

THE VETERANS BENEFITS ADMINISTRATION



# VBA BENEFITS EQUITY ASSURANCE PLAN

Submitted by:

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## Letter from the Under Secretary for Benefits

Today, the benefits and services delivered by the more than 32,000 talented and hardworking Veterans Benefits Administration (VBA) employees—over half of whom are Veterans, themselves—not only help fulfill the promise of a grateful nation, but also empower Veterans to be homeowners, to pursue further education and training, and to live healthier and more prosperous lives ... to help them thrive, not just survive. But, throughout our history, we have not always delivered equitable outcomes for all Veterans.

To help us serve all Veterans as well as they have served us, we are standing up the new VBA Office of Equity Assurance, which will have responsibility for executing a comprehensive Equity Assurance Plan. This new office and plan will examine every aspect of VBA, including organizational structure, customer experience, training and quality control, data, outreach, policies, and broader structural inequities to identify any disparities that may exist, understand their root causes, and eliminate them. Feedback from Veterans, families, caregivers, and survivors we serve will enable us to better understand their pain points and create effective solutions designed with the Veteran at the center.

This new plan and report are key elements of VA's efforts to implement President Biden's Executive Order (EO) [13985](#) on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, and EO [14091](#), which charged the Federal Government with advancing equity for all, including communities that have long been underserved, and addressing systemic racism in policies and programs.

Collaboration and transparency will be of the utmost importance as we engage with VA's Agency Equity Team, also known as the Inclusion, Diversity, Equity and Access (I\*DEA) Council, VA's Chief Diversity Officer, the Center for Minority Veterans, the Center for Women Veterans, other agencies across the Federal Government, community partners, Congressional leaders, Veterans and Military Service Organizations, and other internal and external stakeholders at every stage.

We recognize that eliminating inequities of the past will not happen overnight, but we are fully dedicated to carrying it out with promptness and precision. We will share our progress and our findings every step of the way. Our commitment to Veterans and their families, caregivers, and survivors is firm: we will not rest until every Veteran gets the world-class benefits and care they have earned.



**JOSH JACOBS**  
*Under Secretary for Benefits*

# VBA Equity Assurance Plan

## 1. ORGANIZATIONAL STRUCTURE:

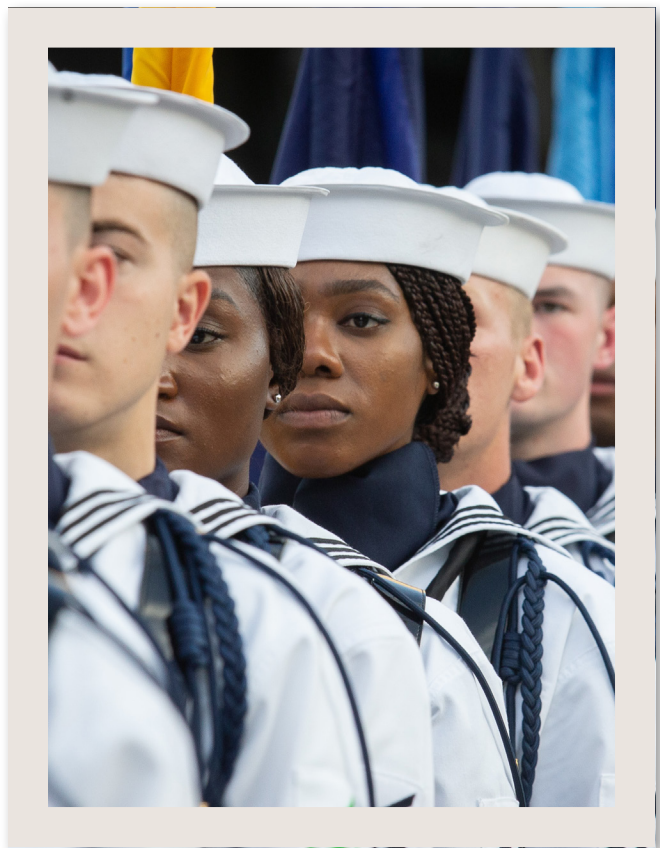
VBA will ensure proper focus, oversight and accountability related to matters of equity within its administration. This includes reviewing the foundation of its benefits delivery processes and its hiring and workforce development practices.

- a. VBA has created a new Office of Equity Assurance led by a career senior executive to assess any disparities that may be present within benefits programs. The office will review all aspects of the benefits programs and data and will initiate internal and independent studies to examine notable gaps or variances in benefits decisions for underserved Veterans and create recommendations.
- b. VBA will increase recruiting at minority-serving institutions at VBA – such as Historically Black Colleges and Universities, Tribal Colleges and Universities, Hispanic Serving Institutions, and other Minority Serving Institutions, as well as other organizations such as the National Naval Officers Association and the National Association of Minority Veterans of America.

