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## Chapter 5 SYSTEMATIC ANALYSIS OF OPERATIONS (SAO)

### 5.01. Introduction

The Systematic Analysis of Operations (SAO) provides the methodology and framework to examine logically a Vocational Rehabilitation and Employment (VR&E) office's activities and processes in administering the Chapter 31 benefits. An SAO assists VR&E management, supervisors, Regional Office (RO) management, VA Central Office program managers, and auditors from the Inspector General (IG), the General Accounting Office (GAO), and other agencies in identifying and analyzing the most critical elements of the program.

### 5.02. References and Resources

Laws: 38 U.S.C. 3118  
Rehabilitation Act of 1973 (Amended)

Regulations: 38 CFR 21.60  
38 CFR 21.62  
38 CFR 21.196  
38 CFR 21.198  
38 CFR 21.222  
38 CFR 21.283  
38 CFR 21.380  
38 CFR 21.382  
Federal Acquisition Regulations (FAR)  
VA Acquisition Regulations (VAAR)  
VA Policy Handbook, Appendix A

VA Forms: VAF 28-1900, Disabled Veterans Application for Vocational Rehabilitation  
VAF 28-8872, Rehabilitation Plan

### 5.03. Methodology

#### a. Components of an SAO

The basic components of an SAO include a structured data collection system, method of analysis and reporting format. Analyses must be both valid and reliable to ensure that the results truly represent the process being examined and that a separate analysis would result in consistent findings.

Critical factors in executing an effective SAO consist of the following:

### 1. Selecting a Random Sample

Randomly select samples of work to ensure validity and reliability of results. A percentage of the workload may be taken in order to select sample sizes of populations effectively. This could be performed by selecting 10 percent of the total number of cases in a given status. As necessary, increase and stratify the sample to assure equal representation by case managers.

Example: If CWINRS indicates 136 cases in Job Ready (JR) case status and there is only one case manager involved, select 14 cases for analysis. If there are three case managers with approximately equal caseloads, increase the selection count to 15 cases and randomly select five cases for each case manager for analysis.

### 2. Creating an Audit Trail

A VR&E office must maintain completed analyses as outlined in the Records Control Schedule (RCS), VB-1, Part I, Item 13-098.000. The office must retain all data and work sheets used in each analysis for two years following the resolution of any problems identified within the analyses.

The office must also maintain a separate list of the claim numbers of cases that were reviewed so that a subsequent analysis can utilize the identical sample with the same raw data.

An audit trail allows replication of a specific SAO and validates its results by local management analyst, a VA Central Office site visit team, or other auditors.

### 3. Collecting Data

The data for the analyses may be obtained from the CWINRS Intranet Reports, Performance Analysis and Integrity (PA&I) Reports, the Veterans' Counseling/Evaluation/Rehabilitation (CER) folders and records for vouchers, payments, etc.

The analyses may also utilize data from the results of the Systematic Technical Accuracy Review (STAR) conducted nationally by VR&E Service and locally by a VR&E Officer (VREO) or his/her designee. However, the STAR data must be applicable and must be focused on specific areas or issues of the analyses.

Additionally, the reviews must have been conducted within one year from the development of the analyses. For example, the STAR data for an analysis conducted in October 2012 will include the data from the local QA reviews conducted no earlier than October 2011. This is also referred to as the SAO period.

#### 4. Arraying Data

The Microsoft Excel spreadsheets may be used to array data for analysis.

#### 5. Determining Frequency of Analysis

An office must conduct an analysis on a program area every 12 months. However, frequency of analysis depends on the significance and vulnerability of the area and the nature of findings from previous analyses. Thus, if an analysis yields considerable deficiency, the subsequent analysis for the particular area may be conducted quarterly or semi-annually, until the identified deficiency is resolved.

The VREO, the RO Director, or the Director of VR&E Service, may request analyses more frequently than every 12 months.

#### 6. Establishing Continuity of the Analysis-reporting Format

Each analysis is an extension of an earlier analysis and is as relevant to the one preceding it and the one following it. An analysis may directly respond to the findings and recommendations of the previous analysis. The subsequent analysis should consider, and if necessary, further develop the results of follow-up and corrective actions.

#### b. Reporting Format

An SAO must be prepared and submitted in a memorandum format to the RO Director using the guidelines provided in this chapter. Each SAO report must be organized logically to enhance consistency of analysis between reports.

An RO may establish a local protocol for this report, but the protocol must include at least the following sections:

##### 1. References

Cite the applicable statutory or regulatory and manual guidelines, circulars and/or policy letters used for the specific area of analysis.

2. Purpose

State the purpose of the analysis. In addition, state whether it is a regularly scheduled analysis or a follow-up of a prior analysis that required action.

