

July 14, 2021

Department of Veterans Affairs  
810 Vermont Ave., NW  
Washington, DC 20420  
*Via electronic submission*

Re: Agency Information Collection Activity Under OMB Review: Veteran Readiness and Employment Questionnaire, OMB Control No. 2900-0092

Dear Sir/Madam:

Thank you for the opportunity to comment on the Department of Veterans Affairs' (VA) collection of the Veteran Readiness and Employment (VR&E) questionnaire, VA Form 28-1902w. We at Veterans Education Success believe the VR&E program is a vital resource for veterans with service-connected disabilities looking to better their lives and find meaningful employment. We urge the VA to ensure the VR&E program functions as intended and that all veterans enrolled are fully supported.

VA Form 28-1902w is used by Vocational Rehabilitation Counselors (VRC) to determine entitlement during the initial VR&E evaluation process. Question 15 addresses the applicant's civilian employment history while questions 20-24 discuss education and training. We strongly urge VA to factor whether the veteran has a prior degree or current job into the totality of their application and not use it as a reason to deny them outright. We have seen veterans denied simply because they already have an undergraduate degree or a job with no path for advancement when they could have greatly benefited from the program.

Questions 12 and 13 on VA Form 28-1902w are germane to determining whether VR&E is right for the veteran. Yet, the response area does not allow for a detailed explanation. Further, the form is cumbersome; in order to increase the effectiveness of this collection of information, we suggest the form be consolidated and streamlined.

To ensure the information collected from VA Form 28-1902w is used appropriately, improvements to the overall administration of the VR&E program are necessary.<sup>1</sup> VRC counselors are crucial to the success of veterans, and we applaud the VA's efforts to reduce the number of veteran clients per counselor to 125. Further reducing the client-to-counselor ratio to around 85 would help give counselors a more manageable workload and veterans more attention.

Similarly, we recommend increased training for all counselors that incorporates comprehensive information on all five tracks in the VR&E program, consistent information on expectations, and requirements for quality to help improve veteran outcomes. We continue to hear from veterans whose VRC counselors try to steer the veteran away from high-quality institutions and towards low-quality, online colleges. That direction limits a veteran's potential to receive greater on-campus resources geared toward improving employment opportunities and addressing disability concerns that many online campuses cannot provide.

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<sup>1</sup> For a more detailed discussion of our suggestions on improving the VR&E program, see Veterans Education Success Statement for the Record, "Evaluating the Effectiveness of VA Vocational Rehabilitation and Employment Programs," June 4, 2019, available at <https://vetsedsuccess.org/our-testimony-house-veterans-sub-committee-on-evaluating-the-effectiveness-of-va-vocational-rehabilitation-employment-programs/>.

Continuing to modernize the case management system is important so that payments to student veterans are not delayed. Given the economic distress caused by COVID-19 and the dire financial situation many veterans face, the timeliness of payments are critical.

Finally, we offer the following suggestions to improve the VR&E process:

- VA should establish guidelines to improve veteran and counselor interaction, such as that counselors should respond to emails and phone calls from veterans within 48 hours.
- Enhance the transparency of the program, as no information is currently available on the GI Bill Comparison Tool.
- Establish a complaint process for veteran clients and access to VRC supervisors in appropriate circumstances.
- Ensure conflicts of interest between counselors and institutions are dutifully monitored.<sup>2</sup>

The collection of VA Form 28-1902w is necessary to comprehensively understand the rehabilitation needs of veterans applying for the VR&E program. We believe the collection of this information would be greatly strengthened by VA adopting these suggestions. We encourage VA to share any changes to the form based on public comments with relevant stakeholders before implementation.

Sincerely,



William Hubbard  
Vice President for Veterans & Military Policy



James Haynes  
Federal Policy Manager

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<sup>2</sup> See U.S. Department of Justice Press Release, "Department of Veterans Affairs Officials Pleads Guilty to Bribery, Fraud, and Obstruction in \$2 Million Scheme Involving Program for Disabled Military Veterans," Oct. 26, 2018, available at <https://www.justice.gov/opa/pr/department-veterans-affairs-official-pleads-guilty-bribery-fraud-and-obstruction-2-million>.