

VA Office of Inspector General

OFFICE OF AUDITS AND EVALUATIONS



Veterans Benefits Administration

*Audit of
the National
Pension Call Center*

November 1, 2017
16-03922-392

ACRONYMS

BAS	Benefits Assistance Service
EST	Eastern Standard Time
FY	Fiscal Year
IRIS	Inquiry Routing and Information System
NPCC	National Pension Call Center
NTC	National Training Curriculum
OFO	Office of Field Operations
OIG	Office of Inspector General
PSETS	Privacy and Security Event Tracking System
PII	Personally Identifiable Information
PMC	Pension Management Center
TMS	Talent Management System
VA	Department of Veterans Affairs
VARO	VA Regional Office
VBA	Veterans Benefits Administration

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Highlights: Audit of VBA's National Pension Call Center

Why We Did This Audit

The National Pension Call Center (NPCC) handles all calls related to the processing and administration of the VA's pension program, the dependency, indemnity, and compensation program, as well as the processing of claims for burial and accrued benefits.

According to the Veterans Benefits Administration's (VBA) FY 2016 *Annual Benefits Report*, in FY 2016, more than 491,000 veterans and their survivors received pension benefits totaling an estimated \$5.1 billion. During the same year, NPCC agents answered about 272,500 calls. This audit sought to determine whether the NPCC is providing timely and quality assistance to veterans and their families.

What We Found

VBA management needed to improve the NPCC's oversight of quality review and training processes. More specifically, NPCC supervisors did not review or take corrective actions for calls evaluated by quality-review specialists. Calls in Spanish were not included in the Benefits Assistance Service (BAS) quality-review monitoring, and NPCC management and call agents did not complete or properly record all required training.

This occurred because the NPCC coach, who is responsible for the oversight of NPCC operations and staff, did not implement a process requiring corrective actions to address low-scoring quality

review results. In addition, BAS has never had a quality-review specialist fluent in Spanish to evaluate calls made by Spanish-speakers to the NPCC, even though from January 1 through June 30, 2016, the NPCC received more than 10,700 calls in that language. Then, the NPCC had five agents fluent in Spanish to assist Spanish-speaking callers.

The NPCC and BAS management provided inadequate oversight to ensure staff received or completed the required training. The NPCC coach provided inadequate oversight of the training coordinator. In FY 2016, the training coordinator was responsible for ensuring the completion of the required annual training classes for the NPCC staff. The required annual training for each staffer was included in the National Training Curriculum (NTC). For each staff member, the number of required training hours ranged from 285 (for newly hired agents) to 40 (for supervisory or support staff). At the time of our review, the newly hired agents and one quality-review specialist had completed their required annual training. The NPCC coach did not assign a new training coordinator until September 2016.

Moreover, BAS training staff erroneously used total training hours completed to determine compliance with the NTC. Since NPCC staff completed additional training courses along with those required by the NTC, the evaluation of the completed required classes using total training hours was inaccurate.

VBA management lacked reasonable assurance that the NPCC's hours of

operation provided sufficient availability for pension recipients to speak with a call agent. From January 4, 2016 through April 3, 2017, about 70,500 pension calls were placed to the NPCC after it had closed. This occurred because VBA management did not analyze the available call data to determine the number of calls that go unanswered after the NPCC's close of business day, namely, 5 p.m. eastern standard time.

Finally, Philadelphia VA Regional Office (VARO) staff mailed documentation that included personally identifiable information (PII) to incorrect addresses and someone other than the intended veteran received the information. The Philadelphia VARO houses the NPCC and the VARO Director oversees the NPCC personnel. During our real-time quality monitoring of incoming calls at the NPCC, a veteran's daughter called the NPCC to inform an agent that her father had received another veteran's correspondence.

From January 1 through June 30, 2016, the Philadelphia VARO reported there had been 58 incidents of VBA correspondence with PII being received by someone other than the intended recipient. This occurred because the Philadelphia VARO's controls for outgoing mail processes needed strengthening. Sending a veteran's PII to someone other than the intended recipient violates VA rules and increases the likelihood of identity theft.

What We Recommended

We recommended the Acting Under Secretary for Benefits take these corrective actions:

- Implement controls to ensure callers receive accurate and complete responses to pension inquiries

- Ensure BAS has qualified staff to evaluate the quality of Spanish-speaking calls received at the NPCC
- Implement controls to ensure required training is completed and recorded timely
- Continuously evaluate the NPCC call data for calls made outside of normal business hours

We also recommended the Philadelphia VARO Director strengthen controls at the Philadelphia VARO to ensure documents that include PII are mailed to the intended veteran.

Agency Comments

The Acting Under Secretary for Benefits concurred with our findings and recommendations. We considered the corrective action plans acceptable and will follow up on their implementation.



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INTRODUCTION

Objective

This audit sought to determine whether the Veterans Benefits Administration's (VBA) National Pension Call Center (NPCC) is providing timely and quality assistance to veterans and their families.

NPCC

The VA's pension program provides monthly benefits payments to qualified wartime veterans and their survivors with financial need. In 2008, VBA consolidated all pension work and established three Pension Management Centers (PMC). The PMCs are colocated and under the jurisdiction of VA regional offices (VARO) located in Milwaukee, WI; Philadelphia, PA; and St. Paul, MN. In September 2008, VBA established the NPCC, which is housed at the Philadelphia VARO. According to VBA's FY 2016 *Annual Benefits Report*, in FY 2016, more than 491,000 veterans and their survivors received pension benefits totaling an estimated \$5.1 billion.

The Philadelphia VARO Director oversees the NPCC personnel, which amounted to 79 employees—as of September 2016. According to VBA's Office of Field Operations' (OFO) Contact Operations Manager, OFO is responsible for daily activities and functions of all the national call centers, including the NPCC. The NPCC handles all calls related to the processing and administration of VA's pension program, the dependency, indemnity, and compensation program, as well as the processing of claims for burial and accrued benefits. The NPCC supports the Philadelphia, Milwaukee, and St. Paul PMCs by assisting callers and responding to inquiries regarding pension claims under their jurisdictions.

In September 2013, VBA contracted with Verizon/Genesys and Verint to provide an automated call-distribution system and call-recording system. Verizon/Genesys provided real-time agent activity and was available throughout the workday. Verint was a system that captured and recorded 100 percent of incoming calls, which could be listened to live or later in a recorded format. As well, the Verint system was used for quality reviews and training purposes by allowing continual feedback on actual calls. Our audit evaluated data and operations from January 1 through June 30, 2016 while Verizon/Genesys and Verint were performing these services.

In August 2016, VBA awarded a contract to AT&T Technical Services Company, Inc. to provide the NPCC with Cisco and NICE, a new automated call-distribution and call-recording system. Cisco and NICE offered the NPCC the same basic functionality that Verizon/Genesys and Verint provided. According to OFO's Contact Operations Manager, the systems were changed to allow agents to work remotely and included advanced features such as a more user-friendly menu. The NPCC began using the new systems on September 16, 2016.

We also reviewed the new systems' functionality and telephone activity for answered, blocked, and missed calls from October 1, 2016 through May 31, 2017.