3. Requirements

Briefly describe the required procedures for properly executing the specific area of analysis. For example, if the area of analysis is employment services, describe clearly the processes involved in providing those services.

4. Analysis

Describe the steps in the analysis. This should include the randomization technique, sample size, data source, and method of analysis.

5. Findings

Summarize the results of the analysis. The summary must provide the following:

- (a) A determination of how the office is performing in the area of analysis.
- (b) Identification of deficiencies or best practices found during the analysis.
- (c) Possible cause(s) for the identified deficiencies.

6. Conclusions

Discuss the implications and consequences of the findings applicable to the specific area of analysis. For example, if deficiencies are found, explain how the deficiencies affect the office's performance and the potential vulnerabilities that may be caused by the identified deficiencies.

7. Actions and Recommendations

Provide a plan that outlines the actions or next steps to address and resolve the identified deficiencies. The outline should also include the extent and required period of corrective actions.

The recommendations must clearly indicate whether the actions are corrective in nature or are designed only to implement innovative or more effective procedures.

#### 5.04. Scope of Analysis

The scope of analysis includes the most critical and vulnerable components of the program. These components are divided into four major program areas and are subdivided into critical elements.

Additional analysis may be required that may include, but are not limited to, time-limited pilot programs and programs with few participants.

The following major areas provide the critical elements for each analysis:

##### a. Chapter 31

Critical elements of the Chapter 31 services include initial evaluation, extended evaluation, employment services, independent living services, inactive cases and case closures.

##### b. Debt Avoidance and Fiscal Control

Critical elements of debt avoidance and fiscal control include authorization of subsistence awards, authorization, control of program costs and contracting activities.

##### c. Staff and Office Management

Critical elements of staff and office management include position descriptions and performance standards, staff qualifications, development, and training, staff configuration and strength, resource allocation and use.

##### d. Other Program Areas

Critical elements of other program areas include motivation and outreach, other program areas, activities of the Vocational Rehabilitation Panel and administrative reviews, advisory opinions, appeals and equitable relief.

#### 5.05. Guidelines for Executing an SAO

This section provides the critical components of the program and outlines the specific elements for conducting a systematic analysis. This also specifies the issues relevant in each process and essential for the assessment.

## a. Chapter 31 – Vocational Rehabilitation

## 1. Initial Evaluation

The initial evaluation determines an applicant's eligibility for and entitlement to services under the Chapter 31 program. It also assesses the Veteran needs and the services necessary to achieve their rehabilitation goal. It is essential that the Veteran complete the initial evaluation timely and that responsible staff make accurate and consistent decisions.

The data may be obtained from the CWINRS Intranet reports. Other data may be collected manually, by observation, or other means.

## (a) Timeliness

This analysis focuses on the timeliness for processing the claimants' application for Chapter 31.

For this analysis, answer at least the following questions:

- (1) What is the average number of days of cases placed in Applicant (APP) status and in Evaluation and Planning (EP) status?

This average is available on a monthly basis from the CWINRS Intranet reports. How much of this time is attributed to the Veterans Service Center (VSC) processing? Observations should include local trends, as well as differences between local and national data.

- (2) Are there significant differences in duration of cases remaining in APP status and EP status among case managers?

To obtain the data to answer this question, take the following steps:

- Select a random sample by cases assigned to a Vocational Rehabilitation Counselor (VRC).
- Review the CWINRS Intranet Reports to establish the timeliness of processing pending Control Code (CC) 719.
- Obtain data on the previous month's timeliness by count and percentage from the BDN Work in Progress Pending (WIPP) W-20 screen.

- Compare these data with available local data.
- (3) How does this office's percentage of ineligible determinations in relation to Employment Handicap (EH) compare with the national data?

These data are not readily available and therefore, must be calculated manually. Follow the steps provided below to extract data for calculation:

- Access the PA&I Reports (VR&E) and click on the Case Status Movement Detail Report - Regional Office.
  - Select Date Range for data from the options (from/to or FY).
  - Select Retrieve Data and create an Excel spreadsheet to array the data.
  - To obtain the number of non-entitlement for applications received during the selected date range, sort the Excel spreadsheet by Current Case Status (Discontinued), then by Previous Case Status (Application). The Reason Code column for each of the records will contain a Non-pursuit reason code from Applicant Status.
  - Next, scroll to Current Case Status (Discontinued), then by Previous Case Status (Evaluation/Planning). The Reason Code column for each of the records will contain a Disallowance reason code as well as a Non-pursuit from Evaluation/Planning reason code.
- (4) Is there a noticeable difference between local and national data? What is the explanation for the difference?
- (5) How does this office's data for Veterans or Servicemembers applying for Chapter 31 and not pursuing their claims compare with the national data?

