US DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF INSPECTOR GENERAL

Office of Audits and Evaluations

VETERANS BENEFITS ADMINISTRATION

VBA Provided Accurate Training on Processing PACT Act Claims but Did Not Fully Evaluate Its Effectiveness

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Executive Summary

Signed into law in August 2022, the PACT Act dramatically expanded access to VA health care and benefits for millions of veterans exposed to toxic substances.[1] Among other provisions, it increased the number of conditions presumed to be associated with exposure to radiation, herbicides, burn pits, and other sources, as well as the number of locations where such exposure could have occurred. The law phased in these new benefits over several years through 2026.[2] Instead of adopting the phased approach, VA accelerated the timeline and announced it would begin processing all PACT Act claims on January 1, 2023—the earliest date it would have both the authorities and capabilities to do so.[3]

The PACT Act also required VA to train staff responsible for reviewing these new claims and provide training at least annually. The Compensation Service and the Pension and Fiduciary Service within the Veterans Benefits Administration (VBA) are critical to implementing the PACT Act. The Compensation Service is responsible for payments to veterans in recognition of the effects of disabilities incurred during military service. The Pension and Fiduciary Service administers VA's pension, dependency and indemnity compensation, burial benefits, and fiduciary programs. Accordingly, both services created mandatory training courses and released them to employees through VA's online training platform, the Talent Management System. Claims processors were required to complete the mandated training courses before working on PACT Act claims.[4] Staff were also required to achieve at least an 80 percent score on each knowledge check assessment to receive credit for each course. VBA released the first course on September 20, 2022, and gave staff 30 days to complete it. VBA released 12 additional courses in December 2022 with expected completion dates in December 2022 and January 2023.

The core expectation was that the training would produce competent and engaged employees who would efficiently, effectively, and accurately support benefit eligibility determinations for veterans. The Compensation Service, the Pension and Fiduciary Service, and the Training Management and Performance Improvement Division within VBA's Office of Human Capital Service (Training Management) were collectively responsible for developing and executing

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[1] Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act of 2022, Pub. L. No. 117-168.

[2] "VA to begin processing PACT Act benefits claims immediately for terminally ill Veterans" (web page), VA, December 12, 2022, accessed August 14, 2024, https://news.va.gov/press-room/va-to-begin-processing-pact-act-benefits-claims-immediately-for-terminally-ill-veterans/.

[3] "VA will begin processing PACT Act benefits claims for all Veterans and survivors on Jan. 1" (web page), VA, December 29, 2022, accessed August 14, 2024, https://news.va.gov/press-room/va-will-begin-processing-pact-act-benefits-claims-for-all-veterans-and-survivors-on-jan-1/.

[4] PACT Act Implementation Training. (This document is not publicly accessible.)

training evaluation plans.[5] The plans stated that training should result in mission-ready employees for VBA. Training Management was further tasked with evaluating the training outputs, outcomes, and impact.

VBA guidance stated that training evaluations should follow best practices derived from federal requirements, as well as Office of Personnel Management and Government Accountability Office guidelines.[6] These requirements and guidelines call for using the Kirkpatrick four-level model for training evaluation and its updated version, the New World Kirkpatrick Model, both of which are used to assess the immediate and long-term value of training for the organization and pertinent stakeholders. The Kirkpatrick Model is designed to give insights at four levels: (1) reaction—how the participants responded to the training, (2) learning—the degree to which the participants mastered the training content, (3) behavior—the extent to which the learning transferred to the work or real-world setting, and (4) results—how well the training contributed to the achievement of VBA's mission.

Training Management creates summative evaluations (summary reports) to occur after completion of the program or training. These summary reports can be done at each of the four levels of the Kirkpatrick Model; taken together, they indicate how well each individual course, and the training program cumulatively, achieved its expectations. Training Management completes the summary reports by gathering participants' postcourse assessments (such as surveys and test results).

The VA Office of Inspector General (OIG) conducted this review to assess VBA's development and implementation of PACT Act training to prepare staff to process claims beginning January 1, 2023.

What the Review Found

The OIG team reviewed 11 PACT Act online training courses assigned to VBA claims processors in December 2022 to ensure the content accurately summarized PACT Act claims processing guidance.[7] The team also reviewed annual evaluation plans for the Compensation Service and the Pension and Fiduciary Service to assess whether VBA completed the four-level evaluation model for determining training effectiveness.

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[5] The Human Capital Service is a division of VBA responsible for attracting and developing employees.

[6] VBA, *Compensation Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024*, August 2023.

[7] The OIG did not review the first course released in September 2022 because its purpose was to convey interim procedures. The team also did not review a 12th course released in December 2022 because it merely directed the participant to review a standard operating procedure document and contained no training course content. Of the remaining 11 courses, Compensation Service claims processors had to complete nine. Staff in the Pension and Fiduciary Service had to complete all 11 courses. Appendix A lists the course titles the OIG team reviewed.

By cross-referencing the training materials against VBA guidance and the PACT Act legislation, the review team determined the 11 courses contained accurate information regarding the processing of PACT Act claims and that they addressed their stated objectives. In addition, the team found the method by which the training courses were delivered was appropriate and confirmed both that end-of-course surveys were completed by claims processors and that each course included end-of-course test assessments.

The team also reviewed annual evaluation plans for the Compensation Service and the Pension and Fiduciary Service to assess whether VBA completed the four-level evaluation model for determining training effectiveness. While VBA did conduct end-of-course surveys and test assessments, it did not have summary reports created in fiscal year (FY) 2023 that analyzed those results and detailed the effectiveness of the training courses. Although VBA subsequently completed some of the summary reports, it never completed others.

VBA's assistant director of training for the Compensation Service explained to the OIG team that the delay in completing summary reports for PACT Act training courses was due to other priorities, which included training a massive influx of new employees and modifying the PACT Act training materials based on continually updated guidance.

The chief of training for the Pension and Fiduciary Service informed the team he was under the impression the summary reports had been completed. After the OIG brought to his attention that they had not, he said his staff submitted a request to Training Management to complete the reports.

Neither the Compensation Service's training evaluation plan nor the Pension and Fiduciary Service's plans set deadlines for providing the summary reports on the effectiveness of the training. An instructional systems specialist reported to the review team that deadlines were not included in the evaluation plans because there was an expectation they would be done in a timely manner.