**Benefits
Assistance
Service**

VBA established the Benefits Assistance Service (BAS) to provide policy, direction, and coordination for all direct services and outreach activities, including centralized oversight and technical assistance for all national call centers. BAS included 75 staff of which 34 were assigned to BAS's Quality and Training Division. Generally, this division monitors operations, such as evaluating NPCC calls and agent training, and identifies best practices to assist the call center in achieving high performance. Eight of the 34 staff in this division evaluated calls at the NPCC.

Workload

In FY 2016, the NPCC reported that its agents answered about 272,500 calls—a decrease from FY 2015's total estimated 287,100 calls answered.

RESULTS AND RECOMMENDATIONS

Finding 1 **VBA Needed To Improve the National Pension Call Center's Oversight of the Quality Review and Training Processes**

VBA management needed to improve the NPCC's oversight of quality review and training processes. NPCC supervisors did not review or take corrective actions for calls evaluated by quality-review specialists. Furthermore, despite having a dedicated queue for Spanish-speaking pensioners, calls made in Spanish are not included in BAS quality-review monitoring. NPCC staff also did not complete or properly record all required training.

This occurred because the NPCC coach did not implement a process requiring corrective actions for low-scoring quality evaluations. In addition, BAS does not have a quality-review specialist who understands and speaks Spanish to evaluate those calls received on the Spanish-speaking queue at the NPCC. BAS and NPCC management provided inadequate oversight to ensure staff received or completed the required training. Improving NPCC's quality-review monitoring program will provide increased assurance that veterans and their families receive accurate responses to their pension inquiries so they may obtain timely and accurate benefits.

Call Quality Review Monitoring

In 2012, VBA established Quality Review teams to help ensure the quality of service provided to veterans and other callers contacting the NPCC. Quality-review specialists evaluate and score a random monthly sampling of calls and assess agents' performance using VBA's Quality Management Call Quality Evaluation Guide and Scorecard. Before September 16, 2016, calls were randomly sampled from Verint. Afterward, calls were sampled from NICE, the new call-recording system. NPCC and BAS quality-review specialists monitor calls each month, concentrating their efforts in several areas of both technical and customer relations accuracy. The NPCC evaluates five calls per agent per month and BAS evaluates 50 NPCC calls per month.¹ From January 1 through June 30, 2016, NPCC agents answered an average of 468 calls per month. The rating criterion has a specific point value that collectively provides a final evaluation score for each call monitored.

VBA only uses BAS call quality evaluation scores to calculate the monthly overall call quality measure included on the VBA Director Dashboard. According to the VBA Director Dashboard, for FY 2016, NPCC met the

¹ Beginning October 1, 2016, BAS began evaluating 70 NPCC calls per month.

overall call quality national average target of 87 percent. NPCC's overall call quality² scores have improved each fiscal year since FY 2011.

Table 1 shows the VBA Director Dashboard national targets and average scores for NPCC overall call quality from FY 2011 through FY 2016.

Table 1. NPCC's Overall Call Quality National Targets and Average Scores for FYs 2011–2016

Overall Call Quality (by fiscal year)	National Target (percentage)	Average Scores (percentage)
2011	85	57
2012	83	72
2013	83	76
2014	85	85
2015	85	86
2016	87	87

Source: VBA Director Dashboards. Numbers are rounded.

Monitored
NPCC
Calls
Reviewed

From January 1 through June 30, 2016, the quality-review specialists evaluated 1,476 calls and scored 367 of those calls below the national target of 87 percent. The 367 calls scored ranged from 29 to 86 percent. We verified and validated the accuracy of the call quality evaluations using VBA's Quality Management Call Quality Evaluation Guide and Scorecard by reviewing a statistical sample of 110 of 1,476 calls. We determined that the quality-review specialists accurately completed call quality evaluations. However, we noted that the quality-review specialists assessed a score below the 87 percent national target for 50 of the 110 calls we reviewed. For 12 of the 50 evaluated calls, quality-review specialists found that NPCC agents did not provide accurate information or take appropriate action in response to callers' inquiries. These examples describe some of those inaccuracies:

Example 1

An agent incorrectly advised a veteran's widow that a survivor's claim could not be expedited because of a hardship based on poor health. However, according to VBA's M21-1, *Part III, Subpart ii, Chapter 1, Section D - Claims That Require Priority Processing*, a survivor's claim can be expedited in a hardship situation, including poor health and terminal illness.

² Appendix A describes and defines overall call quality and NPCC's other four performance measures.

Example 2 An agent did not complete VA Form 21-0966, *Intent to File*, following a call from a veteran on January 8, 2016. This form is used to notify VA of the veteran's intent to file a claim for benefits. The veteran called again on January 12, 2016 and the *Intent to File* form was completed by another agent.

Example 3 An agent told a caller that prepaid burial expenses were not refundable even though VBA's M27-1, *Benefits Assistance Service Procedures*, requires that agents not make absolute statements regarding benefits or claims. The agent should have instructed the caller on the proper procedures to file a reimbursement claim.

Reason This Occurred The NPCC coach did not require supervisors to follow up on evaluated calls with scores below 87 percent (the national target) to assess whether corrective action was needed. Each month, quality-review specialists provided these evaluation scores to the agents and to a supervisor for review. NPCC management did not have a policy or procedure requiring corrective actions for low-scoring quality evaluations. The coach and supervisors had not identified the need for such policy or procedure before our audit.

Furthermore, the NPCC coach did not require supervisors to receive notification from the quality-review specialists when an evaluated call requires corrective action as a result of the agent's error. NPCC supervisors reported that they met monthly with call agents to discuss their individual performance standards. Agents' performance standards included call quality based on the scores from NPCC-evaluated calls, duration of calls to ensure maximum numbers of callers were served each day, their availability to callers, and training. However, their discussions did not specifically address the evaluated calls that fail to meet the performance standard or target score. Typically, supervisors do not review individual call evaluations conducted by BAS. VBA clearly has not been doing all that is possible to ensure veterans and their families receive timely and accurate information.

Spanish-Speaking Calls Excluded From Quality Reviews At the NPCC, VBA has a dedicated phone queue for calls made in the Spanish language. The NPCC call system routed those calls to a Spanish-speaking phone queue where NPCC's five Spanish-speaking agents assisted the callers. Verint (as of September 2016, the NICE system) records the audio for all NPCC-answered calls, both in English and in Spanish. However, Verint and NICE systems are only capable of recording 20 percent³ with screenshots.⁴ The calls with screenshots are randomly

³VBA was not able to maintain one year of all audio recordings and 20 percent of screenshots because of a storage limitation. As a result, from March 2 through March 26, 2017, only 10 percent of calls with screenshots were recorded from NICE. As of March 27, 2017, VBA was able to record 15 percent of calls with screenshots from NICE.

⁴ Screenshots allow the quality-review specialist to review the agents' movement and those applications used while they responded to a call.

selected by the systems. BAS quality-review specialists only evaluate a random sample of calls with screenshots. However, BAS did not conduct quality reviews for callers who converse in Spanish. When a Spanish-speaking call was picked during the random selection, it was replaced by an English-speaking call. From January 1 through June 30, 2016, the NPCC received about 136,000 calls. This included more than 10,700 Spanish-speaking calls that were excluded from the universe of quality-call monitoring.

