



DEPARTMENT OF VETERANS AFFAIRS  
**OFFICE OF INSPECTOR GENERAL**

*Office of Audits and Evaluations*

VETERANS BENEFITS ADMINISTRATION

VBA Did Not Consistently  
Comply with Skills  
Certification Mandates for  
Compensation and Pension  
Claims Processors

REVIEW

REPORT #20-00421-63

MARCH 3, 2021



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## Executive Summary

In 2008, Congress passed a law mandating a skills certification test for appropriate VA employees and managers who process claims for compensation and pension benefits.<sup>1</sup> The law affected VA's Skills Certification Program, which was created in 2003 and already administered optional tests to measure claims processors' capacity to attain and apply the skills, knowledge, and abilities needed to be successful in their positions.

A 2012 law provided additional mandates.<sup>2</sup> The law required the VA Secretary to submit a plan outlining how the Veterans Benefits Administration (VBA) would implement the testing program, including remedial actions VBA would take if test takers did not pass.

The VA Office of Inspector General (OIG) conducted this review to determine how effectively VBA managers fulfilled the plan VA submitted to Congress for the Skills Certification Program and related criteria.<sup>3</sup> Specifically, the review team examined whether the program consistently

- assessed the skills and competencies of appropriate employees and managers who are responsible for processing claims for compensation and pension benefits,
- provided remedial training (or a training plan) to staff who failed the test,
- ensured all staff who failed tests were reassessed by taking the next scheduled test, and
- took personnel actions against all employees who failed consecutive tests after receiving remedial training.

### What the Review Found

The review team found that VBA did not meet the skills certification requirements outlined in the plan VA submitted to Congress in response to the 2012 law and other related skills certification test criteria from fiscal year (FY) 2016 through FY 2019 (the review period). Specifically, the team found that the Skills Certification Program did not regularly assess all appropriate staff; give all VBA staff and managers individual training plans or provide training to all those who failed the test; ensure all staff who failed a test took the next scheduled test; or take personnel actions against all staff and managers who failed consecutive tests after receiving remedial training as required.

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<sup>1</sup> Veterans' Benefits Improvement Act of 2008, Pub. L. No. 110-389, § 225 (2008).

<sup>2</sup> Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012, Pub. L. No. 112-154, § 703 (2012).

<sup>3</sup> Report to Congress, "Plan for Regular Assessment of Employees of the Veterans Benefits Administration Who Handle Processing of Claims for Compensation and Pension," [Pursuant to] Pub. L. No. 112-154, § 703, n.d.

The review team was informed by the executive director of VBA's Compensation Service that in August 2019, VBA decided not to renew the contract with the company that administered skills certification testing. VBA made this decision because the program was on pause due to feedback from the field about the efficacy of the tests. The executive director noted that VBA wanted to rework the skills certification requirements.

### **VBA Managers Did Not Regularly Assess Claims-Processing Skills for All Staff**

VBA managers did not assess all employees and supervisors whom they required to take the test. The OIG estimated from a statistical sample that from FY 2016 through FY 2019, 4,700 of 10,600 individuals required to take tests did not take at least one examination.<sup>4</sup> The OIG determined that several factors accounted for VBA not meeting the requirements. There was a lack of documented procedures for identifying individuals required to take tests and data limitations that made it difficult to track them, often resulting in inadequate advance notice to those required to take the test. VBA did not develop waiver criteria for supervisors to use when exempting their staff from participating in tests. In addition to the reasons that affected test takers' participation, VBA canceled testing due to special circumstances in FYs 2018 and 2019. In FY 2018, VBA's intranet site inadvertently denied employees access to required materials, and rescheduling would have resulted in cascading delays for FY 2018 program maintenance and updates. In FY 2019, VBA officials said they canceled tests and paused ongoing testing to assess its effectiveness based on feedback from the field. Moreover, the Compensation Service did not design tests for all employees and supervisors with claims-processing functions cited in the plan. A VBA executive director cited a lack of performance standards for certain employees as a hindrance in developing tests for their positions.

### **VBA Managers Did Not Provide Training Plans or Remedial Training to All Staff Who Failed the Test**

Based on its sample, the OIG estimated that from FY 2016 through FY 2019, approximately 1,900 of 2,500 employees who needed a training plan after failing a test did not receive one.<sup>5</sup> Training plans had not always been provided because some VBA managers were unaware of their responsibility to provide the plans until the Compensation Service sent a reminder in

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<sup>4</sup> Appendixes A and B contain details about the OIG review methodology.

<sup>5</sup> The VBA chief of training for the Skills Certification Program said VBA uses training plans to determine whether an employee has received training. Therefore, VBA provided documentation of training plans for the team to determine whether these employees and supervisors were provided training.

June 2018. The review team found that with additional VBA oversight of the Skills Certification Program, a greater percentage of employees received training plans by FY 2018.

### **VBA Managers Did Not Ensure All Staff Who Failed a Test Were Reassessed by Taking the Next Scheduled Test**

According to VBA's skills certification testing criteria, employees who are not successful on their first attempt at passing the skills certification test are required to take the next scheduled exam if they remain in the same positions. Applying this criterion, the OIG estimated that of approximately 2,500 VBA staff and managers who failed tests on their initial attempts, 770 did not take the next scheduled test when required. The reasons for staff not taking the next scheduled exam were similar to those for individuals who missed routine skills certification testing, discussed above.

### **VBA Managers Did Not Take Personnel Actions against All Staff Who Failed Consecutive Tests after Receiving Remedial Training**

The OIG estimated 520 employees and supervisors failed tests on consecutive attempts after receiving remedial training within the review period. VBA's plan to Congress (implementing the 2012 law) noted that in these circumstances, personnel would be downgraded to lower positions. VBA's plan further indicated that implementation would occur after notification and appropriate action was taken with the labor union. Review of a sample (42) of these employees revealed no instances of downgrading and only one employee who was converted to a position with a lower potential for promotion. The OIG therefore estimated that 98 percent of the 520 employees and supervisors received no personnel action for failing consecutive tests.

The executive director of the Compensation Service said an agreement between VA and the American Federation of Government Employees labor union constrained VBA from taking personnel actions against staff who failed tests on consecutive attempts. The agreement memo, which predated the 2012 law, stated that skills certification test results would not negatively affect an employee's performance appraisal.

## **Conclusion**

VBA's plan to Congress noted the purpose of mandated certification requirements was to "develop and maintain high quality employees who do the important work of processing claims for compensation and pension benefits for Veterans and their families." VBA managers' failure to comply with skills certification requirements resulted in uncertified staff processing veterans' and beneficiaries' claims. Given the significant investments involved in training and the field's feedback on its limited utility, VBA plans to retool skills certification testing. However, the OIG found that to comply with its plan to Congress, VBA needs to make additional improvements that are reflected in the OIG's six recommendations.

## What the OIG Recommended

The OIG recommended the under secretary for benefits create written guidelines for tracking, identifying, notifying, and registering individuals required to take skill certification tests and for exempting others. To carry out those guidelines, the OIG recommended that the under secretary establish a tracking mechanism that identifies and gives at least 30 days' notice to eligible test takers, update the plan previously submitted to Congress explaining why not all claims-processing employees and supervisors are subject to testing, and implement plans to train staff whose tests show deficiencies and then verify that these staff received the training. In addition, the OIG recommended the under secretary establish an oversight plan to ensure training set out in approved training plans is provided to individuals who fail skills certification tests. Lastly, the OIG recommended that the under secretary notify Congress of plans to take personnel actions against individuals who fail consecutive skills certification tests after remediation for the same positions.

