DEPARTMENT OF VETERANS AFFAIRS

Improved Succession Planning Would Help Address Long-Standing Workforce Problems
Why GAO Did This Study

VA operates one of the largest health care delivery systems in the nation and provides billions of dollars in benefits and services to veterans and their families. However, VA faces serious and long-standing problems with management challenges and veterans’ access to care and disability benefits. For example, as of December 2018, VA reported an overall staff vacancy rate of 11 percent at VHA medical facilities, including vacancies of more than 24,000 medical and dental positions, and around 900 human resource positions. Ensuring VA, VHA, and VBA have a pipeline of talent to fill leadership positions and mission-critical occupations is key to addressing these challenges.

The VA Choice and Quality Employment Act of 2017 includes a provision for GAO to review succession planning policies and guidance at VA and its administrations. This report addresses the extent to which succession planning policies and procedures at VA, VHA, and VBA are consistent with key leading practices.

GAO reviewed agency documents related to succession planning for leadership positions and mission-critical occupations, and interviewed agency officials. To identify key leading practices, GAO reviewed GAO’s past work and Office of Personnel Management guidance.

What GAO Recommends

GAO is making four recommendations. VA should develop a department-wide succession plan and update its succession planning directive. VHA and VBA should fully incorporate key leading practices for succession planning. VA agreed with the recommendations.

What GAO Found

The Department of Veterans Affairs (VA), the Veterans Health Administration (VHA), and the Veterans Benefits Administration (VBA) have not fully incorporated key succession planning leading practices (see table).

### Assessment of VA, VHA, and VBA Succession Planning Efforts against Key Leading Practices

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<tr>
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Legend: ● Met ● Partially Met ○ Not Met

Source: GAO analysis of VA’s, VHA’s, and VBA’s succession planning efforts.

VA lacks a current, department-wide succession plan. According to VA officials, VA has not produced a department-wide succession plan since 2009 due to leadership turnover. VA officials said the 2009 plan does not reflect their current succession planning efforts. Establishing a succession plan would help VA identify and develop high-potential staff to meet VA’s mission over the long term.

VHA’s succession plan is consistent with some leading practices, but our prior work found that VHA’s physician staffing data are incomplete. Also, VHA performs limited monitoring and evaluation of its plans. Additional monitoring and evaluation could help VHA assess the effectiveness of its strategies in achieving its goals.

VBA’s plan includes some analysis of workforce gaps for mission-critical occupations. However, VBA’s plan does not address leadership positions or fully incorporate key leading practices for mission-critical occupations, such as veterans claims examiners. Developing a succession planning process for leadership positions and fully incorporating key leading practices into its existing processes could help VBA better meet its current and future workforce needs.

VA has not updated its succession planning directive since 2003 and VA officials told us that the directive does not incorporate legal requirements put in place since then. The directive establishes requirements and responsibilities for succession planning across VA. VA officials stated that they have not updated the directive because of leadership turnover and changes in legal requirements. Updating the directive could help to ensure it reflects relevant legal requirements. In addition, we found that VA, VHA, and VBA do not follow all of the requirements outlined in the directive. Updating the directive could help to clarify and recommunicate succession planning roles and responsibilities across the department.
Abbreviations

CSEMO Corporate Senior Executive Management Office
GS General Schedule
HLTI Healthcare Leadership Talent Institute
MISSION Act VA MISSION Act of 2018
OMB Office of Budget and Management
OPM Office of Personnel Management
SES Senior Executive Service
VA Department of Veterans Affairs
VBA Veterans Benefits Administration
VHA Veterans Health Administration
VISN Veterans Integrated Service Network

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October 10, 2019

The Honorable Johnny Isakson  
Chairman  
The Honorable Jon Tester  
Ranking Member  
Committee on Veterans’ Affairs  
United States Senate

The Honorable Mark Takano  
Chairman  
The Honorable Phil Roe  
Ranking Member  
Committee on Veterans’ Affairs  
House of Representatives

The Department of Veterans Affairs (VA) operates one of the largest health care delivery systems in the nation and provides billions of dollars in benefits and services to veterans and their families. However, the department and two of its administrations, the Veterans Health Administration (VHA) and the Veterans Benefits Administration (VBA), face serious and long-standing problems with management challenges and veterans’ access to care and disability compensation benefits. In multiple reports, we have found that mission-critical skills gaps and a lack of strategic human capital management have limited VA’s ability to carry out its vital mission to serve and honor America’s veterans.

We previously reported that, as of September 30, 2017, 30 percent of the VA workforce would be eligible to retire in the next 5 years. Furthermore, as of December 2018, VA reported an overall staff vacancy rate of 11 percent at VHA medical facilities, including vacancies of more than 24,000 medical and dental positions, and around 900 human resources positions. In addition, we reported in December 2016 that VHA had limited human resources capacity and weak internal control practices, which undermined VHA’s human resources operations and its ability to

improve delivery of health care services to veterans.\textsuperscript{2} We made 12 recommendations to improve VHA’s human resources capacity and its performance management system. As of July 2019, five of those recommendations remain open.

These issues have contributed to our decision to list several areas involving VA, VHA, and VBA on our High-Risk List.\textsuperscript{3} These high-risk areas include managing acquisitions, managing risk and improving veterans’ health care, managing disability claim workloads, and updating eligibility criteria for disability benefits. In addition, we reported in May 2019 that leadership turnover impeded VA’s ability to address several of these management challenges.\textsuperscript{4} Ensuring VA, VHA, and VBA have a pipeline of talent to fill leadership positions and mission-critical occupations is key to addressing these challenges.

