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STATEMENT OF

CHRISTINA M. ROOF

AMVETS NATIONAL ACTING LEGISLATIVE DIRECTOR

BEFORE THE

**SUBCOMMITTEE ON DISABILITY ASSISTANCE AND
MEMORIAL AFFAIRS**

CONCERNING

**THE PRESIDENT'S FISCAL YEAR 2012 BUDGET FOR THE
VETERANS BENEFIT ADMINISTRATION, NATIONAL
CEMETERY ADMINISTRATION, BATTLE MONUMENTS
COMMISSION AND COURT OF APPEALS FOR VETERANS
CLAIMS**

THURSDAY MARCH 17, 2011

334 CANNON HOUSE OFFICE BUILDING

1:00 PM

Chairman Runyan, Ranking Member McNerney and distinguished members of the subcommittee, on behalf of AMVETS, I would like to extend our gratitude for being given the opportunity to share with you our views and recommendations regarding the President's budget request for Fiscal Year 2012 for the Department of Veterans Affairs National Cemetery Administration and ways to improve accountability and efficiency regarding Compensation and Pension.

AMVETS feels privileged in having been a leader, since 1944, in helping to preserve the freedoms secured by America's Armed Forces. Today our organization prides itself on continuing this tradition, as well as our undaunted dedication to ensuring that every past and present member of the Armed Forces receives all of their due entitlements. These individuals, who have devoted their entire lives to upholding our values and freedoms, deserve nothing less.

By way of background, the stated mission of The National Cemetery Administration (NCA) is to honor veterans with final resting places in national shrines and with lasting tributes that commemorate their service to our nation. Their vision is to serve all veterans and their families with the utmost dignity, respect, and compassion and ensure that every national cemetery will be a place that inspires visitors to understand and appreciate the service and sacrifice of our nation's veterans. Furthermore, many states have established state veterans cemeteries. Eligibility is similar to that of the Department of Veterans Affairs (VA) national cemeteries, but may include residency requirements. Even though they may have been established or improved with government funds through VA's State Cemetery Grants Program, state veterans cemeteries are run solely by the states.

As of late 2010 the Department of Veterans Affairs National Cemetery Administration (NCA) maintained more than 3 million graves at 131 national cemeteries in 39 states and Puerto Rico. Of these cemeteries, 71 are open to all interment; 19 will accept only cremated remains and family members of those already interred; and 41 will only perform interments of family members in the same gravesite as a previously deceased family member.¹

VA estimates nearly 23 million veterans are living today. They include veterans from World Wars I and II, the Korean War, the Vietnam War, the Gulf War, the conflicts in Afghanistan and Iraq, the Global War on Terrorism, as well as peacetime veterans. With the anticipated opening of the newly planned national cemeteries, annual interments are projected to increase to approximately 116,000 in 2013, and are projected to maintain that level through 2015. Historically, only 12 percent of veterans opt for burial in a state or national cemetery, although these numbers are steadily rising.

The most important obligation of the NCA is to honor the memory of America's brave men and women who served in the armed forces. Therefore, the purpose of these cemeteries as national shrines is one of NCA's top priorities. Many of the individual cemeteries within the system are steeped in history and the monuments, markers, grounds and related memorial tributes represent the very foundation of the United States. With this understanding, the grounds, including monuments and individual sites of interment, represent a national treasure that must be protected, respected and cherished.

Furthermore, AMVETS would like to acknowledge the dedication and commitment of the NCA staff who continue to provide the highest quality of service to veterans and their families. We call on the Administration and Congress to provide the resources needed to meet the changing and critical nature of NCA's mission and fulfill the nation's commitment to all veterans who have served their country honorably and faithfully.

In FY 2010, \$250 million was appropriated for the operations and maintenance of NCA, with approximately \$2 million in carryover. This constitutes less than one percent of the total Operations and Maintenance budget. NCA awarded 47 of its 50 planned minor construction projects, and the three unobligated projects will be obligated in FY 2011. The States Cemetery Grants Program awarded \$48.5 million to fund 12 state cemeteries.

The NCA has done an exceptional job of providing burial options for 90.5 percent of veterans who are part of the 170,000 veterans within a 75-mile radius threshold model. The NCA realized that, without adjusting this model, only one area, St. Louis, would qualify for a cemetery within the next five years and that the five highest veteran population centers would never qualify.

