Report to the Ranking Member,
Committee on Veterans' Affairs,
House of Representatives

June 2021

VA DISABILITY BENEFITS

Veterans Benefits Administration Could Enhance Management of Claims Processor Training

A Century of Non-Partisan Fact-Based Work

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Why GAO Did This Study

In fiscal year 2019, VBA processed over 1.4 million claims for disability compensation and provided about $88 billion in benefits to veterans injured in service to their country. Claims processors receive training to help them determine veterans' eligibility for these benefits.

GAO was asked to review VBA's management of training for disability claims processors. This report examines the extent to which VBA applied relevant leading practices identified by GAO for planning, designing, implementing, and evaluating training, among other objectives.

GAO reviewed relevant federal laws, regulations, policies, and training materials; assessed VBA's efforts against relevant leading practices for training in the federal government; and interviewed officials from VBA headquarters and managers and claims processors at four regional offices, selected for variation on office size, region, and claims workload.

What GAO Recommends

GAO is making 10 recommendations, including that VBA establish an integrated and comprehensive plan and performance goals for its training program; document and use criteria to inform its selection of training delivery mechanisms; develop policies to monitor compliance with required training; collect and incorporate stakeholder feedback; and evaluate training on a recurring basis. VA generally concurred with GAO's recommendations.

View GAO-21-348. For more information, contact Elizabeth H. Curda at (202) 512-7215 or curdae@gao.gov.

What GAO Found

The Veterans Benefits Administration (VBA) has over 9,000 employees who process veterans' claims for disability compensation. To ensure claims processors have the skills needed to handle disability claims efficiently and effectively, training is a key strategy. Training is particularly important as VBA hires more staff and implements new initiatives.

GAO assessed VBA's training program for disability claims processors against leading practices for training related to planning, design, implementation, and evaluation. GAO found that VBA partially applied these leading practices.

- **Planning.** VBA's planning included some efforts to determine the skills and competencies needed for a trained workforce to process claims, consistent with leading practices. However, it lacks an integrated and comprehensive plan to ensure training improves individual and agency performance. Specifically, VBA's planning has not been guided by training program goals or a governance structure that sets priorities with a strategic focus on how efforts will contribute to results. Instead, VBA has used a project-by-project planning approach.

- **Design.** In designing its training program, VBA has used a variety of training delivery mechanisms, consistent with leading practices. For example, mechanisms include self-paced and instructor-led classroom training and software to manage and deliver training. However, VBA lacks criteria to inform its selection of the most appropriate mechanism to deliver each course.

- **Implementation.** Regional offices and VBA headquarters work together to deliver training, per leading practices. However, VBA's policies to monitor the extent to which claims processors have received required training are incomplete. Specifically, it lacks policies requiring VBA to identify and correct deficiencies in completing annual training for experienced claims processors.

- **Evaluation.** VBA collects and incorporates some stakeholder feedback about training and recently finalized plans to evaluate certain training, consistent with leading practices. However, VBA's efforts do not include key stakeholder perspectives, such as those of experienced staff and their supervisors, and VBA does not have policies to ensure evaluations are consistently planned and conducted. GAO's prior work indicates that evaluation has been a consistent gap in VBA's management of training.

VBA officials described several challenges to fully applying leading practices for planning, such as other higher priorities and the frequency with which the agency is tasked with urgent or emerging training needs. VBA also stated that it has some specific strategies in place to guide training efforts, such as setting annual training requirements. Nevertheless, fully applying leading practices for training would provide VBA greater assurance that its workforce is sufficiently skilled to efficiently and effectively process disability claims and provides high-quality service to veterans.

United States Government Accountability Office

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Abbreviations

COVID-19	Coronavirus Disease 2019
OFO	Office of Field Operations
OTM	Office of Talent Management
RVSR	Rating Veterans Service Representative
TMPI	Office of Talent Management, Training Management and Performance Improvement Division
TMS	Talent Management System
VA	Department of Veterans Affairs
VASRD	Veterans Affairs Schedule for Rating Disabilities
VBA	Veterans Benefits Administration
VSR	Veterans Service Representative

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U.S. GOVERNMENT ACCOUNTABILITY OFFICE
A Century of Non-Partisan Fact-Based Work

441 G St. N.W.
Washington, DC 20548

June 7, 2021

The Honorable Mike Bost
Ranking Member
Committee on Veterans' Affairs
House of Representatives

Dear Mr. Bost:

The Department of Veterans Affairs' (VA) Veterans Benefits Administration (VBA) provides annual training to more than 9,000 claims processors across its 56 regional offices to help ensure claims processors are making quality decisions on veterans' claims for disability compensation benefits. In fiscal year 2019, VBA processed more than 1.4 million claims for disability compensation and provided about $88 billion in benefits to veterans injured in service to their country.

VBA's claims processors use relevant regulations and processes to determine veterans' eligibility for these benefits. Effective training is a key strategy to ensure claims processors have the skills needed to process disability claims efficiently and effectively, and ultimately provide high-quality service to veterans.[1] This training is particularly important since VBA continues to implement new initiatives and make changes to claims processing procedures while hiring more staff. Moreover, in January 2020, the agency began processing thousands of additional disability claims related to exposure to herbicides during the Vietnam War due to the enactment of the Blue Water Navy Vietnam Veterans Act of 2019.[2] VBA's capacity to address claims is also being hindered by surges in other workloads, such as by the Coronavirus Disease 2019 (COVID-19) pandemic-related slowdowns in medical exams and hearings. The disability compensation program has long-standing challenges in

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[1]Although training is a key human capital strategy available to agency leaders to achieve goals and enhance performance, not every situation calls for additional training. Barriers to performance could relate to obsolete technology, for example, rather than a lack of knowledge or skills.

[2]Among other things, the Blue Water Navy Vietnam Veterans Act of 2019 extended the presumption of service connection for disability compensation for certain illnesses associated with exposure to herbicides, such as Agent Orange, to veterans who served in the offshore waters of the Republic of Vietnam during the Vietnam War. Pub. L. No. 116-23, § 2(a), 133 Stat. 966, 966-967.

managing large workloads and making timely decisions on initial and appealed claims. The program was added to GAO's High-Risk List in 2003.[3]

Our prior work has identified leading practices to help federal agencies improve their strategic training efforts by assessing how they plan, design, implement, and evaluate effective training programs.[4] In prior reviews, we had assessed VBA's training for claims processors against leading practices for training, and had identified issues with monitoring training completion, evaluating training effectiveness, and using feedback.[5]

You asked us to review VBA's management of its training for disability claims processors.[6] This report examines the extent to which VBA applied relevant leading practices for: (1) planning and designing training for disability claims processors; (2) implementing and evaluating training for disability claims processors; and (3) processing Blue Water Navy disability (BWN) claims.

For all three objectives, we reviewed relevant federal laws, VBA policy documents, reports and planning documents related to aspects of the

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[3]VA's disability compensation program has long-standing management challenges. These challenges are included on our high-risk list that shows the government operations most vulnerable to fraud, waste, abuse, or mismanagement, or in need of transformation. One high-risk area is improving and modernizing VA disability programs, including managing claims workloads and updating VA's eligibility criteria. See GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, GAO-21-119SP (Washington, D.C.: Mar. 2, 2021), 267.

[4]GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government,* GAO-04-546G (Washington, D.C.: Mar. 1, 2004). In this report, we identified leading practices through consultations with government officials and experts in the private sector, academia, and nonprofit organizations; examinations of relevant federal laws and regulations related to training and development in the federal government; and reviewing the sizeable body of literature on training and development issues, including previous GAO products on a range of human capital topics.

[5]See, for example 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).

[6]Throughout this report, we use the terms "disability claims processors" and "claims processors" interchangeably.

training program.[7] We also interviewed agency officials from VBA offices with responsibilities for claims processor training in headquarters and the field. We then compared VBA's efforts—as described in documentation and interviews—to leading practices identified in our 2004 guide for assessing federal government training efforts, as well as relevant federal regulations, and VBA's training policies.[8] Our guide outlines four broad, interrelated components—(1) planning and front-end analysis, (2) design and development, (3) implementation, and (4) evaluation—and identifies leading practices of effective training and development programs that should be present in each of the components.[9] We assessed VBA's training against those practices we determined were relevant to the scope of our review, which looked at VBA's general program of training for all claims processors. See appendix I for relevant practices and our assessment.[10] Based on this assessment, the report discusses areas of strategic importance to the training process.[11] We assessed the extent to which the agency applied leading practices in each component to its overall training processes and BWN training. We used the following categories to describe the extent to which the agency applied relevant leading practices:

- Generally applied: agency applied most of the relevant leading practices.

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[7]This review focused on training requirements for claims processors as defined in VBA policy. We did not review VBA's claims processing quality review efforts, which may result in additional refresher training for claims processors. These efforts include the national Systematic Technical Accuracy Review (STAR) and regional office quality review teams. For more information, see Department of Veterans Affairs Office of Inspector General, *The Systematic Technical Accuracy Review Program Has Not Adequately Identified and Corrected Claims-Processing Deficiencies*, #19-07059-169 (July 22, 2020) and Deficiencies in the Quality Review Team Program, #19-07054-174 (July 22, 2020).

[8]GAO-04-546G.

[9]For example, one practice in the design and development component is that agencies take steps to ensure that training is connected to improving individual and agency performance in achieving specific results. Attributes that would indicate the agency's effort in this area include: a formal training strategy and tracking and other control mechanisms to ensure that all employees receive appropriate training.

[10]Leading practices discussed in the report have been edited or paraphrased to improve readability.

[11]GAO's training guide describes core characteristics of strategic training, including strategic alignment, leadership commitment, stakeholder involvement, accountability, data quality assurance, and continuous performance improvement. See GAO-04-546G, 78.

- Partially applied: agency applied some of the relevant leading practices.
- Did not apply: agency did not apply any of the relevant leading practices.

We selected four VA regional offices for more in-depth review: Boise, Idaho; Cleveland, Ohio; Jackson, Mississippi; and Waco, Texas—selected for variation on office size, VBA district or region, and BWN claims workload. For each office we obtained documentation on their processes and plans for training, and interviewed regional office leadership, training managers, and others responsible for the training of disability claims processors. We also conducted discussion groups consisting of 7 to 8 randomly selected claims processors at each of the four regional offices. Information obtained from these interviews cannot be generalized to all regional offices and staff.

For objective one on planning and design, we collected and analyzed information from VBA officials and relevant documents on the planning and design of disability claims processor training. We also reviewed a selection of training materials. Using course descriptions from VBA's Learning Catalog and the list of courses required in fiscal year 2020, we grouped training courses into required, elective (regional office-selected), and training courses for newly hired or promoted claims processors. We also randomly selected and reviewed five courses to determine when the training was last updated; if training included a mix of theoretical and practical content; and if the training included specific, measurable learning objectives.

