



May 17, 2021

Grant Officer Memorandum 03-21

FOR: JOBS FOR VETERANS STATE GRANT RECIPIENTS
ALL VETERANS' EMPLOYMENT AND TRAINING SERVICE STAFF

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SUBJECT: Jobs for Veterans State Grants Audits

The Veterans' Employment and Training Service (VETS) audits Jobs for Veterans State Grant (JVSG)-funded staff roles and responsibilities on a triennial audit cycle. VETS paused the triennial JVSG audits in Fiscal Years (FY) 2020 and 2021. This memo is to notify JVSG recipients that the audit cycle will restart in FY 2022 and of additional elements that will be part of the audits. This will allow states time to develop strategies and implement policy.

OVERVIEW

In accordance with 38 United States Code (38 U.S.C. as amended) §4102(A)(b)(5) and §4102A(c), the Assistant Secretary for Veterans' Employment and Training (ASVET) provides grant funds available for use in each state to support Disabled Veterans' Outreach Program (DVOP) specialists, Local Veterans' Employment Representatives (LVER), and Consolidated DVOP/LVER Position (CP) staff to carry out the duties as prescribed in 38 U.S.C. §4103A and §4104. These funds are made available to the states through JVSG. The statute at 38 U.S.C. §4103A and §4104 further directs VETS to conduct regular audits to ensure that these JVSG-funded staff are only performing the specific duties as outlined in their respective chapters.

VETS is working to provide guidance to states regarding the FY 2022-2024 audit cycle to ensure compliance with the roles and responsibilities of JVSG-funded staff. This guidance will include the audit tool used by VETS staff to guide the audit process and generate an audit report.

As VETS staff develop audit schedules, they will coordinate with U.S. Department of Labor (DOL) Employment and Training Administration's (ETA) Federal Project Officers to minimize the impact on states.

JVSG AUDIT CYCLE IMPLEMENTATION

In the audit guidance currently under development, states are advised that the following will be included in the upcoming cycle:

1. Requirement to Provide Certain Information in Public Communications

Annual appropriations acts include a requirement for federal fund recipients to disclose certain information when issuing statements, press releases, requests for proposals, bid solicitations, and other documents describing projects or programs funded in whole or in part with federal money (commonly referred to as the “Stevens Amendment”). For FY 2021, the specific reference is [P.L. 116-94, Division A, Title V, Section 505](#), and the text may also be found in the grant terms and conditions under Administrative Requirements. It states that all non-federal entities receiving federal funds shall clearly state in these documents:

- a) The percentage of the total costs of the program or project which will be financed with federal money;
- b) The dollar amount of federal funds for the project or program; and
- c) The percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

A Government Accountability Office review ([GAO-19-282](#)) indicated that most federal agencies did not manage grantee compliance with the Stevens Amendment requirements. Accordingly, VETS will audit states’ compliance beginning with the upcoming audit cycle. Noncompliance with this requirement will result in an “area of concern” designation for this triennial cycle.

2. Case Management Measure

Per the JVSG Special Grant Provisions, DVOP specialists focus on providing individualized career services, which should be accomplished through the case management approach as taught by the National Veterans’ Training Institute (NVTI). The previous triennial audit cycle monitored compliance with only the following two elements of case management:

- a) A **comprehensive assessment** to determine realistic employment goals and identified barriers to achieving those goals; and
- b) A **documented plan of actions** and services designed to overcome the barriers that exist and achieve the employment goals identified.

Beginning in FY22, the following third element, as taught by NVTI, will be added to this audit:

- c) **Consistent Contact** – Regular, consistent contact between the DVOP/CP and the eligible participant, including meetings and updates, both pre- and post-employment. Consistent contact is based on the participant’s individual needs and situation per the written plan and case notes. This also includes any documented attempted contact.

Note that NVTI has traditionally referred to this element as “follow-up,” but VETS is transitioning to the term “consistent contact” to reflect that regular contact should occur both *before and after* the participant attains employment.

These new audit elements are consistent with VETS’ commitment to continually improve audit processes and procedures.

INQUIRIES

Questions regarding this guidance should be directed to the state’s Director for Veterans’ Employment and Training (DVET).