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WOUNDED WARRIOR PROJECT
STATEMENT FOR THE RECORD
HOUSE COMMITTEE ON VETERANS' AFFAIRS
SUBCOMMITTEE ON ECONOMIC OPPORTUNITY
UNITED STATES HOUSE OF REPRESENTATIVES

ON

“EVALUATING THE EFFECTIVENESS OF VA VOCATIONAL REHABILITATION AND
EMPLOYMENT (VR&E) PROGRAMS”

June 4, 2019

Chairman Levin, Ranking Member Bilirakis, and distinguished members of the House Committee on Veterans' Affairs, Subcommittee on Economic Opportunity, thank you for inviting Wounded Warrior Project (WWP) to testify on the effectiveness of the Department of Veterans Affairs (VA) Vocational Rehabilitation and Employment Program.

Wounded Warrior Project's mission is to honor and empower the wounded, ill, and injured service members and veterans of the Post-9/11 generation. Through community partnerships and free direct programming, WWP is filling gaps in government services that reflect the risks and sacrifices that our most recent generation of veterans faced while in service. Through more than a dozen direct-service programs, we connect these individuals with one another and their communities; we serve them by providing mental health support and clinical treatment, physical health and wellness programs, job placement services, and benefits claims help; and we empower them to succeed and thrive in their communities. We communicate with this community on a weekly basis and are constantly striving to be as effective and efficient as possible by matching our programs – and our advocacy before Congress – to meet warriors' needs.

DUTY ★ HONOR ★ COURAGE ★ COMMITMENT ★ INTEGRITY ★ COUNTRY ★ SERVICE





Forming Our Perspective on Veteran Employment

Overview

Currently, the Bureau of Labor and Statistics (BLS) reports an unemployment rate for veterans of 3.8 percent¹. Although this historically low level of unemployment reflects a positive trend across the general veteran population, based on data from our WWP Annual Survey and feedback from our warriors, WWP recognizes that employment, education, and debt remain areas of need for warriors registered with our organization. As discussed in more detail below, our internal data indicates that warriors who are wounded, ill, or injured have additional challenges when faced with the military to civilian transition, and especially in entering into a productive long-term civilian job.

While our population is resilient and able to adapt to life's challenges, sustainable employment is widely regarded as the key to a healthy military to civilian transition. VA's Vocational Rehabilitation and Employment Program (VR&E) helps disabled veterans in that process. Although there are challenges with VA's VR&E Program, there are also areas where there has been much improvement. This testimony will cover our own demographic, the history behind the VR&E Program, current information technology (IT) improvements, and our recommendations for improvement.

Wounded Warrior Project's Employment and Education Demographic

Each year, WWP administers the largest survey of warriors who served on or after September 11, 2001. In 2018, over 33,000 respondents completed the survey, which asks a range of questions to help us better understand the population we serve and adapt our programs, partnerships, and advocacy to meet their needs.

