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BEFORE THE
SUBCOMMITTEE ON DISABILITY ASSISTANCE AND MEMORIAL AFFAIRS
HOUSE COMMITTEE ON VETERANS' AFFAIRS**

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Mr. Chairman and members of the Subcommittee: Thank you for the opportunity to appear before you today to address training for Veterans Benefits Administration (VBA) claims adjudicators; the standards we use to measure their proficiency and performance; and how we communicate changes in laws, regulations, policy and procedures to field station staff. I am accompanied by Mr. James Whitson, Director of VBA's Eastern Area Office; Ms. Janice Jacobs, Deputy Director of VBA's Compensation and Pension Service; and Ms. Dorothy Mackay, Director of VBA's Office of Employee Development and Training.

Training

Training is central to every quality organization. VBA is committed to ensuring all employees have the opportunity to learn and develop the knowledge, skills, and abilities required to be successful in their current roles and to prepare them for positions of increasing responsibility and leadership. We therefore recognize training as a core element of VBA's infrastructure and key to our succession planning efforts. Ensuring an effective training program is especially critical as we hire new employees to replace many of our more experienced employees who are expected to retire over the next few years.

VBA has deployed new training tools and programs to provide a more consistent approach to training. Newly hired veterans service representatives (VSRs) receive a comprehensive and consistent foundation in claims processing

principles through a national centralized training program called “Challenge.” After this initial centralized training, employees follow a national standardized training curriculum at their home regional offices. This 23-week curriculum includes full lesson plans, handouts, student guides, instructor guides, and slides for classroom instruction. A consistent, nationally developed training program also is provided to newly appointed Rating VSRs (RVSRs).

Additionally, standardized computer-based tools have been developed for training decision-makers. The Training and Performance Support System or TPSS provides cooperative-learning modules centered on the skill sets required to become a fully functioning VSR or RVSR. These TPSS modules are also used as refresher training for experienced decision-makers. Currently, there are 27 TPSS modules available covering the claims and appeals processing functions of VSRs and RVSRs, with additional modules being developed. These modules are regularly updated and supplemented with on-the-job training at the regional office level, as needed.

The Electronic Performance Support Systems or EPSS provides VSRs and RVSRs with electronic job aides for immediate reference as they work cases. By responding to a series of questions based on the issue presented, EPSS guides claims adjudicators in the decision process. EPSS also offers tools that explain medical terminology and describe medical conditions to help decision-makers understand the severity and impact of claimed disabilities.

VBA also provides training to claims adjudicators through distance-learning technology. Satellite broadcasts are produced throughout the year on topics covering the full spectrum of issues including legislative and policy changes, the impact of court cases, and rating considerations for particular disabilities.

To ensure the trainers have the skills to make their training classes effective and engaging, VBA provides a week-long Instructor Development Course. All

trainers for national level training programs, such as “Challenge” training, must graduate from the Instructor Development Course.

An extensive training website provides another ready-reference tool to assist regional office employees. The website offers lesson plans, training guides, job aids, and other training materials to assist newly hired or journey-level VSRs and RVSRs. The website also contains links that cross-reference documents and web sites to reduce VSR or RVSR research time.

This fiscal year, the Under Secretary for Benefits established a policy requiring that regional offices provide all claims adjudicators with a mandatory 70 hours of job-specific training. Most other employees are required to be provided with at least 40 hours of training. In FY 2007, the mandatory training for claims adjudicators will increase to 80 hours.

VBA has established core requirements for this technical training, with Headquarters’ business lines and staff offices required to identify curricula for each major position in VBA. To ensure training is properly planned and executed, each regional office is now required to develop an annual training plan and report twice yearly on its training accomplishments. Regional office training plans and reports are reviewed in Headquarters to identify trends, training gaps (where more centrally provided content is needed), and local best practices that could be adapted for national use. Every facility receives written feedback on its training plan and progress. This process has resulted in enhanced consistency in training and has produced data on training trends, strengths, and areas for improvement. This process provides regular snapshots of the state of training in VBA and has increased accountability for ensuring employees receive quality training.