## 2. CUSTOMER EXPERIENCE

VBA will work with the Veterans Experience Office (VEO) to identify pain points, moments that matter and opportunities to increase access to and improve use of benefits, education, and outcomes for underserved Veterans. Understanding Veterans' experiences at various stages in the processes for each of our benefit programs will enable us to address the needs of Veterans and to better understand how, why and where disparities may develop. The areas we will examine include, but are not limited to, the following: VBA applications and intake processes, the evidence-gathering process, disability exams, call centers and interactions with our Public Contact Centers, VSOs, accredited attorney representatives and other relevant stakeholders. VBA will then use that new understanding to make policy and process changes that will mitigate any inequities. This will be achieved by:

- a. Building Veteran personas and creating journey maps for benefit program offices to better understand and develop solutions for the unique issues facing each Veteran group so that VBA can improve services and meet these Veterans' needs; and



- b. Leveraging behavioral and social science to drive increased access to benefits and establish listening sessions and focus groups to facilitate improved Veterans satisfaction and trust.

### 3. TRAINING AND QUALITY CONTROL

VBA believes training on matters of diversity, inclusion and equity is foundational to fostering organizational culture and ensuring employees have the tools they need to serve Veterans in manners that promote equity. Additionally, VBA will assess the quality of decision-making throughout the claims process in order to ensure objectivity and consistency in claims adjudication.

- a. VBA will strengthen its training curriculum in all benefit programs to ensure awareness and accountability in educating our workforce, to include anyone that engages directly with Veterans, their families, caregivers, and survivors and cultivating equitable culture and practices.
  - i. VBA will continue to champion uniform training and curricula related to inclusion, diversity, equity, and access (I\*DEA) to ensure consistent messaging and instruction to its workforce in the respective benefit programs and services.
  - ii. VBA will mandate unconscious bias and implicit bias training for all VBA Employees and Compensation and Pension examiners (both vendor and Veterans Health Administration (VHA) clinicians).
  - iii. VBA will ensure that communication and education related to the Agency's stance on equity is provided to its partnering organizations—VSOs, attorney representatives, partnering education institutions and partnering mortgage affiliates.
- b. VBA will incorporate measures for monitoring and ensuring consistency of disability claims' development and decision actions. VBA's Compensation Service will explore its quality control process for means to improve surveillance claims for any markers of bias or inequity. VBA will use the results from these quality reports and consistency reviews to develop individual and national training, as well as to improve policies and information technology systems in order to ensure objective decisions for benefits claims.



- c. VBA will also leverage artificial intelligence and automation to pinpoint areas of training and corrective action, as well as to maintain an iterative quality control process at the Regional Office (RO), District and national level, ensuring that we have continuous feedback through the system to inform on training and process improvements and potentially inform on standards, policy, and behavior.
- d. VBA Education and Loan Guaranty Services will also work with their respective partnering entities to ensure they consider standards of equity and fairness for current and future students and homeowners.

#### 4. DATA COLLECTION, CURATING, AUTOMATION AND ANALYSIS

VBA will leverage claims data, along with related demographic data, to ensure objective analysis and study of issues related to benefits equity.

- a. VBA will participate in the VA Data Governance Council’s Demographic Data Working Group to develop recommendations for an enterprise standard collection of demographic data and will develop a plan to implement these to improve its processes, including closing gaps via additional data collection.
- b. VBA will assess its current mechanisms for collecting pertinent Veteran or claimant information and will conduct further analysis to ensure that any new requirements for obtaining additional demographic data related to equity are proper and necessary. In order to fully support equity assurance, VBA may need to expand its data collection to be consistent with Data Governance and Analytics’ guidelines and ensure high quality, compliant data are available. Where such information is already obtainable and available within an approved VA information system, VBA will leverage that key demographic data (in line with the enterprise standards for demographic data collection) to enable VBA to serve Veteran applicants and beneficiaries equitably. In this way, VBA will not duplicate information collection through new customer forms or systems of record and will adhere to Federal requirements to reduce or eliminate respondents’ burden to provide such information.
- c. VBA will leverage data analytics subject matter experts to assess benefits data and identify key insights and tangible actions.

