



December 2019

VA VOCATIONAL REHABILITATION AND EMPLOYMENT

Additional Assessment Could Enhance Consistency among Counselors

GAO Highlights

Highlights of [GAO-20-28](#), a report to congressional requesters

Why GAO Did This Study

VA's VR&E program helps veterans with service-connected disabilities obtain and maintain suitable employment. VR&E participants work with vocational counselors to develop career goals and employment plans. However, some veteran service organizations have questioned the consistency with which participants are treated by counselors in developing these plans. GAO was asked to review how VR&E vocational counselors work with participants to select employment plans, and VA's efforts to ensure high quality and consistency.

This report examines (1) the factors that vocational counselors considered when developing VR&E participants' plans and how consistently they applied those factors, and (2) the extent to which VA trains and monitors vocational counselors to ensure a consistent, high-quality approach to helping veterans develop plans. GAO analyzed VR&E quality review data from fiscal years 2016 through 2018; reviewed a random, non-generalizable sample of 34 VR&E case files from 2019; reviewed relevant federal laws, regulations, and VA policy; and interviewed VR&E counselors and other program officials.

What GAO Recommends

GAO recommends that VA assess the consistency of VR&E plans among counselors by, for example, comparing counselors' responses to identical hypothetical cases, and take mitigating steps if warranted. VA concurred with the recommendation and planned to develop a consistency study.

View [GAO-20-28](#). For more information, contact Elizabeth Curda at (202) 512-7215 or curdae@gao.gov.

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Additional Assessment Could Enhance Consistency among Counselors

What GAO Found

The Department of Veterans Affairs' (VA) Vocational Rehabilitation and Employment (VR&E) counselors in GAO's review generally considered a set of common factors when developing plans to help veterans with disabilities obtain employment, but counselors explained that inconsistent application of those factors likely occurs. These factors included the veteran's disability, his or her interests, and local labor market conditions. The 34 VR&E plans GAO reviewed showed that counselors' generally considered and documented these factors (see table). Counselors in each of the three regional offices GAO visited said that plans are individualized to suit the veteran's needs and as a result will differ because each veteran's case is unique. Nonetheless, these counselors acknowledged that some veterans with similar circumstances likely receive different types of plans given differences in counselor judgment and experience.

Common Factors VR&E Counselors Considered When Developing Veterans' Plans and Number of Case Files GAO Reviewed in Which the Factor Was Documented

Factor	Number of case files (out of 34)
Functional limitation from disability	34
Job/career interests	34
Vocational aptitude test results	34
Prior education	34
Prior work or military experience	34
Local labor market information	32

Source: GAO analysis of Vocational Rehabilitation & Employment (VR&E) case files. | GAO-20-28

Note: The table is not intended to provide a complete list of all factors that counselors took into consideration during plan development. It represents factors that were documented in all, or nearly all, case files we reviewed.

VA trains and monitors counselors to develop complete VR&E plans but does not assess the consistency of plans across counselors for veterans with similar circumstances. VA's training for VR&E counselors emphasizes that plans should accommodate each veteran's individual needs, abilities, aptitudes, and interests. In designing training for counselors, VA followed principles identified by GAO for strategically developing training. VA monitors the completeness of VR&E plans through national and regional quality reviews that check, among other elements, whether plans have an employment focus and include needed services. However, these quality reviews do not assess the consistency of plans developed by different counselors. VR&E officials explained that the agency has not yet conducted such an analysis because of other priorities, but agreed that it could do so. One of the objectives of VR&E's central office is to provide training and guidance to help ensure consistency among field staff. Assessing consistency across counselors would better position VA to mitigate any unfair differences in plans for similarly-situated veterans.

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Abbreviations

CRCC	Commission on Rehabilitation Counselor Certification
VA	Department of Veterans Affairs
VBA	Veterans Benefits Administration
VRC	vocational rehabilitation counselor
VR&E	Vocational Rehabilitation & Employment

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December 10, 2019

The Honorable Jon Tester
Ranking Member
Committee on Veterans' Affairs
United States Senate

The Honorable Mark Takano
Chairman
Committee on Veterans' Affairs
House of Representatives

About 4.7 million veterans—including more than 1.7 million from the Iraq and Afghanistan era—have a disability connected to their military service,¹ and many of these veterans face special challenges obtaining employment because of these physical or mental health conditions. The Department of Veterans Affairs (VA) operates the Vocational Rehabilitation and Employment (VR&E) program, which is intended to help veterans with service-connected disabilities obtain and maintain suitable employment, among other goals. The VR&E program provides services including vocational assessment, education and training, and job placement. In fiscal year 2018, VR&E received funding of about \$1.6 billion to cover program expenses, including tuition and subsistence payments for participants. In the same year, over 900 VA vocational counselors worked directly with the program's approximately 125,000 participants to help develop individualized employment plans, which entail identifying appropriate career goals and managing progress toward achieving them.²

Testimony from several veteran service organizations at congressional hearings has raised questions about the consistency with which

¹ These data come from a survey of veterans conducted in August 2018 by the U.S. Census Bureau.

