



Executive Summary

Guam Office of Veterans Affairs Administrative Services

OPA Report No. 25-11, October 2025

Our audit of the Guam Office of Veterans Affairs' (GOVA) Administrative Services found that the lack of adequate budgetary resources continues to limit GOVA's ability to efficiently and timely meet its mandates and creates a high risk for breaches in security and loss of physical records. Specifically, our audit found:

1. Insufficient staffing to process Veterans Affairs¹ (VA) Claims, maintain the Guam Veterans Registry (Registry), and Cemetery Operations;
2. Inadequate Office Space; and
3. Deficiencies in data management and information security.

Insufficient Staffing to process VA Claims, maintain the Registry, and Cemetery Operations

There are significant staffing shortages within GOVA's Administrative Division, which operates with only nine employees, serving approximately 24,000 active claimants², as of Fiscal Year (FY) 2025. Of the nine employees, five are VA-accredited Veteran Service Organization Representatives (VSR), who assist claimants with applying for VA benefits and services. GOVA management could not provide the total number of claimants assisted per year, because there is no tracking mechanism in place for this information. We estimate that with its current staffing, each GOVA VSR would potentially assist up to 4,800 claimants annually (24,000 claimants/five VSRs). Although GOVA implemented procedures to streamline meeting times, claimants can still expect to wait at least one month before meeting with a VSR.

GOVA does not have the staffing capacity to plan or conduct GOVA-sponsored outreach activities regarding VA claims. This, coupled with the lengthy waiting period for a meeting with a VSR, has led to a growing reliance on the assistance of community-based and non-profit organizations to fill in the gaps in GOVA's services.

Based on our observations and citizen concerns, there may be an increased risk for fraud and abuse when claimants choose to go to community-based and non-profit organizations that do not have qualified attorneys, agents, or representatives of VSOs (Veterans Service Organizations) who are not accredited by the VA. VA accreditation ensures that advisors possess the necessary education, training, or experience to guide veterans through the disability claims process and to act ethically. The accreditation system also holds advisors accountable when they violate VA regulations or federal law. If a claimant chooses to seek assistance from an individual who is not accredited by

¹ United States Department of Veterans Affairs

² All eligible Guam veterans, spouses, dependents, legal guardians, and parents who are entitled to seek claims assistance from GOVA for state or VA benefits and services, as defined by local and federal law or regulation.

the VA, the individual cannot represent the claimant and may only provide guidance on how claimants can handle their own claims.

Although GOVA has no formal monitoring and reporting procedures, they noted that they have received reports of concerns from veterans who were assisted by community volunteers that led to issues with their claims—some to the extent where claimants were notified and instructed by the VA to repay funds as a result of errors in improperly filled out forms that volunteers submitted on behalf of claimants. If a claimant receives assistance from these organizations and there are issues with the claim, GOVA will not intervene in an active claim without the adjudication of VA Form 21-22, appointing GOVA as the claimant's authorized representative. Regardless of how claims are filed with the VA, GOVA receives and maintains files of all courtesy correspondence received from the VA of all Guam veterans and families who have made contact with the VA.

In addition to processing VA claims, GOVA is responsible for the establishment and maintenance of the Registry which shall be updated no less than semiannually. Only 2,196 individuals have been added to the Registry since 2017, and GOVA did not identify a procedure or process for reconciling the Registry with the active files maintained by GOVA. As a result of the disparity between the number of registered individuals and the number of active files, community volunteers and organizations have urged the need to generate their own registries. Although GOVA is the only entity authorized to update the official Registry for governmental use, these volunteer efforts have caused confusion among veterans who have already registered with GOVA or those who do not know which entity to register with.

Despite these deficiencies and the overwhelming demand for assistance, funding for recruitment was neither requested nor appropriated until June 2024 with the passage of Public Law 37-102. Prior to the current fiscal year, the most recent recruitment of additional VSR positions occurred between FY 2020 and 2021. As of July 2025, GOVA Management reported that efforts are underway to recruit eight new employees to fill two recently-vacated VSR positions and six new VSR positions. However, recruitment may take up to six months to complete.