Without evaluating the effectiveness of VBA's FY 2023 PACT Act training, VBA had limited assurance it was developing competent and engaged employees who would efficiently, effectively, and accurately implement the changes and requirements in the PACT Act. Reviews of PACT Act claims conducted by the Compensation Service and the Pension and Fiduciary Service showed results below VBA's former standard of 98 percent claims-based accuracy set in the early 2010s.[8]

Inaccurately processing claims increases the risk of issuing improper decisions and then inaccurate payments to veterans and their family members. By failing to complete timely

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[8] Claims-based accuracy is determined by dividing the total number that are error-free by the total number reviewed; issue-based accuracy is determined by separately assessing each decision associated with a claim. In FY 2024, the standard for the Compensation Service was 96 percent issue-based quality. According to VBA, the Pension and Fiduciary Service kept the claims-based standard of 93 percent.

summary reports on the effectiveness of its PACT Act training, VBA could not act on the recommendations in Training Management's summary reports to improve training, which could have improved the accuracy of PACT Act claims processing. Further, as the PACT Act requires annual training on processing PACT Act claims, subsequent training courses have not benefited from the FY 2023 summary report findings.

What the OIG Recommended

The OIG recommended the under secretary for benefits complete the level 1 summary report for the Pension and Fiduciary Service FY 2023 PACT Act training courses and provide feedback from the evaluation reports to training staff. In addition, the OIG recommended VBA establish a plan to conduct all four levels of evaluation for PACT Act training and provide feedback to training staff. Finally, VBA needs to establish deadlines in its training evaluation plans for the creation of summary reports.

VA Management Comments and OIG Response

The under secretary for benefits concurred with all recommendations and provided responsive action plans. The under secretary also provided technical comments found in appendix B. The OIG determined the under secretary for benefits provided acceptable action plans for all recommendations. The OIG will monitor VBA's progress and follow up on VA's implementation progress until adequate documentation has been provided to demonstrate sufficient implementation steps have been taken. In response to the technical comments provided by VBA, the OIG modified report terminology—noting VBA had limited assurance that training effectively prepared staff to process PACT Act claims—and clarified percentages presented in the report.

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Assistant Inspector General
for Audits and Evaluations

Contents

Abbreviations

FY	fiscal year
OIG	Office of Inspector General
PACT Act	Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics Act of 2022
VBA	Veterans Benefits Administration

Introduction

Signed into law on August 10, 2022, the PACT Act dramatically expanded access to VA health care and benefits for millions of veterans exposed to toxic substances.[9] VA has characterized it as "perhaps the largest health care and benefit expansion in VA history."[10]Among other provisions, the act increased the number of conditions presumed to be associated with toxic exposure from radiation, herbicides, burn pits, and other sources, as well as the number of locations where such exposure could have occurred.[11] The law phased in these new benefits over several years through 2026.[12]

To provide veterans with health care and benefits as soon as possible, VA accelerated the PACT Act implementation timeline by several years and made all conditions covered by the PACT Act presumptive as of the date of the law's enactment.[13] VA reported that December 12, 2022, would be the earliest date staff could begin processing claims for terminally ill veterans, and they would finalize decisions only on PACT Act claims that would result in a grant of benefits for those veterans. VA also reported staff would begin processing all PACT Act claims on January 1, 2023—the earliest date they would have both the authority and capabilities necessary to do so.

The PACT Act required VA to train staff responsible for reviewing disability claims related to toxic exposure.[14] The Veterans Benefits Administration's (VBA) Compensation Service and Pension and Fiduciary Service are critical to implementing the PACT Act. The Compensation Service is responsible for payments to veterans in recognition of the effects of disabilities incurred during military service. The Pension and Fiduciary Service administers VA's pension,

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[9] Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act of 2022, Pub. L. No. 117-168; VA, "PACT Act First Year in Review" (fact sheet), August 10, 2023. https://www.accesstocare.va.gov/pdf/VA_PACTActDashboard_Issue13_081023_508.pdf.

[10] "The PACT Act and your VA benefits" (web page), VA, March 5, 2024, accessed July 3, 2024, https://www.va.gov/resources/the-pact-act-and-your-va-benefits/.

[11] VA pays monthly disability compensation to veterans with service-connected disabilities based on the severity of the disability. Service connection is established when evidence shows that a particular injury or disease resulting in disability was caused or aggravated by military service. 38 C.F.R. § 3.303 (2023). In some instances, however, certain diseases are presumed to be service-connected, which means the disease is considered to have been incurred during, or aggravated by, military service within the time frame specified by regulation or statute, even if there is no evidence of this disease during service. VA Manual 21-1, "Presumptive Service Connection (SC)," in sec. V.ii.2.B, *Adjudication Procedures Manual* (updated September 27, 2022), topic 1.a.

[12] "VA to begin processing PACT Act benefits claims immediately for terminally ill Veterans" (web page), VA, December 12, 2022, accessed August 14, 2024, https://news.va.gov/press-room/va-to-begin-processing-pact-act-benefits-claims-immediately-for-terminally-ill-veterans/.

[13] "VA will begin processing PACT Act benefits claims for all Veterans and survivors on Jan. 1" (web page), VA, December 29, 2022, accessed August 14, 2024, https://news.va.gov/press-room/va-will-begin-processing-pact-act-benefits-claims-for-all-veterans-and-survivors-on-jan-1/.

[14] PACT Act § 604(b). The act requires training to be administered at least annually.

dependency and indemnity compensation, burial benefits, and fiduciary programs. To meet the
deadline for processing PACT Act claims, VBA released the first mandatory PACT Act training
course on September 20, 2022. The course discussed interim procedures and required completion
within 30 days. Twelve additional courses were released by the Compensation Service and the
Pension and Fiduciary Service on December 5 and 19, 2022, based on updated and ongoing
guidance. These courses had expected completion dates in December 2022 and January 2023.
Figure 1 shows the timeline for VBA's PACT Act training implementation.

2022

August 10
- President signs PACT Act into law

September 20
- VA releases first course

October 20
- Staff must complete first course

December 5
- The Compensation Service and the Pension and Fiduciary Service
  release eight more courses

December 12
- Staff begin processing claims of terminally ill veterans

December 19
- The Compensation Service releases four more courses

December 30
- Staff must complete Pension and Fiduciary Service courses

2023

January 1
- Staff begin processing all PACT Act claims

January 6
- Staff must complete all remaining courses

Figure 1. VBA's PACT Act training timeline.
Source: OIG's analysis of training availability and completion deadlines.

The OIG conducted this review to assess VBA's development and implementation of PACT Act
training to prepare staff to process claims beginning January 1, 2023.

