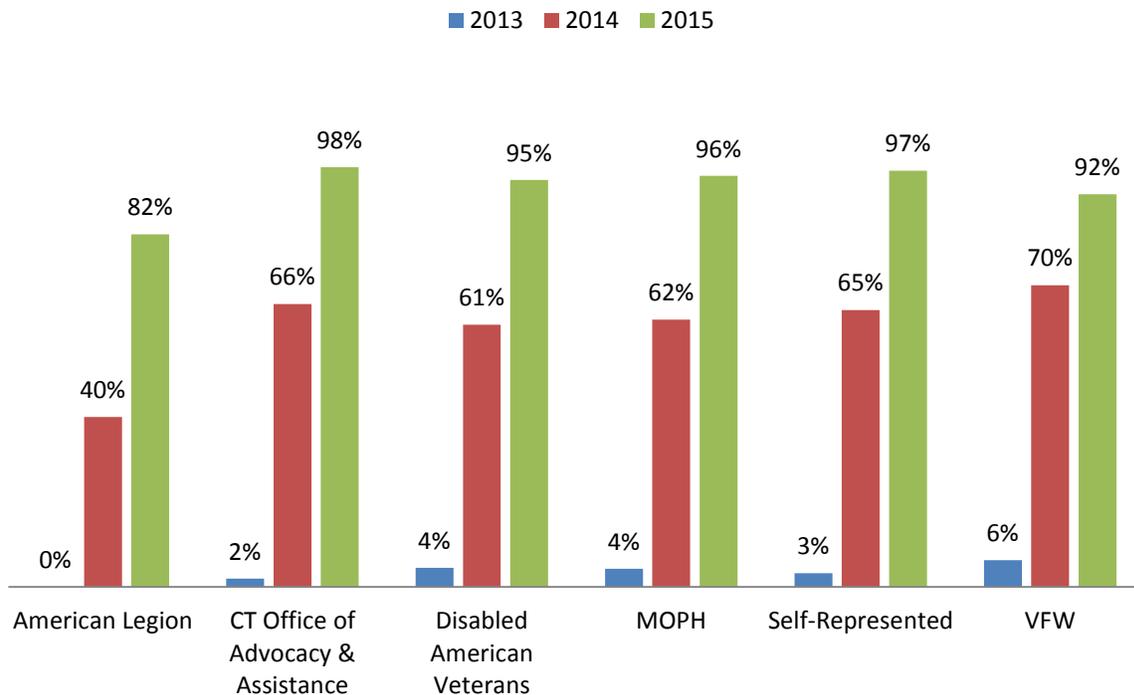
10. OAA should encourage each client to register for a free eBenefits account as part of its routine intake and claim submission process. Assistance in the registration process should be provided for any clients unable to register independently.

⁴³ Vogel, Steve. "VA struggling with disability backlog" *Washington Post*, 1/30/12.

⁴⁴ eBenefits is the result of the recommendation of the President's Commission on Care for Returning Wounded Warriors to create a Web portal that would provide service members, veterans, their families, and authorized caregivers with a single central access point to clinical and benefits information.

⁴⁵ The VA scans all new paper claims into VBMS to be processed electronically.

Figure III-4: Percentage of Electronically Submitted Claims Filed FY 13-FY 15 by Representation



Note: Percentages were rounded to nearest whole number.

Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

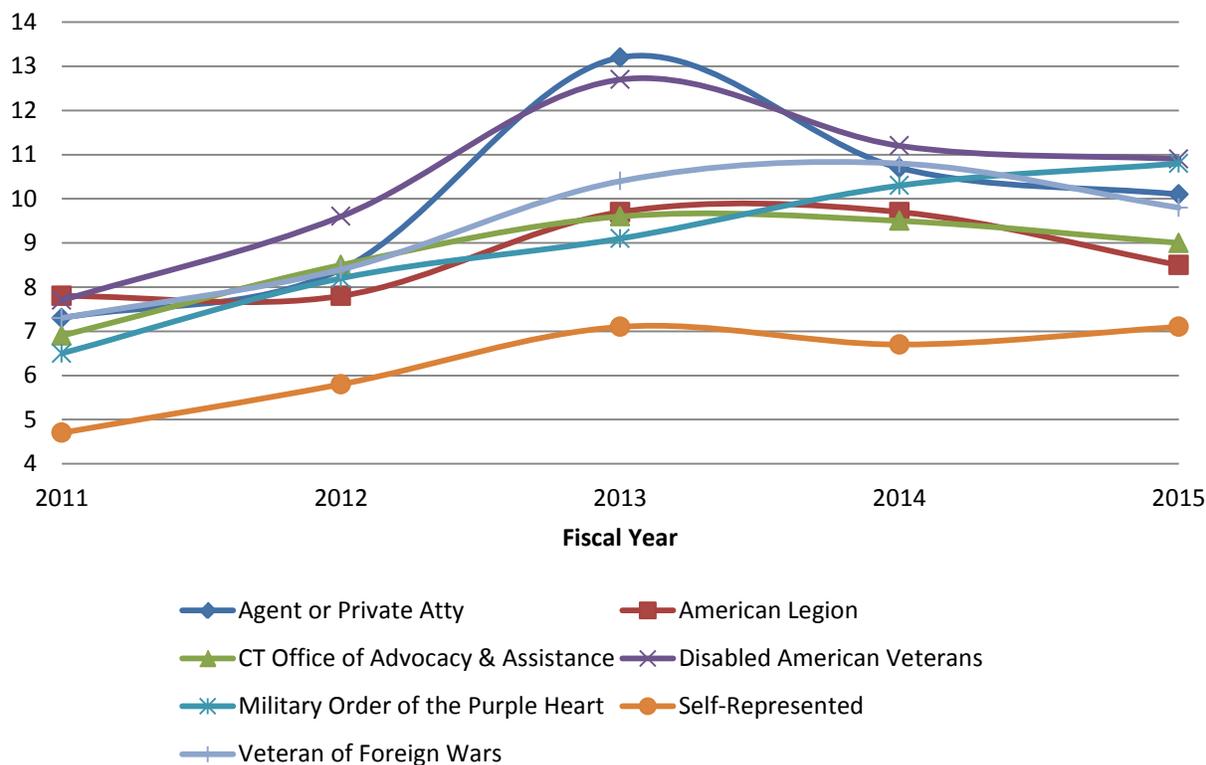
Being able to easily check on the status of their claims should mitigate many of the issues pertaining to lack of communication and frustration over the long claims process as were identified by survey respondents. Claimants need not be “tech-savvy” – for instance an adult son or daughter could use eBenefits to check on the status of a claim for a parent residing in a nursing home. This use of eBenefits, as claimants themselves could look up the same information about their pending claim as their service officer has access to, should reduce the number of status inquiries OAA service officers continually receive from claimants and thus has the potential to improve office productivity.

Complexity of claim caseload. PRI staff was interested in the complexity of OAA compensation claims compared to other service organizations and accredited professionals. A higher share of complex cases, for instance, may help to explain lower caseload volume. Committee staff requested the average number of disabilities per OAA claim, but OAA does not currently track this information. The VA tracks the number of “issues” per claim, with issues including diagnostic codes for various disabilities and other requests for benefits within a claim (aid and attendance,⁴⁶ for instance).

⁴⁶ Veterans and survivors who are eligible for a VA pension and require the aid and attendance of another person, or are housebound, may be eligible for additional monetary payment.

Figure III-5 summarizes the data with respect to the average number of issues per compensation claim for the top seven representatives. The average number of issues per claim has increased over the past five years, peaking between 2013 and 2014. In general, accredited agents and attorneys as well as Disabled American Veterans, had a higher average number of issues per claim than OAA and other representatives; self-represented claimants had the lowest number of issues per claim.

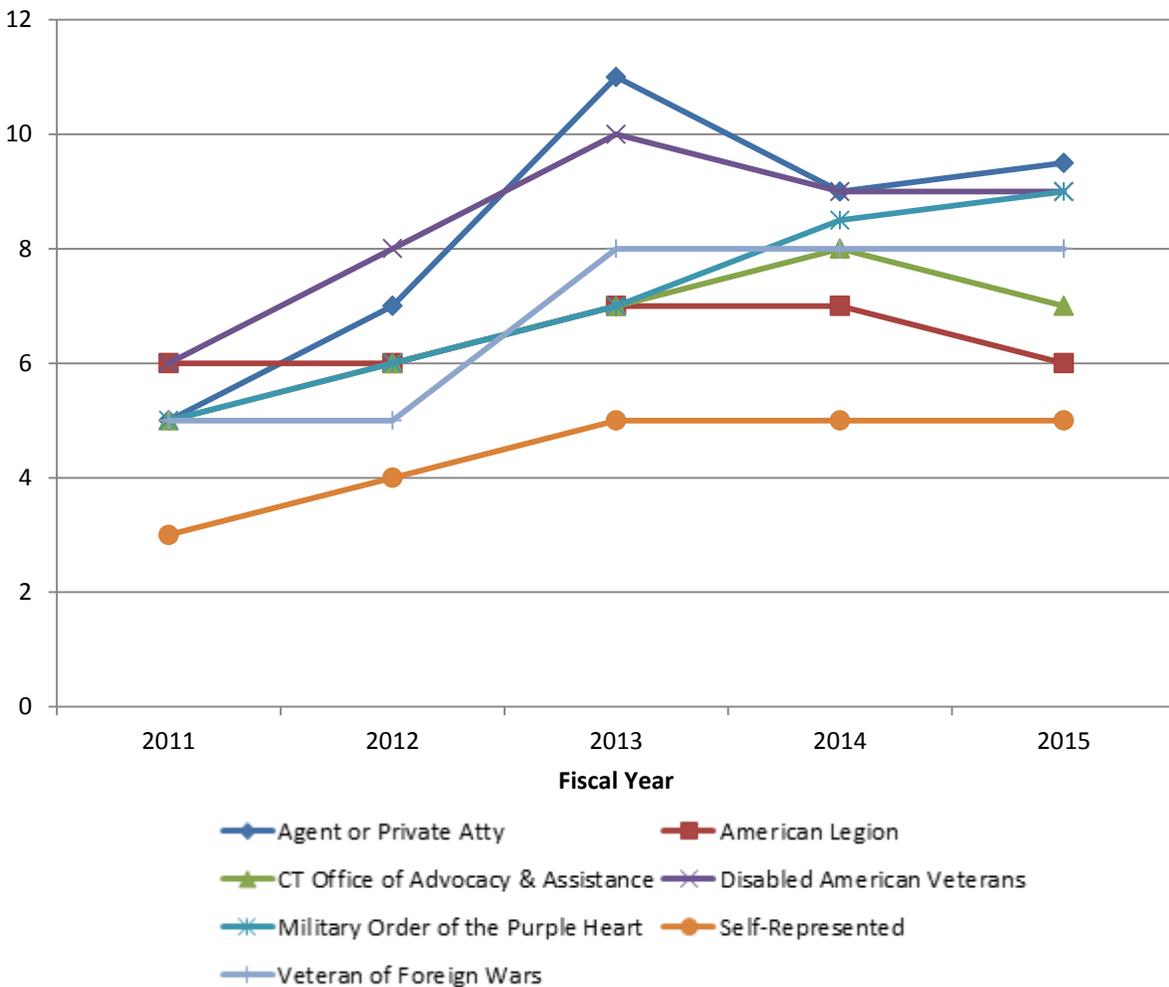
Figure III-5: Average Number of Issues Per Claim by Representation FY11-FY15



Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

This proxy for the level of complexity of OAA’s claims shows that they are mid-level in comparison to other forms of representation. Figure III-6, the median number of issues per claim, shows a similar trend, with OAA neither the highest nor the lowest in the relative complexity of its compensation claim caseload for the past five years. Had OAA’s average or median number of issues per claim been higher than DAV, for instance, PRI staff may have attributed this fact as a possible explanation for OAA’s low caseload numbers, but, that is not the case.

Figure III-6: Median Number of Issues Per Claim by Representation FY 11-FY 15



Source: Veterans Benefits Administration Business Intelligence data

Awards. Once awarded, disability compensation benefits are provided in regular ongoing monthly payments. Any benefits missed by the claimant between the date of filing his or her claim and the date it granted are provided as one-time lump sum retroactive payment. PRI staff requested information about the total annual awards granted to OAA claimants as well as the average monthly awards received for both compensation and pension claims.

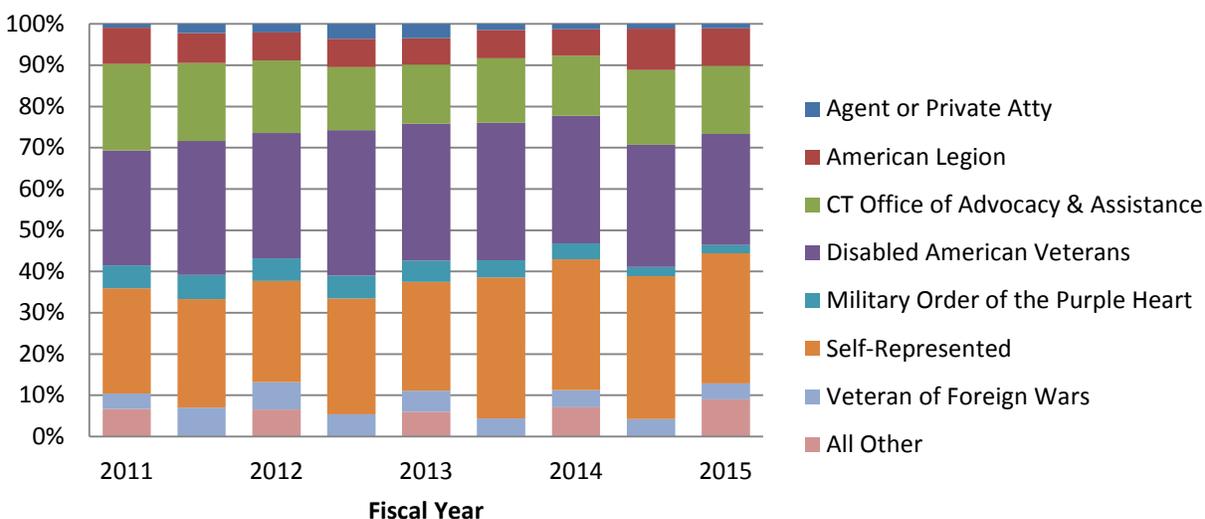
Utilizing data provided by the VA, PRI staff determined that OAA secured the following amounts in retroactive compensation payments for its clients:

- 2015: \$ 2,701,361
- 2014: \$ 2,422,820
- 2013: \$ 2,658,938

- 2012: \$ 2,548,982
- 2011: \$ 1,849,983

These amounts represent between 14.4 percent and 21.0 percent of the retroactive payments received by all Connecticut claimants over the past five years. Disabled American Veterans and self-represented claimants had higher shares, as depicted by Figure III-7 below. This is at least attributable to the fact that these two groups have higher volumes of claims than OAA. Furthermore, higher retroactive payments could be due to longer claim processing times; as discussed earlier in terms of the duration of VA claims processing, that does not appear to be the case – statewide claims were being completed within similar timeframes regardless of the form of representation.

Figure III-7: Share of Retroactive Compensation Payments Awarded by Representation FY 11-FY 15



Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

The VA provided average and median monthly compensation payments for Connecticut recipients by representation as well as the state as a whole as summarized in Tables III-2 and III-3, with below average results highlighted. *The only group for which monthly compensation awards were consistently below the state average was self-represented claimants. This was also the case for median monthly awards by self-represented claimants.* This raises questions as to whether or not these claimants may have recouped higher award amounts with the assistance of an accredited professional.

