



# The Veterans Health Administration

## A Guide for Advocates

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## Overview of the Veterans Health Administration

This guide for advocates provides a primer on the Veterans Health Administration through answering common questions about the VA health care system.<sup>1</sup> Advocates with further questions and veterans having problems accessing care should call the Pennsylvania Health Law Project's toll-free Helpline at (800) 274-3258.

### Who is a veteran for purposes of receiving VA health care?

As a preliminary matter, a veteran must (i) have fulfilled at least twenty-four months of active duty service<sup>2</sup> and (ii) have an "other than dishonorable discharge"<sup>3</sup> to be eligible for VA health care. The VA makes a number of exceptions to the twenty-four month service requirement, including one for reservists and National Guard members who have been called to and complete a term of active duty service.

### Are all veterans meeting the VA's service and discharge requirements eligible to receive VA health care?

No. Beyond the preliminary requirements, a veteran's eligibility for VA health care is generally conditioned on having a service-connected disability\* or on having income and assets below certain thresholds. The only veterans thus not eligible for VA health care are those who do not have a service-connected disability and who have income above a certain threshold. The main exception to these two central eligibility categories is for combat veterans,<sup>4</sup> who have special eligibility to receive care for up to five years following their discharge from active duty.

Unlike Medicaid, which requires an individual to be both categorically and financially eligible, VA health care requires a veteran to be either categorically eligible or financially eligible.

\*A service-connected disability is a disability that the VA has determined was incurred or aggravated during military service. The VA determines whether a disability is service-connected, and if so, whether it is compensable and at what rate, in adjudicating a claim for disability compensation.

### How does the Veterans Health Administration work?

Following legislation passed in 1996, the Veterans Health Administration ("VHA") expanded eligibility and shifted from a hospital-based model to an outpatient and home and community-based care model. Currently, the VA operates 154 medical centers, approximately 1300 community-based outpatient clinics, and 232 readjustment counseling centers nationally. To

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<sup>1</sup> A note on terminology: the term "VA" is often loosely used to refer to the U. S. Department of Veterans Affairs or any entity within it. The Department is comprised of the Veterans Benefits Administration ("VBA"), the Veterans Health Administration ("VHA"), and the (much smaller) National Cemetery Administration.

<sup>2</sup> The minimum service requirement does not apply to veterans who enlisted before September 8, 1980. 38 C.F.R. § 3.12a(c).

<sup>3</sup> The character of discharge standard the used by the VA, "other than dishonorable," does not precisely align to the discharge classifications used by the service branches, *see* 38 C.F.R. § 3.12, making this an issue around which advocacy can be beneficial.

<sup>4</sup> Combat veterans are those who served in a theater of combat operations after November 11, 1998. 38 U.S.C. § 1710(e)(1)(D).

manage demand, the VA uses an enrollment system in which veterans are assigned to a priority enrollment group based on their categorical or financial eligibility.

| <b>Priority Enrollment Groups</b> |  |
|-----------------------------------|--|
| 1                                 | Veterans with a service-connected disability (“SCD”) rated 50% or more, or determined to be unemployable because of a SCD  |
| 2                                 | SCD 30% or 40%   |
| 3                                 | SCD 10% or 20%, former Prisoners of War, veterans awarded a Purple Heart, and veterans whose discharge was for a disability incurred or aggravated in the line of duty |
| 4                                 | Veterans receiving aid & attendance or housebound benefits   |
| 5                                 | Non-SCD or SCD 0% (non-compensable) veterans with income and net worth below the VA means test threshold   |
| 6                                 | Combat veterans seeking care within five years of discharge, and SCD 0% (compensable)  |
| 7                                 | Non-SCD and SCD 0% (non-compensable) veterans with income and net worth above the VA national threshold but below the geographically-based threshold                   |
| 8*                                | All other non-SCD veterans who agree to pay copays.<br>*Effective Jan. 17, 2003, the VA no longer enrolls new veterans into priority group 8.                          |

Once enrolled in the VHA, a veteran can receive care and services from a VHA provider for any illness or condition. Stated differently, enrolled veterans can receive care for all of their health care needs, not just for service-connected disabilities. Note, though, that the VHA does not function as an insurance program. With certain limited exceptions, such as when the VHA contracts with a non-VA provider on a “fee basis” arrangement, enrolled veterans must access care from a VA medical center or community-based outpatient clinic.

