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Report to Congressional Committees

April 2010

VETERANS' DISABILITY BENEFITS

Expanded Oversight Would Improve Training for Experienced Claims Processors

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GAO-10-445

April 2010

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Highlights

Highlights of GAO-10-445, a report to congressional committees

VETERANS' DISABILITY BENEFITS

Expanded Oversight Would Improve Training for Experienced Claims Processors

Why GAO Did This Study

The Veterans' Benefits Improvement Act of 2008 (P.L. 110-389) mandated that GAO evaluate the Department of Veterans Affairs VA training for disability claims processors. This report answers the following two questions: (1) How appropriate is the training provided to experienced disability claims processors? (2) How adequate is the Veterans Benefits Administration's (VBA) monitoring and assessment of this training? To address these questions, GAO conducted a web-based survey of a nationally representative sample of claims processors, interviewed VBA headquarters and regional office officials, and reviewed VBA training material, relevant federal statutes, regulations, and court cases.

What GAO Recommends

GAO recommends that VBA (1) adopt procedures for routinely monitoring and ensuring compliance with annual training requirements, including more fully using its available electronic data to ensure that training requirements are met, (2) develop clear written guidance on the types of activities all regional offices should and should not count toward completion of annual training requirements, and (3) develop and implement a written strategy for routinely assessing the appropriateness of the training regional offices provide to experienced claims processors. In its comments, VA generally concurred with GAO's conclusions and concurred with all of GAO's recommendations.

View GAO-10-445 or key components.
For more information, contact Daniel Bertoni at (202) 512-7215 or bertonid@gao.gov.

What GAO Found

VBA's annual training requirements and the training received by experienced staff—those with more than two years experience—may not be appropriate, based on the results of GAO's survey of claims processors nationwide. Experienced claims processors had problems with five key areas: the number of hours of training required, the amount of training received on particular topics, the usefulness of some subject matter, the way training is delivered and the timing of training. GAO's survey results indicated that more than half (55 percent) of experienced claims processors found it difficult to meet VBA's 80-hour annual training requirement given their workload. In addition, based on its survey, GAO estimates that 45 percent of supervisors of experienced Rating Veterans Service Representatives (RVSR) and 53 percent of supervisors of experienced Veterans Service Representatives (VSR) thought that only some or few, if any, of the experienced staff they supervise need 80 hours of training to perform their job duties effectively. Many experienced staff also thought they received too little training on some topics and too much on others. For example, 42 percent thought they received less training than needed in how to rate claims involving special monthly compensation and 34 percent thought they received more than enough training on records management. Finally, opinions varied on how helpful the various modes of training were. Nearly all claims processors, in general, considered on-the-job experience to be the method of training best suited to their needs. An estimated 42 percent of all experienced claims processors, in general, felt that some of the training they received was delivered too late, suggesting that regional offices may not always deliver the training needed by experienced claims processors in a timely manner.

According to *Standards for Internal Control in the Federal Government*, federal agencies must have control mechanisms in place to help ensure that all employees receive appropriate and consistent training. Under its recently revised annual training requirements, VBA delegates considerable responsibility for training experienced claims processors to each of its 57 regional offices. In particular, regional offices are responsible for ensuring that claims processors complete annual training requirements. Each office also determines what topics are covered for half of the required training hours, what material to provide on each of these topics, and how and when the training should occur. Regional offices also have considerable discretion in determining what activities qualify as training. However, VBA lacks controls to ensure that regional offices deliver required training and record completed training in a consistent manner, and does little to assess the appropriateness or consistency of the training experienced claims processors receive.

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Abbreviations:

CTTR	Core Technical Training Requirements
LMS	Learning Management System
RVSR	Ratings Veterans Service Representatives
TBI	traumatic brain injury
TPSS	Training Performance Support System
VA	Department of Veterans Affairs
VBA	Veterans Benefits Administration
VSR	Veterans Service Representatives

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GAO
Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

April 30, 2010

The Honorable Daniel K. Akaka, Chairman
The Honorable Richard Burr, Ranking Member
Committee on Veterans' Affairs
United States Senate

The Honorable Robert Filner, Chairman
The Honorable Steve Buyer, Ranking Member
Committee on Veterans' Affairs
House of Representatives

For the past several years, the Veterans Benefits Administration (VBA) has experienced a growing inventory of claims for disability benefits. In addition, the Department of Veterans Affairs' (VA) Office of Inspector General recently identified serious issues with the consistency of claims decisions in these cases across regional offices.[1] To help VBA manage its increasing workload and replace the growing number of experienced claims processors who are retiring, Congress appropriated funds for VBA to hire more than 4,000 new staff since fiscal year 2005, including 1,200 to be hired through fiscal year 2010.

To ensure that decisions in disability compensation and pension cases are accurate, consistent, and timely, training for newly-hired claims processors must enable them to become fully proficient and training for experienced claims processors must help them maintain their knowledge and skills. In the Veterans' Benefits Improvement Act of 2008, Congress expressed its ongoing concerns in this area by mandating a GAO evaluation of VA training for disability claims processors.[2] In 2008 we reported that VBA's centralized training for new claims processors appeared well designed but that some claims processors had raised concerns about implementation.[3] VBA has since evaluated its training for

[1]VA, Office of Inspector General, *Audit of Veterans Benefits Administration Compensation Rating Accuracy and Consistency Reviews*, 08-02073-96 (Washington, D.C., Mar. 12, 2009).

[2]Pub. L. No. 110-389 § 225(b).

[3]See GAO, *Veterans Benefits: Increased Focus on Evaluation and Accountability Would Enhance Training and Performance Management for Claims Processors*, GAO-08-561 (Washington, D.C.: May 27, 2008).

new claims processors and made changes based upon that evaluation. In this report, we focus on training for experienced claims processors.[4] In response to the mandate, this report answers the following two questions: (1) How appropriate is the training provided to experienced disability claims processors? and (2) How adequate is VBA's monitoring and assessment of this training?

To address these questions, we conducted a Web-based survey in August and September 2009 of a nationally representative sample of VBA Veterans Service Representatives (VSR), Ratings VSRs (RVSR), and supervisory VSRs to obtain information about their training experiences and views.[5] Seventy percent of those sampled responded to the survey and the results were tested and determined to be generalizable to all claims processors.[6] We also interviewed VBA officials from VBA's Compensation and Pension Service and its Office of Employee Development and Training and obtained available documentation of VBA's procedures for identifying staff training needs and other written guidance. We spoke with managers and training coordinators in four regional offices—Little Rock, Arkansas; Denver, Colorado; St. Petersburg, Florida; and White River Junction, Vermont—chosen to reflect a range of office sizes and geographic locations. These offices do not represent all regional offices nationwide. We also asked Veterans' Service Organizations to provide their views on training for claims processors. To assess the adequacy of monitoring and evaluation, we applied criteria GAO has identified for assessing federal training programs and for assessing federal agency internal controls.[7] We also reviewed relevant federal statutes, regulations, and court decisions. Additional information on our survey methodology can be found in appendix I.

[4]While the focus is on experienced staff, we provide some descriptive information about new staff and some survey results for new staff for comparative purposes.

[5]For this review, we define experienced staff as those with 2 years or more of experience processing VA disability claims. New staff refers to staff with less than 2 years of experience.

[6]Unless otherwise indicated, the margin of error for estimates based on this survey cited are not greater than plus or minus 10 percentage points and differences reported between subgroups of claims processors are statistically significant.

[7]See GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, GAO-04-546G (Washington, D.C.: March 2004), and *Standards for Internal Control in the Federal Government*, GAO/AIMD-00-21.3.1 (Washington, D.C.: November 1999).

We conducted this performance audit from May 2009 to April 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

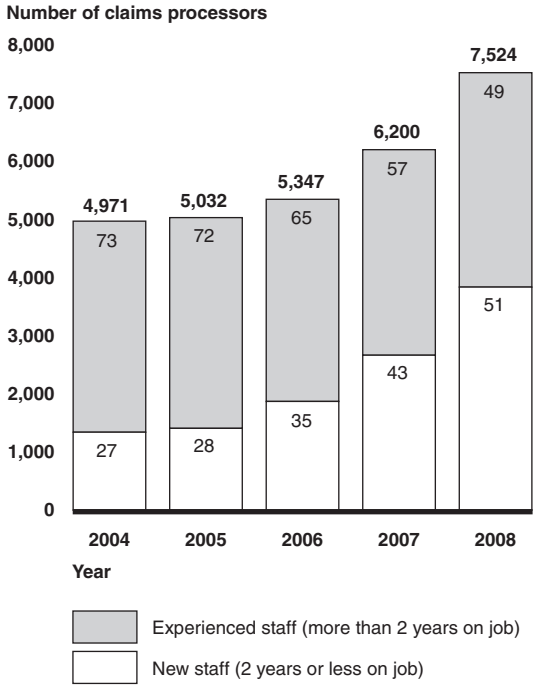
In 2009 the VBA employed 5,198 VSRs and 2,344 RVSRs[8]— also known as claims processors—that were most directly responsible for handling more than 975,000 veterans' claims for disability compensation and pension benefits at 57 regional offices.[9] VSRs perform nonrating tasks related to veterans' claims, and RVSRs assign ratings upon which benefit amounts are based. Since 2005, VBA has hired more than 4,000 new employees to help with its growing inventory of disability claims.[10] Consequently, the proportion of claims processors with 2 years or less of experience has nearly doubled from about one quarter of all claims processors in fiscal year 2004 to more than one half in 2008, the most current year for which full-year data were available (see fig. 1).