Training Development and Evaluation Process

VBA's Compensation Service and its Pension and Fiduciary Service are responsible for creating training programs that support a workforce capable of achieving agency mission and performance goals and facilitating continuous improvement of employee and organizational performance. VBA training programs have three required elements: (1) learning objectives that are linked to job competencies, (2) an opportunity to practice what is learned, and (3) a means to assess the effectiveness of the training.[15]

The Compensation Service and the Pension and Fiduciary Service created 12 PACT Act training courses for VBA employees. Two of these courses were released by the Pension and Fiduciary Service and dealt with dependency and indemnity compensation (paid to eligible survivors of deceased veterans) and burial benefits, both of which it is responsible for processing. The Compensation Service released the remaining 10 courses. All 12 courses were assigned in the Talent Management System for relevant staff to take.[16] Staff were required to complete the mandated training courses before working on PACT Act claims.[17] To receive credit for each course, staff had to complete a knowledge check assessment and achieve at least an 80 percent score.[18] Staff also had to respond to an end-of-course survey measuring perceived satisfaction with the training and its value.

The Compensation Service and the Pension and Fiduciary Service, along with the Training Management and Performance Improvement Division (Training Management) within VBA's Office of Human Capital Service, were collectively responsible for developing and executing training evaluation plans.[19] A training evaluation plan describes the program goals, evaluation methods, timelines for capturing and reporting results, roles and responsibilities, an approach for disseminating results, limitations on any analysis, and approved and anticipated uses of evaluation results. In short, the training evaluation plan aligns evaluation activities with training program goals and describes alignment of goals with strategic organizational priorities.

The Compensation Service and the Pension and Fiduciary Service training evaluation plans governed VBA's evaluation of the PACT Act courses during fiscal year (FY) 2023.[20] Training Management was tasked with evaluating the outputs, outcomes, and impact of the trainings using

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[15] Learning objectives are the foundation for instruction and provide specific descriptions of learning outcomes, help build engaging content, and specify how learning outcomes will be measured.

[16] The Talent Management System is VA's online training platform. VA requires that it be used to ensure training compliance and record all training activities.

[17] PACT Act Implementation Training. (This document is not publicly accessible.)

[18] PACT Act Implementation Training. (This document is not publicly accessible.)

[19] The Human Capital Service is a division of VBA responsible for attracting and developing employees.

[20] VBA, *Pension and Fiduciary (P&F) Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024*, July 2023; VBA, *Compensation Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024*, August 2023.

the evaluation plans. The plans stated that training should be planned, designed, developed, implemented, and evaluated in effective and cost-efficient ways and result in mission-ready employees for VBA. The core expectation was that the training would produce competent and engaged employees who would efficiently, effectively, and accurately support benefit eligibility determinations for veterans.

Kirkpatrick Training Model

Evaluation of the training courses was to follow VBA best practices derived from federal requirements as well as Office of Personnel Management and Government Accountability Office guidelines.[21] These requirements and guidelines call for using the Kirkpatrick four-level model for training evaluation and its updated version, the New World Kirkpatrick Model. Both models help demonstrate the immediate and long-term value of training for the organization and pertinent stakeholders. Figure 2 illustrates the four levels of the Kirkpatrick Model.
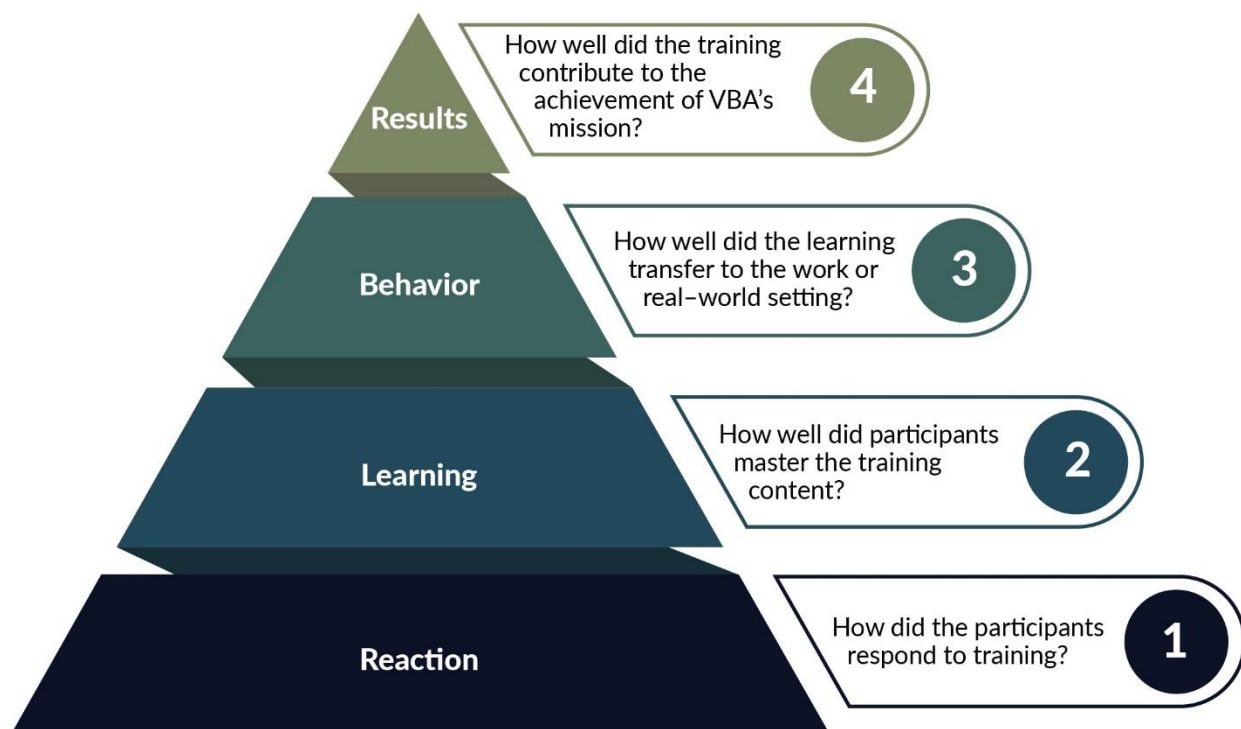

Figure 2. Kirkpatrick's four-level training evaluation model.
Source: Compensation Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024.

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[21] VBA, *Compensation Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024*, August 2023.

Level 1 and level 2 results may be examined immediately after all assigned participants complete the course. Using survey and learning test feedback collected from each participant, Training Management creates a summative evaluation (summary report) indicating how well each individual course, and the training program cumulatively, achieved its expectations. These summary reports can be done at each of the four levels of the Kirkpatrick Model.