## Management Comments

Of the six recommendations, the acting under secretary for benefits concurred with recommendations 1, 2, 4, and 5. He concurred in principle with recommendations 3 and 6. VBA's concurrences and responses indicate its officials will create a standard operating procedure for administrative tasks associated with eligible test takers; alert eligible individuals 30 days or more before testing dates; and train individuals based on the results of their assessments, including providing oversight of that training. The concurrences in principle relate to notifications the OIG recommended VA make to Congress, which VA stated would be included in a broader notification of the changes to the testing program. Appendix C contains the full text of VA's management comments.

## OIG Response

Acceptable action plans were provided for all recommendations. The OIG will monitor VBA's progress and follow up on implementation of the recommendations until all proposed actions are completed.



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## Contents

Executive Summary .....	i
Abbreviations .....	vi
Introduction.....	1
Results and Recommendations .....	5
Finding: For Four Years VBA Did Not Fully Adhere to Its Plan to Congress to Implement the Law Requiring Claims Processors’ Skill Assessments and Related Corrective Actions .....	5
Recommendations 1–6.....	17
Appendix A: Scope and Methodology.....	19
Appendix B: Statistical Sampling Methodology .....	22
Appendix C: Management Comments.....	27
OIG Contact and Staff Acknowledgments .....	30
Report Distribution .....	31

## Abbreviations

eOPF	Electronic Official Personnel File
FY	fiscal year
GS	General Schedule
OIG	Office of Inspector General
VBA	Veterans Benefits Administration



## Introduction

The Veterans Benefits Administration (VBA) began developing a Skills Certification Program in 2003 to improve the performance and professionalism of claims-processing personnel. The Skills Certification Program administered optional tests for compensation and pension claims processors to measure their capacity to attain and apply the skills, knowledge, and abilities needed to be successful in their positions.

In 2008, Congress passed the Veterans' Benefits Improvement Act to enhance compensation and pension benefits for veterans. The law required the Secretary of Veterans Affairs to provide tests for appropriate VBA employees and managers responsible for processing VA compensation and pension benefits claims.<sup>6</sup>

A 2012 law provided additional mandates. It required the Secretary of VA to submit a plan to regularly assess claims-processing staff, train and then reassess those whose skills are found to be unsatisfactory, and hold accountable those whose skills and competency remain unsatisfactory.<sup>7</sup> In response, VA submitted a plan to Congress that is outlined below.<sup>8</sup>

The VA Office of Inspector General (OIG) conducted this review to determine how effectively VBA managers fulfilled the plan to Congress, and related criteria, to refine and strengthen the Skills Certification Program in compliance with the 2012 legislative requirements.

### Plan Submitted to Congress in Response to the 2012 Law

VA's plan to Congress gives these assurances:<sup>9</sup>

- All employees and supervisors who process compensation and pension claims will take the appropriate skills certification test.<sup>10</sup>
- Staff will be required to pass the appropriate test and recertify every one to two years, depending on their positions.
- Employees and supervisors who do not pass the test will receive training to remediate the deficiencies in their skills and competencies.

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<sup>6</sup> Veterans' Benefits Improvement Act of 2008, Pub. L. No. 110–389, § 225 (2008).

<sup>7</sup> Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012, Pub. L. No. 112-154, §703 (2012), hereafter called the "2012 law."

<sup>8</sup> The OIG, VBA, and VA's Office of Congressional and Legislative Affairs were unable to determine the exact date on which the plan was submitted.

<sup>9</sup> Report to Congress, "Plan for Regular Assessment of Employees of the Veterans Benefits Administration Who Handle Processing of Claims for Compensation and Pension," [Pursuant to] Pub. L. No. 112-154, § 703, n.d.

<sup>10</sup> The plan lists when individuals in specific positions will be required to take the test.

- After remediation, the affected personnel will retake the appropriate test when next offered.
- If the affected personnel do not pass the test for a second time, they will be demoted.
- Implementation will occur after notification and appropriate action is taken with labor union partners.

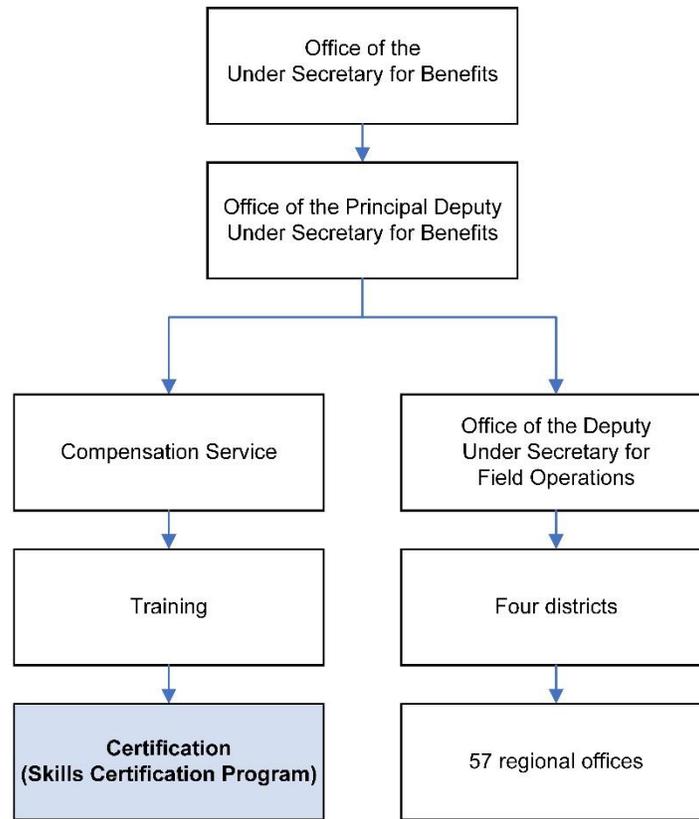
## **August 2019 Pause in Program**

VBA's executive director of the Compensation Service confirmed that VBA wanted to rework the skills certification requirements, based on feedback from field office personnel indicating the Skills Certification Program was not effective in predicting employee success or failure in various positions. Consequently, the executive director also stated that in August 2019, VBA decided not to renew the contract with the group that administered skills certification testing because the program was paused. The contract for administering the testing ended on September 30, 2019, and a senior principal advisor for VBA noted a new assessment program was projected to begin in October 2021. The principal advisor also noted that the frequency of certification was under review by the Compensation Service at the start of fiscal year (FY) 2021.

## **Skills Certification Managers and Staff**

The Compensation Service is the program office that develops, facilitates, and oversees implementation of the skills certification tests for VA employees involved in processing compensation claims and appeals. Compensation Service staff collaborate with their counterparts in the Office of Field Operations and regional offices, as well as with contractors, to monitor the relevance and accuracy of test content. From October 1, 2015, through September 30, 2019, the Compensation Service relied on HII [Huntington Ingalls Industries] Mission Driven Innovative Solutions Inc. (previously Camber Corporation) to administer the skills certification contract. The terms of the contract were to develop, implement, and maintain skills certifications tests for VBA managers and staff.

The Office of the Deputy Under Secretary for Field Operations (Office of Field Operations) oversees VBA's district offices, regional offices (including veterans service centers), and other local offices to ensure they deliver benefits and services effectively and efficiently. In addition, the Office of Field Operations is responsible for providing the district offices and regional offices with direction, guidance, and oversight when new and revised programs, policies, initiatives, and applications are implemented to ensure consistent implementation nationwide. Figure 1 illustrates the structure of these offices and divisions associated with the Skills Certification Program.