In Focus: Alumni Education

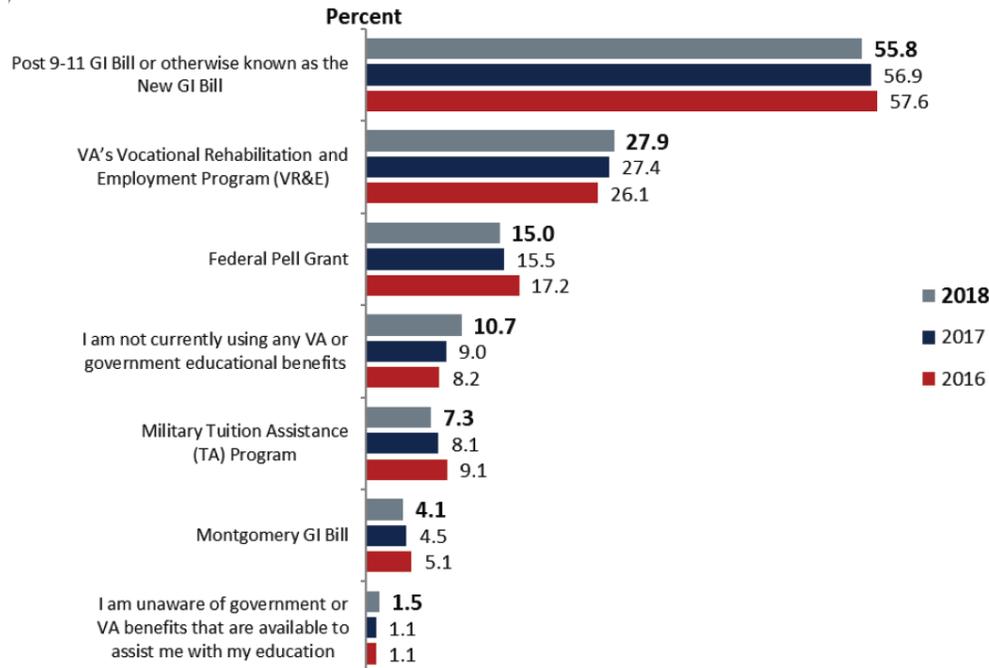
Among 2018 WWP Survey respondents, 55.8 percent indicated they were currently enrolled in an institution of higher education and utilizing the Post-9/11 GI Bill, whereas 27.9 percent of our warriors surveyed indicated they were enrolled in VR&E. Our population has a higher than average usage of the VR&E program compared to the general veteran population. With approximately 900,000 student veterans currently using the Chapter 33 Post-9/11 GI Bill and 125,513 veterans enrolled in Chapter 31 VR&E benefits, around 14 percent of the veteran population is utilizing the VR&E benefit. We attribute this increase of usage in our population to our mission to assist the wounded, ill, and injured veterans of this generation. Additionally, the

¹ <https://www.bls.gov/news.release/pdf/vet.pdf>



WWP survey indicates that the warriors we serve are utilizing the VR&E benefits at higher rates year over year, whereas the usage of the Post-9/11 GI Bill is decreasing each year (see *Figure 1*).

Figure 1. VA or Government Education Benefits Used by School Enrollees



As warriors pursue higher education for employment, some are incurring student loan debt. We know through our WWP Alumni Warrior Survey that financial difficulties can have a negative impact on veterans. The biggest trend that we have seen in student loan debt in our constituency is those with \$30,000 or more in student loan debt increasing steadily since 2016. In 2016, 28.2 percent owed more than \$30,000. In 2018, 32.5 percent owed more than \$30,000 (see *Figure 2*)². Specifically, regarding WWP alumni that are currently enrolled in VR&E, we see that over 33.6 percent have student loan debt of over \$30,000 (see *Figure 3*).

² <https://www.woundedwarriorproject.org/media/183005/2018-wwp-annual-warrior-survey.pdf>