**What are the income thresholds for enrollment for veterans who do not have a service-connected disability?**

Veterans who do not have a service-connected disability may be eligible for VA health care, under either priority group five or seven, on the basis of having income and assets below a certain threshold. The VA generally considers income received in the calendar year prior to application, but may use a projected income for the current year “to avoid a hardship to a veteran.”<sup>5</sup> Unreimbursed medical expenses in excess of five percent of the annual pension rate incurred in the previous year can be deducted from income for enrollment purposes.

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<sup>5</sup> 38 C.F.R. § 17.36(b)(7)

A veteran can enroll into **priority group five** if he or she (a) is Medicaid eligible, (b) is receiving a VA pension benefit<sup>6</sup>, or (c) has an annual income within the VA national means test threshold. In 2009, the VA national means test threshold is:

|  |                        |                         |                                    |
|--|------------------------|-------------------------|------------------------------------|
| Vet only                                   | Vet plus one dependent | Vet plus two dependants | For each additional dependent, add |
| \$29,402                                   | \$35,284               | \$37,304                | \$2,020                            |
| Net worth threshold: \$80,000 <sup>7</sup> |                        |                         |                                    |

If ineligible for priority group five, a veteran will be considered for **priority group seven**, which requires co-pays for all care and services received. The priority group seven thresholds track the geographical income limits established by the U.S. Dept. of Housing and Urban Development for the public housing and section 8 programs.<sup>8</sup> Currently, the geographic means test (“GMT”) thresholds for some areas in Pennsylvania are:

|                |   | Vet only | Vet +1   | Vet +2   |
|----------------|---|----------|----------|----------|
| Dauphin County | Harrisburg-Carlisle, PA MSA                     | \$37,800 | \$43,200 | \$48,600 |
| Phila. County  | Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA | \$41,600 | \$47,550 | \$53,500 |
| Allegheny      | Pittsburgh, PA                                  | \$33,600 | \$38,400 | \$43,200 |

See the attached two pages of the “VA Geographic 2008 Income Thresholds” for a more detailed listing of the GMT thresholds for all of the Pennsylvania counties.<sup>9</sup>

Prior to January 2003, veterans whose incomes exceeded the GMT threshold were enrolled into priority group eight. In January 2003, the VA suspended enrollment into priority group eight. As of April 2009, however, new regulations have been proposed that would allow priority group eight enrollment for veterans whose income does not exceed the GMT threshold by more than 10%.

### What care and services does the VHA provide?

The VHA provides all enrolled veterans with a standard “medical benefits package”<sup>10</sup> that includes:

<sup>6</sup> A VA pension is a means-tested benefit paid to wartime veterans who are permanently disabled or age 65 or older. It is not to be confused with a military pension, for which a service member is eligible after twenty years of active service.

<sup>7</sup> The net worth determination for purposes of healthcare eligibility is the same as that for purposes of pension eligibility, 38 C.F.R. § 17.47(d)(5), and excludes a veteran’s dwelling and any real and personal property consistent with a “reasonable mode of life,” 38 C.F.R. § 3.275(b).

<sup>8</sup> <http://www.va.gov/healtheligibility/Library/pubs/GMTIncomeThresholds/> Note that this is a very large file.

<sup>9</sup> As the VA uses a veteran’s income from the previous calendar year to determine eligibility, the current GMT income thresholds use 2008 data.

<sup>10</sup> See 38 C.F.R. § 17.38(a). Services specifically excluded from the medical benefits package include abortions and abortion counseling, in vitro fertilization, drugs and medical devices not approved by the FDA, and gender alterations. C.F.R. § 17.38(c).

- Outpatient medical, surgical, and mental health care
- Inpatient hospital, medical, surgical, and mental health care
- Prescription drugs on the VA national formulary
- Emergency care
- Maternity Care
- Preventive care
- Long term care
  - Including geriatric evaluation and management, adult day health care, respite care, home care, and hospice care

It also provides the following services with certain limitations or according to special enrollment categories:

- Dental care
- Durable Medical Equipment
- Prosthetic and orthotic devices
- Eyeglasses and Hearing aids
- Home health care
- Home improvements and structural alterations
- Long term care
  - Including nursing home care and domiciliary services
- Emergency care in non-VA facilities
- Payment of beneficiary travel

The VHA will provide care or a service included in the medical benefits package to individuals only if it is determined by an appropriate health care professional that the service is “needed to promote, preserve, or restore the health of the individual and is in accord with generally accepted standards of medical practice.”<sup>11</sup>

Generally, the VA will only provide care or services prescribed by a VHA provider. In some circumstances, such as where it is impractical for a veteran to visit a VA facility, the VA may authorize care by a non-VA provider on a “fee basis” arrangement.