For objective two on implementation and evaluation of training, we also assessed the application of VBA's policies for monitoring claims processors' compliance with training requirements by reviewing VBA management reports and regional office plans and data. We reviewed fiscal year 2019 and 2020 training progress reports for claims processors in the four selected regional offices. We assessed the reliability of these data by conducting electronic testing, examining data system documentation, and interviewing staff knowledgeable about the data; we determined that these data were reliable for our purposes. To assess VBA's efforts to evaluate whether training efforts contribute to improved performance and results, we analyzed planned and completed evaluations of VBA's training. We also applied relevant federal standards

for internal control.[12] The control activities component of internal control was significant to this objective, including the principle that management implement control activities through policies, as well as the principle that management evaluate and remediate control deficiencies.

For objective three on BWN claims, we compared training for processing these claims against relevant leading practices in the four components for strategic training. For this analysis, we selected practices that we determined were applicable to a targeted, time-limited training effort. See appendix I. We also discussed BWN training in our discussion groups with staff from the Cleveland and Waco regional offices, two of the eight regional offices responsible for processing these claims. We also selected one BWN training course, and reviewed the course's materials using the same criteria described under objective 1. We selected the course on rating BWN claims because of the complexity of aspects of rating these claims, such as determining the effective date of benefits.

We conducted this performance audit from January 2020 to June 2021 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 and conclusions 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

Disability Compensation

Veterans with service-connected disabilities (i.e., injuries or illnesses incurred or aggravated during active duty military service) may receive monthly VA disability compensation payments according to the severity of their disability. The determination of severity is referred to as a disability rating, which is awarded in 10 percent increments up to 100 percent. The monthly benefit amount is determined by the veteran's disability rating and number of dependents, including a spouse.[13]

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[12]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 10, 2014).

[13]See generally 38 U.S.C. § 1101 et seq. As of December 2020, basic monthly payments were, for example, about $144 for a veteran with a 10 percent disability rating and no dependents, and about $3,450 for a veteran with a 100 percent disability rating, a spouse, and one child.

VBA staff in the Veterans Service Centers of the regional offices process disability compensation claims. These claims processors include Veterans Service Representatives (VSR) who gather evidence needed to determine entitlement and review the amount of the award and authorize payment, if any, and Rating Veterans Service Representatives (RVSR or rater) who decide entitlement and the rating percentage.[14] In fiscal year 2020, VA employed about 9,000 claims processors across its 56 regional offices. Claims processors determine disability ratings and benefit amounts using the Veterans Affairs Schedule for Rating Disabilities (VASRD) and VBA's M21-1 Claims Processing Manual.

A 2016 study of VBA claims processing showed that veteran claims were increasingly becoming complex, which adds to the time it takes to accurately process them.[15] Factors contributing to this complexity include more medical conditions per disability claim; claims addressing issues that require special training for claims processors, such as multiple organ damage; and, claims for issues such as post-traumatic stress disorder and traumatic brain injury. Additionally, VBA expects the disability compensation claims workload to increase as more than one million servicemembers will depart the military by 2024.

Training for VBA Disability Claims Processors

VBA's training program consists of instruction for (1) newly hired or promoted claims processors, and (2) experienced disability claims processors. Prior to fiscal year 2021, VBA training for newly hired or promoted claims processors was called "Challenge training."[16] This program was an in-residence, technical skills focused training program for claims processors to effectively and efficiently serve veterans. In 2019, VBA reported delivering Challenge training to almost 1,000 claims processors. For experienced claims processors, VBA requires the completion of 40 hours of training annually.

VBA's Compensation Service stated that per federal regulation, it is responsible for creating agency training programs that support a

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[14]We refer to Veterans Service Representatives and Rating Veterans Service Representatives collectively as "claims processors" throughout this report.

[15]See National Academy of Public Administration, Veterans Benefits Administration: Review of the Disability Claims and Appeals Process (Washington, D.C.: October 2016) 44-45.

[16]In fiscal year 2021, VBA transitioned Challenge Training to Virtual and In-Person Progression (VIP) training.

workforce capable of achieving agency mission and performance goals, and facilitating continuous improvement of employee and organizational performance, according to Compensation Service officials.[17] Compensation Service sets policy through the M21-3 training program manual, determines claims processing skills, designs training courses, and oversees the training. Staff in each regional office are responsible for administering their office's training program. According to officials, each regional office typically has a Training Manager who facilitates the regional office training programs, and larger offices may also have a Training Coordinator who assists the Training Manager.

Blue Water Navy Vietnam Veterans Act of 2019

In 2020, VBA began processing claims for disability compensation under the Blue Water Navy Vietnam Veterans Act of 2019. One provision of this law extends the presumption of herbicide exposure, such as exposure to Agent Orange,[18] to veterans who served in the offshore waters of the Republic of Vietnam between January 9, 1962 and May 7, 1975.[19] Another provision of the law extends the presumption of service connection to these veterans, if they have certain specified illnesses.[20] As of these provisions' effective date, January 1, 2020, veterans who meet this service criteria do not need to prove exposure to an herbicide, nor (if they have one of the specified illnesses) do they need to prove that their illness was incurred or aggravated during active duty military service. Instead, VA presumes that such veterans with a specified illness have incurred them as a result of exposure to an herbicide during their service, making it easier for the veteran to get disability compensation. If a veteran meets this service criteria and believes an illness that is not one of the specified illnesses is related to their military service, they can provide additional evidence, such as scientific or medical evidence stating that the illness is caused by an herbicide, for consideration with their claim.

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[17]See 5 C.F.R. § 410.201.

[18]Agent Orange is an herbicide used to clear leaves and vegetation for tactical military operations during the Vietnam War.

[19]See 38 U.S.C. § 1116A(b).

[20]See 38 U.S.C. § 1116A(a). Examples of these illnesses include, in certain circumstances, respiratory cancers, Non-Hodgkin lymphoma, type II diabetes, and chloracne. The specified illnesses are set forth in federal law. Federal law also requires that when VA determines (on the basis of sound medical and scientific evidence) that an association exists between an illness and exposure to an herbicide, VA must promulgate regulations providing for a presumption of service connection related to that illness. See 38 U.S.C. § 1116.

VA estimated that as many as 560,000 Vietnam-era veterans may be entitled to a presumption of exposure to an herbicide under the Blue Water Navy Vietnam Veterans Act of 2019, and estimated that the agency would receive about 238,000 claims and over 35,000 appeals as a result of this law by 2024.[21]

VBA's Planning and Process for Designing Training Partially Applied Leading Practices for Training

VBA Has Begun Identifying Skills and Competencies but Has Not Established Performance Goals or Fully Applied Other Leading Practices to Guide Its Training Efforts

VBA's planning efforts have focused on aligning training with skills and competencies and a project-by-project approach; however, it has not developed integrated and comprehensive plans or strategies, including performance goals and a governance structure, to guide the training program, according to leading practices. VBA provided several reasons for not fully applying these practices including that it is frequently tasked with urgent or emerging training needs. Such planning helps to ensure coordinated, rather than ad hoc efforts to address needs and achieve results, and serves as a foundation to design, implement, and evaluate training in accordance with agency needs and goals. Specifically, leading practices that support a strategic approach to training include:

- determining necessary skills and competencies;
- establishing performance goals;
- establishing a governance structure with clear lines of authority or other appropriate accountability mechanism to ensure sufficient attention is paid to planning and to coordinate strategies; and
- developing a documented training strategy.[22]

Determining skills and competencies. VBA has some planning efforts underway to help align training with claims processor skills and competencies. For example, VBA has conducted periodic job and task

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[21]Department of Veterans Affairs, "FY202 1Budget Submission, Volume III: Benefits and Burial Programs and Departmental Administration," February 2020, page VBA-175; "Expansion of Benefits to Blue Water Navy Vietnam Veterans,"

[22]GAO-04-546G.

analysis for claims processors. According to a VBA official, these analyses help ensure they are teaching concepts needed by claims processors. VBA also recently re-started an effort to create a competency-based training system for claims processors. According to VBA, the agency will determine the necessary skills and competencies for claims processors, and develop a program of instruction to align with these competencies, consistent with leading practices. VBA officials told us the first step in this effort will be completed in October 2021.[23]

Performance goals. In addition, VBA has not established performance goals for its training program. As we have previously reported, performance goals and measures should indicate how well a program is achieving its organizational goals and objectives, and managers should use performance information to continuously improve processes, identify performance gaps, and set improvement goals and priorities.[24]

In January 2020, VBA issued its fiscal year 2021-2025 strategic plan that includes several broad goals related to VBA training efforts.[25] For example, the strategic plan includes a goal to assess employee skills and

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[23]VBA is also updating its agency workforce plans and guidance, which may include additional assessment of skills and competencies and strategies to address identified gaps. We previously recommended that VBA incorporate key leading practices (such as identifying strategies to close workforce gaps, including training) into its succession planning for mission-critical occupations, which includes disability claims processors. As of April 2021, this recommendation remains unimplemented (open). See GAO, *Department of Veterans Affairs: Improved Succession Planning Would Help Address Long-Standing Workforce Problems*, GAO-20-15 (Washington, D.C.: Oct. 10, 2019).

[24]GAO-04-546G; and GAO, *Executive Guide: Effectively Implementing the Government Performance and Results Act*, GAO/GGD-96-118 (Washington, D.C.: June 1, 1996). We have also reported that federal agencies often face a variety of competing demands that managers must account for when measuring performance. A balanced set of performance goals can help manage competing demands and avoid overemphasizing some priorities at the expense of the others. See GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, GAO-03-143 (Washington, D.C.: Nov. 22, 2002); and *VA Disability Benefits: Improved Planning Practices Would Better Ensure Successful Appeals Reform*, GAO-18-352 (Washington, D.C.: Mar. 22, 2018).

[25]Department of Veterans Affairs, Veterans Benefits Administration, *Envision 2025: Strategic Plan, 2021-2025*. (Washington, D.C.: Jan. 2020).

address aptitude gaps within the VBA workforce.[26] However, VBA officials acknowledged that the disability claims processor training program does not have program-level goals or measures that also support broader VBA goals, as suggested by the leading practices.[27]

According to Compensation Service officials, they have not established program-level goals because their focus was on higher-priority tasks. As a result, Compensation Service's decisions to prioritize the re-design of training for newly hired or promoted claims processors and development of a competency-based training system are not guided by goals and associated performance information. For example, VBA has paused its skills certification program for claims processors, citing a lack of desired results. However, VBA officials did not identify performance measures used to gauge the performance of this effort. Without establishing a measurable performance goal, VBA is limited in its ability to assess the effectiveness of a program.