Figure 2. Warrior Student Loan Debt

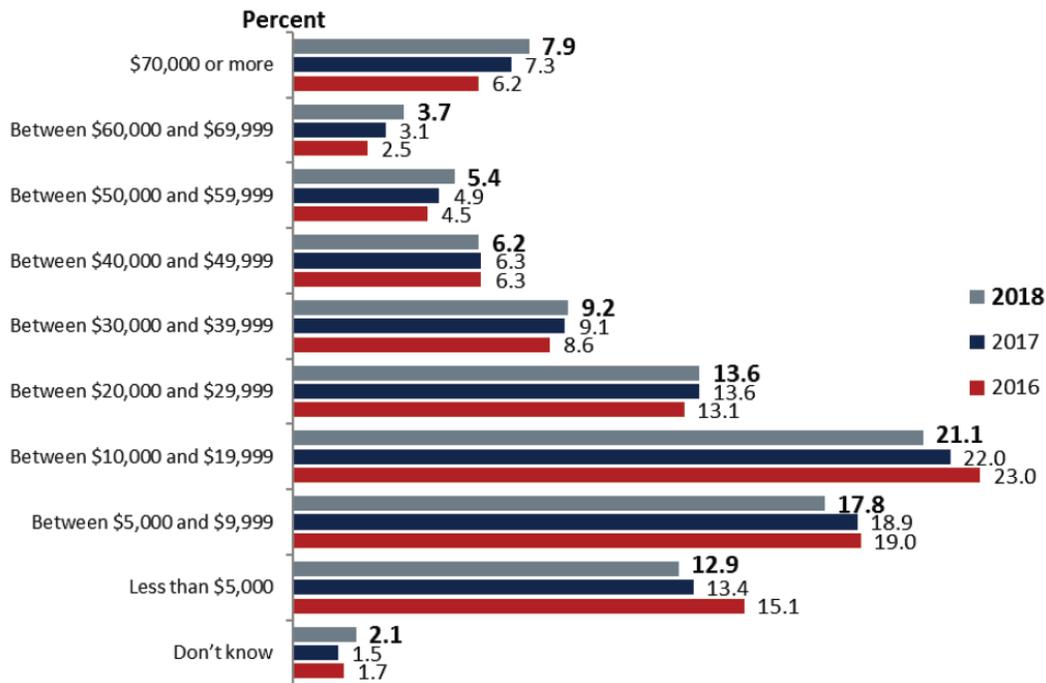


Figure 2. Warrior Student Loan Debt While Utilizing Chapter 31

Warriors in VR&E with unpaid student loans	
Total Unpaid Student Loans	Percentage
Less than \$5,000	9.7%
Between \$5,000 and \$9,999	18.3%
Between \$10,000 and \$19,999	23.1%
Between \$20,000 and \$29,999	15.3%
Between \$30,000 and \$39,999	11.3%
Between \$40,000 and \$49,999	6.3%
Between \$50,000 and \$59,999	6.6%
Between \$60,000 and \$69,999	4.0%
\$70,000 or more	5.4%
TOTAL	100%



In Focus: Alumni in the Work Force

Among all warriors that participated in the survey, 55.1 percent are employed in paid work. Paid work can be considered either full-time or part-time. Eleven percent of our warriors indicated that they were unemployed. This is a decrease from 2016, where 13.2 percent indicated they were unemployed. While we recognized that our unemployment rate is higher than the Bureau of Labor and Statistics findings (BLS), this can be attributed to all respondents in our survey report having a disability status whereas the BLS information includes all veterans. Sixty-two percent of our alumni report having a VA disability rating of 80 percent or more, which can lead to a higher rate of unemployment.

Notably, unemployed warriors indicated the primary reason for not entering into the workforce was:

- 61.7% – Medical/health conditions (or treatment) prevent them from working
- 15.6% – Retired
- 13.8% – In school or in a training program
- 3.9% – Would have liked to work but have become discouraged about finding work and did not look for work in the past 4 weeks
- 3.0% – Family responsibilities
- 2.0% – Other (non-service-connected disability) medical/health condition (or treatment) prevents them from working

In our survey, we asked the 61.7 percent of warriors that indicated “medical or health conditions prevented them from working” to list factors that made it more difficult for them to obtain employment. The top findings included³:

- 33.6 percent indicated that it was due to “mental health issues” and
- 30.1 percent indicated that it was “difficult for me to be around others.”

As VR&E expands its role in ensuring veterans are employed for the long term, those with potential mental health concerns might benefit from additional counseling in civilian workforce assimilation. Recommending veterans with mental health challenges work with a specialist that focuses on integration into the civilian work environment can be as beneficial as physical rehabilitation is for those with physical wounds. Below are comments made by our warriors regarding problems adapting to the civilian workplace:

³ <https://www.woundedwarriorproject.org/media/183005/2018-wwp-annual-warrior-survey.pdf>



- *I only feel comfortable in combat. I do not feel comfortable in civilian life or trust it.*
- *I think the most challenging thing is where in the Military you have a certain routine that everyone is used to and then you get out here in the civilian world, and there's a whole Whirlwind of changes and getting acclimated as well as trying to find common ground with people you'll be exposed to on a daily basis...*
- *Dealing with civilians & finding work that is flexible enough to permit me to go to my appointments.*
- *Regarding difficulty in employment, it is not that no one will hire me because of my injury or disability, but because they later will force me out of the job for that reason because I need to go to the hospital or appointments so much for my disabilities.*

Meeting Needs Through WWP Programs

Wounded Warrior Project's *Warriors to Work* Program assists veterans searching for jobs after military service, with a particular emphasis on providing assistance at transition. This program provides a range of services designed to meet veterans wherever they are in their job-seeking process. We assist warriors with resumé building, job placement, interview skills, and skill translators. WWP recognizes that meaningful employment is critical to a successful transition from military to civilian life. Service-connected disabilities often make finding meaningful and long-lasting employment difficult. As WWP programming is designed to fill gaps in government services and raise awareness for federal, state, and local resources that exist, Warriors to Work staff members regularly recommend the Vocational Rehabilitation and Employment Program to those whose disability affects their long-term employment.