### **What co-pays or deductibles does the VHA charge?**

Health care and services for a service-connected disability are always provided at no charge and with no copayment. For care of non-service connected conditions, the VA applies copay and deductible requirements according to the veteran’s priority enrollment group and the type of service provided.

As an example, an \$8 copay applies to outpatient medications, but only to veterans in priority groups two, three, five, seven, and eight. Even for vets in these priority groups, there is no copay if the medication is for a service-connected condition. See the attached VA Fact Sheet 164-8, “2009 Copay Requirements at a Glance,” for a listing of copay and deductible amounts and the priority groups to which they apply.

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<sup>11</sup> 38 C.F.R. § 17.38(b)

### **Can Medicare and Medicaid recipients receive VA health care?**

Yes. Insurance status is irrelevant to eligibility for VA health care, with one exception. A veteran who is eligible for Medicaid is also eligible for VA health care on the basis of her Medicaid eligibility.

When a Medicare recipient receives VA health care, the VA does not bill Medicare. The same is true for a Medicaid recipient, except that the VA should bill Medicaid (as a secondary insurance) for any copays or deductibles the veteran incurs.<sup>12</sup> When a veteran with commercial insurance receives VA health care, the VA bills that insurance for any care provided for a non-service-connected disability.

Enrollment in the VA health system is considered creditable coverage for purposes of Medicare Part D and enrolling in a new health plan under HIPAA.

### **Does the VA provide care to a veteran's spouse or children?**

Generally, no. The VA does administer the Civilian Health and Medical Program of the Department of Veterans Affairs ("CHAMPVA"), but this is a cost-sharing program that covers only a narrow subset of spouses and dependents.

To be eligible for CHAMPVA, a spouse or dependant cannot be eligible for TRICARE, the Department of Defense insurance program, and must fit into one of these categories:<sup>13</sup>

1. the spouse or child of a veteran who has been rated permanently and totally disabled for a service-connected disability, or
2. the surviving spouse or child of a veteran who died from a VA-rated service connected disability, or
3. the surviving spouse or child of a veteran who was at the time death rated permanently and totally disabled from a service connected disability, or
4. the surviving spouse or child of a military member who died in the line of duty, not due to misconduct.

### **Does a veteran have a right to appeal decisions made by the VHA?<sup>14</sup>**

Yes, a veteran can appeal both non-medical and medical decisions made by a VHA administrator or physician.

#### *Appeals of Non-medical Decisions*

For administrative and other non-medical decisions made by the VHA, such as decisions regarding eligibility for services outside of the standard medical benefits package, veterans have a statutory right of appeal to the Board of Veterans' Appeals ("BVA") and review by the Court of Appeals for Veterans Claims.<sup>15</sup> Due process protections attach to this right, including a right

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<sup>12</sup> See 55 Pa. Code § 1101.64.

<sup>13</sup> See 38 C.F.R. § 17.270-278.

<sup>14</sup> Note that advocates wishing to represent veterans before the BVA need to meet certain accreditation requirements. See 38 C.F.R. § 14.629(b).

<sup>15</sup> See 38 C.F.R. § 20.101(b) ("The Board's appellate jurisdiction extends to questions of eligibility for hospitalization, outpatient treatment, and nursing home and domiciliary care; for devices such as prostheses, canes, wheelchairs,

to written notice of (i) the decision and its justification and (ii) the right to appeal, including an explanation of the appeal process (VA Form 4107).<sup>16</sup> If the VA facility fails to provide written notice of a benefit denial, the veteran should insist on such notice.

To begin the BVA appeal process, a veteran must file a written “Notice of Disagreement,” which requires no standard form or language, within one year of the contested decision. The VHA will then provide the veteran with a “Statement of the Case,” which is a formal explanation of its decision. The veteran then has sixty days to file a “Substantive Appeal,” using VA Form 9, which the local VHA facility will certify and submit to the BVA.

In addition to the BVA appeal process, a veteran has a right to an optional “reconsideration procedure” following an administrative denial of a medical benefit.<sup>17</sup> To begin this procedure, a veteran must make a written reconsideration request to the director of her local VHA facility within one year of the denial, stating why the decision was erroneous and, if applicable, submitting new information not previously considered. (This reconsideration request is considered a Notice of Disagreement for purposes of the BVA appeal process.) As part of the reconsideration request, a veteran can request an in-person, informal hearing with the immediate supervisor of the initial VA decision-maker to discuss the matter. That supervisor must issue a written decision that affirms, reverses, or modifies the initial decision.

