



November 20, 2023

Veterans Services Performance Audit – Status Report

Members of the Legislative Audit Committee:

Attached are the status reports from the Department of Military and Veterans Affairs (Department) and Colorado Board of Veterans Affairs (Board) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) public version of the *Veterans Services Performance Audit*. The OSA also issued a confidential version of the report that contained sensitive information and was discussed during executive session at the September 2022 Legislative Audit Committee (Committee) hearing. At the December 11, 2023, Committee hearing, we will discuss the status report for the public audit report and then, following the Committee's vote to go into executive session in accordance with Section 24-6-402(3)(a)(IV), C.R.S., we will distribute and discuss the status report for the confidential audit report, which provides details on the Department's implementation of the recommendations from the confidential report.

OSA Review of Documentation

As part of the status report process, we requested and received supporting documentation for each recommendation that the Department and Board reported as having been implemented or partially implemented. Specifically, we reviewed the following documentation:

- Veterans Service Officer (VSO) training program documentation, including the Division of Veterans Affairs' (Division's) policies and training plan that outline requirements for new VSO training and continuing education, and the database for tracking training completed by VSOs.
- The Division's policies and procedures for accrediting VSOs, and the Division's forms and database for collecting and tracking information about VSOs.
- The Division's policies and procedures established to improve data security measures.

- The Division's policies and procedures, forms, and proposed legislation for distributing county support appropriations and promoting uniform access to veterans services offered by VSOs.
- The policies established for the Division and the Board to improve the strategic direction and governance of veterans services.

Based on our review, the supporting documentation substantiates the Department's and Board's reported implementation status.

STATE OF COLORADO

DEPARTMENT OF MILITARY AND VETERANS AFFAIRS

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September 25, 2023

Kerri L. Hunter, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

Dear Auditor Hunter:

In response to your request, we have prepared the attached status report on the implementation status of audit recommendations contained in the Veterans Services Performance Audit. The report provides a brief explanation of the actions taken by the Division of Veterans Affairs to implement each recommendation.

We are confident that the Division of Veterans Affairs is better postured and prepared today to move forward in furthering prompt and efficient services to all Veterans across Colorado on a uniform basis as a result of this audit.

If you have any questions about this status report and the Division of Veterans Affairs efforts to implement the audit recommendations, please contact David Callahan at 720-951-2669 or david.callahan@dmva.state.co.us

Sincerely,

David Callahan

David Callahan
Director Colorado Division of Veterans Affairs

Audit Recommendation Status Report (Public Report)

Audit Name:	Veterans Services Performance Audit (Public Report)
Audit Number:	2170P
Agency:	Department of Military and Veterans Affairs, Division of Veterans Affairs
Date of Status Report:	September 25, 2023

Section I: Summary

Rec. Number	Response from Audit Report	Original Implementation Date	Current Implementation Status	Current Implementation Date
1A	Agree	February 2023	Implemented	July 2023
1B	Agree	March 2023	Implemented	July 2023
1C	Agree	March 2023	Implemented	July 2023
2A	Agree	March 2023	Implemented	July 2023
2B	Agree	March 2023	Implemented	July 2023
2C	Agree	March 2023	Implemented	July 2023
3A	Agree	December 2022	Implemented	July 2023
3B	Agree	January 2023	Implemented	July 2023
3C	Agree	November 2022	Implemented	July 2023
3D	Agree	March 2023	Implemented	July 2023
4A	Agree	March 2023	Partially Implemented	November 2023
4B	Agree	February 2023	Partially Implemented	November 2023
4C	Agree	February 2023	Partially Implemented	November 2023
4D	Agree	December 2022	Implemented	July 2023
4E	Agree	June 2023	Implemented	July 2023
5A	Agree	January 2023	Partially Implemented	July 2024
5B	Agree	January 2023	Partially Implemented	July 2024
5C	Agree	March 2023	Partially Implemented	July 2024
6A	Agree	December 2022	Partially Implemented	July 2024
6B	Agree	January 2023	Partially Implemented	July 2024
6C	Agree	June 2023	Implemented	July 2023
6D	Agree	February 2023	Implemented	July 2023
7A	Agree	June 2023	Implemented	July 2023
7B	Agree	April 2023	Implemented	July 2023

Section II: Narrative Detail

Recommendation 1A

The Division of Veterans Affairs (Division) should ensure that veterans service officers (VSOs) receive effective and timely training by establishing a written training program for certifying new VSOs that outlines the content that new VSO training should cover, the timeframe in which VSOs should be trained, who should provide training, who is required to complete the training, what training materials should be provided to the VSOs, and the Division's processes for certifying completion of the training, and then presenting the training program to the Colorado Board of Veterans Affairs for approval.

Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The training program is updated in the division's policies & procedures manual. Colorado Board of Veterans Affairs approved a training program for certifying new VSOs within 90 days of appointment. Regional VSOs are responsible for providing new VSOs with access to the training materials and assisting them in the completion of their 30-60-90-day training program. Regional VSOs are responsible for updating the VSO training database upon completion of the training. The Division training officer maintains the division training database and learning management system.

Recommendation 1B

The Division of Veterans Affairs (Division) should ensure that veterans service officers (VSOs) receive effective and timely training by implementing a continuing education training requirement for VSOs either in written policies, rules, or as a condition of its payments to counties.

Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	Continuing education training program mirrors National Association of County Veteran Service Officers program as referenced in the division's policies & procedures manual. 16-hours required annually to maintain certification. VSO's can receive up to 16 credits for Fall Conference attendance, 8 credits for Spring Training attendance and up to 16 credits throughout the year as offered during Wednesday Coffee meetings. Regional VSOs will record completion of continuing education units for their respective VSOs in the VSO database.

Recommendation 1C	
The Division of Veterans Affairs (Division) should ensure that veterans service officers (VSOs) receive effective and timely training by implementing written procedures and a standard mechanism, such as a database, for tracking VSOs' new and continuing training, including information such as the dates training is provided and completed, training content, and who provided the training.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	Division created and implemented a VSO database and learning management system to track training status of all VSOs. Training content and completion of training is managed by the Regional VSOs for their respective VSOs. Regional VSOs are responsible for ensuring the completion of the training within established guidelines.

Recommendation 2A	
The Division of Veterans Affairs (Division) should ensure that individuals applying for accreditation meet eligibility requirements by defining in written policies, procedures, and/or rules what qualifies veterans service officers (VSOs) and administrative staff as applicable for accreditation, including (1) how the Division will assess good character and reputation, measure the hours worked annually, and assess whether training requirements have been met, and (2) how and at what times the Division will obtain information on qualifications (e.g., from applicants directly when they apply for accreditation, from counties when they appoint or re-appoint a VSO, annually from information maintained in a Division training database, etc.).	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division's policies & procedures manual outlines the accreditation process and responsibilities. CVSOs and administrative staff must meet qualifications in accordance with CRS 28-5-802. Division assesses good character and reputation as evidenced by the character of discharge noted on the DD Form -214. In addition, County Manager/Administrator will seek advice from veteran service organizations regarding the qualifications of CVSO applicants. Hours worked annually by accredited CVSOs are collected monthly on the CDVA-26 form. Regional VSOs verify CVSO satisfactory completion of the training and update in the VSO training database upon completion. Appointment is good for two years.

Recommendation 2B	
The Division of Veterans Affairs (Division) should ensure that individuals applying for accreditation meet eligibility requirements by establishing in written policies, procedures, and/or rules to what extent it will take responsibility for VSOs or administrative staff who were accredited through another recognized organization to ensure they met and continue to meet the qualifications.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division's policies & procedures manual outlines the accreditation process and responsibilities. Regional VSOs shall assist CVSOs in obtaining Office of General Counsel (OGC) of the U.S. Department of Veterans Affairs accreditation within 180 days of appointment. The division will verify eligibility for accreditation and cross-accreditation per instructions provided on the VA Form 21 application for accreditation as a service organization representative. The division will submit VA Form 21 to VA OGC for approval and notify the VSO upon approval. The division will accept cross accreditation with the American Legion, Veterans of Foreign Wars, and Disabled American Veterans. In the event of termination of employment, DVA will submit revocation to OGC and update the VSO database to reflect the effective date of revocation.

