Training Reminder/Advisory: Veterans Information Solution (VIS) as the Authoritative Source for Service Information and Development Procedures

December 19, 2019

What Changed: On May 29, 2017, VA issued the Department of Veteran Affairs' Memorandum which deemed VADIR (VA-DoD Identity Repository) the authoritative source for all active service periods effective January 1, 2015. Beginning in 2015, Department of Defense (DoD) ceased generating paper DD Form(s) 214 and began issuing them electronically. In kind, VA has directed all business lines to discontinue requesting Veterans to provide a DD-214 for service ending on or after January 1, 2015, and rely upon the service information electronically reported to VA. The Veterans Information Solution (VIS) contains information supplied by Defense Manpower Data Center (DMDC) from the service components to VADIR organized for specific business needs. The VIS Education page has been developed for Education Service. The VIS Military History page contains additional service information and certain Beneficiary Identification and Records Locator Subsystem (BIRLS) information necessary for claims processing. DMDC is continuously working with DoD to improve the quality of service data reported to VA with a goal of 100% accuracy.

RPO Impact: Regional Processing Offices (RPO) rely upon service data to determine benefit eligibility. Issues with data quality have increased our dependency on time consuming service verification through our DoD service point of contacts (POC) using Education Development Management System (EDMS). With a few exceptions, the information in VIS is the same information our POCs have in their systems.

RPO Benefit: Although data quality is not yet at 100%, Veterans Claims Examiners (VCEs) should not routinely question service information in VIS. Overall timeliness will improve when unnecessary development is reduced or eliminated.

What RPO Action is Needed: The information provided in VADIR (or VIS) must be used as the authoritative source for active duty reported on or after January 1, 2015. Furthermore, service data is continuously being improved. Any newly updated information in VIS for an earlier service period, should be considered valid and authoritative unless there is other evidence on file which indicates reporting may be inaccurate or incomplete. In such instances, development would be required.

Question 1: If the VIS does not have exclusion periods reported, should we consider the VIS absolute and consider the inconsistency verified?

Response 1: No, the absence of information is not a confirmation. When a kicker, College Loan Repayment Program (LRP), or any other exclusion is indicated on an application but not in VIS, further development using DPRIS, to the claimant, and when appropriate to the service, is necessary unless the indication on the application can be rationalized as not valid or irrelevant. Not valid applies when other reference materials provide conditions for when the disclosure could not be possible. Some examples

include LRP for members of the Marines and Coast Guard, a non-prior service officer or member of the Air Force reporting an active duty kicker, and exclusions for a service academy or ROTC for an enlisted service member. Irrelevant examples are buy-up when requesting chapter 33, a 1606 kicker when no longer in the selected reserve, or an exclusion period for a claimant with more than 3 years of creditable service in addition to the exclusion period in question.

Development to confirm service periods or exclusion periods (including entry or skill level training) which have no effect on eligibility should be avoided. Instead, add a note to clearly document the justification in the file as to the specific reason why development is unnecessary and process with the verified information on hand necessary to make a determination. For chapter 33 claims, also indicate in the comments section of the Long Term Solution (LTS) the same detailed justification to inform a reviewer both for authorization and quality checks.

Question 2: We have a DoD response from 2014 which now conflicts with current VIS, which source prevails?"

Response 2: Updated information in VIS should be considered reliable. In other words, if a previously captured VIS record did not contain newly reported information, or the Military History page contains a reported segment as erroneous and on the Education page the period has updated or been removed – use the new information in VIS without additional clarification. However, a DoD response should not be dismissed without unmistakable evidence of new reporting as previously described or good cause. Good cause examples include earlier DoD responses to development with "unable to verify" or USAR title 10 service periods not previously reported. For the latter, new reporting of creditable service should be accepted without question since we have been informed USAR revised their policy for reporting. Decisions involving changes in eligibility require at least 2 signatures (M22-4, Part 3, Chapter 1.19) and must be properly documented. (See Big Pay guidance in the M22-4, Part 3, Chapter 1.20 for documentation requirements and when additional signatures must be in the file prior to releasing payments.)

Question 3: A claimant submitted a DD214 for the period January 15, 2019, through May 15, 2109. The VCE is reviewing the claim well over 30 days after the DD214 release date, yet the VIS is still reporting the claimant on duty. What action should the VCE take?

Response 3: This is an example which indicates the VIS is incomplete, therefore, development is required.

Development guidance is located in M22-4, Part 3. NOTE: Sections of this chapter (including 3.12 & 3.13) are under review for revision based upon policy changes

communicated in advisories which supersede M22-4 guidance until updated, including but not limited to those identified below.

<u>Validating DoD Development</u> – is an ongoing process.

VADIR as Authoritative Source for All Active Service Periods after January 1, 2015.

Selected reserve full-time service periods reported in the VIS should be considered valid and authoritative. Service period segments on the Education page containing either a '98' (Cannot determine qualifying period. Data quality issue in transaction.) or '99' (Unknown/Not Applicable) eligibility code and those project codes on the Military History page identified below do require DoD development. Validation of the following service periods reported as statue code "C" is required:

- Navy Reserve if the project code for the period is "A21".
- Marine Corps Reserve if the begin date of active duty is BEFORE January 1, 2016 and the project code is either "A22" or "A99".
- Army National Guard if the project code is "A25".

UPDATE: Effective August 1, 2019, discontinue verification of Air National Guard project code "A99" along with any other training reported as statute code "C" in the VIS.

Kickers: Procedural Advisory: Kicker Development 2019 Update

Kicker Development Table (Updated, December 2019):

VIS	Kicker Claimed on Application	Kicker Code	Instructions
Kicker reflected	N/A	Does not require confirmation	Process kicker
Kicker reflected	N/A	Requires confirmation per chart	Develop to DoD only
No Kicker reflected	No	N/A	Process without kicker
No chapter 30 kicker reflected	Yes	N/A	Develop using DPRIS and Claimant for a contract. Process with a contract dated on EOD. Verify contracts which are signed on any other date with DOD.
No chapter 1606 kicker reflected	Yes	N/A	Develop using DPRIS and Claimant for a contract. Verify with DOD after a chapter 1606 contract is received.

Chapter 1606: Notice of Basic Eligibility (NOBE) DD Form 2383-1 and DD Form 2384-2

MGIB-SR Kicker Obligation Agreement – Chapter 1606, Development and Claims

Processing Procedures

System Advisory: VIS - New Codes Displayed Under "Eligibility Code"

System Advisory: VIS - 30D and DOD Screen Information Displayed in VIS

When development is required, claims processors must follow local procedures using the EDMS to request specific information from the service departments as well as a development letter to the claimant explaining what information is missing.

Questions: If there are additional questions regarding this training reminder, contact the National Training Team at EDUOPERMGMT.VBAVACO@va.gov, using NTT-P in the subject of the email.

V/R

National Training Team - Processing

Education Service