



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

*Office of Audits and Evaluations*

VETERANS BENEFITS ADMINISTRATION

Site Visit Program  
Can Do More to  
Improve Nationwide  
Claims Processing

REVIEW

REPORT #19-07062-230

AUGUST 18, 2020



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## Executive Summary

The Veterans Benefits Administration's (VBA) Compensation Service conducts oversight of the delivery of disability compensation benefits for veterans, and its quality assurance program helps ensure veterans receive the benefits they deserve. The four components of quality assurance at the time of the VA Office of Inspector General (OIG) review were the Systemic Technical Accuracy Review Program, the Quality Review Team Program, Quality Review and Consistency Program, and the Program Operations Program.<sup>1</sup>

Program Operations, also known as the site visit program, was the focus of this review. The program's mission is to provide centralized oversight and technical assistance to veterans service centers at regional offices that process disability compensation claims. Program Operations staff conduct regional office site visits to ensure veterans service center staff consistently follow VBA policies and procedures pertaining to disability compensation benefits nationwide. Program Operations analysts use a framework (protocol) to assess regional office compliance in various areas. The protocol includes reviewing the processing of specific types of disability compensation claims and the quality of standard operating procedures, such as the use of workload management plans.

The OIG did this review to determine whether the site visit program conducted site visits and identified deficiencies at regional offices, and if managers took sufficient follow-up action on frequently identified errors (error trends) to improve disability claims processing. This review is one in a series of five VA OIG reports regarding VBA's quality assurance program.

### What the Review Found

Limitations with VBA's oversight of the site visit program prevented it from driving nationwide improvements in disability claims processing. A primary mission of the site visit program is to promote collaboration with VBA's field offices and identify process improvements. Site visit analysts, who report to the Compensation Service, assessed processes at individual regional offices during their visits and identified recurring deficiencies at multiple regional offices. However, the Office of Field Operations, which is responsible for providing direction to regional offices, did not fully use the information obtained from site visit results to improve claims processing nationwide. The deputy under secretary for field operations expected regional office managers to be aware of issues raised in other regional office site visit reports, but no written policy required managers to review or address error trends.

The OIG obtained and reviewed reports of 47 regional office site visits carried out from October 1, 2015, through April 30, 2019 (the review period). The OIG found that the

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<sup>1</sup> VBA restructured the quality assurance program in June 2019, with no significant effect on this report.

Compensation Service generally identified and communicated its site visit results—including action items—to the regional office visited, the district office of jurisdiction, and the Office of Field Operations.<sup>2</sup> In addition, the Compensation Service summarized these site visit findings on its internal website, which is available for all regional office managers to review. Finally, the program’s site visit staff analyzed deficiencies and compiled a yearly summary of the error trend information. The Compensation Service shares this informal list with the Office of Field Operations. The OIG team observed that Compensation Service staff could make improvements by formalizing the error trend process—submitting an annual report to the Office of Field Operations detailing all recurring deficiencies identified throughout the inspection year from the site visit program.

In addition to correcting deficiencies at individual regional offices, site visits are intended to promote collaboration across regional offices, identify process improvements, and implement changes in coordination with other parts of VBA. The Office of Field Operations did not use site visit results to improve disability compensation claims processing nationwide because it did not have a written policy for addressing error trends. Instead, its focus was solely on correcting deficiencies at a specific regional office after a site visit was completed. For example, the site visit program identified workload management plans as a deficiency requiring immediate action and follow-up at nearly half (23) of the 47 regional offices visited during the OIG’s 43-month review period.<sup>3</sup> During interviews, regional office managers stated they had not received any guidance from the Office of Field Operations regarding actions they should take based on site visits at other regional offices. Although the site visit program annually communicates error trends to VBA managers, there is not a formal policy or procedure in place to proactively use this information to improve disability compensation claims processing nationwide.