The VA Choice and Quality Employment Act of 2017 includes a provision for us to assess the extent to which key succession planning policies and guidance at VA and its administrations are consistent with leading practices.\textsuperscript{5} This report addresses the extent to which succession planning policies and procedures at VA, VHA, and VBA are consistent with key leading practices.\textsuperscript{6}

We focused our review on VA, VHA, and VBA because they comprise more than 99 percent of VA’s total workforce, and our past work has identified human capital deficiencies that can affect the care and services they provide.\textsuperscript{7} We excluded the National Cemetery Administration from


\textsuperscript{3}GAO, High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas, GAO-19-157SP (Washington, D.C.: Mar. 6, 2019). This list focuses attention on government operations that are most vulnerable to fraud, waste, abuse, or mismanagement, or in need of transformation.


\textsuperscript{6}In this report, we use “VA” to refer to both the department as a whole and the department-level offices within VA’s Central Office.

\textsuperscript{7}For example, see GAO, VA Management Challenges: Actions Needed to Improve Management and Oversight of VA Operations, GAO-19-422R (Washington, D.C.: Apr. 10, 2019), and GAO-19-157SP.
our review because it comprises less than 1 percent of VA’s total workforce.

We reviewed agency documents related to succession planning for leadership positions and mission-critical occupations, and interviewed agency officials about these topics. We also reviewed selected Standards for Internal Control in the Federal Government. We focused on leadership positions and mission-critical occupations because skills gaps in these areas can negatively affect VA’s ability to accomplish its mission. Our review also included VA strategic workforce planning documents, since VA officials told us they use this process for managing mission-critical occupations. In this report, we use the term “succession planning” to include both VA’s succession planning processes for leadership positions and broader strategic workforce planning efforts for mission-critical occupations.

To identify key leading practices for succession planning, we reviewed our past work on succession planning that identifies such practices and Office of Personnel Management (OPM) guidance. We also interviewed OPM officials. The key leading practices we identified for this report include:

1. **Obtain active support and participation from leadership.** Agencies’ top leadership actively participates in, regularly uses, and ensures the needed financial and staff resources for key succession planning and management initiatives.

2. **Develop succession plans aligned with strategic goals.** Agencies discuss how workforce knowledge, skills, and abilities for leadership and mission-critical occupations will contribute to the achievement of strategic and annual performance goals.

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8See appendix I for a list of leadership positions and mission-critical occupations.


3. **Analyze current and future workforce gaps.** For leadership and mission-critical occupations, agencies identify the current talent state and critical skills in the workforce, future workforce needs, and current and future workforce gaps.

4. **Identify strategies for closing workforce gaps.** Agencies identify strategies for closing workforce gaps for leadership and mission-critical occupations, such as recruitment strategies, training, and developmental opportunities.

5. **Monitor, evaluate, and update succession plans and strategies.** Agencies identify and track performance measures and progress against goals to measure the effectiveness of succession management programs, and regularly update plans to reflect lessons learned.\(^\text{11}\)

We assessed the extent to which VA’s, VHA’s, and VBA’s policies and procedures are consistent with these practices. Our review focused on succession planning at VA, VHA, and VBA at the department and administration levels, and excluded efforts at lower levels, such as at specific medical centers within VHA. We developed an overall assessment rating for each practice using the following definitions:

- **Not met.** VA, VHA, or VBA have taken few, if any, actions to meet the practice.
- **Partially met.** VA, VHA, or VBA have taken some, but not all, actions necessary to meet the practice.
- **Met.** VA, VHA, or VBA have taken actions that meet the practice. There are no significant actions that need to be taken to further address this practice.

In reviewing VA and its administrations, we reviewed their policies and procedures to determine to what extent they were consistent with leading practices. We did not assess whether VA and its administrations were effectively implementing those policies and procedures. When assigning ratings, we did not consider draft plans or other documents currently in development or under review because it is unclear whether and when leadership will approve them.

Additionally, we identified requirements related to these leading practices, including those contained in regulations established by OPM for strategic

\(^{11}\)See appendix II for additional information on the leading practices.
human capital management. For example, under the strategic human capital management regulations, agency human capital policies and procedures must align with the agency’s mission, goals, and strategic objectives, and be based on comprehensive workforce planning and analysis. Agencies are also required to monitor and address skill gaps within mission-critical occupations, and to evaluate succession plans for leadership positions to ensure leadership continuity.

We conducted this performance audit from February 2019 to October 2019 in accordance with generally accepted government auditing standards. Those 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We and others have identified challenges specific to VA’s management and oversight. These challenges have affected VA’s ability to accomplish its mission economically, efficiently, and effectively. For example, in April 2019, we summarized priority open recommendations from our previous reports to address these VA challenges. These recommendations cover areas affected by shortcomings in human capital management, such as veterans’ access to timely health care and reform of the appeals process for disability benefits. VA agreed or partially agreed with 28 of our 30 priority recommendations and is taking steps to implement them.

We have also previously reported on human capital challenges across VA. For example, we reported in March 2017 that VA determined VBA staff resources have not sufficiently kept pace with increased pending appeals, and additional staff were needed to improve timeliness and reduce its appeals inventory. We found that VA’s written workforce

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12 OPM’s Strategic Human Capital Management regulations are found in subpart B of part 250 of title 5 of the Code of Federal Regulations. These regulations define a set of systems and standards for assessing the management of human capital by agencies.

13 5 C.F.R. §§ 250.203(a) and 250.204(a).

14 5 C.F.R. § 250.204(a).

15 GAO-19-422R.

plans—which cover recruiting, hiring, and training—were not consistent with sound workforce planning practices. We recommended that VBA ensure the development of a timely, detailed workforce plan for recruiting, hiring, and training new hires. As of October 2018, VA had taken steps to address this recommendation, but still needed to address risk mitigation strategies for ensuring it has appropriate capacity to manage appeals workloads and improve timeliness of appeals decisions.

