US DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

DEPARTMENT OF VETERANS AFFAIRS

Review of Contracts Terminated for Convenience

Review | 25-03033-230 | September 22, 2026

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Executive Summary

The VA Office of Inspector General (OIG) reviewed VA contracts "terminated for convenience"—that is, contracts that the government ended because it was in its best interest—after receiving a request on June 13, 2025, from Senator Richard Blumenthal, the ranking member of the US Senate Committee on Veterans' Affairs, and committee member Senator Angus King. The senators asked the OIG to review the cancellation of VA contracts that began after January 20, 2025, to identify which contracts were canceled, reduced in scope, stopped, or allowed to expire as part of this cancellation effort. They cited concerns with the impact of the cancellations, the use of artificial intelligence and algorithms in decision-making, the input of VA career subject matter experts, contingency plans to replace services provided from a canceled contract, and the financial transfer of funding from canceled contracts to other VA activities. To address the senators' concerns, the OIG team reviewed (1) the process VA used to select contracts for termination and (2) the accuracy of the number of terminated contracts and their associated values reported by VA.[1]

In November 2025, the VA Secretary announced that all VA procurement staff would be operationally and administratively realigned under the Office of Acquisition, Logistics, and Construction (OALC).[2] As of May 31, 2026, the realignment structure was approved, with full completion of the realignment anticipated by September 20, 2026. Although VA is realigning acquisition responsibilities, the actions discussed in this review occurred before the realignment.

The OIG presented preliminary findings to OALC officials in January 2026. The officials agreed with the results and took corrective actions to update and improve the clarity of a list VA subsequently submitted to Congress on April 13, 2026. During the meeting, the OALC principal executive director said the realignment of VA's procurement offices into OALC will provide better control, oversight, and data management of VA's contracts, which could help streamline similar widespread reviews if they occur in the future.

What the Review Found

During its review, the OIG found that from January through June 2025, VA received several requests from the General Services Administration, VA senior advisers, and representatives of the Department of Government Efficiency to terminate certain contracts. To reduce the risk of terminating critical contracts, VA implemented procedures to review the contracts before

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[1] Inspector General Cheryl L. Mason recused herself from this review based on her previous position as a senior adviser to the VA Secretary.

[2] VA Secretary, "Enterprise Coordination to Realign All Procurement Staff under the Department of Veterans Affairs Chief Acquisition Officer," memorandum to under secretaries, assistant secretaries, and other key officials, November 19, 2025.

terminating them. Although the speed and volume of the requests created challenges for VA staff, VA contracting officials generally complied with Federal Acquisition Regulation (FAR) requirements for terminating contracts.

The OIG determined that VA terminated 435 contracts for convenience—valued at about $1.1 billion—out of the 2,210 contract actions that the OIG reviewed. While the senators asked the OIG to review the cancellation of contracts specifically, the OIG observed that the cancellation request process under review involved individual contract actions. As defined in the FAR, a contract may encompass multiple contract actions including delivery orders, task orders, or purchase orders. This means that in some cases, parts of a contract (rather than an entire contract) were terminated. So, although there may be one contract, the number of contract actions associated with that contract may be significantly higher. The remaining 1,775 contract actions the OIG reviewed were reinstated or never terminated for convenience, which could indicate they were considered for termination before officials decided to keep them. That said, the OIG found errors in the data submitted to Congress in May and July 2025. As noted, in April 2026, VA submitted to Congress an updated list with improved clarity.

This report makes no recommendations that necessitate an action or response by VA. The executive director of the Office of Procurement concurred with the draft report and provided no additional comments. Appendix B provides the full text of the executive director's response.