Governance structure. Several offices are involved in disability claims processor training, but VBA has not established a clear governance structure to ensure alignment of training efforts and accountability for training program results. Leading practices indicate such a structure can help ensure that training efforts are coherent and comprehensive and oriented toward results. Officials from VA's Human Resources Administration stated that they help coordinate training and professional development across the agency, but they also allow the appropriate administration within VA to handle its own training, including disability claims processor training. Within VBA, four entities have some responsibility for administering training (see fig.1).

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[26]VBA's workforce includes multiple VBA lines of business and staff offices, including Compensation Service, Education Service, Veterans Readiness and Employment, and Office of Performance Analysis and Integrity. As noted in our guide for assessing training in the federal government, training is one of several strategies to address identified workforce gaps. Other strategies may include job or process redesign, and hiring. See GAO-04-546G, 5.

[27]Prior GAO work on strategic planning has identified related leading practices. For example, agencies should identify specific and measurable performance goals to show progress toward broad strategic goals, as well as identify activities or strategies the agency will take to make progress toward its goals. See for example, GAO, *Environmental Justice: EPA Needs to Take Additional Actions to Help Ensure Effective Implementation*, GAO-12-77 (Washington, D.C.: Oct. 6, 2011).

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Figure 1: Veterans Benefits Administration Offices with Responsibility for Training of Disability Claims Processors
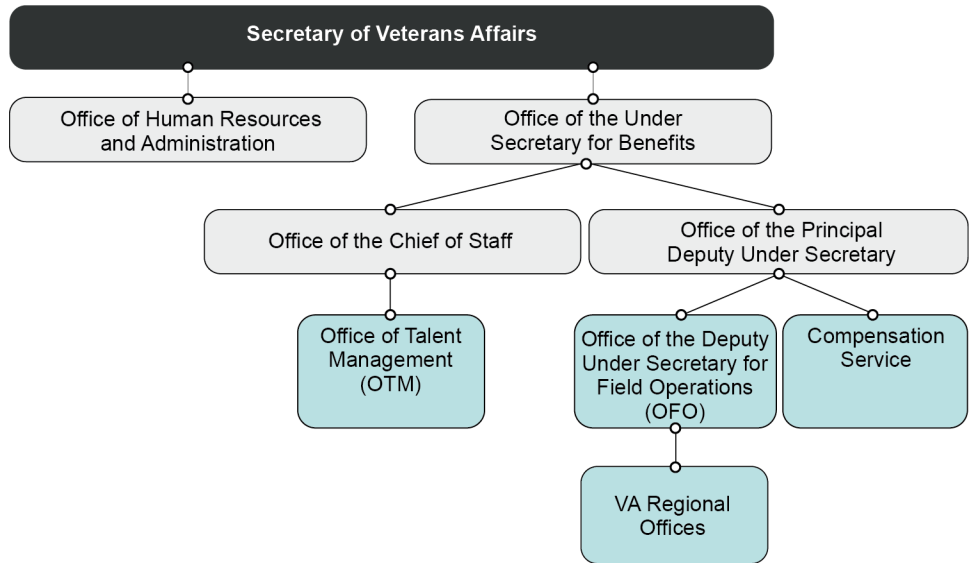
Source: GAO analysis of Department of Veterans Affairs (VA) documents and interview with agency officials. | GAO-21-348

Note: Offices with responsibility for disability claims processor training are shown in blue. The Under Secretary for Benefits oversees the Veterans Benefits Administration (VBA).

Specifically, the Office of Talent Management (OTM) supports VBA programs with many aspects of training, including managing training information technology platforms and instructional design services and guidance on training design and evaluation. However, OTM officials stated that they cannot require other VBA offices to follow its guidance. The Office of Field Operations generally oversees completion of national training, but does not oversee training content. Compensation Service develops most training content for claims processors, but selecting instructors to deliver the training is generally handled by each regional office.

VBA officials told us that they believe the roles for each office are clear and the offices have processes to work together to address training needs. For example, major efforts—such as the transition of the newly hired or promoted claims processor training—were overseen by an integrated project team that established clear roles for each office. However, these teams are project-specific rather than for the training program as a whole. VBA officials acknowledged that no single entity is responsible for guiding strategic training efforts. Further, an official noted

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that no policy establishes who is accountable for coordinating entities in managing VBA's training program for claims processors.

VBA officials cited some challenges in aligning planning efforts among OTM, Compensation Service, and the Office of Field Operations. For example, officials cited challenges with balancing hiring more staff to address increased claims workloads and effectively training claims processors. In recent years the Office of Field Operations' rate of hiring new claims processors has created large numbers of staff needing training at the same time. As a result, Compensation Service faced challenges in ensuring an appropriate instructor-to-student ratio so that the instructors can answer questions and ensure that training participants understand the concepts. In addition, OTM and Compensation Service's efforts to review training materials and design a competency-based training system were delayed and scaled back due to competing priorities and staff availability.

In 2008, VBA had an Employee Training and Learning Board to oversee and coordinate VBA training activities.[28] The board was responsible for developing annual training budget recommendations, identifying training initiatives, and making recommendations to the Under Secretary of Benefits, among other things. However, VBA officials told us that no such board currently exists in VBA, and they were unsure why the board was discontinued.[29]

Without a training program governance structure to coordinate and guide efforts, VBA may be missing opportunities to ensure relevant offices are

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[28]GAO-08-561.

[29]Other parts of VA have reported working to apply some of the leading practices for planning training efforts. Specifically, in its action plan to address high risk issues, the Veterans Health Administration (VHA) has, for example, reported having convened a training work group. VHA officials also plan to establish a training policy that will include guidance to VHA program offices to develop training plans for training initiatives and include criteria related to resource needs, implementation and evaluation planning. VHA has also established governance structures, including a Senior Executive Service-level sponsor and learning councils made up of program office training staff to enhance oversight and accountability. See Department of Veterans Affairs, *VA High Risk List Action Plan: Managing Risks and Improving VA Health Care* (Washington, D.C.: Mar. 2020) However, we reported that VA still lacks an enterprise-wide annual training plan, a central initiative for achieving the agency's identified outcomes. See GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, GAO-21-119SP (Washington, D.C.: Mar. 2, 2021), 289.

coordinating to efficiently and effectively plan and prioritize training efforts and ensure such efforts are consistent with VBA goals.

Documented training strategy. VBA has documented strategies for aspects of its training program, but has not developed or documented an integrated and comprehensive training strategy for claims processor training. In the face of competing demands, a training plan or strategy that includes the benefits of training investments, as well as the risks of unfavorable consequences if such investments are not made, can provide decision makers with information they need to allocate resources, according to leading practices.[30]

VBA created a documented strategy for one aspect of its training in the re-design of its training program for newly hired or promoted claims processors, previously referred to as Challenge training. As of fiscal year 2021, VBA's Challenge training has become the Virtual and In-Person Progression (VIP) training program. A major change under VIP training is that local instructors will deliver more introductory training at regional offices instead of at a VBA training center. To plan this training, VBA established goals, convened with stakeholders, and established roles and responsibilities for this effort.

VBA officials identified its national training curriculum, as presented in the M21-3 training program manual, as a program strategy. They stated that this document establishes the annual training requirements and training needed for claims processors new to their roles. However, this document does not include all key elements of a training plan or strategy as described in our prior work for assessing training. For example, these elements include linkages with the agency's strategic objectives, priorities established among competing demands, addressing employee developmental goals, anticipated benefits and projected costs, and ways to mitigate associated risks.[31]

VBA officials stated that the agency has not prioritized creating and documenting an integrated and comprehensive training strategy because they are frequently tasked with urgent or emerging training needs. For example, they had urgent training needs in response to appeals modernization, the Blue Water Navy Vietnam Veterans Act of 2019, and changes to claims processing due to the response to the COVID-19

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[30]GAO-04-546G.

[31]GAO-04-546G.

pandemic. To meet the tight timeframes that often accompany these training needs, VBA officials stated they use agile practices, which may include a project-by-project approach.

By developing and documenting an integrated and comprehensive training plan or strategy, VBA entities would have better guidance, such as specifying the mechanisms, tools, or processes for coordinating implementation of the strategy across VBA.

VBA Has Designed Training Using a Mix of Training Approaches, but Has Not Established Links to Goals or Documented Criteria to Select Training Delivery Mechanisms

VBA's training program design provides flexibility for regional offices to address training needs; however, VBA has not fully aligned the design of its training with strategic goals for the training program and its process for selecting the most appropriate training delivery mechanism has not been guided by criteria. Design and development involves identifying specific training and development initiatives that the agency will use, along with other strategies, to improve individual and agency performance. Leading practices that support a strategic approach to training design include:

- using the most appropriate mix of centralized and decentralized approaches;

- incorporating measures of effectiveness into course design;

- linking training to improving individual and agency performance; and

- determining the most effective training delivery mechanisms.

Using mix of approaches and measures of effectiveness. VBA has used a mix of approaches that allows headquarters to select some courses, along with opportunities for regional offices to customize training offerings to their local needs, per leading practices. In addition, VBA has made other efforts related to the design of training strategies. In 2020, VBA updated its guidance for developing and producing training materials. All five of the training courses we reviewed had learning objectives and most objectives were measurable. Further, claims processors in two of the four discussion groups stated that training had improved in recent years. For example, several participants provided positive feedback on a recent training course that was presented in the format of a podcast that employed a more conversational tone and interesting visuals. In addition, VBA uses a variety of training delivery mechanisms, including computer-based and instructor-led classroom training, which is consistent with leading practices. For example, the agency has invested in updated software platforms to manage training materials and deliver computer-based training.

Linking training to performance. Although it has taken steps to appropriately design training, VBA has not fully aligned the design of its training with strategic goals for the training program. According to leading practices for training, well-designed training and development programs are linked to agency goals and to the organizational, occupational, and individual skills and competencies needed for the agency to perform effectively.[32] As noted earlier, VBA lacks goals for its training program. Without strategic goals to guide decision making, VBA may be missing opportunities to determine where training can help in achieving these goals, and how training should be designed to support achieving goals and desired results.

Determining delivery mechanisms. VBA has offered a mix of training delivery mechanisms and taken advantage of updated technology to deliver training; however, it has not established documented criteria to use to determine when a given training delivery mechanism is appropriate. Leading practices state that agencies need to use decision rules or other information identifying the factors to help select the most effective mix of mechanisms to incorporate into training design.