**Figure 1.** Offices and divisions associated with the Skills Certification Program.

Source: VA OIG analysis of VBA organizational charts.

## Testing Procedures

From October 1, 2015, through September 30, 2019 (the review period), skills certification testing sessions were usually scheduled twice a year for employees and supervisors. Each session typically offered the tests one or more times over three days. The test was online and open book. The test included multiple choice and situational judgment questions.<sup>11</sup> The test lasted five to six hours depending on the position of the employee taking the test. A proctor administered the tests, and breaks were allowed during testing, but extra time was not allotted for the breaks. Skills certification testing criteria required employees and supervisors who were not successful on their first attempt to take the next scheduled test and continue testing until successful.

Staff and managers received emails notifying them of the testing requirements and the date the tests would be offered. The notifications stated that employees who met eligibility criteria were required to test and could not opt out or skip tests. Individuals required to take the test were also

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<sup>11</sup> Situational judgment questions present a job-related situation and a list of actions that a person in that situation might take.

provided a guide listing steps they could take one month ahead of time, such as participating in training. Table 1 lists eligible employees, specialized requirements, and how often they needed to be recertified.

**Table 1. Positions Designated for Skills Certification Testing**

<b>Position title</b>	<b>General Schedule (GS) grade</b>	<b>Recertification requirement</b>
Veterans service representative	GS 10	Every two years
Senior veterans service representative	GS 11 or 12	Every two years
Authorization or rating quality review specialist	GS 12 or 13	Every year
Rating veterans service representative (with at least 24 months of experience)	GS 12	Every two years
Supervisory veterans service representative (assistant coach or coach) with at least 12 months of experience)	GS 12 or 13	Every two years
Supervisory veterans service representative for the quality review team (assistant coach or coach with at least 12 months of experience)	GS 12 or 13	Every year
Decision review officer	GS 13	Every two years

*Source: VA OIG's analysis of skills certification testing requirements as noted in VBA's plan to Congress and criteria provided by a VBA supervisory staff officer.*

## Results and Recommendations

### **Finding: For Four Years VBA Did Not Fully Adhere to Its Plan to Congress to Implement the Law Requiring Claims Processors' Skill Assessments and Related Corrective Actions**

Contrary to the 2012 law and the plan the VA Secretary submitted to Congress in response, VBA managers did not meet Skills Certification Program requirements to regularly assess, train, reassess, and hold accountable all staff who process claims for compensation and pension benefits. The OIG estimated the following lapses in meeting these requirements occurred during the review period of October 1, 2015, through September 30, 2019 (the most recent full year for which data were available):

- 4,700 of 10,600 individuals obligated to be tested did not take at least one examination as required under VBA's plan to Congress.
- 1,400 of 2,500 supervisors and employees who failed tests took the next scheduled test without receiving requisite remedial training.<sup>12</sup>
- 770 of the 2,500 supervisors and employees who failed tests did not take the next scheduled examination after failing a test during the review period.<sup>13</sup>
- 98 percent of the 520 staff who failed skills certification testing after receiving remedial training faced no personnel action.

During the review period, VBA paused the program after receiving feedback that the testing was not having its intended effect.

Reasons for not meeting testing requirements varied. VBA's process was insufficient for determining when staff were due to take initial and recertification tests and for notifying employees and supervisors of test dates. In addition, VBA did not provide supervisors with criteria to use when granting test exemptions. Finally, the program office did not design tests for all those with claims-processing functions, an omission that a VBA executive director attributed to a lack of performance standards for certain positions.

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<sup>12</sup> This number combines the requirement in the plan to Congress that the employee receive training with the Skills Certification Program requirement that the employee take the next available test.

<sup>13</sup> The plan to Congress requires those who did not pass the test to receive training and take the next available test, whereas the Skills Certification Program required employees who failed simply to take the next available test.

In terms of training, managers did not always provide training plans due to a lack of oversight before FY 2017. Oversight measures by VBA consisting of Program Operations site visits led to improved compliance with training plans in FY 2018 and FY 2019.

The executive director for VBA's Compensation Service attributed the lack of personnel actions, including demotions, to a union agreement. The agreement, which predated the 2012 law, stated that test failures would not negatively affect employees' performance appraisals.

This report discusses the following deficiencies that support the OIG's finding. Specifically, VBA managers failed to consistently perform the following responsibilities:

- Assess all staff who processed claims for compensation and pension benefits, as outlined in VBA's plan.
- Provide training plans or remedial training to all staff who failed the test.
- Ensure all staff who failed tests were reassessed by taking the next scheduled test.
- Take personnel actions against all employees who failed consecutive tests after receiving remedial training.

## What the OIG Did

To determine whether VBA met skills certification requirements outlined in the 2012 law and VBA's plan to Congress, the OIG team reviewed two separate statistically selected data sets for the review period, unless indicated otherwise:

- 100 of an estimated 10,600 VBA claims processors nationwide employed October 1, 2015, through June 30, 2019. The team reviewed this data set to help determine whether VBA assessed all individuals required to take the skills tests for certification.<sup>14</sup>

These claims processors had tests designed for their job positions and were required to take a certification test within this time frame.<sup>15</sup>

- 105 of an estimated 2,500 staff and managers who initially failed a test administered during the review period and were required to receive remedial training and take the next test. The team reviewed these cases to determine if they received remedial training and reassessment.<sup>16</sup>

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<sup>14</sup> The entire review period was, in effect, covered because no tests were conducted after June 30, 2019.

<sup>15</sup> Positions subject to mandatory testing include veterans service representatives, rating veterans service representatives, and decision review officers. Table 1 gives the complete list of employees subject to testing.

<sup>16</sup> There were approximately 18,400 test results for the review period, of which approximately 4,700 were not passing scores.

Proceeding from the population of those who initially failed, the OIG team selected 42 of an estimated 520 staff and managers who failed skills certification tests in consecutive attempts after receiving training plans during the review period to determine if personnel actions were taken.

The team also interviewed staff and managers at the VA central office in Washington, DC, and in four regional offices: Albuquerque, New Mexico; Atlanta, Georgia; Cleveland, Ohio; and Seattle, Washington. Appendixes A and B provide additional details on the review team's methodology.

## **VBA Managers Did Not Regularly Assess All Staff**

The 2012 law requires the VA Secretary to submit a plan to assess claims-processing staff. VBA's plan to Congress stated, "All employees and supervisors who process claims under the laws of Compensation and Pension will take the appropriate skills certification test." The plan required specified employees and supervisors to pass the test every one to two years, depending on their position and level of experience as shown in table 1. As mentioned above, to assess compliance with this plan, the OIG reviewed a random sample of 100 nationwide employees and supervisors of an estimated 10,600 people employed and required to take a certification test within the review period.

Based on the results from the sample, the OIG determined 44 of 100 individuals were not tested as required. Therefore, the OIG estimated that approximately 4,700 of the 10,600 individuals required to take a test did not take at least one examination during the review period as required under VBA's plan to Congress. This plan noted that staff must pass the appropriate test and recertify every one to two years.