Larry M. Reinkemeyer

LARRY M. REINKEMEYER
Assistant Inspector General
for Audits and Evaluations

Contents

Abbreviations

CMSO	Category Management Support Office
FAR	Federal Acquisition Regulation
GSA	General Services Administration
OALC	Office of Acquisition, Logistics, and Construction
OIG	Office of Inspector General
VHA	Veterans Health Administration

Introduction

On June 13, 2025, Senator Richard Blumenthal, the ranking member of the US Senate Committee on Veterans' Affairs, and committee member Senator Angus King requested that the VA Office of Inspector General (OIG) review VA contracts "terminated for convenience"—that is, contracts that the government ended because it was in its best interest. The senators asked for a review of contracts that began after January 20, 2025, to identify which contracts were canceled, reduced in scope, stopped, or allowed to expire as part of this cancellation effort. They were concerned with the impact of the cancellations, the use of artificial intelligence and algorithms in decision-making, the input of VA career subject matter experts, contingency plans to replace services provided from a canceled contract, and the financial transfer of funding from canceled contracts to other VA activities.

To address these concerns, the OIG team reviewed (1) the process VA used to select contracts for termination and (2) the accuracy of the number of terminated contracts and their associated values reported by VA.[3] While the senators asked the OIG to review the cancellation of contracts specifically, the OIG observed that the cancellation request process under review involved individual contract actions. As defined in the Federal Acquisition Regulation (FAR), a contract may encompass multiple contract actions including delivery orders, task orders, or purchase orders. This means that in some cases, parts of a contract (rather than an entire contract) were terminated. As a result, the OIG refers to contract actions rather than contracts throughout this review.

VA has the second largest acquisition budget in the federal government, obligating $78.3 billion for contracts in fiscal year 2025.[4] The Office of Acquisition, Logistics, and Construction (OALC) directs VA's acquisition functions. Within OALC, the Office of Procurement, Acquisition, and Logistics provides acquisition support for VA. The Category Management Support Office (CMSO)—within the OALC Office of Procurement, Acquisition, and Logistics—oversees and manages VA's category management initiative and data analytics. VA also has 10 contracting offices with senior officials, referred to as heads of contracting activities, who are responsible for managing the department's contracting operations. These operations include appointing and overseeing contracting officers and ensuring contracts are awarded and administered in compliance with policies. VA contracting officers award and manage their assigned contracts, which include contract actions and orders awarded from governmentwide contracts managed by the General Services Administration (GSA).

[3] Inspector General Cheryl L. Mason recused herself from this review based on her previous position as a senior adviser to the VA Secretary.

[4] VA OIG analysis of data from USASpending.gov.

Several events in early 2025 occasioned a review of VA contracts. First, on January 20, 2025, the President issued Executive Order 14151, which required the cancellation of diversity, equity, and inclusion activities in the federal government.[5] Next, on February 11, 2025, the VA Secretary established a team to identify and implement cost-saving measures across VA, including a comprehensive review of all VA contracts based on recent presidential directives. In particular, the Secretary directed the team to look for contracts that supported mentors, consultants, coaches, and advisers; contracts for consulting or data research services that only delivered reports or advice; and contracts that would be deemed wasteful by an average person.[6] The team was directed to develop a plan of action within two weeks of this initial request. In addition, on February 26, 2025, the President's Executive Order 14222 directed each agency to review all existing contracts and terminate or modify contracts "to reduce overall Federal spending or reallocate spending to promote efficiency and advance the policies of [the] Administration."[7]

The federal government's acquisition policies and procedures are codified in FAR 1.101 as amended by the Revolutionary FAR Overhaul implemented in August 2025. According to the FAR, the government has the unilateral right to partially or completely terminate a contract for "its sole convenience" without being required to pay damages, in terms of lost future revenue as a result of the termination. The government does not need a reason to terminate a contract for convenience, other than that it is in the government's best interest to do so. However, of note, the FAR requires that the government pay the contractor fairly for its expended efforts up to the contract termination, including settlement costs: reasonable expenses a contractor incurs to close out work after the government ends a contract early.

[5] Exec. Order No. 14151, 90 Fed. Reg. 8339 (January 20, 2025).

[6] VA Secretary, "Establishment of Fiscal Responsibility Action Team and Implementation of Immediate Cost-Saving Measures (VIEWS 12739356)," memorandum to under secretaries, assistant secretaries, and other key officials, February 11, 2025.

[7] Exec. Order No. 14222, 90 Fed. Reg. 11095 (February 26, 2025).