AMVETS is pleased, as were the 2011 Independent Budget (IB) authoring organizations, to see that the NCA has adjusted its model and will begin using the model of 80,000 veterans within a 75-mile radius for future cemetery placement. This modification will allow the NCA to continue to provide burial options for veterans who would otherwise be limited geographically for this benefit.

As the author of the NCA section of the 2011 IB, we recommended an operations budget of \$275 million for NCA for FY 2012 so it can meet the increasing demands of interments, gravesite maintenance and related essential elements of cemetery operations.

This funding level will allow NCA to perform their five primary missions:

- (1) To inter, upon request, the remains of eligible veterans and family members and to permanently maintain gravesites.
- (2) To mark graves of eligible persons in national, state, or private cemeteries upon appropriate application.

- (3) To administer the state grant program in the establishment, expansion, or improvement of state veterans cemeteries.
- (4) To award a presidential certificate and furnish a United States flag to deceased veterans.
- (5) To maintain national cemeteries as national shrines sacred to the honor and memory of those interred or memorialized.

However, NCA still continues to face serious challenges. Though there has been significant progress made over recent years, NCA is still struggling to remove decades of blemishes and scars from military burial grounds across the country. Visitors to national cemeteries are still likely to encounter sunken graves, misaligned and dirty grave markers, deteriorating roads, spotty turf and other patches of decay that have been accumulating for decades. If NCA is to continue its commitment to ensure national cemeteries remain dignified and respectful settings that honor deceased veterans and give evidence of the nation's gratitude for their military service, there must be a comprehensive effort to greatly improve the condition, function, and appearance of all our national cemeteries.

Furthermore, to correct these problems NCA has worked tirelessly to improve the appearance of our national cemeteries, investing \$45 million in the National Shrine Initiative in FY 2010 and approximately \$25 million per year for the three previous years. NCA has done an outstanding job thus far in improving the appearance of our national cemeteries, but we have a long way to go to get us where we need to be. In 2006 only 67 percent of headstones and markers in national cemeteries were at the proper height and alignment. By 2009 proper height and alignment increased to 76 percent. NCA is on target to reach 82 percent this fiscal year. However, AMVETS believes all of our national cemeteries should be nothing less than perfect to properly memorialize the brave men and women who have served, and in many cases died for, this great nation. This is why AMVETS made the recommendation in the FY 2012 IB for NCA's operations and maintenance budget be increased by \$20 million per year until the operational standards and measures goals are reached and all of these sacred grounds are properly maintained.

In addition to the management of national cemeteries, NCA is responsible for the Memorial Program Service. The Memorial Program Service provides lasting memorials for the graves of eligible veterans and honors their service through Presidential Memorial Certificates. Public Laws 107-103 and 107-330 allow for a headstone or marker for the graves of veterans buried in private cemeteries who died on or after September 11, 2001. Prior to this change, NCA could provide this service only to those buried in national or state cemeteries or to unmarked graves in private cemeteries. Public Law 110-157 gives VA authority to provide a medallion to be attached to the headstone or marker of veterans who are buried in a private cemetery. This benefit is available to veterans in lieu of a government-furnished headstone or marker.

Another critical part of NCA's mission is The State Cemeteries Grant Program (SCGP). SCGP complements NCA's mission to establish gravesites for veterans in areas where it cannot fully respond to the burial needs of veterans. Several incentives are in place to assist states in this effort. For example, NCA can provide up to 100 percent of the development cost for an approved cemetery project, including design, construction, and administration. In addition, new equipment, such as mowers and backhoes, can be provided for new cemeteries.

Since implemented in 1978, VA has more than doubled the available acreage and accommodated more than a 100-percent increase in burial through the SCGP. With the enactment of the Veterans Benefits Improvements Act of 1998, the NCA has been able to strengthen its partnership with states and increase burial service to veterans, especially those living in less densely populated areas not currently served by a national cemetery. Currently there are 48 state and tribal government matching grants for cemetery projects.

The SCGP currently is facing the challenge of meeting a growing interest and need from states to provide burial services in areas that are not currently served. Due to this overwhelming need for SCGP services AMVETS and our fellow IB partners recommend an operating budget of \$51 for FY 2012 for SCGP. This funding level would allow SCGP to establish new state cemeteries at their current rate that will provide burial options for veterans who live in regions that currently has no reasonably accessible state or national cemeteries. AMVETS believes it is crucial to maintain and establish our state cemeteries, so that veterans who may otherwise not have access to a national cemetery still have the earned option of being buried with their fellow brothers and sisters at arms.