[8]VSRs and RVSRs were employed as of May 23, 2009. Supervisory VSRs were employed as of June 6, 2009.

[9]Disability compensation is a monthly cash payment to veterans who are disabled by an injury or illness incurred or aggravated during active military service. Payment amount is determined by the severity of the disability and the number of eligible dependents in each case. A disability pension is a monthly cash payment to low-income veterans who are permanently and totally disabled, or elderly, and meet certain minimum service requirements. Only veterans who are honorably discharged from the military can receive disability compensation or pension benefits. About 165,000—or 17 percent—of the estimated 975,000 disability claims VBA received in fiscal year 2009 were for disability pension benefits. The remainder was for disability compensation benefits.

[10]VBA's year-end pending inventory of claims has grown nearly 35 percent since 2005, from about 309,000 in fiscal year 2005 to about 416,000 in fiscal year 2009.

Figure 1: Number of Nonsupervisory VBA Claims Processors, by Experience, Fiscal Years 2004-2008



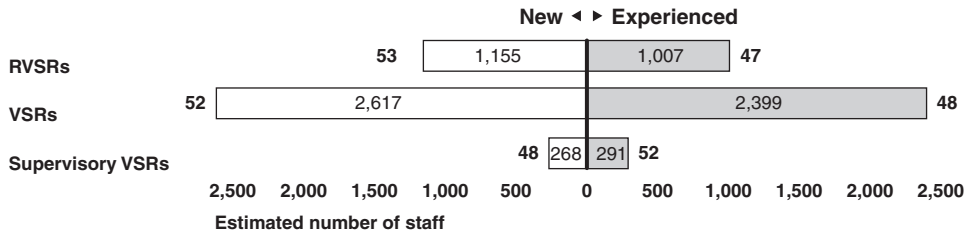
Source: VBA.

Note: The experience categories of more than 2 years and 2 years or less used in this figure differ slightly from the definitions of experienced (2 years or more) and new (less than 2 years) we used in this report.

Based on our survey of claims processing staff, we estimate that at the time of our survey,[11] about equal proportions of VSRs and RVSRs had less than 2 years of experience (see fig. 2).

[11]The survey was administered from August 12, 2009, through September 11, 2009 (see appendix I).

Figure 2: Estimated Percentages of New and Experienced VSRs, RVSRs, and Supervisory VSRs, as of May 2009



Source: GAO analysis of GAO survey data.

To process claims accurately, consistently, and in a timely manner, VSRs and RVSRs must perform a complex set of tasks well. When a claim is received, a VSR reviews it and assists the veteran in gathering the evidence, or documentation, needed to support it. Such evidence includes, but may not be limited to, a veteran's military service and discharge records, medical examination and treatment records, proof of income, and certificates of marriage and birth. An RVSR then evaluates the evidence to determine whether the claimant's medical condition(s) constitutes a disability, and its level of severity. The RVSR assigns a disability percentage rating to the medical condition(s), which is used to determine the amount of benefits the veteran is eligible to receive. A VSR calculates and authorizes, or obtains authorization for, the amount of monthly payments, including any retroactive payments to the claimant. VSRs and RVSRs may also perform follow-up reviews if, for example, there is evidence a claimant's medical condition has changed, or a court determines that a claimant was incorrectly denied benefits. To better manage the process, VBA's regional offices typically follow VBA's Claims Processing Improvement Model, which organizes claims processing duties into six phases and assigns a team of VSRs and RVSRs, as needed, to each phase. (See table 1.)

Table 1: Phases in VBA's Claims Processing Improvement Model and Responsible Teams

Claims processing phase	Responsible team
Establish the regional office's tracking procedures for all mail, as well as process claims that require only a brief review to determine eligibility.	Triage[a]
Develop evidence for disability ratings and prepare administrative decisions.	Predetermination[a]
Make decisions on claims that require consideration of medical evidence.	Rating[b]
Develop evidence for nonrating issues, processes benefit awards, and notify veterans of rating decisions.	Postdetermination[c]
Conduct personal interviews and handle telephone inquiries, including calls from veterans.	Public contact[c]
Handle requests for reconsideration of claims in which veterans have formally disagreed with claims decisions.	Appeals[a]

Source: GAO analysis of information provided by VBA, as cited in GAO-08-561.

[a]Team typically includes both VSRs and RVSRs.

[b]Team typically includes only RVSRs.

[c]Team typically includes only VSRs.

Although the Claims Processing Improvement Model narrows the range of tasks VSRs and RVSRs must perform at any given time, the practice in some offices of rotating staff among teams is, according to VBA, beneficial in helping VSRs and RVSRs reach journey-level, by giving them a broader range of skills and competencies to perform effectively. In addition to learning a variety of tasks specific to their team, claims processors must keep current with ongoing changes in regulations and laws governing veterans' benefits.

To ensure that VSRs and RVSRs develop and maintain the knowledge and skills needed to process disability claims accurately, consistently, and in a timely manner, VBA sets overall annual training requirements for claims processors and has developed the Challenge program for newly-hired or promoted claims processors.[12] Prior to January 2010, VBA had two annual training requirements for all VSRs and RVSRs intended to ensure they develop and maintain the knowledge and skills they need to perform well. First, VBA

[12]Challenge consists of a uniform curriculum that is implemented in three phases: initial orientation training provided at a participant's regional office; centralized classroom instruction typically delivered at VBA's Training Academy in Baltimore, Maryland; and comprehensive on-the-job and classroom training that new claims processors receive at their regional offices.

required that claims processors receive a total of 80 hours of training each year directly related to processing disability claims, regardless of their experience handling VA disability claims. Second, VBA required that

- 60 of the 80 hours cover topics each regional office selected from VBA's Core Technical Training Requirements (CTTR)—a list of training topics covering all aspects of the claims process—and
- 20 of the 80 hours cover topics determined by each regional office.

During the course of this review, VBA revised its annual training requirements for claims processors who had either completed the Challenge program or had been in their current position for more than 6 months. In a VBA document dated January 15, 2010, (see appendix IV) VBA notified VA regional offices and centers that beginning in fiscal year 2010, claims processors are required to receive 85 hours of training annually—80 in topics directly related to processing disability claims and an additional 5 hours in more general topics such as cyber security and ethics.

Under the new requirements, VBA continues to require staff to complete 80 hours of training in topics directly related to processing disability claims. However, VBA now requires that 40 of those hours be in topics selected by VBA, 20 cover topics selected by each regional office from the CTTR, and 20 cover topics determined by each regional office. VBA indicated that the requirement for 40 hours of training annually in VBA-designated topics would standardize half of the required training for all VSRs and RVSRs.[13] VBA is in the process of revising the CTTR and did not provide the complete, revised requirements for this review. VBA plans to provide regional offices with course materials for each VBA-designated topic tailored to the needs of claims processors with 6 months to 2 years experience, and to claims processors with more than 2 years of experience, which VBA refers to respectively as intermediate and journey level staff.[14]

[13]According to one VBA official, requiring all experienced claims processors to receive training in the same VBA-designated topics will better target training across regional offices to address problems in claims processing identified by headquarters' quality assurance procedures.

[14]VBA's newly instituted categories differ from those used in our analysis. For this review, we define new staff as those with less than 2 years in their current position, and experienced staff as those with 2 or more years in their current position.

In addition to its Challenge program and annual training requirements, VBA issues Fast Letters, conducts telephone conferences, and develops ad hoc required training on emerging issues to help ensure that disability claims processors have the information they need to do their job well. VBA's Fast Letters are periodic memoranda designed to quickly communicate policy changes as they occur and before formal training related to these changes can be developed. VBA issued 48 Fast Letters in 2008 and 52 in 2009 on topics ranging from cost-of-living adjustments in disability benefit amounts to rating the effects of traumatic brain injury. According to VBA officials, its monthly or quarterly telephone conferences with regional offices and centers concentrate on claims processing issues it identifies through its quality reviews or on topics such as new management priorities or initiatives that may affect how claims processors do their jobs. VBA officials also told us the agency periodically requires training on emerging topics such as rating post-traumatic stress disorder and spinal, neck, and joint injuries.

Experienced Claims Processors Had Concerns with Various Aspects of the Training They Received

VBA's annual training requirements and the training received by experienced staff may not be appropriate, based on the results of our survey of claims processors nationwide. Experienced claims processors had concerns in five key areas: the number of hours of training required, the amount of training received on particular topics, the helpfulness of some subject matter, the way training is delivered, and the timing of training.