Follow the same steps on Item a.1(c) of this section.

(6) Is there a significant difference between local and national data? If the response is Yes, explain.

(b) Accuracy of Entitlement Decisions

This section focuses on the appropriateness of the decision on a Veteran's entitlement or non-entitlement to vocational rehabilitation services.

Data for this analysis may be obtained through the results of the QA reviews conducted nationally by the STAR Team and locally by the VREO or designee.

For this analysis, answer at least the following questions:

- How does this office's accuracy of entitlement decision compare with the national data?
- What is the error rate between the decision for entitlement and non-entitlement for this office?
- What is the error rate among the VRCs in this office?
- Is there a significant difference in the error rate among the VRCs?
- Is there a pattern for errors identified in the entitlement decisions? If yes, identify the pattern(s).
- Are corrective actions for national and local reviews completed correctly and timely?
- Are there follow up activities or measures for corrective actions that are not completed?

2. Extended Evaluation

Extended evaluation determines whether the Veteran's ability to achieve a vocational goal is currently and reasonably feasible. For a case to be placed in Extended Evaluation (EE) status, the Veteran must be found entitled to vocational rehabilitation services and must have been determined with a Serious Employment Handicap (SEH). In addition, the case may have been referred to the Vocational Rehabilitation Panel (VRP) for review and recommendations.

The data for this analysis may be obtained through the recommended sampling procedure for cases in Extended Evaluation status within the SAO period.

For this analysis, answer at least the following questions:

(a) Requirements

- Is the decision to provide extended evaluation services and to place the case in Extended Evaluation status correct?
- Are justifications for all decisions documented properly?

(b) Individualized Extended Evaluation Plan (IEEP)

- Are the identified needs addressed in the IEEP?
- Do the services outlined in the plan correspond with the Veteran's identified needs?
- If vocational training is part of the extended evaluation services, is the vocational objective consistent with the regulatory and manual guidelines?
- What are the types of disability conditions that predominate in extended evaluation cases?

(c) Services

- What are the types of services provided? Is there a pattern with the types of services?
- What is the average number of days for cases maintained in this status?
- Does this length of time show a trend in direction from earlier reports?
- Are the cases monitored properly with appropriate follow-up actions?

3. Employment Services

This aspect of the program assists Veterans in obtaining and satisfactorily adjusting to a suitable employment. A Veteran may be directly provided

employment services from Evaluation and Planning status or while in Job Ready status. Prior to placement in Job Ready (JR) status, the Veteran must have been declared job ready.

The data for this analysis may be obtained through the recommended sampling procedure for cases in JR status within the SAO period.

In analyzing this area, answer at least the following questions in the following categories:

(a) Job Ready Determination

- Is the determination for the Veteran's job-readiness conducted prior to placing his/her case in JR status?
- Is the job-ready determination documented clearly in the Veteran's CER folder?

(b) Individualized Employment Assistance Plan (IEAP)

- Does the IEAP include appropriate employment services?
- Is the IEAP currently updated and within the statutory limit of 18 months?
- Has the IEAP been developed at least 60 days prior to the projected completion of the Veteran's training objective?
- Does the CER folder contain a copy of the Veteran's resume, applications for federal employment, a state or local government?

(c) Services

- Has a direct referral been made to the state employment service and/or documented evidence that the Veteran declined referral?
- Has appropriate employment assistance such as referral to a Disabled Veterans' Outreach Program (DVOP) specialist, a Veteran's preference letter, Work Opportunity Tax Credit, or special employer incentives and job readiness skills assessment (resume writing, job interview skills, etc.) been discussed with or recommended to the Veteran?
- Is payment of Employment Adjustment Allowance (EAA) made timely and correctly?

- If a Veteran is not entitled to EAA payment, is the Veteran informed in writing and the decision clearly justified in his/her CER folder?

#### 4. Independent Living Services

Independent Living services are provided to Veterans whose achievement of a vocational goal has been determined to be currently reasonably infeasible. This program of services assists the Veterans to achieve and maintain independence in their daily living.

The data for this analysis may be obtained through the recommended sampling procedure for cases in Independent Living (IL) status within the SAO period.

In analyzing this area, answer at least the following questions in the following categories:

##### (a) Workload

- How does this office's IL workload compare with the national IL workload?
- Is there a noticeable difference between this office's and the national workload? If yes, explain the difference.

##### (b) Requirements

- Is the determination for feasibility of the Veteran's achievement of a vocational goal thoroughly conducted and clearly documented prior to placing the case in IL status?
- Is a comprehensive IL assessment including the preliminary IL assessment conducted prior to the development of the IL plan?
- Is the comprehensive IL assessment conducted by an individual with specialized IL training or experience?
- Are the IL needs clearly identified and explained?

