



PERSONNEL AND
READINESS

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

MAY 21 2015

The Honorable Johnny Isakson
Chairman
Committee on Veterans' Affairs
United States Senate
Washington, DC 20510

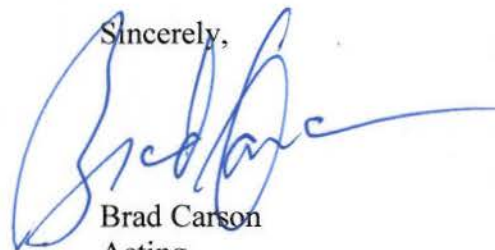
Dear Mr. Chairman:

The enclosed report responds to section 524(c)(2) of the National Defense Authorization Act for Fiscal Year 2013 (Public Law 112-239), which requires an annual report on a plan to assess and monitor the quality assurance programs of the Military Departments to evaluate the performance of duties of the Medical Evaluation Boards (MEBs), Physical Evaluation Boards (PEBs), and the Physical Evaluation Board Liaison Officers and ensure accuracy and consistency of the determinations and decisions of the MEBs and PEBs. The enclosed report details the implementation status of the Department's plan, delivered to Congress in August 2013, to standardize the Disability Evaluation System (DES) quality assurance programs (QAPs) across the Military Departments.

The Department of Defense is on track to implement the DES QAP as outlined in the August 2013 plan and has made significant progress in meeting the planned milestones. The Department recognizes quality assurance is an ongoing process, and is a crucial component within the disability evaluation process in achieving more accurate and consistent decisions and outcomes for Service members. Once fully operational, the Department's DES QAP will provide a standardized, comprehensive, and multidimensional process improvement framework for the Military Departments. The Department will annually report to the Congressional Committees on the disability evaluation QAP's implementation and results until July 2017.

Thank you for your interest in the health and well-being of our Service members, veterans, and their families. Similar letters are being sent to the Chairmen of the appropriate committees of Congress, as defined by section 524(c)(3).

Sincerely,



Brad Carson
Acting

Enclosure:
As stated

cc:
The Honorable Richard Blumenthal
Ranking Member



PERSONNEL AND
READINESS

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

MAY 21 2015

The Honorable John McCain
Chairman
Committee on Armed Services
United States Senate
Washington, DC 20510

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Sincerely,

Brad Carson
Acting

Enclosure:
As stated

cc:
The Honorable Jack Reed
Ranking Member



PERSONNEL AND
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UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

MAY 21 2015

The Honorable William M. "Mac" Thornberry
Chairman
Committee on Armed Services
U.S. House of Representatives
Washington, DC 20515

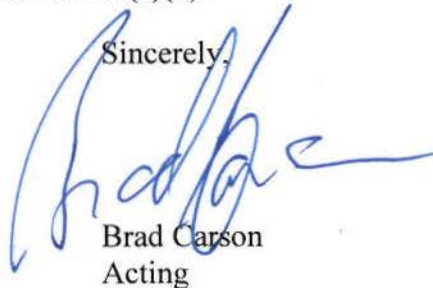
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Sincerely,



Brad Carson
Acting

Enclosure:
As stated

cc:
The Honorable Adam Smith
Ranking Member



PERSONNEL AND
READINESS

UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, DC 20301-4000

MAY 21 2015

The Honorable Jeff Miller
Chairman
Committee on Veterans' Affairs
U.S. House of Representatives
Washington, DC 20515

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Sincerely,

Brad Carson
Acting

Enclosure:
As stated

cc:
The Honorable Corrine Brown
Ranking Minority Member



Report on the Implementation of the Disability Evaluation System Quality Assurance Program (2015 Status Report)

Required by: National Defense Authorization Act for FY 2013 (Public Law 112-239), Section 524

Preparation of this report/study cost the Department of Defense a total of approximately \$18K in Fiscal Years 2015. Generated on 2015Apr16 RefID: 8-E48E8D4

EXECUTIVE SUMMARY

This report summarizes the status of Department of Defense (DoD) actions to standardize, assess, and monitor the Military Departments' Disability Evaluation System (DES) Quality Assurance Program (QAP) as directed by section 524 of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2013. When fully implemented, the DES QAP will:

- 1) Standardize disability evaluation quality assurance requirements for the Military Departments,
- 2) Enable DoD to assess, monitor, and improve the accuracy and consistency of the determinations and decisions of Medical Evaluation Boards (MEBs) and Physical Evaluation Boards (PEBs), and
- 3) Monitor MEBs, PEBs, and Physical Evaluation Board Liaison Officers (PEBLOs) and sustain their proper duty performance.