Overview of Chapter 31, Vocational Rehabilitation and Employment Program:

Under Chapter 31 of Title 38, the VR&E program is intended to be an entitlement program that provides employment opportunities through job training and other employment-related services, to include education, job search services, and small business start-up funds. The goal of the VR&E program is to evaluate and improve the veteran's ability to achieve a vocational goal; provide services to qualify for suitable employment; enable a veteran to achieve maximum independence in daily living; and, enable the veteran to become employed in a suitable occupation and to maintain suitable employment as outlined in 38 U.S.C. § 3104; 38 C.F.R. § 21.70(a). Development of an Individualized Written Rehabilitation Plan (IWRP) is required for each veteran eligible for rehabilitation services under Chapter 31, 38 C.F.R. § 21.80(a). An IWRP is prepared in each case when a veteran will pursue a vocational rehabilitation program or an extended evaluation program. The plan will be jointly developed by VA staff and the veteran, and the terms and conditions of the IWRP must be approved and



agreed to by the Counseling Psychologist (CP) or the vocational rehabilitation specialist (VRC), and the veteran. In FY18, 165,943 veterans received evaluation and counseling services with a total of \$1,431,562,000 spent on the VR&E program⁴.

While the VR&E program is primarily an employment service, in the case where a disabled veteran is unable to work, the VR&E program provides independent living (IL) assistance, which is aimed at making sure that eligible veterans are able to live independently to their maximum capacity. For up to 28 months, individuals in the IL assistance program may be entitled to assistive technology; specialized medical, health, and rehabilitation services. Enrollment into the IL assistance program is capped at 2,700 participants per year.

To be eligible for assistance under VR&E, a veteran must have at least a 10 percent VA disability rating and found to have a “*serious employment handicap*,” or at least a 20 percent VA disability rating and found to have an “*employment handicap*.” Once qualified for services through VR&E, a veteran may be placed into one of five different tracks:

- *Employment through Long-Term Services* – The *Employment through Long-Term Services* is for veterans who require university-level education or vocation training to become employable. This track is currently the most frequently used track.
- *Self-employment* – While not utilized as much as some of the other programs, the *Self-employment* program assists veterans in starting their own company with start-up funds, equipment, training, and business plan review.
- *Rapid Access to Employment* – Considered the quickest way to employment, the *Rapid Access to Employment* track relies on a network of vetted employers to place veterans directly into the job field.
- *Reemployment* – If a disabled veteran wishes to and is capable of reemployment in a job they had before their disability occurred, but current working conditions are not suitable for their disabilities, the *Reemployment* track can assist with employer disability training and adaptive equipment for the veteran.
- *Independent Living* – If the disabled veteran is considered unemployable, the *Independent Living* track can assist by offering the veteran 28 months of assistive technology and training on independent living skills.

While VR&E benefits are typically limited to 48 months, these tracks can be extended. Additionally, veterans may change tracks if their disability worsens, which is critical for veterans with medical issues that evolve over time.

⁴ <https://fas.org/sgp/crs/misc/RL34627.pdf>



It is the responsibility of VA to ensure it has made reasonable efforts to inform and assure the veteran's understanding of the services and assistance that may be provided under Chapter 31 to help them maintain satisfactory cooperation and conduct, and to cope with problems directly related to the rehabilitation process, especially counseling services.