In addition, VA officials told us in August 2017 that VA had taken actions to hire more staff to update regulations on disability eligibility criteria.\(^\text{17}\) However, as of September 2018, the agency was still working to hire these staff. Furthermore, we reported in August 2018 that VHA’s Sterile Processing Services experienced workforce challenges such as lengthy hiring time frames and limited pay and professional growth potential.\(^\text{18}\) Officials told us that these challenges resulted in difficulty maintaining sufficient staffing. These challenges pose a potential risk to VA medical centers’ ability to ensure access to sterilized medical equipment. We recommended that VHA examine the services’ workforce needs and take actions based on the assessment. As of July 2019, this recommendation remained open.

In 2018, VA’s Office of Inspector General identified leadership and workforce investment as a major management challenge.\(^\text{19}\) The Inspector General noted that the root cause for many of the issues it identified at VA was poor and unstable leadership and staffing shortages. Also, a 2015 Independent Assessment found that VHA’s leadership pipeline was not robust enough to meet its current and future needs.\(^\text{20}\) The report also concluded that VHA could not identify potential leaders and prepare them to assume their future roles. It stated that inadequate succession planning and unfocused leadership development efforts contributed to these problems. Finally, the report found that VHA may have difficulties meeting

\(^{17}\text{GAO-19-157SP}.\)


\(^{20}\text{Independent Assessment of the Health Care Delivery Systems and Management Processes of the Department of Veterans Affairs, Assessment L (Leadership) (McLean, VA: The MITRE Corporation, Sept. 1, 2015).}\)
projected demand for services if it does not increase its total number of clinical employees, such as physicians, and their productivity.

Effective succession planning can help agencies ensure they have a pipeline of talent to meet current and future mission requirements, according to OPM and our past work. Succession planning is a proactive and systematic process where organizations identify the positions they consider to be too critical to be left vacant or filled by any but the best qualified persons, according to OPM guidance.\(^{21}\) Organizations then develop a plan to fill those positions with qualified and capable employees. The guidance also states that organizations should take a planned, deliberate, and holistic approach to selecting, developing, and engaging their workforce. In our prior work, we noted that effective succession planning is more than filling existing vacancies with people with the same occupational skills and competencies.\(^ {22}\) Rather, succession planning focuses on current and future needs, and develops pools of high-potential staff to meet the organization’s mission over the long term.

Our assessment found that VA’s succession planning efforts partially met one leading practice and did not meet four. VHA met two and partially met three leading practices. VBA partially met three and did not meet two leading practices (see table 1).


\(^{22}\)GAO-03-914.
Table 1: Assessment of VA, VHA, and VBA Succession Planning Efforts against Key Leading Practices, as of July 2019

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Legend: ● Met ◁ Partially Met ○ Not Met

Source: GAO analysis of VA’s, VHA’s, and VBA’s succession planning efforts.

Note: “Met” indicates that VA, VHA, or VBA have taken actions that meet the practice and there are no significant actions that need to be taken to further address this practice. “Partially met” indicates that VA, VHA, or VBA have taken some, but not all, actions necessary to meet the practice. “Not met” indicates that VA, VHA, or VBA have taken few, if any, actions to meet the practice.

VA Does Not Have an Up-to-Date Department-wide Succession Plan

VA lacks a current, department-wide succession plan. It also has not met four of the key leading practices for succession planning, but has partially met one practice. VA Directive 5002 requires that VA use the administrations’ plans to develop a workforce and succession plan annually. However, VA has not produced a leadership-approved, department-wide succession plan since 2009. VA officials said the 2009 plan does not reflect their current succession planning efforts.

Obtain active support and participation from leadership: Not met. According to VA officials, VA has tried to update its 2009 succession plan; however, leadership has not approved a revised plan because of leadership turnover. VA has developed a draft workforce plan, but as of July 2019, VA leadership had not approved the draft plan. Active leadership support for succession planning could help VA strengthen its current and future capacity to serve veterans.

Develop succession plans aligned with strategic goals: Not met. VA officials did not provide evidence that VA’s succession planning process was aligned with strategic goals. OPM strategic human capital management regulations require an agency’s human capital policies and

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23VA, Directive 5002, Workforce and Succession Planning (Washington, D.C.: Jan. 15, 2003). In this report, we refer to Directive 5002 as “VA’s succession planning directive.”
Developing an up-to-date succession plan aligned with the department’s strategic goals would help VA to establish a strategic process for meeting its current and future workforce needs.

**Analyze current and future workforce gaps: Not met.** VA officials told us that they have conducted some analyses of workforce data for mission-critical occupations, but they did not provide evidence that VA analyzes or projects workforce gaps for leadership positions or for each mission-critical occupation. For example, in accordance with the VA MISSION Act of 2018 (MISSION Act), VA reported on the steps it is taking to achieve full staffing capacity. The report included data on VA’s onboard employees, turnover rates, and growth rates for the department’s total workforce, and growth and turnover rates for clinical positions and a limited number of other positions. VA also forecasted its overall hiring requirements for the current and upcoming fiscal year based on the budget and average turnover.

However, the report, which VA produces to meet the specific requirements of the MISSION Act, does not include an analysis of workforce gaps for leadership positions or for specific mission-critical occupations. OPM’s strategic human capital management regulations require agency human capital policies and programs be based on comprehensive workforce planning and analysis, and use comprehensive data analytic methods and gap closure strategies to monitor and address skill gaps within mission-critical occupations. Further analyzing workforce gaps could help VA identify current and emerging workforce challenges and inform succession planning strategies.

**Identify strategies for closing workforce gaps: Partially met.** VA has identified some strategies for addressing workforce gaps, though not within a succession planning process. VA’s Corporate Senior Executive Management Office (CSEMO) is responsible for managing the Senior Executive Service (SES) across the department and its administrations. CSEMO coordinates the hiring, placement, training, and development of

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24 C.F.R. §§ 250.203(a) and 250.204(a)(1).