Section 524 of the NDAA for FY 2013 also directed the Secretary of Defense to submit to Congress annual reports on implementation status for the four years following the submission of a disability evaluation quality assurance plan. DoD delivered a DES QAP plan to Congress in August 2013. The current report is the second annual update to Congress on the status of implementing that plan.

As described in the Department's August 2013 DES QAP report, DoD collaborated with the Military Departments to establish a quality assurance program that supports the DES staffs in their understanding and execution of the DES, and provides a mechanism to evaluate if MEBs and PEBs reach accurate and consistent disability decisions. The Department drew lessons from the Department of Veterans Affairs (VA) and Social Security Administration (SSA) QAPs, and assessed industry standards to create a DoD-level DES QAP encompassing four functions. A description of the four quality assurance program functions follows:

- **Quality Planning** –
 - Establishing guiding principles by which disability evaluation quality assurance processes will be carried out; and
 - Identifying standardized mechanisms to evaluate the accuracy and consistency of decisions and assess the proper performance of duties.
- **Quality Assurance** –
 - The formalized processes and procedures to evaluate the accuracy and consistency of decisions;
 - The mechanisms to measure and evaluate personnel and processes;
 - The frequency of executing quality assurance activities; and
 - Formalized evaluation criteria to ensure the Military Departments use standardized instruments to measure the congressionally established objectives.
- **Quality Control** – The collection of data, as well as data analysis to identify performance gaps and areas for improvement.
- **Quality Improvement** – The actions taken to resolve identified performance deficiencies, gaps, and areas of improvement.

This report includes the status for implementing activities categorized under these four quality assurance functions. DoD is utilizing data collected through ongoing customer satisfaction surveys and performance databases that are used across all Military Departments. In FY 2014, DoD began collecting data on case level reviews and Military Department quality improvement

activities. In FY 2015, DoD began the Initial Operating Capability (IOC) period for post-process and consistency case reviews, as well as conducting meetings for gathering data and feedback from DES key stakeholders. Data from these sources is synthesized into quality metrics that serve the basis for the DES QAP Quarterly Report that was first published during FY 2015. The DES QAP should move into full implementation during Full Operating Capability (FOC) beginning FY 2016.

The Department is on track to implement the DES QAP as outlined in the August 2013 plan reported to Congress and has made significant progress in meeting the planned milestones. The Department recognizes quality assurance is an ongoing process, and is a crucial component within the disability evaluation process in achieving more accurate and consistent decisions and outcomes. Ultimately, more accurate and consistent decisions throughout the disability evaluation processes should result in a better overall disability evaluation experience for Service members. Once fully operational, the Department's DES QAP will provide a standardized, comprehensive, and multidimensional process improvement framework for the Military Departments.

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1. OVERVIEW

In section 524 of the NDAA for FY 2013, Congress directed the Secretary of Defense to standardize, assess, and monitor the Military Departments' QAPs to evaluate the duty performance of MEBs, PEBs, and PEBLOs. Congress further directed the Secretary of Defense to submit a quality assurance implementation plan not later than 180 days after the date of NDAA enactment and annual reports assessing implementation progress for the four years following the submission of the plan.

The DoD delivered the DES QAP implementation plan to Congress in August 2013, followed by the first status report on implementation in August 2014. This report provides the second annual status report and summarizes the progress DoD made during FY 2015 implementing the DES QAP.

Congress established two objectives for the DES QAP:

1. Ensure accuracy and consistency in the determinations and decisions of MEBs and PEBs.
2. Monitor and sustain the proper duty performance of MEBs, PEBs, and PEBLOs.

Leveraging best practices from existing Military Department DES quality assurance programs, industry, and the quality assurance methods of the two largest Federal disability benefits programs – the VA and the SSA – DoD established standard disability QAP requirements across the Military Departments based on four key quality assurance functions.