Dissemination of New Information and Changes to Field Employees

VBA ensures that regional offices are provided timely, accurate, and complete information on regulatory, statutory, and administrative changes, as well as any legal or judicial decisions that affect claims processing for our nation's veterans. This includes changes in policy and procedures that affect the way VBA does business, such as what to include in a letter informing a veteran on what is needed to substantiate his/her claim.

Field station employees receive this information through various delivery methods. The Compensation and Pension (C&P) Service issues guidance letters (called "Fast Letters") to advise field employees on policy and procedural changes and legal revisions. In 2005, the C&P Service issued 23 Fast Letters; 16 have been issued to date in 2006.

Decision Assessment Documents (DADs) are prepared following a precedent decision of the Court of Appeals for Veterans Claims (CAVC) or decision of the U.S. Court of Appeals for the Federal Circuit (Federal Circuit). DADs are also issued on precedent opinions of the Office of General Counsel. DADs explain the judicial holding, summarize the facts and reasoning of the particular case, and inform field employees of any impact on VBA. A DAD is typically prepared in the days following a court decision and then sent to field employees via electronic mail and posted on the C&P Service's website.

Additionally, the C&P Service maintains a separate page on its website specifically designed to encourage two-way communication between claims adjudicators and the C&P Service staff. There is a "Frequently Asked Questions" page that provides answers to questions posed by field station employees that were unable to be resolved at the local level or that have national policy implications. Questions are answered by subject matter experts who serve on a "Q&A" committee. Answers are categorized and indexed according to subject matter and date posted.

The C&P Procedures Manual is continually updated to incorporate guidance and changes communicated through Fast Letters, DADs, satellite broadcasts, etc. Notification of manual changes are sent to field employees by electronic mail and also posted on the C&P Service's website.

The C&P Service also communicates extensively with the field through Veterans Benefits Network (VBN) broadcasts. These broadcasts are designed to provide in-depth analysis and discussion on VBA procedures and policies by subject matter experts. They are generally taped, but frequently also transmitted live so field employees can call in questions or request on-the-spot clarification. In recent months, VBN has aired broadcasts on the Manual Rewrite Project and on the development of claims for post-traumatic stress disorder, which included practical case scenarios.

The C&P Service hosts monthly conference calls with veterans service center managers to discuss current "hot" topics. These calls provide an opportunity to clarify new and existing policies and procedures and address recent court cases. These live conference calls give field stations an opportunity to pose questions and concerns directly to the C&P Service for immediate feedback.

National Performance Standards for VSRs and RVSRs

Another VBA organizational cornerstone to improve the delivery of benefits and enhance accountability is our system of individual performance assessment. All VSRs and RVSRs are subject to national performance standards that are reviewed periodically and amended as necessary in response to changes in workload and claims processing procedures. Managers use an automated tool called ASPEN to track work items completed and measure VSR and RVSR performance. Local accuracy reviews are conducted for all decision makers using the national quality criteria (Systematic Technical Accuracy Review or STAR).

The genesis of the current performance standards for VBA's claims adjudicators was the review by former Secretary Principi's Claims Processing Task Force, which was chaired by Admiral Daniel L. Cooper prior to his appointment as Under Secretary for Benefits. The Task Force provided many recommendations to improve the efficiency and effectiveness of VBA claims processing, including reengineered organizational structures and business processes for adjudicating veterans' compensation and pension claims. This new claims processing structure, called the Claims Processing Improvement (CPI) Model, placed greater emphasis on consistency of process and accountability for results, and led to development of new national performance standards.

Teams were chartered and charged with creating national VSR and RVSR standards. The standards focused on the key elements of quality, productivity, customer service, and timeliness. The performance standards were tested at several pilot sites and revised based on feedback from those tests. Agreements were reached with the American Federation of Government Employees (AFGE) prior to implementation. The current VSR performance standards have been in effect since October 2005. A team of regional office directors, service center managers, rating coaches, and Headquarters staff is currently considering revising the RVSR standard based on recent business process changes, such as the consolidation of the pension maintenance and Benefits Delivery at Discharge workloads.

VBA's four Area Offices and the Office of Field Operations monitor performance at the regional office, area, and national levels for accountability purposes, as well as for performance trends.

Skills Certification Testing

In conjunction with the national performance standards, VBA has developed a certification process to assess job proficiency. By successfully demonstrating job proficiency through the certification process, an employee is promoted to the journey level, thereby linking job proficiency to pay grade. Through the national certification program, VBA is raising the skill levels of our core decision-makers and producing greater consistency in claims decisions.