VBA performs site visits to ensure regional offices deliver consistent claims processing nationwide. Program analysts conducted site visits, identified deficiencies, and communicated the results of the individual visits to the regional offices and the Office of Field Operations. The program analysts also compiled and shared a list of the most frequently cited deficiencies with the veterans service center managers and the Office of Field Operations. However, the Office of Field Operations did not require all offices across the country to apply the information to ensure widespread improvements. As a result, VBA missed opportunities to provide impactful oversight and drive positive change with the site visit program’s results, which could ultimately improve the accuracy and consistency of veterans’ disability benefit decisions.

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<sup>2</sup> Action items address deficiencies identified by site visit analysts and require immediate action and follow-up by the regional office. Regional office managers must address the action items, create a plan for improvement, and provide any supporting documentation.

<sup>3</sup> Workload management plans outline necessary work processes, assignments, and the movement of work through all phases of claims processing.

## What the OIG Recommended

The OIG recommended that the under secretary for benefits direct the Compensation Service to submit an annual report to the Office of Field Operations detailing all recurring deficiencies and action items identified throughout the inspection year from the site visit program. The OIG also recommended that the under secretary require the Office of Field Operations to develop and initiate a recurring action plan to correct all recurring deficiencies and action items identified by the Compensation Service throughout the inspection year from its site visit program and annual report. Finally, the under secretary was called on to direct the Office of Field Operations to establish a follow-up process to monitor compliance with the new requirement and hold regional office managers accountable for making corrections and promptly addressing action items.

## Management Comments

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



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## Introduction

Accurate and consistent decisions on disability compensation claims are vital to ensuring eligible veterans receive the benefits they deserve. The Veterans Benefits Administration's (VBA) quality assurance programs are designed to make certain that claims processing is consistently accurate. One component of VBA's quality assurance is Program Operations (the site visit program). The site visit program plays an integral role in VBA's quality assurance efforts by assessing whether policies and procedures are followed consistently nationwide.

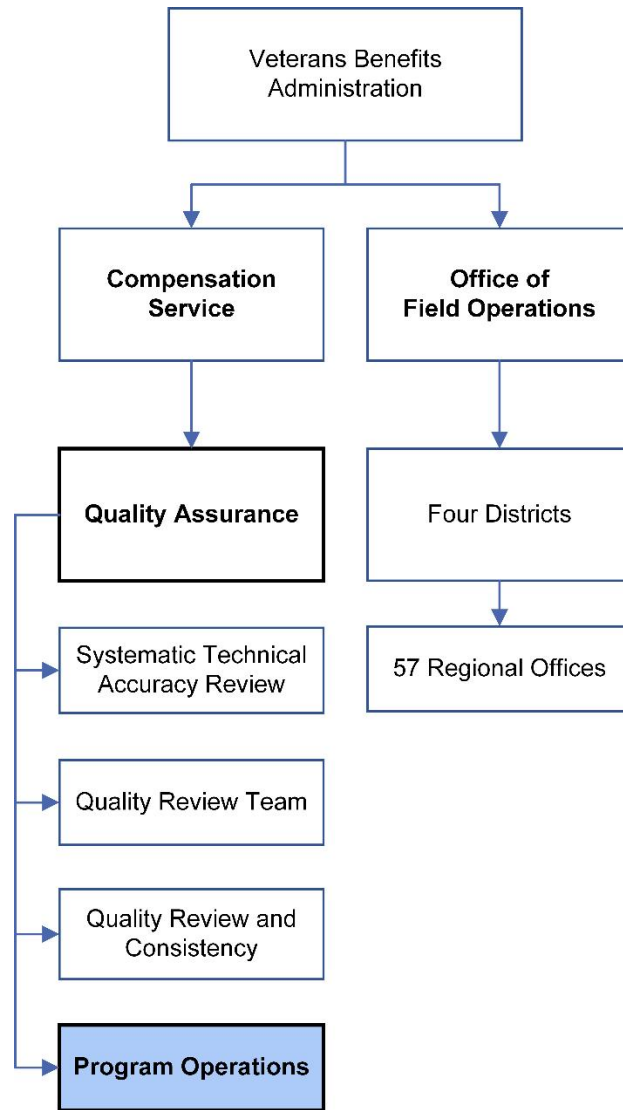
The program's mission is to provide centralized oversight and technical assistance to veterans service centers at regional offices that process disability compensation claims. In addition to ensuring consistency, site visits are intended to promote collaboration among the field offices, identify process improvements, and implement changes in coordination with other parts of VBA.<sup>4</sup> The VA Office of Inspector General (OIG) conducted this review to determine whether Program Operations (the site visit program) conducted site visits and identified deficiencies at regional offices. The review team also examined whether VBA managers took sufficient follow-up action on error trends (frequently identified errors) to improve disability compensation claims processing. This review is one in a series of five VA OIG reports regarding VBA's quality assurance program.