History of Chapter 31, Vocational Rehabilitation and Employment Program:

In 1918, P.L. 65-178, the *Vocational Rehabilitation Act* provided retraining assistance for disabled veterans who served in the U.S. military and naval forces and was administered by the Federal Board for Vocational Education. In 1921, administration of the program was transferred to the newly created Veterans' Bureau. In 1943, P.L. 78-16 was enacted which broadened eligibility and authorized up to four years of educational assistance to restore employability to disabled veterans. While in the intervening years the scope of the program has been modified and expanded, in 1999, the name was officially changed to Vocational Rehabilitation and Employment in order to emphasize the program's focus on employment rather than education. The goal was to inform veterans that education was a tool available to those in the VR&E program, but employment was the ultimate goal. In 2003, the Secretary of Veterans Affairs, via the 110 recommendations made by a task force and the Government Accountability Office (GAO), formed the separate employment tracks and indicated that better measures and monitoring with a focus on employment could improve the performance of the program.

The VR&E program is administered by the Under Secretary of Benefits at VA. There are two primary individuals working the day to day operations of the VR&E program. The VR&E Service Director determines policy and priorities and the Deputy Under Secretary of Field Operations manages and allocates employees to 56 regional benefits offices. VR&E uses a decentralized approach that has over 350 local offices and 1,335 staff, including Vocational Rehabilitation Counselors (VRC), Employment Coordinators, and support staff.

In practice, VR&E staff workload is dictated by the number of veterans applying for VR&E benefits, the number of those veterans who enter into the program, the number of new cases versus the completion of current ongoing cases, the change in military strength overall, and the influx in military service-related injuries and illnesses. These are the areas that VR&E leadership should track to judge potential influxes or lapses in case workload.

Current IT and Case Management System Updates

Recently, WWP spoke with the office overseeing the VR&E program at the VA headquarters regarding its new Case Management System, which is replacing its Corporate Windows Remote Shell System (WINRS).



We were very pleased with the current progress of the IT transformations, and the innovate approach this office is taking to address known shortfalls in the VR&E program.

VA will implement seven separate modernization initiatives starting in the first quarter (Q1) of FY19 with scheduled completion in the fourth quarter (Q4) of FY21. Currently, the VR&E program has implemented the first four of the seven initiatives. These seven initiatives are:

- *Initiate eFolder (Q1 FY19)* – Will ensure that VR&E begins using an eFolder to electronically store documents that were formerly completed using paper.
- *Scan Surplus Cases (Q1 FY19)* – Will scan closed cases into the eFolder, so there is a digital archive of all cases.
- *E-Invoicing (Q1 FY19)* – Will create a standardized invoice processing system which will drastically reduce the administrative burden currently placed on counselors and administrative staff.
- *Virtual Assistant (Q2 FY19)* – A virtual assistant program that will assist in scheduling appointments via text messages, emails, and other platforms to ensure counselors can better utilize their time.
- *Centralized Mail (Q4 FY19)* – Will eliminate the need for manual processing in receiving mail and streamline the intake of paper.
- *Active Folder Scan (Q4 FY19)* – Will allow paper reports to be uploaded into the eFolder to helpfully transition to a paperless operation.
- *Case Management Solution Service (Q4 FY19)* – Will utilize all former changes to re-engineer processes to serve veterans better.

Of these seven initiatives, WWP is particularly excited for the Virtual Assistant and E-Invoicing provisions. The Virtual Assistant is an artificial intelligence platform which will enable VA to communicate with the veteran through text messaging or e-mail. One aspect that WWP finds innovative is the ability for veterans to confirm their appointment via text or alter the appointment through the Virtual Assistant.

WWP spoke with Vocational Counselors around the country. They indicated that the E-Invoicing initiative would drastically reduce administrative functions and allow counselors more face-to-face time with veterans. Additionally, warriors going through the VR&E program's *Employment through Long-Term Services* suggest that delayed payments to educational institutions have an extremely negative impact on their performance. These delays are disruptive to the veteran's educational and employment goals. It is our hope that the new E-Invoicing provision will cut down on instances where veterans are denied college supplies, books, and even barred from classes, due to delayed invoice payments or errors on behalf of the VA.