In contrast, level 3 and 4 evaluations should occur after sufficient time has passed to allow for the collection of meaningful data. Level 3 is of particular importance because it helps determine whether the participants' learning transferred to on-the-job behavior. Data for level 3 collected at six, nine, and 12 months after training are to be considered for Training Management's summary report. The data are typically obtained through formal assessments, such as job performance observations or graduate surveys or interviews. Level 4 is also important because it determines whether a course was a good training investment for the organization. The evaluation results for level 4 can be obtained through surveys done three, six, nine, and 12 months following course completion.

Results and Recommendations

Finding: VBA Produced Accurate Training on Processing PACT Act Claims but Did Not Fully Evaluate Its Effectiveness

The OIG team found the content of the PACT Act online training courses assigned to VBA claims processors in December 2022 included accurate information on processing claims. In addition, the team found the method by which the training courses were delivered was appropriate, and the team confirmed both that end-of-course surveys were completed by claims processors and that each course included end-of-course test assessments.

However, VBA did not fully evaluate the effectiveness of PACT Act training courses in FY 2023. Turning first to Compensation Service training, Training Management did not create summary reports for levels 1 and 2 for the Compensation Service's training courses until the OIG requested them—more than a year after the courses were completed by the participants. Training Management also did not create the Compensation Service's level 3 and 4 summary reports. According to VBA, the delays in level 1 and 2 summary reports and incompletion of level 3 and 4 evaluations were due to other priorities. VBA's assistant director of training said staff instead focused on providing training for a massive influx of new employees and modifying the PACT Act training materials based on frequently updated guidance.

Turning to the Pension and Fiduciary Service, Training Management did not create level 1, 3, and 4 summary reports. While Training Management did create the level 2 summary report, it did not provide the report to the service, citing the absence of a request by the service.[22] During the team's review, the chief of training for the Pension and Fiduciary Service informed the OIG he was under the impression the summary reports had been created, but his assumption was mistaken. Without reviewing the effectiveness of the PACT Act training using the summary reports, VBA had limited assurance it was developing well-trained employees who would accurately implement the PACT Act requirements. If employees inaccurately process claims because of ineffective training, they risk issuing improper decisions for veterans and their family members, potentially leading to inaccurate benefit payments.

The finding is based on the following determinations about VBA's PACT Act training:

- Despite providing accurate content via an appropriate method, VBA did not fully evaluate the effectiveness of this training.

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[22] Both the Compensation Service and the Pension and Fiduciary Service National Training Curricula say Training Management's responsibilities include providing support for execution of evaluation activities, but neither provides specific guidance on distribution of the information. A Human Capital instructional systems specialist informed the OIG that reports are provided on request.

- Compensation Service did not ask Training Management to create summary reports in FY 2023.

- Pension and Fiduciary Service incorrectly thought summary reports had been created by Training Management.

- Training evaluation plans did not include deadlines for creating summary reports.

- VBA had limited assurance the training effectively prepared staff to process PACT Act claims accurately.

What the OIG Did

The review team identified 12 PACT Act online training courses assigned to VBA claims processors in December 2022.[23] The team reviewed 11 of these courses to ensure the content accurately summarized PACT Act claims processing guidance. The OIG did not evaluate the 12th course because it merely directed the participant to review a standard operating procedure document and contained no training course content. The team also examined annual evaluation plans for the Compensation Service and the Pension and the Fiduciary Service to assess whether VBA completed the four-level evaluation model for determining training effectiveness.

The review team interviewed managers and staff in VBA's Compensation Service, Pension and Fiduciary Service, and Human Capital Service. Appendix A provides additional details on the scope and methodology.

Despite Providing Accurate Content via an Appropriate Method, VBA Did Not Fully Evaluate the Effectiveness of Its PACT Act Training

Of the 11 courses, nine were to be completed by Compensation Service claims processors, and all 11 courses were to be completed by the Pension and Fiduciary Service claims processors.[24] The team assessed whether the training included accurate information and was delivered using a recommended method and whether summary reports of the training were created.

Training Materials Accurately Summarized PACT Act Criteria

The review team determined the 11 training courses addressed the stated objectives and contained accurate information regarding the processing of PACT Act claims. The team cross-referenced the content of the training materials with VBA guidance documents and the PACT Act to confirm the information provided was correct. The review team confirmed

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[23] For a list of PACT Act training courses and assignment dates, see appendix A. The OIG did not review the first course released in September 2022 because its purpose was to convey interim procedures.

[24] The Pension and Fiduciary Service released two additional courses, on dependency and indemnity compensation (paid to eligible survivors of deceased veterans) and burial benefits, both of which it is responsible for processing.

end-of-course surveys were completed by claims processors, and each course also included
end-of-course test assessments.

Most Training Courses Were Delivered in Accordance with VBA's Media Selection Tool

According to VA, a critical aspect of developing a training system is to select the appropriate
medium to meet training requirements. In response to a Government Accountability Office
recommendation that VBA establish documented criteria to determine when a given training
delivery mechanism is appropriate, Training Management developed the Media Selection Tool.[25]
Training staff determine the best media or system to use to train employees by answering a
series of questions for each learning objective. The media options for presenting training
content include

- instructor-led training in a classroom presentation;

- instructor-led, web-based training;

- computer-assisted training—the instructional use of a computer to present training
  methods including simulations, games, and tutorials; and

- interactive multimedia instruction that introduces the learner to ideas in a linear
  format such as a PowerPoint presentation with varying levels of participation.

The review team determined the Compensation Service's training courses were delivered based
on the Media Selection Tool's recommendation. For example, the Media Selection Tool
determined that the best training method for a course titled "PACT Act Implementation:
Radiation Exposure Claims" should incorporate multimedia instruction (such as learning
software) that entails limited participation from the learner.

Pension and Fiduciary Service did not use the Media Selection Tool for its two additional
training courses. A program analyst with Pension and Fiduciary Service said that given the
resources and timeline for the training, it was more efficient for managers and staff to choose the
training method based on experience and knowledge of the material. The team confirmed the
delivery method of the training used multimedia instruction with some participation from those
taking the training.

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[25] Government Accountability Office, *Veterans Benefits Administration Could Enhance Management of Claims
Processor Training*, GAO-21-348, June 7, 2021.

VBA Did Not Evaluate the Effectiveness of the Training Courses in FY 2023

The review team assessed whether VBA evaluated the effectiveness of its PACT Act training courses through the use of summary reports for each of the four levels of training evaluations—reaction, learning, behavior, and results.