### Entities Related to the Site Visit Program

VBA's Compensation Service and Office of Field Operations support the site visit program in achieving its stated mission. They are responsible for the oversight, management, and delivery of disability compensation benefits. The offices are linked in VBA's organizational structure as shown in figure 1.

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<sup>4</sup> Field offices include VBA district offices, regional offices, and other offices overseen by the Office of Field Operations.



**Figure 1.** Organization of VBA offices associated with Program Operations, known as the site visit program.

Source: OIG interpretation of various VBA organization charts.

Note: VBA restructured the quality assurance program in June 2019, with no significant effect on this report.

## Compensation Service

The Compensation Service conducts oversight of the delivery of disability compensation benefits to veterans. During the OIG review period, the quality assurance program consisted of four components:

1. **Systematic Technical Accuracy Review**—VBA uses this program to measure the accuracy with which compensation claims are processed nationwide. Results from these evaluations determine the quality statistics VBA reports to the public and are used in



trend analyses to identify training needs. The reviews affect regional office quality metrics but do not affect employees' individual performance assessments.

2. **Quality Review Team Program**—Staff conduct quality reviews of regional office employees and perform error trend analyses to identify areas for training and mentoring. The purpose of the program is to enhance quality in every VBA facility that processes compensation claims. Per the Compensation Service executive director, quality results are not made available to the public.
3. **Quality Review and Consistency Program**—This program assesses regional office variance in disability ratings for the most frequently rated disabilities, conducts studies to evaluate the consistency of raters across regional offices, and provides guidance to quality review teams.
4. **Program Operations (the site visit program)**—Staff conduct site visits to review veterans service center operations, maintain the quality assurance manual, review and approve changes to controls for pending workload, and provide special assistance to regional offices and other stakeholders regarding compensation benefits.

Program Operations has seven employees: one acting chief/lead operations analyst and six operations analysts.<sup>5</sup> They are Compensation Service employees who conduct an average of 13 site visits annually and are expected to identify significant trends, problem areas, training needs, and potential best practices. Analysts are required to have specialized experience and documented knowledge of the full range of veterans' benefits, which has often been gained through work as claims processors in regional offices. Further, analysts are expected to stay abreast of current laws and regulations, work processes, policies and procedures, and electronic applications to provide optimum service.

## The Office of Field Operations

The Office of Field Operations oversees operations at VBA's district offices, VA regional offices including veterans service centers, and other field offices to ensure they deliver benefits and services effectively and efficiently. The Office of Field Operations is also responsible for

- Developing achievable performance measures that ensure timeliness, quality, and consistency of benefits; and
- Evaluating the performance of regional offices and other field offices.

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<sup>5</sup> During the review, a single individual assumed the role of both the acting chief and the lead operations analyst.