Staffing challenges extend to cemetery operations, where the current staffing pattern for the Cemetery lists five employees who are all on Limited Term Appointment status. These positions include a Program Coordinator I, two Laborers, a Grounds Worker, and an Equipment Operator IV. Recruitment is in progress for six Cemetery Workers, but the number of interested applicants for this position remains low—possibly due to the qualification requirement for applicants to possess a chauffeur's license. As of August 2025, the Governor of Guam approved the request for an adjustment to this qualification so that a chauffeur's license *may* be required.

As a result of the lack of manpower at the Cemetery, there are 19 head markers that have yet to be installed. Management is in discussion with leadership in other GovGuam departments to engage in partnerships to assist GOVA with Cemetery operations, but there is no firm commitment on record at this time.

Inadequate Office Space

While GOVA has requested for additional personnel to address staffing deficiencies, its current office space cannot accommodate additional employees, and they have also outgrown its storage

capacity for physical records. In addition, GOVA Management pointed out that the current administrative office is not compliant with the Americans with Disabilities Act (ADA). GOVA Management is in ongoing discussion with the Office of the Governor about moving to a larger office space, but there has been no movement on the issue.

Deficiencies in Data Management and Information Security

Despite statutory mandates requiring secure handling of veterans' data, GOVA lacks a centralized, secure digital records system, putting over 24,000 active claimant files at risk. Documents are copied, scanned, and temporarily stored on unencrypted thumb drives which are placed in unlocked desks. There is no dedicated storage unit or written policy for data security. File folders are tracked manually and stored in overfilled cabinets, and additional records are kept in Bankers Boxes on the floor, increasing vulnerability to water damage, pests, and fire. While digitization efforts are underway, progress remains incomplete.

GOVA's plan to procure a Veterans Information Management System (VIMS), which can address significant weaknesses in GOVA's data management and information security practices, remains unfunded. Although GOVA's budget proposals for fiscal years 2024 and 2025 included \$21,000 for a VIMS, this amount falls significantly short of the estimated \$500,000 required to implement the full system with a centralized digital records system.

Additionally, the continued reliance on manual tracking and unsecured physical storage is due to insufficient investment in their file storage management. Between FY 2018 and FY 2025, the average appropriation for GOVA operations is \$826 thousand (K). GOVA budget proposals show an average of \$718K is budgeted for personnel services, and an average of \$158K is budgeted for operations, utilities, and capital outlay.

Other Matters

During the course of our audit, legislation was introduced to amend 5 GCA § 67100, proposing that the position of the Veterans Affairs Officer (VAO) be appointed with advice of the Commission, as a member of the unclassified service. The current statute mandates that the VAO would be appointed as a member of the classified service to GovGuam. To date, this position has never been filled, and records show only the appointment of individuals who served as the GOVA Director in the unclassified service, serving at the pleasure of the appointing governors. A complete analysis may be needed to fully determine what would be ideal to stakeholders.

Conclusions and Recommendations

Although GOVA has recently adopted internal policies and procedures to improve effectiveness in meeting its mandates, limited budgetary resources continue to impact GOVA's capacity to efficiently and timely meet these mandates. In addition, the lack of funding for information security and proper records management creates a high risk for security breaches, unauthorized access to sensitive and confidential information, and physical damage or loss of records.

To address these deficiencies, we recommend the following:

1. GOVA Management should assess its proposed budget plan and other funding sources to pay for:

- a) office space that is secure and large enough to accommodate additional staff and is ADA-compliant.
 - b) software (i.e., VIMS) and hardware (i.e., computers, backup power sources, etc.);
 - c) server technology dedicated to the storage of all claimant data, eliminating the need to store paper documents or the use of portable thumb drives; and
 - d) professional services for either archival production to digitize all paper documents or records storage and management services.
2. GOVA Management should collaborate with all local VSOs to identify prospective VSRs for the purpose of providing greater access to all claimants on Guam who apply for benefits and services with the VA.
 3. GOVA should evaluate its public information and outreach procedures to educate all eligible veterans and their family members about the Registry, how and where to register, and the value of being a registered veteran.
 4. GOVA should adopt and implement SOPs for strict adherence to confidentiality, protection from unauthorized disclosure of information, and annual security awareness training to mitigate information security risks.
 5. GOVA should pursue the adoption of Rules and Regulations for the confidentiality of the Registry, as required by law (10 GCA § 67110(b)(3)).

The GOVA Director concurred with our recommendations and provided a proposed corrective action plan. We commend GOVA for preparing the plan as it reflects GOVA's commitment to addressing the issues identified in the audit report.



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