Experienced Staff Expressed Concerns with the Amount of Training and Their Ability to Meet Current Training Requirements

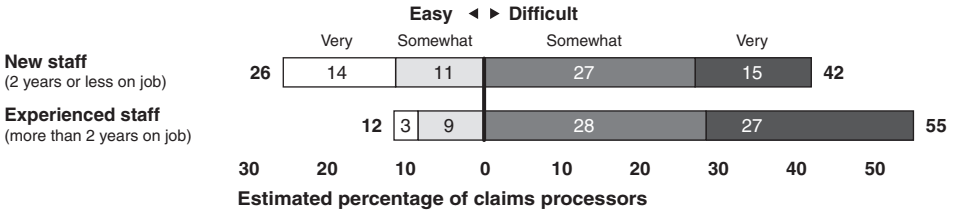
VBA currently requires all VSRs and RVSRs to complete 80 hours of training each year in topics directly related to disability claims processing.[15] Based on the results of our survey of claims processors, many believed that 80 training hours each year was not appropriate, particularly for experienced staff. An estimated 45 percent of supervisors of experienced RVSRs and 53 percent of supervisors of experienced VSRs thought that only some or few, if any, of the experienced staff they supervise need 80 hours of training. Most of the regional office officials we

[15]In January 2010, VBA officially added 5 hours to the 80-hour annual training requirement on topics such as cyber security and ethics that were already mandatory for disability claims processors.

interviewed also said 80 hours are too many for at least some experienced staff and one regional official told us it would make sense to vary the required number of hours based on the training needs of individual claims processors.[16] In 2008 we recommended that VBA collect and review feedback from staff to determine if the 80-hour training requirement was appropriate for all VSRs and RVSRs. VBA has not yet taken steps to implement this recommendation.

Our survey results also indicated that more than half of experienced claims processors found it somewhat or very difficult, in general, to meet the 80-hour annual training requirement, given their workload, and that experienced staff found it more difficult than new staff (see fig. 3). Moreover, a large proportion of those who supervised experienced claims processors agreed. Sixty-one percent of experienced RVSR's supervisors and 76 percent of experienced VSR's supervisors thought it was somewhat or very difficult for experienced staff to complete 80 hours of training each year.

Figure 3: Claims Processors' Views on the Ease or Difficulty of Completing 80 Hours of Training Each Year



Source: GAO analysis of GAO survey data.

While many new staff also found it somewhat or very difficult to meet this requirement, one VBA official told us it is easier for them to do so because they typically receive far more than 80 hours each year through Challenge training, which is targeted exclusively to newly hired and promoted staff and can take more than a year to complete.

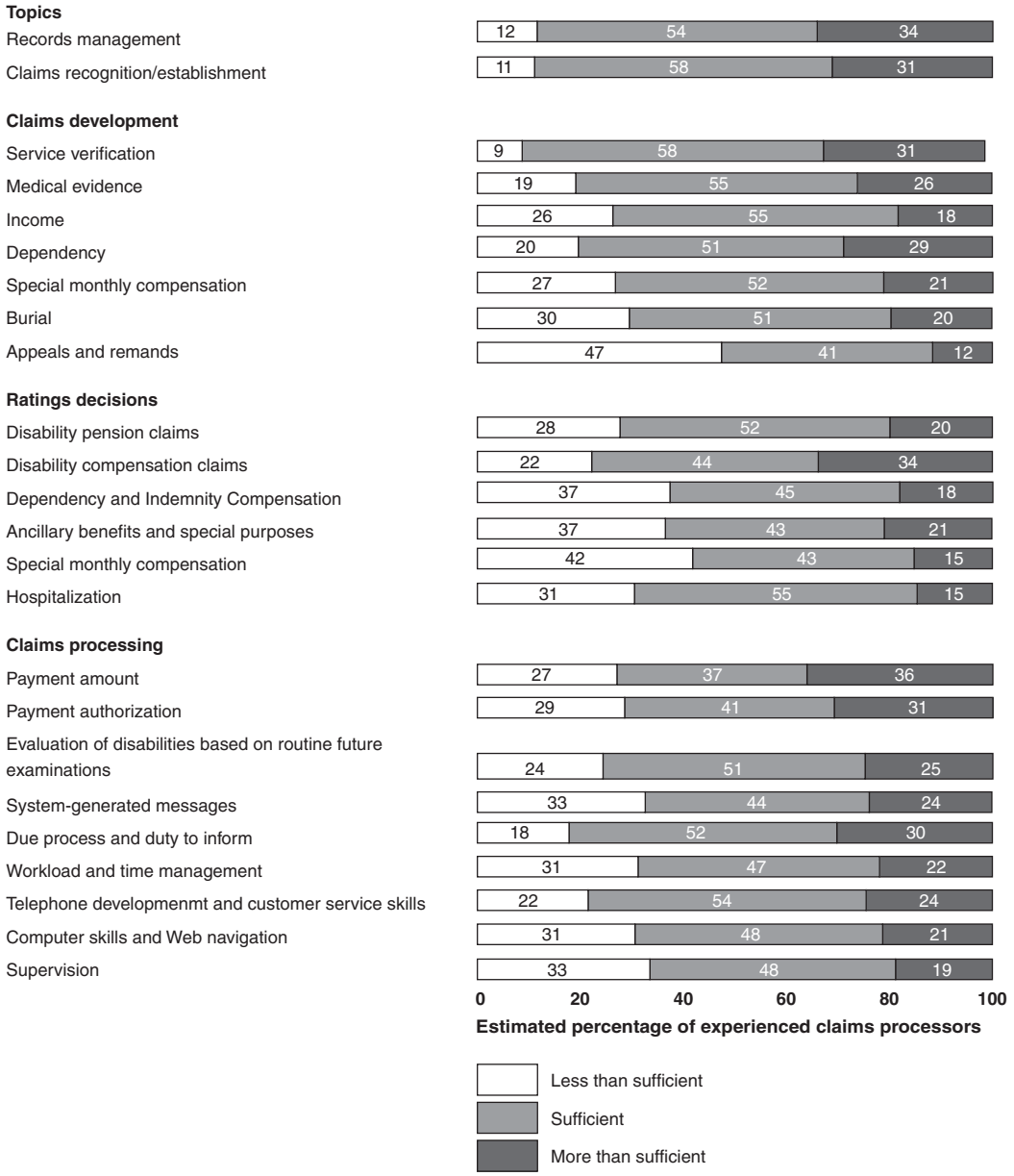
[16]An 80-hour annual training requirement may be appropriate for some, in particular new, staff. An estimated 70 percent of all supervisors of new RVSRs and 62 percent of supervisors of new VSRs thought that all or almost all of the new staff they supervise needed 80 hours of training.

Many Experienced Staff Thought They Did not Receive the Right Amount of Training in Some Topics

Our survey results indicated many experienced claims processors felt they received too little training on some topics and too much on others (see fig. 4). Specifically, nearly half (47 percent) of all experienced claims processors, in general, thought they received less than sufficient training in developing appeals and remands. An estimated 42 percent thought they received less training than needed in how to rate claims involving special monthly compensation and 37 percent thought they received less training than needed in Dependency and Indemnity Compensation.[17] Conversely, more than one-third of all experienced claims processors thought they received more than enough training in records management (34 percent), rating disability compensation claims (34 percent), and calculating payment amounts based on disability ratings (36 percent).

[17]The Dependency and Indemnity Compensation program is for survivors of veterans whose deaths occurred on active duty, are service-connected, or follow from a period of permanent and total service-connected disability.

Figure 4: Experienced Claims Processors' Views Regarding Sufficiency of Training on Different Topics



Source: GAO analysis of GAO survey data.

Note: Some totals do not add to 100 percent due to rounding.

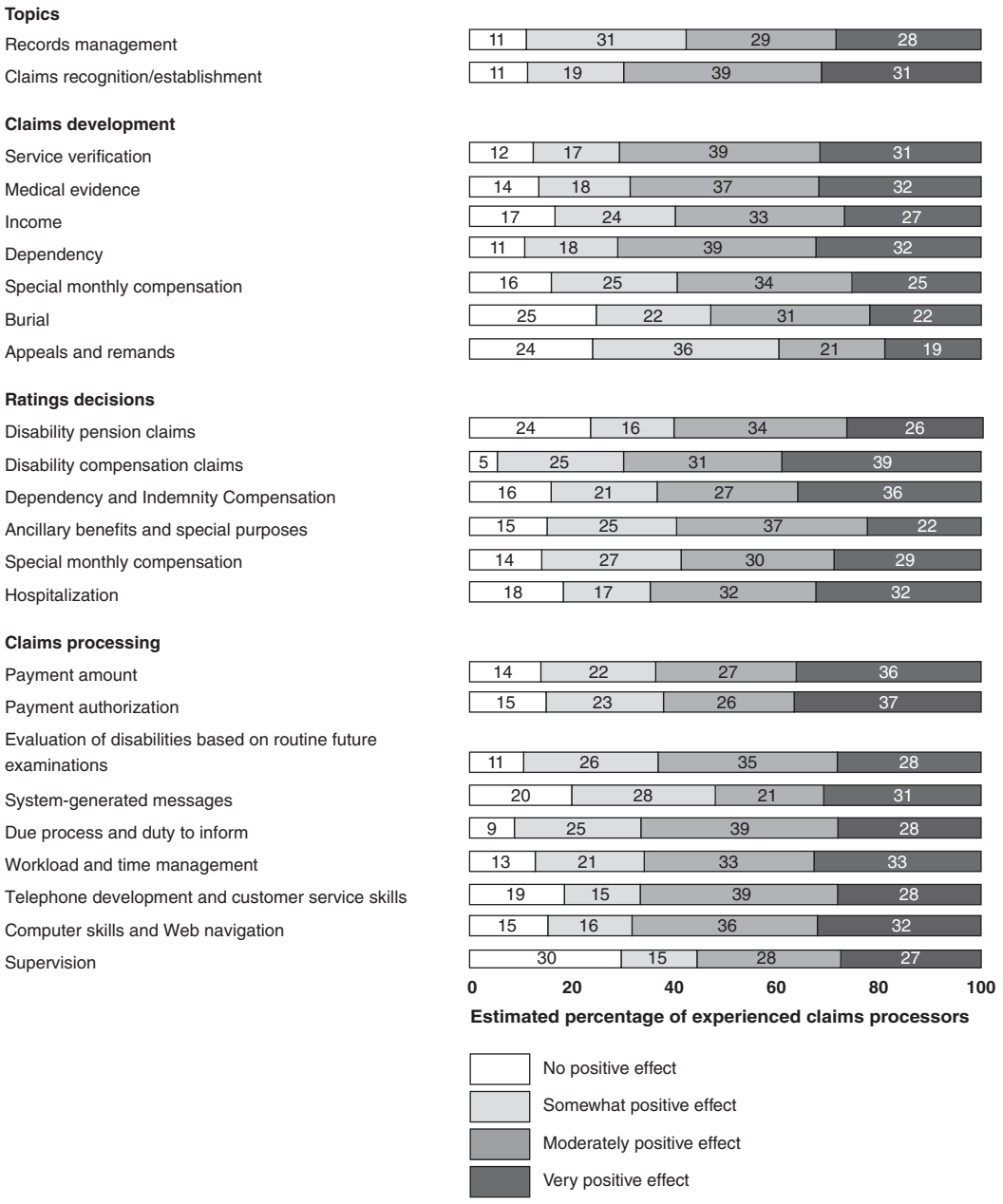
Some claims processors wanted more training on topics outside of their official job duties. For example, a higher percentage of VSRs (67 percent) than RVSRs (28 percent) indicated they did not receive sufficient training