The concept of skills certification originated in the late 1990s as part of VBA's Business Process Reengineering (BPR) effort. However, the initiative did not begin in earnest until January 2000 when an MOU was signed with AFGE announcing the adoption of a certification program for the VSR, RVSR, and Decision Review Officer (DRO) positions. The VSR position was selected for the pilot program.

In December 2000, VBA contracted with the Human Resources Research Organization (HumRRO), a nationally known research group that develops products and provides services to improve organizational performance, to assist in the development of a certification instrument. Since that time VBA subject matter experts have been working with HumRRO to design, develop, and validate an effective certification process that assesses the knowledge and readiness of VSR GS-996-10 incumbents for promotion to the GS-11 level. A mid-course review was conducted following the implementation of the CPI Model to ensure the validity of the certification instrument with respect to the new organizational structure and processes.

Prior to VSR Skills Certification, the career ladder for the VSR position ended at the GS-10 level. The higher level award review and authorization functions were performed by GS-996-11 Veterans Claims Examiners (VCE). Employees were selected for these VCE positions through merit promotion.

Beginning in late 2002, VSR job announcements began identifying the full performance level for VSRs at the GS-11 level, contingent upon successful

completion of certification testing. Through successfully passing the certification test VSRs demonstrate that they have the skills necessary to perform the full range of VSR duties, including independently working the most complex cases and reviewing and authorizing the work of others.

The certification process consists of a 100-question multiple-choice, open-book test given over the course of two sessions, one in the morning and one in the afternoon. VSRs have 2.75 hours to complete each session with an hour break between sessions. The test design is based on a blue print of knowledge areas developed by subject matter experts. VSRs are provided access to on-line references and invited to bring any other reference material to the test site, including individually prepared notes. To pass the test, VSRs must achieve a minimum overall score and a minimum score on the compensation portion of the test.

The first validation test was performed in August 2003. There were 298 participants in the first test. Of these, 75 passed for a pass rate of 25 percent. While this was a lower national pass rate than anticipated, we were confident that the instrument would advance only those with the skills and abilities to perform at the GS-11 level. In many cases, the test results were consistent with the predictions of local managers as to who would pass and who would not. Modifications were made to the instrument and test administration process to address some of the validation test findings. As an example, the time allotted for taking the test was increased, as was the break period between the morning and afternoon session.

VBA conducted a second validity test in April 2004. There were 650 participants in the second test. Of these, 188 passed for a pass rate of 29 percent. Despite the continued low pass rate, HumRRO found a significant correlation between performance on the test and an assessment of on-the-job performance, further confirming the validity of the test instrument. Following

each administration of the test, AFGE was provided with a copy of the reported findings and analysis produced by HumRRO, along with informational briefings.

With low pass rates on the first two validation tests, a 20-hour VSR “readiness” training curriculum was developed to prepare VSRs for certification testing. The training is mandated for all VSRs who volunteer to sit for the test. We believe the combination of local and centralized training programs, along with certification “readiness” training, will not only improve pass rates, but will result in a work force better prepared to provide quality service to veterans.

A third test was administered on May 3, 2006, to 934 VSRs nationwide. During administration of the afternoon portion of the test, a problem was discovered. Multiple test items from the morning portion of the test were duplicated on the afternoon version. After consultation with HumRRO, it was decided that the best way to ensure a fair assessment of the candidates’ ability to perform at the GS-11 level was to have the candidates complete the test items that should have been delivered during the afternoon session. On June 7, the correct afternoon version of the test was administered. The May/June administration of the test resulted in an improved pass rate of 42 percent.

VBA has to date promoted 633 VSRs to the full-performance GS-11 level through the certification testing process. We are confident that we have developed a valid assessment tool and certification process to raise the skill level of our VSRs. Both the instrument and process are constantly reviewed, updated, and adjusted to ensure the right skills are being tested and that employees who are successful on the test are successful on the job. We are in the process of expanding skills certification testing to the RVSR position for those seeking to progress from the GS-11 level to the GS-12 journey level.

Mr. Chairman, this concludes my testimony. I greatly appreciate being here today and look forward to answering your questions.