Results

Finding: VA Established Review Procedures Before Terminating Contracts but Submitted Inaccurate Data to Congress

From January through June 2025, VA received several requests from GSA, VA senior advisers, and the Department of Government Efficiency to terminate certain contracts. To reduce the risk of ending critical services, VA established procedures to review the contracts before acting on the requests. Despite challenges created by the speed and volume of these requests, VA contracting officials generally complied with FAR requirements when terminating contracts.

Of the 2,210 contract actions the OIG reviewed, the team determined that VA terminated 435 contracts for convenience valued at about $1.1 billion. The remaining 1,775 contract actions reviewed were either reinstated or never terminated for convenience, which may indicate they were considered for termination before officials decided to retain them. In addition, the OIG found errors in the data VA submitted to Congress. According to the OALC principle executive director, officials who contributed to the information provided to Congress were unfamiliar with contracting and acquisition terminology, which may have caused the mischaracterization of the data.

The OIG communicated its preliminary findings to OALC officials in January 2026. Based on these findings, OALC took corrective actions to update and improve the clarity of a list VA subsequently submitted to Congress on April 13, 2026.

What the OIG Did

The team obtained and reviewed several lists of contract actions that were identified for termination from February through July 2025. The OIG created a population of 2,210 contract actions for review. The population was generated from the lists VA used to make public statements on February 25, 2025, and March 3, 2025, about terminated contracts and the two lists that VA reported to Congress on May 16, 2025, and July 3, 2025. VA may have evaluated and terminated additional contracts that were not included in these four lists. The team reviewed contract files for all 2,210 contract actions to evaluate contract costs, termination notices and statuses, and settlement costs. The team also obtained and evaluated thousands of emails, which included guidance and direction to identify, justify, or terminate contracts. See appendix A for more on the review's scope and methodology.

Procedures to Identify and Review Contracts

From January through June 2025, GSA, VA senior advisers, and Department of Government Efficiency representatives sent dozens of instructions for VA officials to identify, review, and terminate contract actions. CMSO coordinated VA's efforts to compile lists and worked with senior OALC officials to direct VA heads of contracting activities, administrations, and staff offices.

A CMSO official explained that most of the contract actions were identified by searching for contracts using certain North American Industry Classification System and product service codes, which are standardized contract codes that indicate the nature of the work procured by a contract. In response to initial GSA and Department of Government Efficiency requests, CMSO officials created a list of professional services and consulting contracts on February 6, 2025, using these established and standardized codes—not a Department of Government Efficiency artificial intelligence program. Most of the contracts that were ultimately terminated were included in this list. In the subsequent days and weeks after CMSO officials created the initial list, they continued to obtain and refine lists of contracts, and they tracked, monitored, and updated the lists as contracts were added or removed.

To reduce the risk of terminating critical contracts, a VA senior adviser and the OALC principal executive director established procedures in February 2025 for the VA administrations, staff offices, and contracting offices to review the lists of contracts identified for termination. The OALC principal executive director requested that each office provide justification to keep critical contracts and identify the potential impact to veteran care and benefits if contracts were terminated. The offices were required to explain why the contracts were critical to veterans and VA's mission and to describe the positive impacts they delivered. To do so, a VA senior adviser and the OALC principal executive director asked VA contracting staff to complete a questionnaire for each contract proposed for termination. The responses were required to be reviewed and approved by the deputy under secretary or the deputy assistant secretary, as well as senior advisers to the Secretary. The questionnaire asked the following:

- Can the task be completed by VA employees?
- How long would it take to have VA employees start doing the task?
- How would terminating the contract affect veterans?

The questionnaire also included a rating scale to determine whether the contract provided

1. direct care to a veteran or beneficiary;
2. specialized skills that VA could not easily hire;
3. temporary contract support for surge situations;
4. outsourced services that could be completed by VA employees, such as call centers, training, or planning; or
5. administrative support, such as scheduling or travel coordination.

Speed of the Identification and Termination Process

The OIG found the speed and volume of the process created challenges for VA staff. From February through June 2025, OALC and VA senior advisers issued at least 47 orders to VA contracting officials to justify contracts, terminate contracts, pause termination, or reinstate contracts. In addition, VA senior advisers; OALC officials; and heads of contracting activities, contracting offices, and program offices exchanged numerous follow-up emails regarding the requests.