#### *Appeals of Medical Decisions*

To allow a veteran to contest a medical decision made by VA health care provider, the VA has established a “clinical appeals” process.<sup>18</sup> The clinical appeals process applies to disputes pertaining to the denial of clinical care, which are outside of the jurisdiction of the Board of Veterans’ Appeal.<sup>19</sup> The outcomes of the clinical appeal process are final, as a veteran has no right to judicial review of VHA medical decisions.

Where a dispute concerning a medical decision made by a VA provider cannot be resolved at the point of service, the veteran should be provided written notice of the facility’s final determination along with written notice of the clinical appeal process.<sup>20</sup> A veteran disputing a medical decision may need to insist that the facility provide written notice of the decision and his appeal rights. After a veteran files a clinical appeal, the appropriate regional Veterans Integrated Service Network (“VISN”) should:

- Ensure that the patient can be maintained safely in the current environment of care;

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back braces, orthopedic shoes, and similar appliances; and for other benefits administered by the Veterans Health Administration. . .”).

<sup>16</sup> See 38 C.F.R. § 3.103(b); VHA Guide to Processing Appeals (January 2004); VHA Directive 2008-039.

<sup>17</sup> See 38 C.F.R. § 17.133.

<sup>18</sup> See VHA Directive 2006-057, [http://www1.va.gov/VHAPUBLICATIONS/ViewPublication.asp?pub\\_ID=1494](http://www1.va.gov/VHAPUBLICATIONS/ViewPublication.asp?pub_ID=1494).

<sup>19</sup> See 38 C.F.R. § 20.101(b)(“ . . . Medical determinations, such as determinations of the need for and appropriateness of specific types of medical care and treatment for an individual, are not adjudicative matters and are beyond the Board's jurisdiction. Typical examples of these issues are whether a particular drug should be prescribed, whether a specific type of physiotherapy should be ordered, and similar judgmental treatment decisions with which an attending physician may be faced.”).

<sup>20</sup> See VHA Directive 2006-057

- Request documentation and supporting arguments from the facility and the patient (or representative) be submitted within one week;
- Independently review the documentation (“internal review”) or request, at the discretion of the VISN, an external peer review (“external review”) to determine whether “appropriate and/or reasonable and necessary clinical service was provided”<sup>21</sup>;
- Render a final decision within 30 days, if using the internal review process, or 45 days, if using the external review process, to the patient and the facility.

*Patient Advocacy Program*

In addition to the appeal mechanisms described above, each VA medical center is required to have at least one Patient Advocate on site who receives and responds, within seven days, to patient complaints.<sup>22</sup> Veterans do *not* have to attempt to resolve a dispute using a Patient Advocate before filing a non-medical or clinical appeal.

**Is VA health care an entitlement?**

No, the statutory requirement that the VA furnish health care to certain veterans is conditioned on Congress providing sufficient annual appropriations for such services.<sup>23</sup> As a practical matter, this dependency on funding is reflected in the suspension of enrollment group eight and in the substantial wait times many new enrollees experience.

**How can a veteran enroll in the VHA?**

Veterans can enroll in the VHA by mail or in person at any VA medical center or clinic. To enroll by mail, a veteran needs to complete a VA Form 10-10EZ (obtained at [www.VA.gov](http://www.VA.gov) or through calling 877-222-VETS) and mail or fax it to the VA medical center or clinic they wish to use. Appointments can be scheduled at the time an application is submitted. Certain new enrollees are accorded priority status and are supposed to have requested appointments scheduled within thirty days of the desired date.<sup>24</sup>

**Where are VHA facilities in Pennsylvania located?**

The VHA currently operates ten VA Medical Centers and thirty-four Community-Based Outpatient Clinics in Pennsylvania:

Medical Centers

|             |              |                |
|-------------|--------------|----------------|
| Altoona     | Erie         | Pittsburgh (3) |
| Butler      | Lebanon      | Wilkes-Barre   |
| Coatesville | Philadelphia |                |

Community-Based Outpatient Clinics

|           |            |             |
|-----------|------------|-------------|
| Allentown | Kittanning | Smethport   |
| Bangor    | Lancaster  | Spring City |

<sup>21</sup> *Id.*

<sup>22</sup> See VHA Handbook 1003.4, September 2, 2005.

<sup>23</sup> See 38 U.S.C.A. § 1710(a)(4).