26 C.F.R. § 250.204(a)(2) and (3).
VA’s SES employees. VA also has an SES Candidate Development Program, which identifies and develops talent to fill key SES positions. Further, in its MISSION Act report, VA identifies several strategies to achieve full staffing capacity. For example, the report discusses efforts to recruit and retain clinical staff through the VHA Education Debt Reduction Program and the VA Health Professional Scholarship Program. The report also discusses the Hire Right Hire Fast model initiated in 2017 that aims to fill open positions and reduce the time to hire for the medical support assistance occupation.

VA officials have not provided evidence that they developed strategies for addressing future workforce gaps as part of the agency’s succession planning process. VA’s strategies are focused on closing current vacancies and achieving full staffing capacity. However, our prior work has found that leading organizations do more than just focus on replacing individuals; rather, they engage in broad, integrated succession planning and management efforts to strengthen both current and future organizational capacity. Additionally, OPM’s strategic human capital management regulations require agencies to plan for and manage current and future workforce needs, and to make progress towards closing any knowledge, skill, and competency gaps. Furthermore, because VA has not conducted a full analysis of its future workforce gaps, VA cannot identify strategies for closing those gaps.

Monitor, evaluate, and update succession plans and strategies: Not met. VA provided limited evidence that it monitors and evaluates workforce planning strategies. For example, VHA and VBA produce action trackers to monitor the progress of some human capital initiatives at the administration level. However, because VA officials did not provide a current succession plan with strategies for closing workforce gaps, VA’s limited monitoring and evaluation efforts are not clearly linked to a succession planning process. Monitoring and evaluating the outcomes of strategies, policies, programs, and activities is one of the key systems established in OPM’s strategic human capital management regulations, and requires agencies to identify, implement, and monitor process improvements. Monitoring and evaluating activities as part of its

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27 GAO-05-585.
28 5 C.F.R. § 250.203(b)(1) and (3).
29 5 C.F.R. § 250.203(d).
succession planning process could help VA ensure that it is implementing effective strategies. Furthermore, regularly updating its succession plans would help VA identify and address current and emerging workforce gaps.

VHA's Succession Plan Is Consistent with Some Leading Practices but VHA Performs Limited Monitoring and Evaluation of Its Plans

VHA developed a succession plan in 2016, and its efforts have met two of the five succession planning leading practices for both leadership and mission-critical occupations. However, leadership has not ensured that VHA has complete workforce data. In addition, VHA’s monitoring and evaluation of its succession plans is limited.

**Obtain active support and participation from leadership: Partially met.** VHA leadership has dedicated resources to succession planning. For example, VHA leadership dedicated staff and financial resources to develop a succession plan for VHA in 2016. VHA leadership also established the Healthcare Leadership Talent Institute (HLTI) in 2015 to strategically manage and develop VHA’s leadership talent. In addition, the former Undersecretary for Health approved the 2016 plan and encouraged staff to use the plan to develop talented staff, improve workplace culture and employee engagement, and address workforce challenges to improve the veteran experience.\(^30\)

However, VHA leadership has not ensured that VHA’s plan incorporates leading practices and departmental requirements for succession planning, primarily related to analyzing workforce gaps and monitoring and evaluating its plan. VHA officials also told us that VHA does not provide leadership succession planning guidance to Veterans Integrated Service Networks (VISN) or medical centers because VHA has started to centralize leadership succession planning at the national level.\(^31\)

Additional support and involvement from top leadership, such as providing additional oversight and guidance, could help to ensure VHA is meeting department-level succession planning requirements, and ensure that succession planning efforts achieve workforce goals.

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\(^{31}\) VHA’s VISNs are regional health care networks that manage the day-to-day functions of medical centers, including providing administrative and clinical oversight.
Develop succession plans aligned with strategic goals: Met. VHA has developed a succession plan and strategies that align with the administration’s and department’s strategic goals. The 2016 succession plan discusses VHA’s strategic direction—which includes strategic goals, major initiatives, and legislation that affect VHA’s workforce—and succession planning priorities. For example, the plan describes VHA’s strategies to adapt to a changing veteran population and to ensure it can provide sufficient, patient-driven primary and mental health care to meet the needs of veterans.

Analyze current and future workforce gaps: Partially met. VHA’s 2016 succession plan analyzes current and projected workforce trends for both leadership and mission-critical occupations. For example, the plan presents the total number of executive leadership positions and the number of vacancies in those positions. In addition, the plan includes analyses of recent historical and projected workforce trends for mission-critical occupations, including prior and anticipated onboard, retirement, quit, and total loss rates. VHA collects workforce data from facilities annually and displays these data on its internal website, which is accessible to VHA staff who make human capital and workforce planning decisions.

Although VHA tracks workforce data, our prior work has identified weaknesses with these data. For example, in October 2017, we found that VHA was unable to accurately count the total number of physicians in VA medical centers. VHA’s 2016 succession plan analyzes current and projected workforce trends for both leadership and mission-critical occupations. For example, the plan presents the total number of executive leadership positions and the number of vacancies in those positions. In addition, the plan includes analyses of recent historical and projected workforce trends for mission-critical occupations, including prior and anticipated onboard, retirement, quit, and total loss rates. VHA collects workforce data from facilities annually and displays these data on its internal website, which is accessible to VHA staff who make human capital and workforce planning decisions.