Additionally, VR&E will be introducing a Tele-counseling ability using VA's Video Connect Software. WWP is pleased that VA has incorporated this tool as well. We find that at times, it can be difficult for veterans to drive to a local office due to time constraints or location. Using Tele-counseling will drastically reduce "no-shows" and allow counselors to have more interaction with the veteran. VA has also incorporated *Dragon Speech Recognition* software for counselors to dictate their notes in a timelier manner. VR&E's approach in using Software as a Service (SaaS) such as the *Dragon Speech Recognition* and Virtual Assistant is an innovative approach that we recommend VA adopt more widely. SaaS software can many times be more cost effective, easy to update, and easy to change as technology evolves and becomes more complicated. We applaud VR&E for being one of the first VA offices to utilize commercial-off-the-shelf (COTS) products to more efficiently achieve positive results for veterans.

WWP is optimistic for the current IT and Case Management Software updates that VA has and will continue to implement in the upcoming fiscal year. We find it encouraging that many of the provisions outlined in this section were recommendations made by VSO testimony in previous years.

VR&E 20 Year Study

In 2008, Congress enacted P.L. 110-389, the *Veterans Benefits Improvement Act of 2008*. This legislation required VA to conduct a 20-year longitudinal study of veterans who entered into one of the five VR&E tracks. Three cohorts from FY10, FY12, and FY14 were chosen to be a part of the study. The intent is to determine long-term employment outcomes after a veteran exits the VR&E program.

In a GAO report from 2014 titled, *VA Vocation Rehabilitation and Employment – Further Performance and Workload Management Improvements are Needed (GAO-14-61)*, GAO advises VA to increase their management and data collection on this 20-year study.

These annual reports help organizations like WWP identify areas where we might need to focus information for our constituents. In 2016, VA released information showing that 81.2 percent, or 111,270 individuals, participating in Chapter 31 education benefits are OEF, OIF or OND veterans⁵. This information helps WWP understand where potential lapses in care might be and how we can assist.

Recommendations for Improvement

Raise Awareness and Improve Clarity/Intentions

The process to enroll in Chapter 31 educational benefits appears significantly different between locations where the program is offered. While one veteran is entitled to participate in a graduate degree

⁵ Vocational Rehabilitation and Employment (VR&E) Longitudinal Study (PL 110-389 Sec. 334), 2017.



program, another veteran will be authorized for an associate degree program even though both veterans have similar backgrounds and goals. This is primarily due to an ambiguous and seemingly subjective process for the establishment of the entitlement. WWP recommends that the VA and the VSO community educate veterans on the intent of the program before applying for VR&E benefits. This benefit is an employment benefit that utilizes education as one of its many tools for employment. For the *Employment through Long-Term Services* to be considered the correct track, the veteran's disability must be interfering with their ability to obtain employment and their education benefits already depleted. This program is not an additional education program to assist the veteran in obtaining a masters or higher education degree debt free. However, if a counselor deems that a master or higher education degree is in the best interest of the veteran due to their disability, then they can authorize the veteran to enroll in classes.

Additionally, there is anecdotal evidence of applicants being told to a) apply to less expensive online programs; b) denied approval with little explanation, and c) refused utilizing of the program for a graduate level degree even if it is in the best interest of the veteran. We have also heard from VRCs that inappropriate staffing is a continual issue, especially in large population locations, and counselors are continually pressured by leadership to lower the average cost of each veteran using the program. A common complaint we have heard from veterans is the inability to switch to another counselor if they feel their current counselor is not assisting with reaching their employment goals. These are all issues that we recommend VA address with internal policy changes.

