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Testimony

Before the Subcommittee on Disability Assistance and Memorial Affairs,
Committee on Veterans' Affairs, House of Representatives

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VETERANS' BENEFITS

**Training for Experienced
Disability Claims
Processors**

Statement of Daniel Bertoni, Director
Education, Workforce, and Income Security



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Highlights of [GAO-10-1029T](#), a testimony to the Subcommittee on Disability Assistance and Memorial Affairs, Committee on Veterans' Affairs, House of Representatives

Why GAO Did This Study

GAO was asked to present its views on the training requirements and procedures for VA personnel responsible for processing compensation and pension claims. This statement is based primarily upon an April 2010 GAO report on VA's training for experienced disability claims processors ([GAO-10-445](#)) and includes information on actions VBA says it has taken in response to our recommendations. This statement focuses on (1) experienced disability claims processors' views regarding training, and (2) VBA's efforts to monitor and assess training for experienced disability claims processors.

What GAO Recommends

In its April report, GAO recommended that VBA (1) adopt procedures for routinely monitoring and ensuring compliance with annual training requirements, including more fully using its Web-based learning management system to ensure training requirements are met, (2) develop clear written guidance on the types of activities all regional offices should and should not count toward completion of annual training requirements, and (3) develop and implement a written strategy for systematically assessing the appropriateness of the training regional offices provide to experienced claims processors. VA concurred with these recommendations and has taken some actions in response.

View [GAO-10-1029T](#) or [key components](#).
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Training for Experienced Disability Claims Processors

What GAO Found

Experienced claims processors had concerns about the amount of training they were required to complete and their ability to meet that requirement. In addition, they had mixed views on the amount of training received on specific topics, the way in which training was delivered and the timing of training. GAO's survey results indicated that 60 percent of experienced claims processors found it difficult to meet the 80 hour annual training requirement given their workload. In addition, based on its survey, GAO estimates that 45 percent of supervisors of experienced Rating Veterans Service Representatives (RVS) and 53 percent of supervisors of experienced Veterans Service Representatives (VSR) thought that only some or few, if any, of the experienced staff they supervise need 80 hours of training annually to perform their job duties effectively.

Many experienced staff also thought they received too little training on some topics and too much on others. For example, 47 percent thought they received less training than needed in how to develop appeals and remands and 34 percent thought they received more than enough training on records management. Finally, opinions varied on how helpful the various modes of training were. Nearly all claims processors, in general, considered on-the-job experience to be the method of training best suited to their needs. An estimated 39 percent of all experienced claims processors, in general, felt that the training they received was delivered too late, suggesting that regional offices may not always deliver the training needed by experienced claims processors in a timely manner.

According to *Standards for Internal Control in the Federal Government*, federal agencies must have control mechanisms in place to help ensure that all employees receive appropriate and consistent training. Under its current annual training requirements, VBA delegates considerable responsibility for training experienced claims processors to each of its 57 regional offices. In particular, regional offices are responsible for ensuring that claims processors complete annual training requirements. Each office also determines what topics are covered for half of the required training hours, what material to provide on each of these topics, and how and when the training should occur. Regional offices also have considerable discretion in determining what activities qualify as training. However, at the time of GAO's review, VBA lacked controls to ensure that regional offices deliver required training and record completed training in a consistent manner, and did little to assess the appropriateness or consistency of all training for experienced claims processors. During the course of our review and in response to our recommendations, VBA has taken steps to improve its monitoring and assessment of training. VBA reports that they are developing guidance on what activities qualify as training, have begun to require staff to complete course evaluations for some training and are exploring the feasibility of requiring evaluations for all training.

Mr. Chairman and Members of the Subcommittee:

I am pleased to have the opportunity to comment on training for Veterans Benefits Administration (VBA) disability claims processors. In fiscal year 2009, the Department of Veterans Affairs (VA) paid about \$44 billion to about 4 million veterans and their survivors through its disability compensation and pension programs. For years, the claims process has been the subject of concern and attention by VA, the Congress, and veterans service organizations due, in large part, to long waits for decisions, large numbers of pending claims, and problems with the consistency of decisions. To help VBA manage its increasing workload and replace the growing number of experienced claims processors who are retiring, the Congress provided funding which enabled VBA to hire several thousand new staff from fiscal year 2005 through fiscal year 2010. However, more staff alone will not guarantee effective disability claims processing. To ensure that decisions in disability compensation and pension cases are accurate, consistent, and timely, training must enable claims processors to become fully proficient and maintain their knowledge and skills.