Recommendation 2C	
The Division of Veterans Affairs (Division) should ensure that individuals applying for accreditation meet eligibility requirements by establishing written policies, procedures, and/or rules for recommending education and experience qualifications for county VSOs, as required by statute.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division's policies & procedures manual outlines the division recommendations for education and experience as being a bachelor's degree and two years of experience with a veterans' organization. These recommendations are outlined in Appendix B (County Veterans Service Officers Appointment Verification) and Appendix L (VSO Position Description).

Recommendation 3A	
The Division of Veterans Affairs should ensure that it reports accurate information as part of its SMART Government Act performance measure on accreditation by establishing a database for storing key information about state and county veterans service officers (VSOs) and any relevant administrative staff, including their appointment/employment dates, separation dates, number of hours worked annually, accreditation status, and accreditation effective and expiration dates.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division has created a VSO database that stores and maintains the following information on state and county VSOs and relevant administrative staff including: <ul style="list-style-type: none"> - Appointment/employment date - Separation date - Hours worked annually - Certification/accreditation status with effective and expiration dates

Recommendation 3B	
The Division of Veterans Affairs should ensure that it reports accurate information as part of its SMART Government Act performance measure on accreditation by establishing written policies, procedures, and/or rules for regularly collecting and updating the data maintained as part of Recommendation 3A.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	CDVA updates VSO accreditation status monthly and submits to DMVA as part of the Executive Director's monthly report to the Governor's office. Data is maintained and stored in an excel file maintained by the division's operations office as well as the VSO database. Accreditation status is monitored monthly through reconciling information provided by OGC. Process is documented in the division's policies & procedures manual.

Recommendation 3C	
The Division of Veterans Affairs should ensure that it reports accurate information as part of its SMART Government Act performance measure on accreditation by defining in writing the population of individuals who are included in the measure, including whether individuals accredited through other recognized organizations and non-VSO administrative staff will be included in the measure.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023

Status Update Narrative	The division operations office maintains records on any VSO accredited under Power of Attorney 39. Per key measure 1 of the Division's Fiscal Year 2024 Wildly Important Goal, only individuals working in the capacity of a Veterans service officer are included in the measure.
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Recommendation 3D	
The Division of Veterans Affairs should ensure that it reports accurate information as part of its SMART Government Act performance measure on accreditation by implementing a review process for ensuring the reported results are based on accurate and complete information.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	Division's policies & procedures manual updated to review and report Wildly Important Goal data no later than the 1st of each month to the DMVA strategic planner for inclusion in the Department's Monthly reports. Data is submitted by Regional VSOs and reviewed/submitted by the division's operations office.

Recommendation 4A	
The Division of Veterans Affairs (Division) should implement robust security measures to protect sensitive veteran data by implementing internal controls as recommended in the confidential report.	
Current Implementation Status	Partially Implemented
Current Implementation Date	November 2023
Status Update Narrative	<i>Government Auditing Standards allow for information that is considered sensitive in nature resulting in security concerns to be issued through "classified or limited use reports" because of the potential damage that could be caused by the misuse of this information. The State Auditor considers some specific and technical aspects of this recommendation to be sensitive in nature and not appropriate for public disclosure. Therefore, some of the details of this recommendation have been provided to the Legislative Audit Committee in a separate, confidential report.</i>

Recommendation 4B	
The Division of Veterans Affairs (Division) should implement robust security measures to protect sensitive veteran data by establishing and enforcing written policies and procedures for informing county staff of policies that apply to data security and acceptable use of State IT resources and ensuring county users' understanding and acceptance of acceptable use policies.	
Current Implementation Status	Partially Implemented

Current Implementation Date	November 2023
Status Update Narrative	All users of division IT resources and claims management systems shall acknowledge receipt and understanding of the acceptable use policy, rules of behavior and personal identifiable information protection requirements. The division's policies & procedures manual revised to reflect status of IT data security compliance and authorized access. This recommendation projected to be fully implemented upon internal audit of county user's understanding and acknowledgment of acceptable use policies.