Claims processors and managers we interviewed raised concerns about whether the training delivery mechanisms meet course requirements and the needs of attendees. Claims processors in three of the four regional office discussion groups said that they were receiving a significant amount of self-paced training, even prior to the COVID-19 pandemic, when more of their training became self-paced.[33] Claims processors at all four offices we spoke with viewed live, instructor-led training as their preferred learning mechanism because it provides opportunities to ask questions. Similarly, a regional office manager said that some training is better conducted face-to-face, such as trainings that require use of documents or include complex practical exercises. These exercises might require much more preparation and may be less effective in a virtual environment. Two regional office managers described benefits to pre-recorded training, stating that it can provide more consistency in information delivered. One of these managers noted this mechanism can be especially helpful for major claims processing changes. Another regional office manager mentioned the need for technology options that allow screen-sharing to help facilitate training.

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[32]GAO-04-546G, 5.

[33]VA closed its regional offices to the public on March 19, 2020 in response to COVID-19.

VBA officials stated that they choose the delivery mechanism for each course based on lessons learned from past trainings and professional judgment of VBA training staff. However, a VBA official acknowledged they did not have specific, documented criteria to guide these decisions, nor did they provide evidence of analyzing why past delivery mechanisms were chosen. Without documenting and using criteria to guide analysis for selecting training delivery mechanisms, the agency may be missing opportunities to address gaps in learning. In addition, VBA may not be producing the most effective training for its claims processors.

VBA's Efforts to Implement and Evaluate Training Do Not Fully Apply Leading Practices for Training

VBA partially applied leading practices for training implementation and evaluation. VBA has taken steps to ensure an environment conducive to effective training, including providing necessary resources to deliver training. However, its efforts to fully set minimum training requirements for instructors and monitor completion of all required training are incomplete. In addition, while VBA collected feedback from stakeholders and incorporated it into the training program, we found these efforts were not comprehensive or systematic. Similarly, VBA has begun structured evaluation planning and applied some appropriate analytical approaches to evaluate training; however, it lacks a comprehensive and consistent effort to evaluate the effectiveness of training.

VBA Provides Necessary Resources for Training, but Efforts to Set Minimum Training Requirements for Instructors and Monitor Completion of all Required Training are Incomplete

VBA has taken steps to implement training that aligns with leading practices, such as by providing regional offices latitude and resources to deliver training; however, its efforts to set minimum training requirements for instructors and monitor completion of all training requirements are incomplete. Examples of leading practices that support a strategic approach to implementation of training include:

- Ensuring an environment conducive to effective training, in part by (1) providing needed tools and resources to line managers and employees, and (2) ensuring qualified instructors; and

- Ensuring accountability for training, including efforts to monitor training.

Ensuring an environment conducive to training: tools and resources. VBA has taken steps to provide managers with the tools and resources they need to accomplish relevant tasks. Leading practices indicate that providing these resources is important for communicating the importance of training and fostering an environment conducive to training.

Managers we interviewed in the four selected regional offices said they generally have the resources to facilitate the training program and deliver training. For example, regional office managers said they select courses for their annual training plan to address the needs of their office, which they determine, for example, by reviewing claims processing error trends and consulting with the Quality Review Team (QRT).[34] Compensation Service provides materials for training through the VBA Learning Catalog, which is accessible to all employees. Similarly, VBA's Talent Management System is used to facilitate training tasks such as assigning courses and tracking training completion. Additionally, managers at two offices reported individually developing solutions for space constraints, including increased use of virtual training or staggered class times.

Ensuring an environment conducive to training: qualified instructors. VBA has made some efforts to help ensure instructors are qualified, but these efforts are incomplete. Leading practices state that instructors who are engaging, responsive, flexible, knowledgeable, and experienced benefit the agency because they can effectively transfer skills and knowledge to others.[35]

Consistent with these leading practices, we found that VBA had begun requiring headquarters approval of instructors who teach VIP training for newly hired or promoted claims processors at regional offices. As described earlier in this report, as part of the transition from Challenge training to VIP training, regional office instructors are responsible for providing more training locally than under the previous model. Planning documents for VIP training indicate that VBA intends for these instructors to be certified to teach. VBA officials told us that in the new model, regional offices nominate instructors for VBA headquarters approval. The form to submit instructors for approval asks whether the instructor has obtained VBA's Employee Learning Inspires True Excellence (ELITE) Instructor Certification and requires an endorsement from the instructor's

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[34]Each regional office has a Quality Review Team (QRT) that consists of experienced and skilled claims processors. These teams assess and monitor quality in the claims process, including through in-process reviews aimed at reducing rework. These teams are expected to contribute to improved accuracy and increase morale through skill development.

[35]GAO-04-546G.

supervisor.[36] VBA officials said that they will prioritize using instructors who have obtained this certification, which was introduced in June 2020. VBA officials said that they are monitoring whether instructors for newly hired or promoted claims processor training have achieved ELITE Instructor Certification.

For the experienced disability claims processor training, regional office managers may take steps to help ensure quality instruction. VBA has delegated responsibility to regional offices for identifying qualified instructors, and managers we interviewed in all four selected offices described various methods for ensuring that instructors are qualified. For example, managers at three offices said that they prioritize assigning members of the quality review team as instructors based on their subject matter expertise. Teaching courses also might be an additional duty for experienced claims processors. According to VBA performance standards, experienced claims processors are encouraged to volunteer to conduct needed training. Managers we interviewed at two offices said that, if instructors with subject matter expertise are unavailable, they select employees who are interested in learning more about the topic to instruct training because teaching can be an effective way to learn more about a subject. One office records its training sessions, and if trends in feedback surveys indicate an issue with training quality, a manager can independently review the training. Although some managers described optional instructor training opportunities, such as ELITE Instructor Certification, regional office managers were not aware of requirements for instructor training.

According to headquarters officials, minimum qualifications or requirements for all instructors who provide training at regional offices do not exist. While ELITE Instructor Certification is listed as an expectation for instructors in the fiscal year 2021 M21-3 Training Program Manual, VBA officials said this expectation is highly recommended rather than required for the experienced disability claims processor training.[37] With

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[36]According to VBA, the purpose of ELITE instructor certification is to provide highly qualified, agile, adaptive, and innovative instructors for VBA training. Instructors are trained and evaluated in both virtual and face-to-face classroom instruction. The certification includes self-study courses, an exam, a practicum, and an observation and evaluation of the instructor's skills. ELITE Instructor Certification builds on and replaces VBA's former instructor training program.

[37]According to the M21-3 Training Manual, in fiscal year 2021, instructors are expected to complete the core elements of ELITE Instructor Certification: pre-requisite web-based training, a comprehensive exam, and the ELITE practicum. This was a change from the fiscal year 2020 manual, which listed other courses as expected instructor training.

the exception of VIP training, VBA officials told us they do not monitor whether instructors at regional offices have completed the expected instructor training courses.

Additionally, claims processors in two of our four discussion groups described inconsistencies in instructor quality. In one office, for example, a participant described a training from the quality review team as higher quality compared to other training, and another participant found classes with participation to be more helpful compared to classes where instructors read material to the class. In another discussion group, claims processors also said they preferred classes with student participation, and that a training for trainers would be beneficial.

While VBA offers and encourages instructor training for the experienced disability claims processor training, whether instructors are consistently prepared to teach is unclear because VBA has not established minimum requirements for instructor training or qualifications for instructors. Without minimum requirements for instructor training and monitoring that training requirements are met, VBA cannot ensure that instructors across 56 regional offices both know the subject matter and issues involved and can effectively transfer knowledge and skills to others.

Ensuring accountability for training: monitoring training. VBA monitors training to ensure that claims processors complete centrally-assigned training; however, VBA did not ensure that all claims processors have completed all of their required training hours. Leading practices indicate that agencies should have control mechanisms, including delegating responsibilities, to ensure that employees complete assigned training.[38] Regional offices and Compensation Service staff monitor several aspects of claims processor compliance with training requirements.

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[38]Similarly, federal standards for internal control state that agencies should implement control activities through policies, which may include assigning responsibilities, defining day-to-day procedures addressing the timing of the control activity, and follow-up corrective actions to be performed if deficiencies are identified. See GAO-14-704G.

According to VBA policy, experienced claims processors are required to complete 40 hours of annual training as follows:

1. Compensation Service assigns courses totaling at least 15 hours of training in response to national priorities, such as trends in errors.

2. Regional offices select the remainder, up to 25 of the required 40 hours of training.[39] Regional office-selected classes must be selected from the VBA Learning Catalog to count toward annual training requirements.

3. Claims processors receive credit for training after completing an evaluation survey in TMS for an online course, and if the course was led by an instructor, by completing an assessment that measures the claims processor's learning.

4. Regional offices use TMS and another reporting tool to generate quarterly training progress reports, which are submitted to a Compensation Service repository.

Compensation Service's efforts to monitor its portion of the required hours align with leading practices, which state that organizations should ensure that training program managers and line managers will work together to monitor training compliance, including delegating responsibility and authority.[40] To that end:

- Officials indicated that staff from both regional office and headquarters can run monitoring reports using tools like TMS.

- Claims processors are reminded of their responsibility to complete training through expectations in performance standards.

- During interviews with regional office managers, they described their efforts to ensure training is completed on time. For example, two managers set early internal due dates for completing Compensation Service-mandated training to allow time for follow-up, and if necessary, involving supervisors in follow-up efforts.

- According to VBA officials, the Compensation Service-required annual training hours are closely monitored. In fiscal year 2019, a VBA

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[39]According to the M21-3 Training Program Manual, if Compensation Service assigns more than 15 hours of training, regional offices can reduce their selected training by a proportional amount. For example, if Compensation Service assigns 18 hours of annual training, regional offices must select at least 22 hours to meet the 40 hour requirement.

[40]GAO-04-546G.

summary report of such training states that at least 98 percent of claims processors completed each required course that year. Managers at most selected regional offices described receiving follow-up communication from VBA headquarters regarding employees who did not complete these courses.

However, we found indications that Compensation Service monitoring of the regional office-selected training is incomplete. The M21-3 Training Manual requires regional offices to submit quarterly compliance reports to Compensation Service. These reports have a standard format and detail the number of training hours each employee has completed. We reviewed these reports for the four regional offices we selected and reviewed Compensation Service's actions to monitor this training. We found that VBA might not ensure employees complete all 40 hours of their required training. For example:

- We identified issues with nearly half (7 of 16) of the end-of-year compliance reports we reviewed. We reviewed reports for the final quarters of two fiscal years, 2019 and 2020, to analyze compliance information collected by VBA.[41] All four of the reports from one regional office were incomplete, and we were unable to assess the reports. An additional three reports from a different regional office reported compliance rates below 90 percent for regional-office selected training hours. The remaining nine reports showed high rates of compliance (between 98 and 100 percent) with these requirements.