² VA refers to the program's vocational counselors as vocational rehabilitation counselors (VRC). In this report, we refer to them as VR&E counselors or counselors. We refer to the plans that counselors develop for VR&E participants as employment plans or plans.

counselors develop plans for veterans with similar circumstances.³ You asked us to examine how counselors work with VR&E participants to develop plans and VA's efforts to ensure quality and consistency. This report examines (1) the factors vocational counselors considered when developing VR&E participants' plans and how consistently counselors applied these factors, and (2) VA's training and monitoring of counselors to ensure a consistent, high-quality approach to helping veterans develop plans.

To identify factors that vocational counselors considered when developing VR&E plans, we reviewed program guidance and interviewed VR&E officials about the plan development process. To gain further insight, we reviewed and analyzed a random, non-generalizable sample of veterans' VR&E case files. Specifically, we reviewed all 34 case files randomly selected by VA for its February 2019 quality review of VR&E plan development. We assessed VA's selection methodology by reviewing documentation and interviewing knowledgeable officials and found it to be reliable for our purposes. VR&E's quality reviews cover all phases of counselors' casework, whereas our review focused on plan development. VR&E's quality reviews assess whether counselors conducted a complete evaluation to determine the veteran's needs and circumstances. In contrast, our review focused on identifying specific factors that counselors considered to generate veterans' plans, identifying how consistently they applied them, and describing examples related to plan development and any changes that occurred in the development.

To identify how VA monitors and trains counselors, we visited VR&E's centralized quality review office, reviewed training materials and program guidance for counselors, and interviewed program officials. We evaluated VA's practices against its program objectives and a guide we developed for assessing training and development efforts.⁴ To inform both objectives, we: analyzed VR&E quality review data from fiscal years 2016 through 2018; reviewed relevant federal laws, regulations, and VA policy;

³ *A Review of VA's Vocational Rehabilitation and Employment Program before the Subcommittee on Economic Opportunity of the Committee on Veterans' Affairs, U.S. House of Representatives, 115th Cong. (May 17, 2018) and Evaluating the Effectiveness of VA Vocational Rehabilitation and Employment Programs before the Subcommittee on Economic Opportunity of the Committee on Veterans' Affairs, U.S. House of Representatives, 116th Cong. (June 4, 2019).*

⁴ GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

interviewed representatives from two veteran service organizations selected for specializing in education benefits; and interviewed counselors and the VR&E official responsible for each of three regional offices selected for variation in geography and VR&E plan development accuracy rates.⁵ Across these three regional offices, we interviewed a total of 27 counselors. Their views are not generalizable but provided insights. We limited our review to veterans currently seeking employment.⁶

We conducted this performance audit from August 2018 to December 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.

Background

VR&E Eligibility and Process

To be entitled to VR&E services and related benefits, veterans generally must (1) have at least a 20 percent service-connected disability rating from VA⁷ and (2) be in need of rehabilitation because of an employment handicap.⁸ Entitled veterans may generally receive up to 48 months of vocational rehabilitation services and up to an additional 18 months of

⁵ The offices were in Oakland, California; Nashville, Tennessee; and Togus, Maine. Each of these offices had a different plan development accuracy rate (88.7 percent, 98.6 percent, and 100 percent, respectively) that placed them in the low, middle, and high third of offices nationwide for fiscal years 2016 to 2018.

⁶ VR&E also provides independent living services for veterans not immediately seeking employment because of the severity of their disability.

⁷ VA rates veterans' disabilities that are incurred or aggravated as a result of their military service, referred to as service-connected disabilities, in 10 percent increments up to 100 percent.