##### (c) Individualized Independent Living Plan (IILP)

- Is the IILP developed comprehensively?

- Is the IILP currently updated and within the statutory limit?
- Do the IL services outlined in the IILP correspond to the Veterans' identified needs?
- Is the duration of services in the IILP specified correctly and has the period of IL services not expired?
- Is the IILP concurred by the VREO?

(d) Services

- Are services and necessary equipment provided timely to the Veterans?
- Are requests for extension of IL services submitted and obtained timely?
- What is the percentage of Veterans receiving vocational training while in IL status?
- Is the decision to provide vocational training under an IILP appropriate?
- What is the percentage of Veterans receiving assistance with Specially Adapted Housing (SAH)?
- Is SAH assistance provided timely?
- What is the percentage of Veterans receiving assistance with Home Improvement and Structural Alterations (HISA)?
- Is HISA assistance provided timely?

5. Inactive Cases

This section focuses on the office's inactive cases to ensure that these are placed in the respective statuses correctly and the Veterans continue with their participation in their programs.

(a) Cases in Rehabilitated To the point of Employability (RTE) status without Subsistence Allowance paid for over Nine Months

The VREO must ensure the validity of cases placed in RTE status without receipt of subsistence allowance for more than nine months.

All cases without valid reason for remaining in RTE must be identified to ensure that assistance is provided to the Veterans to continue with their rehabilitation programs.

In analyzing this area, answer at least the questions in the following categories:

- How many cases in RTE status have not received subsistence for more than nine months?
- What is the percentage of cases in RTE status that have not received subsistence for more than nine months as compared to all cases in RTE status?
- What percentage of these RTE case status assignments is valid?
- Is there a trend in the data?
- What steps are taken when invalid placement of cases in this status is identified?

(b) Cases in Interrupted (INT) Status

The VREO must ensure that cases placed into INT status include a reasonably estimated time of the Veteran's anticipated return to continue receiving rehabilitation services. Payment of subsistence allowance must be stopped timely. Follow-up actions must be established to ensure that contacts are maintained with the Veterans to provide services for which eligibility remains and to motivate them to return to active program participation.

In analyzing this area, answer at least the questions in the following categories:

- Is the decision for interruption justified and clearly documented in the Veteran's CER folder or CWINRS Notes?
- Is the subsistence allowance award terminated correctly and timely?
- Is there a local mechanism established to monitor interrupted cases with pending actions?

- What is the percent of cases in this status as compared to the workload?
- What is the percent of cases in this status over six months?
- What is the average number of days for cases maintained in this status?
- Is the average number of days in this case status increasing, decreasing, or stable?
- How does this office's average number of days compare with the national average?
- How does this office's percent of cases in this status compare with the national percentage?
- How does this office's percent of cases in this status over six months compare with the national percentage?
- Are there significant differences between this office's and the national average number of days and percent of cases?
- How many cases are returned to active case status?
- How many cases are placed in Discontinued (DIS) status?
- Is the number of cases in DIS status higher than those returned to active status?

#### 6. Case Closures

A case is closed from a plan of vocational rehabilitation services by either placing the case in Discontinued (DIS) status or Rehabilitated (REH) status.

The data for this analysis may be obtained through the recommended sampling procedure for cases in placed in Rehabilitated status, Discontinued status and Discontinued status using the Reason Codes (RC) for Maximum Rehabilitation Gains (MRG) within the SAO period.

##### (a) Rehabilitated Cases

A case is placed in Rehabilitated status under 38 CFR 21.196 and 38 CFR 21.283. Except for a Veteran receiving only Independent Living

services, the case must be placed initially in Job Ready (JR) status and must be followed up for at least 60 days following placement into suitable employment before declaring the Veteran rehabilitated.

When analyzing this area, answer at least the following questions:

- What techniques and strategies contribute to successful rehabilitation?
- Are certain case managers more successful in rehabilitating Veterans?
- What factors contribute to this success?
- Is there a geographical difference in the rate of success?
- For similar objectives, is there a difference between types of training programs? For example, on-job training in comparison with institutions of higher learning or technical school
- Do special employer incentives contribute in these rehabilitations?
- Do Veterans receive an Employment Adjustment Allowance (EAA) in accordance with policy and procedures?
- Is the decision to rehabilitate the Veteran justified appropriately and documented clearly in the CER folder?
- Is the VREO's concurrence provided on all rehabilitated decisions?
- Are corrective actions for national and local reviews completed correctly and timely?
- Are there follow up activities or measures for corrective actions that are not completed?