Quality Planning – Establish guiding principles for executing DES quality assurance processes. Quality Planning includes establishing guiding principles by which disability evaluation quality assurance processes will be carried out; identifying standardized mechanisms to evaluate the accuracy and consistency of decisions and assess the proper performance of duties. As detailed in the following section, DoD published new issuances in FY2014 that define:

- DES QAP goals and objectives
- Roles and responsibilities
- Disability case review and reporting guidelines
- Quality improvement activity reporting guidelines

Quality Assurance – Establish standard methods and metrics for quality measurement activities. Case reviews to assess accuracy, consistency, and proper duty performance form the second cornerstone of DoD's disability evaluation QAP. DoD establishes standards as thresholds, minimum expected levels for DES accuracy, consistency, and proper performance of duties that are periodically assessed and adjusted as necessary. DoD's program requires the Military Department to execute or facilitate three types of quality assurance case reviews:

- *In-process case reviews of disability evaluation processes* – Each Military Department must conduct quality checks of the disability evaluation activities that occur prior to the Secretary's final disability decision. These in-process case reviews enable the Military Departments to identify and correct errors in individual, active disability cases prior to Secretarial review and approval of final disability case determinations. The reviews also enable DoD and the Military Departments to identify broader areas for improvement.
- *Consistency reviews* – Independent reviews of the consistency of PEB decision-making across Military Departments. Cases are constructed and provided to PEBs from each Military Department, which adjudicate the cases online. An independent DoD entity

separate from the Military Departments' disability evaluation organizations reviews the PEBs' decision-making to identify differences in how identical cases are evaluated across the Military Departments.

- *Post-process case reviews*– Reviews of real cases prior to the promulgation of the Military Secretary's decision on a Service member's disability case. These reviews are executed using a random sample that is representative of total caseloads. These reviews are carried out by a review entity chosen by each Military Department (consisting of personnel not previously involved in the review and adjudication of the sample cases) to review the cases before the final decisions are approved by the Military Secretary.

The Department uses data from Integrated Disability Evaluation System (IDES) Customer Satisfaction Surveys as one source to evaluate the duty performance of PEBLOs as perceived by the Service member. DoD recognizes that customer service satisfaction surveys are not a definitive measure of PEBLO duty performance because Service members' expectations for desired outcomes can influence their perception of how PEBLOs perform their duties. However, DoD believes customer satisfaction survey data provides useful information about duty performance and will help identify areas that require improvement, as well as more broadly providing the perspective of the Service members whom the IDES process is intended to support. Also, DoD will collect baseline information to serve as a basis for quality improvement initiatives by meeting directly with targeted stakeholders to gather detailed information on MEB and PEB performance.

Quality Control – Execute data collection and analyses to measure current performance according to agreed-upon evaluation criteria. Prior to implementing the DES QAP, the Department utilized data from IDES Customer Satisfaction Surveys, Stakeholder Surveys, and VA's Veterans Tracking Application IDES module to evaluate MEB, PEB, and PEBLO performance. The Department will continue to use these types of data as well as data collected through the newly implemented in-process, post-process, and constructed case reviews to evaluate the accuracy and consistency of MEB and PEB decisions and assess duty performance. Customer satisfaction survey data is incorporated into the suite of quality metrics as an indication of the Service members' perception of the quality of services they receive from the MEB, PEB, and PEBLOs. DoD is revising and updating the IDES Customer Satisfaction Survey and Stakeholder Survey data collection tools to improve measurements of satisfaction for Service members, families, and stakeholders. The indices described above for accuracy, consistency, and performance of duty allow comparisons across Military Departments, and are reported in the DES QAP Quarterly Report and incorporated in the DES Annual Report.

Quality Improvement – Resolve identified performance deficiencies, gaps and areas of improvement. DoD and the Military Departments' DES staff routinely engage in a number of activities focused on gauging the extent of performance deficiencies, identifying the causes of these deficiencies, and testing and implementing appropriate solutions. These include a broad range of activities, and for the purposes of an established quality assurance program, they are considered a part of the Quality Improvement function. DoD is engaging with the Military Departments on an ongoing basis to identify and track the implementation of their quality improvement activities, such as training to address identified performance deficiencies or process improvement to address identified process deficiencies. DoD also implements DoD-wide solutions to address recognized deficiencies, such as updates to common PEBLO training standards and policy clarifications.

This report focuses on the status of the Department’s plan to implement these four functions of the DES QAP. Integration of these four program components with routine operations will institutionalize quality assurance activities and serve as the primary mechanism for continual performance improvement of the DoD DES.

The four functions described above have been benchmarked against the structure and operations of similar QAPs with other organizations. Most notably, these functions are consistent with those of the VA and the SSA that administer similar type programs for providing compensable benefits to disabled populations. These four functions are also found in healthcare organizations’ quality assurance programs and other federally funded healthcare programs, such as Health Resources and Services Administration’s Health Center Program. Warrior Care Policy (WCP) staff met with leadership from these quality assurance programs to learn how they have implemented their activities and to build upon their best practices and experiences.