Recommendation 4C	
The Division of Veterans Affairs (Division) should implement robust security measures to protect sensitive veteran data by implementing internal controls as recommended in the confidential report.	
Current Implementation Status	Partially Implemented
Current Implementation Date	November 2023
Status Update Narrative	<i>Government Auditing Standards allow for information that is considered sensitive in nature resulting in security concerns to be issued through "classified or limited use reports" because of the potential damage that could be caused by the misuse of this information. The State Auditor considers some specific and technical aspects of this recommendation to be sensitive in nature and not appropriate for public disclosure. Therefore, some of the details of this recommendation have been provided to the Legislative Audit Committee in a separate, confidential report.</i>

Recommendation 4D	
The Division of Veterans Affairs (Division) should implement robust security measures to protect sensitive veteran data by establishing and enforcing written policies and procedures for ensuring Division and county staff who handle sensitive data are trained in data security protocols. This should include defining the frequency of training the Division will provide, the information the training will cover; and requirements for Division and county staff to attend such training on an established schedule.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division's policies and procedures have been updated to define the annual receipt and acknowledgement of data security protocol. Data security training will also be provided during annual VSO training conferences, and Regional VSOs are required to audit County VSO offices for adherence to the security policies no less than annually.

Recommendation 4E	
The Division of Veterans Affairs (Division) should implement robust security measures to protect sensitive veteran data by establishing and enforcing written policies and procedures for adhering to requirements to involve the Office of Information Technology (OIT) in IT contracts and use OIT's standard vendor agreement.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	Division incorporates OIT and procurement staff in any actions that involve OIT. If we have an OIT purchase, confer with OIT. Written in data security section of the division's policies & procedures manual.

Recommendation 5A	
The Division of Veterans Affairs (Division) should ensure that it distributes county support appropriation funds to counties in a manner that aligns with the statutory intent to promote uniform access to services across the state by developing an annual or semiannual application form for counties to request state payments and implementing written policies, procedures, instructions, and/or rules that require submission of a complete application that provides the information necessary to comply with statutory requirements as a basis for counties to receive state payments. This should include clarifying requirements around the statutory provision that veterans service officers (VSOs) be a veteran and requiring counties to report this information on the application.	
Current Implementation Status	Partially Implemented
Current Implementation Date	July 2024
Status Update Narrative	Application (Appendix K) of division's policies & procedures manual provides directions to submit requests for state payments rendered to counties for CVSO services provided. Payments will only be processed for counties in compliance with qualification provisions outlined in CRS 28-5-802 and the division's policies & procedures manual. This recommendation is projected to be fully implemented pending C.R.S revisions that address hourly uniformity of payments and require certification and accreditation as a requirement for receiving state payments.

Recommendation 5B	
The Division of Veterans Affairs (Division) should ensure that it distributes county support appropriation funds to counties in a manner that aligns with the statutory intent to promote uniform access to services across the state by seeking legal advice on the extent of the Division's ability and responsibility to request information from counties about their use of state payments, and based on that legal advice, designing the application developed as part of Recommendation 5A to address statutory requirements.	

Current Implementation Status	Partially Implemented
Current Implementation Date	July 2024
Status Update Narrative	Application meets the provisions outlined in 28-5-707 as stated in the division's policies & procedures manual Appendix K (County Application for Semiannual Payment). AG office opined that DVA has the authority to request county use of funds received per CRS 28-5-707 which states that semiannual payments shall be made only on application by such county commissioners to the division, which application shall state and certify the amount such county commissioners have authorized to be disbursed for such purposes out of other money's in such county general fund for the period covered by the application. This recommendation is projected to be fully implemented pending C.R.S revisions that address hourly uniformity of payments and require certification and accreditation as a requirement for receiving state payments.