Finally, another part of NCA's responsibilities is burial benefits. Burial allowance was first introduced in 1917 to prevent veterans from being buried in potter's fields. In 1923 the allowance was modified. The benefit was determined by a means test, and then in 1936 the means test was removed. In its early history the burial allowance was paid to all veterans, regardless of their service connectivity of death. In 1973 the allowance was modified to reflect the status of service connection. The plot allowance was introduced in 1973 as an attempt to provide a plot benefit for veterans who did not have reasonable access to a national cemetery.

In 1973, NCA established a burial allowance that provided partial reimbursements for eligible funeral and burial costs. The current payments are:

- \$2,000 for burial expenses for service-connected (SC) death,
- \$300 for non-service-connected (NSC) deaths, and
- \$300 for plot allowance.

At its inception, the payout covered 72 percent of the funeral cost for a service-connected (SC) death, 22 percent for a non-service-connected death, and 54 percent of the burial plot cost. However, by 2007 these benefits eroded from 72 percent to 23 percent, from 22 percent to 4 percent and from 54 percent to 14 percent respectively. AMVETS strongly believes it is time to restore the original value of the benefit.

And while AMVETS is pleased that the 111th Congress acted to improve the benefits, raising the plot allowance to \$700 as of October 1, 2011, we still believe that there are serious deficits in original value of the benefit when compared to the current value. While the cost of a funeral has increased by nearly 700 percent, the burial benefit has only increased by 250 percent.

To restore both the burial allowance and plot allowance back to their 1973 values AMVETS recommends:

- SC benefit payment should be \$6,160,
- NSC benefit value payment should be \$1,918, and
- Plot allowance should increase to \$1,150.

Based on accessibility and the need to provide quality burial benefits, AMVETS and our IB partners recommend the following:

1. VA should separate burial benefits into two categories: Veterans who live inside the VA accessibility threshold model and those who live outside the threshold.
2. For veterans who live outside the threshold, the SC burial benefit should be increased to \$6,160, NSC veteran's burial benefit should be increased to \$1,918, and plot allowance should increase to \$1,150 to match the original value of the benefit.
3. For veterans who live within reasonable accessibility to a state or national cemetery that is able to accommodate burial needs, but the veteran would rather be buried in a private cemetery, the burial benefit should be adjusted. These veterans' burial benefits will be based on the average cost for VA to conduct a funeral.
4. The benefit for a SC burial should be \$2,793, the amount provided for a NSC burial should be \$854, and the plot allowance should be \$1,150. This will provide a burial benefit at equal percentages, but based on the average cost for a VA funeral and not on the private funeral cost that will be provided for those veterans who do not have access to a state or national cemetery.

5. In addition to the recommendations we have mentioned, AMVETS also believes that Congress should enact legislation to adjust burial benefits to accurately reflect inflation annually.

AMVETS calls upon the Administration and Congress to provide the resources required to meet the critical nature of the NCA mission and fulfill the nation's commitment to all veterans who have served their country so honorably and faithfully.

NCA honors veterans with a final resting place that commemorates their service to this nation. More than three million service members who died in every war and conflict are honored through internment in a VA national cemetery. Each Memorial Day and Veterans Day we honor the last full measure of devotion they gave for this country. Our national cemeteries are more than the final resting place of honor for our veterans; they are hallowed ground to those who died in our defense and a memorial to those who survived.

By way of background, VA has two programs for disability compensation and disability pension (C&P). Disability compensation is a benefit paid to a veteran because of injuries or diseases that happened while on active duty, or were made worse by active military service. It is also paid to certain veterans disabled from VA health care. The benefits are tax-free.² Eligibility for disability compensation is based on an honorable discharge and a service-connected disability. The benefits paid are based on the severity of a veteran's disability and their percentage rating. In addition a veteran may be eligible for additional amounts if they you have very severe disabilities or loss of limb(s), have a spouse, child(ren), or dependent parent(s) or have a seriously disabled spouse.³

AMVETS believes the current C&P formulas used to define eligibility need to be simplified and reflect the true needs of disabled veterans, survivors and their families. We also believe the pension benefits need to more accurately reflect a veteran's financial needs.