(b) Discontinued Cases

A case is placed in Discontinued status under 38 CFR 21.198. However, each case that is discontinued must have been placed in Interrupted status prior to closure, except for a case closed as discontinued with RC 99, Death of Veteran.

When analyzing this area, answer at least the following questions:

- Is the decision to discontinue the case justified appropriately and documented clearly in the CER folder?
- Are there grounds for initiating procedures to recoup the costs of supplies under 38 CFR 21.222? If the response is Yes, what action(s) is/are taken?
- Are the Veterans provided with due process and their appeal rights for proposed adverse actions or executed adverse actions?
- Is the VREO's concurrence provided on all discontinued decisions?
- Do certain case managers have a higher number of discontinued cases than others?
- For higher number of discontinued cases, what is the major cause?
- Are corrective actions for national and local reviews completed correctly and timely?
- Are there follow up activities or measures for corrective actions that are not completed?

(c) Maximum Rehabilitation Gains (MRG) Cases

A case is placed in Discontinued status with MRG determination if rehabilitation services contributed to a Veteran's employment that does not meet the criteria for rehabilitation, or that rehabilitation services substantially improved the circumstances of a Veteran who is not currently employable in a suitable job.

When analyzing this area, answer at least the following questions:

- Is the decision to use MRG for discontinuance appropriately justified and documented in the CER folder?
- What is the percentage of MRG cases in relation to the total number of discontinued cases within the SAO period?
- What is the percentage of cases with error in using MRG in relation to the total number of cases closed with MRG?
- Is there a pattern in the identified errors? If yes, identify the pattern.

b. Debt Avoidance and Fiscal Control

For this analysis, obtain a random sampling of payments for subsistence allowance, vouchers and purchase cards. The analysis on the use of purchase cards may include the reviews conducted by the Management Quality Assurance Service (MQAS) and the VREO. This analysis should also include sampling for authorization of Revolving Fund Loans (RFL) and program costs.

The data for this analysis may be obtained through the recommended sampling procedure for active cases in RTE status within the SAO period.

1. Authorization of Subsistence Allowance

Accurate authorization and timely reduction or termination of a Veteran's subsistence allowance award minimize, if not eliminate, establishment of debts and avoidance of hardship to the Veteran. To determine occurrences of overpayments, a random sampling of subsistence allowance awards may be selected and an initial check of the BDN M01 screen may be made using the Master Inquiry (MINQ) command. An analysis of circumstances contributing to an overpayment can determine if a problem exists with certain Veterans, case managers, facilities, or employees processing the awards.

In analyzing authorization of subsistence awards, answer at least the questions in the following categories:

(a) Hardship Avoidance

- Are initial or extended awards processed accurately and timely so that Veterans avoid hardships that might cause an advance from the Revolving Fund or delay entrance or reentrance into training?
- If delays occur, are there measures taken to avoid its recurrence?

(b) Timeliness of Reductions and Terminations

- Are awards initiated timely to reduce or terminate payments?
- Are school certifications or changes in training status generated or received from trainers or facilities in a timely manner?
- Do award authorization dates coincide with approved course or semester beginning and ending dates as published by the training facilities?

## (c) Dependents in Subsistence Allowance

- Are dependents added to or removed from a Veteran's subsistence allowance as soon as notification has been received?
- Are benefits being paid at rates consistent with the number of established dependents?

## (d) Recoupment

- In the case of overpayments or other debts, are recoupment actions taken accurately and timely?
- Are mitigating circumstances thoroughly developed and applied correctly?
- Are six credit-hour exclusions applied properly?

## (e) Administrative errors

An administrative error is established when the decision is revised after a redetermination is made on grounds of clear and unmistakable error.

All determinations for administrative error must be tracked manually and reviewed within the SAO period.

- How are administrative errors identified?
- What is the total number of administrative errors within the SAO period?
- Are appropriate actions documented clearly and taken immediately to correct the error?

## 2. Authorization and Control of Program Costs

Regular reviews must be conducted on the level of limits and approval authority for program costs on a yearly basis or a less-than-six-months basis. Relative costs of rehabilitation programs at different facilities are a factor in reviewing course and program approval under certain conditions.

Purchase card use by case managers must be regularly monitored and ensure that purchase authorities are consistently followed. When vouchers are received from facilities, the case manager must review and

certify the vouchers correctly and timely to the Finance activity auditor for payment.

In analyzing this area, answer at least the questions in the following categories:

(a) Program Authorization Level

- For high-cost training facilities, is reasonable justification for the Veteran's program cost developed and documented clearly?
- Is the required approval by the VREO or RO Director documented on the left section of the Veteran's CER folder?