Recommendation 5C	
The Division of Veterans Affairs (Division) should ensure that it distributes county support appropriation funds to counties in a manner that aligns with the statutory intent to promote uniform access to services across the state by working with the Colorado Board of Veterans Affairs and other stakeholders, as needed, to evaluate how it distributes state payments to counties to determine if there are other options that would better promote uniformity of service statewide and ensure the Division is complying with statute, and implement any recommended changes. This should include considering options that (1) eliminate or reduce wide variations in the effective hourly rates provided for VSOs, which may include setting an hourly rate and adjusting payments when a VSO's full- or part-time employment status changes; (2) provide consistency in the amounts counties are paid for shared VSOs; (3) consider other factors that drive VSO costs, such as the veteran population in each county, to better use the county payments to promote uniform access to veterans services across the state; (4) consider other strategic factors such as the extent to which VSO accreditation should be a factor in the amount of financial support counties receive; and (5) whether there is a need for a required statewide case management system and how that system should be funded. The Division should pursue statutory changes as necessary to implement recommended changes.	
Current Implementation Status	Partially Implemented
Current Implementation Date	July 2024
Status Update Narrative	In a manner to address this disparity in payments and to promote uniformity of support payments for CVSO services provided across the state, the division has implemented an hourly pay rate in consultation with the Colorado Board of Veterans Affairs. The CDVA-26 Monthly Report (Appendix A) will be used to document monthly hours worked by CVSOs. Counties will submit a County VSO Payment

	<p>Application (Appendix K) semi-annually (January/July) in accordance with C.R.S 28-5-707. The hourly rate will be determined by dividing moneys appropriated by general assembly for CVSOs by total CVSO hours worked across the state. For example: \$1,340,381 (money's appropriated) / 133,120 (total CVSO hours worked across the state) = \$10.06 per hour. The hourly rate will fluctuate according to the money appropriated and total CVSO hours worked across the state. This recommendation is projected to be fully implemented pending C.R.S revisions that address hourly uniformity of payments and require certification and accreditation as a requirement for receiving state payments. There is a need for a required statewide case management system which is funded from the division's operational appropriation.</p>
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Recommendation 6A	
<p>The Division of Veterans Affairs (Division) should promote uniform access to the veterans services offered by veterans service officers (VSOs) by establishing a written interpretation in policies and/or rules of the statutory directive that the Division and the counties act to promote the provision of services to all veterans in the state on a uniform basis. This could include seeking legal guidance or statutory clarification, as needed.</p>	
Current Implementation Status	Partially Implemented
Current Implementation Date	July 2024
Status Update Narrative	<p>The division is in the process of expanding from five to six regional field offices which are projected to be fully operational by December 31, 2024. This additional office, coupled with additional county VSO allocations, will assist in reducing the Veteran to VSO ratio in our higher density populations. It is anticipated that additional state and county VSO resources will be needed to achieve the division's goal of reducing Veteran appointment wait times to two-weeks or less and responses to inquiries in two-business days or less. We are pleased to report that the division increased its capacity to serve our state's Veterans with our recent addition of a Woman VSO Coordinator who will be assisting and serving women and other underrepresented populations across the state. The division also has a dedicated training specialist to assist with the training and certification of County VSOs across the state and is in the recruitment process for a Claims & Benefits Supervisor, VSO Liaison, Appeals Assistant, and Grants Assistant. The division is additionally seeking statutory clarification related to the</p>

	distribution of county support appropriation funds and promoting uniform access to veteran services.
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Recommendation 6B

The Division of Veterans Affairs (Division) should promote uniform access to the veterans services offered by veterans service officers (VSOs) by (1) developing in writing targets and measures for the activities state and county VSOs should conduct to promote uniform services, (2) implementing methods to collect data related to those targets and measures, and (3) providing direction to counties on how to track and report the requested data. This could include revising the monthly county reports; enhancing VetraSpec, requiring its use, and specifying what types of data should be entered into the system; improving the customer experience survey; and/or creating other methods to capture information related to the targets and measures.

Current Implementation Status	Partially Implemented
Current Implementation Date	July 2024
Status Update Narrative	The division's policies & procedures manual defines prompt and efficient service to all Veterans across Colorado on a uniform basis as being no more than a two-week wait time for a veteran to meet with a VSO and no more than a two-business day delay in responding to inquiries. The CDVA-26 Monthly Report has been revised to collect data on hours worked, appointment wait times, and contacts with customers. The division has created a Wildly Important Goal of improving Veterans' satisfaction level 5% by June 30, 2024. A baseline has been established with follow-on surveys to be fielded in January and June of 2024. This recommendation is projected to be fully implemented with the completion of the follow-on surveys scheduled for January and July of 2024

Recommendation 6C

The Division of Veterans Affairs (Division) should promote uniform access to the veterans services offered by veterans service officers (VSOs) by establishing written policies, procedures, and/or rules requiring counties to report or enter data identified as part of Recommendation 6B, including how the data should be provided (e.g., in designated forms, through a case management system, etc.) and applicable deadlines or timelines (e.g., submitting forms by certain due dates or recording case data in a case management system within certain timeframes).

Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	Division's policies & procedures manual revised to instruct County VSOs how to report data via the County Veteran Service Officer Monthly Report (Appendix A); use of claims

	management system; recording case data; and associated timelines.
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Recommendation 6D

The Division of Veterans Affairs (Division) should promote uniform access to the veterans services offered by veterans service officers (VSOs) by establishing written procedures that involve regularly examining the collected data, identifying gaps in uniformity, identifying and collecting any additional needed data not collected through other processes, identifying any strategies and tools needed to better ensure uniform access to veterans services, and working with the Colorado Board of Veterans Affairs and other stakeholders as needed on any identified policy changes to improve or maintain uniformity.

Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division has established a dashboard for regularly collecting and examining data with respect to VSO accreditation, Veteran Benefit Management System access; veteran outreach, identifying and resolving gaps in service, and improving grant execution rates across the state to address uniformity of veteran services across the state. Monthly updates are provided to the department as part of its monthly report to the governor's office.

Recommendation 7A

The Division of Veterans Affairs (Division) should improve the strategic direction of its veterans services by developing a written strategic plan with goals, objectives, strategies, resource allocations, and processes related to all of the Division's key functions that addresses the recommendations in this report. This should include, or be supplemented by, a written plan for administering veterans services programs, and written policies and directives, as recommended throughout this report, and in accordance with statute.

Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	Division's strategic plan (Appendix M) of the policies & procedures manual addresses goals, objectives, strategies, and processes related to all the Division's key functions (accreditation, Veteran Benefit Management System access, outreach, identifying and resolving gaps in service, and improving grant execution). Resource allocation is reflected in the division's Organizational Structure (Appendix J)

Recommendation 7B

The Division of Veterans Affairs (Division) should improve the strategic direction of its veterans services by developing written procedures for updating the Division's strategic plan to

address any changes identified through the Colorado Board of Veterans Affairs' (Board) studies of programs and veterans' needs and the compilation of the Board's annual report.	
Current Implementation Status	Implemented
Current Implementation Date	July 2023
Status Update Narrative	The division's policies & procedures manual addresses the divisions process for updating its strategic plan on an annual basis to include any changes identified through the Colorado Board of Veterans Affairs studies of programs and veterans' needs.

STATE OF COLORADO
COLORADO BOARD OF VETERANS AFFAIRS
DEPARTMENT OF MILITARY AND VETERANS AFFAIRS

Members

Sheila Scanlon, Chair
Sean Maday, Vice Chair
Lacey Golonka, Secretary
Longinos Gonzalez
Fred Korb
Jasmine Motupalli
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Division of Veterans Affairs

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September 29, 2023

Kerri L. Hunter, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

Dear Auditor Hunter:

In response to your request, we have prepared the attached status report on the implementation status of audit recommendations contained in the Veterans Services Performance Audit. The report and attachments provide a brief explanation of the actions taken by the Colorado Board of Veterans Affairs to implement each recommendation.

If you have any questions about this status report and the Colorado Board of Veterans Affairs' efforts to implement the audit recommendations, please contact Sheila Scanlon, Chair, at 303-819-6107 or scanlonsmq@comcast.net.

Sincerely,

A handwritten signature in blue ink that reads "S M Scanlon".

Sheila Scanlon
Chairman, Colorado Board of Veterans Affairs

Audit Recommendation Status Report

Audit Name:	Veterans Services
Audit Number:	2170P
Agency:	Colorado Board of Veterans Affairs
Date of Status Report:	September 29, 2023

Section I: Summary

Rec. Number	Response from Audit Report	Original Implementation Date	Current Implementation Status	Current Implementation Date
8A	Agree	December 2023	Partially Implemented	December 2024
8B	Agree	December 2023	Partially Implemented	December 2024
8C	Agree	December 2023	Partially Implemented	December 2024

Section II: Narrative Detail

Recommendation 8A

The Colorado Board of Veterans Affairs (Board) should improve its governance over veterans services by establishing and implementing written policies and procedures for the content and design of the annual reports, including which veterans programs to report on, what types of information all programs should provide, and adding a designated section for the Board's overall conclusions on the status of the programs and any recommended changes in programs, policies, rules, or statute.