in developing appeals and remands and more than half of all VSRs felt that they received an insufficient amount of training on rating decisions involving ancillary benefits, even though VSRs do not usually process appeals and remands or make ratings determinations. One VBA official told us that some VSRs try to prepare for promotion by taking training in tasks RVSRs usually perform. In addition, some regional offices may rotate claims processors from one team to another to help manage workloads, so VSRs may feel the need to cross train and develop skills that are not typically required of people on their assigned team.

Experienced Staff Had Mixed Views on How Much Their Training Helped Them Do Their Job

Based on our survey results, experienced staff thought training on some topics had a moderate to very positive effect on their ability to do their jobs while training on other topics had only somewhat or no positive effect. For example, 70 percent thought that training on how to rate disability compensation claims had a moderate or very positive effect on their ability to do their job (see fig. 5). Similarly, about 70 percent thought that claims development training on service verification had a moderate or very positive effect on their ability to do their job. On the other hand, 48 percent of all experienced claims processors felt training on responding to system generated messages had no or only some positive effect on their ability to do their jobs. Also, about 44 percent of experienced claims processors felt courses on supervision had no or only some positive effect on their job performance. Experienced claims processors, in general, assessed training on specific medical conditions, such as post-traumatic stress disorder and spinal, neck, and joint injuries favorably (see fig. 6).

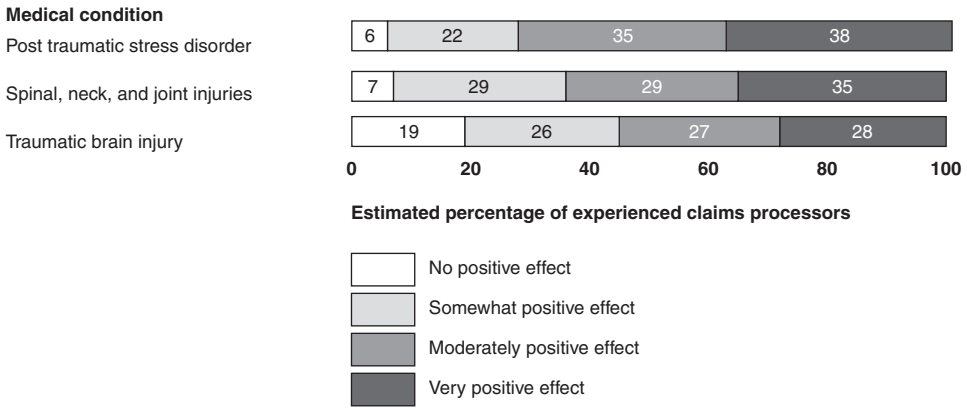
Figure 5: Experienced Claims Processors' Views Regarding the Effect of Formal Training on Their Ability to Do Their Job, by Training Topic



Source: GAO analysis of GAO survey data.

Note: Due to rounding, the percent total is slightly lower than the actual total of 71 percent and slightly higher than the actual total of 44 percent.

Figure 6: Experienced Claims Processors' Views Regarding the Effect of Training about Specific Medical Conditions on Their Ability to Do Their Job



Source: GAO analysis of GAO survey data.

Note: Some totals do not add to 100 percent due to rounding.

One possible explanation for experienced claims processors' negative views regarding the effect of training in some topics may be that the training they receive covers information they already know or tasks they have already mastered.[18] In discussing training needs with us, two of the four regional training managers we spoke with said training for experienced staff should be more advanced. Another told us that refresher training does not address complex issues experienced on the job and resembles basic or remedial training.

While an estimated 72 percent of all experienced claims processors felt most or almost all of their instructors deserved high marks for subject matter knowledge, about half believed instructors lacked effective teaching skills. Moreover, based on our survey an estimated 2,373 claims, processors taught at least one course between August 2008 and September 2009, but VBA provided or paid for instructor training for only one in four of them.

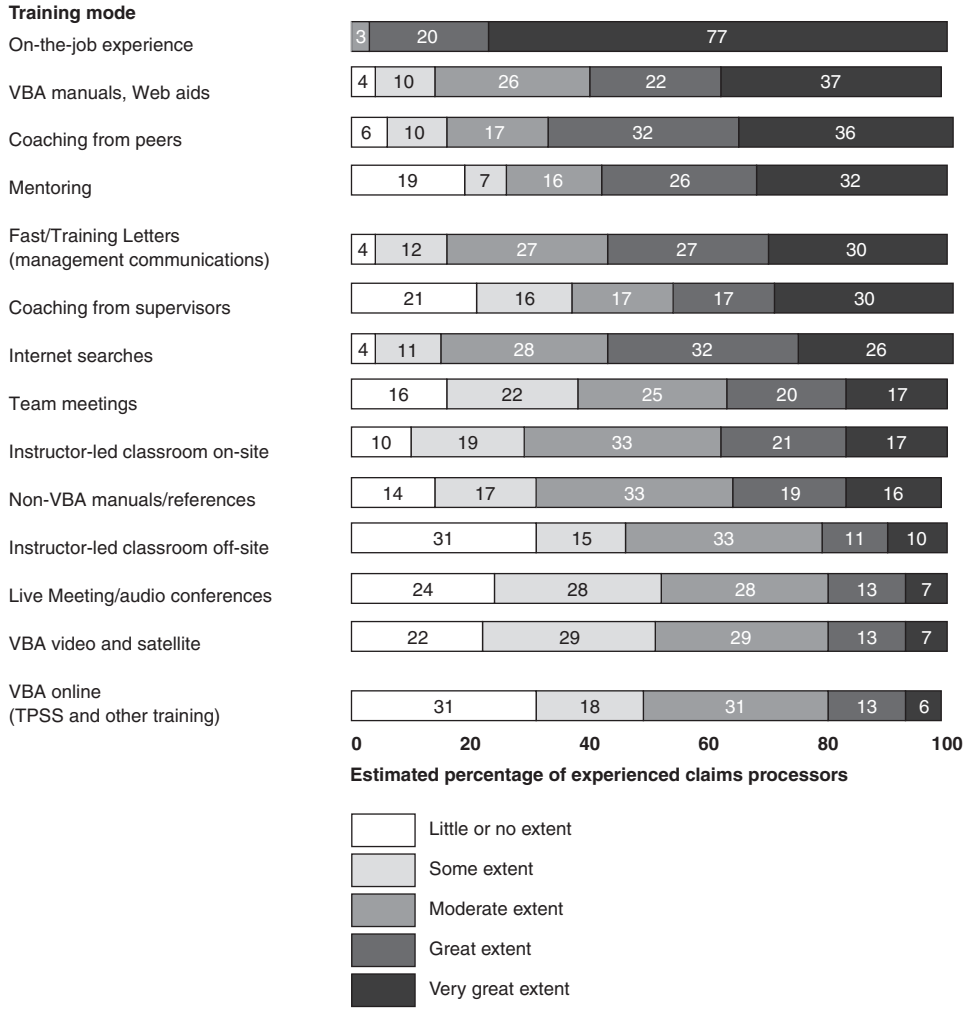
[18]This is consistent with staff views we reported in our previous report in this area. At that time staff at three regional offices said the training topics set by the Compensation and Pension Service are designed for new staff and do not change much from year to year, so experienced staff end up repeating courses. See GAO-08-561, p. 21.

Opinions of Experienced Staff Varied on the Helpfulness of Various Training Modes and On the Timeliness of Training

Training for disability claims processors can be delivered in a number of ways: formal classroom training, online instruction, video or satellite conferences, and other instructor-led training. Disability claims processors can access online training courses through VBA's Training Performance Support System (TPSS). More learning resources may also be used, such as VBA training materials, published guidance, and technical information available on VBA's internal Web site. Regional offices also provide individual coaching and mentoring, and may hold weekly meetings for claims processing teams.