In some cases, VA officials were given two weeks to complete their review; in others, they were given only a few hours to review hundreds of contracts. For example, on February 21, 2025, the OALC principal executive director and a senior adviser to the Secretary directed the heads of contracting activities, administrations, and staff offices to review 1,049 contract actions. The offices were given less than 11 hours to complete their review, obtain approval from the deputy under secretaries or deputy assistant secretaries and senior advisers, and submit responses to OALC.

According to the OALC principal executive director, some offices did not complete their review by the deadline. However, the CMSO director said VA senior advisers and Department of Government Efficiency representatives directed them to terminate the contracts on February 25, 2025, regardless of the incomplete reviews. The OALC principal executive director explained that, as the reviews and justifications continued to come in, the proposed list of contracts for termination decreased from February through March 2025. Figure 1 depicts key events and the status of the proposed list of contracts in February and March 2025.

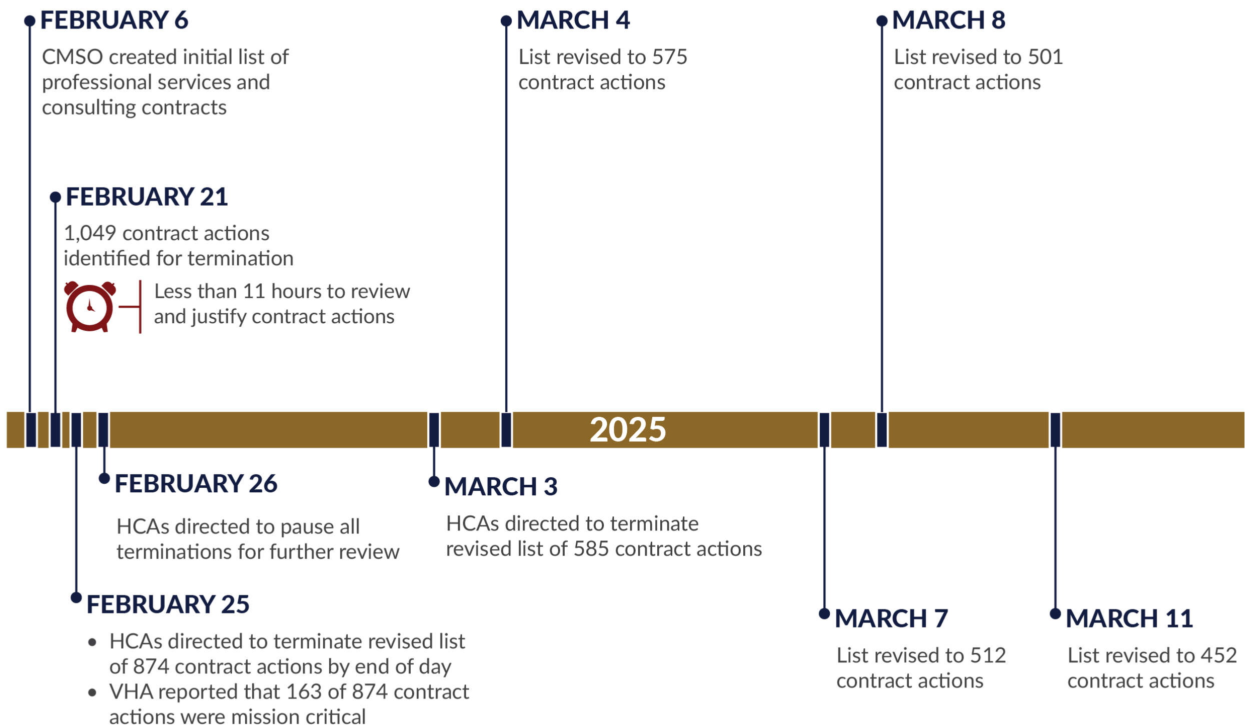

Figure 1. *Timeline of key events from February through March 2025.*

Abbreviations: HCA, head of contracting activity; VHA, Veterans Health Administration.

Source: VA OIG analysis of emails and lists of contracts.