(b) Revolving Fund Loans (RFL)

- Are advances from the RFL appropriately granted and the justification properly documented in CWINRS or the Veteran's CER folder?
- Are the authorization levels and procedures followed?
- For recurring requests for RFLs, are provisions made, such as financial counseling, to resolve the Veteran's chronic financial problems?
- Is the request for VREO's approval for RFL exceeding \$200 clearly documented?

(c) Voucher Certifications

- Are vouchers date stamped upon receipt?
- Are the vouchers certified timely for payment?
- Are the costs accurate, reasonable, and customary for similar goods and services?

(d) Use of Purchase Cards

- Are all guidelines for use of purchase cards followed correctly?
- Are established limits for purchases followed accurately?
- Does the authorizing official sign off on the statement and closely monitor the purchases?

- Are justifications for substantial purchases clearly documented?
- Are audits regularly conducted on purchase cards use?
- Have purchase cards been used incorrectly? If yes, what is the percentage of incorrect use of purchase cards?
- Is there a pattern of incorrect use of purchase cards? If yes, identify the pattern.

(e) Updating CWINRS

A case manager must obligate the funds in CWINRS prior to authorizing any payments.

In analyzing the use of CWINRS, answer at least the following questions:

- Are payments obligated prior to authorizing payments?
- Are payments authorized accurately and timely in CWINRS?
- Have payments been made in error? If yes, what is the percentage of payment errors?
- Is there a pattern of payment errors? If yes, identify the pattern.

3. Contracting Activities

The VR&E Officer has the responsibility for ensuring that the office is compliant with the requirements and guidelines for contracting activities. The employee responsible for the office's contracting activities must conduct an annual review of these activities using an SAO. Refer to Appendix BI for Guidelines for Conducting SAO on VR&E Contracting Activities. This SAO must be submitted to the VREO for review. Consequently, the results of the SAO are included in this chapter.

Based on the results of the analysis of the contracting activities, answer at least the following questions:

- (a) Are procedures and guidelines for contract agreements, disbursement, and adherence to the contracting guidelines for the VetSuccess contracts appropriately followed?

(b) Are there local procurements of contractual services for vocational rehabilitation services when the contracting requirement does not exceed \$25,000 annually or for services? If the response is Yes, answer the following:

- What services are used for the local contracting?
- Are the local contracting activities in compliance with the existing procedures and guidelines?
- Are contract payments made timely and accurately?

(c) Have significant deficiencies been identified in the SAO for Contracting activities? If the response is Yes, identify the deficiencies.

(d) What are the corrective actions taken to rectify the identified deficiencies?

c. Staff and Office Management

1. Position Descriptions and Performance Standards

Each staff member in the Division must have an accurate and current position description. The VR&E office and the Office of Human Resources (HR) at the RO must keep a copy of these descriptions. The performance standards for staff members follow directly from these position descriptions. There must be a mid-term performance rating and final performance review for each employee.

In analyzing this area, answer at least the questions in the following categories:

(a) Changes to a Position Description

- Are there additions, deletions or modifications to any employee's job duties that would warrant adding to or rewriting the position description?

(b) Copies of Position Descriptions

- Does each employee have a copy of his/her position description?
- Do the VREO and HR maintain a copy of the position descriptions for each employee?

## (c) Performance Standards and Mid-term Ratings

- Does each employee have a copy of his/her performance standards?
- If more than halfway through the rating year, has the employee received a mid-term performance rating?
- Are the employees' rating provided timely?

## 2. Staff Qualifications, Development and Training

The provisions of 38 U.S.C. 3118 and 38 CFR 21.380 and 21.382 outline the qualifications and training required for VR&E staff members who provide rehabilitation services under Chapter 31.

In analyzing this area, answer at least the questions in the following categories:

## (a) Staff Training Plan

- Is a local training plan developed for the VR&E staff members?
- Are deficiencies identified from the VR&E site visit, STAR, MQAS and other audits included in the training plan?
- Are there recurrent patterns for the identified deficiencies?
- Is periodic analyses conducted to determine if training implementation is effective?
- Is a training plan developed and implemented for new staff members?
- Is the training plan on file in the office?
- Are Certified Rehabilitation Counselors' continuing education credit requests properly processed and approved?
- Do individual staff members attend, contribute to, and participate in training at an acceptable level?

## (b) Staff Member Qualifications

Review the qualifications of Vocational Rehabilitation Counselors (VRC), and Employment Coordinators (EC):

- Do VRCs hold graduate degrees in appropriate disciplines?
- Has an appropriate accrediting body in the rehabilitation field certified them?
- Are staff members engaged in graduate or other formal course work relevant to their work?

(c) Professional Organization Participation

- Do staff members actively participate in or serve as officers in professional organizations?