The BAS Chief of Quality Services told us that BAS did not evaluate the calls made in Spanish because there has never been a BAS quality-review specialist fluent in Spanish. We estimated that by not having a Spanish-speaking quality-review specialist, approximately 2,145 calls⁵ were excluded from the available captured calls for review, from January 1 through June 30, 2016. As a result, the BAS Chief of Quality Services cannot ensure Spanish-speaking veterans and veterans' representatives receive quality responses to their telephone inquiries.

BAS National Training Curriculum

The BAS National Training Curriculum (NTC) encompasses required annual training for all agents, coaches, managers, training coordinators, leads, quality-review specialists, management analysts, and program support assistants at the NPCC. The NTC is adjusted each year and courses include specific topics identified by BAS based on national quality trends and emerging issues. These courses, designed to build skills and abilities of the employees, offer both technical and developmental training. The training requirements ranged from 285 hours for a newly hired agent to 40 hours for supervisory or support staff. Agents are scheduled to complete at least two hours of training weekly in instructor-led or online course in the VA Talent Management System (TMS).

Training Management Not Effective

We reviewed NPCC training records to determine whether FY 2016-required training was completed and properly documented in TMS. We reviewed 10 of 52 NPCC agents hired in FYs 2015 and 2016, which included training completed for five newly hired and five experienced agents. Newly hired agents are trainees until they have spent a year in the position, after which they are considered experienced agents. In addition, we reviewed training records for NPCC's seven supervisory staff, three quality-review specialists, and the training coordinator.

For the training records we reviewed, NPCC staff completed courses and the total training hours exceeded the number of hours NTC required. However,

⁵ We estimated BAS universe of Spanish-speaking calls excluded from the available captured calls for review by taking the total number of Spanish calls answered by NPCC during our scope period (10,723 calls), and multiplied it by 20 percent. Verint records the audio for all answered calls, but is only capable of recording 20 percent of the answered calls with screenshots.

these staff did not complete all the required training hours identified in the FY 2016 BAS NTC. As well, training was not properly recorded in TMS, making the training records and the accuracy of the guidance provided to the agents unreliable. Therefore, the NPCC coach did not effectively manage training. Training is critical to ensure agents stay current on laws and regulations, work processes, policies and procedures, as well as computer applications, to provide optimum service to the veterans and other customers who contact the NPCC.

Newly Hired Agents Training

Our review of the agents' training records determined that the newly hired agents completed all required NTC training. Each newly hired agent is required to complete 91 courses, for a total of 285 hours. These courses included training on VBA pension benefits, customer service skills, and the proper use of VBA's systems.

Experienced Agents Training

Our review of the experienced agents' training records determined that the experienced agents completed just over 50 percent of the required refresher training. For example, call agents did not complete refresher training for Death-Related Inquiries, Disability Compensation, and Pension courses.

Table 2 shows the number of required training hours and the number of hours completed for each agent in our sample.

Table 2. Training Hours Experienced Agents Required To Complete and Hours Actually Completed for FY 2016

Experienced Agents	Hours Required	Hours Completed	Percentage Completed
Agent 1	80	42	52
Agent 2	80	43	53
Agent 3	80	41	51
Agent 4	80	41	51
Agent 5	80	42	52

Source: OIG Analysis of TMS Training Records. Training hours are rounded.

Quality and Supervisory Staff Training

We also reviewed training records for the NPCC training coordinator, three quality-review specialists, and seven supervisory staff. One of the three quality-review specialists completed all required training in the NTC. Similarly to the experienced agents, the remaining staff did not complete all NTC-required training. Training is a critical element for assistant coaches and lead agents because they are responsible for mentoring agents and addressing individual training needs.

Table 3 shows the number of required training hours and the number of hours completed for each position in which the required training was not completed.

**Table 3. Training Hours
NPCC Quality and Supervisory Staff Required To Complete
and Hours Actually Completed for FY 2016**

Position Title	Hours Required	Hours Completed	Percentage Completed
Coach	41	25	60
Assistant Coach 1	41	24	58
Assistant Coach 2	41	19	46
Assistant Coach 3	41	1	2
Assistant Coach – New	45	4	9
Lead Agent 1	40	25	63
Lead Agent 2	40	6	15
Training Coordinator	43	17	39
Quality-Review Specialist – New	41	20	47
Quality-Review Specialist	40	35	88

Source: OIG Analysis of TMS Training Records. Training hours are rounded.

*Reliability of
Training Records*

Training in TMS was overstated and not properly recorded, rendering the records unreliable. The total completed training hours documented in TMS for the experienced agents and supervisory staff ranged from 231 to 356 hours in FY 2016. However, total training hours included duplicate courses—courses completed or just recorded more than once in TMS. For example, one agent had a total of 279 training hours recorded, of which 120 hours were for duplicate courses.

In addition, NPCC staff did not timely record their training hours in TMS for instructor-led courses to demonstrate reasonable progress toward completing the required training and to ensure training was properly recorded. Our review of TMS training records for experienced agents showed that more than 70 percent of all training completed during FY 2016 was recorded in TMS on the same date; two weeks before the end of the fiscal year ending on September 30.

According to the Philadelphia VARO training manager, once the instructor-led training is completed, the agents are required to go into TMS to complete the course evaluation or assessment the same day. Once the

agents have completed the course evaluation or assessment, TMS records the training hours for the course. The previous training coordinator did not monitor training hours to ensure agents completed the required course evaluations or assessments in TMS after finishing instructor-led training.

The NPCC coach assigned a new NPCC training coordinator on September 4, 2016. This individual explained how he would review TMS to evaluate the training completed; he found that many of the training hours had not been recorded in TMS when he began his new position. So, he would manually enter the training in TMS to record the training hours completed.

*Reasons
This Occurred*

The NPCC coach did not provide adequate oversight of the training coordinator and did not ensure agents completed the required course evaluations or assessments for training timely. During FY 2016, the training coordinator was responsible for ensuring the completion of the required training classes, course evaluations, and comprehension assessments for NPCC staff. In addition, the training coordinator was responsible for submitting quarterly training reports to BAS to demonstrate reasonable progress toward the annual training requirement. However, BAS training staff erroneously used total training hours completed to determine compliance with the NTC. Since NPCC staff completed additional training courses along with those required by the NTC, the evaluation of the completed required classes was inaccurately reported.

When required training is not completed, the NPCC cannot ensure accurate guidance is provided to agents. In addition, if training is not recorded timely into TMS, VBA cannot ensure that NPCC staff are making reasonable progress toward completing annual training requirements. Moreover, the opportunity to modify training schedules or to provide additional guidance for completing training is missed.

Conclusion

NPCC management needed to improve its oversight of the quality-review process to ensure agents provide quality responses to callers. Call quality reviews and evaluations help ensure veterans and their families receive accurate and complete responses to their inquiries. However, without procedures requiring agents and supervisors to review and take corrective action on evaluated calls, and by excluding calls made by Spanish-speaking customers from the evaluation process, the effectiveness of these quality controls decreases.

In addition, training is a critical element to ensure agents provide quality and accurate responses to callers. When NPCC staff and supervisors do not complete the required training, VBA management cannot ensure it provides accurate and complete assistance to callers. Furthermore, VBA management cannot ensure that NPCC staff are making reasonable progress toward completing annual training requirements. Training courses should be

carefully reviewed to ensure the required courses are completed and recorded timely in TMS.