⁸ 38 U.S.C. § 3102(a)(1). The law defines an employment handicap as an impairment, resulting in substantial part from a certain type of service-connected disability, of a veteran's ability to prepare for, obtain, or retain employment consistent with the veteran's abilities, aptitudes, and interests. 38 U.S.C. § 3101(1).

employment services, which include counseling, and placement and postplacement services.⁹

If a veteran is entitled to receive VR&E services and found to be employable, a counselor is to work with the veteran to identify a suitable employment goal, and to incorporate that goal and the needed services and benefits to achieve it into a vocational rehabilitation and employment plan (hereafter “employment plan”). To develop an employment plan, the counselor and veteran review labor market information for jobs within the veteran’s identified abilities, aptitudes, and interests that will not aggravate his or her service-connected disability or disabilities. After assessing obstacles to employment, they agree on a written employment plan that describes the employment goal and the services needed to achieve it. Common services provided by VR&E are funding for higher education, career counseling, and short-term employment services like job search assistance.¹⁰ Counselors have the authority to approve a wide variety of educational programs and may approve employment plans that have an annual cost of up to \$25,000.¹¹

VR&E Organization

Within VA’s Veterans Benefits Administration (VBA), the VR&E central office is responsible for overseeing the VR&E program, including training staff and monitoring their work to ensure high performance and consistency. Among other elements, VR&E’s quality assurance efforts entail reviewing a subset of case files on a monthly basis to ensure that the entitlement decisions, development of plans, and delivery of services are performed and documented in accordance with VA regulations, VR&E’s operations manual, and other directives.

⁹ 38 U.S.C. § 3105(b)(1). Eligible veterans for whom a vocational goal is not currently reasonably feasible may receive assistance intended to help them achieve independent living. 38 U.S.C. § 3109.

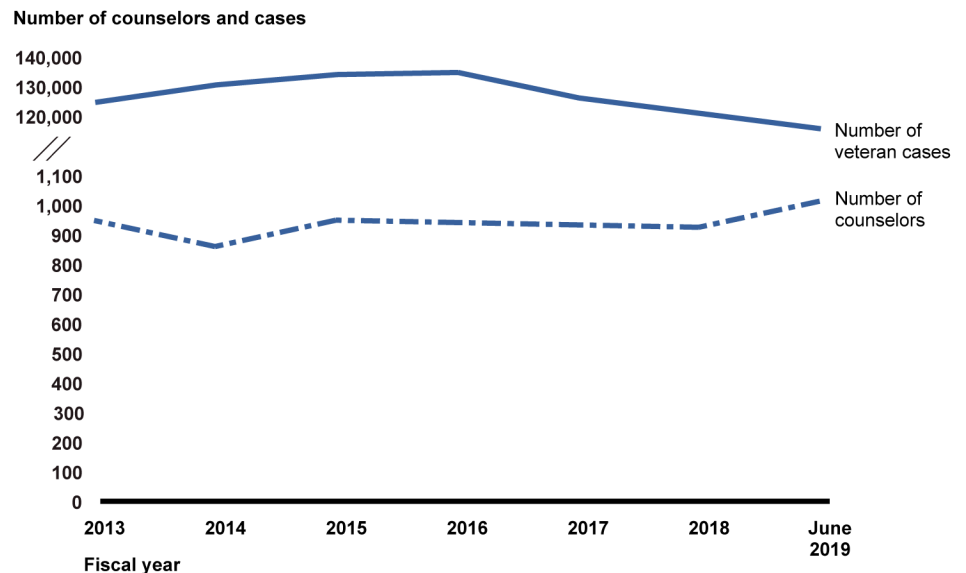
¹⁰ Education and training services may include tuition, fees, books, and supplies. Veterans may also receive tutoring, adaptive equipment, referrals to the Veterans Health Administration for medical, dental, or mental health services, and other services as needed. Many veterans who are receiving VR&E services also receive a monthly subsistence allowance. In fiscal year 2018, 73 percent of VR&E participants who received a subsistence allowance were pursuing an undergraduate degree, according to VA’s annual report on benefits for fiscal year 2018.

¹¹ Counselors’ supervisors must approve plans with an annual cost of \$25,000 or more.

VR&E services are provided by field staff at 56 regional offices and about 300 satellite locations. The satellite locations include college campuses to help veterans successfully complete their training and find employment, as well as military sites to help servicemembers with disabilities as they begin their transition to veteran status and the civilian workplace. VR&E field positions include (1) VR&E officers who manage the program and its staff in each region; (2) vocational rehabilitation counselors who work directly with veterans to assess their entitlement, develop their employment plans, and manage their progress;¹² and (3) staff to support the administration of the program.

As of June 2019, 1,394 field staff members were administering the VR&E program, of which nearly 75 percent (1,026) were counselors. From September 2013 to June 2019, VR&E's total caseload peaked in fiscal year 2016 with almost 135,000 participants (see fig. 1).