## Results and Recommendations

### **Finding: VBA Missed Opportunities to Improve Claims Processing Nationwide by Leveraging the Results of the Site Visit Program**

Limitations with VBA's oversight of the site visit program prevented it from driving nationwide improvements in disability claims processing. A primary mission of the site visit program is to promote collaboration with VBA's field offices and identify process improvements. Program analysts who report to the Compensation Service assessed specific processes at individual regional offices during their visits and identified recurring deficiencies at multiple regional offices. However, the Office of Field Operations, which is responsible for providing direction to regional offices, did not fully use the results obtained from site visits. Instead, the Office of Field Operations' focus was on correcting deficiencies at a specific regional office when a site visit was completed. Because of this focus, the Office of Field Operations did not adequately monitor common deficiencies identified at multiple regional offices and hold all office managers accountable for taking corrective action. As a result, VBA is missing the opportunity to proactively address deficiencies and achieve nationwide improvement in the consistency and accuracy of veterans' claims decisions.

### **What the OIG Did**

The OIG obtained and reviewed reports of 47 regional office site visits carried out from October 1, 2015, through April 30, 2019 (the review period). The OIG discussed the site visit review process with VBA officials and observed a site visit being conducted at the Cleveland, Ohio, regional office to better understand the process. Additionally, the team discussed the site visit program with managers and staff during OIG visits to the regional offices in Phoenix, Arizona; Denver, Colorado; and Wilmington, Delaware.

Compensation Service staff establish a protocol for each fiscal year, which is the framework used to conduct their site visits. During the OIG review period, the protocol for each fiscal year consisted of 12 to 17 areas of review. The following are examples of review areas under the site visit protocols during the review period:

- Administration of quality review teams
- Amyotrophic lateral sclerosis (ALS) claims processing
- Claims oversight involving individuals who are homeless
- Compliance with procedures for handling personally identifiable information
- Employee skills certification compliance
- Incoming mail control and processing

- Military sexual trauma claims processing
- Traumatic brain injury claims processing
- Regional office training program
- Workload management plans

The OIG's finding is based on the review team's two determinations, detailed in the narrative that follows:

1. The Compensation Service identified deficiencies during site visits and communicated results to the relevant offices.
2. Regional offices generally addressed their own deficiencies, but the Office of Field Operations did not require all offices to apply the information to achieve nationwide improvements.

### **The Compensation Service Identified Deficiencies During Site Visits and Communicated Results to the Relevant Offices**

The Compensation Service identified issues at individual regional offices as well as common deficiencies at multiple sites during the review period. This information was communicated to the Office of Field Operations and was available to managers at all regional offices.

Before visiting a regional office, site visit analysts obtain documentation from that regional office and review performance reports to assess its overall functioning. Additionally, the analysts review claims associated with areas identified in the site visit protocol to determine the types of errors staff make when processing claims. During the site visit, the analysts interview regional office managers to discuss claims-processing operations. Managers interviewed by the OIG team indicated the site visits were beneficial to regional office being reviewed.

After a site visit is completed, analysts issue a final report. The report is sent to the regional office, the district office of jurisdiction, and the Office of Field Operations. Included in the report are administrative details of the site visit, areas reviewed, and overall findings.

In addition, Compensation Service analysts summarize site visit findings on their internal website, which is available for all regional office managers to review. The website provides the following information for each site visit:

- Action items—deficiencies requiring immediate action and follow-up
- Best practices—information that would be beneficial for other regional offices to use
- Commendables—praiseworthy site-specific achievements
- Recommendations—suggestions for improvement

Finally, site visit analysts conduct trend analyses of sites' deficiencies and compile an annual summary list of the results, called "Hot Topics," which draws from responses and observations to the site visit protocol. Compensation Service staff share this informal Hot Topics list with the Compensation Service executive director. The Compensation Service also discusses the list with the deputy under secretary for field operations and the veterans service center managers at their annual conference.

Once the Compensation Service communicates deficiencies identified during site visits, the Office of Field Operations has the responsibility to use that information and follow up to make sure corrective action is taken. The Office of Field Operations has the authority to hold regional office managers accountable for correcting identified shortcomings, as well as to ensure nationwide improvements are made.