Recommendations

1. We recommended the Acting Under Secretary for Benefits ensure National Pension Call Center management implements controls to require supervisors to review and take corrective actions for inaccuracies identified when evaluating calls.
2. We recommended the Acting Under Secretary for Benefits ensure Benefits Assistance Service has qualified staff to evaluate the quality of Spanish-speaking calls received at the National Pension Call Center.
3. We recommended the Acting Under Secretary for Benefits ensure National Pension Call Center and Benefits Assistance Service management implements controls to help ensure staff comply with all training requirements identified in the Benefits Assistance Service National Training Curriculum.
4. We recommended the Acting Under Secretary for Benefits ensure National Pension Call Center management implements controls to ensure staff complete course evaluations or assessments for instructor-led training in the Talent Management System to record training hours timely.

Management Comments

The Acting Under Secretary for Benefits concurred with our recommendations. BAS updated the VBA's M27-1, *Part IV. Chapter 1 Section 1 - Quality* to define requirements for establishing a standard operating procedure to ensure all deficiencies identified during local-(NPCC) and BAS-conducted quality reviews are appropriately addressed and all necessary corrective actions are resolved. Also, BAS will coordinate with the OFO and Philadelphia VARO to ensure the appropriate controls are implemented. The next position BAS announces to fill on the Quality Client Services team will include the requirement that the individual be bilingual and able to properly evaluate Spanish-speaking calls received at the NPCC. BAS will implement a monthly in-depth training analysis and report for each call center. This will assess compliance with all established procedures, identify necessary actions, and recommend training opportunities based upon identified deficiencies. OFO will ensure the NPCC implements the appropriate controls to ensure staff are completing the necessary course evaluations and/or assessments for instructor-led training in TMS, in order to record training hours timely. Appendix D provides the full text of the Acting Under Secretary's comments.

**OIG
Response**

The Acting Under Secretary for Benefits' corrective action plans are responsive to the intent of the recommendations. We will monitor implementation of the planned actions and will close the recommendations when we receive sufficient evidence demonstrating progress in addressing identified issues.

Finding 2 **VBA Needed To Ensure the National Pension Call Center Provide Timely Assistance**

VBA management lacked reasonable assurance that the NPCC's hours of operation provided sufficient availability for pension recipients to speak with a call agent. This occurred because VBA management did not evaluate available call data to determine the number of calls that go unanswered after the NPCC business day closed at 5 p.m. eastern standard time (EST). As a result, VBA management lacked information to determine the effect the NPCC's hours of operation have on pensioners, including the estimated 246,100⁶ pension recipients who resided outside of the eastern time zone.

We also reviewed the NPCC's blocked-call rate and average wait time for our audit scope from January 1 through June 30, 2016. Blocked-call rates measure the percentage of incoming calls during hours of operation that go unanswered because all agents are unavailable. Average wait time is a measurement in seconds of the average amount of time a caller waits before the call is answered. According to FY 2016 VBA Director Dashboard, the blocked-call rate target was 45 percent and the average wait-time target was 500 seconds (8 minutes and 33 seconds).

The NPCC met the average wait-time target during our audit scope but did not meet the blocked-call rate target of 45 percent for the first two months of our six-month audit scope. The NPCC coach indicated this occurred because the NPCC was not properly staffed to handle all incoming calls. This was due to a 2015 hiring freeze issued by the Deputy Under Secretary for Benefits. The hiring of additional agents in May 2016 has significantly improved this rate. The blocked-call rate significantly decreased from 53 percent in January 2016 to less than 1 percent in December 2016. We tested the accuracy of the NPCC's blocked-call rate by analyzing all call data from Verizon/Genesys and Cisco. By dividing the total blocked calls by the total calls attempted, we determined the rates were accurately reported. Beginning in FY 2017, the NPCC set the new blocked-call rate target at zero.

NPCC Agent Accessibility

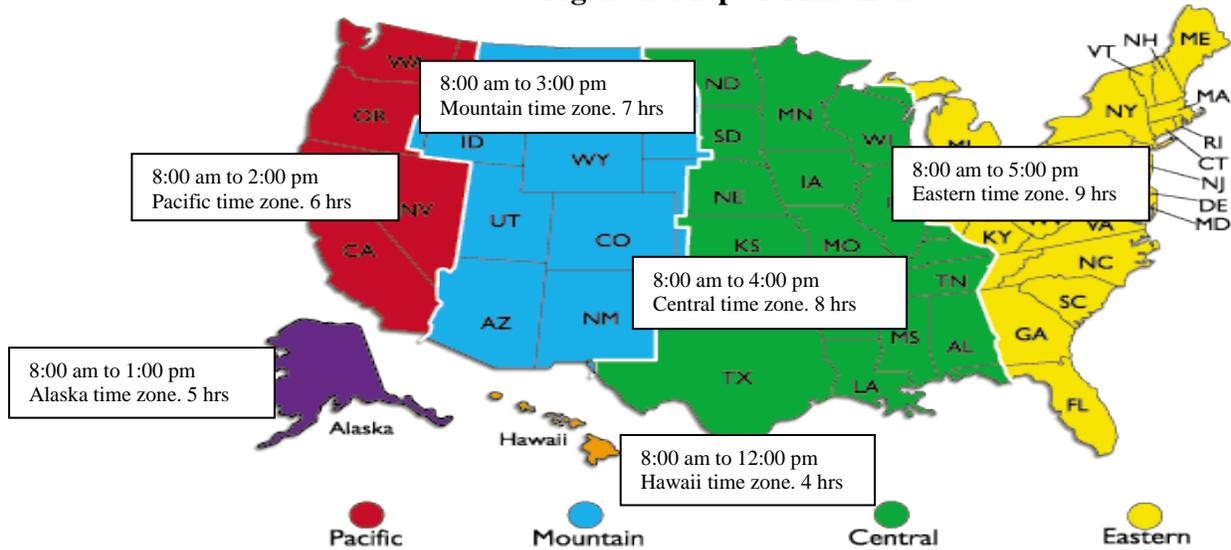
VBA established a dedicated toll-free telephone number specifically for veterans to call with inquiries about pension benefits. Call agents located at the NPCC have specialized knowledge and training to provide assistance to veterans and their families on all matters related to pension benefits. However, the hours of operation for the NPCC are based on the eastern time zone of 8 a.m. to 5 p.m. EST (nine hours). Depending on where a veteran

⁶ In FY 2015, VA's National Center for Veterans Analysis and Statistics reported about 64,100 pension recipients in the states under the Pacific time zones and about 900 and 400 pension recipients in Hawaii and Alaska, respectively. In addition, it reported about 26,400 and 154,300 in the states under the Mountain and Central time zones, respectively.

lives, this results in a limited amount of time to call and speak with an agent during a normal business day that begins at 8 a.m. in other time zones.

Figure 1 displays a map of U.S. time zones and the hours available to callers to speak with a call agent during a normal business day that begins at 8 a.m.

Figure 1. Map of Time Zones



Source: OIG-created map of U.S. time zones

The NPCC Consolidation Plan letter dated April 17, 2008 indicated telephone lines would be open from 7 a.m. to 7 p.m. EST during the transition and consolidation period of the NPCC. The stated transition and consolidation period began September 15 and ended November 24, 2008. The OFO's Contact Operations Manager provided historical information that indicated the lines remained open from 7 a.m. to 7 p.m. through December 2008. In July 2009, the NPCC was given temporary authority by the former director of the Eastern Area Office of Operations to amend the hours of operation to 8 a.m. until 5 p.m. EST, according to an email from the former PMC assistant manager. In 2009, these hours of operation became permanent. The OFO's Contact Operations Manager provided documentation showing that the NPCC call volume did not support continuing the 7 a.m. to 7 p.m. operating hours.