2. STATUS OF IMPLEMENTATION

DoD has made significant progress implementing and standardizing the DES QAP across the Military Departments since delivery of the Department’s plan to Congress in August 2013. The following section describes the activities that support institutionalizing the QAP functions across the Military Departments, as well as a number of preliminary activities completed for implementation of a robust and comprehensive DES QAP.

2.1. QUALITY PLANNING

DoD published Department of Defense Instruction 1332.18, “Disability Evaluation System (DES)” and accompanying Department of Defense Manuals (DoDM) Volumes 1 and 2 on August 5, 2014. These issuances established objectives, roles, responsibilities and guidelines for executing DoD’s DES. In November 2014, DoD published DoDM 1332.18, Volume 3, “DES Manual: Quality Assurance Program (QAP),” to implement DoD QAP policy, assign QAP responsibilities, and provide QAP procedures for the DES. Together these documents establish the guiding principles for evaluating seriously wounded, ill, or injured Service members for disability and for ensuring the quality of evaluation outcomes.

Status: Completed – DoD published DoDM 1332.18, Volume 3, on November 21, 2014. DoD also incorporated quality planning as a regular topic at the Department’s quarterly Disability Advisory Council (DAC) meeting.¹ **Upcoming** – DoD Manuals and Instructions will be periodically reviewed and updated as needed in the future.

2.2. QUALITY ASSURANCE

Quality assurance establishes a standardized approach, methodology, and set of metrics for quality measurement activities. Over the past year, DoD developed quality assurance procedures that review the accuracy and consistency of MEB and PEB decisions and evaluate the extent to which MEBs, PEBs, and PEBLOs properly execute their duties as defined in DoD policy. DoD also developed training standards and performance objectives to be adopted across Military Departments for all PEBLOs and MEB and PEB members as a basis to improve their performance.

2.2.1. DES Case Reviews

¹ Under Secretary of Defense (Personnel and Readiness), Charter: Department of Defense Advisory Council (DAC) Disability Evaluation System (DES), October 2013.

DoD's DES QAP plan requires the Military Departments to execute three types of disability case reviews to measure the accuracy and consistency of MEB and PEB decisions. These reviews occur at specified points throughout the DES process and provide additional assurances of board outcomes. To institutionalize a standardized review process across the Military Departments, DoD policy defines case review evaluation criteria, sampling protocols, review schedules, and reporting requirements.

DoD developed a standardized QAP checklist as a tool for evaluating cases based on DoD policies that are defined in the DES issuances. Collecting data using the QAP checklist will be the basis for a core of program metrics to develop comparative scores of accuracy, consistency, and proper performance of duties. The checklist has been vetted with the Military Departments to ensure that content and language is appropriate and applicable to each Department's environment. Checklist items have been tested as valid and reliable measures of DoD policy compliance and will continue to be updated as necessary.

In-Process Case Reviews. DoD DES QAP policy requires the Military Departments to carry out in-process case reviews, and beginning in 2014, to report quarterly to DoD the results of these reviews. DoD guidance establishes the following minimum reporting requirements: the percentage and number of case files reviewed during the IDES process prior to the PEB determination; the percentage and number of cases returned to the MEB from the PEB due to critical errors; an evaluation of case preparation that enables proper PEB adjudication; and qualitative feedback on trends identified throughout the in-process quality assurance effort.

Status: *Completed* – The Military Departments began quarterly reporting for Q1 FY 2014 on preliminary results of these reviews as input for the DES QAP Quarterly Report. In Q4 FY 2014 DoD provided the above additional standardized data elements to be collected and, starting in FY 2015, the Military Departments began reporting the additional data on a quarterly basis.

Upcoming – Military Departments will continue to report on the results of their in-process case reviews, and DoD will continue to publish these reports in the DES QAP Quarterly Report.

Post-Process Case Reviews. DoD QAP policy also requires the Military Departments to establish procedures for and report on the results of independent reviews of a sample of post-process disability evaluation cases and describes the annual sampling requirements and procedures for the post-process case review. To ensure that each case in the total population has an equal probability of selection, the policy requires that the Military Departments randomly select a sample of cases from the DES inventory that have a final disposition date. Disability evaluation cases pending appeal decisions are not included in the post-process case review inventory. DoD issued the first annual sampling plan on July 8, 2014, based on the DES inventory totals for the prior fiscal year, and anticipates setting sample size annually using a specified survey sample size formula applied to the Military Departments' annual caseload against a specified inference model (see Appendix 1 for a description of the sampling model). The case file selection is representative of the target population and is based on all cases in inventory with a final disposition.