Figure 1: Vocational Rehabilitation and Employment (VR&E) Cases and Counselors, Fiscal Year 2013-June 2019

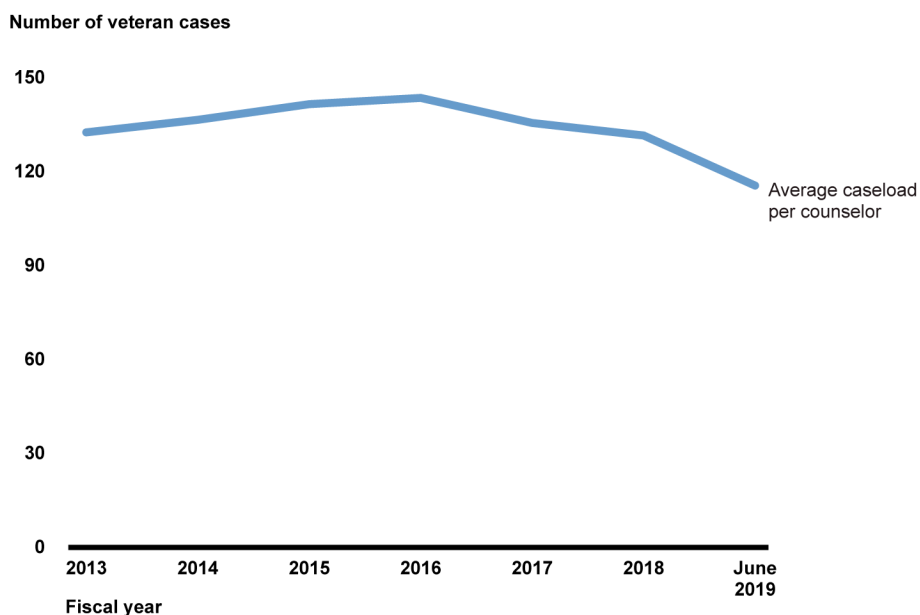


Source: GAO analysis of VR&E data. | GAO-20-28

¹² According to VA, VR&E counselors must have a master's degree or higher in rehabilitation counseling or a related field with at least 30 hours of specific coursework.

Over the same period, the number of counselors changed little until 2019. In 2019, the number increased after VA hired an additional 88 counselors in response to a provision in an appropriations law suggesting that the agency aim to serve 125 veterans or fewer per full-time equivalent counselor.¹³ The increase in staffing helped reduce the average caseload of 130-141 cases per counselor during fiscal years 2013 through 2016 to 113 cases in June 2019 (see fig. 2).

Figure 2: Average Caseload per Vocational Rehabilitation and Employment (VR&E) Counselor, Fiscal Year 2013-June 2019



Source: GAO analysis of VR&E data. | GAO-20-28

¹³ See Pub. L. No. 114-223, § 254, 130 Stat. 857, 894 (2016).

Counselors Generally Considered Common Factors When Developing Veterans' Plans but Noted Inconsistent Application of Those Factors Likely Occurs

Counselors in Our Review Generally Considered a Set of Common Factors When Developing Plans

VR&E counselors consider a set of common factors, including the veteran's disability or disabilities, interests, and local labor market conditions, when developing and approving veterans' employment plans. Program regulations require an assessment of some of these factors when the veteran is initially evaluated.¹⁴ VR&E quality review data from fiscal years 2016 through 2018 suggest that counselors generally documented certain plan considerations during the evaluation.¹⁵ For example, in 98 percent of the 1,080 cases VA reviewed for accuracy in fiscal year 2018, counselors documented the veteran's service needs based on their functional limitations. In 95 percent of cases, counselors documented that they assessed the veteran's abilities, aptitudes, and interests. Lastly, in nearly 99 percent of cases, counselors documented that the veteran was involved in vocational exploration activities such as career searches and labor market research.

¹⁴ Per 38 C.F.R. § 21.50, during the initial evaluation "the following factors will be developed and assessed: (1) The handicapping effects of the individual's service-connected and nonservice-connected disability(ies) on employability and on independence in daily living; (2) The individual's physical and mental capabilities that may affect employability and ability to function independently in daily living activities in family and community; (3) The impact of the individual's identified vocational impairments on the individual's ability to prepare for, obtain, and keep suitable employment; (4) The individual's abilities, aptitudes, and interests; (5) The individual's personal history and current circumstances (including educational and training achievements, employment record, developmental and related vocationally significant factors, and family and community adjustment); and (6) Other factors that may affect the individual's employability."

¹⁵ Quality reviewers check whether the veteran was provided an evaluation sufficient to determine his or her rehabilitation needs and whether the veteran's plan meets those needs. For example, among other criteria, reviewers check whether vocational exploration occurred and whether the plan identified goals and objectives.

During our more focused review of how counselors developed plans for a non-generalizable sample of 34 VR&E case files, we found that counselors generally documented a set of common factors. Consistent with program guidance stipulating that counselors are to consider a veteran’s service needs, abilities, aptitudes, and interests, we identified common consideration factors including one’s functional limitation from disability, prior education, aptitude results, and career interests.¹⁶ Table 1 presents these factors and the number of files in which the factors were documented.