Although VHA tracks workforce data, our prior work has identified weaknesses with these data. For example, in October 2017, we found that VHA was unable to accurately count the total number of physicians in VA medical centers. Medical centers annually report data through a workforce planning tool; however, this tool does not include information on contract physicians, fee-basis physicians, and physician trainees. All of these arrangements help medical centers meet their demand for physicians, which have regularly been identified as one of VHA’s top shortage occupations. We recommended VHA develop and implement a process to accurately count all physicians providing care at each medical center. VA disagreed with this recommendation and, as of March 2019, had not implemented this recommendation. Improving the completeness and accuracy of its data would help VHA better address workforce gaps.

Identify strategies for closing workforce gaps: Met. VHA’s 2016 plan identified strategies for closing workforce gaps. For leadership positions,

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HLTI offers training programs focused on developing future healthcare leaders. In addition to managing development programs, HLTI has implemented several initiatives to address specific gaps in leadership positions and build a succession pipeline of talent. For example, HLTI facilitates an annual talent review process by identifying and developing clinical and administrative leaders at medical centers who are interested in moving up into medical center director positions, the highest position in a VA medical center.

VHA has also identified strategies to close gaps for its mission-critical occupations. For example, VHA requires facilities to develop action plans as part of the annual workforce planning cycle to reduce the risk of having critical staffing shortages. For instance, one VA medical center identified increasing human resources training and awareness of recruitment, retention, and relocation funding as an action to address shortages in dentist positions—the clinical occupation with the most severe shortage of candidates at that medical center. In addition, VHA established an initiative for hiring mental health providers, which involved hosting a virtual career event, partnering with professional organizations, and implementing other marketing and recruitment strategies.

**Monitor, evaluate, and update succession plans and strategies:** Partially met. VHA has taken some steps to monitor, evaluate, and update its succession planning. VHA updates its succession plan approximately every 4 years and issues limited updates to the plan annually. VHA’s Office of Workforce Management and Consulting tracks workforce data nationally and provides data and risk scores by occupation to VISNs and medical centers so they can monitor workforce trends. VHA also uses these data to assess to what extent facilities’ efforts are achieving workforce goals. For leadership positions, VHA officials told us that HLTI evaluates its leadership development programs and that these evaluations are used to modify the programs to better meet VHA’s succession needs.

However, VHA’s 2016 plan only included limited evaluations of previously identified strategies because VHA has not established a process for evaluating its succession planning efforts. While VHA tracks facility-level metrics for various occupations, VHA’s plan did not discuss specific methods for monitoring and evaluating its succession planning strategies. For example, VHA tracks the vacancy rates for medical center director positions; however, VHA has not identified a process to monitor and evaluate the effectiveness of the talent review process it has implemented for identifying and developing medical center director candidates.
The plan also mentioned that subject matter experts within VHA suggested expanding monitoring efforts of certain recruitment and retention programs. As noted above, agencies are required to identify, implement, and monitor process improvements under the evaluation system established in OPM’s strategic human capital management regulations. Additional monitoring and evaluation of VHA’s succession plans and strategies could help VHA to assess the effectiveness of its strategies, and to identify and address emerging workforce challenges.

VBA Analyzes Some Gaps in Its Mission-Critical Workforce, but Has Not Developed a Succession Plan for Leadership Positions

VBA has partially met three key leading practices for succession planning and has not met two practices. Its strategic workforce plan, which VBA officials said is their primary succession planning document, only incorporates some key leading practices for mission-critical occupations. The plan does not address succession planning for leadership positions.

Obtain active support and participation from leadership: Partially met. VBA’s leadership has taken some steps to promote succession planning, but has not fully incorporated departmental requirements or key leading practices. VBA officials told us that VBA’s leadership prioritizes filling vacancies for mission-critical occupations. For example, human capital staff brief VBA leadership monthly on vacancies and hiring initiatives. However, our prior work has found that leading organizations do more than simply backfill specific positions; rather, they engage in broad, integrated succession planning and management efforts to strengthen both current and future organizational capacity. As noted above, OPM’s strategic human capital management regulations require agencies to plan for and manage current and future workforce needs. In addition, VBA officials told us that VBA’s leadership reviewed and approved its strategic workforce plan. However, unlike VHA’s plan, VBA’s plan does not indicate that it was reviewed and approved by leadership.

VBA leadership also has not ensured that VBA’s plan incorporates departmental requirements or key leading practices. Some of the missing leading practices discussed below—such as aligning plans with strategic goals, identifying strategies to close workforce gaps, and monitoring and

35 C.F.R. § 250.203(d).

34 GAO-05-585.

35 C.F.R. § 250.203(b)(1).
evaluating those strategies—are also required by VA’s succession planning directive.

VBA leadership also has not ensured that VBA is performing succession planning for leadership positions, which is required by VA’s succession planning directive and recommended by leading practices. In addition, strategic human capital management regulations require agencies to ensure leadership continuity by, in part, implementing and evaluating succession plans for leadership positions.36

According to VBA officials, VBA’s strategic workforce plan does not include succession planning for leadership positions because VBA plans Senior Executive Service (SES) development in coordination with the Corporate Senior Executive Management Office (CSEMO). While CSEMO manages SES development, VBA officials told us that VBA provides input to CSEMO on VBA’s SES needs. VBA officials did not provide evidence that they are identifying current and future leadership needs. Furthermore, VBA’s leadership also includes General Schedule (GS)-13 to GS-15 managers, who are below the SES level. Planning for those managers would not involve coordination with CSEMO. Therefore, incorporating leadership succession planning into its existing workforce planning processes could help VBA strategically identify and better meet current and future leadership needs.

