

# Congress of the United States

Washington, DC 20510

March 28, 2025

The Honorable Doug Collins  
Secretary  
U.S. Department of Veterans Affairs  
810 Vermont Avenue, NW  
Washington, DC 20420

Dear Secretary Collins,

We write to follow up on the recent news regarding the accelerated fielding plan for the Department of Veterans Affairs' (VA) Electronic Health Record Modernization (EHRM) program and request an updated schedule and cost estimate for EHRM by September 30, 2025, before fielding resumes.

VA is legally and administratively required to provide a cost estimate for EHRM due to a framework of federal laws and Office of Management and Budget (OMB) directives governing major acquisition programs. The Clinger-Cohen Act of 1996 (P.L. 104-106) requires that executive agencies, including VA, adhere to OMB processes to evaluate the risks and results of all major capital investments for information systems, to include the projected and actual costs, benefits, and risks associated with the investments. OMB Circular A-11 explicitly requires life cycle cost estimates for major systems like EHRM to support planning, budgeting, oversight, and transparency. Additional OMB directives, such as Circular A-130 and Memorandum M-15-14 under the Federal Information Technology Acquisition Reform Act (P.L. 113-291), reinforce that major IT programs must have validated cost estimates to secure budget approval and Chief Information Officer oversight. The Federal Acquisition Regulation operationalizes these mandates by requiring cost analysis for acquisition planning. These requirements ensure that the VA can manage taxpayer funds responsibly and that EHRM is aligned with its mission to improve veteran health care.

The Government Accountability Office (GAO) has repeatedly recommended that VA develop and update cost estimates for EHRM before proceeding further, highlighting deficiencies in the Department's financial planning related to this program. In a March 2025 GAO report entitled, *Electronic Health Records: VA Making Incremental Improvements in New System but Needs Updated Cost Estimate and Schedule*, GAO explicitly recommended that VA "update the EHRM's modernization life cycle cost estimate to reflect the pause and subsequent changes," citing a 20-month deployment halt that rendered prior estimates obsolete. Additionally, numerous VA Inspector General reports have implicitly criticized the lack of dependable cost data for EHRM, urging better oversight that presupposes updated estimates. These recommendations collectively emphasize that, without a current cost estimate, VA cannot justify – and Congress cannot have confidence in - continued EHRM investment or viability.

The need for a cost estimate is further underscored by practical necessity. Without a reliable cost estimate, VA risks budget overruns, schedule delays, and diminished congressional trust.

Compliance with these laws, directives, and GAO recommendations is a critical step to ensuring EHRM's success and accountability.

To that end, please provide a detailed schedule and a cost estimate for EHRM before September 30<sup>th</sup>, 2025. GAO's Cost Estimating Guide provides a best-practice benchmark. This request aligns with persistent calls for transparency and accountability, ensuring that Congress can fully assess EHRM's financial and operational readiness to safeguard veterans' and taxpayers' interests before further rollouts begin.

Sincerely,



Jerry Moran  
Chairman  
Senate Committee on Veterans' Affairs



Richard Blumenthal  
Ranking Member  
Senate Committee on Veterans' Affairs



Mike Bost  
Chairman  
House Committee on Veterans' Affairs



Mark Takano  
Ranking Member  
House Committee on Veterans' Affairs



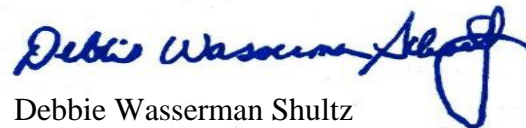
John Boozman  
Chairman  
Senate Appropriations Subcommittee  
on Military Construction,  
Veterans' Affairs, and Related Agencies



Jon Ossoff  
Ranking Member  
Senate Appropriations Subcommittee  
on Military Construction,  
Veterans' Affairs, and Related Agencies



John Carter  
Chairman  
House Appropriations Subcommittee  
on Military Construction,  
Veterans Affairs', and Related Agencies



Debbie Wasserman Shultz  
Ranking Member  
House Appropriations Subcommittee  
on Military Construction,  
Veterans Affairs', and Related Agencies