Table 1: Common Factors VR&E Counselors Considered When Developing Veterans’ Plans and Number of Case Files GAO Reviewed in Which the Factor Was Documented

Factor	Number of case files GAO reviewed in which the factor was documented (out of 34)
Functional limitation from disability	34
Job/career interests	34
Vocational aptitude test results	34
Prior education	34
Prior work or military experience	34
Local labor market information	32

Source: GAO analysis of Vocational Rehabilitation & Employment (VR&E) case files. | GAO-20-28

Note: The table is not intended to provide a complete list of all factors that counselors took into consideration during plan development. It represents factors that were documented in all, or nearly all, case files we reviewed.

Our case file review found that 30 of the 34 counselors also documented the estimated cost of VR&E employment plans. According to testimony from a veteran service organization, many VR&E participants are dissuaded by their counselor from pursuing education at a top tier university because of cost. VA’s VR&E operations manual states that if more than one local training or educational facility will meet a veteran’s needs, counselors must justify their decision to select a school that is more expensive than the least costly one. Counselors are not required to document all of the educational facilities that would serve a veteran’s needs; therefore, we could not determine the extent to which counselors

¹⁶ The 34 cases involved a variety of planned educational components: 6 provided for an associate’s degree, 15 provided for a bachelor’s degree, 4 provided for a master’s degree, 1 provided for a PhD, 4 involved training for a license or credential, and 4 did not have an educational component.




chose the lowest cost facility. Counselors we interviewed in each of the three regional offices we visited said that while mindful of cost, they strive to develop employment plans that best meet the needs of the veteran.¹⁷ For example, counselors at one regional office described a situation in which a higher priced school was chosen because the school offered smaller class sizes that better suited the veteran's particular mental health conditions. Of the 34 files we reviewed, the annual plan cost exceeded \$25,000 in 3 cases.¹⁸

Counselors we interviewed said that they considered the veteran's career interests but weighed these interests against other factors, such as the veteran's functional limitations and information about the local labor market. All 34 plans we reviewed aligned with the veteran's stated career goals, though in some cases the veteran's goals evolved after talking with the counselor about alternative occupations. In a few instances among these cases, the final plan's career goal was notably different from the initial goal that the veteran had stated on the program intake form. Table 2 presents examples of how a plan can evolve as a result of career exploration activities and conversations between the veteran and their counselor.

¹⁷ Unless otherwise specified, references to counselor statements in this report reflect comments made by counselors in each of the three regional offices we visited.

¹⁸ The VR&E officer must approve a plan with an annual cost of \$25,000 to \$75,000; the director of the VBA regional office must approve a plan with an annual cost of \$75,000 to \$100,000; and the director of VR&E must approve any plan with an annual cost exceeding \$100,000.

Table 2: Examples of Employment Plan Development in VR&E

	Initial career goal	VR&E counseling activities	Final plan
 Veteran A	Teacher	The veteran and his counselor discussed how his disability could be aggravated by prolonged periods of standing. During VR&E career exploration, the veteran showed interest in security, law enforcement, and computers. He switched his career goal to cybersecurity.	Bachelor's degree in Information Technology
 Veteran B	Airplane pilot	The veteran and his counselor discussed how the veteran's lower back and knee injuries would make operating airplane controls difficult. During VR&E career exploration, the veteran showed interest in aerospace engineering that would involve desk work and satisfy his passion for aviation.	Bachelor's degree in Aeronautical Science
 Veteran C	Nurse	The veteran and her counselor discussed how the veteran's back injuries limited her ability to move patients. The veteran had held military supervisory positions and aptitude tests revealed interests in leading and influencing others. She switched her career goal to healthcare management.	Master's degree in Business Administration

Source: GAO analysis of Vocational Rehabilitation and Employment (VR&E) case files; GAO (icons). | GAO-20-28

Counselors in Our Review Stated They Strive to Develop Individualized Plans but Acknowledged That Some Unintended Differences in Plans for Similarly-Situated Veterans Likely Occurs

Counselors we interviewed described how veterans' employment plans are individually designed to suit a veteran's needs and, as a result, may differ from one another even when veterans have similar goals, characteristics, and circumstances. In some instances two veterans may appear to be similar, but may actually differ in some critical respect that results in appropriate variation across plans. A common difference among veterans is the geographical location where they are seeking employment. Counselors described how a veteran may be encouraged to explore an occupation with many job opportunities within a specific region, while a veteran with similar characteristics and interests living in a different area may be dissuaded from pursuing the same occupation for a lack of job opportunities in the area for that occupation. Local labor markets may also drive the need for a certain type of educational credential. For example, counselors said that some veterans will be competitive in certain labor markets with a bachelor's degree, while others living in a different region with a more educated population may need a master's degree. Likewise, they said that certain occupations, such as certified public accountants or school teachers, may require different forms of credentialing in different states.