Table III-2: Average Monthly Compensation Award by Representation vs. State Average FY11-FY15

	2011	2012	2013	2014	2015
	\$				
CT State Average	1,044	\$ 1,137	\$ 1,258	\$ 1,223	\$ 1,185
Agent or Private Attorney	\$ 1,198	\$ 1,227	\$ 1,326	\$ 1,436	\$ 1,118
American Legion	\$ 1,380	\$ 1,506	\$ 1,437	\$ 1,453	\$ 1,306
CT OAA	\$ 1,182	\$ 1,280	\$ 1,369	\$ 1,427	\$ 1,267
Disabled Amer. Veterans	\$ 1,160	\$ 1,274	\$ 1,445	\$ 1,393	\$ 1,319
MOPH	\$ 959	\$ 1,151	\$ 1,321	\$ 1,337	\$ 1,282
Self-Represented	\$ 740	\$ 825	\$ 975	\$ 910	\$ 970
VFW	\$ 1,018	\$ 1,233	\$ 1,124	\$ 1,247	\$ 1,282

Note: Results below the state average are highlighted.

Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

Table III-3: Median Monthly Compensation Award by Representation vs. State Median FY11-FY15

	2011	2012	2013	2014	2015
CT State Median	\$ 674	\$ 808	\$ 1,026	\$ 1,026	\$ 1,016
Agent or Private Attorney	\$ 985	\$ 1,062	\$ 1,120	\$ 1,143	\$ 1,041
American Legion	\$ 974	\$ 974	\$ 1,026	\$ 1,096	\$ 939
CT OAA	\$ 973	\$ 1,009	\$ 1,189	\$ 1,136	\$ 1,059
Disabled Amer. Veterans	\$ 795	\$ 1,009	\$ 1,195	\$ 1,136	\$ 1,067
MOPH	\$ 541	\$ 992	\$ 1,026	\$ 1,120	\$ 1,057
Self-Represented	\$ 421	\$ 541	\$ 797	\$ 611	\$ 651
VFW	\$ 571	\$ 974	\$ 1,009	\$ 1,041	\$ 1,054

Note: Results below the state average are highlighted.

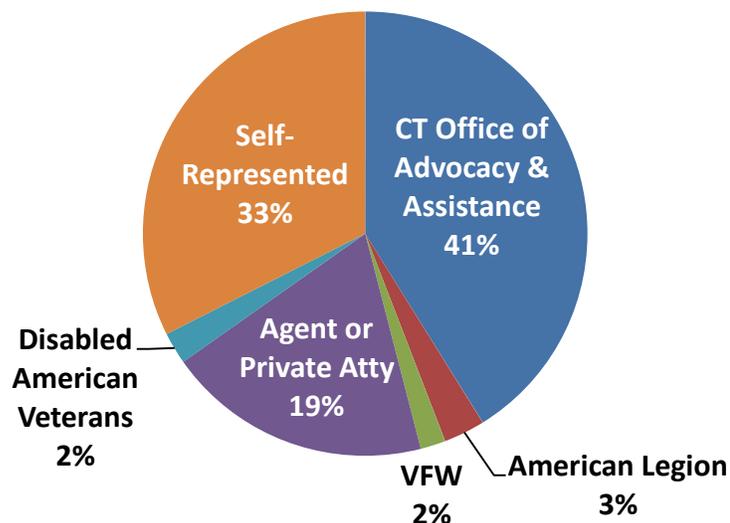
Sources: PRI staff analysis of Veterans Benefits Administration Business Intelligence Data

Pension Benefits

Caseload. *The Office of Advocacy and Assistance handled the largest share (41 percent) of Connecticut pension claims (veteran and survivor) for FY 15. As Figure III-8 depicts, this is followed by pension claims without accredited representation (33 percent) and claims handled by an accredited agent or attorney (19 percent). While other veteran service organizations may have clients in nursing homes, OAA's lead in this category of veterans' benefits is likely attributed to its advocacy charge under state law to visit nursing homes throughout the state to ensure veterans and their dependents are receiving the maximum benefits to which they are entitled.⁴⁷ Self-represented claimants submitted the second largest share (33 percent) of pension claims in FY 15.*

⁴⁷ C.G.S. Sec. 27-102l(c)(2).

Figure III-8. Connecticut Pension Claims by Representation (FY15)



N = 598

Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

As with compensation claims, any analysis of caseload should also be viewed in the context of VSO staffing levels of these organizations. PRI staff calculated the average annual pension caseload for each, with the results listed below in Table III-4.

Table III-4: Average Annual Volume of Pension Claims Completed Per VSO for FY 15

Selected Veteran Service Organizations / # VSOs	Average Caseload / VSO
American Legion (2.5 VSOs)*	10
Disabled American Veterans (3 VSOs)	11
Veterans of Foreign Wars (VFW) (1 VSO)	23
CT Office of Advocacy & Assistance (OAA) (8 VSOs)	43

Notes: Service organizations selected are the only service offices co-located with the VA's Hartford Regional Benefit Office with appreciable pension claims in FY 15. As a result, Military Order of the Purple Heart is not included. Numbers of VSOs is a point-in-time figure and does not account for any long-term leaves of absence or any other factors possibly affecting output.

* Includes 1 VSO who works part-time as a volunteer for American Legion.

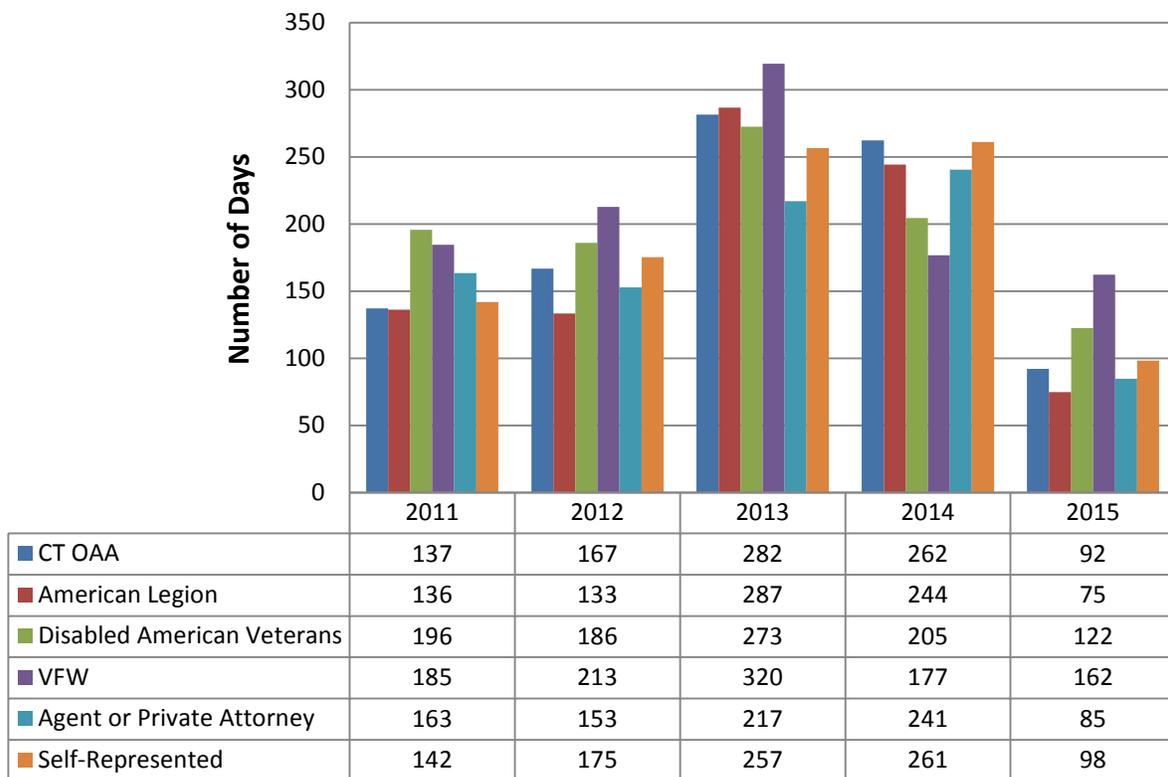
Sources: PRI staff analysis of Veterans Benefits Administration Business Intelligence data; Connecticut veterans service organizations.

Not surprisingly, given their high share of state pension claims, OAA service officers had the highest average annual pension caseloads – 43 claims each - when compared to the other three primary service organizations in Connecticut. While higher pension claims activity helps

explain OAA’s low compensation claims numbers, PRI staff believes 43 additional claims each year - or just under 4 claims per VSO a month – is itself an insufficient reason for the gap between OAA compensation caseloads and the significantly higher compensation caseloads in other organizations.

VA Completion Timeframes. Figure III-9 below shows the average number of days for the VA to complete pension claims by the top six forms of representation. As seen with compensation claims, processing times peaked in 2013 at the height of the VA backlog of claims. This appears to be resolved as FY 15 average completions are the lowest in the five-year period, regardless of representation.

Figure III-9: Average Days for VA to Complete Pension Claims by Representation for FY 11-FY 15



Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

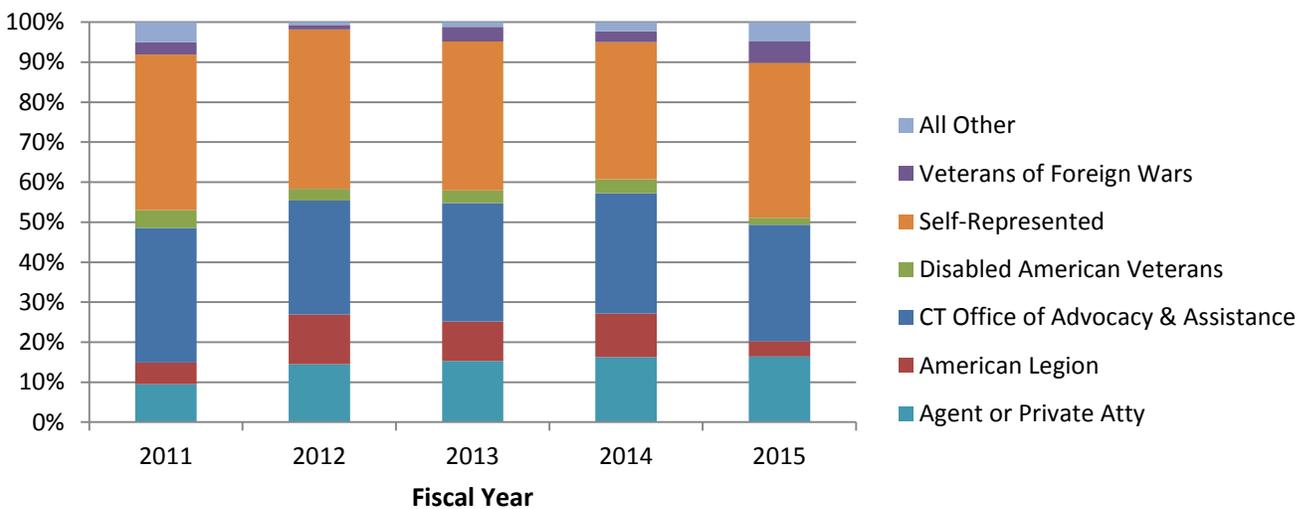
As discussed previously, this measure does *not* show OAA internal processing times, as PRI staff sought, but does show *OAA pension claims are being completed by the VA within similar timeframes as the claims submitted by other forms of claim representation.*

Awards. From VA data, PRI staff determined that OAA secured the following amounts in total retroactive pension payments for its veteran and survivor clients:

- 2015: \$339,306
- 2014: \$727,941
- 2013: \$489,694
- 2012: \$533,290
- 2011: \$778,257

These amounts represent between 29 and 34 percent of the retroactive payments received by Connecticut claimants over the past five years. Only self-represented claimants had a higher share, between 34 and 40 percent, as depicted by Figure III-10 below. This is in part attributable to this group having a higher volume of claims than OAA. Furthermore, higher retroactive payments could be due to longer claim processing times; however, as discussed earlier in this chapter, the data on VA processing durations does not support this potential explanation.

Figure III-10: Share of Retroactive Pension Payments by Representation FY 11-FY 15



Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

The VA also provided average monthly pension payments for Connecticut recipients by representation and the state as a whole (see Table III-5). OAA and Disabled American Veterans were the only groups consistently below the state average each year for FYs 11-15. Self-represented claimants as well as those represented by accredited agents or attorneys, the American Legion and VFW exceeded the state average monthly awards.⁴⁸

⁴⁸ With two exceptions – in FY15 self-represented and VFW claims were below the state average.

Table III-5: Average Monthly Veterans Pension by Representation vs. State Average FY 11-F Y15

	2011	2012	2013	2014	2015
CT State Average	\$969	\$1,010	\$1,103	\$1,047	\$1,133
Agent or Private Attorney	\$1,399	\$1,582	\$1,531	\$1,636	\$1,509
American Legion	\$1,398	\$1,165	\$1,175	\$1,198	\$1,382
CT OAA	\$776	\$770	\$844	\$805	\$963
Disabled Amer. Veterans	\$953	\$999	\$1,003	\$613	\$628
Self-Represented	\$1,038	\$1,035	\$1,163	\$1,102	\$1,119
VFW	\$1,147	\$1,797	\$1,194	\$1,290	\$453

Note: Results below the state average are highlighted.

Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

To qualify for a pension benefit, a claimant’s annual income must be less than the amount set under federal law. If eligible, the pension benefit is calculated as the difference between the veteran or survivor’s countable income and the annual pension limit. Thus, it is possible that OAA pension payments are lower because they serve a population with higher countable income, or less unreimbursed medical expenses, which are used to reduce countable income. Conversely, OAA’s lower-than-average monthly awards could reflect that its claimants are not receiving the maximum pension benefit to which they may be entitled. As neither OAA nor the VA currently collect and track the income level of its claimants, it cannot be determined whether OAA’s performance in this area could be improved. Tracking client income level would help OAA determine the reason for these lower monthly awards in the future.

Resolved Appeals

As outlined in Chapter I, the VA regional benefit office may grant a claim, grant a partial claim, or deny a claim. Nationally, VA initial grant (i.e. approval) rates for disability claims are currently at 65 percent, which is on par with historical averages.⁴⁹ Veterans, their dependents, and their survivors have an unqualified right to appeal any decision made by the VA for any reason within one year. Alternatively, a claimant may reopen a claim where the VA has issued a decision, by submitting new and material evidence.

Appeals of compensation claims represent the bulk of the Board of Veterans’ Appeals work (94.8 percent in FY14).⁵⁰ For the past 20 years, an average of 11 to 12 percent of the VA’s claims decisions was appealed each year. Of those appeals, approximately 72 percent are from veterans already receiving disability compensation payments, but seeking either a higher level of compensation or payment starting from an earlier date. Nationwide, the largest number of appeals is generated from Vietnam era veterans. Of note, OAA veteran service officers may represent claimants before the Board of Veterans’ Appeals, but are not involved in higher levels of appeal.

⁴⁹ U.S. Department of Veterans Affairs, “The Veterans Appeals Process” February 28, 2014.

⁵⁰ U.S. Department of Veterans Affairs, Board of Veterans’ Appeals Annual Report, Fiscal Year 2014.

Since 1933, the appeals process established by law has grown in complexity.⁵¹ The VA is obligated to evaluate the veteran's most current disability status, which is constantly evolving. As outlined in Figure I-1, the multi-stage, non-linear appeals process includes a continuous open record – allowing submission of new evidence at any time. This differs from a traditional judicial appeals process where the record is closed at the time of the initial decision. As a result, each piece of new evidence requires a new decision.⁵² By law, the Board must remand the appeal back to the regional benefit office to review or gather any new evidence that can influence the appeal and start the review cycle all over.