The following charts illustrate the current rate of disability compensation:

10% - 20% (No Dependents)

Percentage	Rate
10%	\$123
20%	\$243

30% - 60% Without Children

Dependent Status	30%	40%	50%	60%
Veteran Alone	\$376	\$541	\$770	\$974
Veteran with Spouse Only	\$421	\$601	\$845	\$1064
Veteran with Spouse & One Parent	\$457	\$649	\$905	\$1136
Veteran with Spouse and Two Parents	\$493	\$697	\$965	\$1208
Veteran with One Parent	\$412	\$589	\$830	\$1046
Veteran with Two Parents	\$448	\$637	\$890	\$1118
Additional for A/A spouse (see footnote b)	\$40	\$54	\$68	\$81

70% - 100% Without Children

Dependent Status	70%	80%	90%	100%
Veteran Alone	\$1,228	\$1,427	\$1,604	\$2,673
Veteran with Spouse Only	\$1,333	\$1,547	\$1,739	\$2,823
Veteran with Spouse & One Parent	\$1,417	\$1,643	\$1,847	\$2,943
Veteran with Spouse and Two Parents	\$1,501	\$1,739	\$1,955	\$3,063
Veteran with One Parent	\$1,312	\$1,523	\$1,712	\$2,793
Veteran with Two Parents	\$1,396	\$1,619	\$1,820	\$2,913
Additional for A/A spouse (see footnote b)	\$95	\$108	\$122	\$136

30% - 60% With Children

Dependent Status	30%	40%	50%	60%
Veteran with Spouse & Child	\$453	\$644	\$899	\$1129
Veteran with Child Only	\$406	\$581	\$820	\$1034
Veteran with Spouse, One Parent and Child	\$489	\$692	\$959	\$1201
Veteran with Spouse, Two Parents and Child	\$525	\$740	\$1019	\$1,273
Veteran with One Parent and Child	\$442	\$629	\$880	\$1106
Veteran with Two Parents and Child	\$478	\$677	\$940	\$1178
Add for Each Additional Child Under Age 18	\$22	\$30	\$37	\$45
Each Additional Schoolchild Over Age 18 (see footnote a)	\$72	\$96	\$120	\$144
Additional for A/A spouse (see footnote b)	\$40	\$54	\$68	\$81

70% - 100% With Children

Dependent Status	70%	80%	90%	100%
Veteran with Spouse & Child	\$1,409	\$1,634	\$1,837	\$2,932
Veteran with Child Only	\$1,298	\$1,507	\$1,694	\$2,774
Veteran with Spouse, One Parent and Child	\$1,493	\$1,730	\$1,945	\$3,052
Veteran with Spouse, Two Parents and Child	\$1,577	\$1,826	\$2,053	\$3,172
Veteran with One Parent and Child	\$1,382	\$1,603	\$1,802	\$2,894
Veteran with Two Parents and Child	\$1,466	\$1,699	\$1,910	\$3,014
Add for Each Additional Child Under Age 18	\$52	\$60	\$67	\$75
Each Additional Schoolchild Over Age 18 (see footnote a)	\$168	\$192	\$216	\$240
Additional for A/A spouse (see footnote b)	\$95	\$108	\$122	\$136

FOOTNOTES:

- a. Rates for each school child are shown separately. They are not included with any other compensation rates. All other entries on this chart reflecting a rate for children show the rate payable for children under 18 or helpless. To find the amount payable to a 70% disabled veteran with a spouse and four children, one of whom is over 18 and attending school, take the 70% rate for a veteran with a spouse and 3 children, \$ 1,513, and add the rate for one school child, \$168. The total amount payable is \$1,681.
- b. Where the veteran has a spouse who is determined to require A/A, add the figure shown as "additional for A/A spouse" to the amount shown for the proper dependency code. For example, veteran has A/A spouse and 2 minor children and is 70% disabled. Add \$95, additional for A/A spouse, to the rate for a 70% veteran with dependency code 12, \$1,461. The total amount payable is \$ 1,556.