<sup>24</sup> See VHA Directive 2006-028 (prioritizing care, among new enrollees with non-emergent and non-urgent conditions, for (i) veterans needing care for a service-connected condition and (ii) veterans with service-connected disabilities rated 50% or more needing care for any condition).



|             |               |               |
|-------------|---------------|---------------|
| Berwick     | Meadville     | Springfield   |
| Camp Hill   | Monaca        | State College |
| DuBois      | New Castle(2) | Tobyhanna     |
| Foxburg     | Oil City      | Uniontown     |
| Greensburg  | Philadelphia  | Warren        |
| Hermitage   | Pottsville    | Washington    |
| Horsham (2) | Reading(2)    | Wilkes-Barre  |
| Johnstown   | Sayre         | Williamsport  |
|             |               | York          |

**Is more information on the Veterans Health Administration available?**

For more information about the Veterans Health Administration, please call Pennsylvania Health Law Project's toll free Helpline at **(800) 274-3258** or **(866) 236-3610** TTY.

*The Pennsylvania Health Law Project provides free legal services and education to low-income individuals, seniors, and persons with disabilities with questions or problems accessing health care. PHLP also serves as a back-up center to local legal service programs and publishes two bi-monthly newsletters detailing the latest developments in civil health law for the poor. For information or assistance, call our statewide Helpline at (800) 274-3258 or (866) 236-3610 TTY.*

## 2009 Copay Requirements at a Glance

|   | <b>Inpatient</b><br>(\$10/day + \$1068 for first 90 days and \$534 after 90 days – based on 365-day period). | <b>Outpatient Care</b><br>(\$15 Primary Care; \$50 Specialty Care; \$0 for x-rays, lab, immunizations, etc.) | <b>Outpatient Medication</b><br>(\$8 per 30-day supply)<br>PG 2-6 Calendar Year cap - \$960 | <b>Extended Care Services</b><br>Institutional NHCU, Respite, Geriatric Eval - \$0-97 per day. Non-Institutional Respite, Geriatric Eval, ADHC - \$15 Domiciliary - \$5 |
|---|--|--|---|---|
| <b>Priority Group 1 (SC 50% or more)</b>  | No   | No   | No  | No  |
| <b>Priority Groups 2, 3 (SC 10% - 40%)</b><br>No medication copay for SC condition, ex-POW, in receipt of VA A&A, HB pension or income below applicable pension threshold | No   | No   | Yes   | No  |
| <b>Priority Group 4</b><br>Copay rules apply if placed from lower PG based on VHA catastrophic disability determination   | No   | No   | No  | No  |
| <b>Priority Group 5</b><br>No medication or extended care services copay if in receipt of VA pension or income below applicable pension threshold                         | No   | No   | Yes   | Yes   |
| <b>Priority Group 6 (Combat Veteran, SHAD, SC 0% compensable, ionization radiation)</b><br>Copay rules apply if unrelated to PG6 placement                                | No   | No   | No  | No  |
| <b>Priority Group 7</b><br>Inpatient copay is reduced 80% of full rate  | Yes  | Yes  | Yes   | Yes   |
| <b>Priority Group 8</b><br>Unless income is below applicable pension threshold for medication and extended care services copays   | Yes  | Yes  | Yes   | Yes   |

### Basic Business Rule

Cost Free Care and Medication for SC treatment, SC 50% or more, ex POWs, VA pensioners, under Special Authorities (e.g. PG 6, military sexual trauma, nasopharyngeal radium irradiation).

### OEF/OIF Combat Veterans Enhanced Eligibility for Health Care Benefits

\* Combat veterans discharged from active duty on or **after** January 28, 2003, are eligible for enrollment in Priority Group (PG) 6 for 5 years following discharge unless eligible for a higher enrollment priority (PG 1-5). Combat veterans discharged from active duty **before** January 28, 2003, who apply for enrollment on or after January 28, 2008, are eligible for enrollment in Priority Group 6 until January 27, 2011. After the special eligibility period ends, these veterans will be reassigned to appropriate PG and subject to copays, if applicable.

\* Copays only applicable for PG 6 combat veteran enrollees for care related to a condition that is congenital or developmental e.g., scoliosis, existed before military service (unless aggravated by combat service) or has a specific etiology that began after military service, such as a common cold, etc.