While regional offices and VBA can deliver training for claims processors in a number of ways, based on our survey results, experienced claims processors, in general, found certain training modes and learning resources more helpful than others (see fig. 7). Nearly all experienced staff thought that on-the-job experience, to a great or very great extent, helped them learn what they needed to know to perform their jobs. Although most experienced staff found this learning method helpful, it would be unreasonable to expect them to remain proficient at their jobs without the benefit of at least some periodic, formal training. However, relatively fewer experienced claims processors view VBA's more formal training modes to be helpful. In particular, TPSS or other online training and video or satellite training appeared to be least helpful to experienced claims processors, even though most had received such training. Less than 20 percent said this training had, to a great extent, helped them become familiar with even the basic information needed to handle claims.

Figure 7: Experienced Claims Processors' Views on the Extent to Which Various Training Modes Helped Them Learn What They Needed to Know to Perform Their Jobs



Source: GAO analysis of GAO survey data.

Note: Some totals do not add to 100 percent due to rounding.

Survey results also indicate that regional offices may not deliver the training needed by experienced claims processors in a timely manner. An estimated 42 percent of all experienced claims processors, in general, felt that at least some of the training they received was delivered too late. For example, although the regulation governing ratings decisions on the effects of traumatic brain injury (TBI) was changed in October 2008, one RVSR wrote in a comment that, "TBI training is not projected to come out

until [2010.]"[19] Another claims processor wrote that introductory leadership training was not received until 2 years after that claims processor was promoted to a supervisory position.

VBA Does Little to Systematically Monitor or Assess Training for Experienced Claims Processors

According to *Standards for Internal Control in the Federal Government*,[20] federal agencies must have mechanisms in place to help ensure that all employees receive appropriate training. Under its recently revised annual training requirements, VBA delegates considerable responsibility for training experienced claims processors to each of its 57 regional offices. Regional offices are responsible for ensuring that claims processors complete annual training requirements. Each office also determines what topics are covered for half of the required hours, what material to provide on each of these topics, and how and when the training should occur. VBA does little, however, to ensure that regional offices actually provide the required training or to assess the appropriateness and consistency of the training experienced claims processors receive.

VBA Does Not Systematically Monitor Regional Office Compliance with its Annual Training Requirements

It is important for federal agencies to have mechanisms in place to ensure their employees actually receive required training. According to our prior report on assessing employee training in federal agencies,[21] tracking the actual receipt of required training calls for reliable data from a comprehensive learning management system. Currently, VBA headquarters does not ensure that all experienced claims processors across all regional offices receive the number of hours and types of training required each year. Each regional office is responsible for recording completed training hours for each claims processor in VA's Learning Management System (LMS)—a Web-based application intended to provide a single access point that all VA managers and employees can use. VBA used LMS data in fiscal year 2009 to determine the total number and percentage of VSRs and RVSRs at each regional office who had met the annual training requirement, and used it once in fiscal year 2010 to determine if VSRs and RVSRs were on track to meet their fiscal year 2010 training requirements. These data show that only one regional office met the 80-hour requirement for VSRs and RVSRs in fiscal year 2009, and in nine regional offices, fewer

[19] A presentation on TBI was available on VBA's intranet site.

[20] GAO/AIMD-00-21.3.1.

[21] GAO-04-546G.

than half of VSRs and RVSRs had met the requirement. In addition, VBA officials told us that VBA headquarters does not use it at this time to centrally monitor the specific types of training individual claims processors have completed. In our survey we found that some claims processors did not receive training they should have. Based on our survey results, an estimated 24 percent of all RVSRs with more than 1 year of experience, who should have received mandatory training on rating spinal, neck, and joint injuries, never did.[22] This evidence, together with VBA's data indicating that regional offices are not meeting the 80-hour requirement, underscore the importance of VBA's monitoring of training for claims processors.

In addition to not using LMS to centrally monitor receipt of required training, VBA lacks controls to ensure that regional offices all record completed training in a consistent manner. Each regional office has considerable discretion in determining what activities qualify as training. In our interviews with regional office management, we found evidence that they were not all defining training consistently. For example, some regions counted time claims processors spent reading Fast Letters as training. Others did not. This raises questions about the reliability of the data that regional offices enter into the LMS.

VBA Does Not Systematically Assess the Appropriateness or Consistency of Training Regional Offices Provide to Experienced Claims Processors

It is also important for federal agencies to have mechanisms in place to ensure that training for employees is appropriate and consistent. According to our prior report on training for federal employees,[23] agencies should assess the appropriateness and consistency of the training employees receive. However, VBA does little to determine if all regional offices provide training that is consistent or appropriate for experienced claims processors—that is, (1) covers topics relevant to what they do, (2) helps them do their job, (3) is delivered in the most useful and efficient way, and (4) is provided when needed.

[22]This training, delivered in September 2008, was undertaken to clarify requirements resulting from *DeLuca v. Brown*, 8 Vet. App. 202 (1995), in which the court held that under federal regulations defining joint and spine impairment severity in terms of limits on range of motion, VA claims adjudicators must consider whether range of motion is further limited by factors such as pain and fatigue during "flare-ups" or following repetitive use of the impaired joint or spine.

[23]GAO-04-546G.

In the past, VBA has evaluated some mandatory training for RVSRs, assessed training for newly-hired claims processors, and solicited feedback on TPSS. VBA provided training for RVSRs in response to a study conducted by VBA headquarters in July 2008 that found large differences in disability ratings for lower back conditions across regional offices.[24] After the training was provided, VBA conducted a follow-up study in April 2009 and found consistency in ratings across regional offices improved from 69 percent to 82 percent. In June 2008, VBA completed an evaluation of its Challenge training for new staff to determine if the training as implemented, provided value to VBA, and to help identify possible improvements. The study included (1) face-to-face interviews with 183 VBA employees including managers, supervisors, instructors, VSRs, RVSRs, and trainers at 16 regional offices; (2) an online survey of VSRs, RVSRs, coaches, and training coordinators at VBA's 57 regional offices: and (3) observations of Challenge training at 6 locations. It identified a number of areas for improvement, and VBA officials said changes were made based on the findings and recommendations. Finally, in June 2009, VBA conducted a satisfaction survey of online TPSS training provided to new staff as part of Challenge training. According to VBA officials, about 75 percent of respondents rated the quality of TPSS training good to excellent and felt TPSS was satisfying to use.[25]

Feedback from training participants, as well as supervisors, instructors, and other stakeholders, can provide valuable information agencies can use to assess the appropriateness and consistency of training for employees. In the past, however, VBA has not systematically collected feedback from experienced claims processors on training received at the regional offices. VBA has recently developed a training evaluation tool for claims processors. This tool is linked to VBA's internal Web site and, as of March 1, 2010, all VSRs and RVSRs are required to use the tool to evaluate their CTTR courses; however the tool will not be used to evaluate non-CTTR training provided by the regional offices.

[24]VBA began conducting inter-rater reliability studies in 2008 to assess how consistent raters from all regional offices are on eligibility determinations on specific types of disabilities. A sample is selected from RVSRs and decision review officers from all regional offices.

[25]Our survey found that about 65 percent of staff found TPSS somewhat to very easy to use. However, only 21 percent said that TPSS helped them, to a great or very great extent, become familiar with basic information needed to handle claims.

VBA officials told us that teams from VBA headquarters periodically visit regional offices to monitor their compliance with VBA policies and procedures. Since July 2009, such visits have included a training specialist who is responsible for reviewing some aspects of training in the regional office, such as LMS training records, training materials, and whether new claims processors have completed the last phase of Challenge training at their regional office. The training specialist also discusses training with the regional office training manager and coaches. Although examining some aspects of training for claims processors during these visits may provide VBA with some information on the appropriateness and consistency of training provided in a given regional office, each office is only visited about once every 3 years.

Conclusions

VBA claims processors perform a vital role in helping the nation serve the needs of disabled veterans. Through its training program, VBA strives to provide the necessary tools to enable claims processors to perform this role well; however, VBA needs to do more to monitor and evaluate its training for experienced claims processors. Even though VBA devotes significant staff resources to training, it does not sufficiently monitor compliance with the training requirements and therefore cannot be sure that all staff are receiving the type of training that VBA believes is essential for success on the job. Although VA's automated LMS data system should play a key role in monitoring the training received by staff, VBA does not fully use this system for this purpose. Furthermore, there are questions about the reliability of the training data regional offices record in this system.

VBA has invested considerable resources evaluating and refining Challenge training for new claims processors. According to our survey, however, both experienced claims processors and their supervisors have a number of concerns regarding the training that experienced claims processors receive. VBA has recently taken steps to standardize some of the topics that experienced claims processors are required to train in, which may address some of the concerns raised in our survey. However, without a strategy for routinely assessing the appropriateness and consistency of the training provided to experienced claims processors—such as the number of hours required, the relevance of VBA-designated training topics, the manner in which training is delivered, and its timing—VBA cannot ensure the effectiveness of its training.