The VBA's OFO gave us the closed-calls data generated by Verizon/Genesys and Cisco for the period of January 4, 2016 through April 3, 2017; about 70,500 pension calls were made to the NPCC after it closed. The data encompass a typical workweek—Monday through Friday—and do not include weekends or holidays. During our six-month audit scope period, about 135,600 calls were answered during normal business hours by NPCC agents. The available data showed there were about 34,100 additional calls (25 percent) that went unanswered during the

same period because the NPCC was closed. To evaluate further, we requested and obtained current call data for March 2017, which included 23 business days and over 29,900 calls. Since the NPCC closes at 5 p.m. EST and the national call centers did not close until 9 p.m. EST, we reviewed the number of NPCC calls received from 5 to 9 p.m. to determine the number of calls the NPCC missed. During March 2017, from 5 to 9 p.m. EST, more than 3,200 calls went unanswered because the NPCC was closed.

When calls are received at the NPCC after 5 p.m. EST, a recorded message informs the callers that the NPCC is closed and directs them to the eBenefits.gov website. eBenefits.gov is another option available to veterans and their families to inquire about pension benefits. eBenefits.gov provides resources and self-service functions, such as registering veterans for access to services, updating direct deposit information, viewing the status of disability compensation or pension claims, and uploading documents to support compensation or pension claims. However, it does not have the capability for veterans to ask questions and obtain responses concerning their benefits. Instead, eBenefits.gov directs veterans to use the Inquiry Routing and Information System (IRIS) for their inquiries or to contact the national call centers for immediate assistance.

IRIS is VA's internet-based public-message management system used to send personal data, make claims inquiries, and ask general questions. We requested data from the VBA to determine if veterans receive timely responses to their pension inquiries when routed to IRIS. From January 1 through June 30, 2016, the data provided showed VBA responded to approximately 2,340 inquiries related to pension benefits with an average response time of 24 days. However, from January 1 through June 30, 2017, the data provided showed VBA responded to about 1,280 pension inquiries with an average response time of three days. According to the BAS Chief of Training Services, VBA was able to significantly improve the timeliness of IRIS responses by rightsizing VBA's contact centers.

Veterans and their families have other options for getting their pension inquiries addressed—by using IRIS or calling national call centers. However, they might wait days for a response when referred to IRIS, as compared to the more timely responses provided by call agents at the NPCC. In addition, even though contacting the national call centers provides another option for veterans, these call agents do not have the specialized knowledge and additional training needed to answer pension inquiries. Therefore, VBA should study the feasibility and benefits of expanding the NPCC's hours of operation.

Reason This Occurred

VBA management did not evaluate the available call data to determine the number of calls that go unanswered after the NPCC closes. Unanswered call data were not reviewed before or after the implementation of the new Cisco system. The NPCC reviewed only call data from Verizon/Genesys and

Cisco that included the number of calls answered, blocked, abandoned, and attempted. Although data were available to VBA management for calls made after closing, they were not reviewed. Evaluating the number of calls made after normal business hours would help VBA identify the potential need to modify the hours of operation at the NPCC. Increasing the operating hours would help ensure that all callers have adequate time to contact the NPCC and speak to agents.

For example, VA's National Center for Veterans Analysis and Statistics reported that, in FY 2015, more than 64,000 pension recipients resided in the Pacific time zone. During this same period, more than 900 pension recipients resided in Hawaii and nearly 400 in Alaska. These veterans and their representatives only have six hours or less to contact the NPCC and speak with a call agent if their standard business day begins at 8 a.m. Conversely, veterans who call from the eastern time zone have nine hours each business day to speak with an agent.

**Blocked
Call Rate**

VBA performance measures determine accessibility to call agents, such as the call center's blocked-call rate. According to OFO's Contact Operations Manager, a call is considered blocked when the caller receives a recorded message stating that agents are unavailable to take the call at this time. The recording also directs the callers to eBenefits.gov or instructs them to call again.

We reviewed the NPCC's blocked-call rate and average wait time for our audit scope spanning from January 1 through June 30, 2016. According to the FY 2016 VBA Director Dashboard, the blocked-call rate target was 45 percent while the average wait-time target was 500 seconds (8 minutes and 33 seconds).

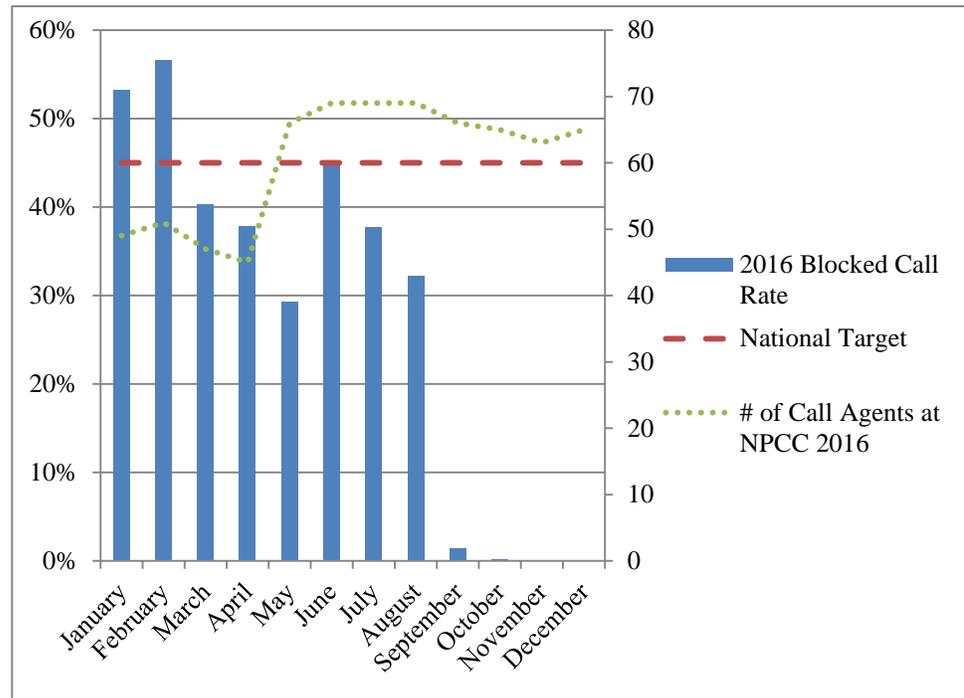
According to OFO's Contact Operations Manager, the 45 percent target was set by reviewing industry standards, and analyzing wait times and blocked calls. We tested the accuracy of the NPCC's blocked-call rate by analyzing all call data from Verizon/Genesys and Cisco. We verified that VBA accurately reported the NPCC's blocked-call rate on the Director Dashboard by dividing the total blocked calls by the total calls attempted. In October 2016, VBA OFO management re-evaluated the business conditions and factors that established the blocked-call rate and subsequently revised the target. The new blocked-call rate target of zero was effective at the beginning of FY 2017.