VA GMT 2008 Income Thresholds

| State | County Name       | MSA Name  | median<br>Income family<br>of 4 for 2008 | Veteran Only | Veteran Plus 1<br>Dependent | Veteran Plus 2<br>Dependents | Veteran Plus 3<br>Dependents | Veteran Plus 4<br>Dependents | Veteran Plus 5<br>Dependents | Veteran Plus 6<br>Dependents | Veteran Plus 7<br>Dependents |
|-------|-------------------|---|--|--------------|-----------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|
| OR    | Linn County       | Linn County, OR                                 | 53100                                    | 29900        | 34150                       | 38450                        | 42700                        | 46100                        | 49550                        | 52950                        | 56350                        |
| OR    | Malheur County    | Malheur County, OR                              | 43000                                    | 27050        | 30900                       | 34800                        | 38650                        | 41750                        | 44850                        | 47950                        | 51000                        |
| OR    | Marion County     | Salem, OR MSA                                   | 56200                                    | 31800        | 36350                       | 40900                        | 45450                        | 49100                        | 52700                        | 56350                        | 60000                        |
| OR    | Morrow County     | Morrow County, OR                               | 49400                                    | 27650        | 31600                       | 35550                        | 39500                        | 42650                        | 45800                        | 49000                        | 52150                        |
| OR    | Multnomah County  | Portland-Vancouver-Beaverton, OR-WA MSA         | 67500                                    | 38000        | 43450                       | 48900                        | 54300                        | 58650                        | 63000                        | 67350                        | 71700                        |
| OR    | Polk County       | Salem, OR MSA                                   | 56200                                    | 31800        | 36350                       | 40900                        | 45450                        | 49100                        | 52700                        | 56350                        | 60000                        |
| OR    | Sherman County    | Sherman County, OR                              | 53000                                    | 29700        | 33900                       | 38150                        | 42400                        | 45800                        | 49200                        | 52600                        | 55950                        |
| OR    | Tillamook County  | Tillamook County, OR                            | 48800                                    | 27450        | 31350                       | 35300                        | 39200                        | 42350                        | 45450                        | 48600                        | 51750                        |
| OR    | Umatilla County   | Umatilla County, OR                             | 52000                                    | 29100        | 33300                       | 37450                        | 41600                        | 44950                        | 48250                        | 51600                        | 54900                        |
| OR    | Union County      | Union County, OR                                | 48900                                    | 27600        | 31550                       | 35500                        | 39450                        | 42600                        | 45750                        | 48900                        | 52050                        |
| OR    | Wallowa County    | Wallowa County, OR                              | 46200                                    | 27050        | 30900                       | 34800                        | 38650                        | 41750                        | 44850                        | 47950                        | 51000                        |
| OR    | Wasco County      | Wasco County, OR                                | 51000                                    | 29000        | 33150                       | 37300                        | 41450                        | 44750                        | 48100                        | 51400                        | 54700                        |
| OR    | Washington County | Portland-Vancouver-Beaverton, OR-WA MSA         | 67500                                    | 38000        | 43450                       | 48900                        | 54300                        | 58650                        | 63000                        | 67350                        | 71700                        |
| OR    | Wheeler County    | Wheeler County, OR                              | 40700                                    | 27050        | 30900                       | 34800                        | 38650                        | 41750                        | 44850                        | 47950                        | 51000                        |
| OR    | Yamhill County    | Portland-Vancouver-Beaverton, OR-WA MSA         | 67500                                    | 38000        | 43450                       | 48900                        | 54300                        | 58650                        | 63000                        | 67350                        | 71700                        |
| PA    | Adams County      | Adams County, PA                                | 64200                                    | 35950        | 41100                       | 46200                        | 51350                        | 55450                        | 59550                        | 63650                        | 67800                        |
| PA    | Allegheny County  | Pittsburgh, PA HUD Metro FMR Area               | 60000                                    | 33600        | 38400                       | 43200                        | 48000                        | 51850                        | 55700                        | 59500                        | 63350                        |