The Department's DES QAP policy provides standard evaluation criteria and checklists for conducting these post-process case reviews. DoD's policy requires the Military Departments to conduct the post-process case reviews using a separate review entity that exclusively consists of personnel who have not previously pre-viewed, reviewed, or been involved in the disability adjudication determination of the sampled cases. These reviews ensure that Service members' disability evaluation cases are impartially reviewed for accuracy and consistency. The results are provided to the Military Department Secretary command, who may adjust the case outcomes

accordingly. The Military Departments conduct the post-process case reviews on a monthly basis to allow analysis on the determinations made by the PEB and its review of MEB-provided case materials, and identifies patterns and trends rather than anomalies.

Status: *Completed* – Each Military Department has developed its capabilities to fulfill this requirement by the IOC implementation period beginning Q4 FY 2015. Departments of Air Force and Navy began a pre-IOC testing period in the Q2 FY 2015 to test processes and procedures in advance. ***Upcoming*** – Each Military Department will submit quarterly reports to DoD on the results of their post-process case reviews. The results will be included in the DES QAP Quarterly Report.

Consistency Reviews. DoD instituted consistency reviews starting Q1 FY 2015, focusing on high priority issues, specific conditions that can be challenging from the standpoint of policy or medical evaluation, and other themes specified by the Department or Congress. DoD tasked the Air Force Physical Disability Board of Review (PDBR) to evaluate the consistency of PEB decision-making across Military Departments. The PDBR provides a degree of separation from the Military Departments' DES process and employee staff who are subject matter experts familiar with the DES process and DoD policies. The PDBR constructs mock disability evaluation cases to allow for the evaluation of adjudication consistency for high interest DES themes. The Military Department PEBs adjudicate and return the cases to the PDBR for consistency scoring. The PDBR evaluates their decisions and determinations using standardized evaluation criteria. DoD analyzes the outcomes of these reviews to determine the degree of alignment with policy across the Military Departments. The results will help the Department identify any inconsistencies in the application of laws and policy across the Military Departments and serve as a source to reduce such variation through training or clarifying and strengthening policies, regulations, and procedures. At this time, consistency reviews focus on assessing consistency of PEB determinations only. DoD may, at some future point, also require independent assessment of the consistency of MEB determinations.

Status: *Completed* –IOC period began in FY 2015 (October 1, 2014), in which DoD is testing the application of the presumption of fitness and presumption of sound condition. The PDBR provides WCP a report on consistency trends and analysis from the Constructed Case Reviews on a quarterly basis, as well as ad hoc reports as required. ***Upcoming*** –FOC period will begin in FY 2016 (October 1, 2015). DoD is collecting other possible areas of review for upcoming periods from Military Department suggestions and needs for information.

2.2.2. Performance Measurement

DoD disability evaluation policy will also direct the measurement of the duty performance of MEBs, PEBs, and PEBLOS against the standards defined in DoD policy. DoD is leveraging existing data sources to measure key aspects of performance and to analyze longitudinal trends to identify areas that require performance improvement.

DoD synthesizes data collected through the methods described in this section into scores that represent levels of accuracy and consistency of MEB and PEB determinations, and the duty performance of MEBs, PEBs, and PEBLOS.

- Accuracy Scores for DoD disability determinations – DoD will derive a disability determinations accuracy score from the standardized QAP checklist items that assess whether the PEB made accurate final determinations based on DoD-wide policy. DoD

will collect this data through application of the checklist in post-process case reviews, beginning in Q4 FY 2015.

- Consistency scores for DoD disability determinations – DoD derives a disability determinations consistency score from the standardized QAP checklist items that assess how consistently PEBs apply DoD-wide policy across Military Departments for specific themes of interest. This data is collected through application of the checklist in Constructed Case reviews.
- DoD proper performance of duty scores – DoD derives separate disability duty performance scores for MEBs, PEBs, and PEBLOs from the following data sources:
 - The Proper Performance of Duties section of the standardized QAP checklist
 - In-process case review scores
 - Veterans Tracking Application metrics scores
 - IDES Customer Satisfaction Survey scores

IDES Customer Satisfaction Surveys. The Department is using data from IDES Customer Satisfaction Surveys as one source to evaluate the duty performance of PEBLOs as perceived by the Service member. Additionally, the Department implemented meetings with DES stakeholders to gather detailed information on MEB and PEB performance to serve as an additional basis for quality improvement initiatives.