During our audit scope, the NPCC met the average wait-time target but did not meet the blocked-call rate target for two of six months (See Figure 2). We determined that the NPCC's blocked-call rate affected veterans' ability to reach an agent. The NPCC coach indicated this occurred because the NPCC was not properly staffed to handle all incoming calls following a 2015 hiring freeze issued by the Deputy Under Secretary for Benefits.

Specifically, from July 2015 through April 2016, until the hiring freeze was lifted, staffing was reduced by 24 agents. In May 2016, the NPCC hired an additional 25 agents—which reduced the blocked-call rate. The blocked-call rate significantly decreased from 53 percent in January 2016 to less than 1 percent in December 2016; therefore, no recommendation was made for this issue.

Figure 2 shows the NPCC blocked-call rates as compared to the FY 2016 national blocked-call rate target of 45 percent and to the number of NPCC agents available from January through December 2016.

Figure 2. NPCC Blocked-Call Rate and Number of Agents



Source: *OIG Analysis of VBA FY 2016 and FY 2017 Director Dashboard and NPCC agent staffing from January to December 2016 obtained from the NPCC*

Conclusion

VBA’s OFO management cannot ensure the NPCC’s hours of operation provide adequate availability for pension recipients to speak with a call agent. The VBA Director Dashboard does not include a measure to capture the number of pension recipients calling outside of normal business hours but the data are available to VBA. Callers residing outside the eastern time zone, where the NPCC is located, may be limited in their capability to reach an NPCC agent who is specifically trained and specialized to provide timely and accurate responses to pension inquiries. Callers would benefit if VBA’s OFO evaluated the calls received after hours to determine whether the NPCC is providing adequate access to veterans, including those who reside outside the eastern time zone.

Recommendation

5. We recommended the Acting Under Secretary for Benefits continuously evaluate the NPCC Cisco data and determine if a plan is needed to modify operating hours to accommodate callers, including those residing outside the eastern time zone.

Management Response

The Acting Under Secretary for Benefits concurred with our recommendation. OFO will develop a plan to evaluate and review the NPCC after-hours Cisco data to determine if operating hours need to be extended or adjusted. OFO will gather and analyze the after-hours Cisco data at the end of the first quarter of FY 2018. The results of this assessment, along with the decision on whether the operating hours need to be extended or adjusted, will be provided by the end of January 2018. Appendix D provides the full text of the Acting Under Secretary's comments.

OIG Response

The Acting Under Secretary for Benefits' corrective action plan is responsive to the intent of the recommendation. We will monitor implementation of the planned action and will close the recommendation when we receive sufficient evidence demonstrating progress in addressing the identified issue.

Finding 3 VBA Needed To Strengthen Controls for Mail Processes at the Philadelphia VA Regional Office

We determined that the Philadelphia VARO mailed documentation that included personally identifiable information (PII) to incorrect addresses and that someone other than the intended veteran received the information. The Privacy Act of 1974 prohibits disclosure of records without the written consent of the individual(s) to whom the records pertain. Controls for outgoing mail processes at the Philadelphia VARO need strengthening to help reduce the risk for potential theft of veterans' PII.

**Privacy
Issue
Reported**

When a caller receives correspondence intended for another veteran, the agent instructs the caller to return the correspondence to the appropriate VBA privacy officer. During our real-time quality monitoring of incoming calls at the NPCC, a veteran's daughter called the NPCC to inform an agent that her father had received another veteran's correspondence. She expressed concern that her father's information may have been erroneously mailed to another veteran. The agent instructed her on how to return the documents and then completed the required VA Form 27-820, *Report of General Information*, to report the incident to the assistant coach. The assistant coach reported the incident to the privacy officer. Because of this incident, we decided to review the VARO's mailing procedures to determine if controls adequately protected a veteran's PII.

**VARO
Privacy
Incidents**

From January 1 through June 30, 2016, the Philadelphia VARO's privacy officer recorded a total of 83 privacy incidents. He stated that all privacy violations are reported to him through email or a report of contact. Typically, the privacy officer reviews the source document to understand how a veteran or claimant's privacy was violated. He then records the privacy incident in the Privacy and Security Event Tracking System (PSETS).

In 58 of the 83 incidents (70 percent), VBA correspondence was received by someone other than the intended recipient or veteran. Following a review and analysis of each incident, the VA's Data Breach Response Service determines whether the Philadelphia VARO Director sends a signed letter offering credit protective services to the veteran. The Philadelphia VARO reported having an outgoing mail volume of more than 1.6 million from January 1 through June 30, 2016. Although 58 incidents is not a significant percentage when compared to 1.6 million, even one privacy incident that places a veteran's PII at risk of fraud is significant. Each time a VA employee is faulted for a privacy incident, the privacy officer notifies the employee's supervisor of the violation and recommends counseling. In the 58 instances, the privacy officer identified 19 employees responsible for the reported privacy incidents. He notified the supervisors and the employees were provided training on privacy awareness, according to the PSETS and TMS records.

Here are the sources of the 58 incidents:

- Philadelphia VARO's PMC (14)
- Philadelphia VARO's Veterans Service Center (9)
- Other PMCs (3)
- VA Insurance (2)
- No origin listed (30)

For 30 of the 58 incidents (52 percent), the privacy officer was unable to identify the origin of the incidents based on available documentation. Likewise, we were unable to determine if any of these incidents originated at the NPCC, based upon data available.

*Reasons This
Occurred*

We determined that the VARO needed to strengthen controls to help ensure that documents are mailed to the intended veteran. After agents identify the documents needed to assist callers, they send them to a printer located in the NPCC. Once they have printed the documents, agents collect and insert them into a window envelope, which they place unsealed in a mail bin. Because more than one person is printing and oftentimes more than one page is being printed, a careful review should be completed to ensure agents pick up and send the proper forms. This review should occur before the VARO mailroom staff collect the mail from the bin and process it for distribution. Also, the VARO does not have a policy requiring the mailroom staff to check envelopes before sealing and mailing them to ensure the envelopes include only one veteran's PII.

Our audit did not show any oversight or monitoring by the NPCC coach or supervisors to ensure agents only placed the correct forms and documents inside the envelopes. In addition, the Philadelphia VARO Director told us that the VARO had not conducted trending analysis or assessments on the privacy incidents identified there. She said reminders of the importance of protecting PII and focusing on ensuring the correct information are sent out and discussed at weekly staff meetings and through annual privacy training in TMS. Sending a veteran's PII to someone other than the intended recipient increases the risk of identity theft.

Conclusion

The Philadelphia VARO's mailing procedures do not ensure documents are received by the intended veteran. As a result, when veterans are receiving correspondence intended for someone else, PII is put at risk.

Recommendation

6. We recommended the Philadelphia VA Regional Office Director strengthen controls at the Philadelphia VA Regional Office to help ensure correspondence that may include personally identifiable information is mailed to the intended veteran.

Management Comments

The Acting Under Secretary for Benefits concurred with our recommendation. The OFO will coordinate with the Philadelphia VARO to ensure the appropriate controls are strengthened. For example, the VARO began a centralized printing pilot on February 1, 2017. The employees in the Centralized Print Unit have been trained to identify and correct potential Privacy Act violations. Appendix D provides the full text of the Acting Under Secretary's comments.