Pension benefits are meant as assistance for eligible veterans, surviving spouses and children who demonstrate financial need. Pension is a benefit paid to wartime veterans who have limited or no income and who are age 65 or older, or, if under 65, who are permanently and totally disabled. Veterans who are more seriously disabled may qualify for Aid and Attendance or Housebound benefits. These are benefits that are paid in addition to the basic pension rate.⁴ Eligibility for VA pension is usually contingent upon a veteran being honorably discharged from the military, has served at least 90 days of active military service 1 day of which was during a war time period. If you entered active duty after September 7, 1980, generally you must have served at least 24 months or the full period for which called or ordered to active duty (there are exceptions to this rule), and your countable family income is below a yearly limit set by law and finally, you are age 65 or older, or, you are permanently and totally disabled, not due to your own willful misconduct.⁵ In other words, pension is usually based on a veterans need and net worth.

In 2007 the Institute of Medicine (IOM) Committee on Medical Evaluation of Veterans for Disability Compensation published a report, “A 21st Century System for Evaluating Veterans for Disability Benefits,” recommending that the current VA disability compensation system be expanded to include compensation for non-work disability and loss of quality of life.⁶ The report touches upon several systems that could be used to measure and compensate for loss of quality of life, including the World Health Organization–devised International Classification of Functioning, Disability, and Health, the Canadian Veterans’ Affairs disability compensation program, and the Australian Department of Veterans’ Affairs disability compensation program. The report went on to distinguish between the purpose of disability benefits and the operational basis for those benefits. Under the current VA disability compensation system, the purpose of the compensation is to make up for average loss of earning capacity, whereas the operational basis of the compensation is usually based on medical impairment. Neither of these models generally appears to incorporate noneconomic loss or quality of life into the final disability ratings, though special monthly compensation (SMC) does in some limited cases.⁷

The IOM report stated:

In practice, Congress and VA have implicitly recognized consequences in addition to work disability of impairments suffered by veterans in the Rating Schedule and other ways. Modern concepts of disability include work disability, non-work disability, and quality of life (QOL)... [and that] “This is an unduly restrictive rationale for the program and is inconsistent with current models of disability.”⁸

The congressionally-mandated Veterans Disability Benefits Commission (VDBC), established by the National Defense Authorization Act of 2004 (P.L. 108-136), spent more than two years examining how the rating schedule might be modernized and updated.

Reflecting the recommendations of a comprehensive study of the disability rating system by the

IOM, the VDBC in its final report issued in 2007 recommended:

The veterans disability compensation program should compensate for three consequences of service-connected injuries and diseases: work disability, loss of ability to engage in usual life activities other than work, and loss of quality of life.⁹

The IOM report, the VDBC (and an associated Center for Naval Analysis study), and the Dole-Shalala Commission (President's Commission on Care for America's Returning Wounded Warriors) all agreed that the current benefits system should be reformed to include noneconomic loss and quality of life as a factor in compensation. Once this principle is established in statute, only then shall Congress and VA be able to fully and accurately address the question of whether such compensation should be provided through immediate changes to the rating schedule that would modify or include additional compensation paid for average loss of earnings capacity or whether it should come from a separate compensation program, such as SMC.¹⁰

AMVETS and the other IB authoring VSOs recommend Congress amend Title 38 to clarify disability compensation, in addition to providing compensation to service-connected disabled veterans for their average loss of earnings capacity, must also include compensation for their noneconomic loss and for loss of their quality of life.

AMVETS believes there also must be an immediate change to the level of oversight given to the C&P medical exams program. AMVETS believes that the overall lack of timely and complete exams by trained medical professionals is significantly adding unnecessary burdens and extensive waiting periods for veterans seeking these benefits.

In 2008 GAO published their findings on VA's C&P programs. They found over 500,000 VA pensioners had non-pension incomes well below the federal poverty level, were beyond retirement age, and had multiple impairments, and the population has been decreasing in number. The average annual reported income of these pensioners, excluding their VA pensions, was less than \$5,000. GAO went on to state, "VA policies and procedures are not sufficient to ensure sound decisions on new pension claims."

AMVETS is aware of the recent changes to the C&P programs but still believes they are falling short of where they should be. AMVETS believes the current processes in place at VA to assess whether pensioners continue to receive the proper benefits have significant limitations and are outdated. Although the agency requires pensioners to report changes that might affect their pensions, VA does not require documentation such as bank or asset statements when pensioners report financial changes.