Recommendations for Executive Action

We recommend that the Secretary of Veterans Affairs direct the Undersecretary for Benefits to take the following three actions:

1. To ensure that claims processors receive the types of training required by VBA each year, VBA should adopt procedures for routinely monitoring and ensuring compliance with annual training requirements, including more fully using its LMS to ensure that claims processors receive required CTTR and ad hoc training on emerging topics.

2. To ensure that regional offices record training activities consistently in the LMS so that LMS data are reliable, VBA should develop clear written guidance on the types of activities all regional offices should and should not count toward completion of annual training requirements.

3. To ensure that training is appropriate for experienced claims processors, VBA should develop and implement a written strategy for systematically assessing the content, mode and timing of training experienced claims processors receive in regional offices and make improvements, when indicated. Such a strategy should include a standardized approach for

   - obtaining and analyzing feedback from experienced claims processors on the appropriateness of non-CTTR training provided by regional offices and

   - obtaining input from all regional office managers and training coordinators on the appropriateness of CTTR course content.

Agency Comments and Our Evaluation

We provided a draft of this report for review and comment. In its comments, VA generally agreed with our conclusions and concurred with all of our recommendations. In response to our recommendation that VBA should adopt procedures for routinely monitoring and ensuring compliance with annual training requirements, VA highlighted the steps that it now takes to monitor compliance and noted that VBA considers this recommendation to be fully implemented. However, our recommendation is aimed at ensuring that claims processors receive not only the amount of training required, but also the types of training required. It is not clear that VBA's current processes will address both. VA also provided technical comments that were incorporated into this report as appropriate.

We are sending copies of this report to the relevant congressional committees, the Secretary of Veterans Affairs, and other interested parties. The report is also available at no charge on GAO's Web site at http:/www.gao.gov.

If you or your staffs have any questions concerning this report, please contact me at (202) 512-7215 or bertonid@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Staff members who made key contributions to this report are listed in appendix V.

Daniel Bertoni
Director, Education, Workforce,
and Income Security Issues

Appendix I: Survey Methodology

To obtain information about the training Veterans Benefits Administration (VBA) disability compensation and pension claims processors, in general, received in the 12 months preceding August 2009 and their views on the amount, content, helpfulness, mode, and timeliness of this training, we conducted a Web-based survey of a nationally representative sample of these claims processors from June through August 2009. Our survey methodology is described in detail below.

Questionnaire Development and Administration

We developed survey questions with input from officials from the VBA Compensation and Pension Service and Office of Employee Development and Training. We pretested versions of the draft questionnaire with a total of 15 claims processors in a variety of positions in VBA's Wilmington, Delaware, and Philadelphia, Pennsylvania, regional offices and revised the questionnaire based on their comments. Once the questionnaire was finalized, sampled claims processors were sent an email asking them to complete the questionnaire. It was available to them over the Web from August 12, 2009, to September 11, 2009. To ensure a high response rate, we e-mailed follow-up requests to nonrespondents approximately 2 and 4 weeks after the initial email.

Population and Sample Design

Our population for this survey consisted of 8,119 disability compensation and pension claims processors that were employed by the agency as of May and June 2009.[1] VBA provided us with lists of these claims processors that we divided into three strata based on their position:

- Veterans Service Representatives (VSR),
- Rating Veterans Service Representatives (RVSR), and
- Supervisory VSRs.

We drew an independent random sample from each of these strata to enable us to project survey results to all VBA claims processors, in general, and to claims processors in each position listed above.[2] Table 2

[1]Veterans Service Representatives (VSRs) and Rating Veterans Service Representatives were employed as of May 23, 2009. Supervisory VSRs were employed as of June 6, 2009.

[2]We over sampled from each stratum to take into account sampled claims processors who might have been incorrectly included in the original population and sampled claims processors who would not respond to the survey.

shows the size of each population, the size of the sample drawn from each, and the number of claims processors in each stratum that responded to the survey. Of our total sample of 595 claims processors, 414 responded to the survey for an overall response rate of 70 percent.

Table 2: Population, Sample, and Respondents by Stratum

Claims processor group	Population size	Sample size	Number of respondents
VSR	5,198	209	143
RVSR	2,344	204	142
Supervisory VSR	577	182	129
Total	**8,119**	**595**	**414**

Source: Analysis GAO survey data and information provided by VBA.

Estimation, Sampling, and Nonsampling Error

To produce estimates regarding the experiences and views of claims processors, in general, from survey responses from a sample of claims processors, we weighted each response from claims processors in each stratum to statistically account for all members of that stratum. Because estimates are based on responses from a sample, each estimate we report has a measurable precision or sampling error. The sampling error or margin of error surrounding an estimate is expressed as a number of percentage points higher or lower than that estimate and the entire range the sampling error covers is referred to as a confidence interval. Sampling errors are calculated based on a certain confidence level. Sampling errors for estimates we report from this survey are based on a confidence level of 95 percent and are calculated using methods appropriate for a stratified random sample. Unless otherwise indicated, sampling errors for estimates in this report are never greater than plus or minus 10 percentage points. At a 95 percent confidence level, this means that in 95 out of 100 instances the sampling procedures we used would produce a confidence interval (in this case, a 20 percentage point range) containing the true population value we estimate.

In addition to sampling error, estimates based on survey results are subject to what is referred to as nonsampling error that can result from, among other things, poorly designed survey questions and mistakes in data entry or analysis. We took a number of steps in developing the questionnaire and in entering and analyzing the data to minimize nonsampling error. For example, a social science survey specialist collaborated with GAO subject matter experts in designing the questionnaire, it was reviewed by three high level VBA officials and, as

noted above, it was pretested with a number of different types of claims processors in two locations. In addition, when we analyzed the data, an independent analyst verified all computer programs. Because this was a Web-based survey, respondents' answers to survey questions were automatically entered into an electronic file, eliminating the need to separately key responses into a data file, further minimizing the potential for nonsampling error.

Appendix II: Training Topics Included in GAO's Survey of VBA Claims Processors

The following is a list of potential training topics for VBA claims processors which we used to solicit information about the content of training provided in our survey of VSRs, RVSRs, and supervisory RVSRs. We based this list on VBA's *Fiscal Year 2008 Core Technical Training Requirements*, VBA's Challenge Training Curriculum for new staff, feedback received from VBA field staff during survey pretests, and comments from officials representing VBA's Compensation and Pension Service and Office of Employee Development and Training.

Table 3: Training Topics Included in GAO's Survey of VBA Claims Processors

Training topic	Related claims processing task
Records management	Maintaining both physical claims folders and electronic files.
Claims recognition/ claims establishment	Reading through a veteran's narrative, identifying issues relevant for particular types of claims, and establishing a computer record for the veteran's inquiry.
Claims development: service verification	Searching various databases for evidence of the claimant's military service in order to determine both the character of service and military service dates.
Claims development: medical evidence	Ensuring that there is sufficient medical evidence for the ratings team to issue a rating regarding a veteran's medical condition.
Claims development: income	Determining whether the veteran meets the income thresholds for eligibility for benefits.
Claims development: dependency	Locating information on the claimant's relationship and dependency, such as marital status and dissolution of prior marriages, and parental relationships and child dependency.
Claims development: special monthly compensation	Determining claimants' eligibility for special monthly compensation, based on whether the veteran has suffered additional disability as a result of a service-connected disability or needs special assistance.
Claims development: burial	Determining whether veterans are eligible for burial benefits under certain conditions, such as their disability occurred while in the line of duty.
Claims development: appeals and remands	Sending a case back for more work or additional development is called a "remand." An appeal is a request for a review of a Department of Veterans Affairs (VA) determination on a claim for benefits issued by a local VA office.
Ratings decisions: disability pension claims	Determining if a veteran who claims pension benefits served in a period of war, is permanently and totally disabled for reasons not service-connected, and meets the income thresholds for eligibility.
Ratings decisions: disability compensation claims	Evaluating claimed disabilities and assigning ratings based on degree of disability.
Ratings decisions: dependency and indemnity compensation, and accrued benefits	Determining whether claimants are eligible for the Dependency and Indemnity Compensation program, which is only for survivors of veterans whose deaths occurred while on active duty, are service-connected, or follow from a period of permanent and total service-connected disability.
Ratings decisions: ancillary benefits and special purposes	Determining whether claimants are eligible for ancillary benefits, which might include automobile and adaptive equipment allowances, special housing adaptation grants, and a clothing allowance.
Ratings decisions: special monthly compensation	Determining entitlement to special monthly compensation is based on medical evidence, which raters must evaluate.

Training topic	Related claims processing task
Ratings decisions: total disability due to hospitalization or convalescence	Issuing a temporary rating when a veteran experiences a prolonged hospitalization or convalescence.
Claims processing: payment amount	Determining the amount of a basic monthly payment based on the percentage on the veteran's disability.
Claims processing: payment authorization	Authorizing the amount of the benefit based on veteran's disability.
Evaluation of disabilities based on routine future examinations	Requesting medical re-examinations in order to verify either the continued existence or the current severity of a disability.
System-generated messages (write-outs)	Processing computer-generated error message that alert VA regional offices to complete actions that ensure the accuracy of compensation payments and case tracking information.
Due process and duty to inform	Assisting veterans, as required by law, by providing due process and informing them of how to develop well-grounded claims, and when relevant records cannot be located.
Workload and time management	Accurately processing claims while meeting daily productivity and annual training requirements.
Telephone development and customer service skills	Interacting in a professional manner with the public via telephone or directly at Veterans Service Centers.
Computer skills and Web navigation	Operating various computer programs, such as the Benefits Delivery Network and MAP-D (Modern Award Processing Development), which are unique to VA, and navigating the Internet.
Supervision	Developing staff, maintaining team morale, and assigning and reviewing the work of other claims processors, as assigned.