OIG Response

The Acting Under Secretary for Benefits' corrective action plan is responsive to the intent of the recommendation. We will monitor implementation of the planned action and will close the recommendation when we receive sufficient evidence demonstrating progress in addressing the identified issue.

Appendix A Background

NPCC Performance Measures

The Director Dashboard provides VBA managers with a concise report on performance categories for each VARO with defined measures and performance targets. The NPCC has five performance measures and targets.

1. Overall Call Quality: Technical accuracy of quality measurement indicator of the correctness of information provided to callers by agents
2. Average Wait Time: Average amount of time in seconds a caller waits before call is answered
3. Agent Availability Rate: Total hours an agent is available on the phones divided by payroll hours for that period of time
4. Blocked Call Rate: Percent of incoming calls that go unanswered because all agents are unavailable
5. Client Satisfaction: Index score for caller satisfaction with call center processes

Table 4 shows rounded NPCC performance measures from the VBA Director Dashboard with national targets and average scores for FY 2016.

Table 4. NPCC Performance Measures for FY 2016

Performance Measures	National Targets	Average Scores
Overall Call Quality	87%	87%
Average Wait Time (Seconds)	500	413
Agent Availability Rate	70%	65%
Blocked Call Rate	45%	40%
Client Satisfaction (Index Score)	770	777

Source: OIG Analysis of FY 2016 VBA Director Dashboard for FY 2016 and Verizon system data

NPCC Staff

The NPCC coach is responsible for oversight of NPCC’s staff and operations. Four assistant coaches supervise the 65 legal administrative specialists or public contact representatives, also referred to as call agents or agents. The NPCC call agents have telephone contact with the public for the purpose of advising and providing information on veterans’ benefits.

Their duties include:

- Providing information regarding benefits
- Explaining documentation for veterans benefits

- Providing assistance with documents and evidence needed to submit claims
- Researching issues regarding benefits claims
- Explaining laws and regulations as they relate to veterans benefits
- Advising callers on veterans benefits and rights, processing claims-related paperwork and supporting documentation
- Explaining benefits decisions that were made regarding claims

Previous Audits

VBA established BAS in response to one of the recommendations in *Audit of National Call Centers and the Inquiry Routing and Information System* (Report No. 09-1968-150 published on May 13, 2010). This previous audit sought to determine whether the VBA call centers and the internet-based IRIS provided timely and adequate information. We concluded that VBA did not provide callers with sufficient access to call agents. The recommendations included improvement of timeliness and accuracy performance standards, as well as evaluation of staff productivity and processes, to determine the resources needed to provide timely and accurate information to veterans.

Appendix B Scope and Methodology

Scope

We conducted our audit work from August 2016 through August 2017. The audit focused on evaluating the timeliness and quality of assistance the NPCC provided to veterans and their families. To accomplish our audit objective, we reviewed NPCC-monitored calls, telephone activity reports, trainings records, and VARO privacy incidents from January 1 through June 30, 2016. In addition, we reviewed the functionality and telephone activity of NPCC's new systems, Cisco and NICE, from October 1, 2016 through May 31, 2017. We conducted site visits at the NPCC, a single-entity call center located in Philadelphia, PA.

To review VARO privacy incidents, we relied on data provided by VARO staff from the PSETS. As we did not independently extract these data and the source documents could not be produced on all of the incidents, we could not provide assurance that the data were complete for our period of review. For the purposes of our objective, we believe the conclusions and recommendations in this report are valid.

Methodology

We reviewed and analyzed applicable policies, procedures, and guidelines related to the quality and timeliness of services the NPCC provided to veterans and their families. We interviewed the OFO's Contact Operations Manager, coach, and assistant coaches to obtain information on the call center staffing, operations, and activities. We also interviewed the BAS Assistant Director and Chief of Policy and Training to determine BAS oversight of the NPCC. In addition, we interviewed the BAS Chief Quality Client Services and quality-review specialists from both BAS and the NPCC to determine the procedures and controls in place to ensure timely and quality assistance were provided to callers. We reviewed applicable call center controls to determine the adequacy of internal controls as they related to the audit objective.

We obtained and analyzed various telephone activity reports to assess whether assistance was provided timely to callers' inquiries. We validated and reconciled performance measures reported on the VBA Director Dashboard, such as blocked call rate and average wait time. We obtained staff training records from TMS and compared training required with training completed. We reviewed and analyzed privacy incidents reported to the Philadelphia VARO to determine if veterans received correspondence belonging to other veterans. We also reviewed call center and VARO mailroom procedures for preparing envelopes for mailing. Our universe of telephone calls included the monitored and evaluated telephone calls from the Verint Call Monitoring System for our audit scope period. Based on data parameters provided by the audit team, VA OIG statisticians provided a statistically valid stratified sample of NPCC and BAS monitored and evaluated telephone calls for review.

**Fraud
Assessment**

The audit team assessed the risk that fraud, violations of legal and regulatory requirements, and abuse could occur during the audit. The audit team exercised due diligence in staying alert to any fraud indicators by taking actions such as:

- Conducting fraud brainstorming sessions to identify fraud risks significant to the objective
- Soliciting the OIG's Office of Investigations for indicators
- Interviewing VBA management concerning potential fraudulent activities within the scope of our objectives
- Reviewing staff training records to determine if training was provided that pertained to external threats such as social engineering

We did not identify any instances of fraud during the audit.

Data Reliability

We relied on computer-processed data obtained from the Verint Call Monitoring System, Verizon/Genesys Telephony System, VA's Talent Management System, and NPCC-created spreadsheets. We assessed the reliability of data by reviewing for missing data in key fields, duplicate records, and data outside of our audit scope. Based on our reliability assessments, we concluded that these data were appropriate and sufficient for the purposes of our audit.

We also obtained a spreadsheet of privacy incidents created by the VARO and extracted from the agency's PSETS. We did not independently extract the privacy violation data. The source documents could not be obtained for all of the incidents; therefore, we could not verify the completeness of these data. We made appropriate adjustments to our analysis and disclosed data limitations with respect to the reported incidents. Therefore, we believe that the data are sufficient and reliable to support the conclusions and recommendations in this report.

**Government
Standards**

Our assessment of internal controls focused on those controls related to our audit objective. We conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Appendix C Statistical Sampling Methodology

To evaluate the quality of NPCC’s assistance to veterans and their families, we reviewed a statistical sample from a universe of NPCC’s evaluated and monitored calls.

Population

Our universe of calls was extracted from the Verint Call Monitoring System. Verint records all answered calls at the NPCC. BAS and NPCC quality-review specialists evaluate and score randomly selected calls to assess the agents’ performance using VBA’ Quality Management Call Quality Evaluation Guide and Scorecard. Our universe included 1,476 monitored and evaluated calls for January 1 through June 30, 2016, of which 1,176 and 300 evaluated calls were for NPCC and BAS, respectively. During the scope period, five calls per agent per month were monitored and evaluated, four by NPCC quality-review specialists and one by the supervisor, while BAS quality-review specialists monitored and evaluated 50 calls each month.

Sampling Design

We used stratified sampling of the universe of monitored and evaluated calls. VA OIG statisticians provided us with a stratified sample of evaluated calls segregated into four strata, which included NPCC and BAS evaluated calls and calls with scores above or below 92 percent. Each evaluated call is given a score based on rating criteria with a specific point value that collectively provided a final overall score. We used the overall average score for the universe of calls of about 92 percent to stratify the sample. All calls had an equal chance of being selected. We sampled 110 evaluated calls: 60 for NPCC and 50 for BAS, respectively.