Current Implementation Status Partially implemented

Current Implementation Date December 2024

Status Update Narrative

The letter for information for this year's annual report was revised and sent out in June 2023. We are reviewing last year's annual report and are currently reviewing what needs to be included from these yearly department reports in this year's 2023 Annual Report. We plan on the June 2024 Chair's letter to the different state departments to request more specific information on the work these departments are doing on behalf of veterans. We have also asked the DMVA to support an in-person meeting with representatives from these departments, at least once a year, so that all departments within the State know what the other departments are doing for veterans. Hence, we have an implementation date of 12/31/24 when the yearly Colorado Board of Veterans Affairs (CBVA) Annual Report is due. In addition to the above, we are annotating statewide issues at each monthly meeting. The Division of Veteran Affairs has published a Policies and Procedures Manual/Standard Operating Procedure (SOP) that includes what the CBVA does. This

	document will be republished in the new year. The CBVA is revising what has been written in the SOP to more specifically cover board policy and procedures including the Veterans Assistance Grant and Veterans Trust Fund Grants. The board will use both the By-laws, in revision right now, and the SOP to cover written policy and procedures for the board.
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Recommendation 8B

The Colorado Board of Veterans Affairs (Board) should improve its governance over veterans services by establishing and implementing written policies and procedures for using the information collected and compiled for the annual report to identify recommended changes in policy, procedure, or law. For example, the Board could consider the need for any policy recommendations or Board action related to background requirements of veterans service officers (VSOs) and equitable payments to counties for VSO services, as discussed in the report.

Current Implementation Status	Partially implemented
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Current Implementation Date	December 2024
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Status Update Narrative	Board approved the DVA's 30/60/90 training plan for VSOs. The board has asked the DVA to brief the board in the 2024 new year on the 30/60/90 day training plan for updates and board recommended changes. The Board's duties are now listed in the DVA SOP Policies and Procedures Manual. The Board has approved equitable payment to counties for VSO services at the Oct 2023 monthly board meeting. The board has asked the DMVA for a legal opinion on whether by statute Assistant Veteran Service Officers must be veterans. The board will include in the 2023 Annual Report legislative recommendations to support veterans statewide. However, that being said, the board is still working on implementing more specific policies and procedures for the information collected and compiled during the year for the annual report and does not believe it will have this to the board's satisfaction until the 2024 CBVA Annual Report. The board is made up of volunteers and only meets once a month 11 months out of the year. This will take a lot of the board's time to identify actionable recommended changes in policy, procedures, or law.
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Recommendation 8C

The Colorado Board of Veterans Affairs (Board) should improve its governance over veterans services by establishing and implementing written policies and procedures for bringing any recommended policy changes identified to the attention of the Division of Veterans Affairs and/or the General Assembly, as needed.

Current Implementation Status	Partially implemented
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Current Implementation Date	December 2024
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Status Update Narrative	This is in progress and discussed at each board meeting. Because the board is made up of volunteer veterans with full-time jobs,
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	<p>and only meets once a month for 11 out of 12 months per year, we are finding that it takes us time to refine our policy and procedures in the written form. We now are part of the DVA's SOP and want to refine it even more by February 2024 to be more specific on board. We are in the midst of rewriting our Strategic Plan and hope that we will vote on the final version at our December 2023 meeting. The By-laws subcommittee is meeting in November 2023 and hopes the board will agree to the revised by-laws at the December 2023 meeting but will need a legal review before they can be voted on as approved. The board has asked the DMVA to facilitate a meeting with the state departments that support veterans in the first six months of 2024 in order that they all know what each department is doing to support veterans and so the board can advise them on how they might increase their support. The board will also work on revising the letter sent to the five state departments, requesting their yearly support to veterans, being more specific on what the board would like to see in their annual response, for inclusion in the Annual Report. This all takes time, and the board feels that we will not be able to fully implement the audits recommendations until our 2024 Annual Report.</p>
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