- In fiscal year 2021 and prior years, Compensation Service officials stated they monitored regional office-selected training by reviewing quarterly compliance reports. Compensation Service provided evidence of recent monitoring to ensure regional offices submitted reports as required by the M21-3 Training Manual. However, they did not provide documentation demonstrating their review of the reports to ensure claims processors completed all 40 hours of their required training, such as lists of issues identified or corrected.

- Current VBA policy does not require Compensation Service or the Office of Field Operations to centrally monitor claims processors' completion of all 40 hours of required training.

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[41]Compliance reports are prepared for the VSR and RVSR claims processor roles individually. We reviewed two reports for each of four regional offices for 2 fiscal years, totaling 16 reports.

- Compensation Service staff did not provide overall compliance data, such as the percentage of claims processors nationwide who completed regional-office selected training hours.

The nongeneralizable issues we identified in the selected regional office compliance reports, combined with a lack of nationwide data, suggest that Compensation Service's efforts are incomplete and might not provide reasonable assurance that claims processors are completing regional office-selected training.

Federal standards for internal control state that agencies should implement control activities through policies, which may include assigning responsibilities, defining day-to-day procedures addressing the timing of the control activity and follow-up corrective actions to be performed if deficiencies are identified.[42] Although VBA policy calls for regional offices to submit compliance reports on completion of regional-office selected training to Compensation Service, VBA policy does not require these offices to review the reports to identify and correct any deficiencies with regional office compliance. In January 2021, Compensation Service officials told us that they are coordinating with the Office of Field Operations to develop a standard operating procedure for monitoring in alignment with regional office reporting requirements. However, until this policy is developed and implemented, VBA may continue to lack reasonable assurance that claims processors are completing all of their annually required training.

VBA Has Not Comprehensively or Systematically Evaluated Training Effectiveness

VBA partially applied leading practices for evaluating training. VBA collected and incorporated into the training program some feedback from stakeholders on the strengths and weaknesses of the training. However, we found these efforts could be more comprehensive and systematic. Similarly, VBA had begun planning a structured evaluation of its training and applied some appropriate analytical approaches to evaluating training, but it lacked a comprehensive effort to evaluate the effectiveness of training. Examples of leading practices for evaluating training include:

- collecting feedback from a variety of stakeholders;

- incorporating feedback into the training program; and

- planning systematically for and conducting recurring evaluations using appropriate, cost-effective analytical approaches.

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[42]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C: Sept. 10, 2014). Principle 12.

Collecting feedback. VBA has collected feedback on the training program from several stakeholders, but some stakeholder perspectives were missing and these efforts were not comprehensive. Leading practices state that agencies should obtain a wide variety of stakeholder perspectives to assess how training efforts contribute to improved performance. VBA has collected feedback from stakeholders, including Veterans Service Center Managers, other regional office managers, and claims processors regarding training for disability claims processors. Specifically:

- Claims processors provide feedback on a training course through a standard evaluation survey they receive following completion of each course. To receive credit for a training course, claims processors must complete the survey.

- VBA requires an assessment quiz at the conclusion of instructor-led courses to measure the extent to which learning occurred.

- In fiscal year 2019, Compensation Service surveyed Veterans Service Center Managers about training for newly hired or promoted claims processors about their satisfaction with Challenge training and opportunities to improve the program.

- Regional office managers we spoke with in the four selected offices described informal ways they can provide feedback to Compensation Service, such as through advisory councils, conferences, conference calls, and direct emails.

- Compensation Service training officials said that they have received feedback from regional office managers through direct emails and phone calls.

However, we found that VBA lacked efforts to comprehensively collect feedback as part of its training improvement efforts. For example, VBA officials did not describe efforts to proactively collect feedback from claims processors' direct supervisors, who, according to leading practices, might have valuable perspectives on the extent to which training contributes to employee performance. Although VBA has collected reactions to specific courses from claims processors, officials indicated the agency does not collect feedback from experienced claims processors about overall impressions of the training program. Outside of the efforts described above, VBA made limited efforts to use formal feedback mechanisms recommended by leading practices, such as surveys, interviews, and discussion groups. These formal feedback

mechanisms can be an important source of data to support evaluations of training.

During our site visit discussion groups with experienced claims processors and interviews with managers, we identified the following themes in feedback about the training program. These themes might not be reported in the standard evaluation surveys designed to gauge participant reactions to an individual course or tests administered at the end of a course.

- Managers in two offices said that to supplement information provided by Compensation Service, they create "highlights" of the most important information from updates to the M21-1 claims processing manual, a key job aid that explains how to process claims. Managers in these offices said that they create these highlights to make it easier for claims processors to review the information. According to leading practices, effective job aids can help minimize the need for additional training.

- Managers in two offices said that having a more formal mechanism for sharing recorded trainings on specialized topics would be useful. For example, a manager described a scenario in which one regional office might have a subject matter expert in a specialized claim type who has provided effective training on how to process the claim type. Instead of each regional office delivering a similar training without similar expertise, this manager suggested that it might save time and ensure consistent quality of instruction if regional office managers were able to access and provide claims processors with a recorded version of the expert-delivered training.

- Experienced claims processors across all four regional offices noted a perception that training is viewed as an impediment to claims processing work. This perception likely suggests to claims processors that training is less valued than completing claims.

- At least one claims processor in each group indicated that they were not sure whether the feedback they provide through end-of-class surveys is regularly reviewed.

- As we noted previously, participants in our discussion groups also expressed a preference for in-person and on-the-job training, as opposed to training offered online, and expressed some concerns about instruction quality.

The themes we highlighted above are not generalizable and may not reflect overall trends in training for disability claims processors. However,

these themes illustrate important insights on training that experienced employees and managers can provide to help inform efforts to improve training for disability claims processors.

Incorporating feedback. While VBA has incorporated some feedback from stakeholders to improve training, the agency might be missing opportunities to do so more comprehensively. Leading practices emphasize the importance of incorporating feedback into all four components of training efforts, using systematic monitoring and feedback processes, and incorporating feedback to identify problems and improve training programs as needed.

Examples of VBA's efforts to incorporate feedback to improve training include:

- Compensation Service training officials reported applying the results of the surveys regarding training for newly hired or promoted claims processors to improve the training. Compensation Service training officials also said that they provided the survey results to the integrated project team coordinating the redesign of this training.

- Compensation Service officials provided an example of changes made to a class as a result of informally analyzing feedback and assessments. Officials also described a regular, informal process for reviewing feedback comments from training for newly hired or promoted claims processors.

- Following each session of training for newly hired or promoted claims processors, Compensation Service created an after action report to summarize student scores on assessments and performance data, survey data, and lessons learned.

- During the course of our review, VBA updated its guidance for managing training course content to indicate that reviews of course content should include reviews of end-of-course feedback surveys and assessments.

However, we found that these efforts do not reflect a comprehensive, systematic approach to collect and incorporate feedback from relevant stakeholders on the strengths and weaknesses of the training program. Specifically, Compensation Service did not describe a policy, guidance, or criteria they use to determine what feedback to collect, how to collect it and from whom, and how to incorporate it into the training program. For example, Compensation Service officials said they implemented their surveys to Veterans Service Center Managers regarding training for

newly hired or promoted claims processors as the need arose. Officials also did not describe other, past efforts to formally survey other groups outside of the end-of-class feedback surveys or other formal efforts to review information they had collected. For example, they stated that they had not systematically reviewed after action reports for larger trends across several sessions.

In addition, Compensation Service officials did not describe to us a regular process for reviewing feedback from experienced claims processors for widely used classes, like those mandated by Compensation Service as part of annual training. Without such a documented policy that outlines its strategy for collecting and incorporating feedback, VBA might not be fully aware of practical improvements it could make to improve training to help improve claims processors' performance.

Planning and conducting evaluations using appropriate, cost-effective analytical approaches. VBA has begun to plan some evaluation efforts, but has not completed efforts to plan and conduct evaluation activities to help ensure continuous improvement of its training program. Leading practices state that developing an evaluation plan can guide agencies in a systematic approach to assess the effectiveness and efficiency of both specific training and development programs, and more comprehensively its entire training and development effort. Further, these leading practices emphasize the importance of both using appropriate analytical approaches and ensuring proper prioritization of evaluation efforts. For example, more advanced evaluation activities can be complex and costly to implement. Planning can help agencies conduct evaluation activities that are cost-effective and avoid either over-or under-investing in evaluation. Leading practices also recommend recurring assessments of training as part of continual efforts to evaluate and improve training efforts. Additionally, VBA's strategic plan for fiscal years 2021-2025 emphasizes the need for a learning agenda, evaluation plan, and a capacity-building plan to support evidence-based decision making.[43] Further, VBA's strategy for evaluating training identifies implementing an

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[43]Department of Veterans Affairs, Veterans Benefits Administration, *Envision 2025: Strategic Plan, 2021-2025* (Washington, D.C.: Jan. 2020), element 3.5; 3.5.3.

evaluation plan as a best practice and recommends updating evaluation plans on an annual basis.[44]

VBA has recently begun evaluation planning to assess the effectiveness of its training for some newly hired or promoted claims processors, as well as experienced claims processors. Both sets of evaluation plans are being guided by VBA's strategy for evaluating training, which was published in early 2020 by OTM's Training Management and Performance Improvement (TMPI) division. According to officials, TMPI provides evaluation support and assistance to VBA training programs, among other services.

We reviewed TMPI's strategy for evaluating training and found that it aligns with leading practices for evaluating training, including, for example, establishing expectations for program success, defining and implementing an evaluation plan, evaluating employee satisfaction with training, and evaluating learning and post-training performance improvement. The strategy is also aligned with the Kirkpatrick Model.[45] The strategy includes tools for VBA service lines to use to improve their evaluation planning, such as a self-assessment intended to help training managers examine their current processes and identify areas of improvement. The strategy also includes a checklist, organized by training phase that identifies specific elements or tasks for training managers to complete to align their programs with best practices. For example, the Program Evaluation Phase of the checklist identifies tasks

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[44]Department of Veterans Affairs, Veterans Benefits Administration Office of Talent Management, Training Management and Performance Improvement (TMPI), *Strategy for Evaluating Employee Training within VA's Veterans Benefits Administration FY2020* (Washington, D.C.: 15 Jan 2020) pg. 4.