Develop succession plans aligned with strategic goals: Not met.
Officials stated that VBA’s strategic workforce plan is the primary document that would discuss succession planning, but this document does not discuss strategic goals and how VBA’s plans align with those goals. As noted earlier, OPM strategic human capital management regulations require agency policies and programs to align with the agency’s mission, goals, and strategic objectives.37 Aligning plans with strategic goals could help VBA better achieve current and future mission requirements. For example, VBA does not clearly describe how succession plans and strategies for its veterans claims examining occupations—a mission-critical occupation series—will address VBA’s goal to provide veterans benefits and services in a timely manner. It can also help VBA officials create a clear and convincing case for agency

365 C.F.R. § 250.204(a)(5).
375 C.F.R. §§ 250.203(a) and 250.204(a)(1).
leaders to dedicate resources—both budget and personnel—to succession planning.

**Analyze current and future workforce gaps: Partially met.** VBA’s strategic workforce plan includes some analysis of current and future workforce gaps for mission-critical occupations, but not for leadership positions. For example, according to the plan, VBA has increased the number of employees in its veterans claims examining occupations. VBA also anticipates that it will need additional claims processors to meet future demand. However, the plan does not contain similar information for leadership positions, either at the SES level or at lower levels. As noted above, agency human capital policies and programs are to be based on comprehensive workforce planning and analysis. Analyzing workforce gaps in leadership could help VBA better understand its current and future workforce requirements to meet its evolving mission requirements.

**Identify strategies for closing workforce gaps: Partially met.** VBA’s strategic workforce plan does not identify strategies or actions to close anticipated workforce gaps. VBA’s plan states that a forthcoming action plan will develop specific goals and corresponding targets, but VBA officials told us they are still developing this plan. As noted earlier, agencies are required to plan for and manage current and future workforce needs, and make progress towards closing knowledge, skill, and competency gaps. However, VBA does have training and development programs designed to ensure a pool of capable employees is available to take over leadership positions. For example, the Assistant Director Development Program helps prepare GS-14 and GS-15 employees for leadership positions within VBA. Nonetheless, identifying a coordinated set of strategies in its plan for filling leadership positions and closing mission-critical workforce gaps could help VBA address challenges in these areas.

**Monitor, evaluate, and update succession plans and strategies: Not met.** VBA updates its strategic workforce plan every 4 years and issues limited updates to the plan annually. However, VBA’s plan does not provide any information on monitoring or evaluating strategies to close workforce gaps for mission-critical occupations or leadership positions. It also does not include updates to actions or strategies based on past

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38 5 C.F.R. § 250.204(a)(2).

39 5 C.F.R. § 250.203(b)(1) and (3).
performance. Monitoring and evaluating the outcomes of strategies, policies, programs, and activities is one of the key systems established in OPM’s strategic human capital management regulations, and requires agencies to identify, implement, and monitor process improvements.40

VA’s Succession Planning Directive Has Not Been Updated Since 2003 and May Not Reflect All Relevant Legal Requirements

VA has not updated its succession planning directive since 2003 and VA officials told us that the directive does not incorporate legal requirements put in place since then. VA’s succession planning directive establishes the requirements and assigns the roles and responsibilities for succession planning across the department. VA’s directive identifies succession planning as an ongoing activity intended to best meet the needs of the department over time. According to VA officials, VA has attempted to update the directive twice since 2003, but has not completed the update due to leadership turnover. In addition, officials stated that they had to delay updating the directive to revise it to incorporate new regulatory and legislative changes that occurred during those past efforts to update the directive.

A key update to legal requirements since 2003 is OPM’s strategic human capital regulations. These regulations establish the framework agencies are to use to plan, implement, evaluate, and improve human capital policies and programs. OPM originally issued the regulations in 2008 and then revised them in December 2016.41 In addition, the VA Choice and Quality Employment Act of 2017 requires VA, among other things, to establish a single database that lists each vacant position in VA that the Secretary determines is critical to the mission of VA, difficult to fill, or both.42

Updating the directive could help to ensure it reflects legal requirements put in place since 2003, such as OPM’s strategic human capital regulations. Updating the directive is also consistent with GAO’s Standards for Internal Control in the Federal Government, which requires

405 C.F.R. § 250.203(d).


management to identify and respond to significant changes, such as new laws and regulations.\footnote{GAO-14-704G.}

In addition, we found that VA, VHA, and VBA do not follow all of the requirements outlined in the directive. For example, the directive assigns responsibility to VA, VHA, and VBA for monitoring and evaluating their succession planning strategies, which is consistent with leading practices. However, as stated above, we found that VA, VHA, and VBA do not conduct sufficient monitoring and evaluation. Updating the directive could help VA clarify and recommit succession planning roles and responsibilities across the department and its administrations.

We and others have previously identified leadership turnover and mission-critical vacancies that have affected VA’s ability to provide services to veterans. Addressing these challenges will require a planned and holistic approach to succession planning that focuses on current and future mission requirements over the long term rather than on filling existing vacancies with people with the same occupational skills and competencies.

VA, VHA, and VBA have taken important steps to develop a pipeline of talent to fill leadership positions and mission-critical occupations. For example, each has developed training and development programs for aspiring leaders. However, VA lacks a current department-wide succession plan for leadership positions and mission-critical occupations, as required by its own directive. Establishing a department-wide succession plan and improving existing workforce plans would help VA identify and develop pools of high-potential staff to meet VA’s mission over the long term. Meanwhile, VHA and VBA could each take additional steps to fully incorporate key leading practices into their succession planning.

Addressing VA’s challenges will require active leadership support and clear departmental guidance outlining VA’s and its administrations’ responsibilities for succession planning. However, VA has not updated its succession planning directive since 2003 due to leadership turnover, among other factors. Updating the directive could help ensure VA and its administrations are complying with relevant legal requirements—including
OPM’s strategic human capital management regulations—and ensure
they understand their roles and responsibilities for succession planning.