Other characteristics of individual veterans may also cause counselors to develop different plans for veterans who appear to have similar circumstances. One counselor we interviewed described a scenario in which one veteran who received a high score on an aptitude test for reading comprehension skills might obtain a certain employment plan while another veteran who received a much lower score would be steered toward a different plan. If the veterans were to compare their final plans, but were unaware of the differences in their aptitude test scores, they could perceive inconsistent treatment. Counselors also described how conversations they have with veterans as they work to develop employment plans can reveal other character traits, such as interpersonal skills, which can lead them to suggest different plans to two otherwise similar veterans. The counselors said that such conversations play an important role towards the development of successful plans.

However, counselors we interviewed in each of the three regional offices we visited acknowledged that unintended variation likely occurs across plans developed for similarly-situated veterans. They explained that the reasons for such potential inconsistency can include (1) the prominent role professional judgment plays in the program and the potential for unintended bias, (2) counselors' different VR&E experience levels, and (3) variations in regional offices' policies.

- **Judgment and bias.** The counseling role is inherently subjective and requires counselors to use their professional judgment in each case. The VR&E operations manual describes counselors' responsibilities in broad terms, stating that counselors are to guide and assist the veteran in making an informed decision on an appropriate plan based on the veteran's abilities, aptitudes, and interests. According to counselors we interviewed, professional judgment enables them to develop a plan that is best suited for the veteran's unique needs, although it also introduces the potential for personal bias and inconsistent plans for veterans with similar circumstances. For example, a counselor we interviewed cited a case in which he saw the need to develop a plan that allowed for a school that was closer to a veteran's home over other, less costly options because of his sensitivity to the veteran's childcare responsibilities. Another counselor in the same office may not have seen the need for that accommodation. Further, counselors we interviewed said that some of their colleagues may be more comfortable suggesting that a veteran reconsider his or her career goal given circumstances such as the veteran's disabling conditions or the local labor market. They explained that while some counselors would be hesitant to make the

veteran unhappy, and possibly angry, other counselors would be more inclined to work through the conflict. Counselors said that they try to mitigate inconsistency by asking their fellow counselors to weigh in on these sorts of judgments, either informally, or at periodic information-sharing meetings.

- **Counselor experience.** Although all counselors have at least a master's degree in rehabilitation counseling or a related field, differences in counselors' levels of VR&E experience may affect their approach to plan development. Counselors at two regional offices noted that the focus of the VR&E program has oscillated between education and employment, with employment being the current primary focus. They said, as a result, a counselor's general approach to plan development could be influenced by the prevailing focus that existed at the time he or she was hired. Counselors also said that, in general, counselors with more experience will tend to approach plan development differently than a less seasoned counselor because they will apply lessons learned from serving many other veterans. For example, one counselor said that, based on years of prior experience and observation, he has developed a better understanding of which local educational programs offer veterans the best chance for success and which do not. He said while he is able to apply his institutional knowledge and experience to do what is best for veterans, a less experienced counselor may not have the same level of knowledge, which could lead to inconsistent plans for veterans with similar circumstances. According to counselors we interviewed, because of the recent hiring of new counselors to meet caseload targets, differences in VR&E experience among counselors may be more pronounced at this time.
- **Regional office variation.** Differences in administrative policies specific to individual regional offices may also contribute to inconsistent plan development. For example, according to program officials, to ensure the soundness of employment plans in the local labor market, some regional offices require management to approve plans involving a master's degree, while others do not. Counselors in one region told us that requiring management approval might dissuade a counselor from developing a plan focused on a master's degree because of the time the extra step would require. They acknowledged that this sort of approval policy could cause inconsistency across counselors' plans and also cause a discrepancy in the number of master's degree programs being approved at one regional office versus another.

In general, the large number of variables involved in the development of employment plans may complicate the ability to determine the extent to which differences among counselors lead to inconsistent plans among veterans. Counselors we interviewed said that given the subjective nature of the program, such inconsistency is likely. However, counselors cautioned against making the plan development process overly structured and formulaic. In their view, a more restrictive approach would eliminate the flexibility that they need to generate plans that suit each veteran's unique needs.