In 2008 we reported that VBA's centralized training for new claims processors appeared well designed but that some claims processors had raised concerns about implementation.¹ VBA has since evaluated its training for new claims processors and made changes based upon that evaluation. In April 2010, we again reported on VBA's training as mandated in the Veterans' Benefits Improvement Act of 2008.² We recommended improved monitoring of annual training requirements, standardized recording of training taken, and a review of course content and timing for experienced claims processors. My remarks today will focus on 1) experienced disability claims processors' views regarding training, and 2) VBA's efforts to monitor and assess their training. This statement is drawn primarily from our April 2010 report, where we obtained information on the training, experience, and views of a nationally representative sample of claims processing staff. We also interviewed VBA headquarters officials and managers and training coordinators in four regional offices—Little

¹See 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).

²See GAO, *Veteran's Disability Benefits: Expanded Oversight Would Improve Training for Experienced Claims Processors*, [GAO-10-445](#) (Washington, D.C.: April 30, 2010).

Rock, Arkansas; Denver, Colorado; St. Petersburg, Florida; and White River Junction, Vermont. Our work was conducted 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

To process claims accurately, consistently, and in a timely manner, Veterans Service Representatives (VSR) and Rating Veterans Service Representatives (RVSR) must perform a complex set of tasks. When a claim is received, a VSR reviews it and assists the veteran in gathering the evidence, or documentation, needed to support it. The RVSR then evaluates the evidence to determine whether the claimant's medical condition(s) constitutes a disability, and assigns a disability percentage rating which determines the amount of benefits the veteran is eligible to receive. Finally a VSR calculates the amount of monthly benefit payments. VSRs and RVSRs also perform follow-up reviews if, for example, there is evidence a claimant's medical condition has changed, or a court determines that a claim was incorrectly denied.

To ensure that VSRs and RVSRs develop and maintain the knowledge and skills needed to process disability claims accurately, consistently, and in a timely manner, VBA has established annual training requirements and developed a structured training program, called "Challenge," for newly-hired or promoted claims processors.³ Beginning in fiscal year 2010, claims processors must receive 80 hours of training annually in topics directly related to processing disability claims.⁴ VBA requires that 40 of those hours be in topics designated by VBA, 20 cover topics selected by

³Challenge consists of a uniform curriculum that is implemented in three phases: initial orientation training provided at a participant's regional office, centralized classroom instruction typically delivered at VBA's Training Academy in Baltimore, Md., and comprehensive on-the-job and classroom training that new claims processors receive at their regional offices.

⁴The 80 hour annual training requirement is for RVSRs and VSRs who have completed the Challenge training program and/or have been in their position for six months.

each regional office from a list of core technical training requirements (CTTR), and 20 cover topics determined by each regional office.⁵

In addition to its “Challenge” program and annual training requirements, VBA issues “Fast Letters,” or memoranda on policy changes, conducts telephone conferences, and develops ad hoc required training on emerging issues to help ensure that disability claims processors have the information they need to do their job. VBA issued 100 Fast Letters in calendar years 2008 and 2009, on topics ranging from cost-of-living adjustments in disability benefits to rating the effects of traumatic brain injury (TBI). Monthly or quarterly telephone conferences with regional offices concentrate on claims processing issues identified through VBA’s quality reviews or on new management priorities or initiatives that may affect how claims processors do their jobs. VBA officials also told us the agency periodically requires training on emerging topics such as rating post-traumatic stress disorder (PTSD) and spinal, neck, and joint injuries.

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

Experienced staff responding to our survey expressed concerns with the amount of training they were required to take and their ability to meet those requirements. Based on the results of our survey of claims processors, many believed that 80 training hours each year were too many, particularly for experienced staff.⁶ An estimated 45 percent of supervisors of experienced RVSRs and 53 percent of supervisors of experienced VSRs thought that only some or few, if any, of the experienced staff they supervise need 80 hours of training. Most of the regional office officials we interviewed also said 80 hours are too many for at least some experienced staff and one regional official told us it would make sense to vary the required number of hours based on the training needs of individual claims processors.⁷ In 2008 we recommended that VBA collect and review feedback from staff to determine if the 80-hour training requirement was appropriate for all VSRs and RVSRs. VBA has not yet implemented this recommendation.

⁵At the time of our survey VBA did not designate the 40 hours of required training.

⁶Unless otherwise indicated, the margin of error for estimates based on this survey cited in this report are within plus or minus 15 percentage points at the 95 percent confidence level.

⁷An 80-hour annual training requirement may be appropriate for some, in particular new staff. An estimated 70 percent (ranging from 52 to 84 percent at a 95 percent confidence level) of all supervisors of new RVSRs and 62 percent of supervisors of new VSRs thought that all or almost all of the new staff they supervise needed 80 hours of training.