[45]The Kirkpatrick Model is a commonly recognized model for evaluating training and development efforts. VBA uses the Kirkpatrick Model, with New World Kirkpatrick Model enhancements, conceived of by Donald L. Kirkpatrick (co-author of Donald L. Kirkpatrick and James D. Kirkpatrick, Evaluating Training Programs: The Four Levels, 3rd ed. (San Francisco, CA: Berrett-Koehler, 2008)). Under this model, evaluations measuring the training participants' reaction to, and satisfaction with, the training program or planned actions to use new or enhanced competencies are known as Level one evaluations. Level two measures the extent to which learning has occurred because of the training effort. Level three measures the application of this learning to the work environment through changes in behavior that employees exhibit on the job because of the training or development program. The fourth level measures the impact of the training program on the agency's program or organizational results. See *GAO, Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government,* GAO-04-546G (Washington, D.C.: Mar. 1, 2004).

such as reviewing evaluation results annually and reporting progress in achieving performance improvement to stakeholders.

TMPI and Compensation Service officials told us that in fiscal year 2021 they plan to conduct evaluations of claims processor training.[46] Specifically,

- For some newly hired or promoted claims processor training, TMPI developed evaluation plans. We reviewed these plans, which included defined performance measures aligned with both basic and more advanced levels of the Kirkpatrick Model. The plans align data collection activities with each measure, such as surveys for claims processors who completed the training within 3 or 6 months, and surveys of their supervisors. In addition to questions with discrete response options with rating scales, the surveys include open-ended questions that will allow TMPI to collect information about opportunities to improve training.

- For the experienced claims processor training, Compensation Service has begun leveraging TMPI's evaluation planning resources for its training program. In the course of our review, Compensation Service officials stated they have had discussions with TMPI officials regarding VBA's strategy for evaluating training. In November 2020, Compensation Service officials stated they plan to complete TMPI's self-assessment and the checklist tools to help inform the development of an evaluation plan. However, as of March 2021, Compensation Service officials reported they have not completed these initial planning tools for the entirety of the training program. In May 2021, Compensation Service officials said that they plan to develop an evaluation plan by September 30, 2021.

In addition to these planning efforts, VBA has demonstrated some use of appropriate analytical approaches in its efforts to collect and informally incorporate end-of-course feedback from claims processors, as described

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[46]In the past, Compensation Service had full responsibility for the content and management of both the newly hired or promoted claims processor training and the training for experienced disability claims processors. However, as of 2021, while Compensation Service retained responsibility for training content for both sets of training, OTM now has responsibility for managing the training for newly hired or promoted claims processors.

previously.[47] Fully applying this practice would include determining when and how agency training efforts will be evaluated, such as through an evaluation plan, while considering such factors as the cost of the training effort, the size of the training audience and program visibility.

However, until Compensation Service completes its planning efforts, VBA will not have had a formal evaluation plan or completed an overall evaluation of its training for disability claims processors in recent years.[48] In addition, VBA will not be able to fully demonstrate it has taken a systematic approach for selecting cost-effective and feasible methods to assess the training program. VBA officials told us that, in the past, Compensation Service has not developed plans for or conducted recurring evaluations of its training due to competing priorities, such as high volumes of newly hired or promoted clams processors requiring training. Officials also noted that the breadth of the program and the evolving nature of training needs, for example, due to court decisions and legislative changes, presents challenges for evaluating their training. Moreover, OTM officials noted that until recently, Compensation Service had not requested their assistance with evaluation activities for claims processor training.

VBA has taken promising steps toward evaluating training, particularly for new hire training. However, until VBA completes and implements an evaluation plan, including experienced claims processor training, it will not be positioned to fully assess how its training efforts help develop claims processors and improve their performance.[49] It is also important for VBA

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[47]The end-of-class surveys and assessments we described earlier in this section are Level I and Level II assessments under the Kirkpatrick Model.

[48]In 2001 and 2008, we reported that VBA had not adequately evaluated its training for disability claims processors. See GAO-01-601 and GAO-08-561.

[49]Other parts of VA have reported working to apply some of the leading practices for evaluating training efforts. In its action plan to address high risk issues, VHA described, for example, that in fiscal year 2019, it began implementing a requirement to conduct a minimum Kirkpatrick Level 2 assessment for all accredited and non-accredited training. VHA conducted Kirkpatrick Level 2, 3, and 4 evaluations for the second quarter of fiscal year 2018 for VHA internally developed training. This directive supports VHA plans to establish a requirement for its program offices to assess performance to determine training gaps, develop comprehensive training plan and post-implementation evaluation assessment to determine effectiveness at a Kirkpatrick Level 3 or higher for all training-related endeavors. See Department of Veterans Affairs, *VA High Risk List Action Plan: Managing Risks and Improving VA Health Care* (Washington, D.C.: Mar. 2020).

to establish a policy to evaluate training on a recurring basis to enforce management's directives to support evidence-based decision making.

VBA Generally Applied Selected Leading Practices to Blue Water Navy Training, but Did Not Plan to Collect and Share Lessons Learned

VBA Generally Applied Selected Leading Practices for Planning, but Partially Applied Selected Design, Implementation, and Evaluation Practices

VBA generally applied selected leading practices for planning training for processing Blue Water Navy disability claims (BWN training) by setting goals and aligning training with needed skills. However, it did not fully apply selected practices within the design, implementation, and evaluation components, including analyzing the merits of various mechanisms to deliver training, providing job aids to support and reinforce training objectives, and assessing training effectiveness. We based our assessment of this individual, time-limited training initiative by selecting and applying relevant leading practices in each of the four components of our prior work for assessing federal government training.[50] VBA officials told us that they do not plan to revise the BWN training courses.

Training Planning

In developing its BWN training, we found that VBA generally applied the three selected leading practices we reviewed that were related to planning. Specifically,

- **Task team.** During the 6 months between the date of enactment and the effective date of the Act, VA established new policies and procedures, modified and augmented information technology systems, and planned internal and external communication strategies. To coordinate the activities needed for successful implementation of the Act, the Undersecretary for Benefits established a Tiger team comprised of Appeals Management Office, Office of Field Operations,

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[50]For this objective, we selected practices that we determined were relevant to a one-time effort, as compared to practices that are more comprehensive in nature and are discussed earlier in this report. See Appendix I.

and Compensation Service, among other VBA offices and business lines. An Integrated Project Team included a policy and procedures, training, and workload workgroup that reported to the Tiger team.

- **Project planning.** According to the project management plan, the BWN effort included goals and timeframes, which were tracked in an integrated master schedule. The plan indicated that success for the project would be measured by whether certain tasks were completed successfully and within the planned time, including establishing new policies for BWN claims processing; and being fully prepared for claims processing starting January 1, 2020.

- **Aligning skills and needs.** VBA's planning efforts sought to identify claims processors with the skills and competencies needed for processing BWN claims, and address gaps with training. Leading practices state that in planning training efforts, agencies should determine what skills and competencies are needed to meet current, emerging, and future needs, assess any gaps in current skills and competencies, and determine how a skill or competency gap can best be addressed, whether through a specific training or development program or other interventions.

VBA decided to select a small number of regional offices to handle the claims. Officials indicated that doing so would allow the agency to course-correct more nimbly when faced with challenges. Further, it planned to select claims processors from offices with prior experience with similar claims. Managers in two of the eight regional offices where BWN claims are being processed told us they believed they were selected due to relevant experience, such as processing claims for Agent Orange-related diseases.

Training Design

VBA's efforts to design BWN training partially applied selected leading practices. Specifically, VBA took steps to connect individual and agency performance and incorporate measures of effectiveness. Leading practices indicate that to maximize effectiveness of training, agencies should assess performance needs and skills of individual employees, and ensure staff selected for various positions have the necessary knowledge and skills.[51] Offices used various mechanisms to identify staff to process the claims. According to the Office of Field Operations, regional offices selected claims processors based on factors such as experience and individual performance. For example, one office met the required number of staff with a combination of volunteers and staff assigned through reverse seniority. Although this meant some selected staff were less

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[51]GAO-04-546G, 30.

experienced, managers at this office stated that all staff processing BWN claims were fully successful according to their performance standards.

VBA took steps to ensure that claims processors for BWN had the necessary skills, by developing an overview course and follow-on courses tailored to processors' particular roles. VBA designed training that corresponded to the roles for raters, VSRs, and those responsible for using tools to verify herbicide exposure. We reviewed materials for the BWN course for raters. These materials generally aligned with leading practices for training materials. Specifically, three of the course's four learning objectives were measurable, and training provided a mix of theoretical and practical content, including several claims scenarios.

Furthermore, VBA employed a variety of training delivery mechanisms for its BWN training. Compensation Service training officials said they determined the design of training and how it would be delivered based on the importance and complexity of the BWN processing tasks, among other factors. For example, for those needing situational awareness, officials determined that an online training was appropriate because every claims processor would need high-level information about BWN claims. The delivery mechanism differed across the courses offered (see table 1).

Table 1: Blue Water Navy (BWN) Training Courses by Role, Delivery Mode, and Length

Course	Role	Training delivery mode	Length
Initial Training	All claims processors	Online, recorded	1.5 hours
Centralized Processing Development Training	BWN Veterans Service Representatives	Online, recorded	1.5 hours
Rating Processing	BWN Rating Veterans Service Representatives	Live, instructor-led; recorded for future use	3 hours
Blue Water Navy: Records Research Specialist	Records Research Specialists	Live, instructor-led	2 hours
Ship Locator Dashboard	Eight BWN regional office claims processors	Online; recorded for future use	.5 hours

Source: GAO analysis of VBA documents. | GAO-21-348

Specifically, three of the five BWN training courses were pre-recorded only, two were instructor-led. Trainings were recorded for use as new claims processors were assigned. Although VBA had some criteria it used to determine training delivery mechanisms, these criteria were not documented.

Training Implementation	VBA partially applied selected leading practices to implement training for BWN claims processing. Specifically, the agency collected some implementation data, including trainee feedback surveys and assessment data. It also collected some feedback from its managers, including regional offices handling BWN claims. However, our prior work on assessing training efforts in the federal government states that when implementing training, an agency should provide useful tools to reinforce new behaviors, among other practices.[52] We found that VBA provided numerous job aids for BWN claims processors to support BWN training, but in some instances, access to these job aids was not timely. Key job aids for processing BWN claims were included in the M21-1 claims adjudication procedures manual, as well as the BWN Standard Operating Procedures, and a VBA policy letter. In some cases, claims processors received delayed access to these job aids or found them too numerous to be helpful. For example, the VBA policy letter explaining how BWN claims would be processed was issued after training began in early December 2019. Regional office managers we interviewed said that having the policy before or at the same time as training would have been helpful. One claims processor also told us they did not receive timely access to key guidance (such as the SharePoint site with FAQs and other resources). Regional office managers said these resources were initially only available to managers. In addition, some claims processors expressed concern and confusion about the numerous sources they needed to search to find the most updated information.
Training Effectiveness	VBA partially applied leading practices to assess the effectiveness of BWN training. Agency officials said that a monthly quality review of BWN claims processed was part of their effort to assess the effectiveness of the BWN training. Leading practices for training evaluation call for using data, such as productivity, quality (for example, number of errors per number of claims processed), and time or feedback on training courses to assess the results achieved through training.[53] Compensation Service Quality Assurance staff conducted a special focused review of 104 BWN claims in January 2020 to assess the efficacy of the training. They continued these special focused reviews each month. Quality Assurance staff said that most errors were associated with general rating skills rather than BWN-specific errors. For example, according to Quality Assurance reports from March 2020, when looking at errors specific to the new BWN law and procedures, the accuracy percentage was 96.4 percent for the

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[52]GAO-04-546G, 47.