VA Trains Counselors and Monitors Their Performance but Does Not Monitor the Consistency of Employment Plans

VA Trains Counselors to Develop Sound Employment Plans for Veterans

VA trains counselors on developing sound and complete employment plans for veterans. New counselors receive a series of training courses that are developed and deployed through VR&E's central office, and then receive additional courses and mentorship that are delivered through the regional offices. Course topics for new counselors include understanding vocational impairments, developing a rehabilitation plan, and documenting a narrative of the plan. The formal training emphasizes that plans should be individualized to accommodate the veteran's rehabilitation needs, abilities, aptitudes, and interests. Collectively, these trainings take up to 80 hours. As of 2019, experienced counselors—those on the job for at least a year—take up to 20 hours of refresher training each year determined according to how they score on an annual assessment. The assessment evaluates counselors' technical competencies such as knowledge of relevant regulations, vocational assessment and evaluation, and case management. If a counselor scores low on a particular topic, related courses are identified for the counselor to complete.

In designing training for counselors, VA followed principles for strategically developing training that are consistent with a related guide for federal managers.¹⁹ For instance, VA obtained and considered input from multiple sources—including field advisory committees, quality assurance reviewers, and internal site visit auditors—to identify needs for counselor training. For example, questions and input from the field about a policy clarification led to a training about veterans' entitlement to VR&E services. In addition, VA built flexibility into its training curricula for counselors so they could receive training on emerging topics such as implementing new policies throughout the year as needed. VA also has evaluated its training efforts in multiple ways. For example, it has evaluated training courses by surveying counselors to get immediate feedback and by checking with attendees and their supervisors to gauge improvements in skills and knowledge.

VA Checks If Plans Are Complete but Does Not Monitor Consistency among Counselors

VA monitors employment plans to ensure that they are complete, but does not check for consistency among counselors for veterans with similar circumstances. Quality reviews occur nationally as well as locally at each regional office. The purpose of the national reviews is to monitor the quality of regional offices' work such as plan development, whereas the purpose of the local reviews is to help evaluate the performance of individual counselors. Nationally, a centralized quality assurance team monitors the completeness of regional offices' VR&E entitlement decisions, employment plans, and service delivery by reviewing a randomly-selected subset of case files from each regional office on a monthly basis. Among other criteria, reviewers check whether a veteran's plan identified goals and objectives, included an employment focus, and incorporated the veteran's need for various services.²⁰ Locally, VR&E officers or their designees are to review plans using the same criteria. Officers are supposed to review at least three cases per counselor per quality category (e.g., accuracy of evaluation, planning and rehabilitation services) per quarter. Reviewers do not check for consistency among counselors for similarly-situated veterans, at either the national or local levels.

¹⁹ GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

²⁰ In fiscal years 2016 through 2018, national quality reviewers found that counselors documented information (e.g., a narrative of the planning process or evidence of the veteran's goal) necessary to support a veteran's plan in about 95 percent of cases.

VR&E officials we interviewed identified challenges to completing and monitoring local reviews, but VA is addressing these challenges. According to the VR&E officer in each of the three regional offices we visited, it is difficult to complete local reviews given system limitations and their other job responsibilities such as implementing case management initiatives. They said that it is likely that some officers are not completing the required reviews while others are conducting them with varying degrees of thoroughness. Historically, VA has not identified the specific cases VR&E officers are supposed to review locally. Consequently, VA could not determine if VR&E officers conducted the requisite number of reviews or whether officers were selecting cases for quality review uniformly and fairly. In June 2019, during the course of our review, VA began a pilot in five regional offices to centrally and systematically identify the cases officers are to review to gauge individual counselors' performance. The new process and system are intended to help officers conduct and track local reviews as well as to help VA monitor the completion of local reviews. VA plans to expand this process to all regional offices in fiscal year 2020.

Although VA trains counselors to develop complete employment plans and reviews the completeness of some plans, it does not monitor the consistency of plans among different counselors. The code of professional ethics for rehabilitation counselors calls for counselors to be fair in the treatment of all clients and to provide appropriate services to all.²¹ In addition, one of the objectives of VR&E's central office is to provide training and guidance to ensure high performance and consistency among field staff. Several veteran service organizations have testified at congressional hearings that VR&E is marked by inconsistent treatment of similarly-situated veterans. For example, one testimony cited veterans who allegedly received different plan approvals, such as access to graduate level education, merely on the basis of their counselor.²² Unlike for VA staff members who work on disability claim decisions, VA does not compare the output of VR&E counselors by, for example, analyzing responses to identical hypothetical cases for training or monitoring purposes. As a result, in addition to missing a training

²¹ VA partners with the Commission on Rehabilitation Counselor Certification (CRCC), the developer of the professional code, by encouraging counselors to attain and sustain CRCC's Certified Rehabilitation Counselor credential.