There were a range of reasons that individuals did not take tests as required. These have been grouped into the following categories:

- Nonparticipation in administered tests due to
  - waivers provided by managers without criteria noting acceptable reasons for exemption,
  - a flawed process for identifying individuals requiring testing, and
  - inadequate advance notice to identified test takers.
- The canceling of scheduled tests due to
  - negative feedback from field staff in FY 2019, and
  - a technical malfunction in FY 2018.

In addition, the OIG identified supervisory veterans service representatives and quality review specialists who did not have tests designed for their positions as required by VBA's plan to Congress.

### **Individuals Subject to Skills Testing Did Not Always Participate**

Based on the same 100-person statistical sample (in which 44 individuals failed to be tested), the OIG estimated that during the review period approximately 2,200 individuals of the 4,700 required to be assessed did not take the test for reasons other than VBA's cancellation.

#### ***No Criteria for Test Waivers***

Approximately 1,100 claims processors were noted by regional offices to have received waivers from the test for reasons such as maternity leave, annual leave, or details to different duties. However, VBA managers said no criteria specified acceptable reasons for not taking scheduled tests. Test sessions were scheduled twice a year, with each test typically offered one or more times over three days. On that schedule, a missed test session could result in at least a six-month delay in assessing an employee's claims-processing skills.

Email notifications provided to regional offices stated, "Employees who meet the eligibility criteria are required to test and cannot opt-out or skip tests." VBA managers expressed varying opinions on whether waivers could be provided to staff for test exemptions. The OIG determined the law does not address waivers. The deputy under secretary for field operations noted he did not want reasons for test waivers scripted, as he wanted regional office managers to have the flexibility to decide what constituted an acceptable reason for missing a test.

Despite communication noting employees could not opt out of tests, regional offices were notified that any employee who was registered but would not be taking the test required a drop request and justification. A VBA supervisory program analyst stated that the regional offices approve their own drop requests. The lack of criteria dictating acceptable reasons for being exempt from the test could lead to inconsistent reasons for claims processors being exempted from testing.

#### ***Insufficient Process for Identifying Individuals Requiring Testing***

A flawed process for identifying individuals obligated to be tested might have contributed to the lack of staff participation. A VBA chief of training for the Skills Certification Program told the review team the procedure for identifying individuals required to take tests was not documented. The chief of training also said an online tool tracked test results by name of candidate and matched them with human resources data such as potential test candidates' time in positions.

However, the chief of training noted the data from human resources systems sometimes lagged. Moreover, before the introduction of an online registration system in FY 2018, skills certification staff attempted to cross-reference test data with human resources data but unique identifiers, such as employee identification numbers, were not available to track individuals required to take tests.

When regional offices were emailed the lists of individuals required to test, they were informed that any employees not listed but meeting the requirements discussed in table 1 must take the test. However, some managers said they assumed the lists were comprehensive and therefore only notified candidates on the list.

### *Inadequate Advance Notification to Individuals Requiring Testing*

Individuals required to take tests whom the OIG team interviewed from different regional offices said they missed tests due to short notice. Some staff and managers interviewed said candidates were notified of the test less than two weeks ahead of time. One interviewed claims processor said notification came only 48 hours before the test. As a result, staff were often unavailable because of previously approved leave and details to other duties. Also, a VBA test preparation guide stated staff should participate in training one month before certification tests.

A VBA chief of training with the Skills Certification Program said there was no documented policy outlining the notification and registration processes. The OIG team reviewed examples of emailed notifications and interviewed staff to determine the sequence of actions by different offices in the notification process. An analysis of the notification process revealed that VBA's Compensation Service provided the Office of Field Operations a list of individuals required to take tests and dates approximately one month before testing. Notifications then flowed from VBA district offices to regional office managers before individuals required to take the test were notified, as shown in figure 2.



**Figure 2.** Notification process for individuals required to take skills certification tests.

Source: VA OIG analysis of skills certification test notification process.

Depending on the regional office, individuals were notified of the test by either their direct supervisor or the office's training manager.

## **VBA Canceled Testing in the Third Quarter of FY 2019 Based on Field Feedback and Later Paused Additional Testing**

The OIG estimated approximately 1,600 individuals did not take required tests in FY 2019 because scheduled tests were canceled from April through August 2019. The reason, according to VBA's executive director of the Compensation Service, was that feedback from field offices indicated the Skills Certification Program was not effective in predicting employee success or failure in various positions. A senior principal advisor for VBA noted VBA was developing a new assessment program, which was projected to begin in October 2021. The executive director said she did not think VBA had informed Congress of the paused testing but noted the laws do not state how often the certifications need to be done. As a result of the test cancellations, a VBA contracting officer's representative reported that approximately \$1.6 million was removed from the VBA Skills Certification Program budget in FY 2019. VBA's chief financial officer reported these funds were redirected to other priorities such as funding overtime for staff to process claims.

## **FY 2018 Technical Malfunction Led to Test Cancellation**

The OIG estimated approximately 1,400 tests were not conducted due to a system-wide technical issue in the first quarter of FY 2018. A VBA chief of training for the Skills Certification Program informed the review team that tests that would have been conducted in November and December 2017 were canceled because VBA was experiencing significant, ongoing delays in transmitting or processing data and outages affecting the use of online reference sites. The chief of training said reliable, consistent access to online references during test administration was necessary. The chief further noted that the Compensation Service collaborated with the proper VBA and information technology offices and resolved the delays and outages in time to resume the annual testing schedule. However, the chief of training further stated the Compensation Service was not able to reschedule the canceled tests in the first quarter of the fiscal year because the cascading effects would delay scheduled FY 2018 program maintenance and updates. While some staff did take the test when it was rescheduled later in the fiscal year, they went at least an additional six months from the test cancellation without having their claims-processing skills assessed.

Table 2 summarizes the OIG's estimates for individuals who did not take their initial skills certification tests or did not recertify 12 or 24 months from their last assessment as required.

**Table 2. Individuals Who Did Not Take Required Tests during the Review Period, by Reason**

Reason	Estimated number
Nonparticipation of individuals subject to testing	2,200
Cancellation of scheduled FY 2019 tests	1,600
Cancellation due to FY 2018 technical malfunction	1,400

*Source: VA OIG analysis and estimations of statistically sampled VBA employees involved in claims processing who were required to take tests during the review period and had tests designed for them.*

*Note: The estimates in this table total more than 4,700 because some of the categories overlapped, and candidates missed multiple tests for multiple reasons.*

### **Some Claims-Processing Positions Were Omitted from Testing**

The 2012 law (Public Law 112-154, Section 703) gave the VA Secretary the discretion to identify which employees and managers were appropriate for assessment and reassessment. In response, VBA’s plan to Congress stated that, “All employees and supervisors who process claims under the laws of Compensation and Pension will take the appropriate skills certification test.” The plan further listed claims-processing employees and supervisors who would be required to pass tests:

- Veterans service representatives, senior veterans service representatives, rating veterans service representatives, decision review officers, and supervisory veterans service representatives were required to pass the appropriate test and recertify every two years.
- Quality review specialists and quality review supervisors were required to pass the appropriate test and recertify every year.

In addition to the OIG’s review of personnel who had tests designed for their positions and were required to be tested, the OIG identified supervisory veterans service representatives and quality review specialists who did not have tests designed or administered for their positions, but should have had them based on VBA’s plan. Table 3 lists those VBA supervisory veterans service representatives and quality review specialists who were not subject to skills certification testing despite the list provided by VA to Congress and their claims-processing functions.