Source: GAO analysis of information provided by VBA and GAO survey questionnaire.

Appendix III: VBA Fast Letter 10-05, Revision of Core Technical Training Requirement Hours for VSRs and RVSRs

DEPARTMENT OF VETERANS AFFAIRS
Veterans Benefits Administration
Washington, D.C. 20420

January 15, 2010

Director (00/21)
All VA Regional Offices and Centers

Fast Letter 10-05

SUBJ: Revision of Core Technical Training Requirement (CTTR) Hours for Veterans Service Representatives (VSRs) and Rating Veterans Service Representatives (RVSRs).

Purpose

There is a critical need to ensure national training efforts are consistent and aligned with VA's organizational goals. Veterans Benefits Administration (VBA) field offices provide specific employee training which enhances delivery of quality service to Veterans. Each office is responsible for establishing training plans at the beginning of every fiscal year and for ensuring employees complete the designated number of Core Technical Training Requirement (CTTR) hours. The C&P Training Staff has been working with the Systematic Technical Accuracy Review (STAR) Quality Staff to use STAR findings to develop a standardized national training agenda. The result is an 85-hour curriculum, specific to level of experience, for VSRs and RVSRs. This curriculum includes mandatory technical training courses, while allowing flexibility for local office needs.

Background

Technical training is content that is directly related to an employee's function in the organization. Each position in the VBA has technical training requirements; however, this document addresses the FY 2010 training hour requirements for only the VSR and RVSR positions.

Procedure

Both the VSR and RVSR positions are highly standardized positions, and as RVSR or VSR experience levels increase, their ability and knowledge also increases. Because of the varying level of knowledge expected at each of the skill levels, experience level-specific training, has been developed. This training is identified as follows: Entry Level – in position less than 6 months; Intermediate Level – in position 6 to 24 months; and Journey Level – in position over 24 months.

Page 2.

Director (00/21)

Beginning in FY 2010, all VSRs and RVSRs who have completed the Challenge curriculum and/or have more than six months in their job positions will be required to complete a minimum of 85 hours of technical training. The C&P Training Staff will make available specific training materials for 40 hours of mandatory technical training. This will standardize at least half of the required training for all VSRs and RVSRs. An additional 20 hours of technical training must be selected from the standardized instructional content available on the C&P Training website. The remaining 25 hours will be reserved for station-determined issues/topics. VA mandatory training, such as Cyber Security and Ethics, will count as part of the 25 hours of locally directed training.

The mandatory training topics along with the associated training materials are being posted on the C&P Training Website as they are completed. Topics and materials for the entire 85 hours of the curriculum will be available by the end of January 2010.

The CTTR courses will be entered as items in the VA-Learning Management System (LMS). The LMS will be updated as additional training materials are developed and released to the field. The revised CTTR will reflect the appropriate curriculum based on two skill levels (Intermediate Level and Journey Level) for both the VSR and RVSR positions.

The C&P Service is working with ED&T to develop a mandatory course evaluation protocol for CTTR training. In the near future this evaluation protocol will be incorporated into the CTTR training program for the purpose of ensuring CTTR compliance and evaluating the effectiveness and quality of the standardized training curriculum. Additional guidance will be provided once the mandatory course evaluation protocol is ready for deployment.

Questions

E-mail questions concerning this letter to VAVBAWAS/CO/C&PTraining.

/S/
Bradley G. Mayes
Director
Compensation and Pension Service

Appendix IV: Comments from the Department of Veterans Affairs

Department of Veterans Affairs
Office of the Secretary

April 21, 2010

US GAO-GENERAL COUNSEL
2010 APR 22 PM 2:24

Mr. Daniel Bertoni
Director
Education, Workforce, and
Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Bertoni:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office's (GAO) draft report, ***VETERANS' DISABILITY BENEFITS: Expanded Oversight Would Improve Training for Experienced Claims Processors* (GAO-10-445)** and generally agrees with GAO's conclusions and concurs with GAO's recommendations to the Department.

At the initiation of this review, the Veterans Benefits Administration (VBA) informed GAO of the Compensation and Pension (C&P) Service's initiative to revise the Core Technical Training Requirements (CTTR) for experienced claims processors. This initiative was already in the developmental phase when GAO began the review.

VBA has an active program to support the development of training for experienced claims processors. This program has grown significantly over the past six months, and VBA has made substantial progress in using the VA Learning Management System (LMS) to manage training activities.

In order to restructure the CTTR for experienced claims processors, C&P staff reviewed National STAR quality analyses and the results of two studies released by the Office of Employee Development and Training. Feedback concerning field needs and local "best practices" was also obtained during the July 2009 national Training Managers Conference and from regional office employees who served as centralized training instructors during FY 2009. Since July 2009, C&P site visits to regional offices include a member of the C&P training staff specifically to gather and evaluate information regarding training issues and compliance.

The GAO draft report refers frequently to the results of its survey of VBA claims processing staff administered between August 12, 2009, and September 11, 2009. VBA completed its training review and implemented the CTTR curriculum changes effective January 15, 2010. Prior to completion of the review, GAO was provided detailed information regarding the curriculum changes for claims processors. VBA will continue to improve and expand the CTTR training curriculum as needed.

Page 2

Mr. Daniel Bertoni

VBA continues to place a high priority on training for claims processors. Actions to address the areas of concern identified by GAO are already underway. The enclosure specifically addresses GAO's recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,

John R. Gingrich
Chief of Staff

Enclosure

Enclosure

Department of Veterans Affairs (VA) Comments to
Government Accountability Office (GAO) Draft Report
VETERANS' DISABILITY BENEFITS: Expanded Oversight Would Improve Training for Experienced Claims Processors
(GAO-10-445)

GAO Recommendation: We recommend that the Secretary of Veterans Affairs direct the Undersecretary for Benefits to take the following three actions:

Recommendation 1: To ensure that claims processors receive the types of training required by VBA each year, VBA should adopt procedures for routinely monitoring and ensuring compliance with annual training requirements, including more fully using its LMS to ensure that claims processors receive required CTTR training, and required ad hoc training on emerging topics.

VA Response: Concur. Monitoring compliance with training requirements is a collaborative effort between the Office of Field Operations (OFO), the Office of Employee Development and Training (ED&T), and the appropriate business line that determines the training requirements. OFO monitors regional office (RO) compliance through area office site visits. During area office site visits, Area Directors meet with the RO Director and Training Manager to discuss the RO's training plan, training compliance, current training status of employees, and appropriate follow-up actions. Area offices review the RO's Learning Management System (LMS) summary report to ensure proper documentation of training and verify this through employee spot checks. Area offices may also use LMS to conduct additional monitoring of training compliance for ROs that have training concerns. The Area Director addresses any concerns with the RO Director and Training Manager to ensure proper action is taken.

Beginning in FY 2010, ED&T provides quarterly LMS summary reports directly to OFO. These reports are issued to VBA RO leaders providing the percentage of claims processors meeting annual training requirements. Area Director and RO Directors conduct local analyses, implement follow-up actions as necessary, and report results to OFO and ED&T for review. VBA Central Office recently developed a template for future use by all ROs to report on compliance with training requirements. Beginning in the fourth quarter of FY 2010, ROs will submit quarterly reports to OFO and ED&T for review to ensure compliance with annual training requirements. VBA considers this recommendation fully implemented.

Recommendation 2: To ensure that regional offices record training activities consistently in the LMS so that LMS data are reliable, VBA should develop clear written guidance on the types of activities all regional offices should and should not count toward completion of annual training requirements.

1

Enclosure

Department of Veterans Affairs (VA) Comments to
Government Accountability Office (GAO) Draft Report
VETERANS' DISABILITY BENEFITS: Expanded Oversight Would Improve Training for Experienced Claims Processors
(GAO-10-445)

VA Response: Concur. During 2009, the Compensation and Pension (C&P) Service identified targeted areas for training and began developing national training materials to provide standardized training for experienced claims processors. On January 15, 2010, VBA published Fast Letter 10-05 (Attachment A), which directed ROs to provide training selected from a list of national training topics. VBA published standardized training materials for claims processors and established national LMS item numbers to ensure that regional offices record activities consistently in LMS. The standardized item numbers are available within LMS and on the relevant VBA website.

C&P Service is developing a methodology with criteria for use in defining the types of locally-developed activities that should and should not count toward completion of training requirements. These training activities will also be recorded in LMS. This process is expected to be implemented by September 30, 2010.

Recommendation 3: To ensure that training is appropriate for experienced claims processors, VBA should develop and implement a written strategy for systematically assessing the content, mode and timing of training experienced claims processors receive in regional offices and make improvements, when indicated. Such a strategy should include a standardized approach for

- obtaining and analyzing feedback from experienced claims processors on the appropriateness of non-CTTR training provided by regional offices, and
- obtaining input from all regional office managers and training coordinators on the appropriateness of CTTR course content.