Our survey results also indicated that it was challenging for many experienced claims processors, in general, to meet the 80-hour annual training requirement, given their workload. Sixty percent found it somewhat or very difficult to meet the requirement. Moreover, 61 percent of experienced RVSRs' supervisors and 76 percent of experienced VSRs' supervisors thought it was somewhat or very difficult for experienced staff to complete 80 hours of training each year.

While many experienced claims processors thought that 80 hours of training per year was too much and difficult to complete, they had mixed views on the amount of training they received on specific topics. For example, an estimated 47 percent thought they received less than sufficient training in developing appeals and remands, and 42 percent thought they received less than needed in how to rate claims involving special monthly compensation. On the other hand, in each case, about one-third thought they received more than enough training in records management, rating disability compensation claims, and calculating payment amounts based on disability ratings.

Experienced claims processors' views on the helpfulness of various training modes and the timing of training also varied. Training for disability claims processors can be delivered in a number of ways: formal classroom training, online instruction, and video or satellite conferences. Claims processors can access online training courses through VBA's Training Performance Support System (TPSS), and learning resources such as VBA training materials, published guidance, and technical information are available to them on VBA's internal Web site. Regional offices also provide claims processors with individual coaching and mentoring, and may hold weekly meetings for claims processing teams.

Based on our survey results, experienced claims processors, in general, found certain training modes and learning resources more helpful than others. Nearly all thought that on-the-job experience, to a great or very great extent, helped them learn what they needed to know to perform their jobs. However, only about 20 percent indicated TPSS and other online training, and video or satellite training had, to a great or very great extent, helped them become familiar with even the basic information needed to handle claims.

Survey results also indicated that regional offices do not always deliver necessary training in a timely manner. An estimated 39 percent of all experienced claims processors felt that the formal training, in general, they received in the last 12 months was delivered too late to help them

effectively perform their job duties. For example, although the regulation governing ratings decisions on the effects of traumatic brain injury (TBI) was changed in October 2008,⁸ one RVSR wrote in a comment to the survey that, “TBI training is not projected to come out until [2010.]”⁹ Another wrote that introductory leadership training was not received until two years after a promotion to a supervisory position.

VBA Did Little to Systematically Monitor or Assess Training for Experienced Claims Processors but Has Begun to Take Steps to Do So

VBA headquarters does not ensure that experienced claims processors receive all required training. It is important for federal agencies to have mechanisms in place to ensure their employees actually receive required training and we have reported in the past that tracking the actual receipt of required training calls for reliable data from a comprehensive learning management system.¹⁰ While each regional office is responsible for recording completed training hours for each claims processor in VA’s Web-based Learning Management System (LMS), VBA officials told us that VBA headquarters did not use it to centrally monitor the specific types of training individual claims processors have completed. Based on our survey results, we found some claims processors did not receive training they should have. An estimated 24 percent of all RVSRs with more than one year of experience, who should have received mandatory training on rating spinal, neck, and joint injuries, never did.¹¹ To improve VBA headquarters’ ability to systematically monitor regional office compliance with its annual training requirements, we recommended that it adopt procedures to routinely do so, including more fully utilizing its LMS to ensure that claims processors received required CTTR and ad hoc training on emerging issues. In their comments to our report, VBA noted that it had begun to use LMS to determine what percentage of claims processors at each office were meeting annual training requirements. However, it is not clear if they are tracking whether staff receive required CTTR training or

⁸73 Fed. Reg. 54,693 (September 23, 2008)

⁹A presentation on TBI was available on VBA’s Intranet site.

¹⁰See GAO, Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government, [GAO-04-546G](#) (Washington, D.C.: March 2004)

¹¹This training, delivered in September 2008, was undertaken to clarify requirements resulting from *DeLuca v. Brown*, 8 Vet. App. 202 (1995), in which the court held that under federal regulations defining joint and spine impairment severity in terms of limits on range of motion, VA claims adjudicators must consider whether range of motion is further limited by factors such as pain and fatigue during “flare-ups” or following repetitive use of the impaired joint or spine.

ad hoc training on emerging issues such as the training on rating spinal, neck, and joint injuries.

In addition, we found that VBA lacked controls to ensure that regional offices record completed training in a consistent manner. Each regional office has considerable discretion in determining what activities qualify as training and we noted that they were not all defining training consistently. For example, some regions counted the time claims processors spent reading “Fast Letters” as training while others did not. This raises questions about the reliability of the data that regional offices enter into the LMS. We recommended that VBA develop clear written guidance on the types of activities all regional offices should and should not count toward completion of annual training requirements. According to VBA, the agency is developing such criteria and expects to complete this process by September 30, 2010.