## **Regional Offices Generally Addressed Their Own Deficiencies, but the Office of Field Operations Did Not Require All Offices to Apply the Information to Achieve Nationwide Improvements**

The OIG determined that individual regional offices generally addressed local deficiencies identified by the analysts who visited them. However, the Office of Field Operations did not use the information provided by the Compensation Service to address claims-processing deficiencies nationwide.

### **Actions by Regional Offices That Were Visited**

Site visit reports contain action items when Compensation Service analysts identify deficiencies requiring regional office managers to take immediate and follow-up action. The managers must address the action items by creating a plan for improvement and providing any supporting documents in response to the final report. Per the site visit protocol, the site visit program staff review the documents to determine if the regional office has shown improvement and decide whether the action item can be closed. If not, the site visit team will continue to work with regional office managers until closure.

The final reports of the 47 site visits the OIG reviewed included 406 action items, with a range from one to 16 in each report. Of the 406 action items, 390 (96 percent) were closed, 16 (4 percent) remained open, and the average age of the open action items was approximately seven months as of January 13, 2020. Based on this information, the OIG concluded that regional office managers generally addressed deficiencies identified by the analysts who visited their sites. The OIG further concluded that the Compensation Service and the Office of Field Operations had an adequate process to ensure errors identified during site visits were addressed.

## Inaction by Other Regional Offices

In addition to correcting deficiencies at individual regional offices, site visits are intended to promote collaboration across regional offices “to identify process improvements and implement changes in coordination with” other parts of VBA.<sup>6</sup> The Compensation Service shares information about recurring deficiencies identified over multiple site visits with the Office of Field Operations as well as with regional office managers. However, during interviews, regional office managers stated they had not received any guidance from the Office of Field Operations regarding actions they should take based on site visits to other regional offices.

The OIG team focused on the following seven protocol areas to compare the site visit results over the review period:

1. Administration of quality review teams
2. ALS claims processing
3. Claims oversight for individuals who are homeless
4. Employee skills certification compliance
5. Military sexual trauma claims processing
6. Traumatic brain injury claims processing
7. Workload management plans

In these areas, the OIG found the following as the most frequently identified action items in the 47 site visit reports reviewed:

- **Workload management plans**—deficient at 23 of 47 regional offices visited (49 percent). The site visit program found that workload management plans often missed oversight and responsibility for mail workload, priority claims routing, and homeless-related claims case management.<sup>7</sup>
- **Administration of quality review teams**—deficient at 17 of 47 regional offices visited (36 percent). The site visit program found that the regional offices had no plan to clear the backlog of errors pending correction that were identified by VBA’s quality review teams.
- **Military sexual trauma claims processing**—deficient at 11 of 47 regional offices visited (23 percent). Regional office managers failed to monitor claims processors’ compliance with requirements such as conducting and properly documenting telephone

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<sup>6</sup> Compensation Service intranet, “Site Visits –Mission Statement” (not publicly available), accessed June 5, 2020.

<sup>7</sup> Workload management plans outline necessary work processes, assignments, and the movement of work through all phases of claims processing.

calls to collect additional information from claimants and including mandatory language in letters to claimants.

The OIG interviewed regional office managers and staff about the site visit program. Regional office managers said they had not been encouraged or required by the Office of Field Operations to review the site visit summaries of other regional offices, nor had they been directed to take any actions based on site visit findings from other regional offices. One veterans service center manager, when asked about workload management plans (because those are so often cited on site visit reports), said they were not the priority; claims processing and daily production numbers were. The manager also said the regional office would wait for the next site visit to get workload management plan feedback.

### **Inaction by the Office of Field Operations**

Although the site visit program annually communicates error trends to VBA managers, there is not a formal policy or procedure in place to proactively use this information to improve disability compensation claims processing nationwide. During an interview, the deputy under secretary for field operations told the OIG he expected veterans service center managers not only to look at their own regional office but also to be aware of issues raised in other regional office site visit reports. Despite the deputy under secretary's expectations, the Office of Field Operations did not direct managers to take any actions in response to the information provided by the site visit program regarding commonly identified deficiencies found at other regional offices. The deputy under secretary for field operations acknowledged there was no written policy for addressing error trends. The following are examples identified by the OIG in which the Office of Field Operations was not proactive in using site visit reports to drive nationwide change.