OALC and Veterans Health Administration (VHA) officials told the OIG team that all the instructions received to identify, review, and terminate contracts, which included different lists of contracts, made tracking difficult. The OIG observed that the lists were inconsistently formatted, and some contained the same contract actions multiple times. Additionally, VHA contracting officials explained they received directions to terminate contracts from multiple sources—including OALC, VA senior advisers, and Department of Government Efficiency representatives. This caused confusion and frustration. As a result, VA and VHA contracting officials reported they had to dedicate staff full time to track and monitor the lists and correspondence. To better track and monitor the lists and correspondence, OALC created a database in April 2025.

Although the speed and volume of requests created challenges for VA acquisition staff, the OIG found that VA contracting officials generally complied with FAR requirements for terminating contracts. Specifically, VA contracting offices implemented procedures to issue stop-work orders or termination notices to contractors, as required by FAR 49.102, which also says contracting officers can amend the notices to correct errors or rescind them, if appropriate. Accordingly, contracting officers then issued contract modifications to finalize the termination or rescind the termination notices, as necessary. Finally, as addressed earlier, provisions of the FAR state that the government must pay the contractor fairly for its expended efforts up to the contract termination, including settlement costs: reasonable expenses a contractor incurs to close out work after the government ends a contract early. Therefore, contracting officers obtained proposals and negotiated settlement costs with contractors, when necessary, and documented the agreements through contract modifications.[8]

Contracts Terminated

The OIG determined that, of the 2,210 contract actions reviewed, VA terminated 435 for convenience, with total contract values of about $1.1 billion. The total contract value is the full cost of everything agreed upon for the entire project or service period, but it does not reflect how much of the contract cost has been paid or any settlement costs. The OIG also found that contracting officers initially terminated an additional 100 contract actions but later reinstated them. The contract value of these actions totaled about $1.1 billion. For example, on February 25, 2025, a contracting officer terminated a contract that provided financial audit services of invoices from medical disability exam contractors, then they reinstated it on August 1, 2025.

The remaining 1,675 contract actions the OIG team reviewed were never terminated for convenience. Some received stop-work orders or termination notices but were ultimately not terminated, indicating they were considered for termination before final decisions were made to keep them. The review team did not evaluate whether these contracts were reduced in scope or whether VA decided not to exercise contract option periods that would extend the contract’s performance period. Table 1 summarizes contract action information by the date of the termination list.

Table 1. Contract Actions by Date of Termination List

Date of termination list	Number of reported contract actions	Number of unique contract actions	Terminated	Terminated then reinstated	Never terminated
February 25, 2025	874	848	372	99	377
March 3, 2025	585	562	362	49	151
May 16, 2025	447	446	357	11	78
July 3, 2025	1,667	1,664	349	17	1,298
(Appeared on multiple lists)	—	*(1,310)*	*(1,005)*	*(76)*	*(229)*

[8] FAR 49.104; FAR 49.105; FAR 49.109-1; FAR 52.212-4.

Date of termination list	Number of reported contract actions	Number of unique contract actions	Terminated	Terminated then reinstated	Never terminated
Total contract actions reviewed*	**—**	**2,210**	**435**	**100**	**1,675**

Source: VA OIG analysis of VA's contract files.
** The OIG team subtracted duplicate actions from the total to ensure each discrete action was counted only once.*

The OIG found that most of the terminated contracts were categorized as consulting services, as shown in figure 2, which was consistent with goals the VA Secretary established in February 2025. The consulting services predominantly included management consulting services, such as administrative management, program management, and strategic communications.