Less than half of appealed decisions (appeals typically account for 4 to 5 percent of all claims decisions) are “Certified” and transferred to the Board for a final agency decision. Of the appeals that continue to BVA, approximately 25 percent of claimants request a formal hearing before a Veterans Law Judge to discuss their appeal and present new evidence. Teleconference hearings are another option. In FFY 13, an appeal in which VBA issued only one supplemental decision took, on average, 562 days to complete. Thereafter, each additional decision added, on average, more than 200 days to the total process time.⁵³

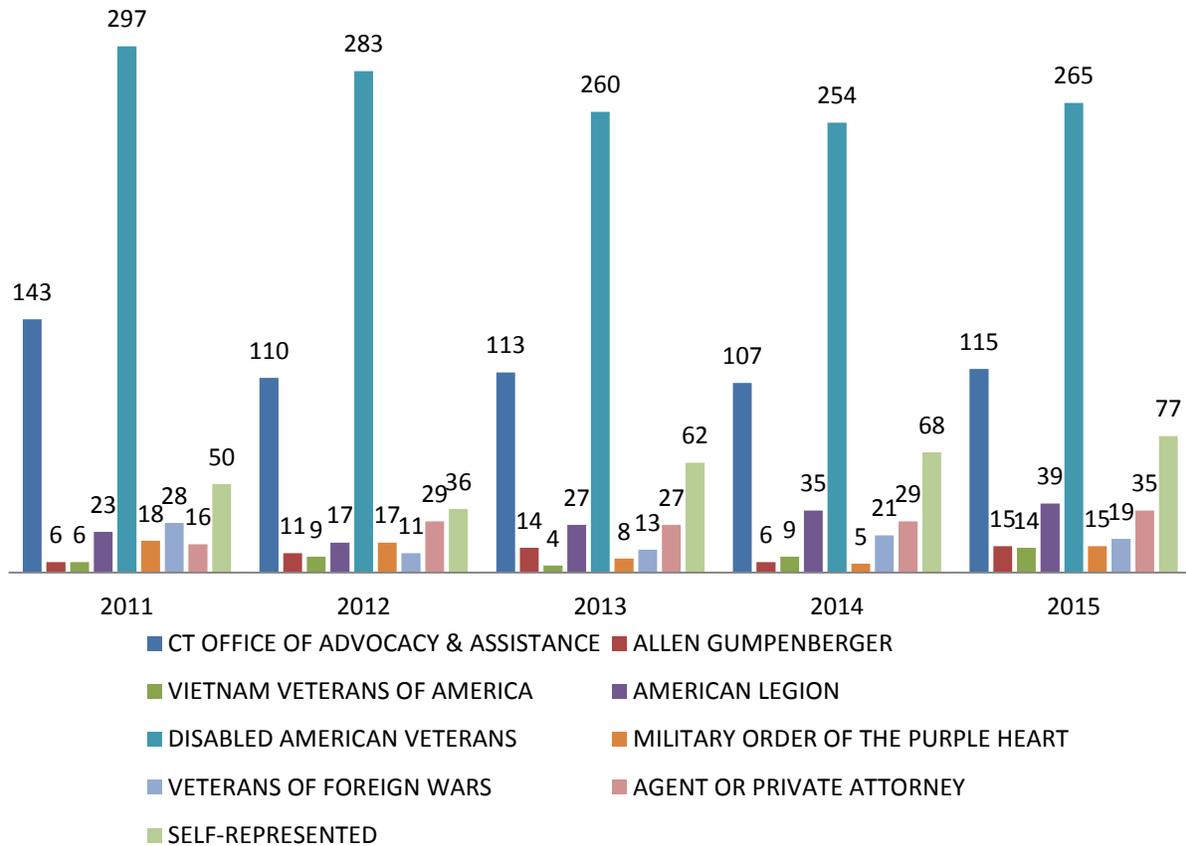
A total of 2,886 appeals for claimants in Connecticut were resolved in FYs 11-15. For FY 15 only, 633 appeals were resolved by VBA with an additional 1,903 appeals still pending a decision. Figure III-11 shows the representatives with the highest volume of Connecticut appeals for the past five years. Disabled American Veterans consistently had the highest volume of appeals, followed by the Office of Advocacy and Assistance. Veterans representing themselves had the third highest volume of appeals.

⁵¹ The Board of Veterans' Appeals was created in 1933 to provide appellate review of benefits decisions.

⁵² U.S. Department of Veterans Affairs, “The Veterans Appeals Process” February 28, 2014.

⁵³ Ibid.

**Figure III-11. Resolved VBA Appeals by Representation
FY 11- FY 15**

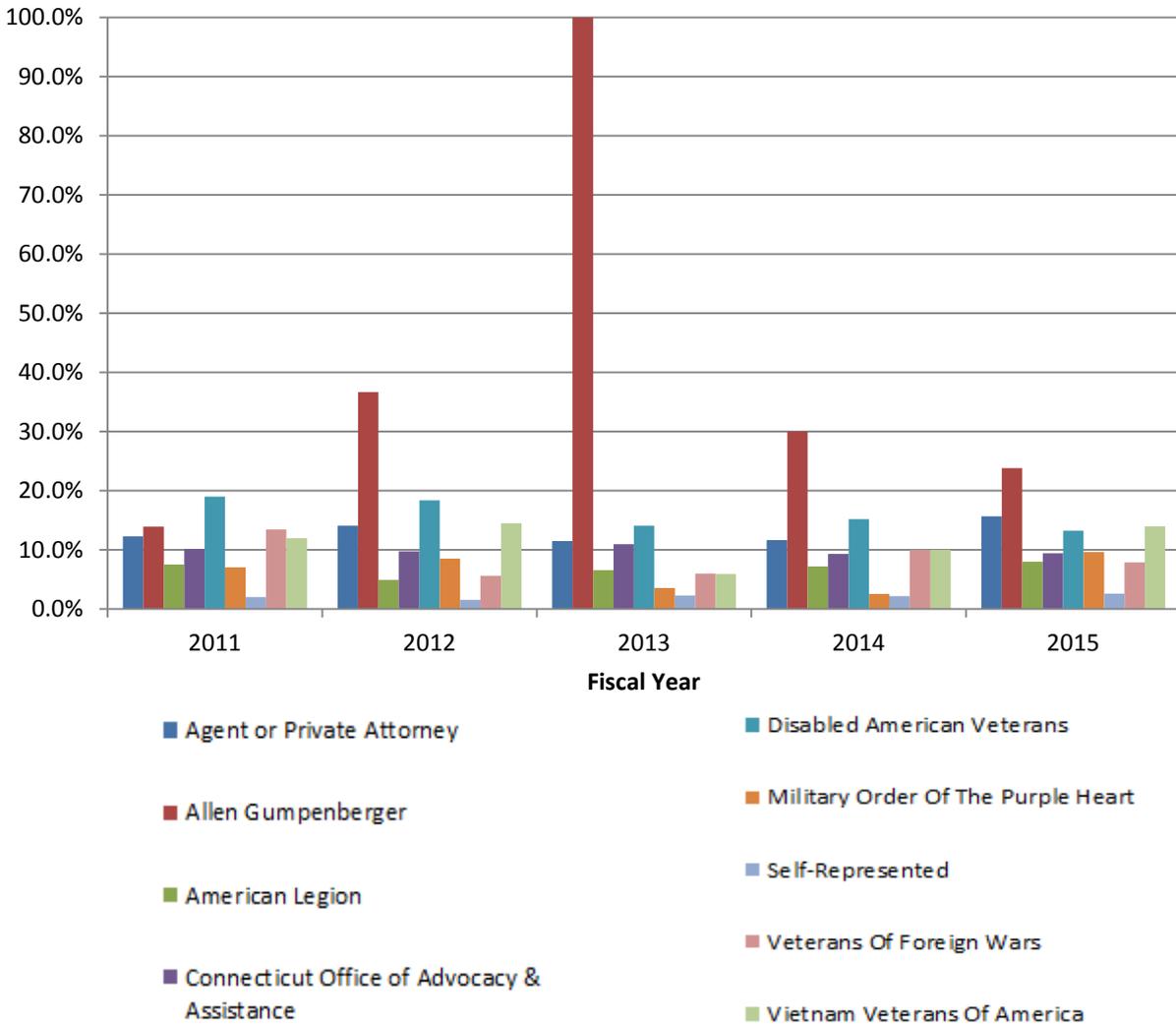


Note: Allen Gumpenberger is a private attorney who leads a national veterans assistance business, with clients in Connecticut.
Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

How does OAA’s appeal rate compare to the consistent national average of 11 to 12 percent of the VA’s claims decisions being appealed each year? The VA data provided only half of the answer as it reports on resolved appeals and only aggregates pending appeals. While this precludes comparisons to the national average, comparisons within state do provide some information about the volume of appeals activities.

As depicted in Figure III-12, OAA’s annual resolved appeals for the past five fiscal years ranged from a low of 9.3 percent of filed claims in FY 14 to a high of 10.9 percent in FY 13. These numbers exclude appeals still pending a final decision, though, so OAA’s total appeal rate is inevitably higher. Resolved appeal rates for agents and attorneys as well as Disabled American Veterans were above OAA’s rate during the same time period. Self-represented claimants had the lowest rates of resolved appeals – ranging from 1.5 percent to 2.6 percent. This could be due to the fact that these claimants chose to enlist the help of an accredited representative once they received an unfavorable decision from the VA, and therefore their subsequent resolved appeal would be credited to a professional.

Figure III-12: Percentage of Annual Claims with Resolved Appeals FY 11- FY 15



Note: Does not include appeals still pending a decision, as these were not broken out by year filed. Resolved appeals for Allen Gumpenberger in 2013 totaled 14 out of 8 filed that year, or 175%. This is likely due to the fact that he took on additional clients at the appeal phase.

Source: PRI staff analysis of Veterans Benefits Administration Business Intelligence data.

Without a case-by-case analysis, PRI staff cannot conclude whether a lower-than-average appeal rate indicates good OAA performance. Was the reason for appeal valid or did the veteran wish to appeal against OAA advice? What was the denial reason, for example, was paperwork missing from the claim? Did the claimant transfer his or her appeal to another accredited representative? These are the types of questions that would need to be answered for further analysis of OAA performance in regards to claims appeals. One conclusion that can be drawn, however, is the OAA’s low average caseloads are not likely the result of higher than average activities on appeal.

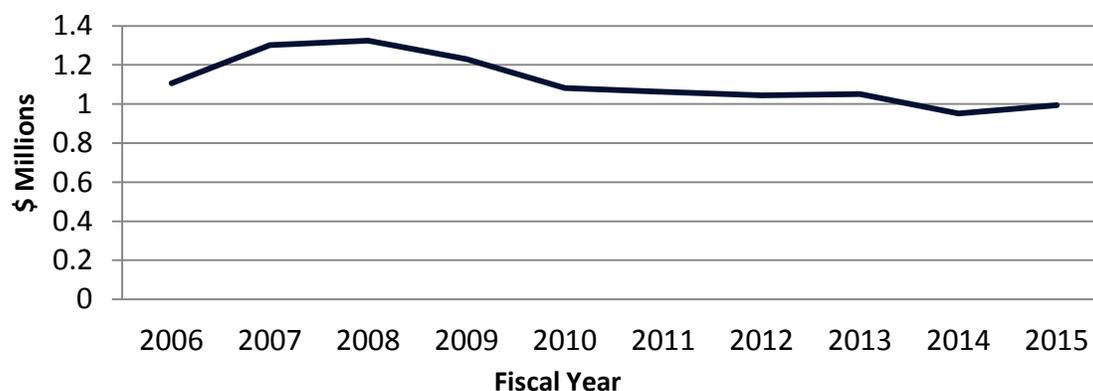
OAA Internal Operations

As this chapter will discuss, OAA operations are not performance-oriented. PRI staff examined the overall efficiency of OAA's internal operations and identified several areas with deficiencies, some of which OAA has recently begun to address. This chapter outlines OAA's internal processes as well as barriers in terms of the adequacy of its resources - budgetary, managerial support, human and material resources, training and professional development, quality assurance, and accessibility.

Budget

Figure IV-1 highlights the total operating expenditures for OAA for FY 06 to FY 15 (using FY 15 dollars). Adjusted operating expenditures for OAA peaked in FY 08 at \$1.3 million but have since declined by 25 percent. The FY 15 OAA operating budget was just over \$993,000, or roughly 3 percent of the total budget for the Department of Veterans' Affairs. Almost all (97 percent) of OAA's expenditures were for staff compensation (i.e., Personal Services), with the remaining 3 percent used for Other Expenses.⁵⁴

Figure IV-1: Office of Advocacy and Assistance Expenditures: FYs 06-15 (in FY 15 dollars)



Source: PRI staff analysis of Department of Veterans' Affairs data.

OAA has cut virtually all spending wherever and as much as possible, often with negative consequences. As discussed further in this chapter, reduced or flat state funding has resulted in delayed technological upgrades, lack of professional training, moving to rent-free, but in some instances less accessible office space, and even reduced mailings due to lack of postage costs - impacting OAA's operations. With poor economic forecasts ahead, there does not appear to be additional state funding in the future. Yet given its close relationship with the federal VA, PRI staff finds *OAA is over reliant on state funding with no emphasis on pursuing federal grant*

⁵⁴ "Other Expenses" is a state budget classification that encompasses an agency's non-personnel expenditures, such as utilities (e.g., electricity, heating oil, natural gas, water), fleet, repairs, and maintenance.

opportunities. According to interviews with the Department of Labor's veteran employment unit, federal grant opportunities for veterans services are abundant. PRI staff, therefore, recommends:

- 11. The Connecticut Department of Veterans' Affairs should annually explore potential federal grant opportunities that may be suited for the Office of Advocacy and Assistance. In doing so, DVA should seek collaboration with other relevant state agencies whenever possible.**

As the department recently hired a special projects coordinator, this should be a logical extension of his or her established duties.

Administration and Managerial Support

The OAA manager, based at the department's headquarters in Rocky Hill, is responsible for all five district offices throughout the state, making direct supervision challenging. To assist in oversight, the office previously had a Veterans Services Supervisor; however, the position has not been refilled since FY 07. Instead, the manager relies on weekly itineraries e-mailed by the service officers to monitor their whereabouts and activities. DVA is now in the final phases of hiring a field supervisor for the first time in nearly a decade. The department plans to utilize the supervisor to handle the day-to-day operations of the office including technical support. This should allow the manager to re-focus his attention on higher level planning, data collection and analysis, and performance monitoring.

A new field supervisor to travel regularly among district offices will not entirely solve the issues inherent with the office's decentralized structure. Through a review of several years' worth of weekly itineraries, committee staff finds *the existing weekly itinerary system is inconsistently used by service officers and typically too vague to be a useful management tool*. Furthermore, the reported client meetings and outreach activities noted in the itineraries are never tallied or compiled for future reference.

As previously discussed, OAA's case management system, VIMS, has the capability to collect and track certain claims activity information relevant for monitoring office productivity and performance but is not being utilized for this purpose. As a result, OAA is reliant upon data produced by the federal VA system for any measure of its own performance. While monitoring the status of OAA claims within the VA system is an important part of OAA's duties, OAA can and should be monitoring its own internal activities as well. For instance, PRI staff requested from OAA the average number of days it takes to complete a compensation claim, defined as the period between initial client contact and claim submission to the VA. OAA provided VA processing times instead. Upon follow-up OAA acknowledged it does not track its own processing times nor does it have any standards related to processing time. Building on the previous chapter's recommendations pertaining to OAA's deficiencies in data collection and information management, committee staff recommends:

- 12. OAA should establish a formal data development plan to address its extensive internal data weaknesses. Current data deficiencies should be inventoried (e.g., unavailable, incomplete, poor quality). Key performance measures should be developed taking into account input from OAA service officers and administrative**

staff. This plan should be submitted to the DVA Commissioner and Board of Trustees no later than June 30, 2016.