Status: Completed – The Department is currently utilizing IDES customer satisfaction survey data to calculate a proper performance of duties metric. PEBLO performance scores are based on Service members' perception of their PEBLO(s), and are categorized to measure the level of informative, knowledgeable, or timely performance. These scores are included in the DES QAP Quarterly Report. The Department continues to make improvements to the IDES Customer Satisfaction questionnaires and reports to obtain more actionable information. Additionally, during FY 2015, DoD implemented meetings to gather more detailed information from MEB and PEB members on their perceptions of policy and procedures, and to identify potential areas for quality improvement activities, e.g., policy clarification, training, etc.

Veterans Tracking Application Data. DoD disability policy establishes timeliness goals for MEB, PEB, and PEBLO duties. DoD and VA use the IDES module of VA's Veterans Tracking Application to track timeliness metrics and process outcomes for Service members in the IDES. DoD aggregates and reports Veterans Tracking Application IDES data for the Military Departments and all DoD against policy-defined timeliness goals. The Department is using data from the IDES module of VA's Veterans Tracking Application as another source to evaluate the duty performance of PEBs and PEBLOs. In addition, DoD collects and reports data on the types and number of process errors throughout different phases of the IDES process.

Status: Completed – In FY 2014, the Department began to aggregate the IDES Veterans Tracking Application data and incorporated metrics and graphs into the DES QAP Quarterly Report, which began quarterly publication in February 2015 with data from Q1 FY 2015.

2.2.3. Standardized Training

Well-defined training standards are an essential component to the Department achieving better performance of MEBs, PEBs, and PEBLOs in the execution of their duties and reducing variance of MEB and PEB disability determinations. DoD policy provides minimum requirements for training PEBLOs and MEB and PEB members. The Military Departments are responsible for implementing standardized training and performance objectives to meet these requirements. In order to standardize training across the Military Departments, the Department is developing

training standards and performance objectives for the skills that MEB and PEB members and PEBLOs need to perform their duties. DoD is developing these training standards and performance objectives based on new policy and issuances published in FYs 2014 and 2015. Additionally, the Military Departments provide specific or tailored training, where needed, to address process errors, decision inconsistencies, and other notable trends identified through the metrics described in this section.

Status: *Completed* – DoD published PEBLO training standards and performance objectives in August 2013 and has updated these standards based on new policy and issuances published in August 2014. In FY 2015, DoD will develop similar standards for other roles in the IDES process.

2.3. QUALITY CONTROL

Quality control activities focus on data collection and analysis to measure current performance according to agreed-upon evaluation criteria. In this reporting period, DoD added case reviews that will allow DoD to evaluate the accuracy and consistency of MEB and PEB decisions and the proper performance of duties of the MEBs, PEBs, and PEBLOs. Analysis of program data supports quality improvement activities by providing leaders with essential information to identify performance shortfalls and implement improvements in process and performance. Upon full implementation of DES QAP data collection, the Military Departments will report the outcome of case reviews to the Department on a quarterly basis. DoD will combine these results with inputs from VA's Veterans Tracking Application and IDES Customer Satisfaction Surveys, to develop a series of QAP scores. The implementation status of these quality assurance activities is provided in Section 2.2.1. DoD is collecting and analyzing data from the following sources to measure disability evaluation performance against Department policy:

- In-Process Case Review
- Post-Process Case Reviews
- Consistency Reviews
- Customer Surveys
- Veterans Tracking Application Data

Status: *Completed* – DoD currently uses Customer Surveys and meetings to gather data and measure the perceived satisfaction of Service members, MEB and PEB members, PEBLOs, and key stakeholders with the DES process. Likewise, DoD uses Veterans Tracking Application data to measure stakeholder performance. The DES QAP synthesizes the data from these sources as well as the three types of case reviews described above to derive a set of quality metrics that are reported in the DES QAP Quarterly Report.

2.4. QUALITY IMPROVEMENT

The quality improvement function of the Department's DES QAP will focus on a broad range of activities intended to resolve problems and improve performance. DoD's disability evaluation quality improvement activities are ongoing, implemented in full collaboration with the Military Departments, and will provide the basis for continuous process improvement of the Department's disability evaluation system.