**Table 3. VBA Supervisors and Quality Review Specialists  
with No Skills Certification Testing Available**

Position title	Claims-processing function(s)
Quality review consultant	Conducts timely, accurate reviews of claims work randomly selected for national review
Veterans service center manager	Grants various issues on appeal and may authorize a medical examination request for a claim; approves correction of administrative errors resulting in payments between \$2,000 and \$24,999; and signs benefit entitlement decisions as necessary
Assistant veterans service center manager	Makes decisions on the types of claims considered most difficult or critical

*Source: VA descriptions of job duties and responsibilities.*

In addition, the review team identified other employees who had claims-processing functions not listed in VBA's plan to Congress and therefore were not subject to testing. Table 4 lists examples of these VBA employees and their claims-processing functions. Although VA has discretion as to who must be tested and the degree of claims-processing functions may vary for each position, the processing done by the employees highlighted below can affect claimants' entitlement to benefits.

**Table 4. VBA Employees with Claims-Processing Functions  
Not Subject to Skills Certification Testing**

Position title	Claims-processing function(s)
Military service coordinator	Develops veterans' claims and is responsible for ensuring the information associated with all aspects of the claims is properly updated in appropriate VBA electronic systems
Claims assistant	Establishes veterans' claims or appeals in VBA's electronic system

*Source: VA descriptions of job duties and responsibilities.*

A Compensation Service deputy executive director for medical disability examinations and budget told the review team she recalled the plan at one point was to add tests for additional positions as funding became available. The deputy executive director said she was not sure why the tests were not eventually created.

VBA managers the OIG team interviewed had varying opinions as to whether certain positions should be considered as claims processors and subjected to testing. However, the plan notes supervisory veterans service representatives are required to take the test, which would include veterans service center managers and assistant veterans service center managers.

VBA's executive director of the Compensation Service reported the lack of prior performance standards for certain positions hindered test development. VBA has since developed performance standards for these positions.

## **VBA Managers Did Not Provide Training Plans or Remedial Training to All Staff Who Failed the Test**

According to VBA's plan to Congress, employees and supervisors who did not pass the test would receive training to address identified deficiencies in their skills and competencies. VBA policy predating the 2012 law (but still in effect) notes that based on the test results and the feedback provided by the Compensation Service or the Pension and Fiduciary Service concerning test performance, the employee and supervisor will identify areas in which improvement is needed and develop a training plan, which might include repeating some classes.<sup>17</sup>

Of approximately 18,400 test results during the review period, over 4,700 were not passing scores. The OIG estimated 2,500 VBA employees and supervisors failed tests on their initial attempts and were required to receive training and retest during the review period. The VBA chief of training over the Skills Certification Program staff stated that VBA determined whether an employee received training based on whether the employee received a training plan. Therefore, to determine whether these employees and supervisors were provided training, the OIG asked VBA if training plans were created for the individuals.<sup>18</sup> Based on VBA's responses, the OIG determined 78 of 105 sampled employees and supervisors were not provided training plans. Therefore, the OIG estimated that 1,900 of the 2,500 VBA employees and supervisors were not provided training. Of the estimated 1,400 employees and supervisors who took the next scheduled and administered test without having a completed training plan (indicating remedial training was not set up), approximately 910 failed.

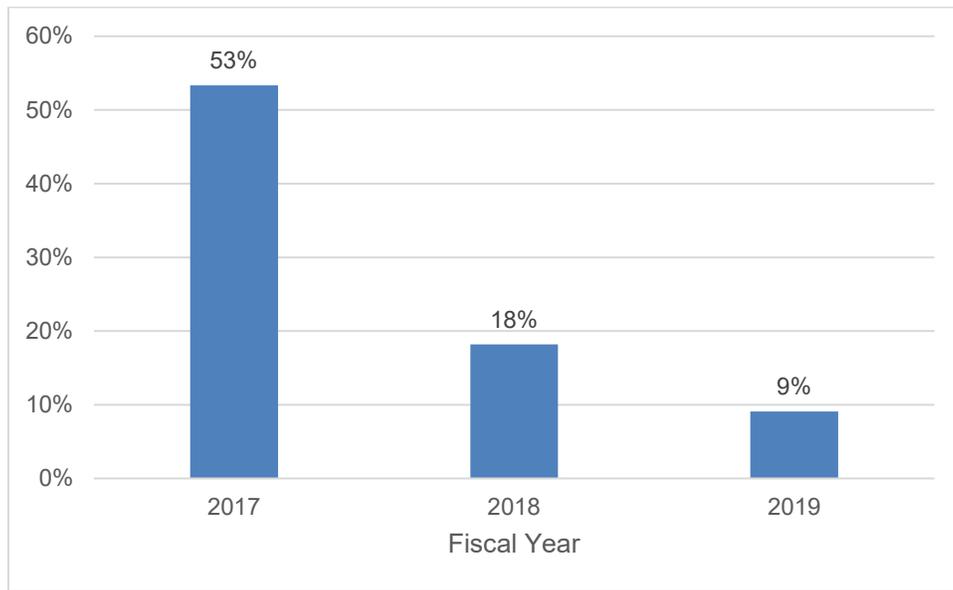
Before FY 2017, VBA did not provide national oversight to ensure training plans were provided to employees and supervisors who had failed certification tests. The deputy under secretary for field operations noted he relied on regional office directors to ensure training plans were created. In FY 2017, VBA Program Operations site visits found that eight of 15 regional offices were not creating training plans as required by a VA policy predating the law.<sup>19</sup> However, in FY 2018 only two of 11 regional offices had instances of noncompliance with training plans, and just one of 11 in FY 2019. Figure 3 illustrates VBA's progress in completing training plans from FY 2017 through FY 2019.

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<sup>17</sup> VBA, Fast Letter 12-19, "Implementation of Article 67, Skills Certification, in the Master Agreement between the Department of Veterans Affairs and the American Federation of Government Employees (AFGE)," July 30, 2012.

<sup>18</sup> The OIG created a SharePoint site for each VBA District to provide a response whether a specific employee had a training plan created following a test failure.

<sup>19</sup> Site visits are conducted by VBA Program Operations staff to ensure that VBA policies, procedures, and support systems pertaining to compensation benefits are followed consistently nationwide.



**Figure 3.** Percent of VBA site visits with a finding that training plans were not completed.

*Source: VA OIG analysis of VBA Compensation Service site visit findings for FY 2017 through FY 2019.*

The review team concluded that VBA’s increased oversight worked by raising awareness, increasing standardization, and calling attention to noncompliance. Managers at regional offices said they were unaware of the requirement to provide training plans following a test failure until the Compensation Service issued a reminder in June 2018. The reminder also provided a template to be used for creating training plans.

To make sure they were in compliance, staff at two regional offices achieved further improvements when they adopted standard operating procedures for creating and issuing training plans. The Atlanta regional office created and documented a standard operating procedure in October 2018, and the OIG team confirmed training plans were issued to staff who warranted them after the procedure was created. The Cleveland regional office had its procedure in place in time for the April 2019 VBA oversight review, which found the office compliant with the training plan requirement. Given the increased compliance with completed training plans following Program Operations site visits, VBA should continue conducting site visits when it resumes testing, to ensure training plans are provided.

### **VBA Managers Did Not Ensure All Staff Who Failed a Test Were Reassessed by Taking the Next Scheduled Test**

VBA’s plan to Congress noted that employees and supervisors who do not pass the skills certification tests will receive remedial training and retake the appropriate test during the next available offering of that test.

