

VETS Response to Draft Report

U.S. Department of Labor

Assistant Secretary for
Veterans' Employment and Training
Washington, D.C. 20210



OCT 22 2013

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MEMORANDUM TO: ELLIOT P. LEWIS
Assistant Inspector General for Audit

FROM: KEITH KELLY 

SUBJECT: VETS Oversight of Florida JVSG Program Report No.
06-13-001-02-001

Thank you for the opportunity to comment on the draft report, "*Veterans' Employment and Training Service (VETS) Oversight of Florida's Jobs for Veterans State Grant (JVSG) Program Needs to Be Strengthened*" (06-13-001-02-001). Your recommendations in the report (**in bold**) are as follows:

- **Develop new JVSG guidance to ensure DVOP specialists provide and document intensive services for eligible veterans who have significant barriers to employment by requiring DVOP specialists to identify and document the veterans' barriers, and use the case management approach when providing intensive services.**

VETS concurs with this recommendation. Disabled Veterans' Outreach Program (DVOP) specialists should provide and document intensive services to veterans with significant barriers to employment. Although all barriers to employment are not easily recognized or previously documented in a record, an in-depth assessment should be made early in the evaluation process. The barrier to employment that is being addressed through intensive services should also be documented and the case record updated if more barriers manifest during case management. Since the period covered by the audit, steps have been taken consistent with this recommendation. Guidance is being developed for implementation in FY 2014 and training on assessing veterans' needs and documenting intensive service activities is currently conducted at the National Veterans' Training Institute.

- **Develop new JVSG monitoring procedures for reviewing intensive services documentation maintained by DVOP specialists. During on-site reviews, ensure DVETs review case notes and supporting intensive services documentation.**

VETS concurs with this recommendation and the need for an effective monitoring protocol that allows the agency to assess the delivery of intensive services. During FY 2013, VETS published Director's Memorandum 03-13 (attached), which provides guidance outlining the audit process

to be carried out at the state and local levels to determine a state's adherence to the statutory roles and responsibilities of JVSG staff. Section 241 of the VOW to Hire Heroes Act of 2011 requires VETS to perform these audits. The audit guidance instructs the VETS staff person to review an appropriate sampling of case files of veterans who were provided case management as part of the provision of intensive services within the last four completed calendar quarters. The guidance also instructs VETS staff to ensure DVOP specialists are documenting services provided, and if that documentation reflects appropriately in the State Workforce Agency's Management Information System.

- **Develop new JVSG procedures that verify state JVSG performance data.**

VETS concurs that JVSG performance data should be verified for accuracy. In FY 2014, VETS anticipates the release of joint guidance with ETA, which clarifies the roles and responsibilities of JVSG staff, and proper referral of participants to the JVSG program. Specifically, this guidance will provide a definition of significant barriers to employment and emphasize the importance of providing increasing rates of intensive services to participants with these barriers.

Upon release of that guidance, and as a part of regular monitoring and oversight VETS will instruct its staff to ensure that states:

1. Have provided appropriate guidance to DVOP specialists regarding their responsibilities in providing intensive services to program participants;
2. Have properly coded service levels in their management information system to capture the types of services provided to program participants; and
3. Have properly documented the provision of services to participants in individual participant files.

If there are questions regarding this memorandum please address them to the VETS point of contact, Gordon Burke, at (202) 693-4707.

Attachment: Director's Memorandum 03-13, issued 06/21/2013 (with 2 attachments)