



November 23, 2020

Dear President-Elect Biden and members of the Department of Veterans Affairs Transition Team,

Concerned Veterans for America is a grassroots advocacy organization that seeks to advance policies that remove barriers to veterans realizing their potential by improving health care quality and access while also advocating for modernizing VA services and programs.

CVA believes the next four years hold significant potential to build upon the successful bipartisan reforms achieved by both President Obama and President Trump to modernize the Department of Veterans Affairs for today and tomorrow's veterans. As you consider legislation and executive priorities to serve our country's veterans, Concerned Veterans for America (CVA), offers the following policy recommendations:

COVID-19 Response

In March, CVA provided a [list of recommendations](#) to policymakers on how the VA can meet the needs of veterans during COVID-19. These recommendations include:¹

- 1. Continue to Provide Regulatory Relief** – Increased flexibility for telehealth and scope of practice for health care providers provides maximum health care accessibility for veterans. The regulatory flexibility granted for health care providers in the early weeks of COVID-19 to increase care capacity at the VA should be made [permanent](#).²
- 2. Prescription Flexibility** - The VA should remove the current 14-day limitation on prescriptions from urgent care providers. This will reduce unnecessary visits to the VA and allow veterans to stay home and limit potential exposure to COVID-19. The VA should also support [legislation](#) that gives greater prescription flexibility for veterans to receive a 90 day supply through community pharmacies during a public health emergency.³
- 3. Ensure Community Care Access** – Across VA, wait times are increasing rapidly. According to the OIG, the [VA cancelled millions of appointments](#) after March 15, 2020 and failed to appropriately follow up with affected veterans.⁴ [CVA's recommendations](#) are that the VA should give veterans options (including non-VA care), communicate clearly, promote transparency, and leverage and educate regarding telemedicine options.⁵

Health Care, Benefits, and Eligibility

- 4. Community Care Networks** - In the coming months, the VA should provide oversight over the Community Care Network (CCN) contracts to ensure adequate network capacity to meet the access standards and the needs of veterans as required by the VA MISSION Act. In particular, the VA

¹ Letter to President Trump, CVA. March 19, 2020. https://mk0wehezuhu1jcn3uqvn.kinstacdn.com/wp-content/uploads/2020/11/Protect-Community-Care_Updated.pdf

² "Authority of VA Professionals to Practice Health Care," Interim Final Rule in Federal Register. November 12, 2020.

<https://www.federalregister.gov/documents/2020/11/12/2020-24817/authority-of-va-professionals-to-practice-health-care>

³ H.R. 6997, Veterans Prescription Flexibility Act. <https://www.congress.gov/bill/116th-congress/house-bill/6997>

⁴ "Post-COVID Backlogs Were Avoidable," CVA. September 4, 2020. <https://cv4a.org/news-media/cva-on-va-ig-report-post-covid-backlogs-were-avoidable/>

⁵ "Defend Veterans' Health Care Choice," CVA One-Pager. Summer 2020. https://mk0wehezuhu1jcn3uqvn.kinstacdn.com/wp-content/uploads/2020/11/Protect-Community-Care_Updated.pdf

should monitor community care authorization and appointment wait times as well as ensure community providers are paid in [a timely manner](#).⁶

5. **Center for Innovation for Care and Payment** – The center was created to infuse new ideas into the VA system to preserve or enhance the care delivered and reduce expenditures, however, currently the center is engaged in only one approved pilot program. The VA should prioritize and continue to develop new pilot programs and submit waiver requests to Congress to identify opportunities for innovation. CVA submitted pilot program [recommendations](#) in a public comment on the proposed rule in August 2019.⁷
6. **Asset and Infrastructure Review Commission** – The process of setting up the commission and necessary criteria will kick off in earnest in 2021. The need for reform is overdue amidst significant infrastructure challenges, changing veteran demographics, and new approaches to delivering care. Modernizing VA's infrastructure needs requires a more nuanced approach than just more dollars and more buildings. The process will require innovation, flexibility, strategic use of community care, and capitalizing on where the VA has clear expertise. Read more in CVA's [explainer document](#) with recommendations for policymakers and key inflection points.⁸
7. **Protect Access Standards** – CVA strongly supports the current access standards for the Veterans Community Care Program. They [closely match](#) access standards for DoD healthcare, other networks and accounts for the differences between primary, specialty, and mental health care.⁹
8. **Expand Health Care Choice** – CVA has always advocated for veterans to have greater decision-making over their health care. CVA will continue to support alternative models like [legislation introduced](#) that utilizes a TRICARE-style care delivery model to give full health care choice to service-connected veterans.¹⁰
9. **Independent Assessment and Commission on Disability Compensation** – The VA's disability system should be modernized and shift from a compensation-focused benefits system towards a greater focus on rehabilitation. In 2014, the VA Choice law created the independent assessment and the Commission on Care to provide analysis and reform proposals to the VA health care system. This same model should be duplicated to examine the VA's disability compensation practices, measure outcomes and effectiveness, study the long-term impact on veterans and provide recommendations for policy change. More details in [CVA's one-pager](#).¹¹
10. **Convene a similar body to examine health care benefits and eligibility** – The Commission on Care recommendation #18 recommended the VA to determine who and what services the VA is best positioned to provide for veterans. The veteran population is changing rapidly and assembling more data and an [expert panel](#) to provide policy reform recommendations should be a priority for the next Administration.¹²
11. **Follow Up on Commission on Care Recommendations** – In 2016, when the Commission on Care completed their recommendations, the Obama Administration agreed with [15 of the 18 recommendations](#).¹³ Four years later, the VA should assess the status of the implementation of those recommendations and where appropriate, take action to continue progress towards modernizing the VA system.