When PRI staff asked service officers how they are evaluated, many - even senior staff - were unsure or unaware of any measures being used. A few recalled discussing the number of new claims they handled for the past year as part of their evaluation, but thought this was an unfair measure of their workload as it does not capture re-opened claims, appeals, or other advocacy or outreach activities. As discussed in Chapter II, this is supported by the fact that three out of four of OAA's disability compensation claims were supplemental rather than new/original in the past five fiscal years. When PRI questioned OAA regarding what measures are used to evaluate staff, it was acknowledged that the number of each service officer's new claims was the primary measure even though it was not considered the truest measure of the work that VSOs do. *Without performance standards or achievement goals, the productivity among service officers and district officers can be inconsistent, with certain officers handling higher workloads than others.*

It should be noted that numerous obstacles have made OAA performance management challenging in the past. Budget cuts and delays in refilling vacancies, particularly the loss of the field supervisor position in 2007, have resulted in the OAA manager having to focus more on day-to-day operations than long-term strategic planning, office performance, and oversight. As OAA is fully staffed in several offices and close to filling the field supervisor position the manager should now be able to fully focus on the critical and overdue task of monitoring office performance. PRI staff therefore recommends:

13. OAA should establish office-wide performance standards and achievement goals for both veteran service officers and administrative support staff. These measures should be incorporated into a data management system, whether by more fully utilizing the capabilities of VIMS or establishing a different tracking system, to assess staff progress on a monthly and annual basis. Quarterly reports based on key performance measures should be developed by OAA and submitted to the department's commissioner and Board of Trustees.

Human Resources

OAA personnel currently consists of one office manager, seven veterans services officers, one VSO trainee, and just over seven administrative staff (including two part-time clerk typists counted as one full-time administrative position). Overall, there has been relatively little change in position count for FYs 06-15, although staffing is at its highest level since FY 09. Figure IV-2 shows the number of veterans services officers within the Office of Advocacy and Assistance - typically eight or nine for the period examined.

Figure IV-2. Office of Advocacy and Assistance Staffing Levels, FYs 06-15



Source: PRI staff analysis of Department of Veterans' Affairs data.

Currently, three of OAA's five district offices have one service officer each, plus additional administrative staff. The Newington office has one VSO, a VSO in the Milford office recently resigned, and one staff person in the Norwich office was recently hired as a Connecticut Careers Trainee (CCT) (i.e., is working toward becoming a VSO). Veterans – as a percentage of the state's total veteran population – are evenly distributed across district office service areas (approximately 20 percent each in three districts) with two exceptions, districts 2 (28 percent) and 4 (14 percent).

Veterans services officers belong to the P-2 Social and Human Services collective bargaining unit. For FY 15, service officers could earn an annual salary of \$60,849 to \$77,596.⁵⁵ According to the official job description, a candidate for the position of Veterans Services Officer must have a minimum of five years of technical experience in social or health care service programs involving direct client contact. College training may be substituted for this required experience, up to a maximum of four years for a bachelor's degree. Thus a college graduate would be required to have one year of experience in social or health care service programs with direct client contact. Candidates must also have basic knowledge of the various factors influencing the behavior and health of veterans and their families, relevant state and federal laws, as well as community resources for veterans. As discussed in Chapter I, all service officers must be veterans themselves, with at least one who is a woman responsible for addressing the concerns of female veterans, and at least two who are bilingual in English and Spanish.

Despite these entry-level professional series job requirements, VSO vacancies have consistently been under-filled by Connecticut Careers Trainees with less rigorous requirements – no more than the possession of a bachelor's degree. Furthermore, in August 2013 the job description for Veterans Services Officer was revised to modify its service status from competitive to non-competitive so that candidates are no longer required to take a state exam in order to be appointed. These circumstances seem to indicate problems with recruiting enough candidates with the skills and experience needed to successfully fulfill the role of VSO.

⁵⁵ P-2 SH-22 40-Hours Salary Plan, Effective 07/01/2015.

In more than one PRI interview with external stakeholders, the topic of OAA recruitment was discussed and current VSO job requirements – particularly the need for a social service background - were questioned. Several stakeholders thought experience working in a legal office or paralegal training program would be much more relevant to the essential VSO tasks of handling the bureaucracy and complexities of veteran benefits law on behalf of veterans and families. PRI staff concurs with this assessment and identified an existing state job classification that might be more suitable for an OAA service officer: Paralegal Specialist within the P-5 Administrative & Residual collective bargaining unit.

While the two jobs share similar pay plans,⁵⁶ the minimum required experience for Paralegal Specialist includes either: a Bachelor’s degree in legal studies and one year paralegal assistance to an attorney; an Associate’s degree in legal studies and three years of paralegal assistance to an attorney; completion of a paralegal or legal assistance certificate program and three to four years of experience; or a law degree. Therefore, PRI staff recommends:

14. The OAA Veterans Services Officer job specification should be revised to more accurately reflect the essential duties of the position as well as the most appropriate qualifications necessary for future candidates applying for consideration.

PRI staff believes making these revisions will serve several functions: 1) reducing the steep learning curve faced by new hires with no prior experience in the legal field; 2) lessen training demands given OAA’s limited resources; 3) aid in future OAA recruitment by tapping into a large candidate pool of paralegal professionals; and 4) offer alternative career paths for the job.

Training and Professional Development

In addition to VA-accreditation requirements, OAA service officers must complete 1,000 hours (approximately six months) of on-the-job training prior to applying for national accreditation. This training is to be done under direct supervision of an accredited VSO at a district office and must cover the various aspects of processing federal benefits claims. The Office of Advocacy and Assistance requires completion of an online training course and exam administered by the National Veterans Legal Services Program (NVLSP).

In theory, this training and assessment process should be sufficient for a newly hired VSO to feel equipped to independently represent claimants before the federal VA, when in practice it typically is not. Although less emphasized by senior service officers, each with more than twenty years of experience, the insufficiency of OAA training and continuing education was perhaps the most discussed topic over the course of this study – acknowledged by internal and external stakeholders alike.

PRI staff was also made aware of instances in which aspects of required training did not occur at all. For example, the Norwich and Bridgeport district offices operated for long periods of time with only one newly-appointed veterans services officer each. The two new VSOs previously were trainees in their respective offices and were primarily not under direct

⁵⁶ For FY15, paralegal specialists could earn an annual salary of \$63,215 to \$81,807. Source: P-5 AR-22 40-Hours Salary Plan, Effective 07/01/2015.

supervision of an experienced VSO and not yet VA-accredited - receiving telephone support or physical support only upon request or the availability of more senior officers statewide or the OAA manager. In comparison, training for new service officers in several of Connecticut's larger veterans service organizations, particularly Disabled American Veterans, recognized by many as a leader in disability compensation claims, involves a formal curriculum and sending service officers for a week-long training at national venues. PRI staff recommends:

15. DVA should partner with experts in the field of veterans benefit law to identify weaknesses in the current OAA training program for newly hired service officers. Training for all new hires within OAA should be overhauled to address any identified deficiencies, including training specific to software programs such as VIMS, and formalized. A process to capture institutional knowledge should also be undertaken in advance of anticipated senior staff retirements.

Continuing education is critical for service officers, both new and seasoned, to stay abreast of the changing legal and medical landscapes involved in disability compensation benefit eligibility and adapt work processes and products if necessary. OAA was receiving training free of charge from a Disabled American Veterans supervisor until he left the organization in 2010, and this informal practice was not continued by his successor. With little to no funding to pay for training, OAA management established in-house training to be provided on a rotating basis by each district for VSOs. This has not been very successful, as service officers, in discussions with PRI staff, questioned the overall relevancy of the training. Although not mandatory, attendance at the trainings is reported to be sporadic, and several recent training sessions were cancelled for various reasons.

In the DVA commissioner's public hearing testimony to the PRI committee in September, committee staff learned of DVA's plan to contract with the Connecticut Veterans Legal Center to provide a training needs assessment and series of professional development workshops geared to addressing identified skills gaps. PRI staff spoke with the legal center's director about this, and confirmed a memorandum of understanding has been recently executed. Committee staff supports this move to provide formalized continuing education for OAA service officers, and therefore does not see the need for a recommendation in this area.

Quality Assurance

According to a field expert, it takes about two years for a new service officer to be fully competent in carrying out his or her duties in the VA claims process. PRI staff asked OAA to describe what checks and balances, if any, existed to ensure the quality of service officer work products, particularly that of newly trained personnel. For instance, is claim paperwork reviewed before submission? No quality reviews are done to gauge on-the-job performance, such as whether the best line of reasoning was used to increase the chances of a successful appeal. Without such monitoring, it can be difficult to ascertain the cause – the service officer or the VA – when delays, errors, or denials occur. Therefore, PRI staff recommends:

16. OAA should institute a standardized review process to ensure the quality of the claims being submitted by its service officers. This should include review by at least one colleague or supervisor other than the service officer originating the claim.

This cooperative review process can also serve as a learning tool as service officers are potentially exposed to other methods and styles in the work products of their colleagues.

Job Resources

Improvements in technology were a top priority for VSOs in interviews with PRI staff. Despite the shift by the VA to paperless processing systems, OAA service officers are still completing hard copies of claim application documents and scanning them one by one into a system for submission to the VA. This is due in part because service officers did not have laptop computers, portable scanners, or electronic signature pads to take with them into the field to input claims applications directly. This is no longer the case, however, as laptop computers and associated hardware were ordered for each service officer; a mobile outreach van also has been refurbished, as discussed more below. The costs for these improvements have been paid through the department's budget.

Service officers in all five district offices cited the lack of job-specific materials and equipment as a barrier to their job performance. For instance, VSOs rely on two sets of books published annually by the National Veterans Legal Service Program:

- 1) Veterans Benefit Manual (\$166 each): sample forms and briefs, flowcharts, checklists, citations to legal authorities, and other documents designed to streamline the claims process from a team of experts on the front line of veterans law; and
- 2) Federal Veterans Laws, Rules and Regulations (\$71 each) updated and indexed reference to important federal statutes and regulations contained in Title 38 of the United States Code Service (U.S.C.S.) and the Code of Federal Regulations (C.F.R.), as well as all of the rules of the United States Court of Appeals for Veterans Claims.⁵⁷

For a while, these reference materials, necessary for VSOs to fully assist and advise on federal benefit claims, had been outdated or lacking in each district office. In response to requests for updated books, OAA management cited the prohibitive cost (approximately \$2,000 for eight copies of each book) of the annually updated books and directed staff to find up-to-date information through Internet searches. It should be noted that copies of the 2014-15 Federal Veterans Law, Rules and Regulations book were ordered and recently received by OAA for distribution (one per office). In addition, each office will be designated one 2014 Veterans Benefit Manual.⁵⁸ Going forward OAA plans to order the reference books more frequently, although not every year.

PRI staff supports these recent developments to enhance the job-specific resources available to OAA service officers.

Accessibility

Ensuring clients' easy access to services is a critical component to carrying out an organization's mission. Accessibility concerns become even more significant given that OAA

⁵⁷ National Veterans Legal Services Program website: <http://www.nvlsp.org/store/>, accessed November 30, 2015.

⁵⁸ Public hearing testimony of DVA Commissioner Connelly, September 30, 2015.

primarily serves a population of veterans who are disabled and/or over the age of 65. Unfortunately, current OAA district offices locations are based on the availability of free rent rather than the convenience of clients. For example, the office in District 3 had been located one mile from the VA Healthcare facility in West Haven, until it was closed due to unhealthy working conditions. After a lengthy search the office was relocated to rent-free space in Milford - not accessible by public transportation and just eight miles away from the District 4 office in Bridgeport.

Although service officers have access to state vehicles and are able to travel to clients who are homebound or residing in nursing homes or assisted living facilities, traveling to and from offices without a central location within the district is inefficient – serving less clients and wasting more state resources to do so. According to a sample of OAA clients surveyed by PRI staff, discussed in Chapter III, most in-person meetings took place at an OAA district office (65 percent) with clients typically providing their own transportation or enlisting the help of family or friends.⁵⁹

Another area in which accessibility can be improved relates to the appeals process. The Hartford Regional Benefit Office in Newington has state-of-the-art video teleconferencing equipment and digital audio recording software for remote face-to-face hearings for video teleconference appeal hearings (by which just over half of appeals are conducted).⁶⁰ For veterans electing this option, video teleconference hearings typically can be scheduled an average of 100 days earlier than face-to-face “Travel Board” hearings; however, Newington is the only site in the state currently offering this option. Service officers and clients traveling from other district offices, namely Bridgeport, Milford, and Norwich, must commute nearly one hour each way to attend teleconferences. As a result, a service officer can easily spend half of their work day on a single appeal. PRI staff recommends:

17. The Connecticut DVA should work with the VA to establish additional sites for teleconference hearings.

For instance, teleconference hearings at the VA healthcare facility in West Haven would offer a significantly shorter commute for Bridgeport and Milford office service officers and their clients and should be explored.

Accessibility is not an issue for all OAA district offices. District 1 is co-located in the VA hospital in Newington enabling veterans to potentially have a medical appointment and see an OAA representative on the same day. In District 4, OAA is part of the Veterans Support Center through collaboration with the VA and the City of Bridgeport. The Center is a one-stop for veterans in need of a variety of services including services from the city’s veterans’ affairs department, a local food pantry, and readjustment counseling sessions. A shuttle bus runs from the center to the VA Hospital in West Haven twice a day. PRI staff believes the Bridgeport model should be replicated throughout the state and therefore recommends:

⁵⁹ PRI staff analysis of Veteran Satisfaction Survey results.

⁶⁰ In FFY 14 BVA conducted 54 percent of its hearings via video teleconferencing. Board of Veterans’ Appeals Annual Report, Fiscal Year 2014

18. OAA should explore the possibility of moving its district offices to improve client accessibility and convenience, with particular consideration given to co-location with other relevant services for veterans and their families.

As described next in Chapter V, joining with other service providers, such as the Department of Labor’s veteran employment specialists, would also serve to leverage limited staffing resources. Reduced isolation of OAA staff would be another potential positive result.

OAA had a mobile van to assist with community outreach until 2014, when numerous mechanical and cosmetic repairs could no longer be postponed. Refurbishing the van, seen in Figure IV-3, had been a recent priority of the department. Van upgrades were recently completed, and the van is anticipated to serve as a focal point for outreach events and enable up to two service officers to process claims wirelessly from laptop-equipped work stations, once the laptops arrive.

Figure IV-3: CT DVA Veteran Express



Source: PRI staff photo of Veteran Express mobile outreach van, taken November 5, 2015.

Accessibility need not be limited to physical considerations. With continual improvements in information technology and a growing population of younger veterans requesting their services, access can and should include web-based resources. The portion of the DVA website dedicated to the Office of Advocacy and Assistance is significantly outdated and confusing. This is in stark contrast, for example, to the website for the Department of Labor’s veteran employment unit, which offers online appointment requests by clients, eligibility screening, and internal tracking capabilities. PRI staff recommends:

19. The online presence and functionality of the Office of Advocacy and Assistance should be significantly improved. The Department of Veterans’ Affairs should undertake a review of the weaknesses of OAA’s current website, with particular attention to the validity of its information on veterans’ benefits. Ease of navigation

and offering capabilities not currently available online, such as eligibility screenings and appointment requests, should be considered.

Collaboration and Coordination

Committee staff was tasked with examining OAA's collaboration and coordination with the federal VA, state agencies, municipalities, and other veterans' service organizations that assist and advocate for veterans. The extent of OAA's collaboration and coordination with other stakeholders is relative, however, because without some level of each, assistance to veterans and their family members could be less than optimal. In addition to OAA's collaboration and coordination with external veterans' services providers, there is a need for both across OAA districts to ensure an effective and efficient service delivery system.

Federal Department of Veterans Affairs

The Office of Advocacy and Assistance maintains a district office at the VA hospital in Newington. The office is currently staffed with one VSO. The VSO is responsible for filing claims for the district office and interacting with the VA to provide liaison services between the VA and OAA's district offices. This mainly includes working with the VA's claims reviewers for claims submitted by OAA.