The OIG reviewed whether staff who failed a test the first time and remained in the same position took the next scheduled test, regardless of whether they received training (given the large numbers of staff without training plans). The OIG based this analysis on VBA’s skills certification testing criteria. The criteria stated that employees who are not successful on their first attempt are required to take the next scheduled exam. Applying this criteria, the OIG estimated that of approximately 2,500 VBA staff and managers who failed tests on their initial attempts, 770 did not take the next scheduled test when required. Table 5 summarizes the estimates for individuals who failed an exam and did not take the next scheduled skills certification test.

**Table 5. Individuals Who Failed an Exam and Did Not Take the Next Scheduled Test, by Reason**

<b>Reason</b>	<b>Estimated number</b>
Cancelation of scheduled FY 2019 tests	410
Nonparticipation of individuals subject to testing	360
<b>Total</b>	<b>770</b>

*Source: VA OIG analysis and projections from 105 statistically sampled VBA claims processors who failed an initial skills certification test and were required to take the next scheduled test during the review period.*

As previously discussed, tests scheduled from April through August 2019 were canceled and ongoing testing paused, as VBA managers stated they were looking to reassess the effectiveness of the program. The OIG team estimated approximately 360 claims processors who failed tests did not participate in the next offered tests. As with individuals who missed regular skills certification testing, regional office staff and managers attributed some absences to failures in identifying all required test takers and inadequate notification periods. Other absences were also noted to be due to approved waivers from regional office managers, with reasons including staff being on scheduled leave. VBA managers noted no criteria defined acceptable reasons for not taking scheduled tests.

## **VBA Managers Did Not Take Personnel Actions against All Who Failed Consecutive Tests after Receiving Remedial Training**

The 2012 law required the Secretary of VA to submit a plan to take appropriate personnel action if, following training and reassessment, employees’ and supervisors’ skills and competencies remained unsatisfactory. Appropriate personnel action was not defined in the legislation and was left to the Secretary to define. VBA’s plan to Congress stated that if personnel received remedial training but did not pass the test for a second time, they would be downgraded to a lower position. VBA further reported that implementation would occur after notification and appropriate action was taken with the labor union.

The OIG estimated 520 employees and supervisors failed tests on consecutive attempts after receiving remedial training within the review period. The OIG reviewed a random statistical sample of 42 of these employees and supervisors to determine what personnel action was taken when they failed the tests on consecutive attempts.<sup>20</sup> The review team found no employees and supervisors were downgraded, and only one employee was converted to a position with a lower potential for promotion. The OIG therefore estimated 98 percent of the 520 employees and supervisors did not face personnel action for failing consecutive tests after remedial training. VBA's deputy director for the Office of Field Operations concurred with the OIG's finding.

A VBA labor-management relations officer informed the OIG that no discussions between VBA and the labor union had occurred regarding personnel actions for employees and supervisors who failed consecutive tests. Several discussions took place under a previous executive director of the Compensation Service, but no plan was adopted or presented to the labor union. An acting district director and directors or acting director of the four regional offices the review team visited said they were unaware that employees and supervisors who failed tests on consecutive attempts should face consequences.

The executive director of the Compensation Service said an agreement that became effective in February 2012 between VA and its labor union, the American Federation of Government Employees, hindered the skills certification test from being used for performance management and constrained VBA from taking the personnel actions outlined in the plan. The agreement predated the 2012 law requiring the personnel action, and the director felt the agreement ruled out the proposed personnel action. The executive director also said she was not aware who drafted the plan to Congress noting staff would be demoted for failing the tests on consecutive attempts. She noted VBA did consider making the personnel action consist of a conduct disciplinary action, but said that did not come to fruition as it was not considered employee-friendly.<sup>21</sup>

## Conclusion

According to VBA's plan to Congress, skills certification requirements were to "develop and maintain high quality employees who do the important work of processing claims for compensation and pension benefits for Veterans and their families." VBA's failure to maintain regular personnel assessment, provide remediation, and take personnel actions as outlined in the plan to Congress to implement skills certification requirements affected leaders' ability to ensure staff are proficient in the critical job of processing claims for veterans and their families.

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<sup>20</sup> The OIG's initial plan was to review 50 samples; however, based on the high rate at which personnel action was not being taken, the review concluded after 42 samples were reviewed.

<sup>21</sup> According to VA's Office of Human Resource Management, disciplinary actions should be taken when an employee's misconduct has negatively affected the service of the work unit. Disciplinary actions can include admonishment, reprimand, suspension, transfer, reduction in pay, or discharge/removal.

VA agreed to pay a contractor up to \$13.8 million to develop, implement, and maintain skills certification tests from FY 2016 through FY 2019. In addition, VBA estimated costs associated with preparing staff for skills certification and removing employees from claims-processing duties to take tests was over \$6.5 million from FY 2016 through FY 2018.<sup>22</sup> Given these considerable investments, VBA has been working to retool its program to be more effective.

This review sought to determine if VBA managers fulfilled the plan VA submitted to Congress for the Skills Certification Program, as well as related criteria. The OIG team found that VBA needed to make improvements in assessing the skills and competencies of employees who process compensation and pension claims, providing remedial training to those who need it, retesting those who do not pass, and holding employees responsible for successive test failures.

## Recommendations 1–6

The OIG recommended that the under secretary for benefits take the following actions:

1. Create written guidelines for tracking, identifying, notifying, registering, and exempting individuals required to take skills certification tests.
2. Establish a tracking mechanism to ensure all eligible individuals required to take tests are identified and notified of testing dates at least 30 days prior to test administration.
3. Provide an update to the plan submitted to Congress explaining why all employees and supervisors who have claims-processing functions listed in the original plan are not subject to skills certification testing.
4. Implement a plan to ensure staff who failed their most recent skills certification test and remain in the same position are provided training from individual training plans to remediate the deficiencies in their skills and competencies.
5. Establish an oversight plan to ensure training set out in approved training plans is provided to individuals who fail skills certification tests.
6. Notify Congress of plans to take personnel actions against individuals who fail consecutive skills certification tests after remediation for the same positions in compliance with the Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012.

## Management Comments

For the six recommendations, the acting under secretary for benefits concurred with recommendations 1, 2, 4, and 5. He also concurred in principle with recommendations 3 and 6.

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<sup>22</sup> VBA's estimate based on number of test takers, time associated with test preparation and administration, and hourly wages.

VBA's concurrences and responses indicate its officials will create a standard operating procedure for administrative tasks associated with eligible test takers; alert eligible individuals 30 days or more before testing dates; and train individuals based on the results of their assessments, including providing oversight of that training. The concurrences in principle relate to notifications the OIG recommended VA make to Congress, which VA has stated would be included in a broader notification of the changes to the testing program.

## **OIG Response**

The acting under secretary for benefits provided acceptable action plans for each recommendation. The OIG will monitor VBA's progress and follow up on implementation of the recommendations until proposed actions are completed.

## Appendix A: Scope and Methodology

### Scope

The review team conducted its work from November 2019 through December 2020. The review included nationwide VBA claims processors employed and required to take skills certification examinations during the review period. The review team assessed staff and managers nationwide who initially failed a test administered during the review period and were required to receive remedial training and take the next scheduled test. In addition, the team examined staff and managers who failed skills certification tests in consecutive attempts after receiving training plans during the review period.