(d) Professional Resource Availability

- Does the VR&E office subscribe to periodicals and professional journals in the rehabilitation field?
- Is the collection of references, CDs, DVDs, or websites accessible, adequate and current?
- Is this collection used by the staff?

3. Staff Configuration and Strength

The numbers and type of staff members in the VR&E office must be sufficient to accomplish the mission in a timely manner with an acceptable level of quality and volume of work accomplished.

In analyzing this area, answer at least the questions in the following categories:

(a) Overall Staffing

- What are the allocated and on-duty configurations of staff members assigned to the VR&E office?

(b) Types of Staff Members

- Can the number and type of staff members accomplish the required work?

- Are the staff members provided with the necessary tools and equipment to accomplish their job?

(c) Geographic Distribution

- Are outbased offices located to optimize service to Veterans and their dependents?
- Should outbased locations be created, relocated, or eliminated?
- Are staff members in outbased sites sufficiently qualified and trained to administer Chapter 31 benefits?

For procedures on staffing, refer to M28R.II.A.3.

4. Resource Allocation and Use

There should be an annual plan to estimate, request, allocate, and control General Operating Expenses (GOE) funds. The VREO must establish and monitor these procedures.

In analyzing this area, answer at least the questions in the following categories:

(a) Funding and Expenditures

- Are sufficient funds requested in advance of the fiscal year?
- Is there a significant difference among the funds estimated, requested, and allocated?
- Has the RO needed to request supplemental funding during the current fiscal year?

(b) Funding Trends

- Are there observable trends in Fund Control Point (FCP) expenditures from quarter to quarter or from year to year?

(c) Expenditure Tracking

- Is there a tracking mechanism for VR&E office expenditures for items essential to the operation, but not within assigned FCP accounts?

d. Other Program Areas

1. Motivation and Outreach

The motivation and outreach efforts provide information to a potentially eligible beneficiary, i.e., Servicemember, Veteran, adult or child dependent, in acquiring sufficient understanding to make informed decisions in applying for vocational rehabilitation or other services.

Note: The number of applicants that result from motivation and outreach efforts is not, in and of itself, the sole measure of success.

In analyzing this area, answer at least the following questions:

- (a) Does the Veterans Service Center (VSC) continually send Chapter 31 motivation information and VAF 28-1900 to potentially eligible beneficiary when processing compensation awards?

This analysis includes a review of VSC's compliance with required procedures for providing initial motivation materials when authorizing SC disability compensation awards and establishing CC 810 in BDN. It also examines the effectiveness of the office's motivation and outreach activities, and whether the type of motivation contact by VR&E is appropriate. This analysis focuses on the office's efforts to motivate Seriously Ill (SI) or Very Seriously Ill or injured (VSI) Veteran in applying for vocational rehabilitation benefits.

The review includes the office's procedures in routinely checking the VETSNET Operational Reports (VOR) for CC 810. The pending CC 810 is cleared when a completed VAF 28-1900 has been received from the Veteran. If an application has not been received from the Seriously Ill (SI) or Very Seriously Ill or injured (VSI) Veteran within 30 days, a contact must be established with the SI or VSI Veteran and CC 810 will be cleared in SHARE.

- (b) Are face-to-face contacts made with Servicemembers or Veterans who are apparently in greater need of services such as Veterans who are totally and permanently disabled and Servicemembers hospitalized pending discharge as a result of their disability?

The rationale for the personal contact is a Servicemember or a Veteran who is hospitalized awaiting discharge as a result of their disability(ies) or severely disabled, may not actually believe he/she can benefit from

rehabilitation services or may not be able to travel to the initial evaluation site. Thus, the Servicemember or Veteran may not respond to a letter, but may require personal contact to include home visits. Staff members with responsibility for motivations must capture the data necessary to examine these possibilities.

- (c) How effective are motivation and outreach efforts in getting formal applications from contacted claimants?

To assess this question, it is necessary to maintain a record and monitor the issue for a specific period, e.g., monthly or quarterly, to match up pre-coded VAF 28-1900 that are received from TAP or in pre-addressed and pre-coded envelopes from the VR&E office. VA Central Office may identify other targeted groups from time to time and specify the analysis and reporting required.

## 2. Other Program Benefits

- (a) Chapter 18 – Benefits for Children of Vietnam Veterans born with Spina Bifida

Chapter 18 provides a comprehensive evaluation for independent living, educational or vocational training and employment services. These services are provided for children of Vietnam Veterans born with spina bifida, or children of female Vietnam Veterans born with certain birth defects that resulted in a permanent physical, cognitive or psychological disorder, or children born with spina bifida to Veterans exposed to herbicides who served in or near the Demilitarized Zone (DMZ) in Korea.