| PA    | Armstrong County  | Armstrong County, PA HUD Metro FMR Area         | 49700                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Beaver County     | Pittsburgh, PA HUD Metro FMR Area               | 60000                                    | 33600        | 38400                       | 43200                        | 48000                        | 51850                        | 55700                        | 59500                        | 63350                        |
| PA    | Bedford County    | Bedford County, PA                              | 46900                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Berks County      | Reading, PA MSA                                 | 60500                                    | 36200        | 41350                       | 46550                        | 51700                        | 55850                        | 59950                        | 64100                        | 68250                        |
| PA    | Blair County      | Altoona, PA MSA                                 | 50700                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Bradford County   | Bradford County, PA                             | 50100                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Bucks County      | Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA | 74300                                    | 41600        | 47550                       | 53500                        | 59450                        | 64200                        | 68950                        | 73700                        | 78450                        |
| PA    | Butler County     | Pittsburgh, PA HUD Metro FMR Area               | 60000                                    | 33600        | 38400                       | 43200                        | 48000                        | 51850                        | 55700                        | 59500                        | 63350                        |
| PA    | Cambria County    | Johnstown, PA MSA                               | 47200                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Cameron County    | Cameron County, PA                              | 48400                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Carbon County     | FMR Area  | 65800                                    | 36900        | 42150                       | 47450                        | 52700                        | 56900                        | 61150                        | 65350                        | 69550                        |
| PA    | Centre County     | State College, PA MSA                           | 64200                                    | 35950        | 41100                       | 46200                        | 51350                        | 55450                        | 59550                        | 63650                        | 67800                        |
| PA    | Chester County    | MD MSA  | 74300                                    | 41600        | 47550                       | 53500                        | 59450                        | 64200                        | 68950                        | 73700                        | 78450                        |
| PA    | Clarion County    | Clarion County, PA                              | 46700                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Clearfield County | Clearfield County, PA                           | 45200                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Clinton County    | Clinton County, PA                              | 46700                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Columbia County   | Columbia County, PA                             | 49500                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Crawford County   | Crawford County, PA                             | 46600                                    | 28850        | 32950                       | 37100                        | 41200                        | 44500                        | 47800                        | 51100                        | 54400                        |
| PA    | Cumberland County | Harrisburg-Carlisle, PA MSA                     | 67500                                    | 37800        | 43200                       | 48600                        | 54000                        | 58300                        | 62650                        | 66950                        | 71300                        |
| PA    | Dauphin County    | Harrisburg-Carlisle, PA MSA                     | 67500                                    | 37800        | 43200                       | 48600                        | 54000                        | 58300                        | 62650                        | 66950                        | 71300                        |
| PA    | Delaware County   | MD MSA  | 74300                                    | 41600        | 47550                       | 53500                        | 59450                        | 64200                        | 68950                        | 73700                        | 78450                        |
| PA    | Elk County        | Elk County, PA                                  | 56600                                    | 31700        | 36250                       | 40750                        | 45300                        | 48900                        | 52550                        | 56150                        | 59800                        |
| PA    | Erie County       | Erie, PA MSA                                    | 54100                                    | 30400        | 34750                       | 39100                        | 43450                        | 46950                        | 50400                        | 53900                        | 57350                        |
| PA    | Fayette County    | Pittsburgh, PA HUD Metro FMR Area               | 60000                                    | 33600        | 38400                       | 43200                        | 48000                        | 51850                        | 55700                        | 59500                        | 63350                        |