The veterans services officers for OAA's District 1 office was previously located at the Veterans' Home in Rocky Hill, with a supervisor located at the VA's Hartford Regional Benefit Office in Newington until 2007. In late 2010, OAA moved the remaining full-time VSO from the Rocky Hill location to the VA's Newington office. OAA's office space provided by the VA is rent- and utility-free, and the computer used by the VSO is also provided by the VA. Moving the VSO to the Newington site was intended to ensure coordination between the two agencies. Committee staff believes, at minimum, *the logistics of having a VSO on-site at the VA's Hartford Regional Benefit Office enhances overall coordination and collaboration between OAA and the VA.*

The on-site VSO is able to directly meet with VA benefits staff either formally or on an impromptu basis. This undoubtedly leads to quicker resolution of questions and problems for all OAA's veterans services officers. Without OAA's direct presence at the VA, such collaboration would be difficult. In addition, the VSO receives information via weekly emails from the VA about actions taken on veterans' claims for all of OAA's veterans services officers. The VA recognizes, in part, that its electronic claims processes are relatively new, so the weekly update was implemented to help alleviate any lags in communication from the VA involving veterans' benefits claims. OAA's Newington office distributes the information to the other VSOs, giving them quicker access to claims information they may not currently have and allowing them to check the VA's information against their own records to ensure both correspond. This process is intended to add a level of coordination between VA and OAA districts regarding claims management.

The VSO in Newington and the OAA manager – along with other veterans' services organizations – attend monthly meetings with the VA's director of veterans benefits at Hartford Regional Benefits Office. The meetings are designed to ensure regular interaction among the

stakeholders to help resolve any issues involving the benefits claims process. The meetings also allow the VA to provide updates on any relevant VA process changes or initiatives. The Newington VSO is also the OAA manager's primary designee when the manager cannot attend a meeting.

Although training sessions developed by the VA for OAA veterans services officers are said to be infrequent, some training occurs. One recent session was requested by the Newington VSO. The session, held at the VA's Newington site, involved an open meeting between VA claims managers and OAA veterans services officers to formally meet and discuss claims processing. The session also included VA-led training to VSOs on the Stakeholder Enterprise Portal (i.e., the VA's system allowing electronic access to veterans' benefits claims by all federally-accredited veterans' representatives).

Based on the initiatives highlighted above, and as a result of discussions with the Newington office VSO and the VA's Hartford Regional Benefits Office, committee staff finds *the level of coordination and collaboration between OAA and the VA's benefits office is adequate, and appropriate lines of communication exist to help resolve any issues between the two agencies that may arise.*

Veterans Services Organizations

Similar to OAA, several veterans services organizations have office space at the VA's Newington site. American Legion, Disabled American Veterans, Military Order of the Purple Heart, and Veterans of Foreign Wars, each has at least one veterans services officer on-site at the VA office.

Many veterans services organizations in Connecticut offer assistance to veterans through their own VA-accredited representatives (also known as VSOs). The services are provided at no cost to veterans, and include comparable services to OAA in helping veterans and family members with their federal benefits claims.

Committee staff interviewed VSOs from American Legion, Disabled American Veterans, and Veterans of Foreign Wars about their services. Each organization was asked about its working relationship with OAA. In addition, committee staff asked the same question of OAA. There was agreement among the organizations that their primary goal is to help veterans and their families. However, *while the organizations, including OAA, offer similar services, seem to have positive overall working relationships with each other, and make referrals across organizations at times, there did not seem to be much formal collaboration and/or coordination among them.*

State Agencies

Department of Labor. Committee staff met with the Department of Labor's Office for Veterans' Workforce Development (OVWD) to better understand the services it provides to veterans and its relationship with OAA. The OVWD operates six veterans employment centers

located in job centers throughout the state, each with veterans employment representatives.⁶¹ The representatives assist veterans with their employment and training needs, conduct workshops, and offer case management and counseling services. The OVWD offices also have disabled veterans outreach specialists who provide outreach to veterans in need of case management and counseling services.

Citing ways to improve the coordination and delivery of veterans' services, OVWD presented a draft report to the state labor commissioner in 2013.⁶² The report, made available to committee staff by OVWD, outlined a proposal to consolidate OAA's offices into OVWD's existing offices. The two entities would retain their respective roles and staffing, but cost savings could be realized through centralized office function. The report noted office realignment would offer veterans an integrated advocacy system, one-stop customer shopping, and an assimilated case management system similar to other states. The report further estimates the state could recoup a minimum of fifty to sixty million dollars annually through veteran enrollment in federal benefit programs, but did not include specific details as to how this would occur.

While nothing formal has been done with the report's recommendations, PRI staff believes consolidating OAA office locations with OVWD's existing offices may be an idea worth exploring, specifically in light of the state's current budget issues. This is not to suggest elimination of OAA's services, but whether cost savings to the state could be realized through a more efficient service delivery system with OVWD. As discussed in the previous chapter, one interesting service model is occurring with OAA's Bridgeport office. The office has integrated its services with those of multiple local and state agencies in one central location, offering easier access to veterans for a range of services beyond those provided by OAA. PRI committee staff recommends:

20. An interagency workgroup should be developed to examine the services provided to veterans by state agencies, their service delivery systems, and whether ways exist to consolidate office space and/or administrative functions for a better coordinated veterans' services structure. The workgroup should at least include representatives from the state veterans' affairs, labor, and social services departments. Any recommendations produced by the workgroup should be forwarded to the commissioners of each agency, the governor's office, and the legislature's veterans' affairs committee by December 31, 2016. The Department of Veterans' Affairs commissioner (or his designee) should lead the workgroup.

The purpose of recommending a workgroup is simply to examine whether coordination and/or consolidation of any services among key state agencies serving veterans would be beneficial to veterans and their family members, while possibly offering cost savings for the state. The recommendation is not intended to diminish the services provided by any agency. Instead, it is meant to create a state system to assist veterans and their families in the most efficient and effective way possible.

⁶¹ Offices are located in Bridgeport, Hamden, Hartford, New Britain, New London, and Waterbury.

⁶² DRAFT COPY: Report to: Commissioner Sharon Palmer, The Connecticut Department of Labor, April 29, 2013. *Proposal: Strengthening the delivery of Veteran Services*. Prepared by Terence Brennan, Director, The Connecticut Department of Labor, Office of Workforce Development.

Department of Social Services. PRI staff met with a DSS eligibility specialist who makes biweekly visits to the state Veterans' Home to determine residents' eligibility for DSS services (i.e., Medicaid). Other than those visits, the person has no other formal contact with OAA veterans services officers to coordinate services between the two agencies.

In addition, a 2009 Memorandum of Agreement between DVA and DSS called for greater collaboration between the two agencies.⁶³ Specifically, the agreement: 1) allowed DSS to send quarterly electronic reports to DVA containing lists of DSS clients deemed by DSS to either receive or be eligible for benefits from DSS and the VA; 2) specified DVA would further research eligibility, and apply for federal benefits for veterans and their family members when applicable; and 3) specified DVA must report back monthly to DSS on the status of the benefits. DVA receives information from DSS, although it may not always be quarterly. The information is reviewed by a part-time technical staff person⁶⁴ to determine, in part, if veterans or their family members already have a POA with the Office of Advocacy and Assistance. Veterans' information is then sent to the appropriate OAA district office for follow-up with the veteran or family member. Medicaid recipients are not required to switch to VA health care benefits, and a VSO's role is to advise clients of such benefits.

It is important for OAA to continually seek ways to maximize veterans' and their family members' benefits where possible. In addition to continuing to work with DSS, this includes ensuring compliance with the statutory requirement that agencies providing benefits to veterans must submit an annual report to DVA on the description of the benefits, their value, and the number of veteran recipients.⁶⁵ Committee staff believes the above recommendation to establish a working group to examine interagency coordination should help strengthen the overall working relationship across the appropriate agencies, including DSS.

Other. The Office of Advocacy and Assistance manager is a member of the following statewide committees: Governor's Council for Employing People with Disabilities; Operation Iraqi Freedom/Operation Enduring Freedom; and Community Veterans Engagement Board. Membership on those committees, in theory, should help with the coordination of veterans' services across various state agencies. The manager also participates on various DVA internal committees to help coordinate operations within the department.

Another example of increased collaboration on the part of DVA and OAA, is the new working relationship with the Connecticut Veterans Legal Center (CVLC). As noted earlier, the two have partnered to begin having CVLC provide training for OAA veterans services officers on various topics. The training will be VSO-centric; CVLC will first solicit information from each VSO regarding topics of most interest to the VSO. The legal center will integrate this

⁶³ *Commission on Enhancing Agency Outcomes: Proposal to Take Advantage of Federal Assistance to Veterans.* Handout, 11/20/10 CEAO Meeting. (The commission was created by P.A. 09-2 and P.A. 09-7 (Sept. Sp. Session) to identify functional overlaps and other redundancies among state agencies, with the goal of reducing state costs and enhancing the quality and accessibility of state services. The program review committee co-chairs were added as commission members by P.A. 09-7, and two PRI staff analysts were loaned as staff to the commission during the 2010 calendar year.). Also see March 1, 2011, DVA commissioner written testimony on HB 6480 to the Select Committee on Veterans' Affairs.

⁶⁴ From the Department of Administrative Services, Bureau of Enterprise Systems and Technology.

⁶⁵ C.G.S. Sec. 27-102p

information into training sessions for all VSOs. The training process is anticipated to begin this December.

Municipalities

Since 2013, state law requires municipalities that have not established their own local veterans' advisory committee or otherwise provide funding for a local veterans' service officer, to formally designate a city or town employee to serve as a veterans' service contact person in the municipality.⁶⁶ The contact person is required to carry out specific duties, including coordinating veterans' services at the local level.

The Office of Advocacy and Assistance is required by law to conduct an annual training course for any municipal employee designated a veterans' service contact person.⁶⁷ Municipal veterans' contacts, however, are not required by law to complete the OAA training course.⁶⁸

Following an initial training session at the state Veterans' Home, OAA has provided training throughout the state, when requested by one or more municipalities, to fulfill OAA's statutory training requirement. The sessions outline OAA's organization and responsibilities, and provide information about state veterans benefits and the duties of municipal veterans' contacts. OAA provided committee staff its list of 127 municipal employees who have attended the trainings. The number of names, however, does not equate to the number of municipalities, since more than one person from the same town may have been trained and show up on the list. Committee staff calculated representatives from 117 different towns – or 69 percent of all towns in Connecticut – have received OAA's training.

What is not clear, however, is the total number of municipalities required to have a municipal veterans services contact person. Moreover, municipal veterans' service contacts may change for various reasons. Since towns are not formally required to notify OAA as to how they comply with the statute or who their municipal veterans service representatives are, OAA has no way of knowing how towns fulfill the statutory requirement. The office also has no way of ensuring the information on its contact list is current, short of reaching out to each person on the list.

When the state law requiring municipalities to designate a veterans' service contact person was implemented in 2013, the Department of Veterans' Affairs commissioner at that time sent a letter to all city and town officials notifying them of their responsibility to designate a local veterans' service contact person, and informing them that training would be provided by the department. Since then, no similar correspondence has been sent.

Under the current structure, OAA cannot fully know the extent to which towns are complying with the statutory requirement for when they must designate a municipal contact person for veterans' services; nor are towns notified by DVA on a recurring basis of this requirement to account for possible changes in municipal personnel. PRI staff recommends:

⁶⁶ C.G.S. Sec. 27-135

⁶⁷ C.G.S. Sec. 27-102l

⁶⁸ C.G.S. Sec. 27-135

- 21. The Department of Veterans' Affairs should annually notify each municipality of its responsibility to designate a municipal employee as the town's veterans' service contact person (in accordance with state law). The notification should require municipalities to submit the name and email address of their contact representatives to the Office of Advocacy and Assistance on a timely basis upon receipt of the DVA's correspondence.**

- 22. Municipal veterans' service contract persons should be required to complete the formal training provided by OAA. The training should be completed one time only, but within three months of becoming the designated municipal veterans services contact person. Any current municipal contact person who has not received the OAA training should do so by April 1, 2016. OAA should offer its training quarterly, which should include a summary of state and federal veterans' benefits, the role of municipal veterans' service contacts, and how OAA can to help the municipal contacts questions arise. OAA should periodically collect feedback from participants as to their overall satisfaction with the training.**

Municipal survey. PRI staff distributed an electronic survey to individuals listed on the OAA municipal veterans service contact list with the intent of learning about the experiences and opinions of municipal veterans services contacts with and about OAA. Due to the relatively low response rate to questions, committee staff determined no meaningful analysis could be done of the survey results.

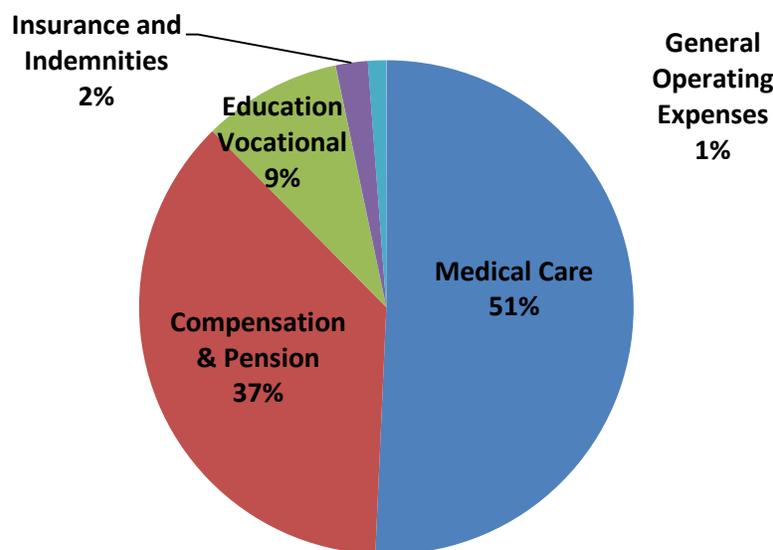
How Well is Connecticut Assisting Veterans?

This chapter provides an analysis of outcomes attributable to the statewide veterans' service system, which includes OAA. PRI staff determined *Connecticut compares poorly to other states in securing the maximum federal benefits for its veterans. In a variety of metrics, Connecticut ranks well below the national average and often ranks low or lowest when compared to surrounding states* (New England, New York, and New Jersey). OAA, as the state's veteran service organization, is at least partially accountable for this poor performance and, with the largest number of service officers of all the state's service organizations, must be integral in its improvement.

Total VA Spending

For FFY 14, the VA expended \$1.17 billion in benefits for Connecticut veterans, with the majority spent in three categories (see Figure VI-1 below): medical care (51 percent); disability compensation and pension (37 percent); and education and vocational rehabilitation/employment (9 percent).⁶⁹

Figure VI-1: FFY 14 VA Expenditures for Connecticut



Source: National Center for Veteran Analysis and Statistics, "FY14 Summary of Expenditures by State." Accessed September 14, 2015 at <http://www.va.gov/vetdata/Expenditures.asp>

⁶⁹National Center for Veteran Analysis and Statistics, "FY14 Summary of Expenditures by State." Accessed September 14, 2015, at <http://www.va.gov/vetdata/Expenditures.asp>

When analyzed in terms of 2014 *per capita total spending* on veterans by state, as shown in Table VI-1, Connecticut ranks third lowest in the nation - \$5,490 per veteran compared to a national average of \$7,360 per veteran. Only Delaware and New Jersey rank lower. New Hampshire, Vermont, Massachusetts, and New York rank higher, however, but still below the national average. Of the surrounding states only Rhode Island and Maine meet or exceed the national average in per capita total spending by the VA. PRI staff completed this analysis for FFYs 10 –13 as well with similar results – Connecticut consistently ranked as one of the lowest states in the country in per capita total VA spending.