### Methodology

To accomplish its objective, the review team identified and reviewed applicable laws, VA policies, employment records, and guidelines related to the Skills Certification Program. The review team interviewed managers and staff at VBA's central office. Interviewees included individuals from the Pension and Fiduciary Service, Office of Field Operations, and Compensation Service, including those in the subordinate training staff and Skills Certification Program staff.

Additionally, the review team interviewed field staff and managers from VA regional offices in Albuquerque, New Mexico; Atlanta (Decatur), Georgia; Cleveland, Ohio; and Seattle, Washington. Field staff included veterans service representatives, rating veterans service representatives, quality review specialists, decision review officers, training managers and coordinators, supervisory veterans service representatives, and regional office directors.

The team used two datasets as described in the narrative under What the OIG Did. As to the first dataset, the team focused on 100 VBA employees selected through statistical sampling of approximately 10,600, employed from October 1, 2015, through June 30, 2019, in a testing-designated position, assigned to cost centers that processed compensation and pension benefits, and eligible for a skills certification examination. The designated positions subject to testing and the frequency of assessments are detailed in table 1 on page 4.

Associated cost centers included the following:

- 3010
- 3040
- 3041
- 3042
- 3043

- 3045
- 3047
- 3048

The remaining dataset was used to determine if personnel who failed initial tests received training and reassessment, and whether personnel action was taken against employees with consecutive failures on tests.

The team used skills certification results provided by the Skills Certification Office within VBA's Compensation Service. Additionally, the Office of Field Operations' district offices provided data regarding training plans and test exemptions. Personnel information was obtained from the Office of Personnel Management's Electronic Official Personnel File (eOPF).

## **Fraud Assessment**

The review team assessed the risk that fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements, significant within the context of the objective, could occur during this review. The team exercised due diligence in staying alert to any fraud indicators by

- soliciting the OIG's Office of Investigations for indicators and
- completing the Fraud Indicators and Assessment Checklist.

The OIG did not identify any instances of fraud or potential fraud during this audit.

## **Data Reliability**

The review team used computer-processed data from VA's Personnel and Accounting Integrated Data System. To test reliability, the review team determined whether any data were missing from key fields, included any calculation errors, or were outside the time frame requested. The review team also assessed whether the data contained obvious duplication of records, alphabetic or numeric characters in incorrect fields, or illogical relationships among data elements. Furthermore, the review team compared employees' names, regional office assignments, and the job title-matched test taken to the source documents in the eOPF.

Testing of the data disclosed that they were sufficiently reliable for the review objectives. Comparison of the data with information contained in the source documents in the eOPF did not disclose any problems with data reliability.

This report includes data provided by VBA's Compensation Service and Pension and Fiduciary Service regarding test results. The review team was not able to independently verify the accuracy of the VBA-provided data.

## **Government Standards**

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

## Appendix B: Statistical Sampling Methodology

The objectives of the review were to determine whether VBA's Skills Certification Program consistently

1. assessed the skills and competencies of appropriate employees and managers who are responsible for processing claims for compensation and pension benefits;
2. provided training to those employees whose skills and competencies were assessed as unsatisfactory by the regular assessment;
3. reassessed the skills and competencies of employees who were required to receive training based on an unsatisfactory assessment; and
4. took appropriate personnel action if, following training and reassessment, skills and competencies remained unsatisfactory.

To accomplish the objectives, the review team relied on two data sets. The first assessed a random sample of VBA employees in roles with skills certification tests designed for them from October 1, 2015, through June 30, 2019. For the second, the OIG team reviewed a random sample of skills certification results during the same period. The absence of a training plan, as confirmed by VBA, was used to determine employees and supervisors who were not provided training after a test failure. The team used statistical sampling for the second data set to quantify the extent to which personnel actions were taken when records indicated employees failed consecutive tests after VA managers assessed the employees' skills and provided remedial training.

### Population

The review population for the first objective included 12,324 employees in claims-processing roles with tests developed for their positions from October 1, 2015, through September 30, 2019 (review period). After adjusting for excluded records that the OIG determined to be outside the scope of the review, the remaining population was estimated to be 10,600 VBA claims processors nationwide employed at some point during the period October 1, 2015, through June 30, 2019. These claims processors were required to take a certification test during the review period.

The review population for the second and third objectives included 4,715 test results for employees who failed at least one skills certification examination for the review period. After adjusting for excluded records that the OIG determined to be outside the scope of the review, the remaining population was estimated to be 2,500 employees who failed a skills certification examination during the review period and should have received a training plan.

The review population for the fourth objective included 1,247 test results for employees that failed two or more consecutive tests for the same position during the review period. After adjusting for excluded records that the OIG determined to be outside the scope of the review, the

remaining population was estimated to be 520 employees who failed skills certification tests in consecutive attempts after receiving training plans during the review period.

## Sampling Design

For objective 1, the OIG selected a statistical sample of 100 individuals from the population of VBA claims processors nationwide employed during the period October 1, 2015, through June 30, 2019. These claims processors had tests designed for their job positions and were required to take a certification test within the review period.

For objectives 2 and 3, the OIG selected a statistical sample of 105 individuals from the population of staff and managers who initially failed a test administered during the review period and were required to receive remedial training and take the next test.

For objective 4, the review team selected a statistical sample of 42 individuals from the population of staff and managers who failed skills certification tests in consecutive attempts after receiving training plans during the review period. The OIG's initial plan was to review 50 samples; however, based on the high rate at which personnel action was not being taken, the review concluded after 42 samples were reviewed.

Sampling was performed using the simple random sampling methodology; therefore, all cases had the same probability of being selected.

## Weights

The OIG statistician calculated estimates in this report using weighted sample data. Samples were weighted to represent the population from which they were drawn. The review team uses the weights to compute estimates. For example, the team calculated the error rate point estimates by summing the sampling weights for all sample records that contained the error, then dividing that value by the sum of the weights for all sample records.

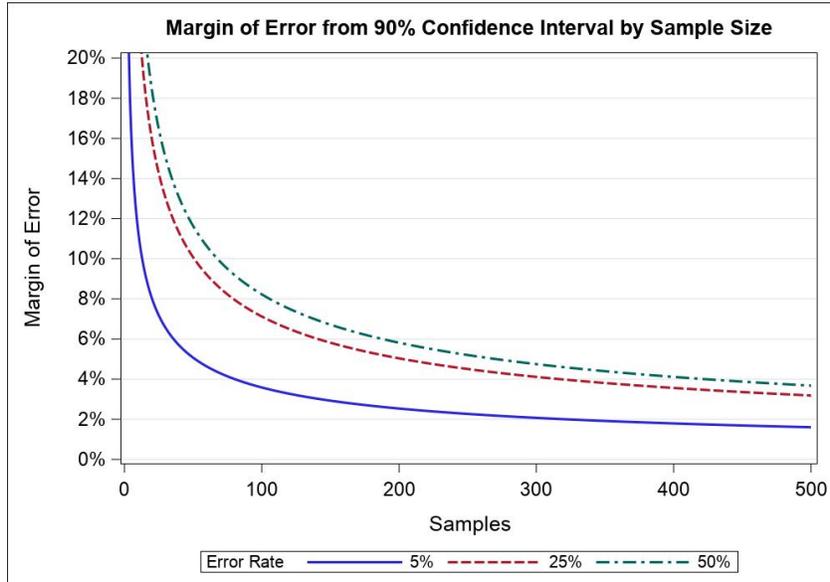
## Projections and Margins of Error

The point estimate (e.g., estimated error) is an estimate of the population parameter obtained by sampling. The margins of error and confidence intervals associated with each point estimate are measures of the precision of the point estimate that account for the sampling methodology used. If the audit team repeated this audit with multiple samples, the confidence intervals would differ for each sample but would include the true population value 90 percent of the time.