Increase Subsistence Allowance

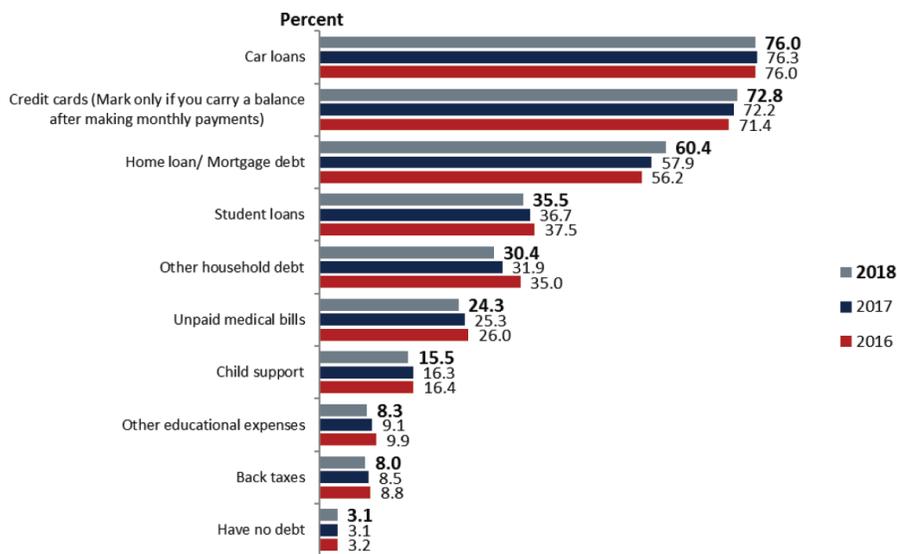
WWP requests that VA align its subsistence allowance to those outlined in Chapter 33 of Title 38. While a subsistence allowance is necessary for a veteran to complete the Chapter 31 employment goals, a common complaint is the amount does not translate equally among rural areas versus city living. The VR&E subsistence allowance of approximately \$900 per month does not have the same financial assistance power in Los Angeles, CA as it does in Charleston, SC. We have heard of reports where veterans discontinue their participation in the program due to financial difficulties. In the 2014 GAO report, 18 percent of veterans who withdrew from their employment services cited "financial difficulties." Another 27 percent indicated "family obligations," which could be considered financial difficulties as well depending on the situation⁶.

According to our 2018 Warrior Survey, the top three most common forms of debt are car loans, credit cards, and mortgage debt (*see Figure 3*). A veteran experiencing financial hardship regarding their car or home loan will affect their ability to attend VR&E courses or counseling. Because "financial difficulties" are common with those enrolled in VR&E, we recommend a pilot program to assist veterans deemed to be at risk of

⁶ <https://www.gao.gov/assets/670/660160.pdf>

financial hardships to receive financial literacy classes through VR&E. If a large population of veterans is discontinuing their participation due to financial hardships, a program to address financial issues before they become catastrophic could increase the veteran completion rate.

Figure 3: Current Forms of Debt



Counseling and Financial Assistance

As outlined by the comments our warriors made regarding the workforce (see “*In Focus: Alumni in the Work Force*”), warriors often feel challenges in transitioning from the military to the civilian workforce. They can feel left out or unwelcomed, and at times, isolated. Because of this, WWP recommends a pilot program offering mental health counseling to those with invisible wounds and general classes on adapting to the civilian workplace for all veterans receiving VR&E counseling. WWP also recommends that VRCs emphasize the need to attend medical appointments while participating in the program because sufficient health maintenance can become more challenging upon entering the workforce.

Additionally, due to the high amount of student loan debt for those with disabilities rated at 100 percent, WWP recommends that VR&E counselors include Department of Education Student Loan discharge information for any veteran who is 100 percent VA disabled.



Change the Program Name

WWP recommends VA change the name of Chapter 31, *Vocational Rehabilitation and Employment* Program. We recommend VA remove the word “*Rehabilitation*” and replace it with something more appropriate for 21st-century life. At the present time, the word “rehabilitation” or “rehab” is associated with programs for those seeking assistance for substance abuse. In 1918, when the VR&E program was launched, “rehabilitation” was defined as:

- *Noun 1. Rehabilitation - the restoration of someone to a useful place in society*
 - *the treatment of physical disabilities by massage and electrotherapy and exercises* ⁷

Today, that same term is defined by the same dictionary as:

- *Noun 1. Rehabilitation - the action, process, or result of rehabilitating or of being rehabilitated: such as:*
 - *the process of restoring a person to a drug- or alcohol-free state*
 - *process of restoring someone (such as a criminal) to a useful and constructive place in society* ⁸

While the word “rehabilitation” was appropriate in 1918, it is no longer widely used in the same fashion today. To alleviate confusion among those not familiar with the program, including prospective employers, Congress should consider a new name that more appropriately conveys the nature of the VR&E program to civilians in 2019 and beyond.