VA Response: Concur. In January 2010, VBA developed and published a strategy for systematically assessing the national training required of claims processors, *Monitoring and Evaluation Plan for Core Technical Training Requirements (CTTR)* (Attachment B). During the February 24, 2010, Associate Deputy Under Secretary for Field Operations call, VBA announced implementation of this plan and the mandatory course evaluation protocol for use by all employees who receive CTTR training. Employee feedback will be used to improve training for experienced claims processors. These improvements may include changes to the content, mode, and timing of training. VBA will also explore the feasibility of using the evaluation tool to obtain feedback on locally developed training and other non-CTTR course content. VBA will also consider using a similar evaluation protocol to obtain feedback from other sources such as

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Enclosure

Department of Veterans Affairs (VA) Comments to
Government Accountability Office (GAO) Draft Report
VETERANS' DISABILITY BENEFITS: Expanded Oversight Would Improve Training for Experienced Claims Processors
(GAO-10-445)

managers and training coordinators. VBA expects to complete the assessment of development of these remaining evaluation tools by September 30, 2010.

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Attachment A

DEPARTMENT OF VETERANS AFFAIRS
Veterans Benefits Administration
Washington, D.C. 20420

January 15, 2010

Director (00/21)
All VA Regional Offices and Centers

Fast Letter 10-05

SUBJ: Revision of Core Technical Training Requirement (CTTR) Hours for Veterans Service Representatives (VSRs) and Rating Veterans Service Representatives (RVSRs).

Purpose

There is a critical need to ensure national training efforts are consistent and aligned with VA's organizational goals. Veterans Benefits Administration (VBA) field offices provide specific employee training which enhances delivery of quality service to Veterans. Each office is responsible for establishing training plans at the beginning of every fiscal year and for ensuring employees complete the designated number of Core Technical Training Requirement (CTTR) hours. The C&P Training Staff has been working with the Systematic Technical Accuracy Review (STAR) Quality Staff to use STAR findings to develop a standardized national training agenda. The result is an 85-hour curriculum, specific to level of experience, for VSRs and RVSRs. This curriculum includes mandatory technical training courses, while allowing flexibility for local office needs.

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Procedure

Both the VSR and RVSR positions are highly standardized positions, and as RVSR or VSR experience levels increase, their ability and knowledge also increases. Because of the varying level of knowledge expected at each of the skill levels, experience level-specific training, has been developed. This training is identified as follows: Entry Level – in position less than 6 months; Intermediate Level – in position 6 to 24 months; and Journey Level – in position over 24 months.

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Director (00/21)

Beginning in FY 2010, all VSRs and RVSRs who have completed the Challenge curriculum and/or have more than six months in their job positions will be required to complete a minimum of 85 hours of technical training. The C&P Training Staff will make available specific training materials for 40 hours of mandatory technical training. This will standardize at least half of the required training for all VSRs and RVSRs. An additional 20 hours of technical training must be selected from the standardized instructional content available on the C&P Training website. The remaining 25 hours will be reserved for station-determined issues/topics. VA mandatory training, such as Cyber Security and Ethics, will count as part of the 25 hours of locally directed training.

The mandatory training topics along with the associated training materials are being posted on the C&P Training Website as they are completed. Topics and materials for the entire 85 hours of the curriculum will be available by the end of January 2010.

The CTTR courses will be entered as items in the VA-Learning Management System (LMS). The LMS will be updated as additional training materials are developed and released to the field. The revised CTTR will reflect the appropriate curriculum based on two skill levels (Intermediate Level and Journey Level) for both the VSR and RVSR positions.

The C&P Service is working with ED&T to develop a mandatory course evaluation protocol for CTTR training. In the near future this evaluation protocol will be incorporated into the CTTR training program for the purpose of ensuring CTTR compliance and evaluating the effectiveness and quality of the standardized training curriculum. Additional guidance will be provided once the mandatory course evaluation protocol is ready for deployment.

Questions

E-mail questions concerning this letter to VAVBAWAS/CO/C&PTraining.

/S/
Bradley G. Mayes
Director
Compensation and Pension Service

Attachment B

CTTR Plan
January 2010

MONITORING AND EVALUATION PLAN
FOR
CORE TECHNICAL TRAINING REQUIREMENTS (CTTR)

January 2010

Compensation and Pension Service – Training Office
Veterans Benefits Administration

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Appendix A: CTTR Course Evaluation 4

Purpose

To specify the general processes for 1) monitoring core technical training requirement (CTTR) compliance and 2) evaluating the effectiveness and quality of the standardized CTTR training curriculum.

Procedure

Background

CTTR Requirements

All VSR and RVSR employees are required to complete a series of training courses in order to satisfy their CTTR (IAW Fast Letter 10-05 and Training Letter TBD).

All VSR and RVSR employees must submit an on-line CTTR Course Evaluation immediately upon completing each training course.

Each Regional Office (RO) is responsible for ensuring employees complete the designated number of CTTR hours. ROs must certify their employees' fulfillment of training hours by entering information into the VA - Learning Management System (LMS) for each training course that is not automatically entered by a computer system.

CTTR Course Evaluation

C&P Service will maintain a mandatory online CTTR Course Evaluation (see appendix A) for the purpose of ensuring CTTR compliance and evaluating the effectiveness and quality of the standardized training curriculum.

C&P is responsible for coordinating the promulgation of both these requirements and how to access the online CTTR Course Evaluation.

CTTR Reporting

C&P Service will use an online reporting system and a "dashboard" to monitor responses to the CTTR Course Evaluation for both compliance and evaluation as required by Fast Letter 10-05.

Monitoring Compliance

C&P Service will monitor compliance with the training and evaluation requirement by:

1. Verifying the completion of the prescribed number of hours of training.
2. Comparing the number of evaluations submitted for each training course to the number of employees certified on the LMS as having fulfilled each training course. (Note: the ability to compare surveys with LMS entries will be limited during the pilot year.)
3. Examining the frequency of employee response choices to particular items on the CTTR Course Evaluation to ensure that employees are being properly provided the prescribed

training. For example, C&P service will monitor the number of employees who indicate either that a training course took a lot less than the allotted time to complete or that they did not know the name of a training course, its objectives, or the time allotted to the training.

C&P Service will monitor CTTR compliance both by RO and by area. Areas will be identified as having compliance concerns based on the number of their ROs flagged as non-compliant.

Evaluating the Standardized CTTR Training Curriculum

In accordance with Fast Letter 10-05, C&P Service will evaluate the effectiveness and quality of the standardized CTTR training curriculum by analyzing employees' responses on the CTTR Course Evaluation. C&P Service will keep track of:

1. How useful employees think each course is for teaching them new knowledge or skills.
2. How relevant they think each course is to their job.
3. How worthwhile they think the course is.
4. How well the training achieved its objectives.
5. How well the course was presented/delivered.
6. The quality of the facilities in which the training was conducted.

ED&T and TT&E will provide technical assistance with the surveys, and a summary of the evaluation data at intervals identified by C&P Training.

Appendix A:
CTTR Course Evaluation

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CTTR Course Evaluation

The VBA is committed to providing quality training for its employees.
Please help us do so by providing your opinion about the training course you just completed.

Training Course Completed [Select an option]
Regional Office [Select an option]
Experience Level [Select an option]

Note: * indicates a mandatory question.

		Not at All	*Minimally*	*Moderately*	*Mostly*	*Extremely*	*Not Applicable*
* 1.	How useful was this course for teaching you new knowledge, skills, or for refreshing your memory about important facts, policies, procedures, or duties?	○	○	○	○	○	
* 2.	How relevant is the content presented in this course to your job?	○	○	○	○	○	
* 3.	If you think the content is *at least minimally relevant*, how confident are you that you will be able to apply the knowledge and/or skills to your job?	○	○	○	○	○	○
* 4.	How worthwhile is the VBA's requirement for you to complete this course?	○	○	○	○	○	

	Poorly	*Fairly*	*Adequately*	*Excellently*	*Don't know the*

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objectives

* 5.	How well did this course achieve its objective(s)?	○	○	○	○	●
* 6.	How well was the course presented?	○	○	○	○	

7. Please offer any comments you may have about the content and/or presentation of the course.

		Poor	Fair	Good	Excellent	Not Applicable
* 8.	Please rate the training facilities (*if* your training was conducted in a classroom setting).	○	○	○	○	○

9. Please offer any comments you may have about the training facilities.

		No issue(s) at all	*Only minor issue(s)*	*Fairly serious issue(s)*	*Very serious issue(s)*
* 10.	Did you have any issue(s) during this course?	○	○	○	○

* 11. Please describe the issue(s). If you selected "No issue(s) at all," please enter, "Not applicable."

* 12. How long did it take you to complete this course? [Select an option]

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13. If you took *a lot more* or *a lot less* than the allotted time to complete the course, please describe why.

Thank you for completing this questionnaire.

Submit

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Daniel Bertoni, (202) 512-7215 or bertonid@gao.gov

Staff Acknowledgments

Clarita Mrena (Assistant Director), Regina Santucci, Martin Scire, Julie Corwin, and Lisa Fisher made significant contributions to this report. In addition, Greg Wilmoth and Stuart Kaufman provided guidance on research design and methodology, Dae Park assisted with statistical methodology, Joanna Chan assisted with data analysis, Roger Thomas provided legal counsel, Susan Aschoff helped with report preparation, and James Bennett assisted with graphics.

Related GAO Products

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