#### ***Example 1***

*Program analysts identified deficiencies with workload management plans during 23 of the 47 site visits conducted during the OIG review period (49 percent). Examples of deficiencies related to workload management plans included lack of oversight for overpayments and underpayments and inadequate monitoring of pre-discharge programs.<sup>8</sup> Even though this information was available, the Office of Field Operations did not direct all regional office managers to review their offices' workload management plans to determine whether improvements were needed. As a result, the OIG concluded that the Office of Field Operations missed the opportunity to proactively and more efficiently deal with the problem VA-wide. Managers at regional offices that were not visited could remain*

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<sup>8</sup> Pre-discharge programs focus on service members still on active duty. These programs include Benefits Delivery at Discharge and the Integrated Disability Evaluation System.

*unaware of common problems with workload management plans until they receive their own site visits.*

## **Example 2**

*Despite analysts compiling and sharing annual Hot Topics lists reflecting trend analyses, the Office of Field Operations did not direct regional office managers to review the lists and assess whether to take corrective action. Further, the Office of Field Operations could not point to any policies or procedures it had established that required regional office managers to review and address recurring deficiencies identified during site visits.*

Not having a formal policy that directs leaders to make broader use of information on error trends runs counter to federal guidance.<sup>9</sup> That guidance directs agencies to identify, analyze, and respond to risks to achieving their defined objectives, and to design and implement policies to mitigate risks. In addition, federal guidance requires managers to evaluate performance and hold individuals accountable for their internal control responsibilities.

Even with a formal policy to track and address systemic deficiencies, the Office of Field Operations would need to take follow-up action to hold managers accountable for results. The deputy under secretary for field operations stated that regional office managers are responsible for correcting deficiencies identified during site visits, and that district directors are responsible for understanding trends and determining whether action is required. He acknowledged that ultimately, the Office of Field Operations is responsible for ensuring regional offices and districts correct deficiencies identified during site visits.

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<sup>9</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

## Conclusion

VBA's Compensation Service has a program that performs site visits to ensure regional offices deliver accurate and consistent claims processing nationwide. Program analysts conducted site visits, identified deficiencies, and communicated the results of the individual visits to the regional offices and the Office of Field Operations. The program analysts also compiled and shared a list of the most frequently cited deficiencies with the Office of Field Operations. However, the Office of Field Operations did not require all offices across the country to apply the information to ensure widespread improvements. As a result, VBA missed opportunities to provide impactful oversight and drive positive change with the site visit program's results, which could ultimately improve the accuracy and consistency of veterans' disability benefit decisions.

## Recommendations 1–3

The OIG recommended that the under secretary for benefits

1. Direct the Compensation Service to formalize the Hot Topics list into an annual report submitted to the Office of Field Operations detailing all recurring deficiencies and action items identified throughout the inspection year from its site visit program.
2. Require the Office of Field Operations to initiate a recurring plan to correct all recurring deficiencies and action items identified by the Compensation Service throughout the inspection year from its site visit program annual report.
3. Direct the Office of Field Operations to establish a follow-up process to monitor compliance with the new requirement and hold regional office managers accountable for making corrections and addressing action items in a timely manner.

## Management Comments

To address recommendation 1, the Compensation Service will generate a report detailing all recurring site visit action items and areas of concern identified throughout the fiscal year and submit it to the Office of Field Operations. To address recommendation 2, the Office of Field Operations will develop a plan to correct all recurring deficiencies and action items identified in the Compensation Service site visit program report. To address recommendation 3, the Office of Field Operations will ensure the recurring plan includes a process to monitor and hold regional offices accountable for timely completing the corrections identified in the site visit program report.