Improve Staffing Model

Current statute requires VA to maintain a VR&E Counselor to veteran ratio that does not exceed 125 veterans to one full-time employee⁹. While VA has hired additional counselors, and the improved IT and Case Management System are promising, we recommend that Congress and VA reevaluate what an appropriate ratio is. It might be that with more complex cases going through VR&E 125 is too many or that with the new Case Management System and other IT changes, Vocational Counselors are able to serve more veterans at one time and not become overburdened.

⁷ <https://www.webster-dictionary.org/definition/Rehabilitation>

⁸ <https://www.merriam-webster.com/dictionary/rehabilitation>

⁹ P.L. 114-223



Improve the Self-Employment Track

The *VR&E Self Employment* track is for veterans who have limited access to traditional employment and might need a flexible work environment to accommodate disabilities. Assistance may include business plan development, training in operations of small business, and most importantly, access to start-up funds for a small business. Access to capital is considered one of the biggest barriers of entry for starting a small business. While we agree that the *Self Employment* track is not suitable for everyone, we do feel that it is currently underutilized due to the complexity and risk in establishing a successful employment outcome for someone wanting to start their own business.

Wounded Warrior Project recommends a closer look into this track to find ways to work with other federal organizations, such as the Veterans Employment and Training Service office at the Department of Labor and the Small Business Administration to promote this track to more veterans while ensuring proper spending of public dollars.

Improve Employment Placement

The ultimate goal of the VR&E program is to provide long-lasting employment. There is a direct correlation between job satisfaction and the likelihood of resigning from a job within 12 months. According to a national survey of American workers, 40 percent of employees who reported an expectation to leave their job within the first 12 months cited that they were “less than satisfied” with their employment¹⁰. We also know through our survey that veterans are gravitating towards federal, state, and local government jobs¹¹. In 2015, 32 percent of all new government hires were veterans¹². While veterans are applying for these open positions in record numbers, we have heard from VRCs that it can be difficult finding federal employment for participants. This can be due to the complexity of applying and obtaining employment in the federal government. WWP recommends a pilot program to streamline veterans who are in the VR&E program into open positions at VA. By working with VA’s internal Human Resource Office, the VR&E program can direct veterans into healthcare related fields with the goal of filling critically needed VA positions. Currently, there are 45,239 open vacancies at the VA¹³ and around 125,000 participants in the VR&E program. This seems to be a natural fit for those looking for employment.

¹⁰ http://www.hrcouncil.ca/documents/LMI_satisfaction_retention.pdf

¹¹ <https://www.woundedwarriorproject.org/media/183005/2018-www-annual-warrior-survey.pdf>

¹² <https://federalnewsnetwork.com/hiring-retention/2016/11/veterans-made-32-percent-new-government-hires-2015/>

¹³ <https://www.va.gov/opa/pressrel/pressrelease.cfm?id=5104>



Closing Remarks

While Chapter 31, Vocational Rehabilitation and Employment Program have some exciting changes in the form of how it administers the benefit, there remain concerns and areas for increased investment and focus. In FY18 there were:

- 27,194 new enrollees,
- 66,772 participants who carried over from FY17,
- 597 were added into the Independent living program,
- 10,735 were in a non-education employment program,
- 794 were in an education program,
- 603 gained employment,
- 3,268 were considered employable but did not have a job, and
- 15,550 were discontinued

Most concerning is the 15,550 veterans that were discontinued from the program and the 3,268 veterans that were considered employable but had not received a job yet. While the new case management system will likely assist the Vocational Rehabilitation Counselors with bandwidth issues, we hope that VA does not increase case workload, but instead, focus on lowering these two data points and addressing more deeply the needs of veterans seeking work. While there will always be veterans who do not perform at the standard needed to remain in a program, this amount seems unusually high. It is our assumption that some of the veterans that were discontinued were due to issues that could have been resolved if the counselor had the time to understand the individual frustrations or limitations of the veteran.

Wounded Warrior Project thanks the Subcommittee on Economic Opportunity, its distinguished Members, and all who have contributed to the policy discussions surrounding this issue. We share a sacred obligation to serve our nation's veterans, and WWP appreciates the Subcommittee's effort to identify and address challenges and successes we see within VAs Vocational Rehabilitation and Employment program.