The OIG statistician employed statistical analysis software to calculate the weighted population estimates and associated sampling errors. This software uses replication methodology to calculate margins of error and confidence intervals that correctly account for the complexity of the sample design.

The sample size was determined after reviewing the expected precision of the projections based on the sample size, potential error rate, and logistical concerns of the sample review. While precision improves with larger samples, the rate of improvement does not significantly change as more records are added to the sample review.

Figure B.1 shows the effect of progressively larger sample sizes on the margin of error.



**Figure B.1.** Margin of error from 90% confidence interval by sample size.

Source: VA OIG statistician’s analysis.

## Projections

Table B.1 shows the summary of projections and confidence intervals from the OIG’s analysis of nationwide claims processors who were employed during FY 2016 through June 30, 2019. These staff had tests designed for their job positions and were required to take a certification test within this time frame.

**Table B.1. Summary of Projections and Confidence Intervals from OIG’s Analysis of Required Test Takers Employed during the Review Period**

Description	Estimated number	Margin of error based on 90 percent confidence interval	90 percent confidence interval lower limit	90 percent confidence interval upper limit	Count from sample
Total number of individuals required to take tests	10,624	657	9,967	11,281	100

Description	Estimated number	Margin of error based on 90 percent confidence interval	90 percent confidence interval lower limit	90 percent confidence interval upper limit	Count from sample
Individuals that did not take all required tests	4,675	925	3,750	5,599	44
Individuals that did not take administered tests	2,231	734	1,497	2,965	21
Individuals that did not take tests due to FY 2019 cancelation	1,594	639	954	2,233	15
Individuals that did not take tests due to FY 2018 technical issue	1,381	601	780	1,982	13
Individuals that did not take test with waiver granted	1,062	535	528	1,597	10

Source: VA OIG statistician's projection of estimated population based on team's findings.

Table B.2 shows the summary of projections and confidence intervals from OIG's analysis of test results for staff and managers who initially failed a test administered during the review period and were required to take the next test.

**Table B.2. Summary of Projections and Confidence Intervals from OIG's Analysis of Test Results for Employees Who Initially Failed a Test Administered during the Review Period and Were Required to Receive Training and Take the Next Test**

Description	Estimated number	Margin of error based on 90 percent confidence interval	90 percent confidence interval lower limit	90 percent confidence interval upper limit	Count from sample
Total number of staff and supervisors who initially failed a test during the review period and were required to take the next test	2,526	278	2,248	2,804	105
Staff and supervisors who failed test not provided training plans before the next test	1,876	273	1,603	2,150	78
Staff and supervisors who took next administered test without a completed training plan	1,395	255	1,141	1,650	58

Description	Estimated number	Margin of error based on 90 percent confidence interval	90 percent confidence interval lower limit	90 percent confidence interval upper limit	Count from sample
Staff and supervisors who failed next test without a completed training plan	914	221	694	1,135	38
Staff and supervisors who did not take next scheduled test after a failure	770	206	564	976	32
Staff and supervisors who did not take next scheduled test after failure due to FY 2019 cancelation	409	157	252	566	17
Staff and supervisors who did not take next scheduled and administered test after failure	361	148	213	509	15

Source: VA OIG statistician's projection of estimated population based on team's findings.

Table B.3 shows the summary of projections and confidence intervals from OIG's analysis of staff and managers who failed skills certification tests in consecutive attempts after remedial training during the review period.

**Table B.3. Summary of Projections and Confidence Intervals from OIG's Analysis of Employees Who Failed Certification Tests in Consecutive Attempts after Remedial Training during the Review Period**

Results	Projection	Margin of error based on 90 percent confidence interval	Lower 90 percent confidence interval	Upper 90 percent confidence interval	Count from sample
Employees and supervisors who failed certification tests in consecutive attempts after remedial training	524	103	421	626	42
Percentage of employees and supervisors who did not receive personnel action for consecutive test failures after remedial training	98%	3%	94%	100%	41

Source: VA OIG statistician's projection of estimated population based on team's findings.

Note: Projections and confidence intervals do not total precisely due to rounding.

## Appendix C: Management Comments

Department of Veterans Affairs Memorandum

Date: January 26, 2021

From: Under Secretary for Benefits (20)

Subj: OIG Draft Report – VBA Did Not Consistently Comply with Skills Certification Mandates for Compensation and Pension Claims Processors [Project No. 2020-00421-SD-0002] – VIEWS 04274450

To: Assistant Inspector General for Audits and Evaluations (52)

1. Attached is VBA's response to the OIG Draft Report: VBA Did Not Consistently Comply with Skills Certification Mandates for Compensation and Pension Claims Processors.

*The OIG removed point of contact information prior to publication.*

/s/

Thomas J. Murphy

Acting

Attachment

**Attachment**

**Veterans Benefits Administration (VBA)**

**Comments on OIG Draft Report**

VBA Did Not Consistently Comply with Skills Certification Mandates for Compensation and Pension Claims Processors

VBA concurs with OIG's findings and provides the following comments in response to the recommendations in the OIG Draft report:

**Recommendation 1:** Create written guidelines for tracking, identifying, notifying, registering, and exempting individuals required to take skills certification tests.

VBA Response: Concur. VBA will create a standard operating procedure (SOP) for assessment of skills and competencies. The SOP will include written guidelines for tracking, identifying, notifying, registering, and exempting appropriate employees responsible for processing claims for compensation and pension benefits.

Target Completion Date: October 31, 2021.

**Recommendation 2:** Establish a tracking mechanism to ensure all eligible individuals required to take tests are identified and notified of testing dates at least 30 days prior to test administration.

VBA Response: Concur. VBA will ensure appropriate personnel receive advance notice of testing. This process will be outlined in the standard operating procedure.

Target Completion Date: October 31, 2021.

**Recommendation 3:** Provide an update to the plan submitted to Congress explaining why all employees and supervisors who have claims-processing functions listed in the original plan are not subject to skills certification testing.

VBA Response: Concur in principle. VBA will submit a plan to Congress explaining the new skills and competencies assessment process. The plan will include VBA's rationale for modification of the original skill certification testing program.

Target Completion Date: December 30, 2021.

**Recommendation 4:** Implement a plan to ensure staff who failed their most recent skills certification test and remain in the same position are provided training from individual training plans to remediate the deficiencies in their skills and competencies.

VBA Response: Concur. As part of the standard operating procedure, VBA will ensure appropriate training is provided based on the results of the new skills and competencies assessment process.

Target Completion Date: October 31, 2021.

**Recommendation 5:** Establish an oversight plan to ensure training set out in approved training plans is provided to individuals who fail skills certification tests.

VBA Response: Concur. As part of the standard operating procedure, VBA will provide appropriate oversight to ensure training is provided based on the results of the new skills and competencies assessment process.

Target Completion Date: October 31, 2021.

**Recommendation 6:** Notify Congress of plans to take personnel actions against individuals who fail consecutive skills certification tests after remediation for the same positions in compliance with the Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012.

VBA Response: Concur in principle. VBA will provide notification to Congress as discussed above in response to recommendation 3.

Target Completion Date: December 30, 2021.

*For accessibility, the original format of the appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended*

## OIG Contact and Staff Acknowledgments

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<b>Contact</b>	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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