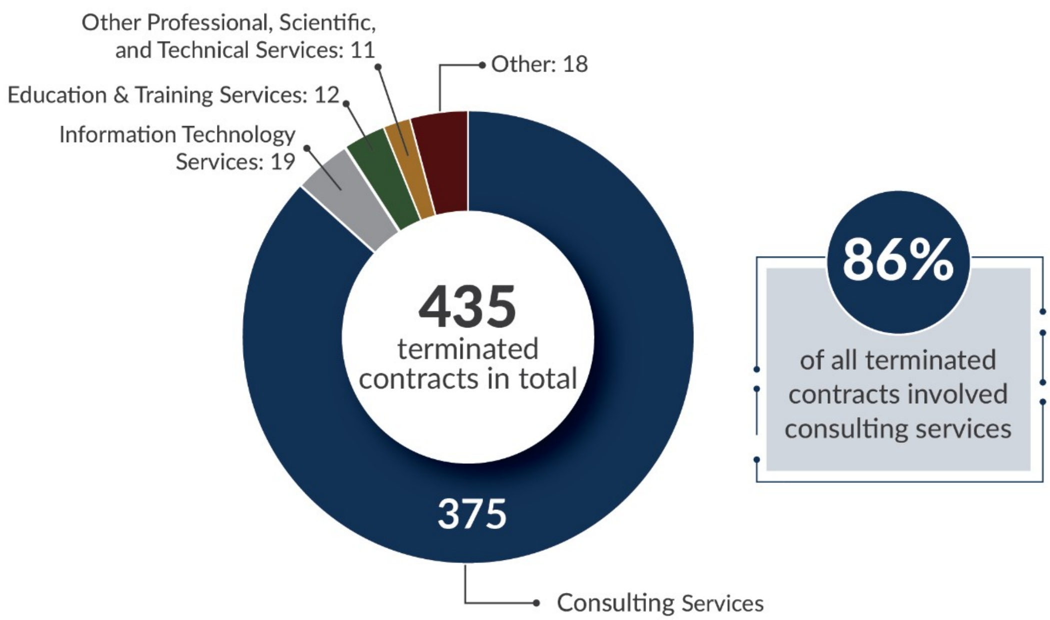

Figure 2. *Categories of terminated contracts.*
Source: VA OIG analysis of VA's contract files.

Of the contract actions reviewed, VA contracting officers completed settlement agreements for 267 of the 435 terminated contracts. Of the 267 settlement agreements, 150 were no-cost settlements, as required by FAR 49.101. For the remaining 117 settlements, contracting officers agreed to pay about $10.6 million of settlement costs. Since FAR 49.206-1 states contractors have up to a year to submit settlement proposals, VA may have settled additional terminations in the subsequent months after the OIG completed its review.

Data Provided to Congress

VA submitted two lists of terminated contracts to Congress: one on May 16, 2025, and another on July 3. Both lists of terminated contracts were incomplete and inaccurate. The May list reported that VA terminated and closed 446 contract actions with total contract values of about $120.9 billion. In an email that accompanied the list, VA said it did not include contracts that were modified to reduce their scope—implying all contracts listed were fully terminated.

However, the OIG team found that, as of April 30, 2026, VA terminated only 357 of the 446 contract actions from this list. The list included 11 contract actions that were terminated then later reinstated and 78 contract actions that were not terminated for convenience. Additionally, the list contained 16 contract actions with total contract values of $1 billion or greater, although the OIG found that none of those 16 actually exceeded $150 million. For example, a contract action was reported at over $21 billion, but its actual estimated total value was just over $74 million. A CMSO official explained that VA created a dashboard to track the terminated contracts, which miscalculated the contract values. The same CMSO official said many of the errors in this first list occurred due to individuals' lack of familiarity with contracting processes and terminology.

On July 3, 2025, VA submitted another list of contracts to Congress and reported in an email accompanying the list that VA terminated or was terminating 1,667 contracts. The actual list included only 1,664 contract actions and reported a combined total contract value of over $1.4 billion. The OIG found that VA terminated only 366 of these contract actions, 17 of which it later reinstated. According to the OALC principle executive director, like the first list, VA senior advisers and Department of Government Efficiency representatives who contributed to the information provided to Congress were unfamiliar with contracting and acquisition terminology, which may have caused mischaracterizations in the list.

Furthermore, a CMSO official added that Department of Government Efficiency representatives wanted to claim credit for any contracts that ended, including those that simply reached the end of their performance period, such as completed supply and installation contracts. Specifically, the second list included 974 supply-related contract actions that were not terminated, such as those for prosthetics, surgical implants, and wheelchair ramps. It also included 151 healthcare-related contract actions that were not terminated, including orders for nursing home services. Other contract actions misclassified as terminated included those for facility operations, construction, and information technology services.