[53]GAO-04-546G, 65.

104 claims reviewed. However, when looking at all errors for these same 104 claims, the accuracy percentage (as identified by the special focused review) dropped to 85.6 percent.

Compensation Service quality assurance staff and regional office staff told us BWN claims processors have received feedback on identified BWN-specific errors. Quality assurance staff reported quality findings from the monthly reviews to BWN claims processors via teleconference. The teleconference also included sharing best practices from the offices processing these claims. For example, one best practice was to conduct in-process reviews of all claims, as well as second signature reviews of all denied claims.

However, officials in Compensation Service stated they have not analyzed feedback from BWN training courses or otherwise evaluated this training effort against the goals they established. They stated that BWN training has not been evaluated because evaluation efforts related to BWN training will be part of the overall training evaluation plan under development. Compensation Service is in the beginning stages of developing evaluation plans for disability claims processor training.

VBA Does Not Plan to Collect and Share Lessons Learned for Use in Similar, Future Training Efforts

Although VBA plans to evaluate its training, including the BWN training effort, the agency has not formally reviewed its implementation of or assessed feedback on the BWN training effort, contrary to leading practices. Officials stated the informal feedback on the BWN training effort was positive. However, VBA could not provide a summary of the feedback, which officials said was provided informally, generally through email and online messages. A Compensation Service official said that they have not reviewed implementation data and feedback from BWN training because based on informal feedback received, they did not see a need for revising the BWN training courses. Officials stated they have not prepared a summary analysis of the feedback results from BWN training courses and had no plans to collect and share lessons learned from the BWN training effort.

Claims processors in two regional offices who participated in our site visit discussion groups and interviews identified positive aspects of the BWN training and concerns, in addition to areas where additional training may be needed.

- In discussion groups, claims processors had some positive feedback on the training. For example, a claims processor who had live training commented that their BWN course instructors were knowledgeable

and able to answer questions during the session. Other claims processors said that the training provided was an appropriate overview of how BWN claims would be processed and their role.

- Claims processors also raised some concerns about the training. For example, claims processors in one discussion group noted that raters may still be confused about BWN supplemental claims. For example, a veteran may want to submit a supplemental claim on a current claim. If a rater incorrectly says the veteran submitted the wrong form, the rater has to spend more time revising the claim type and claim. Claims processors noted that one such error can create a snowball effect that can lead to denials and appealed disability claims. Some claims processors indicated that the ship locator tool, used to verify herbicide exposure, is an area where additional clarification is needed.

Although VBA officials said they had no plans to collect and share lessons learned on BWN training, an official acknowledged that such feedback could be helpful in future, similar situations. Leading practices state that agencies can often learn much from an assessment of performance data and feedback from previous experiences.[54] Officials stated that Compensation Service training staff have internally discussed the BWN training effort. However, perspectives from other offices could be relevant. For example, officials noted that their efforts to track completion of BWN training were greatly enhanced by coordinating with OTM. Collecting, analyzing, and sharing lessons learned from implementing this training, through either positive or negative experiences, could be applied in the future. For example, managers from one regional office said that the Blue Water Navy Vietnam Veterans Act of 2019 involved major changes to claims processing. When these types of major changes occur, VBA and regional offices often make adjustments as they implement the process. These managers said that planning for possible issues and risks before implementation could be helpful.

VBA officials acknowledged that legislative changes can necessitate additional training, such as with appeals modernization. In past years VBA has implemented training in response to court decisions and legislative changes, such as on military sexual trauma and Agent Orange

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[54]GAO-04-546G, 20.

exposure.[55] More recently, Congress has passed legislation that made changes to eligibility for disability compensation benefits, and such changes could necessitate training for claims processors on expedited timeframes.[56] Without collecting, analyzing, and sharing information on what worked well, and what could be improved, VBA may miss opportunities to efficiently develop and implement contingency plans to address rapid upsurges in demand for training.[57]

Conclusions

As VBA hires more disability claims processors and implements new initiatives, VBA's ability to effectively manage its training program is a key to achieving its mission and goals. However, VBA has not fully applied a wide range of leading practices for managing its training. VBA officials described several challenges to fully applying the leading practices, particularly related to strategy and documentation, including higher priorities and the frequency with which the agency is tasked with urgent or emerging training needs. VBA also stated that it has some structures and specific individual strategies to guide training. Nevertheless, establishing and documenting performance goals, a governance structure, and a plan or strategy and applying other leading practices, such as establishing processes to comprehensively collect and incorporate stakeholder feedback, would provide a basis to evaluate whether training is achieving VBA goals.

In addition, establishing policies and processes that set minimum training requirements for instructors and that detail VBA offices' responsibilities for monitoring would help ensure claims processors receive quality instruction and complete their annual regional office-selected training hours. Moreover, collecting and using comprehensive stakeholder feedback and conducting recurring evaluations could help VBA become more fully aware of how training affects claims processor performance or

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[55]See for example, GAO, *Military Sexual Trauma: Improvements Made, but VA Can Do More to Track and Improve the Consistency of Disability Claim Decisions*, GAO-14-477 (Washington, D.C.: June 9, 2014).

[56]For example, the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 includes a provision to add three conditions (parkinsonism, bladder cancer and hypothyroidism) to the list of those presumed to be service connected for certain veterans who served in Vietnam. Pub. L. No. 116-283, § 9109, 134 Stat. 3388, 4785 (2021).

[57]GAO-04-546G. In addition, our previous work on lessons learned could be helpful. See, for example, GAO, *Project Management: DOE and NNSA Should Improve Their Lessons-Learned Process for Capital Asset Projects*, GAO-19-25 (Washington, D.C.: Dec. 21, 2018), in which we identified key lessons-learned practices for program and project management based on our prior reports on lessons learned.

practical improvements to enhance individual and, ultimately, organizational performance. Finally, collecting, analyzing, and sharing lessons learned from the Blue Water Navy training effort could position VBA to efficiently plan and implement training to meet similar, emerging demands in the future. Absent such an overall strategic approach, VBA may not have reasonable assurance that training for its nearly 10,000 claims processors results in better service to veterans with disabilities.

Recommendations for Executive Action

We are making the following ten recommendations to VA:

The Under Secretary for Benefits should establish performance goals for VBA's training program for disability claims processors. These program-level goals should have specific targets to provide a basis for comparing actual program performance with expected results. (Recommendation 1)

The Under Secretary for Benefits should establish a governance structure that identifies clear lines of authority among the VBA offices responsible for guiding strategic training efforts and establishing clear accountability for the success of these efforts. (Recommendation 2)

The Undersecretary for Benefits should develop and document an integrated and comprehensive training plan or strategy for its program for training disability claims processors. The plan should align training program goals with VBA goals and document how program activities will be prioritized to meet goals. (Recommendation 3)

The Undersecretary for Benefits should document and use criteria to guide analysis for when a given training delivery mechanism should be used. Goals for the training program could be helpful in determining the appropriate criteria. (Recommendation 4)

The Undersecretary for Benefits should establish and monitor minimum training requirements to prepare all course instructors at regional offices to conduct claims processor training. (Recommendation 5)

The Undersecretary for Benefits should develop and implement a policy detailing VBA offices' responsibilities to identify and address any deficiencies in claims processors' completion of annual regional office-selected training hours. (Recommendation 6)

The Undersecretary for Benefits should develop and document a policy and related processes for collecting and incorporating feedback from relevant stakeholders on the strengths and weaknesses of its claims

processor training program. This effort could be completed independently or as part of VBA's evaluation planning efforts for disability claims processor training. (Recommendation 7)

The Undersecretary for Benefits should ensure that Compensation Service completes and implements a plan to evaluate training of disability claims processors that aligns with leading practices, such as those outlined in VBA's strategy for evaluating training. (Recommendation 8)

The Undersecretary for Benefits should establish a policy to help ensure recurring training evaluation efforts that align with leading practices, such as those outlined in VBA's strategy for evaluating training. (Recommendation 9)

The Undersecretary for Benefits should collect, analyze, and share lessons learned from the Blue Water Navy training effort with internal stakeholders, including those from offices responsible for training. (Recommendation 10)

Agency Comments and Our Evaluation

We provided a draft of this report to VA for comment. In its comments, reproduced in appendix II, VA generally agreed with our findings and concurred with our recommendations. VA also provided general comments as part of its comment letter, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to relevant congressional committees, the Secretary of Veterans Affairs, and other interested parties. In addition, the report will be available at no charge on the GAO website at https://www.gao.gov.

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

Sincerely yours,

Elizabeth H. Curda
Director, Education, Workforce, and Income Security

Appendix I: Selection of Relevant Leading Practices for Assessing Training

To assess Veterans Benefits Administration's (VBA) training efforts, we relied on our prior work that presents a framework of leading practices of effective training and development programs organized into four components of the training process: planning and front-end analysis, design and development, implementation, and evaluation.[1] We selected leading practices that were relevant to our review of training applicable to all disability compensation claims processors. Specifically, we omitted those practices that focused on performance management, including selection of staff for external or specialized training opportunities, and purchase of training. Table 1 provides an overview of our assessment of how VBA's training for claims processors applied the relevant leading practices we identified from each of the four components of the training process and their respective questions. Leading practices discussed in the report have been edited or paraphrased to improve readability.