On February 6, 2024, the OIG asked whether the evaluations of the FY 2023 PACT Act training courses had been completed. The VBA chief of compensation training staff informed the team two days later that the effectiveness of the PACT Act training courses had not been evaluated. The same day, the chief asked Training Management to create a summary report for PACT Act training course materials. After the OIG team's inquiry, Training Management completed the level 1 (react) and level 2 (learn) summary reports by analyzing the end-of-course surveys and test results. This occurred more than a year after participants completed the training courses.

Level 1—React

The level 1 summary report for Compensation Service's FY 2023 online PACT Act training courses found that participants' reactions to the courses were generally positive, although many of the courses received ratings just below the target of 80 percent of respondents expressing that they valued and were satisfied and engaged with the courses. Participant responses summarized in the level 1 report also highlighted opportunities to improve individual courses, and Training Management made recommendations such as:

- Make the PACT Act courses more interactive and engaging.

- Have the training leaders and course developers review claims processors' comments on the end-of-course surveys to better understand how to increase training value.

- Suggest training leaders review, and potentially update, their approach for evaluating PACT Act courses.

The Pension and Fiduciary Service collected the end-of-course surveys for FY 2023 PACT Act training courses and provided some analysis of two of the courses in February 2024. However, Training Management did not create a level 1 (react) summary report for the Pension and Fiduciary Service, similar to the analysis done for the Compensation Service in 2024.

Level 2—Learning

Training Management created a level 2 summary report for both the Compensation Service's and the Pension and Fiduciary Service's PACT Act training courses. This report revealed that participants in only five of the 11 courses (45 percent) achieved at least a 90 percent pass rate on

the end-of-course assessment within two attempts.[26] The report recommended that course developers review both the content and the end-of-course assessments for the courses with the lowest pass rates. During the OIG review, the Compensation Service requested and received the report. The Pension and Fiduciary Service did not request the report and therefore did not receive it.

Level 3 (Behavior) and Level 4 (Results)

The OIG review team confirmed with the training chiefs for both the Compensation Service and the Pension and Fiduciary Service that level 3 and 4 summary reports had not been created or evaluated. The *Compensation Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024* indicated level 3 and level 4 evaluations would not be conducted for the national training curriculum.

The OIG's first recommendation is for VBA to complete the level 1 summary reports for the Pension and Fiduciary Service FY 2023 PACT Act training courses and provide feedback from the reports to training staff.

Compensation Service Did Not Ask Training Management to Create Summary Reports in FY 2023

VBA's assistant director of training for the Compensation Service told the OIG review team the delay in completing the level 1 and 2 summary reports for PACT Act training courses was due to other priorities. Specifically, the assistant director noted staff were providing training for a massive influx of new employees and modifying the PACT Act training materials based on continually updated guidance.

The *Compensation Service National Training Curriculum (NTC) Annual Evaluation Plan for FY 2023–FY 2024* specified that level 3 and level 4 evaluations would not be conducted in FYs 2023 or 2024. The assistant director of training for Compensation Service explained that national evaluations of those levels do not typically occur because most of the training was meant to be flexible, as the training topics can vary by VA regional office. Such variation made it difficult to plan for doing level 3 and level 4 evaluations nationally. In addition, as previously noted, the assistant director said the level 3 and level 4 evaluations did not occur due to other priorities. In July 2024, when asked about plans to conduct the reviews in the future, a Human Capital instructional systems specialist informed the team that it was no longer beneficial to do so because the data used to create a summary report would be skewed after such a lengthy delay.

The Compensation Service conducted a special-focused review to analyze the accuracy of PACT Act claims completed in FY 2023. Its report said action was taken to provide error trend

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[26] Staff were required to achieve at least an 80 percent score on each knowledge check assessment to receive credit for each course.

information to training staff, but the report did not evaluate how the PACT Act training affected the accuracy of claims processing. The Pension and Fiduciary Service also conducted a special-focused review, which included a review of the initial PACT Act training's effectiveness. That report recommended that the Pension and Fiduciary Service training staff update materials for one of the PACT Act courses but did not mention the other PACT Act training courses.

Pension and Fiduciary Service Incorrectly Thought Summary Reports for PACT Act Training Had Been Created by Training Management

The chief of training for the Pension and Fiduciary Service informed the OIG team he was under the impression the summary reports for levels 1 through 4 had already been created by Training Management, which he noted had provided the service other reports. After the OIG brought it to his attention that the summary reports had not been created, he said a request was submitted to Training Management to complete those reports. The chief of training also noted that while the summary reports had not been created, other analysis such as meetings related to training feedback had been done.

The OIG's second recommendation is for VBA to establish a plan to conduct all four levels of evaluation and to provide feedback to training staff.

Training Evaluation Plans Did Not Include Deadlines for Creating Summary Reports

The training evaluation plans for both the Compensation Service and the Pension and Fiduciary Service indicated Training Management would collect level 1 and level 2 data upon all participants' completion of the training courses. However, the plans did not specify when the data would be summarized beyond saying it would occur after the programs or training were complete.

A Human Capital instructional systems specialist reported to the review team that deadlines for the summary reports were not included in the evaluation plans because there was an expectation they would be done in a timely manner. She further said future evaluation plans would include deadlines. Similarly, the chief of training for the Pension and Fiduciary Service noted the plans did not include the evaluation due dates and said it was his expectation that the summary reports would be completed shortly after the fiscal year-end.

The OIG's third recommendation is for VBA to establish deadlines in the training evaluation plans for the creation of summary reports.

VBA Had Limited Assurance Training Effectively Prepared Staff to Process PACT Act Claims Accurately

Without evaluating the effectiveness of its FY 2023 PACT Act training, VBA had limited assurance it was developing well-trained, competent, and engaged employees who would efficiently, effectively, and accurately implement the PACT Act changes and requirements. A special-focused review conducted by the Compensation Service analyzing PACT Act-related claims completed from May through July 2023 found an overall claims-based PACT Act accuracy rate of 82 percent.[27] A special-focused review was also conducted on claims completed by the Pension Management Centers from January 1 through March 7, 2023, which found an overall PACT Act accuracy rate of 76 percent.[28] Both accuracy rates were below VBA's former standard of 98 percent claims-based accuracy set in the early 2010s and below the average general claims-related accuracy of 86.9 percent for the same period. For further comparison, the 12-month general claims-based accuracy rate for 2022 (the year before VBA began processing all PACT Act claims) was 87.8 percent for the Compensation Service and 97.4 percent for the Pension and Fiduciary Service.