Table VI-1: Per Capita Total VA Spending: Surrounding States vs. National Average (2014)

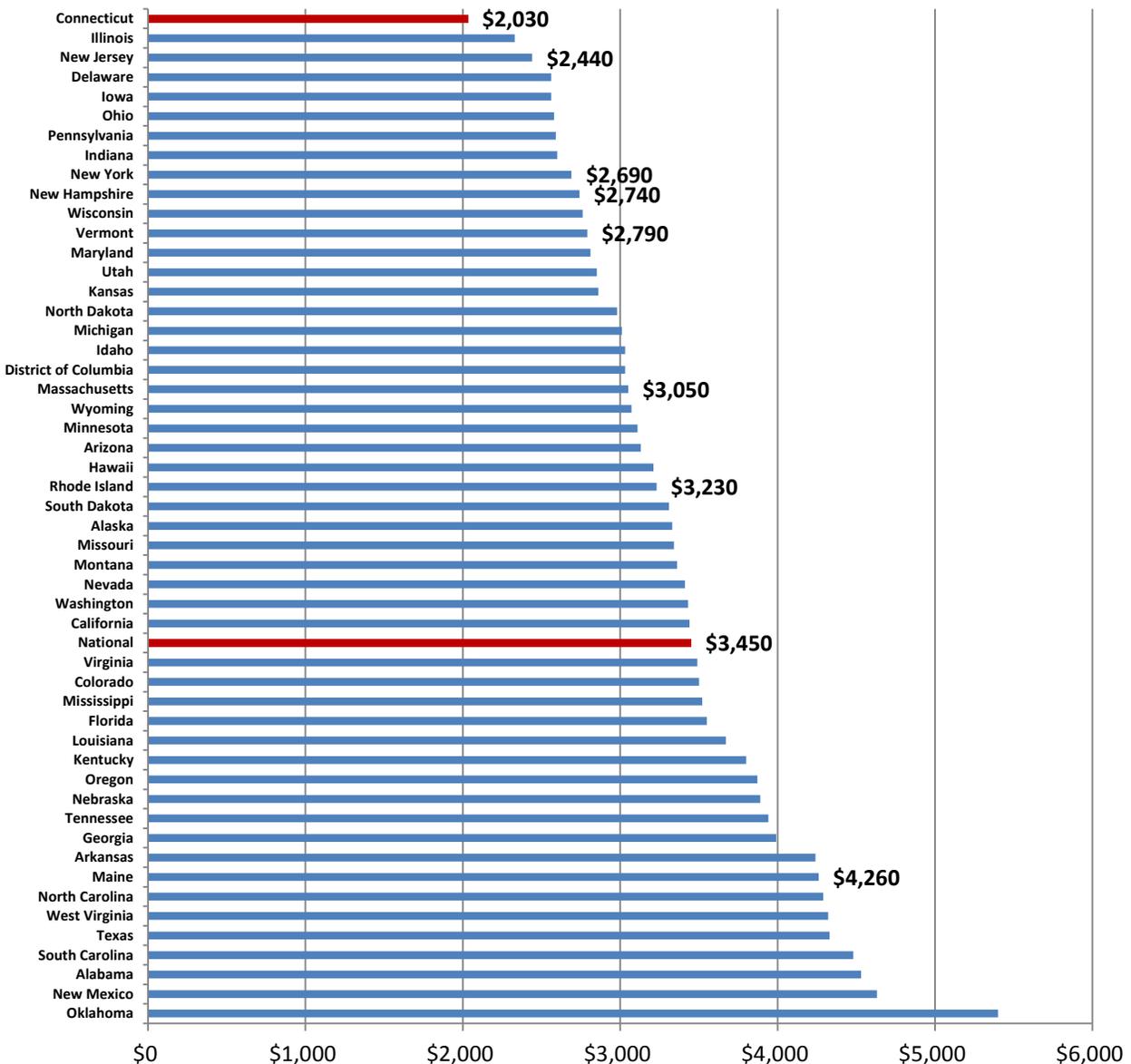
New Jersey	\$4,940
Connecticut	\$5,490
New Hampshire	\$5,930
Vermont	\$6,080
Massachusetts	\$6,830
New York	\$6,860
National	\$7,360
Rhode Island	\$7,360
Maine	\$7,540

Source: PRI staff analysis of NCVAS data, "FY14 Summary of Expenditures by State."

Compensation and Pension

In FFY 14, Connecticut veterans received the least amount of *per capita VA compensation and pension spending* in the nation – approximately \$2,030 per Connecticut veteran – more than forty percent below the national average of \$3,450 per veteran (see Figure VI-2). In comparison, surrounding states ranked as follows: Maine; Rhode Island; Massachusetts; Vermont; New Hampshire; New York; and New Jersey.

Figure VI-2: Per Capita VA Compensation & Pension Spending by State FFY 14



Notes: Compensation and pension expenditures include dollars for the following programs: veterans' compensation for service-connected disabilities; dependency and indemnity compensation for service-connected deaths; veterans' pension for nonservice-connected disabilities; and burial and other benefits to veterans and their survivors.

Sources: Veteran population estimates, as of September 30, 2014, are produced by the VA Office of the Actuary (VetPop 2014); USASpending.gov for Compensation & Pension expenditures.

Nationwide, 17.5 percent of veterans receive disability compensation or pension benefits compared to 12.4 percent of Connecticut veterans. This is the lowest percentage rate in the country. In contrast, 29.4 percent of Nebraska's veterans receive disability compensation or pensions, the highest rate of any state. New Jersey (13.2 percent), New York (14.8 percent), Vermont (15.7 percent), New Hampshire (16.5 percent), and Massachusetts (16.6 percent) have

higher rates of utilization than Connecticut, but still fall below the national average. Rhode Island (17.5 percent) meets, and Maine (21.7 percent) exceeds, the national average.

Breaking out disability compensation and pensions to analyze separately, as shown in Table VI-2 above, does not improve the picture for the state. *Nationwide, 18 percent of veterans receive disability compensation compared to 11.5 percent of Connecticut veterans. This is the lowest percentage of veterans receiving disability compensation among all New England states as well as New York and New Jersey.* Could this low receipt of disability compensation be a result of more Connecticut veterans receiving military retirement pay through the Department of Defense since the two benefits typically cannot be received concurrently?⁷⁰ This is unlikely, as disability compensation generally pays a higher benefit and is tax-free whereas military retirement pay is taxed.⁷¹

Table VI-2: Veteran Receipt of VA Compensation & Pension - National vs. Selected States Population (2014)

	Total Veteran Population	# Receiving Disability Compensation	% Receiving Disability Compensation	# Receiving Pension	% Receiving Pension
National	22,000,000	3,949,066	18.0%	304,556	1.4%
Connecticut	213,000	24,496	11.5%	1,986	0.9%
Maine	127,000	25,740	20.3%	1,863	1.5%
Massachusetts	380,000	58,942	15.5%	3,914	1.0%
New Hampshire	114,000	17,875	15.7%	922	0.8%
New Jersey	428,000	53,441	12.5%	3,168	0.7%
New York	892,000	119,386	13.4%	12,481	1.4%
Rhode Island	72,000	11,653	16.2%	973	1.4%
Vermont	49,000	7,242	14.8%	393	0.8%

Note: VA estimate as of 9/30/2014

Source: PRI staff analysis of VA National Center for Veterans Analysis and Statistics State Summary Fact Pages data.

*Connecticut ranked only slightly better in terms of veterans receiving pensions, a tax-free monetary benefit payable to low-income wartime veterans – again, not to be confused with military retirement pay.*⁷² As Table VI-2 shows, 1.4 percent of veterans nationwide receive pension benefits. New York, Rhode Island, and Maine meet or exceed this national average. Less than 1 percent (0.9 percent) of Connecticut veterans receive pension benefits – just below Massachusetts (1.0 percent) and above New Hampshire (0.8 percent), New Jersey (0.7 percent) and, Vermont (0.8 percent).

⁷⁰ Under Title 38 of the United States Code, Sections 5304 and 5305, service-connected disabled veterans cannot receive both disability compensation from the VA and medical retirement pay from the Department of Defense. Policy changes in 2004 allow certain DOD retirees to collect benefits from both programs simultaneously.

⁷¹ Military retirement pay, designed to compensate a service member for their career being ended early, is calculated based on the DOD's disability rating and years of service. Disability compensation, designed to compensate for the loss of civilian earnings after service and to pay for functional loss resulting from the disability, is determined by the VA's disability rating and number of dependents. Source: <http://www.nolo.com/legal-encyclopedia/choosing-between-dod-retirement-benefits-va-disability-compensation.html> accessed December 5, 2015.

⁷² A veteran's VA pension is calculated to be an amount equal to the difference between his or her countable family income and the annual pension limit set by Congress. Source: <http://www.benefits.va.gov/PENSION/pencalc.asp> accessed November 20, 2015.

Although benefits for veterans' eligible family members exist, the VA publishes few statistics about this group. Nationwide the VA reported 382,245 Dependency Indemnity Compensation (DIC) beneficiaries and 211,716 death pension beneficiaries in FFY 14 (see Table VI-3).⁷³ For the same time period, Connecticut DIC beneficiaries numbered 2,043 and death pension beneficiaries numbered 1,698. Without further data, such as the total population of eligible beneficiaries, it is difficult to determine how Connecticut is doing in these benefit categories.

Table VI-3: Beneficiary Receipt of VA Compensation – National vs. Selected States (2014)

	# DIC Beneficiaries	# Survivors Pension Beneficiaries
National	382,245	211,716
Connecticut	2,043	1,698
Maine	2,388	718
Massachusetts	5,907	2,788
New Hampshire	1,553	542
New Jersey	5,854	2,870
New York	11,737	10,827
Rhode Island	1,177	747
Vermont	694	199

Note: As of 9/30/2014

Source: VA National Center for Veterans Analysis and Statistics State Summary Fact Pages

Medical Care. As shown in Table VI-4, *Connecticut ranks 42nd of the 50 states in the percentage of veterans enrolled in the VA healthcare system (37.1 percent of Connecticut veterans).* In comparison to surrounding states, only New Jersey (34.2 percent) and Massachusetts (36.2 percent) have lower enrollment than Connecticut. New Hampshire (38.8 percent) and Rhode Island (40.2 percent) have higher enrollment rates but are still below the national average of 41.6 percent. Vermont (43.6 percent), Maine (45 percent) and New York (45.8 percent) exceed the national enrollment rate. South Dakota has the highest enrollment rate of 55.9 percent.

⁷³ Dependency and Indemnity Compensation (DIC) is a tax free monetary benefit generally payable to a surviving spouse, child, or dependent parent of service members who died while on active duty, active duty for training, or inactive duty training or survivors of veterans who died from their service-connected disabilities. DIC for parents is an income based benefit. The Survivors Pension benefit, also known as a death pension, is a tax-free monetary benefit payable to a low-income, un-remarried surviving spouse and/or unmarried children of a deceased veteran with wartime service.

Table VI-4: Veteran Utilization of VA Health Care – National vs. Selected States (2014)

	Total Veteran Population	# Enrollees in VA Health Care	% Enrolled in VA Health Care	# Unique Patients Treated	% Unique Patients Treated
National	22,000,000	9,106,480	41.4%	5,869,487	26.7%
Connecticut	213,000	78,942	37.1%	51,070	24.0%
Maine	127,000	57,294	45.1%	39,859	31.4%
Massachusetts	380,000	137,592	36.2%	83,919	22.1%
New Hampshire	114,000	44,120	38.7%	28,962	25.4%
New Jersey	428,000	146,348	34.2%	77,114	18.0%
New York	892,000	408,856	45.8%	230,155	25.8%
Rhode Island	72,000	28,918	40.2%	19,951	27.7%
Vermont	49,000	21,182	43.2%	14,918	30.4%

Notes: As of 9/30/2014

Source: VA National Center for Veterans Analysis and Statistics State Summary Fact Pages

Once Connecticut veterans are enrolled within the VA health care system, most appear to be utilizing it - just under two-thirds utilized medical services last year. For FFY 14, the VA reported 51,073 unique patients utilized the VA healthcare system out of Connecticut’s 78,942 enrollees, or a utilization rate of 65 percent of enrolled veterans – just above the national average of 64 percent as well as the utilization rates for New Jersey (53 percent), New York (56 percent), and Massachusetts (61 percent). Utilization rates for New Hampshire, Rhode Island, Maine, and Vermont exceeded the national average. Of the more than 51,000 veterans utilizing VA medical services in FFY 14, the average per-patient cost for Connecticut was \$11,620 – eighth highest in the country.⁷⁴

Educational and Vocational. Connecticut and nearby New Jersey meet the national per capita average of \$500 per veteran in terms of VA spending on education, vocational rehabilitation, and employment. This is better than Vermont (\$420) and Maine (\$360). New Hampshire (\$510), Massachusetts (\$550), Rhode Island (\$560), and New York (\$610) all exceed the national average.⁷⁵

Comparing Connecticut Veterans

PRI staff believes it is important for context to show how Connecticut’s veteran population compares with that in other New England states as well as nationally based on several characteristics. It is also relevant to compare veterans’ characteristics across Connecticut’s congressional districts, since each district is home to an OAA satellite office staffed by at least one veterans services officer. Such comparisons help provide another level of analysis and

⁷⁴ Source: PRI staff analysis of VA National Center for Veterans Analysis and Statistics - FY14 Summary of Expenditures by State data.

⁷⁵ Ibid.

perspective to OAA’s role in terms of the veterans (i.e., clients) the office is responsible for serving.

New England and U.S. Table VI-5 provides an overview of certain demographic and other information comparing Connecticut with the five other New England states and nationally.

Table VI-5: Comparison of Veteran Information: Connecticut, New England, and U.S. (2014)

	Connecticut	New England*	U.S.
Total population	3,596,677	11,084,045	318,857,056
Total veterans population	213,420	741,234	21,999,108
Percent veterans of total population	5.9	6.7	6.9
Age			
<35	16,591	56,004	2,101,117
35-54	48,229	177,657	5,873,655
55-74	92,182	323,951	9,397,531
>74	56,418	183,622	4,626,805
Disability Ratings			
0-20%	9,714	637,834	1,289,049
30-40%	4,815	369,862	761,108
50-60%	3,638	297,581	605,053
70-100%	7,211	649,281	1,269,485
Gender			
Male	196,875	353,621	19,760,386
Female	16,545	26,151	2,001,382

* Maine, Massachusetts, New Hampshire, Rhode Island, Vermont
 Sources: PRI staff analysis of National Center of Veteran Analysis and Statistics data; U.S. Census Bureau (My Congressional District, 2014).

Specifically, for 2014, the table shows:

- As a percent of total population, Connecticut had 14% fewer veterans than the national average, and 12% fewer than the average for each of the other five New England states;
- Similar to New England states and nationally, veterans in the 55-74 age group accounted for the highest percentage of veterans in Connecticut, generally around 43% of all veterans;
- Connecticut had a lower percentage of veterans ages 35-54 than the other New England states or nationally – 22.6% (CT), 24% (NE), 26.7% (U.S.). On the other hand, the state had a greater percentage of veterans over age 74 – 26.4% (CT), 24.8% (NE), and 21% (U.S.);
- Connecticut had a higher percentage of veterans with combined disability ratings of 0-20 percent – 38.3% (CT), 32.6% (NE), 32.8% (U.S.), while the state had a lower percentage of veterans with disability ratings of 70-100% – 28.4% (CT), 33.2% (NE), 32.3% (U.S.); and

- The percentage of veterans by gender in Connecticut generally mirrored the other New England states, with roughly nine out of every ten veterans being male, but was somewhat higher than the national average. Connecticut’s female veterans totaled just under eight percent of all veterans, which was higher than the 3.5 percent for other New England states, and lower than the nine percent national rate.