Table 2: GAO Assessment of VBA Claims Processor Training against Relevant Leading Practices for Training

Leading practice	GAO assessment
Planning: partially applied	
Does the agency have training goals and related performance measures that are consistent with its overall mission, goals, and culture?	○
To what extent do the agency's strategic and annual performance planning processes incorporate human capital professionals in partnership with agency leadership and other stakeholders in addressing agency priorities, including training and development efforts?	◑
How does the agency determine the skills and competencies its workforce needs to achieve current, emerging, and future agency goals and missions and identify gaps, including those that training and development strategies can help address?	◑
How does the agency identify the appropriate level of investment to provide for training and development efforts and prioritize funding so that the most important training needs are addressed first?	○
What measures does the agency use in assessing the contributions that training and development efforts make toward individual mastery of learning and achieving agency goals?	◑
How does the agency incorporate employees' developmental goals in its planning processes?	○
How does the agency integrate the need for continuous and lifelong learning into its planning processes?	◑
Does the agency consider governmentwide reforms and other targeted initiatives to improve management and performance when planning its training and development programs?	◑
Does the agency have a formal process to ensure that strategic and tactical changes are promptly incorporated in training and development efforts as well as other human capital strategies as needed?	●

[1]GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government,* GAO-04-546G (Washington, D.C.: Mar. 1, 2004).

Leading practice	GAO assessment
Design/Development: partially applied	
What steps does the agency take to ensure that training is connected to improving individual and agency performance in achieving specific results?	◑
Does the agency use the most appropriate mix of centralized and decentralized approaches for its training and development programs?	●
How does the agency compare the merits of different delivery mechanisms (such as classroom or computer-based training) and determine what mix of mechanisms to use to ensure efficient and cost-effective delivery?	◑
Does the agency determine a targeted level of improved performance in order to ensure that the cost of a training or development program is appropriate to achieve the anticipated benefit?	○
How well does the agency incorporate measures of effectiveness into courses it designs?	◑
Implementation: partially applied	
What steps do agency leaders take to communicate the importance of training and developing employees, and their expectations for training and development programs to achieve results?	◑
Is there a training and performance organization that is held accountable, along with the line executives, for the maximum performance of the workforce?	◑
Are agency managers responsible for reinforcing new behaviors, providing useful tools, and identifying and removing barriers to help employees implement learned behaviors on the job?	◑
Does the agency take actions to foster an environment conducive to effective training and development?	◑
What steps does the agency take to encourage employees to buy in to the goals of training and development efforts, so that they participate fully and apply new knowledge and skills when doing their work?	◑
Does the agency collect data during implementation to ensure feedback on its training and development programs?	◑
Evaluation: partially applied	
To what extent does the agency systematically plan for and evaluate the effectiveness of its training and development efforts?	◑
Does the agency use the appropriate analytical approaches to assess its training and development programs?	◑
What performance data (including qualitative and quantitative measures) does the agency use to assess the results achieved through training and development efforts?	○
How does the agency incorporate evaluation feedback into the planning, design, and implementation of its training and development efforts?	◑
Does the agency incorporate different perspectives (including those of line managers and staff, customers, and experts in areas such as financial, information, and human capital management) in assessing the impact of training on performance?	◑
How does the agency track the cost and delivery of its training and development programs?	●
How does the agency assess the benefits achieved through training and development programs?	○
Does the agency compare its training investments, methods, or outcomes with those of other organizations to identify innovative approaches or lessons learned?	○

Legend: ● = Generally Applied; ◑ = Partially Applied; ○ = Not Applied

Source: GAO analysis of VBA training documents and interviews with VBA officials and GAO-04-546G. | GAO-21-348

For our assessment of VBA's Blue Water Navy training, we selected practices that we determined were relevant based on their applicability to a targeted, time-limited training effort. Table 2 presents our assessment of Blue Water Navy training against these practices. Leading practices discussed in the report have been edited or paraphrased to improve readability.

Table 3: GAO Assessment of Blue Water Navy Training Efforts against Relevant Leading Practices for Training

Leading practice	GAO assessment
Planning: Generally Applied	
How does the agency determine the skills and competencies its workforce needs to achieve current, emerging, and future agency goals and missions and identify gaps, including those that training and development strategies can help address?	●
Does the agency consider governmentwide reforms and other targeted initiatives to improve management and performance when planning its training and development programs?	●
Does the agency have a formal process to ensure that strategic and tactical changes are promptly incorporated in training and development efforts as well as other human capital strategies as needed?	●
Design/Development: partially applied	
What steps does the agency take to ensure that training is connected to improving individual and agency performance in achieving specific results?	◐
How does the agency compare the merits of different delivery mechanisms (such as classroom or computer-based training) and determine what mix of mechanisms to use to ensure efficient and cost-effective delivery?	◐
How well does the agency incorporate measures of effectiveness into courses it designs?	●
Implementation: partially applied	
Are agency managers responsible for reinforcing new behaviors, providing useful tools, and identifying and removing barriers to help employees implement learned behaviors on the job?	◐
Does the agency collect data during implementation to ensure feedback on its training and development programs?	◐
Evaluation: partially applied	
What performance data (including qualitative and quantitative measures) does the agency use to assess the results achieved through training and development efforts?	◐
How does the agency incorporate evaluation feedback into the planning, design, and implementation of its training and development efforts?	○
Does the agency incorporate different perspectives (including those of line managers and staff, customers, and experts in areas such as financial, information, and human capital management) in assessing the impact of training on performance?	○

Legend: ● = Generally Applied; ◐ = Partially Applied; ○ = Not Applied

Source: GAO analysis of VBA training documents and interviews with VBA officials and GAO-04-546G. | GAO-21-348

DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON

May 13, 2021

Ms. Elizabeth Curda
Director
Education, Workforce
  and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Curda:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: *VA DISABILITY BENEFITS: Veterans Benefits Administration Could Enhance Management of Claims Processor Training* (GAO-21-348).

The enclosure contains general comments and the actions to be taken to address the draft report recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,

Tanya Bradsher
Chief of Staff

Enclosure

ENCLOSURE

The Department of Veterans Affairs (VA) Response to the
Government Accountability Office (GAO) Draft Report
*VA DISABILITY BENEFITS: Veterans Benefits Administration Could Enhance
Management of Claims Processor Training*
(GAO-21-348).

Recommendation 1: **The Undersecretary for Benefits should establish
performance goals for VBA's training program for disability claims processors.
These program-level goals should have specific targets to provide a basis for
comparing actual program performance with expected results.**

VA Response: Concur. The Veterans benefits Administration (VBA) will establish
program-level goals with specific targets to provide a basis for comparing actual
program performance with expected results.

Target Completion Date: March 31, 2022.

Recommendation 2: **The Undersecretary for Benefits should establish a
governance structure that identifies clear lines of authority among the VBA
offices responsible for guiding strategic training efforts and establishing clear
accountability for the success of these efforts.**

VA Response: Concur in principle. VBA will document the appropriate structure for
lines of authority and responsibility related to VBA's disability claims processor training.

Target Completion Date: March 31, 2022.

Recommendation 3: **The Undersecretary for Benefits should develop and
document an integrated and comprehensive training plan or strategy for its
program for training disability claims processors. The plan should align training
program goals with VBA goals and document how program activities will be
prioritized to meet goals.**

VA Response: Concur. VBA will develop and document a comprehensive training plan
for disability claims processors in alignment with Recommendation 1.

Target Completion Date: March 31, 2022.

Recommendation 4: **The Undersecretary for Benefits should document and use
criteria to guide analysis for when a given training delivery mechanism should be
used. Goals for the training program could be helpful in determining the
appropriate criteria.**

VA Response: Concur. VBA will formally document the established criteria that guides
analysis for determining training delivery mechanisms.

Target Completion Date: September 30, 2021.

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Recommendation 5: The Undersecretary for Benefits should establish and monitor minimum training requirements to prepare all course instructors at regional offices to conduct claims processor training.

VA Response: Concur. VBA will establish minimum training requirements for regional office (RO) instructors.

Target Completion Date: March 31, 2022.

Recommendation 6: The Undersecretary for Benefits should develop and implement a policy detailing VBA offices' responsibilities to identify and address any deficiencies in claims processors' completion of annual regional office-selected training hours.

VA Response: Concur. VBA will establish standard operating procedures (SOP) to identify and address claim processors' training completion deficiencies in completion of annual RO-selected training hours.

Target Completion Date: March 31, 2022.

Recommendation 7: The Undersecretary for Benefits should develop and document a policy and related processes for collecting and incorporating feedback from relevant stakeholders on the strengths and weaknesses of its claims processor training program. This effort could be completed independently or as part of VBA's evaluation planning efforts for disability claims processor training.

VA Response: Concur. The comprehensive training plain developed in response to Recommendation 3 will include a process for collecting and incorporating feedback from relevant stakeholders.

Target Completion Date: March 31, 2022.

Recommendation 8: The Undersecretary for Benefits should ensure that Compensation Service completes and implements a plan to evaluate training of disability claims processors that aligns with leading practices, such as those outlined in VBA's strategy for evaluating training.

VA Response: Concur. Compensation Service will continue to work with VBA's Office of Talent Management (OTM) to finalize training evaluation plans on all disability claims processor training programs.

Target Completion Date: September 30, 2021.

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<u>Recommendation 9</u>**: The Undersecretary for Benefits should establish a policy to
help ensure recurring training evaluation efforts that align with leading practices,
such as those outlined in VBA's strategy for evaluation training.**

<u>VA Response:</u> Concur. VBA will establish a policy to ensure recurring training
evaluation efforts align with leading practices.

Target Completion Date: September 30, 2021.

<u>Recommendation 10</u>**: The Undersecretary for Benefits should collect, analyze,
and share lessons learned from the Blue Water training effort with internal
stakeholders, including those from offices responsible for training.**

<u>VA Response:</u> Concur. VBA will share lessons learned from the Blue Water Navy
(BWN) training effort with internal stakeholders.

Target Completion Date: September 30, 2021.

<u>General Comments</u>

On page 7, the section of the GAO report titled "VBA's Planning and Process for
Designating Training Partially Applied Leading Practices for Training" – VBA notes that
the Administration is working to create a comprehensive training strategy for ongoing
training needs; however, they are often faced with unique situations such as changes in
legislation, regulation and procedures. To meet the tight deadlines that often
accompany these requests, VBA employs agile practices which may include a project-
by-project approach. While VBA appreciates GAO's assessment that a more
comprehensive training plan would be beneficial, we will continue to encounter
situations that require a project specific approach outside of the normal training plan.

**Department of Veterans Affairs
May 2021**

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Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact	Elizabeth H. Curda at (202) 512-7215 or curdae@gao.gov
Staff Acknowledgements	In addition to the contact named above, James Whitcomb (Assistant Director), Dana Hopings (Analyst-in-Charge), and Brittaini Maul made key contributions to this report. Also contributing to this report were Kirstin Austin, Mindy Bowman, Cliff Douglas, Alex Galuten, Yvonne Jones, David Moser, Stacy Ouellette, Monica Savoy, Lauren Shaman, Almeta Spencer, Curtia Taylor, Kathleen Van Gelder, and Adam Wendel.