Inaccurately processing claims increases the risk of issuing improper decisions and payments to veterans and their family members. By failing to evaluate the effectiveness of its PACT Act training, VBA missed an opportunity to improve its training and potentially the accuracy of PACT Act claims processing. Further, because the legislation requires employees to receive training on the PACT Act at least annually, the subsequent courses did not benefit from the FY 2023 summary report findings. The refresher PACT Act training courses for FY 2024 were released in March 2024, *before* some of the summary reports for the FY 2023 PACT Act training courses were created.

Conclusion

For VA, the PACT Act was perhaps the largest benefits expansion in history. It requires VA to provide annual training for staff who review claims for disability benefits related to toxic exposure. The OIG determined VBA provided accurate training content to claims processors and

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[27] VBA's claims-level accuracy rate (distinct from the accuracy rate for issues within claims) is determined by dividing the total number that are error-free by the total number reviewed. As of FY 2024, the standard was 96 percent issue-based quality, in which each individual decision associated with a claim is assessed separately. According to VBA, the standard for Pension and Fiduciary rating claims-based accuracy (in which each rating claim is assessed in its entirety, rather than each issue) was 93 percent.

[28] Pension Management Centers are centralized locations where VA's pension, dependency and indemnity compensation, burial benefits, and other death-related benefits are processed. VA Manual 21-1, "Organization of the Pension Management Centers (PMCs)," in sec. I.ii.1.B, *Adjudication Procedures Manual* (updated November 20, 2023), topic 1.a. The accuracy rate for benefit entitlement quality issues was 88 percent. According to VBA, benefit entitlement errors generally occur when completed claim actions do not align with prescribed regulations or other directives. They affect outcome or have the potential to affect outcome.

delivered training using appropriate methods. However, VBA did not evaluate the effectiveness of the training in FY 2023 and had not completed all levels of evaluation at the time of the OIG team's review. Until VBA evaluates the training's effectiveness and makes improvements, veterans and their survivors are at risk of having their PACT Act claims incorrectly processed.

Recommendations 1–3

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

1. Complete level 1 summary reports for the Pension and Fiduciary Service fiscal year 2023 PACT Act training courses and provide feedback from the reports to training staff.

2. Establish a plan to conduct all four levels of evaluation for PACT Act training and provide feedback to training staff.

3. Establish deadlines in training evaluation plans for the creation of summary reports.

VA Management Comments

The under secretary for benefits concurred with all recommendations and provided the following action plans. For recommendation 1, the under secretary reported VBA will complete summary evaluation reporting for the PACT Act online courses taken by Pension and Fiduciary claims processors in December 2022 that analyze the level 1 data for all PACT Act online courses. Pension and Fiduciary Service will provide feedback on FY 2023 summary reports to training staff to ensure PACT Act training outcomes are communicated to field training staff.

For recommendation 2, the under secretary committed to both the Compensation Service and the Pension and Fiduciary Service establishing a plan to conduct all four levels of evaluation for FY 2025 PACT Act training. The two plans will describe the methodology to complete the levels of evaluation and how feedback from findings will be provided to training staff.

For recommendation 3, the under secretary reported the Training Management and Performance Improvement Division within VBA's Office of Human Capital Service has established timelines for the creation of summary reports but will ensure they are clearly articulated in all evaluation plans starting in FY 2025.

Finally, the under secretary also provided technical comments asking the OIG to adjust the report to clarify VBA terminology—to note the finding was VBA had *limited* assurance that training effectively prepared staff to process PACT Act claims accurately (rather than *no* assurance)— and to clarify percentages regarding pass rates for level 2 assessments and the Pension and Fiduciary Service special-focus review finding. See appendix B for the full text of the under secretary's comments.

OIG Response

The under secretary for benefits provided acceptable action plans for all recommendations. The OIG will monitor VBA's progress and follow up until adequate documentation has been provided to demonstrate sufficient implementation steps have been taken.

In response to the technical comments provided by VBA, the OIG made the following modifications to the report:

- The term "dependent indemnity compensation" was changed to "dependency and indemnity compensation."

- Footnotes were added to clarify that, according to VBA, the standard for Pension and Fiduciary rating claims-based accuracy was 93 percent in which each rating claim is assessed in its entirety, rather than each separate issue.

- Sentences saying VBA had "no assurance" it was developing well-trained employees that would accurately implement the PACT Act requirements were changed to "limited assurance" as VBA eventually did do some, but not all, of the training assessments in FY 2023.

- A footnote was added to reiterate that an 80 percent score on each knowledge check assessment was needed to receive credit for each course for level 2 assessments.

- A footnote was added to provide context that while the overall accuracy rate for Pension and Fiduciary PACT Act claims was 76 percent, the benefit entitlement rate for quality issues was 88 percent.

Appendix A: Scope and Methodology

Scope

The VA Office of Inspector General (OIG) conducted its review work from November 2023 and concluded the review in September 2024. The review team assessed the mandatory online PACT Act claims processor training courses released in December 2022.[29] Table A.1 provides the full list of the course titles the OIG team reviewed and the dates they were assigned.

Table A.1. Mandatory Online PACT Act Training Courses Released in 2022

Training course	Assignment date
PACT Act Implementation: Herbicide Exposure Claims	December 5, 2022
PACT Act Implementation: Radiation Exposure Claims	December 5, 2022
PACT Act Implementation Overview	December 5, 2022
PACT Act Undiagnosed Illnesses and Medically Unexplained Chronic Multisymptom Illnesses (MUCMIs)	December 5, 2022
PACT Act Implementation: Presumptive SC Based on Exposure to Burn Pits and Other Toxins, Including Fine Particulate Matter	December 5, 2022
PACT Act Effect on Burial Claims, Accrued Claims, and Supplemental Claims	December 5, 2022
PACT Act Dependency and Indemnity Compensation—Original and Reevaluation Dependency and Indemnity Claims	December 5, 2022
Introduction to Toxic Exposure Risk Activity (TERA)	December 19, 2022
Toxic Exposure Risk Activity (TERA) Procedures for Non-Presumptive Claims and Examinations	December 19, 2022
PACT Act Implementation: Rating Claims Based on Participation in TERA	December 19, 2022
Toxic Exposure Risk Activity (TERA) Procedures	December 19, 2022

Source: VBA National Training Curriculum for FY 2023.

Methodology

To accomplish the objective, the OIG completed the following actions:

- reviewed applicable laws, policies, and procedures related to the development and implementation of the mandatory online PACT Act training courses released in December 2022

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[29] Sergeant First Class Heath Robinson Honoring our Promise to Address Comprehensive Toxics (PACT) Act of 2022, Pub. L. No. 117-168 (2022).