Benefits Across OAA Districts

The population of Connecticut veterans and VA spending on their benefits is not necessarily consistent across Connecticut’s congressional districts. Table VI-6 shows the percentage of Connecticut’s veterans residing in each of its five congressional districts, followed by each district’s share of total VA expenditures in FFY 14. The three main categories of VA expenditures: 1) medical care; 2) compensation and pension; and 3) educational and vocational rehabilitation/employment; and their associated distribution across each district are also provided. Districts with shares of total or categorical spending below their proportional population’s share are shaded in light blue. As such, Districts 4 and 5, with 13.5 percent and 19.7 percent of Connecticut’s veterans respectively, received less than their proportional share of VA funding across all categories. In contrast, District 3 received more than its proportional share across all categories. Districts 1 and 2 had mixed results, with funding both higher than and lower than their proportional shares.

Table VI-6: Share of VA Expenditures by District (2014)

Congressional District	% CT Veteran Population	% Total VA Expenditure	% Medical Care	% Compensation & Pension	% Educational & Vocational Rehabilitation/ Employment
District 1 (Newington)	20.2%	20.5%	18.0%	22.2%	19.4%
District 2 (Norwich)	27.7%	21.8%	16.4%	27.7%	30.0%
District 3 (Milford)	18.9%	31.5%	39.2%	24.0%	25.5%
District 4 (Bridgeport)	13.5%	10.9%	10.7%	10.7%	11.1%
District 5 (Waterbury)	19.7%	15.3%	15.7%	15.5%	14.0%

Sources: Data provided by the Allocation Resource Center (ARC). Veteran population estimates, as of September 30, 2014, are produced by the VA Office of the Actuary (VetPop 2014). USASpending.gov for Compensation & Pension expenditures.

Veteran population by district. PRI staff examined several characteristics pertaining to veterans across Connecticut’s five congressional districts, based on available VA information. As noted above, OAA has a regional office in each of the state’s congressional districts to serve veterans and their family members. The purpose of this analysis is to better understand the similarities and/or differences that exist in the veterans OAA is responsible for serving within each district.

While some veterans' characteristics data is available by congressional district (i.e., OAA district office),⁷⁶ the federal data for disability ratings in Connecticut is county based. As such, analysis of disability ratings across OAA district offices was not possible for this report. In addition, the VA data by congressional district only provides age of veterans for those either under 65 or 65 and older.

Table VI-7 shows for 2014, OAA's second district office (i.e., Norwich) had the highest number of veterans and a greater percentage of veterans of total population than the other four districts. The veteran population in the Norwich district was just over 59,200, which was double that of Bridgeport's total veteran population of 28,795, the fewest number of veterans of the five districts. Similarly, the Norwich district had the highest proportion of veterans to total population of the OAA districts – 8.3 percent, followed by the Newington district at 6 percent. Bridgeport had the lowest percentage, at 3.4.

Table VI-7: Comparison of Veteran Information Across OAA Districts (2014)

	District 1 (Newington)	District 2 (Norwich)	District 3 (Milford)	District 4 (Bridgeport)	District 5 (Waterbury)
Total population	711,205	710,798	720,986	740,215	713,473
Total veterans population	43,106	59,202	40,292	28,795	42,021
Percent veterans of total population	6.0	8.3	5.6	3.4	5.6
Age					
Under 65	19,707	31,829	18,225	10,686	19,140
65 and over	23,399	27,378	22,067	18,109	22,881
Gender					
Male	39,347	54,368	37,243	27,156	38,761
Female	3,758	4,839	3,049	1,639	3,259

Source: PRI staff analysis of National Center for Veterans Analysis and Statistics data.

In terms of age, the highest percentage of veterans under age 65 lived in the Waterbury OAA district (54 percent), while the highest concentration of veterans ages 65 and over was in OAA's Bridgeport district (63 percent). The highest concentration of male veterans was in Bridgeport (94 percent), and in Newington for female veterans (9 percent).

Veterans Awareness of Benefits

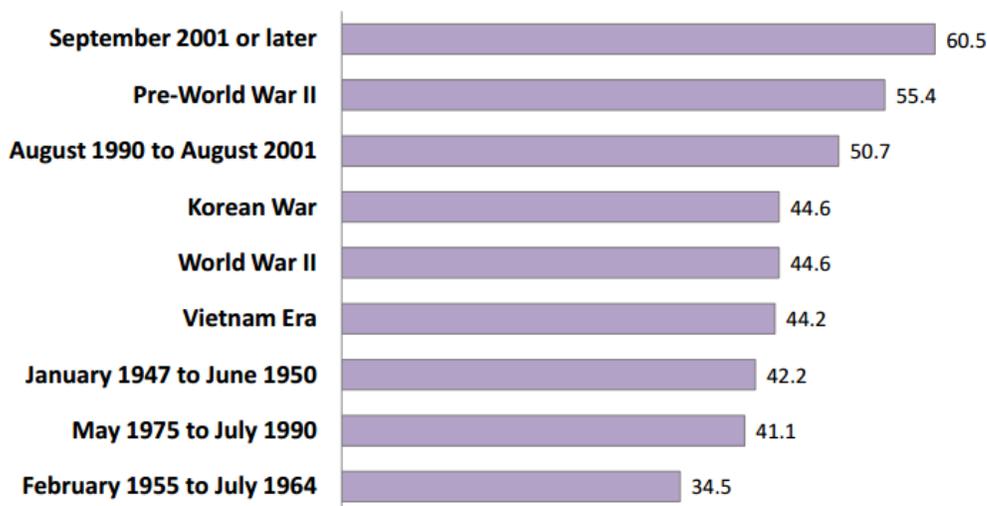
Increasing awareness of Connecticut veterans' eligibility for benefits and services should help to improve utilization within districts as well as statewide. The most recent National Survey of Veterans (NSV)⁷⁷ found that veterans' understanding of available VA benefits and services decreases as separation from military service increases (see Figure VI-3 below).

⁷⁶ Committee staff sought information from the VA on claimants' education level, employment status, and income level, as these factors would affect services needed, but the information is not being tracked.

⁷⁷ The National Survey of Veterans was designed by the U.S. Department of Veterans Affairs to help plan and allocate for veterans' programs and services, compare characteristics of veterans using benefits and services with those who do not, and assess the awareness of benefits and services available to veterans and other stakeholders.

2010 National Survey of Veterans: Key Findings

Percent Understanding Available VA Benefits and Services
Ranked by Period of Military Service



Source: Department of Veterans Affairs, National Survey of Veterans, Final Report, 2010.

Prepared August 15, 2011

Furthermore, as Figure VI-4 demonstrates, the main reason cited by survey respondents for not applying or using VA benefits and services was a lack of awareness of the benefit and how to apply for it.

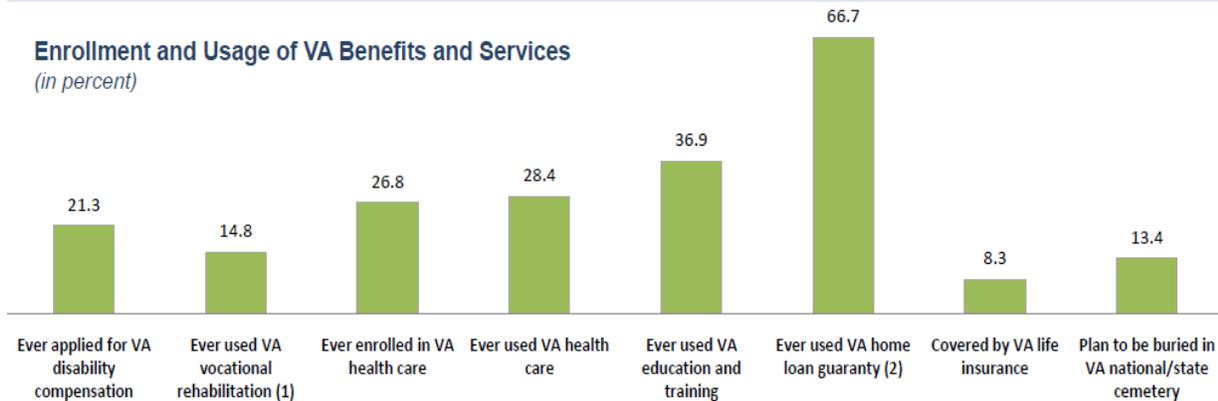
Accredited Representatives

The VA recommends veterans appoint an accredited veterans service officer to help initiate, gather required records and evidence, and submit claims for compensation and pension benefits. To aid veterans in identifying professionals qualified to assist with their claim the VA maintains a searchable database of all VA-accredited attorneys, claims agents, and veteran service organization representatives on its website. According to this database, Connecticut currently has 367 professionals able to assist veterans in submitting a claim for veterans' benefits.

2010 National Survey of Veterans: Key Findings

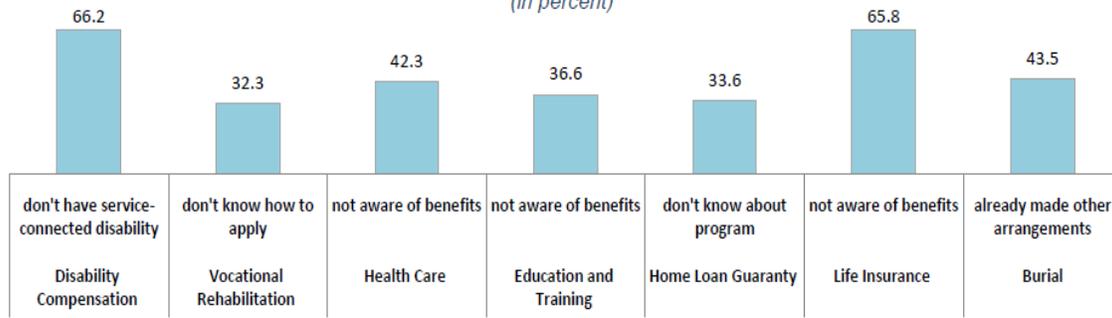
Enrollment and Usage of VA Benefits and Services

(in percent)



Main Reason for Not Applying or Using VA Benefits and Services

(in percent)



Notes: (1) Of those applying for disability compensation; (2) Of those ever having home loan.

Source: Department of Veterans Affairs, National Survey of Veterans, Final Report, 2010.

Prepared August 15, 2011

Are 367 accredited professionals sufficient to meet the needs of Connecticut veterans filing claims for benefits? While it is difficult to determine system capacity, it is possible to compare the size of Connecticut's system to that of other states. In terms of Connecticut's veteran population, this total number of VA-accredited professionals initially appears relatively high – of surrounding states, only New York has a higher per capita ratio of accredited professionals to veterans. In fact, recent budget proposals have recommended reducing OAA staff, citing the high total number of accredited representatives in the state. However, attorneys and claims agents are permitted to charge a fee for their services whereas veteran service organization representatives do not.⁷⁸ The ratios for veteran service organization representatives offering free services to attorneys or claims agents offering services for a fee are listed below for Connecticut and the surrounding states.

⁷⁸ VA-approved fees may be charged by accredited attorneys and claims agents only after an initial claim has been decided upon by the VA and is appealed by the client.

Ratio of Veteran Service Representatives to Accredited Attorneys & Claims Agents

- | | |
|-------------------------|------------------------|
| 1. Vermont (1:2) | 5. New Jersey (1:4) |
| 2. Maine (1:2.5) | 6. New York (1:5) |
| 3. New Hampshire (1:3) | 7. Massachusetts (1:7) |
| 4. Rhode Island (1:3.5) | 8. Connecticut (1:8) |

In addition, when accounting only for the availability of free services, Connecticut's per capita ratio of accredited representatives to veterans drops to third lowest of the surrounding states – just above Massachusetts and New Hampshire (see Table VI-8 below). The low distribution of veteran service representatives offering free services to Connecticut veterans, coupled with the overall low rankings in terms of their receipt of VA benefits seems to support maintaining the eight state-funded service officers in OAA.

Table VI-8: Accredited Attorneys, Claims Agents, & Veterans Service Organization Representatives by Surrounding States (2014)

State	Veteran Population	Attorneys	Claims Agents	Veteran Services Reps	Total Accredited	Per Capita Accredited	Per Capita Reps Only
Connecticut	213,420	302	18	47*	367	0.17%	0.022%
Massachusetts	379,772	425	9	77	511	0.13%	0.020%
Maine	127,234	72	1	47	120	0.09%	0.037%
New Hampshire	113,660	36	3	19	58	0.05%	0.017%
New Jersey	428,396	381	6	137	524	0.12%	0.032%
New York	892,221	1,568	4	394	1,966	0.22%	0.044%
Rhode Island	71,966	67	2	27	96	0.13%	0.038%
Vermont	48,602	20	0	21	41	0.08%	0.043%

*Notes: Adjusted from 52 due to 2 OAA retirements, 1 separation, 1 double count, and OAA Manager, who is a VSO, but does not handle claims; Alpha Disability, a veterans advocacy group located in Shelton, employs the majority of claims agents in Connecticut.

Source: PRI staff analysis of U.S. Department of Veterans Affairs Accreditation Search data: (<http://www.va.gov/ogc/apps/accreditation/index.asp>) Accessed on November 24, 2015.

APPENDICES

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Legislative Program Review and Investigations Committee

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STUDY SCOPE

Department of Veterans' Affairs: Office of Advocacy and Assistance

Focus

This study will examine how well the Department of Veterans' Affairs Office of Advocacy and Assistance (OAA) provides "aid and benefit" to veterans, their spouses, and eligible dependents and family members, as required by state statute.

Background

The Office of Advocacy and Assistance assists veterans and their eligible family members in obtaining government veteran benefits. Federal law requires anyone – including those employed at OAA – helping veterans get federal benefits to be a Veterans' Service Officer (VSO) accredited by the federal Department of Veterans Affairs (VA). Veterans' Service Officers within OAA are responsible for informing veterans and family members about the benefits and services for which they may be eligible, and conducting the following activities:

- assisting in the establishment, preparation and presentation of claims pursuant to rights, benefits or privileges accruing to veterans;
- collecting and preparing data relating to benefits and services for veterans, their spouses, and eligible dependents;
- canvassing nursing homes to determine if veterans and/or spouses are due benefits;
- cooperating with service organizations in disseminating information;
- counseling veterans concerning educational training, health, medical, rehabilitation, housing facilities and services, and employment services; and
- representing veterans before the federal VA concerning claims and benefits.¹

In addition to its assistance and advocacy responsibilities, OAA is required to annually train veterans' service contact persons at the municipal level.² The office also: 1) handles the administrative functions for burial in the state's veterans' cemeteries; 2) maintains the State Veterans' Registry (an electronic database of military discharges); 3) manages the Connecticut

¹ Connecticut Department of Veterans' Affairs, <http://www.ct.gov/ctva/cwp/view.asp?a=2014&q=290856&ctvaNav> (accessed April 7, 2015).

² Any municipality that does not have its own local veterans' advisory committee separate from one or more other municipalities, and does not otherwise provide funding for a veterans' services officer, must designate a city or town employee to serve as a veterans' service contact person.

Wartime Medal and Registry program; and 4) ensures veterans' eligibility under the state's Veteran Flag Identifier program used for driver's licenses.

State law requires the Office of Advocacy and Assistance to have a staff of not less than eight, including six VSOs. All VSOs must be veterans, with at least one who is a woman responsible for addressing the concerns of women veterans, and at least two who are proficient in English and Spanish. A central OAA office is located on the Veterans' Home campus in Rocky Hill, with regional offices located in each of the state's five congressional districts. In FY 14, OAA had 15 staff and an operating budget of \$936,000.

Areas of Analysis

1. Describe the Office of Advocacy and Assistance, including its purpose, organization, functions, responsibilities, and processes to help veterans.
2. Catalogue OAA activities, including the: number of assistance applications received; type of assistance sought, by whom, and for whom; number of applications accepted and denied, and the reasons for denials; number and type of advocacy efforts; and other responsibilities completed by the office.
3. Evaluate OAA's outcomes in assisting accepted applicants, advocating for veterans and their family members, and performing other activities required of the office.
4. Examine whether OAA (and/or the department) evaluates its performance, what measures are used, and if the measures are adequate.
5. Assess OAA's staff workload, resources, and qualifications.
6. Determine whether OAA has a proper outreach plan to inform veterans of available benefits and services, and identify veterans in need of assistance.
7. Gauge veterans' overall satisfaction with services received from OAA.
8. Examine OAA's collaboration and coordination with the federal VA, state agencies, municipalities, and other veterans' service organizations to assist and advocate for veterans.
9. Identify the level and type of input and guidance OAA receives from the state veterans' affairs department's Board of Trustees.