Since informing Congress in August 2013 of the DES QAP plan, the Department published PEBLO training standards and gathered reports on Military Department quality improvement activities in the DES processes. Quality improvement activities are a way to document and

discuss performance issues, as well as disseminate lessons learned and best practices to leverage experience across the Military Departments, resolve problems, and increase program effectiveness. Quality improvement is based on the metrics established in the other quality functions; these documented improvements complete the cycle by informing WCP on needs for policy revisions and clarifications, refinement of metrics and measurement methods, and implications for changes of the inputs, processes, and outcomes of the overall system.

- **Defined Training Standards and Performance Objectives** – DoD, in collaboration with the Military Departments, is developing the Warrior Care Training Standards and Performance Objectives Guidebook. This guidebook will help PEBLOs and MEB and PEB members prepare and provide best-in-class support and services to our nation’s recovering Service members. The guidebook will provide the minimum DoD-level standards for PEBLO, MEB, and PEB training to ensure DoD-wide consistency to which PEBLOs and MEB and PEB members must adhere to.
- **Targeted Reviews** – DoD periodically conducts targeted reviews of disability evaluation issues, such as adjudication of posttraumatic stress disorder cases and presumption of sound condition cases. These reviews collect data and information to assist DoD to gain insights that may be used as a basis for changes to DoD policy and procedures. As appropriate, metrics used for these reviews may be included in future routine data collection for the DES QAP to ensure resolved problems do not return after a review is concluded.
- **Veterans Tracking Application Data Quality Control Checks** – WCP staff regularly assess the completeness and accuracy of Veterans Tracking Application data entry, as this is a performance requirement for PEBLOS, PEB Administrators, Military Service Coordinators, and Disability Rating Activity Site raters. For those case records where errors or inconsistencies are found, WCP staff reach out to PEBLOs and supervisors to correct errors and to provide any needed clarification. This continual quality control check allows clarification of policy and regulation and helps to maintain the highest degree of Veterans Tracking Application data integrity possible.
- **Benchmarking** – Benchmarking is the process of comparing the Department’s program with the QAPs of similar organizations. DoD began the process of developing the Department’s DES QAP by interviewing and meeting with representatives of programs at VA and SSA. DoD continues to meet, as appropriate, with VA and SSA representatives to compare activities and identify quality assurance best practices. The best practices are useful for the Department’s improvement of the four functions of the DES QAP.
- **Department quality improvement committees** – DoD has traditionally used oversight committees that meet on a regular schedule as a venue for presenting disability evaluation data to the Military Departments and other stakeholders to discuss and develop improvement strategies for performance issues. The DAC and the Disability Evaluation System Improvement Working Group address high-interest items, actions taken by DoD or the Military Departments to address performance issues, and the results of such improvement activities. These ongoing activities are an essential component of quality improvement activities and provide broad outreach opportunities and a forum for discussing how to institutionalize improvements as a part of continuous process improvement.

- **Disseminate Lessons Learned and Best Practices** – DoD is collecting information from the Military Departments to identify and track their quality improvement activities. DoD disseminates these lessons learned and best practices via the DES QAP Quarterly Reports in order to relay valuable information for resolving problems and addressing issues.

Status: Completed – DoD and the Military Departments continue to capture and share quality improvement activities to further improve performance across the DES process as a part of the ongoing DES QAP structure.

3. SUMMARY

The Department is committed to implementing the DES QAP as outlined in the August 2013 plan reported to Congress and has made significant progress in meeting the planned milestones to fully implement its plan to standardize, assess, and monitor the Military Departments' disability evaluation QAPs. DoD has implemented a phased rollout of the DES QAP to support the disability evaluation staffs in their understanding and execution of the disability evaluation process, and to ensure that the MEBs and PEBs reach accurate and consistent disability decisions. The Department recognizes quality assurance is an ongoing process, and is a crucial component within the disability evaluation process in achieving more accurate and consistent decisions and outcomes. DoD's DES QAP will further enhance procedural equity by establishing additional safeguards to influence accurate and consistent decisions, and should provide assurance to Service members that they will receive consistent and equitable decisions throughout the DES process. Ultimately, more accurate and consistent decisions throughout the disability evaluation processes should result in a better overall disability evaluation experience for Service members. Once fully operational, the Department's DES QAP will provide a standardized, comprehensive, and multidimensional process improvement framework for the Military Departments.