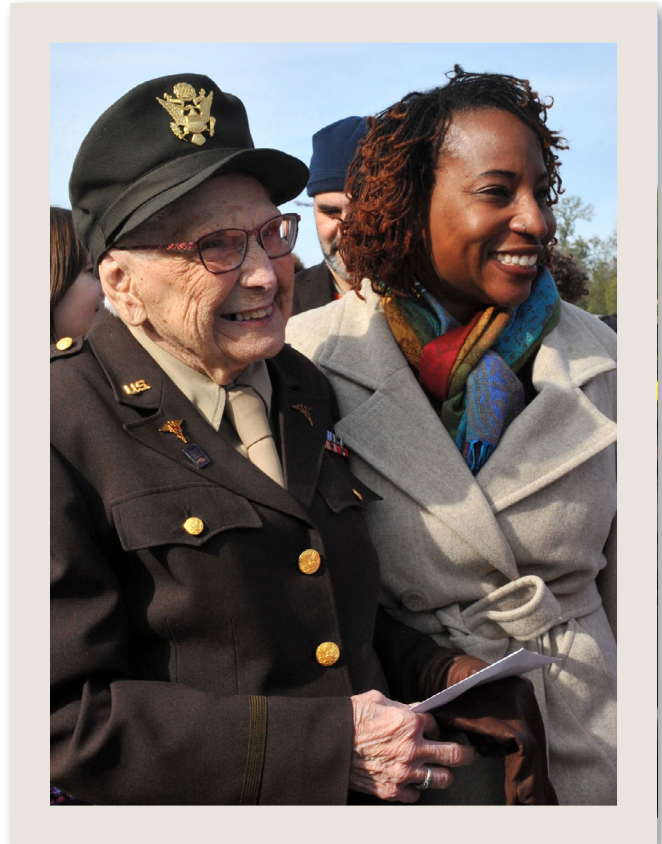


- d. VBA will create, maintain, and utilize an internal VBA Equity Dashboard to better assess and address benefits inequities.
- e. As part of the new VBA Office of Equity Assurance, VBA will perform extensive studies and analysis across all VBA business lines to assess program and benefits data in order to identify any root causes that may indicate gaps or disparities in the provision of benefits. These will include the nature, scope, and scale of any solutions to eradicate any identified inequities.
- f. VBA will leverage artificial intelligence, machine learning and graph analytics to streamline the detection and monitoring of claim disparities and operational decision-making.

## 5. OUTREACH

VBA will promote education and awareness about its benefit programs to ensure that all Veterans have information and access to the benefits they have earned and deserve. In those underrepresented populations, VBA will create additional opportunities to engage and support them.

- a. VBA will strengthen its coordination of outreach efforts for underrepresented groups across all VBA business lines through VBA's Office of Outreach, Transition and Economic Development and VBA's ROs, in partnership with the CMV, CWV, Chief Diversity Officer, VHA, VEO and the Office of Public and Intergovernmental Affairs. This focused effort will aim to increase and improve outreach and claims support to underserved Veteran populations.
  - i. VBA will hold Listening Sessions specific to those in the underrepresented groups.
  - ii. VBA will create unique outreach engagements such as town halls, benefit fairs and social media interactions for underrepresented groups at which they can receive information/education, file claims and receive other assistance.
- b. Consistent with the coordinated outreach program, VBA will improve its outreach materials and resources while requiring all VBA ROs to perform meaningful outreach to underserved Veteran populations.



## 6. POLICIES

VBA recognizes many opportunities to improve upon outdated practices and processes within the benefit programs. Therefore, policy improvement will be a primary focus for ensuring all Veterans receive the benefits they have earned and deserve.

- a. VBA will continue to pursue updates to VA’s “character of discharge” regulations to address potential sources of inequity since minority Veterans have been disproportionately impacted, leaving them more likely to be historically underserved.
- b. VBA will explore other policy and systems changes to expand access to benefits and eliminate barriers to equitable benefits outcomes where there are indicators of gaps in services.
- c. VBA will identify and promulgate policies based on new approaches, lessons learned and best practices from research and data, as identified through this plan, as well as from within VA and outside, from other Federal agencies and private sector organizations.

## 7. ADDRESSING HISTORICAL STRUCTURAL INEQUITIES

Recognizing the challenges that VBA will face when correcting systemic issues that have led to modern-day inequities, VBA will examine these influences in order to modernize and improve its benefits programs.

VBA’s Office of Equity Assurance will engage in internal and external studies and assessments of historic structural inequities to help identify and quantify the impact of historical disparities in benefits across all VBA business lines and create recommendations.

Where possible, VBA will take program and policy action to provide opportunities for redress by proposing legislative change through policy/program change or outreach and engagement.