Recommendations for
Executive Action

We are making a total of four recommendations, including two to VA, one
to VHA, and one to VBA:

The Secretary of Veterans Affairs should develop a department-wide
succession plan for leadership and mission-critical occupations that
incorporates key leading practices for succession planning.
(Recommendation 1)

The Under Secretary for Health should incorporate key leading practices
into VHA’s succession planning processes, including monitoring and
evaluating VHA’s succession planning. (Recommendation 2)

The Under Secretary for Benefits should develop a succession planning
process for all leadership positions and incorporate key leading practices
into VBA’s succession planning for leadership positions and mission-
critical occupations. These practices include aligning the plans with
strategic goals, identifying strategies to close workforce gaps, and
monitoring and evaluating VBA’s succession planning. (Recommendation
3)

The Secretary of Veterans Affairs should update VA’s 2003 directive on
workforce and succession planning to incorporate relevant legal
requirements, including OPM strategic human capital management
regulation requirements. (Recommendation 4)

Agency Comments

We provided a draft of this report to the Secretary of Veterans Affairs for
review and comment. VA provided written comments, which are
reproduced in appendix III. VA concurred with all four recommendations.
VA also provided technical comments, which we incorporated as
appropriate.

We are sending copies of this report to the appropriate congressional
committees and the Secretary of Veterans Affairs. In addition, the report
is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact
me at (202) 512-2757 or goldenkoffr@gao.gov. Contact points for our
Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.

Robert Goldenkoff
Director
Strategic Issues
Table 2 summarizes leadership positions and mission-critical occupations at the Department of Veterans Affairs (VA), Veterans Health Administration (VHA), and Veterans Benefits Administration (VBA) as identified by the department and administrations.

<table>
<thead>
<tr>
<th>Department of Veterans Affairs (VA)</th>
<th>Veterans Health Administration (VHA)</th>
<th>Veterans Benefits Administration (VBA)</th>
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<tbody>
<tr>
<td><strong>Leadership positions</strong></td>
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</table>
| General Schedule (GS)-13 to Senior Executive Service (SES) leaders composing facility and program office senior leadership teams | Medical center directors and their direct reports  
Veterans Integrated Services Network directors and chief medical officers  
VHA Central Office chief officers  
Other SES and SES-equivalent positions. | SES positions  
GS-13 to GS-15 managers |
| **Mission-critical occupations**   |                                      |                                        |
| Psychology  
Human resources management  
Physicians  
Physician assistant  
Nurse  
Practical nurse  
Occupational therapist  
Physical therapist  
Clinical laboratory specialist  
Pharmacist  
Veterans claims examining  
Contracting  
Information technology management  
Cemetery caretaking | Clinical Occupations  
Registered nurse  
Medical officer (physician)  
Practical nurse  
Psychologist  
Medical technologist  
Diagnostic radiologic technologist  
Medical instrument technician  
Physician’s assistant  
Pharmacist  
Nursing assistant | Veterans claims examining  
General inspection, investigation, and compliance  
General legal and kindred admin  
Claims assistant and examining  
Legal instruments examining  
Human resources management |
| Non-Clinical Occupations  
Human resource management  
Police  
Custodial worker  
General engineering  
Medical support assistant  
Food service worker  
Medical records technician  
Medical supply aide and technician  
Human resources assistant |                                      |                                        |

Source: VA, VHA, and VBA | GAO-20-15
Appendix II: Description of Key Leading Practices for Succession Planning

We reviewed our past reports and Office of Personnel Management guidance to identify the following key leading practices for succession planning. The list below explains the importance of the practices and provides examples of how agencies can demonstrate them.

1. **Obtain active support and participation from leadership.** Agencies' top leadership actively participates in, regularly uses, and ensures the needed financial and staff resources for key succession planning and management initiatives. This leadership is important because it can provide (1) stability during plan development and implementation, (2) champions within the agency, and (3) integration with other key management planning efforts. This practice may be demonstrated by, for example, leadership participating in key succession planning meetings and ensuring succession planning policies are up-to-date.

2. **Develop succession plans aligned with strategic goals.** Agencies discuss how workforce knowledge, skills, and abilities for leadership and mission-critical occupations will contribute to the achievement of strategic and annual performance goals. This alignment helps ensure agencies’ plans provide the talent needed to meet their current and future mission requirements. This practice may be demonstrated by, for example, integrating succession planning into strategic planning and annual strategic objectives review assessments.¹

3. **Analyze current and future workforce gaps.** For leadership and mission-critical occupations, agencies identify the current talent state and critical skills in the workforce, future workforce needs, and current and future workforce gaps. This gap analysis is important for identifying the skills and competencies needed for achieving its missions and goals even as the agency’s operating environment changes. This practice may be demonstrated by, for example, conducting and documenting current and projected workforce analysis, including workforce gaps.

¹Since 2014, Office of Management and Budget (OMB) guidance has directed agencies to annually assess their progress in achieving the strategic objectives established in their strategic plans. A strategic objective is a type of goal that reflects the outcome or impact the agency is seeking to achieve. OMB’s guidance directs agencies to use the results from these strategic reviews to inform various decision-making processes. Among other things, the guidance states that the reviews should identify where additional skills or capacity are needed to address existing gaps that are impeding progress on goals. OMB, *Preparation, Submission and Execution of the Budget*, Circular No. A-11, pt. 6, §§ 200.2 and 260.9 (June 2019).
4. **Identify strategies for closing workforce gaps.** Agencies identify strategies for closing workforce gaps for leadership and mission-critical occupations, such as recruitment strategies, training, and developmental opportunities. This planning is important for aligning strategies to eliminate gaps, and tailoring workforce programs and processes to the agency’s needs. This practice may be demonstrated by, for example, developing and implementing action plans and training and development programs.