²² Cassandra Vangellow, Legal and Policy Fellow, Student Veterans of America, testimony before the Subcommittee on Economic Opportunity of the Committee on Veterans' Affairs, U.S. House of Representatives, 115th Cong., May 17, 2018.

opportunity for counselors about employment plan development, VA does not know the degree to which inconsistency among counselors occurs. For example, the agency does not know the extent to which counselors would agree to a particular veteran's pursuit of a master's degree through VR&E. Moreover, VA cannot respond in an informed way—and take mitigating steps if warranted—to criticisms of subjectivity in the program. VR&E officials explained that the agency has not yet conducted such a comparative analysis because of other priorities, but agreed that it could do so particularly through its training efforts.

Conclusions

VA uses several training and monitoring practices to help ensure that VR&E counselors develop employment plans that help veterans with disabilities obtain and sustain employment. In approving these plans, VR&E counselors use their judgment and discretion fostered in part by their formal education and professional experience in vocational rehabilitation. While our review of a non-generalizable sample of 34 cases found that counselors generally considered common factors in developing employment plans, counselors we interviewed nevertheless acknowledged that counselors may apply the factors differently because of their varying backgrounds and experience levels. The variability of counselors' experiences and veterans' circumstances may make it difficult to determine the full extent of any inconsistency. However, taking steps to examine the prevalence and type of any inconsistency among counselors who, for example, consider the same hypothetical case, would better position VA to mitigate any unfair differences in plans for veterans with similar circumstances. An understanding of how effectively and consistently counselors assist veterans will be even more important in the coming years as VA fully integrates the new counselors hired to decrease the average caseload.

Recommendation for Executive Action

The Secretary of VA should ensure that the Director of VR&E assesses the consistency of VR&E plans among counselors and takes mitigating steps if results warrant. For example, as part of its training efforts, VA could have counselors respond to identical hypothetical veteran cases and, if unfair inconsistencies in plans result, the agency could enhance training on plan development. (Recommendation 1)

Agency Comments

We provided a draft of this report to VA for comment, and its written comments are reproduced as appendix I in this report. VA concurred with our recommendation and said that VBA will develop a consistency study

of VR&E plan development. It emphasized that no two veterans are the same. It also provided technical comments which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Veterans Affairs, and other interested parties. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or curdae@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 II.



Elizabeth H. Curda
Director, Education, Workforce, and Income Security Issues

Appendix I: Comments from the Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS
Washington DC 20420

NOV 12 2019

Ms. Elizabeth H. Curda
Director
Education, Workforce,
and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Curda:

The Department of Veterans Affairs (VA) has reviewed the Government Accountability Office (GAO) draft report: ***VA VOCATIONAL REHABILITATION AND EMPLOYMENT: Additional Assessment Could Enhance Consistency among Counselors*** (GAO-20-28).

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,

A handwritten signature in blue ink, appearing to read "Pamela Powers".

Pamela Powers
Chief of Staff

Enclosure

Enclosure

Department of Veterans Affairs (VA) Comments to
Government Accountability Office (GAO) Draft Report
***VA VOCATIONAL REHABILITATION AND EMPLOYMENT: Additional
Assessment Could Enhance Consistency among Counselors***
(GAO-20-28)

Recommendation 1: The Secretary of VA should ensure that the Director of VR&E assesses the consistency of VR&E plans among counselors, then takes mitigating steps if results warrant. For example, as part of its training efforts, VA could have counselors respond to identical hypothetical veteran's cases, and if unfair, inconsistent plans result, the agency could enhance training on plan development.

VA Response: Concur. The Veterans Benefits Administration (VBA) agrees with the recommendation to assess consistency of Vocational Rehabilitation and Employment (VRE) plans among counselors. However, it is noted that no two Veterans are the same. Plans are individualized for each Veteran. Veterans who, on the surface, appear to be similarly situated may have different abilities, aptitudes, interests, and transferable skills. Additionally, Veterans with the same rating for the same disability may experience different effects from the disability. By the end of December 2019, VBA will create an outline of its strategy, including expected dates, for developing, administering, and fully implementing a consistency study for VRE plan development across the organization.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

Elizabeth H. Curda, (202) 512-7215 or curdae@gao.gov

Staff Acknowledgments

In addition to the individual named above, Mark Glickman (Assistant Director), Joel Green (Analyst in Charge), and David Perkins made significant contribution to the report. In addition, Jennifer Cook, Holly Dye, Alex Galuten, Monica Savoy, Mimi Nguyen, Almeta Spencer, Jeff Tessin, Rosemary Torres Lerma, and Sonya Vartivarian made key contributions.

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