Analysis must be conducted on all Chapter 18 cases within the SAO period.

- Is the VRP consulted when determining the types of services to be provided for Chapter 18 participants?
- Are required documentation for evaluation and authorization of services properly completed and filed in the Chapter 18 CER folders?
- Does the IWRP outline the appropriate services based on the identified needs of the participant?

- Are services provided to the participants correctly and timely?

(b) Chapter 35 – Survivors’ and Dependents’ Educational Assistance

Chapter 35 services provide educational assistance to Veterans’ dependents, spouses, and surviving spouses. In addition, VR&E provides assistance to eligible participants through Special Restorative Training (SRT) and Specialized Vocational Training (SVT).

Analysis must be conducted on all Chapter 35 cases within the SAO period.

In analyzing this area, answer at least the questions in the following categories:

- What is the total number of participants receiving Chapter 35 services within the SAO period?
- Is the VRP consulted when determining the need for and feasibility for SRT, SVT, or special assistance services?
- Are services provided to the participants correctly and timely?
- What is the percentage of participants receiving SRT services in proportion to all the Chapter 35 participants?
- What is the percentage of participants receiving SVT services in proportion to all the Chapter 35 participants?

(c) Chapter 36 – Educational Assistance Program

Chapter 36 services provide adjustment, educational and career counseling to Servicemembers, Veterans and their dependents to assist in determining their vocational goals.

The data for this analysis may be obtained through the recommended sampling procedure for Chapter 36 cases that were active or processed within the SAO period.

In analyzing this area, answer at least the questions in the following categories:

- How many applications were received for Chapter 36 within the SAO period?

- What is the percentage of cases that were closed with counseling in relation to the total number of applications received?
- What is the percentage of cases that were closed without counseling in relation to the total number of applications received?
- What is the percentage of cases that resulted to Chapter 31 initial evaluation in relation with the total number of cases closed with counseling?
- Are documentations for the vocational and educational assessments and results incorporated and considered in the Chapter 31 evaluation?

### 3. Activities of the Vocational Rehabilitation Panel (VRP)

The VRP is established to assist in developing rehabilitation programs for Veterans and their dependents with serious disability conditions. All records of deliberations and recommendations of the VRP must be maintained in a systematic way. In cases with infeasibility determination, follow-up plans must be established when necessary and services must be recommended to enhance the Veteran's potential to benefit from rehabilitation services.

Each office must have established a local mechanism to track the cases submitted to the Panel. Analysis must be conducted on all cases submitted within the SAO period.

In analyzing this area, answer at least the questions in the following categories:

- Is VRP membership properly constituted?
- Does the VRP meet regularly?
- Is attendance consistent among Panel members?
- Is there a pattern of referrals by case managers, by type of disability, or other factors?
- Is this pattern logical and reasonable?
- Are appropriate follow-up plans established?

- Are there recommendations from the Panel that are not accepted by the case managers?
  - If the response is Yes, are those recommendations thoroughly considered and documented?
  - From the date of the decision to make a VRP referral, what is the length of time until the deliberation?
  - From the date of the deliberation, what is the length of time until the VRC informs the Veteran of the outcome?
  - Does the Veteran receive a clear explanation of the recommendation for which the VRP was consulted?
4. Administrative Reviews, Advisory Opinions, Appeals and Equitable Relief

Several processes are in place to assist in resolving a Veteran or Servicemember's disagreement with the decision made on his/her claim for Chapter 31 benefits. The VR&E Officer must ensure that the Veterans and Servicemembers are informed of their appellate rights and responsibilities and those disagreements are resolved expeditiously.

Requests for administrative reviews, advisory opinions, appeals and equitable relief are made intermittently. Each office must have established a local mechanism to track these requests and to ensure responses are made timely. Analysis must be conducted on all requests within the SAO period.

In analyzing this area, answer at least the questions in the following categories:

- What is the total number of requests made within the SAO period?
- What is the percentage for each of the requests (administrative reviews, advisory opinions, local and VBA appeals) in relation to the total number of requests?
- Are the Veterans and Servicemembers notified immediately with the final decision on their requests in writing?
- If there are delays in providing responses, what are the factors that may be attributed to the delays?

- Is there a general pattern for the reasons of disagreements? If yes, identify the pattern.
- Do the disagreements pertain to a specific case manager's decision or are they random for all case managers?
- If a resolution of the disagreement results to an overturning of the original decision, are corrective actions made properly and timely?
- What is the percentage of overturned decisions in relation to the total number of cases submitted to VR&E Service's review?
- Is equitable relief granted within the SAO period? If the response is Yes, how many equitable reliefs are granted?
- Is the equitable relief provided properly and timely?