BIBLIOGRAPHY

- Chassman, D.A. and Rolston, H. *Social Security Disability Hearings: A Case Study in Quality Assurance and Due Process*, HeinOnline, 65 Cornell Law Review 801-1979-80.
- Under Secretary of Defense (Personnel and Readiness), *Charter: Department of Defense Advisory Council (DAC) Disability Evaluation System (DES)*, October 2013.
- Under Secretary of Defense (Personnel & Readiness), *Department of the Defense Instruction 1332.38 - Physical Disability Evaluation*, July 10, 2006.
- Under Secretary of Defense (Personnel & Readiness), *Department of the Defense Instruction 6040.44 - Lead DoD Component for the Physical Disability Board of Review (PDBR)*, June 27, 2008.
- U.S. Congress (112th), National Defense Authorization Act (NDAA) Fiscal Year 2013, H.R. 4310, *Section 524, Quality Review of Medical Evaluation Boards, Physical Evaluation Boards, and Physical Evaluation Board Liaison Officers*, January 2, 2013.
- U.S. Department of the Air Force, *Patient Administration Functions*, Air Force Instruction 41-210, March 22, 2006.
- U.S. Department of the Army, *Physical Evaluation for Retention, Retirement, or Separation*, Army Regulation 635-40, February 8, 2006.
- U.S. Department of the Army, *Patient Administration*, Army Regulation 40-400, October 13, 2006.
- U.S. Department of Defense, Office of Warrior Care Policy, *Recovery Coordination Program Portfolio Update Brief*, June 20, 2012.
- U.S. Department of the Navy, *Manual of the Medical Department, Change 120, NAVMED P-117*, January 10, 2005.
- U.S. Department of Navy, *Disability Evaluation Manual*, SECNAV Instruction 1850.4E, April 30, 2002.
- U.S. Department of Veterans Affairs Office of Inspector General, *"Audit of Veterans Benefits Administration Compensation Rating Accuracy and Consistency Reviews,"* Report No. 08-02073-96, March 12, 2009.
- U.S. Government Accountability Office, *Military and Veterans Disability System: Pilot Has Achieved Some Goals, but Further Planning and Monitoring Needed*, GAO-11-69 (Washington, D.C.: Dec. 6, 2010).
- U.S. Government Accountability Office, *Military Disability System: Improved Monitoring Needed to Better Track and Manage Performance*, GAO-12-676 (Washington, D.C.: August 2012).

U.S. Government Accountability Office, *Veterans Disability Benefits: VA Has Improved Its Programs for Measuring Accuracy and Consistency, but Challenges Remain*, GAO-10-530T (Washington, D.C.: March 24, 2010).

U.S. Government Accountability Office, *Military Disability System: Improved Oversight Needed to Ensure Consistent and Timely Outcomes for Reserve and Active Duty Service Members*, GAO-06-362 (Washington, D.C.: March 2006).

U.S. Government Accountability Office, *Military and Veterans Disability System: Increased Supports for Service Members and Better Pilot Planning Could Improve the Disability Evaluation Process*, GAO-08-1137 (Washington, D.C.: September 2008)

U.S. Social Security Administration, Program Operating Manual System. Retrieved April 3, 2013 from: <http://policy.ssa.gov/poms.nsf/lnx/0480830076>

APPENDIX 1: NOTIONAL ACCURACY SAMPLE SIZE NUMBERS BY REGION

Table 1: IOC – Illustrative Notional Caseloads Stratified by Military Department Region

Confidence Level: 90%							
Margin of Error: +/- 10							
MEB & PEB	Total # Cases	# Regions	Region	Sample # Cases/Region/Year	Sample # Cases/Region/Month	Total Sample # Cases/Year	Total Sample # Cases/Month
Army	11110	3	WRMC	65	5	199	17
			SRMC	66	6		
			NRMC	67	6		
DoN	5624	3	W	66	6	181	15
			NCA	49	4		
			E	66	6		
AF	2825	3	Ov	53	4	181	15
			Op	65	6		
			FS	63	5		

Key:

- Army (Department of the Army)
 - WRMC- Western Region Medical Command
 - SRMC- Southern Region Medical Command
 - NRMC- Northern Region Medical Command
- DoN (Department of the Navy)
 - W- West
 - NCA- National Capital Area
 - E- East
- AF (Department of the Air Force)
 - Ov- Overseas Major Air Command
 - Op- Operational Major Air Command
 - FS- Force Support Major Air Command