Table 5 shows the number of calls by strata for the universe and sample compiled from January 1 through June 30, 2016.

Table 5. Universe and Sample of Monitored Calls

Strata	Universe	Sample
BAS Above 92%	215	27
BAS Below 92%	85	23
NPCC Above 92%	870	30
NPCC Below 92%	306	30
Total	1,476	110

Source: VA OIG analysis of evaluated calls from Verint

Results

Our sample included a wide range of scores from about 29 to 100 percent. We found that 50 of the 110 evaluated calls had a score below 87 percent. The NPCC's national target overall call quality is an average of 87 percent, which is reported on the VBA Director Dashboard. Twelve of the 50 evaluated calls (24 percent) for which agents did not provide correct information or failed to complete the required documentation were below 87 percent. Supervisors did not conduct reviews of evaluated calls with a quality score below 87 percent. Also, they did not take corrective action for those errors identified by BAS and NPCC quality-review specialists.

In the universe of quality call reviews conducted for the scope of our audit, we found 367 out of 1,476 calls (25 percent) with an evaluation score below 87 percent. Because of the various rating criteria used to evaluate calls to determine errors and scores, we were unable to estimate the number of calls for which the agent possibly failed to provide correct information or complete the required documentation.

Appendix D Management Comments

Department of Veterans Affairs Memorandum

Date: September 22, 1017

From: Under Secretary for Benefits (20)

Subj: OIG Draft Report – Audit of VBA's National Pension Call Center - VAIQ 7830548

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

1. Attached is VBA's response to the OIG Draft Report: Audit of VBA's National Pension Call Center.
2. Questions may be referred to Margaret Oberlander, Program Analyst, at 461-9271.

(Original signed by)

THOMAS J. MURPHY
Acting

Attachments

**Veterans Benefits Administration (VBA)
Comments on OIG Draft Report
Audit of VBA's National Pension Call Center**

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

Recommendation 1: We recommended the Acting Under Secretary for Benefits ensure National Pension Call Center management implements controls to require supervisors to review and take corrective actions for inaccuracies identified when evaluating calls.

VBA Response: Concur. On September 15, 2017, the Benefits Assistance Service (BAS) published an update to M27-1, IV.1.1.d (Attachment A). The update clearly defines requirements for establishing a standard operating procedure to ensure all deficiencies identified during local and BAS-conducted quality reviews are appropriately addressed and all necessary corrective actions are resolved. In addition, BAS has also added a field to the quality management evaluation form that requires all quality evaluators to identify whether follow-up or corrective action is required based upon the evaluation that was completed (Attachment B). The BAS fiscal year (FY) 2018 site visit protocol has been updated to include a requirement to assess and ensure compliance at the call centers (Attachment C). National training will be provided, to call center employees, on these updates during October 2017, with full implementation to be in place by October 31, 2017.

BAS will coordinate with the Office of Field Operations (OFO) and the Philadelphia Regional Office (RO) to ensure the appropriate controls have been implemented to meet the requirements of the established guidelines.

Target Completion Date: October 31, 2017

(Note: Attachments A, B, C were not included in the report due to their length).

Recommendation 2: We recommended the Acting Under Secretary for Benefits ensure Benefits Assistance Service has qualified staff to evaluate the quality of Spanish-speaking calls received at the National Pension Call Center.

VBA Response: Concur. BAS will announce the next open position for the Quality Client Services team with a requirement that the selected individual be bilingual and able to properly evaluate Spanish-speaking calls received at the National Pension Call Center (NPCC). While BAS does not currently have any open positions available on the Quality Client Services team, due to probable attrition, hiring for this position is anticipated during FY 2018.

Target Completion Date: September 30, 2018.

Recommendation 3: We recommended the Acting Under Secretary for Benefits ensure National Pension Call Center and Benefits Assistance Service management implement controls to help ensure staff complies with all training requirements identified in Benefits Assistance Service National Training Curriculum.

VBA Response: Concur. BAS will implement a monthly in-depth training analysis and report for each call center, to assess compliance with all established procedures, identify necessary actions, and recommend training opportunities based upon identified deficiencies. In addition, BAS will coordinate with OFO and the Philadelphia RO to correct deficiencies as they occur throughout the year. The analysis and reporting requirements will be in place within 60 days of the issuance of the FY 2018 BAS National Training Curriculum.

Target Completion Date: December 31, 2017

Recommendation 4: We recommended the Acting Under Secretary for Benefits ensure National Pension Call Center management implements controls to ensure staff completes course evaluations or assessments for instructor-led training in the Talent Management System to record training hours timely.

VBA Response: Concur. OFO will ensure the NPCC implements the appropriate controls to ensure staff is completing the necessary course evaluations and/or assessments for instructor-led training in the Talent Management System in order to record training hours timely. This information will be reviewed as part of the monthly in-depth training analysis and report that will be conducted by BAS.

Target Completion Date: December 31, 2017

Recommendation 5: We recommended the Acting Under Secretary for Benefits continuously evaluate the NPCC Cisco data and determine if a plan is needed to modify operating hours to accommodate callers, including those residing outside the Eastern Time Zone.

VBA Response: Concur. OFO will develop a plan to evaluate and review the NPCC after-hours Cisco data to determine if operating hours need to be extended or adjusted. OFO will gather and analyze the after-hours Cisco data at the end of the first quarter of FY 2018, and by the end of January 2018, present the results of this assessment along with the decision on whether the operating hours need to be extended or adjusted.

Target Completion Date: January 31, 2018

Recommendation 6: We recommended the Philadelphia VA Regional Director strengthen controls at Philadelphia VA regional office to help ensure correspondence that may include personally identifiable information is mailed to the intended veteran.

VBA Response: Concur. OFO will coordinate with the Philadelphia RO to ensure the appropriate controls are strengthened. Although not all Privacy Act violations are due to mismatched prints, the Philadelphia RO recognizes there is a need for improvement in this area. As such, the RO began a successful centralized printing pilot on February 1, 2017. Employees in the Centralized Print Unit have been trained to identify and correct potential Privacy Act violations. The RO has continued to add employees to Centralized Printing when there is capacity. In an effort to reduce these violations further, Philadelphia RO management is procuring a high-volume printer that inserts colored dividers between documents. The printer will provide additional capacity and is scheduled for delivery by March 31, 2018. The Philadelphia RO projects their remaining staff, to include the entirety of the NPCC, will be transitioned to the centralized printing construct by May 31, 2018. This will significantly strengthen the controls at the Philadelphia RO to ensure correspondence, which may contain personally identifiable information, is mailed to the intended Veteran.

Target Completion Date: May 31, 2018

For accessibility, the format of the original documents in this appendix has been modified to fit in this document.

Appendix E **OIG Contact and Staff Acknowledgments**

Contact	For more information about this report, please contact the Office of Inspector General at (202) 461-4720.
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Acknowledgments	Cherie Palmer, Director Dana Fuller Theresa Golson Jennifer Roberts Maria Stone Nelvy Viguera Butler Herman Woo Ora Young
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Appendix F Report Distribution

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