- assessed 11 mandatory online PACT Act training courses released in
  December 2022[30]

- interviewed and obtained information from VBA's Compensation Service training
  managers and staff, Pension and Fiduciary Service training managers and staff, and
  Human Capital Service staff

Internal Controls

The review team assessed the internal controls significant to the review objective. This included
an assessment of the five internal control components: control environment, risk assessment,
control activities, information and communication, and monitoring.[31] The team also reviewed the
principles of internal controls as associated with the objective. The team identified the following
components and principles as significant to the objective:[32]

- Component: Information and Communication

  - Principle 14: Management should internally communicate the necessary quality
    information to achieve the entity's objectives.

- Component: Monitoring

  - Principle 16: Management should establish and operate monitoring activities to
    monitor the internal control system and evaluate the results.

Additionally, the team identified internal control weaknesses during this review and proposed
recommendations to address the control deficiencies for the components and principles
listed above.

Data Reliability

This report includes data provided by VBA's Compensation Service and the Human Capital
Service regarding course survey and assessment testing results as well as output results using the
Media Selection Tool.

The review team did not independently verify the accuracy of the course surveys and assessment
testing results provided by Human Capital Service because this information was used for
background purposes and was not used to support the findings.

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[30] The OIG team did not review a 12th course because it merely directed the participant to review a standard
operating procedure document and contained no training course content.

[31] Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G,
September 2014.

[32] Since the review was limited to the internal control components and underlying principles identified, it may not
have disclosed all internal control deficiencies that may have existed at the time of this review.

The review team could not independently verify the accuracy of the Media Selection Tool results because the OIG did not have access to the tool and could not determine what inputs were used to obtain the results. As a result, the OIG could not determine whether the data were sufficiently reliable for the purposes of this report.

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: VA Management Comments
from the Under Secretary for Benefits

Department of Veterans Affairs Memorandum

Date: November 12, 2024

From: Under Secretary for Benefits (20)

Subj: Office of Inspector General (OIG) Draft Report - VBA Provided Accurate Training on Processing PACT Act Claims but Did Not Fully Evaluate Its Effectiveness [Project No. 2023-03485-AE-0138] — [VIEWS 12201685]

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

1. Thank you for the opportunity to review and comment on the OIG draft report: VBA Provided Accurate Training on Processing PACT Act Claims but Did Not Fully Evaluate Its Effectiveness. The Veterans Benefits Administration (VBA) provides the attached response to the draft report.

The OIG removed point of contact information prior to publication.

(Original signed by)

Joshua Jacobs

Attachment

Attachment

Veterans Benefits Administration (VBA)

Comments on OIG Draft Report

VBA Provided Accurate Training on Processing PACT Act Claims but

Did Not Fully Evaluate Its Effectiveness

The Veterans Benefits Administration (VBA) concurs with OIG's draft report findings and provides the following general comments:

On August 10, 2022, the PACT Act became law, significantly expanding veterans' eligibility for disabilities that VA presumes are related to exposure to toxic substances. VBA was faced with implementing the PACT Act legislation in a matter of months and started fully processing PACT Act claims on January 1, 2023.

VBA is committed to ensuring the accuracy of its training materials and assessing training consistent with the Government Accountability Office (GAO) report GAO-04-546G, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government.* The report introduces a framework consisting of a set of principles and key questions that federal agencies can use to ensure that their training and development investments are targeted strategically and are not wasted on efforts that are irrelevant, duplicative, or ineffective. The report states that when evaluating specific training and development programs, agencies should select the analytical approach that best measures the effect of a program while also considering what is realistic and reasonable given the broader context of the issue and fiscal constraints. The GAO report also states that not all training and development programs require, or are suitable for, higher levels of evaluation, and that higher levels of evaluation can be challenging to conduct because of the difficulty and the complexity in directly linking training and development programs to improved individual and organizational performance.

VBA provides the following technical comments:

Page i, Executive Summary, paragraph 2:

"The Pension and Fiduciary Service administers VA's pension, dependent indemnity compensation (DIC), burial benefits, and fiduciary programs."

VBA Comment: VBA notes that there are multiple instances in which OIG should consider replacing the term "dependent indemnity compensation" with "dependency and indemnity compensation." Dependency indemnity compensation (DIC) is the correct program name.

Page iii, Footnote, citation 8, last sentence:

"[8] VBA's national accuracy rate for claims (distinct from the accuracy rate for issues within claims) is determined by dividing the total number that are error-free by the total number reviewed. As of FY 24, the standard is 96 percent issue-based quality, in which each individual decision associated with the claim is assessed separately."

VBA comment: The footnote does not accurately capture Pension and Fiduciary (P&F) Service fiscal year (FY) 2024 accuracy standards. Compensation Service (CS) measures quality based on individual issues while P&F measures rating quality based on the entire rating claim. Because of this variance, the accuracy standards are different. CS FY 2024 issue-based quality standard was 96%. The FY 2024 standard for P&F rating claims-based accuracy was 93%. Therefore, VBA suggests this footnote is revised as follows:

"National accuracy rate for claims (distinct from the accuracy rate for issues within claims) is determined by dividing the total number that are error-free by the total number reviewed. As of FY 24, the standard Compensation accuracy standard is 96% issue-based quality, in which each individual decision associated with the claim is assessed separately. The standard for Pension and Fiduciary rating claim-based accuracy was 93% in which each rating claim is assessed in its entirety, rather than each separate issue."

Page 1, Introduction, paragraph 3:

"The Pension and Fiduciary Service administers VA's pension, dependent indemnity compensation (DIC..."

VBA Comment: VBA notes that there are multiple instances in which OIG should consider replacing the term "dependent indemnity compensation" with "dependency and indemnity compensation." Dependency indemnity compensation (DIC) is the correct program name.

Page 6, fourth paragraph, fourth sentence

"Without reviewing the effectiveness of the PACT Act training using the summary reports, VBA had no assurance it was developing well-trained employees that would accurately implement the PACT Act requirements."

VBA Comment: VBA requests OIG state that VBA had "limited" assurance the training effectively prepared staff to process PACT Act claims accurately. VBA would like to convey that the organization consistently evaluated the effectiveness of PACT Act training courses using a variety of methods. VBA conducted listening sessions with field employees; reviewed error trend analysis provided by Quality Assurance staff; and reviewed questions and answers posed by field employees in the PACT Act Inquiry tool.

Additionally, after implementing PACT Act training in FY 2023, VBA's P&F Service conducted live meetings that included feedback from field personnel to gather real-time insights and experiences related to the training. Additionally, P&F conducted a special focused review to assess the impact and effectiveness of the courses and the quality of work to identify areas to improve PACT Act training. P&F completed course updates in response to feedback and quality analysis to enhance the effectiveness of training and address any issues identified.