AMVETS believes there are still several policies and procedures that need to be developed and implemented in order to improve the services and benefits our veteran community receives. For example, AMVETS believes the rating process quality must be improved to prevent unnecessary appeals. AMVETS also believes better and more frequent training of staff will improve the chances of a claim being evaluated correctly the first time. Periodic testing to identify deficiencies will help ensure a successful program, as well as helping to identify best practices.

AMVETS also believes there needs to be a re-evaluation of the work credit system. AMVETS strongly believes there needs to be immediate corrections of weaknesses within the VA C&P system, so that veterans will receive timely and accurate ratings and benefits.

Chairman Runyan and distinguished members of the subcommittee, this concludes my testimony and I stand ready to address any questions you may have for me.



Christina M. Roof serves as the National Acting Legislative Director for the national veterans service organization American Veterans (AMVETS) at the organization's national headquarters.

As one of AMVETS' top advocates on Capitol Hill, Ms. Roof is responsible for researching, writing, and presenting testimony to the U.S. House of Representatives on behalf of AMVETS. Ms. Roof is also involved with the development and execution of AMVETS' legislative agenda in the areas of veterans entrepreneurship, appropriations, health care, veteran benefits, active duty service member entitlements, and national security, among many other subject matter areas.

Ms. Roof also represents AMVETS to numerous federal agencies including, but not limited to, the Department of Veterans Affairs, Department of Defense, Department of Labor, and the Department of Homeland Security. Ms. Roof is also an author and contributor to the Department of Veterans Affairs Independent Budget, which is published annually by the nation's top veterans' service organizations AMVETS, Disabled American Veterans, Paralyzed Veterans of America, and Veterans of Foreign Wars. Ms. Roof's responsibilities also include actively identifying current issues and concerns within the veterans and active duty military communities, and helping to develop and execute plans, both legislatively and through outreach, to promote and institute solutions.

Ms. Roof hails from a family steeped in military tradition and brings a wealth of personal knowledge on veterans' and military issues to AMVETS. She is an active member and committee member in several service and volunteer organizations, including AMVETS Ladies Auxiliary, The Military Coalition, and the Department of Labor's Veteran Entrepreneurship Advisory Committee.

Ms. Roof joined the AMVETS staff after working as a small business and public relations consultant for several years. Ms. Roof holds a Bachelor of Arts degree in Military History and Strategy from the College of Charleston in Charleston, South Carolina, as well as many professional and academic certifications.

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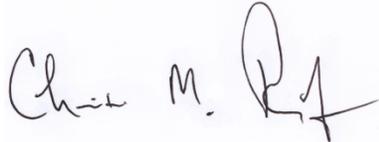
March 10, 2011

The Honorable Representative Runyan, Chairman
Subcommittee on Disability Assistance and Memorial Affairs
House Veterans Affairs Committee
335 Cannon House Office Building
Washington, D.C. 20510

Dear Chairman Runyan:

Neither AMVETS nor I have received any federal grants or contracts, during this year or in the last two years, from any agency or program relevant to the March 17, 2011, Subcommittee on Disability Assistance and Memorial Affairs hearing on the President's Fiscal Year 2012 Budget for The Veterans Benefit Administration, National Cemetery Administration, Battle Monuments Commission and Court Of Appeals For Veterans Claims.

Sincerely,

A handwritten signature in black ink that reads "Christina M. Roof". The signature is written in a cursive, slightly slanted style.

Christina M. Roof
National Acting Legislative Director

¹ <http://www.cem.va.gov/cem/cems/listcem.asp>

² <http://www.vba.va.gov/bln/21/compensation/index.htm>

³ <http://www.vba.va.gov/bln/21/compensation/index.htm>

⁴ <http://www.vba.va.gov/bln/21/pension/vetpen.htm>

⁵ <http://www.vba.va.gov/bln/21/pension/vetpen.htm>

⁶ Committee on Medical Evaluation of Veterans for Disability Compensation, Institute of Medicine of the National Academies, *A 21st Century System for Evaluating Veterans for Disability Benefits* (2007) [hereinafter IOM Report].

⁷ *Ibid.*, 117–18.

⁸ *Ibid.*, 3.

⁹ Veterans' Disability Benefits Commission, *Honoring The Call To Duty: Veterans' Disability Benefits in the 21st Century* (2007), 76.

¹⁰ FY 2012 *The Independent Budget, Benefits Programs*