In January 2026, the OIG briefed OALC officials on its preliminary results. The officials said they were preparing an updated list of terminated contracts to submit to Congress that captured all contracts terminated from January 2025 through January 2026. Based on the OIG's briefing, OALC officials updated their list to clarify which contracts VA terminated, reduced in scope, or chose not to exercise contract option periods for. VA submitted the updated data to Congress on April 13, 2026. The OIG team did not review the accuracy or completeness of the data in that submission but confirmed that VA continued to review and terminate contracts beyond the scope of the OIG's review. Therefore, the OIG is not making any recommendations based on its review.

Conclusion

Despite a challenging and fast-paced process, VA officials implemented procedures to review contracts before terminating them, which reduced the risk of terminating critical services. Of the 2,210 contracts the OIG reviewed, the team determined VA terminated 435. However, according to OALC officials: Because the officials who contributed to the data submitted to Congress were not familiar with contracting or acquisition terminology, VA submitted inaccurate data to Congress in May and July 2025. VA has since provided Congress with updated and clearer information on the contracts that it terminated.

VA Management Comments

The executive director of the Office of Procurement concurred with the draft report and provided no additional comments. Appendix B provides the full text of the director's response.

Appendix A: Scope and Methodology

Scope

The review team conducted its work from July 2025 through August 2026. The team reviewed contracts VA reported that it terminated for convenience from February through July 2025.[9]

Methodology

The team obtained and reviewed several lists of contract actions that were identified for termination from February through July 2025. The team created a population of 2,210 contract actions for review based on the concerns about VA's public statements and the data submitted to Congress cited in the congressional request. Specifically, the OIG's population of contract actions included the lists VA used to make public statements on February 25, 2025, and March 3, 2025, about terminated contracts and the two lists that VA reported to Congress on May 16, 2025, and July 3, 2025. From those lists, the team identified 2,210 unique contract actions after removing actions that occurred multiple times within a list or appeared on more than one of the lists.

The team reviewed contract files for all 2,210 contract actions to evaluate contract costs, termination notices and statuses, and settlement costs. The team did not evaluate whether contracts were reduced in scope or whether VA chose not to exercise contract option periods, which extend a contract's performance, given that these actions do not result in a termination for convenience. The team also obtained and evaluated thousands of emails, which included guidance and direction to identify, justify, or terminate contracts.

Internal Controls

The team determined that performing an internal control step was not necessary unless internal control deficiencies were noted during the review. The team did not find any significant internal control deficiencies.[10]

Data Reliability

The team reviewed computer-processed data obtained from OALC officials such as manually created and system-created Excel spreadsheets of contracts considered for termination. The team compared the lists of contracts to contract source documents in VA's electronic contract management system, VA's Integrated Financial and Acquisition System, and the Federal

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[9] The project was on hold from October 1, 2025, until November 13, 2025, due to the federal government shutdown.

[10] Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-25-107721, May 2025.

Procurement Data System. Specifically, the team reviewed the contracts, modifications, and termination documentation for all 2,210 contracts in its population. Through its review, the team identified errors in the data that it incorporated into its reported findings. The team relied on federal procurement data only for coding and total contract values, which were assessed as sufficiently reliable through completed data reliability checklists. Other computer-processed data sources were used only for comparison or contextual understanding, not to support reported findings.

Government Standards

The OIG conducted this review in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*.[11]

[11] Council of the Inspectors General on Integrity and Efficiency, *Quality Standards for Inspection and Evaluation*, December 2020.

Appendix B: VA Management Comments

Department of Veterans Affairs Memorandum

Date: August 31, 2026

From: Executive Director, Office of Procurement (003A)

Subj: Draft Report, Review of Contracts Terminated for Convenience [2025-03033-AE-0121]

To: Healthcare Contracts & Special Projects (52D04)

1.The Office of Procurement (OOP) completed its review of the subject Draft Report and concur without comment.

The OIG removed point of contact information prior to publication.

(Original signed by)

Jeffrey C. Neill

The text of VA's management comments is reprinted verbatim as received from the department. For accessibility, the original format of this appendix has been modified to comply with section 508 of the Rehabilitation Act of 1973, as amended.

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