## OIG Response

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



## Appendix A: Scope and Methodology

### Scope

The OIG team conducted its work from March 2019 through June 2020. The review covered 47 VBA Compensation Service site visits completed from October 1, 2015, through April 30, 2019.

### Methodology

To accomplish the review objective, the OIG team identified and reviewed the final reports for all 47 VBA Compensation Service site visits. To compare the site visits over the review period, the OIG team focused on administration of quality review teams, amyotrophic lateral sclerosis claims processing, employee skills certification compliance, homeless-related claims oversight, military sexual trauma claims processing, traumatic brain injury claims processing, and workload management plans.

The team also performed site visits at the regional offices in Phoenix, Arizona; Denver, Colorado; Wilmington, Delaware; and Cleveland, Ohio. The team selected the Cleveland regional office to observe a site visit in progress to gain a better understanding of the process; however, the team performed limited work at that regional office. The OIG team interviewed and obtained information and supporting documentation related to site visits from regional office managers and staff at the Denver and Wilmington regional offices. In addition, the OIG team interviewed and obtained information related to site visits from managers and staff at the Phoenix regional office.

The team discussed the findings with VBA officials and included their comments where appropriate in this report.

### Fraud Assessment

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

- Soliciting the OIG's Office of Investigations for indicators, and
- Completing the Fraud Indicators and Assessment Checklist.

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

## **Data Reliability**

The OIG team did not obtain or rely on computer-processed data. The team obtained site visit reports directly from VBA. The team did not perform detailed fieldwork to verify the information listed in the site visit reports because that was not the focus of the review's objectives. Additionally, the OIG team did not observe or participate in each of the site visits conducted from October 1, 2015, through April 30, 2019. As a result of these and other limitations, the OIG could not independently validate the Compensation Service site visit reports without a prohibitively resource-intensive review of all related underlying records, which might also be incomplete.

## **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: Management Comments

### Department of Veterans Affairs Memorandum

Date: July 28, 2020

From: Under Secretary for Benefits (20)

Subj: OIG Draft Report – Site Visit Program Can Do More to Improve Nationwide Claims Processing  
[Project No. 2019-07062-DN-0256]

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

Attached is VBA's response to the OIG Draft Report: Site Visit Program Can Do More to Improve Nationwide Claims Processing.

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

/s/

Paul R. Lawrence, Ph.D.

Attachment

**Attachment**

**Veterans Benefits Administration (VBA)**

**Comments on the OIG Draft Report:**

**Site Visit Program Can Do More to Improve Nationwide Claims Processing**

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

Recommendation 1: Direct Compensation Service to formalize the Hot Topics list into an annual report submitted to the Office of Field Operations detailing all recurring deficiencies and action items identified throughout the inspection year from its site visit program.

VBA Response: Concur. Compensation Service will generate a report and submit it to the Office of Field Operations (OFO) at the end of each fiscal year (FY) detailing all recurring action items and areas of concern identified throughout the FY from the Compensation Service site visits. Compensation Service will submit the report for FY 2020 to OFO by September 30, 2020.

Target Completion Date: September 30, 2020.

Recommendation 2: Require the Office of Field Operations to initiate a recurring plan to correct all recurring deficiencies and action items identified by Compensation Service throughout the inspection year from its site visit program annual report.

VBA Response: Concur. OFO will develop a plan to correct all recurring deficiencies and action items identified in the Compensation Service site visit program report. OFO expects to develop and implement this plan by December 31, 2020.

Target Completion Date: December 31, 2020.

Recommendation 3: Direct the Office of Field Operations to establish a follow-up process to monitor compliance with the new requirement and hold regional office managers accountable for making corrections and addressing action items in a timely manner.

VBA Response: Concur. As part of the implementation of Recommendation 2, OFO will ensure the plan will include a process for monitoring and holding regional offices accountable to complete the corrections identified in the Compensation Service site visit report, in a timely manner. OFO expects to develop and implement this plan by December 31, 2020.

Target Completion Date: December 31, 2020.

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