As such, VBA recommends the following language:

"Without reviewing the effectiveness of the PACT Act training using the summary reports, VBA had limited assurance it was developing well-trained employees that would accurately implement the PACT Act requirements."

Page 7, top of page, fourth bullet

"VBA had no assurance the training effectively prepared staff to process PACT Act claims accurately."

VBA Comment: VBA requests OIG state that VBA had "limited" assurance the training effectively prepared staff to process PACT Act claims accurately. VBA would like to convey that the organization consistently evaluated the effectiveness of PACT Act training courses using a variety of methods. VBA conducted listening sessions with field employees; reviewed error trend analysis provided by Quality Assurance staff; and reviewed questions and answers posed by field employees in the PACT Act Inquiry tool. VBA recommends the following language:

"VBA had limited assurance the training effectively prepared staff to process PACT Act claims accurately."

Page 9, last paragraph, second sentence

"This report revealed that participants in only five of the 11 courses (45 percent) achieved at least a
90 percent pass rate on the end-of-course assessment within two attempts."

<u>VBA Comment</u>: VBA requests OIG state that VBA correct that the report revealed that participants in only
five of the 11 courses (45%) achieved at least an 80% pass rate on the end-of-course assessment within
two attempts. VBA requires staff to achieve at least an 80% score on each knowledge check assessment
to receive credit for each course. VBA recommends the following language:

"This report revealed that participants in only five of the 11 courses (45 percent) achieved at least an
80 percent pass rate on the end-of-course assessment within two attempts."

Page 11, last paragraph, first sentence

"Without evaluating the effectiveness of its FY 2023 PACT Act training, VBA had no assurance it was
developing well-trained, competent, and engaged employees who would efficiently, effectively, and
accurately implement the PACT Act changes and requirements."

<u>VBA Comment</u>: VBA requests OIG state that VBA had "limited" assurance the training effectively
prepared staff to process PACT Act claims accurately. VBA would like to convey that the organization
consistently evaluated the effectiveness of PACT Act training courses using a variety of methods. VBA
conducted listening sessions with field employees; reviewed error trend analysis provided by Quality
Assurance staff; and reviewed questions and answers posed by field employees in the PACT Act Inquiry
tool. VBA recommends the following language:

"Without evaluating the effectiveness of its FY 2023 PACT Act training, VBA had limited assurance it was
developing well-trained, competent, and engaged employees who would efficiently, effectively, and
accurately implement the PACT Act changes and requirements."

Page 12, top of page, first paragraph, second sentence:

"A special focused review was also conducted on claims completed by the Pension Management Centers
from January 1, 2023, through March 7, 2023, which found an overall PACT Act accuracy of
76 percent[28]."

<u>VBA Comment</u>: This sentence does not make it clear that the accuracy rate for benefit entitlement (BE)
quality issues was 88%. Generally, BE errors occur when completed claim actions do not align with
prescribed regulations or other directives and affects outcome or has the potential to affect outcome. VBA
requests OIG clarify the sentence to indicate that the special focused review conducted on claims
completed by the Pension Management Centers from January 1, 2023, through March 7, 2023, found
benefit entitlement PACT Act accuracy of 88%. VBA recommends the following language:

"Generally, BE errors occur when completed claim actions do not align with prescribed regulations or
other directives and affects outcome or has the potential to affect outcome. A special focused review
conducted on claims completed by the Pension Management Centers from January 1, 2023, through
March 7, 2023, found benefit entitlement PACT Act accuracy of 88%."

Page 12, top of page, first paragraph, third sentence:

"[27] Both accuracy rates were below VBA's former standard of 98 percent claims-based accuracy set in the
early 2010s, and below the average general claims-related accuracy of 86.9 percent for the same period."

<u>VBA Comment</u>: VBA suggests that a footnote is needed to note the difference in measuring CS and P&F
rating accuracy. CS measures quality based on individual issues while P&F measures rating quality

based on the entire rating claim. Because of this variance, the accuracy standards are different. CS issue-based quality standard for FY 2024 was 96%. The standard for P&F rating claims-based accuracy for FY 2024 was 93%. Therefore, VBA suggests a footnote is added as follows:

"National accuracy rate for claims (distinct from the accuracy rate for issues within claims) is determined by dividing the total number that are error-free by the total number reviewed. As of FY 24, the standard Compensation accuracy standard is 96 percent issue-based quality, in which each individual decision associated with the claim is assessed separately. The standard for Pension and Fiduciary rating claim-based accuracy was 93 percent in which each rating claim is assessed in its entirety, rather than each separate issue."

Page 12, Footnote 2, citation 28:

"28 A Pension Management Centers are centralized locations where VA's pension, dependent indemnity compensation, burial benefits, and other death related benefits are processed. VA Manual 21-1, "Organization of the Pension Management Centers (PMCs)," in sec. I.ii.1.B, Adjudication Procedures Manual (updated November 20, 2023), topic 1.a"

VBA Comment: VBA notes that there are multiple instances in which OIG should consider replacing the term "dependent indemnity compensation" with "dependency and indemnity compensation." Dependency indemnity compensation (DIC) is the correct program name.

VBA provides the following comments in response to the recommendations in the OIG draft report:

Recommendation 1: Complete level 1 summary reports for the Pension and Fiduciary Service fiscal year 2023 PACT Act training courses and provide feedback from the reports to training staff.

VBA Response: Concur. VBA will complete summary evaluation reporting for the PACT Act online courses taken by P&F claims processors in December 2022 that analyze the Level 1 data for all PACT Act online courses. P&F will provide feedback on FY 2023 summary reports to training staff to ensure that PACT Act training outcomes are communicated to field training staff.

Target Completion Date: TBD

Recommendation 2: Establish a plan to conduct all four levels of evaluation for PACT Act training and provided feedback to training staff.

VBA Response: Concur. VBA commits to both CS and P&F establishing a plan to conduct all four levels of evaluation for FY 2025 PACT Act training. The two plans will describe the methodology to complete the levels of evaluation and how feedback from findings will be provided to training staffs.

Target Completion Date: March 31, 2025

Recommendation 3: Establish deadlines in training evaluation plans for the creation of summary reports.

VBA Response: Concur. The Training Management and Performance Improvement (TMPI) Division within VBA's Office of Human Capital Service (HCS) currently has established timelines for the creation of summary reports but will ensure they are clearly articulated in all evaluation plans starting in FY 2025, to include information pertaining to end of event, end of survey, and report submission.

Target Completion Date: December 31, 2024

> *For accessibility, the original format of this 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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