| State | County Name         | MSA Name  | median income family of 4 for 2008 | Veteran Only | Veteran Plus 1 Dependent | Veteran Plus 2 Dependents | Veteran Plus 3 Dependents | Veteran Plus 4 Dependents | Veteran Plus 5 Dependents | Veteran Plus 6 Dependents | Veteran Plus 7 Dependents |
|-------|---------------------|---|------------------------------------|--------------|--------------------------|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|---------------------------|
| PA    | Forest County       | Forest County, PA                                 | 4290                               | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Franklin County     | Franklin County, PA                               | 62100                              | 34800        | 39750                    | 44750                     | 49700                     | 53700                     | 57650                     | 61650                     | 65600                     |
| PA    | Fulton County       | Fulton County, PA                                 | 50500                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Greene County       | Greene County, PA                                 | 46300                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Huntingdon County   | Huntingdon County, PA                             | 49400                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Indiana County      | Indiana County, PA                                | 48200                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Jefferson County    | Jefferson County, PA                              | 45800                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Juniata County      | Juniata County, PA                                | 48800                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Lackawanna County   | Scranton-Wilkes-Barre, PA MSA                     | 54700                              | 30650        | 35000                    | 39400                     | 43750                     | 47250                     | 50750                     | 54250                     | 57750                     |
| PA    | Lancaster County    | Lancaster, PA MSA                                 | 64200                              | 35950        | 41100                    | 46200                     | 51350                     | 56450                     | 61550                     | 66650                     | 71750                     |
| PA    | Lawrence County     | Lawrence County, PA                               | 52400                              | 29350        | 33500                    | 37700                     | 41900                     | 46250                     | 50500                     | 54750                     | 59000                     |
| PA    | Lebanon County      | Lebanon, PA MSA                                   | 62500                              | 35000        | 40000                    | 45000                     | 50000                     | 54000                     | 58000                     | 62000                     | 66000                     |
| PA    | Lehigh County       | Allentown-Bethlehem-Easton, PA HUD Metro FMR Area | 65800                              | 36900        | 42150                    | 47450                     | 52700                     | 56900                     | 61150                     | 65350                     | 69550                     |
| PA    | Lucerne County      | Scranton-Wilkes-Barre, PA MSA                     | 54700                              | 30650        | 35000                    | 39400                     | 43750                     | 47250                     | 50750                     | 54250                     | 57750                     |
| PA    | Luzerne County      | Williamsport, PA MSA                              | 50500                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | McKean County       | McKean County, PA                                 | 50700                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Mercer County       | Sharon, PA HUD Metro FMR Area                     | 51700                              | 29200        | 33350                    | 37550                     | 41700                     | 45050                     | 48350                     | 51700                     | 55050                     |
| PA    | Mifflin County      | Mifflin County, PA                                | 47200                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Monroe County       | Monroe County, PA                                 | 63600                              | 35750        | 40850                    | 45950                     | 51050                     | 55150                     | 59200                     | 63300                     | 67400                     |
| PA    | Montgomery County   | Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA   | 74300                              | 41600        | 47550                    | 53500                     | 59450                     | 64200                     | 68950                     | 73700                     | 78450                     |
| PA    | Montour County      | Montour County, PA                                | 55700                              | 31200        | 35650                    | 40100                     | 44550                     | 48100                     | 51700                     | 55250                     | 58800                     |
| PA    | Northampton County  | Allentown-Bethlehem-Easton, PA HUD Metro FMR Area | 65800                              | 36900        | 42150                    | 47450                     | 52700                     | 56900                     | 61150                     | 65350                     | 69550                     |
| PA    | Northumberland      | Northumberland County, PA                         | 49000                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Perry County        | Harrisburg-Carlisle, PA MSA                       | 67500                              | 37800        | 43200                    | 48600                     | 54000                     | 58300                     | 62650                     | 66950                     | 71300                     |
| PA    | Philadelphia County | MD MSA  | 74300                              | 41600        | 47550                    | 53500                     | 59450                     | 64200                     | 68950                     | 73700                     | 78450                     |
| PA    | Pike County         | Pike County, PA HUD Metro FMR Area                | 61300                              | 38200        | 43650                    | 49100                     | 54550                     | 58900                     | 63300                     | 67650                     | 72000                     |
| PA    | Potter County       | Potter County, PA                                 | 48000                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Schuylkill County   | Schuylkill County, PA                             | 49500                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Snyder County       | Snyder County, PA                                 | 51500                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Somerset County     | Somerset County, PA                               | 45500                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Sullivan County     | Sullivan County, PA                               | 45600                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Susquehanna         | Susquehanna County, PA                            | 48700                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Tioga County        | Tioga County, PA                                  | 46600                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Union County        | Union County, PA                                  | 59000                              | 33050        | 37750                    | 42500                     | 47200                     | 51000                     | 54750                     | 58550                     | 62300                     |
| PA    | Venango County      | Venango County, PA                                | 48500                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Warren County       | Warren County, PA                                 | 52700                              | 29500        | 33700                    | 37950                     | 42150                     | 45500                     | 48900                     | 52250                     | 55650                     |
| PA    | Washington County   | Pittsburgh, PA HUD Metro FMR Area                 | 60000                              | 33600        | 38400                    | 43200                     | 48000                     | 51850                     | 55700                     | 59500                     | 63350                     |
| PA    | Wayne County        | Wayne County, PA                                  | 50400                              | 28850        | 32950                    | 37100                     | 41200                     | 44500                     | 47800                     | 51100                     | 54400                     |
| PA    | Westmoreland        | Pittsburgh, PA HUD Metro FMR Area                 | 60000                              | 33600        | 38400                    | 43200                     | 48000                     | 51850                     | 55700                     | 59500                     | 63350                     |
| PA    | Wyoming County      | Scranton-Wilkes-Barre, PA MSA                     | 54700                              | 30650        | 35000                    | 39400                     | 43750                     | 47250                     | 50750                     | 54250                     | 57750                     |
| PA    | York County         | York-Hanover, PA MSA                              | 65100                              | 36450        | 41700                    | 46900                     | 52100                     | 56250                     | 60450                     | 64600                     | 68750                     |