5. **Monitor, evaluate, and update succession plans and strategies.** Agencies identify and track performance measures and progress against goals to measure the effectiveness of succession management programs, and regularly update plans to reflect lessons learned. This performance monitoring is important for measuring both the outcomes of strategies and how the outcomes have helped accomplish the agencies’ missions and goals. This practice may be demonstrated by, for example, conducting progress assessments or revising programs based on past performance.
THE SECRETARY OF VETERANS AFFAIRS
WASHINGTON

SEP 12 2019

Mr. Robert Goldenkoff
Director
Strategic issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Goldenkoff:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: DEPARTMENT OF VETERANS AFFAIRS: Improved Succession Planning Would Help Address Longstanding Workforce Problems (GAO-20-15).

The enclosure provides technical comments and sets forth the actions to be taken to address the draft report recommendations.

VA appreciates the opportunity to comment on your draft report.

Sincerely,

[Signature]

Robert L. Wilkie

Enclosure
Appendix III: Comments from the Department of Veterans Affairs

Enclosure

Department of Veterans Affairs (VA) Comments to Government Accountability Office (GAO) Draft Report

DEPARTMENT OF VETERANS AFFAIRS: Improved Succession Planning Would Help Address Longstanding Workforce Problems (GAO-20-15)

Recommendation 1: The Secretary of Veterans Affairs should develop a department-wide succession plan for leadership and mission-critical occupations that incorporates key leading practices for succession planning. This plan could also be incorporated into VA’s existing strategic workforce planning processes.

VA Comment: Concur. Efforts have begun to update the Department of Veterans Affairs (VA) policy on workforce and succession planning (e.g., VA Directive 5002). VA Handbook 5002 will also be developed to provide department-wide guidance on succession planning requirements for leadership and mission-critical occupations (MCO). The Handbook will incorporate leading practices for succession planning. Target Completion Date: September 30, 2020.

Recommendation 2: The Under Secretary for Health should incorporate key leading practices into VHA’s succession planning processes, including monitoring and evaluating VHA’s succession planning.

VA Comment: Concur. Efforts have begun to incorporate key leading practices into the Veterans Health Administration’s (VHA) succession planning processes. VHA’s Workforce Management and Consulting Office will monitor and evaluate VHA’s succession plan by:

(a) developing succession planning guidance and metrics;
(b) developing a follow-up process to assess field-based succession planning actions; and
(c) incorporating metrics and evaluation/updates of implementation strategies into the bi-annual VHA Workforce Succession Plan.

Target Completion Date: December 2021.

Recommendation 3: The Under Secretary for Benefits should develop a succession planning process for all leadership positions and incorporate key leading practices into VBA’s succession planning for leadership positions and mission-critical occupations. These practices include aligning the plans with strategic goals, identifying strategies to close workforce gaps, and monitoring and evaluating VBA’s succession planning.

VA Comment: Concur. The Veterans Benefit Administration (VBA) will develop a succession plan for leadership positions and MCOs that aligns with the strategic goals of the organization. VBA’s Office of Human Capital Management (OHCM) has a two-part strategy to eliminate the deficiencies the Government Accountability Office (GAO) identified.
Department of Veterans Affairs (VA) Comments to Government Accountability Office (GAO) Draft Report

DEPARTMENT OF VETERANS AFFAIRS: Improved Succession Planning Would Help Address Longstanding Workforce Problems

(GAO-20-15)

- The Fiscal Year (FY) 2020 Strategic Workforce Plan (SWP) refresh is currently under development. This document focuses on the MCOs and will clearly state its link to the strategic goals and include strategies for mitigating attrition. It will also provide detailed recruitment and retention strategies for these positions. VBA’s FY 2020 SWP refresh is expected to be completed by October 31, 2019.

- The VBA Succession Plan will identify the GS-13 through GS-15 leadership populations within the MCOs. Also, VBA will continue to work with VA’s Corporate Senior Executive Management Office regarding the Senior Executive Service populations, as they are managed by that office. VBA’s Succession Plan will identify the life cycle of the plan and the stakeholders involved. The Plan will also identify the steps needed to ensure a talent pool of employees is consistently available to maintain continuity of institutional knowledge. This document will align the human capital management practices for these populations with the relevant organizational strategic objectives. VBA’s Succession Plan is expected to be completed by May 1, 2020.

VBA’s SWP will maintain the big picture view by focusing on the overall workforce of the MCOs. VBA’s Succession Plan will focus on the leadership populations within the MCOs. These documents will meet the five leading practices GAO recommends by ensuring the plans are aligned to strategic goals, analysis is conducted on both current and future gaps, and strategies are identified for mitigating the identified gaps. Annually, VBA’s CHCM will review, assess, and update both documents and submit them to the Under Secretary for Benefits for approval. Target Completion Date: May 1, 2020.

Recommendation 4: The Secretary of Veterans Affairs should update VA’s 2003 directive on workforce and succession planning to incorporate relevant legal requirements, including OPM strategic human capital management regulation requirements.

VA Comment: Concur. VA Directive 5002, Workforce and Succession Planning, is being updated to incorporate relevant legal requirements, including the U.S. Office of Personnel Management’s strategic human capital management regulation requirements. Target Completion Date: December 31, 2019.
Appendix IV: GAO Contact and Staff Acknowledgments

<table>
<thead>
<tr>
<th>GAO Contact</th>
<th>Robert Goldenkoff, (202) 512-2757 or <a href="mailto:goldenkoffr@gao.gov">goldenkoffr@gao.gov</a>.</th>
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<tbody>
<tr>
<td>Staff Acknowledgments</td>
<td>In addition to the contact named above, Shannon Finnegan (Assistant Director), Alexander Ray (Analyst-in-Charge), Colleen Corcoran, Karin Fangman, Robert Gebhart, and Sarah Green made key contributions to this report. Steven Flint, Shelby Kain, Christy Ley, Marcia Mann, Rachel Stoiko, and James Whitcomb also made contributions.</td>
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</tbody>
</table>
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