⁶ "Improvements Needed to Help Ensure Timely Access to Care," Government Accountability Office. Sept. 28, 2020.

<https://www.gao.gov/products/GAO-20-643>

⁷ Anderson, Nate. Comment on Proposed Rule. August 29, 2019. <https://beta.regulations.gov/comment/VA-2019-VACO-0021-0009>

⁸ "Realigning the VA's Assets and Infrastructure," CVA Explainer. Nov. 2020. <https://mk0wehezuh1jcn3uqvn.kinstacdn.com/wp-content/uploads/2020/11/Asset-Infrastructure-Review.pdf>

⁹ Caldwell, Dan. Written Testimony for the Senate Veterans Affairs Committee. April 10, 2019. https://mk0wehezuh1jcn3uqvn.kinstacdn.com/wp-content/uploads/2019/04/20190410_CVA-Written-Testimony-for-Veterans-Community-Care-Program_FINAL.pdf

¹⁰ H.R. 6285, the Veterans True Choice Act. <https://www.congress.gov/bill/116th-congress/house-bill/6285/all-info>

¹¹ "Restructure and Improve VA Benefits and Eligibility," CVA One-Pager. February 2020. https://mk0wehezuh1jcn3uqvn.kinstacdn.com/wp-content/uploads/2020/02/CVA_BenefitsEligibility_1pgr.pdf

¹² H.R. 7469, Modernizing Veterans' Healthcare Eligibility Act. <https://www.congress.gov/bill/116th-congress/house-bill/7469>

¹³ McDonald, Robert. Letter to President Obama on the Commission on Care. August 2, 2016. <https://www.blogs.va.gov/VAntage/wp-content/uploads/2016/09/Commission-on-Care-SECVA-to-POTUS-memo-and-enclosure-tech-edit-page-4....pdf>

- 12. Preserve Accountability and Civil Service** – While flawed in initial implementation, the bipartisan [VA Accountability and Whistleblower Protection Act](#) provided much needed reforms to discipline VA employees found guilty of misconduct.¹⁴ Ongoing oversight should be provided in light of concerning IG reports, however, we are confident if implemented correctly, the bill gives the VA the necessary tools to protect whistleblowers and hold poor performing employees accountable.
- 13. Audit the VA** – Spending at the VA has grown exponentially over the last decade under the leadership of both President Obama and President Trump. Where and how dollars are being spent should be subject to an independent audit to examine how to slow spending and identify waste and efficiencies.
- 14. Economic Independence** – Trends in the newest generation of veterans are concerning, with low return-to-work ratios and a high number of veterans seeking disability compensation. CVA supports identifying what the VA can do to foster greater economic independence in the veteran community by looking at the current transition process, connecting veterans to job opportunities, removing licensing barriers, and promoting greater self-sufficiency and avoiding perverse incentives that can lead to dependency.

Thank you for the opportunity to share policy recommendations for how we can ensure veterans have access to the care and benefits they have earned and deserve. We look forward to continuing to work together on behalf of our nation's veterans.

Sincerely,



Nate Anderson
Executive Director
Concerned Veterans for America

¹⁴ "Preserve Accountability and Civil Service Reforms," CVA One-Pager. February 2020. https://mk0wehezuhu1jcn3uqvn.kinstacdn.com/wp-content/uploads/2020/02/CVA_Accountability_1pgr.pdf