Areas Not Under Review

This study will not re-examine any areas included in the program review committee's 2014 study of the Connecticut State Veterans' Home.

<p style="text-align: center;">PRI Staff Contact</p> <p style="text-align: center;">Jennifer Proto: jennifer.proto@cga.ct.gov Brian Beisel: brian.beisel@cga.ct.gov</p>
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Office of Advocacy & Assistance Data Request

In order to analyze workloads, we are requesting data be broken out by district office and by veteran service officer for offices with more than one VSO.

We are also looking for information on the activities of the Cemetery Services unit and the Rocky Hill headquarters. We understand most VSO activities are not applicable to these two locations, however some activities are. Please just use "NA" for any activity that does not apply.

We have made a data request to the VA's Hartford Regional Benefit Office as well and so are interested in OAA internal data – we do not want you to request any additional information from the VA in order to respond.

For comparability, please provide annual data by state fiscal year (July 1st to June 30th) for FY 11 – FY 15.

We are interested in demographics of the veterans and eligible family members OAA has served. Please provide information from the most recent year's claimants - not statewide veteran population information.

If no data is available please indicate as such within the data field.

OFFICE ACTIVITIES	
1	# annual office visits by type
1a	Annual # of scheduled appointments held
1b	Annual # of walk-ins taken
2	Annual # of reviews of benefit eligibility status
2a	In office
2b	At nursing home
2c	At assisted living facility
2d	At other outreach location
2e	At private home
3	# of Power of Attorney (POAs) executed annually
4	# of Intent to File submitted annually
5	# total claims filed annually (disability #24 + pension #35)
6	# of claims annually submitted electronically (eBenefits)

7	# of claims annually filed by mail (paper application)
8	Annual # nursing home visits
9	Annual # assisted living facility visits
10	Annual # private home visits
11	Annual # outreach events
11a	Veteran fairs
11b	Yellow Ribbon Programs
11c	Employment Seminars
11d	Senior citizen fairs
11e	Other (please specify)
12	Annual # phone calls received
13	Annual # referrals received by source
13a	Municipal veteran rep
13b	CT Dept of Labor
13c	CT Dept of Social Services
13d	Non-profit
13e	Other (please specify)
14	Annual # referrals made by type
14a	Education & Training
14b	Vocational Rehabilitation & Employment
14c	Housing
14d	Social Services
14e	Other (please specify)
15	# complaints received annually by type
	<i>Please list</i>
16	Avg # days to resolve complaints
17	Outcomes of complaints by type
	<i>Please list</i>
18	# of annual external staff trainings attended
19	# of annual internal staff trainings attended
20	# of municipal veteran contacts trained annually (since Oct 2013)
21	Burials conducted in state cemeteries annually
22	# CT Wartime Service Medal awarded annually
23	Veteran Flag Identifier issued annually on CT Drivers' Licenses
	DISABILITY CLAIM INFORMATION
24	# disability claims filed annually by classification
24a	Original disability claim
24b	New disability claim
24c	Reopened disability claim

24d	Claim for increased disability
24e	Secondary disability claim
25	# of Fully Developed Claims (FDC) for disability submitted annually
26	# of traditional unsupported disability claims submitted annually
27	Average # disabilities per claim
28	Avg # of days to complete disability claim (initial contact to OAA submission)
29	# disability claims filed annually by priority group*: <i>* as defined by federal VA. If not prioritized by OAA please indicate.</i>
29a	Homeless veterans
29b	Terminally ill
29c	Former POWs
29d	Medal of Honor recipients
29e	Extreme financial hardship
30	Total \$ awards granted annually by compensation type:
30a	Disability Compensation
30b	Dependency and Indemnity Compensation (DIC)
30c	Special Monthly Compensation (incl. Aid & Attendance)
30d	Claims Based on Special Circumstances
31	Average monthly award granted by compensation type:
31a	Disability Compensation
31b	Dependency and Indemnity Compensation (DIC)
31c	Special Monthly Compensation (incl. Aid & Attendance)
31d	Claims Based on Special Circumstances
32	# disability claims denied by VA annually
33	# of disability claims appealed annually by method
33a	# 646/Brief submitted
33b	Pre-certification review
33c	Ratings Board appearances
33d	BVA Informal Hearing
33e	Other (please specify)
34	# of annual disability appeals by outcome
34a	# Denied
34b	# Granted
PENSION CLAIM INFORMATION	
35	# of Pension claims filed annually by benefit:
35a	Veteran's Pension
35b	Survivor's Pension
35c	Housebound
35d	Aid & Attendance

36	Avg # of days to complete pension claim (initial contact to OAA submission)
37	# pension claims filed annually by priority group*: <i>* as defined by federal VA. If not prioritized by OAA please indicate.</i>
37a	Homeless veterans
37b	Terminally ill
37c	Former POWs
37d	Medal of Honor recipients
37e	Extreme financial hardship
38	Total \$ awards granted annually by benefit type:
38a	Veteran's Pension
38b	Survivor's Pension
38c	Housebound
38d	Aid & Attendance
39	Average monthly award granted by benefit type:
39a	Veteran's Pension
39b	Survivor's Pension
39c	Housebound
39d	Aid & Attendance
40	# of pension claims denied by VA annually
41	# of pension claims appealed annually
42	# of pension appeals by level
42a	to VA Regional Office
42b	to Board of Veterans' Appeals
42c	Other (<i>please specify</i>)
43	# of annual pension appeals by outcome
43a	# Denied
43b	# Granted

Federal VA Data Request

In order to examine the performance of the Connecticut Department of Veterans' Affairs Office of Advocacy and Assistance (OAA), we are requesting data be broken out by veteran service organization as well as other forms of representation (attorneys, claims agents, and self-representation).

If possible, it would be helpful to examine workload within OAA district offices and by individual OAA veteran service officer.

We are requesting data for claims submitted by Connecticut veterans and eligible family members and processed by the Hartford Regional Benefit Office only. Please exclude any out-of-state claims.

For comparability, please provide data by state fiscal year (July 1st to June 30th) for FYs 11-15.

GENERAL CLAIMS INFORMATION

- # of new Power of Attorney (POAs) executed annually
- # of Intent to File submitted annually
- # of total claims filed annually (disability compensation #6 + pension #19)
- # of claims filed electronically (eBenefits)
- # of claims filed by mail (paper application)

COMPENSATION CLAIMS INFORMATION

of disability claims filed annually by classification:

- Original disability claim
- New disability claim
- Reopened disability claim
- Claim for increased disability
- Secondary disability claim

of Fully Developed Claims (FDC) submitted annually

of traditional unsupported claims submitted annually

Average # of disabilities per claim

Median # of disabilities per claim

Average disability claim processing time (in days) by type

- # Granted under 60 days
- # granted 60 - 125 days
- # granted over 125 days

disability claims filed annually by priority group:

	Homeless veterans
	Terminally ill
	Former POWs
	Medal of Honor recipients
	Extreme financial hardship
Total \$ awards granted annually by compensation type:	
	Disability Compensation
	Dependency and Indemnity Compensation (DIC)
	Special Monthly Compensation (incl. Aid & Attendance)
	Claims Based on Special Circumstances
Average monthly award granted by compensation type:	
	Disability Compensation
	Dependency and Indemnity Compensation (DIC)
	Special Monthly Compensation (incl. Aid & Attendance)
	Claims Based on Special Circumstances
Median monthly award granted by compensation type:	
	Disability Compensation
	Dependency and Indemnity Compensation (DIC)
	Special Monthly Compensation (incl. Aid & Attendance)
	Claims Based on Special Circumstances
# disability claims denied annually by reason (please provide)	
	#1 Reason
	#2 Reason
	#3 Reason
	#4 Reason
	#5 Reason
	All Other
# of appeals by reason (please provide)	
	#1 Reason
	#2 Reason
	#3 Reason
	#4 Reason
	#5 Reason
	All Other
# of appeals by level	
	to VA Regional Office
	to Board of Veterans' Appeals
	to Court of Appeals for Veterans Claims
	to Court of Appeals with Federal Circuit
	to Supreme Court
PENSION CLAIMS INFORMATION	

# of Pension claims filed annually by benefit:	
	Veteran's Pension
	Survivor's Pension
	Housebound
	Aid & Attendance
Average pension claim processing time (in days) by type	
	# Granted under 60 days
	# granted 60 - 125 days
	# granted over 125 days
# of pension claims filed annually by priority group:	
	Homeless veterans
	Terminally ill
	Former POWs
	Medal of Honor recipients
	Extreme financial hardship
Total \$ awards granted annually by benefit type:	
	Veteran's Pension
	Survivor's Pension
	Housebound
	Aid & Attendance
Average monthly award granted by benefit type:	
	Veteran's Pension
	Survivor's Pension
	Housebound
	Aid & Attendance
Median monthly award granted by benefit type:	
	Veteran's Pension
	Survivor's Pension
	Housebound
	Aid & Attendance
# of pension claims denied annually by reason	
	#1 Reason
	#2 Reason
	#3 Reason
	#4 Reason
	#5 Reason
	All Other
# of pension appeals by reason	
	#1 Reason
	#2 Reason
	#3 Reason
	#4 Reason
	#5 Reason

	All Other
# of pension appeals by level	
	to VA Regional Office
	to Board of Veterans' Appeals
	to Court of Appeals for Veterans Claims
	to Court of Appeals with Federal Circuit
	to Supreme Court

Total veteran population 2015	
Age	
	Under 20
	20 to 24
	25 to 29
	30 to 34
	35 to 39
	40 to 44
	45 to 49
	50 to 54
	55 to 59
	60 to 64
	65 to 69
	70 to 74
	75 to 79
	80 to 84
	85+
Gender	
	Male
	Female
Ethnicity	
	White alone
	Black or African American alone
	American Indian and Alaska Native alone
	Asian alone
	Native Hawaiian and Pacific Islander alone
	Some other race alone
	Two or more races
	Hispanic or Latino (of any race)
	Not Hispanic or Latino
Education level	
	Less than H.S. diploma

H.S. diploma or GED
Some college or Associates
Bachelor's degree or more
Employment status
Employed
Unemployed
Not In Labor Force
Period of service
Pre-WWII
WWII
Korean Conflict
Vietnam Era
Gulf War Era
Post-Gulf War Era
Wartime veterans
Peacetime veterans
of veterans that are disabled

Eligible family member population 2015	
Age	
	Under 20
	20 to 24
	25 to 29
	30 to 34
	35 to 39
	40 to 44
	45 to 49
	50 to 54
	55 to 59
	60 to 64
	65 to 69
	70 to 74
	75 to 79
	80 to 84
	85+
Gender	
	Male
	Female
Ethnicity	
	White alone
	Black or African American alone
	American Indian and Alaska Native alone

	Asian alone
	Native Hawaiian and Pacific Islander alone
	Some other race alone
	Two or more races
	Hispanic or Latino (of any race)
	Not Hispanic or Latino
Education level	
	Less than H.S. diploma
	H.S. diploma or GED
	Some college or Associates
	Bachelor's degree or more
Employment status	
	Employed
	Unemployed
	Not In Labor Force

LEGISLATIVE PROGRAM REVIEW COMMITTEE VETERAN SATISFACTION SURVEY

*To be completed by the person who has filed a claim for federal VA benefits between 7/1/14 – 6/30/15.
If more than one claim was filed please base your answers on your most recent experience during this time.*

1. If not a veteran, how are you related to the veteran in your family?
 - a. Spouse/Widow(er)
 - b. Dependent child
 - c. Dependent parent
 - d. Other: _____
2. What factor was **most** important to you in seeking OAA's assistance with your federal benefits claim?
 - a. Professional reputation
 - b. Level of experience
 - c. Customer service
 - d. Free services
 - e. Convenient location
 - f. Other: _____

Connecticut Department of Veterans' Affairs (CT DVA): Office of Advocacy & Assistance (OAA)

3. How did you first learn about the Connecticut Office of Advocacy & Assistance?
 - a. Family/friend(s)
 - b. Other veteran(s)
 - c. CT DVA Stand Down event
 - d. Other veteran outreach event
 - e. Other CT state agency
 - f. CT DVA website
 - g. Municipal veteran contact
 - h. Nonprofit organization
 - i. Other: _____
4. Where was your OAA services officer located?
 - a. District 1(Newington – VA Hospital)
 - b. District 2 (Norwich)
 - c. District 3 (Milford)
 - d. District 4 (Bridgeport)
 - e. District 5 (Waterbury)
5. Did you meet your OAA services officer in-person to go over your eligibility for veterans benefits?
 - a. Yes
 - b. No (*skip to question #11*)
6. Where did your in-person meeting take place?
 - a. OAA district office
 - b. In the community
 - c. Nursing home/assisted living facility
 - d. My home
 - e. Other: _____
 - f. N/A – didn't have in-person meeting
7. If your meeting was at an OAA office, how did you get there?
 - a. Walked/biked/drove self
 - b. Family/friend drove
 - c. OAA services officer picked me up
 - d. Took public transportation
 - e. Other: _____
8. If you arrived on-time for your scheduled appointment, how long did you wait to be seen?
 - a. Less than 5 minutes
 - b. Between 5 – 15 minutes
 - c. Between 16 – 30 minutes
 - d. More than 30 minutes
 - e. N/A – didn't have an appointment or arrived late to appointment.

9. If you did **not** have a scheduled appointment, were you seen by the service officer during your visit?
- Yes – my needs were taken care of during my visit.
 - No, but I was given a scheduled appointment for another day.
 - No, I was told to call and schedule an appointment.
 - Other: _____
10. During this meeting, did you designate the service officer as your Power of Attorney (POA) to represent you during the claims process for federal benefits?
- Yes
 - No - because: _____
 - N/A - had done so previously
11. Have you ever used another accredited veteran service organization, attorney, or claims agent to file a claim for federal veterans’ benefits?
- Yes
 - No (*skip to question #15*)
12. Compared to other veteran service organizations, attorneys, or claims agents you have used, how would you rate **your satisfaction with OAA** in representing you with your claim for benefits?
- More satisfied
 - Equally satisfied
 - Less satisfied
 - N/A
13. Did you transfer your Power of Attorney **from** another veteran service organization, attorney, or claims agent **to** OAA?
- Yes
 - No
14. At any point in the claims process did you revoke your POA **from** OAA to get assistance from another service organization?
- Yes – because: _____
 - No

Using the scale below, to what extent do you agree with the following statements?					
1 = Strongly Agree; 2 = Agree; 3 = Neutral; 4 = Disagree; 5 = Strongly Disagree	Circle one				
15. My OAA services officer was courteous.	1	2	3	4	5
16. My OAA services officer was professional.	1	2	3	4	5
17. My OAA services officer gave me his or her full attention.	1	2	3	4	5
18. My OAA services officer fully understood veterans’ benefits laws and regulations.	1	2	3	4	5
19. My OAA services officer answered all of my questions.	1	2	3	4	5
20. Looking back, do you feel your OAA service officer clearly explained:					
a. The claims process	1	2	3	4	5
b. Next steps	1	2	3	4	5
c. Your responsibilities	1	2	3	4	5
d. His/her responsibilities	1	2	3	4	5
21. My OAA service officer responded to my calls and/or e-mails promptly.	1	2	3	4	5
22. I was satisfied with OAA’s representation of my claim.	1	2	3	4	5
23. I would use OAA again to file a claim in the future.	1	2	3	4	5
24. Please provide further detail about your experiences and suggestions for improving OAA’s services.					