VBA also has not systematically assessed the appropriateness or consistency of training regional offices provide to experienced claims processors. In prior work, we have noted that federal agencies should have mechanisms in place to ensure that training for employees is appropriate and consistent.¹² However, we found that VBA did little to determine if all regional offices provide training to experienced claims processors that 1) covers topics relevant to what they do; 2) helps them do their job; 3) is delivered in the most useful and efficient way; and 4) is provided when needed.

In the past, VBA has evaluated some mandatory training to improve the consistency of ratings, assessed training for newly-hired claims processors, and solicited feedback from staff on TPSS. VBA officials told us that teams from VBA headquarters also periodically visit regional offices to monitor their compliance with VBA policies and procedures. Since July 2009, such visits have included a training specialist responsible for reviewing some aspects of training in the regional office, such as training records and materials, and whether new claims processors have completed the last phase of Challenge Training at their regional office. Although examining some aspects of training for claims processors during these visits may provide VBA with some information on the appropriateness and consistency of training, each office is only visited about once every three years.

¹²See [GAO-04-546G](#).

Finally, VBA has not yet systematically collected feedback from experienced claims processors on training received at the regional offices even though feedback from training participants, supervisors, instructors and other stakeholders can provide agencies with valuable information to assess the appropriateness and consistency of their training. VBA recently developed a training evaluation tool that all VSRs and RVSRS are required to complete, but only for CTTR courses. As a result, we recommended that VBA develop and implement a written strategy to systematically assess the appropriateness (content, mode and timing) of all training for experienced claims processors. Such a strategy should include a standardized approach for obtaining feedback from experienced claims processors and regional office managers and training coordinators. VBA says it is assessing the feasibility of requiring staff to complete an evaluation tool for all training and expects to complete this assessment by September 30, 2010.

Concluding Observations

Veterans who have been injured in service to their country deserve accurate and timely disability determinations. VBA claims processors perform a vital role in helping the nation respond to the needs of these veterans. Through its training program for claims processors, VBA can ensure that they develop and maintain the skills required to do their job efficiently and well. However, VBA could do more to monitor the training received by experienced claims processors. VBA cannot be sure all staff are receiving the type of training the agency believes is essential for success on the job. Furthermore, there are questions about the reliability of the training data regional offices record in VA's LMS. VBA has indicated that they are developing criteria to define the types of activities that should and should not count toward meeting training requirements. However, it is yet to be seen if this will result in consistent reporting of what counts as training by regional offices.

Furthermore, according to our survey, both experienced claims processors and their supervisors had a number of concerns regarding the training that experienced claims processors receive. Thus, it is important that VBA continue to explore options to assess the appropriateness of the training provided to staff.

Mr. Chairman, this concludes my prepared statement. I would be pleased to respond to any questions that you or other Members of the Subcommittee may have. Thank you.

GAO Contact and Staff Acknowledgments

For further information about this testimony, please contact Daniel Bertoni at (202) 512-7215 or bertonid@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this testimony. In addition to the contact named above, key contributors to this statement include Clarita Mrena, Martin Scire, Regina Santucci and Susan Aschoff.

Related GAO Products

Veterans' Disability Benefits: Expanded Oversight Would Improve Training for Experienced Claims Processors. [GAO-10-445](#). Washington, D.C.: April 30, 2010.

Veterans' Disability Benefits: Further Evaluation of Ongoing Initiatives Could Help Identify Effective Approaches for Improving Claims Processing. [GAO-10-213](#). Washington, D.C.: January 29, 2010.

Veterans' Disability Benefits: Preliminary Findings on Claims Processing Trends and Improvement Efforts. [GAO-09-910T](#). Washington, D.C.: July 29, 2009.

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.

Veterans' Benefits: Improvements Needed in VA's Training and Performance Management Systems. [GAO-08-1126T](#). Washington, D.C.: September 18, 2008.

Veterans' Disability Benefits: Claims Processing Challenges Persist, while VA Continues to Take Steps to Address Them. [GAO-08-473T](#). Washington, D.C.: February 14, 2008.

Veterans' Benefits: VA Needs Plan for Assessing Consistency of Decisions. [GAO-05-99](#). Washington, D.C.: November 19, 2004.

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

Veterans' Benefits: Improvements Needed in the Reporting and Use of Data on the Accuracy of Disability Claims Decisions. [GAO-03-1045](#). Washington, D.C.: September 30, 2003.

Veterans' Benefits: Training for Claims Processors Needs Evaluation. [GAO-01-601](#). Washington, D.C.: May 31, 2001.

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