

**COMPILED RESPONSES TO
ADMINISTRATIVE POLICY:
JVSG STAFFING REQUIREMENTS**

Policy Section	Issue(s)	Submitted by (Name/LWDB)	Policy Language Change	DEO Response	Authority
IV. C	Even in an employer's market, we've had trouble recruiting appropriate staff. 60 days is very ambitious. At least 90 days seems more realistic for a small region with no military installations and limited population	Diane Head, LWDB 6	Yes	The 60-day requirement is tied to quarterly federal reporting requirements attached to the JVSG grant. However, DEO recognizes the challenges of recruiting qualified veteran candidates. The policy language has been updated.	Title 38 U.S.C. 4103, 4104 Veteran Program Letter (VPL) 03-19
IV. C	How would we know of unforeseen delays 20 days prior to the position being vacant? In some cases, I wouldn't even know about the vacancy prior to the vacancy occurring.		No	The section states "within 20 days of the position becoming vacant" meaning, 20 days following the position becoming vacant. This does not mean prior to the vacancy occurring.	N/A
N/A	General Question - Request clear guidance and direction be provided to areas with a consolidated position(s) regarding how to properly provide and document services to ensure effective service delivery while avoiding compliance errors.	Donna Doubleday, LWDB 19	No	DEO will provide detailed guidance and technical assistance to any LWDB selected for Consolidated Positions prior to their deployment.	N/A
IV. C	At the LOCAL level we have no problem posting and filling the positions within 60 days, however we have encountered serious delays with DEO approving the veteran positions. In 6 years	Julia Dattolo, LWDB 21	Yes	The policy language has been updated.	Title 38 U.S.C. 4103, 4104 Veteran Program Letter (VPL) 03-19

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<p>of being at CS Palm Beach County, as the former manager of the Veteran unit, COO and now CEO, we resorted to using our own dollars bringing on the DVOPS or LVER via a temp staffing agency, (put them through orientation as a generic career counselor or business services representative) while waiting for background checks and approval of package submissions. We fill these positions as ‘temp’ so we have continuity in the Veterans unit and the Veteran staff hits the ground running the day they get approved by DEO. We consider this a best practice.</p> <p>However, once the package is submitted to the state, we notoriously have to track down their paperwork, see who’s desk it’s on, ask for it to be signed and forwarded and in some cases find that the paperwork was lost and we have to resubmit or we have to write a justification for pay or another justification for something else. Understanding the</p>				
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	background checks can take a few weeks to return, the total time we usually wait for an application package to be approved has been anywhere from a 3-4-month evolution.				
N/A	General Question - It is our understanding that if a suitable qualified veteran cannot be found, LWDBs can fill the positions with eligible spouses or non-veterans. Is this correct?	Kimberly Bryant, LWDB 22	No	The LWDB must make every effort to hire a qualified veteran, and in the case of DVOPs, give preference to disabled veterans. If a LWDB were to hire a non-veteran into a JVSG-funded position, the LWDB would be responsible for continuing to post the vacancy to fill the position with a qualified veteran; therefore, this action is not recommended. If a LWDB is not able to find a qualified veteran during the initial screening, it is recommended they contact the State Veterans' Program Coordinator (SVPC) for technical assistance.	Title 38 U.S.C. 4103, 4104 Veteran Program Letter (VPL) 03-19
IV. C	<ol style="list-style-type: none"> 1. At the 20-day mark how will LWDB's know if there are unforeseen circumstances that may delay the filling of the position within sixty days? 2. How would you like this information reported? 3. Would an email suffice or is DEO developing a template for this purpose? 		Yes	<ol style="list-style-type: none"> 1. The LWDB should be able to determine, halfway through the allotted time for hiring, whether they will be able to meet the 50-day requirement. 2. The policy language has been updated. 3. The policy language has been updated. 	N/A

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N/A	<p>General Question</p> <ol style="list-style-type: none"> 1. What is the formula for determining the pass-through amount? 2. Will DEO assign a total pass-through allocation, or will they continue to do it at different intervals? (Receiving the allocations separately makes it difficult to determine how much to budget.) 		No	<ol style="list-style-type: none"> 1. The formula for determining pass through is based on a percentage of the LWDB's JVSG-funded staff salary levels. The percentage used is negotiated with USDOL as part of the grant agreement and therefore may change year over year. 2. JVSG pass through is provided based on filled positions, therefore it must be issued in intervals to ensure pass through funding is not provided for vacant positions. LWDBs requesting technical assistance for JVSG budgets may submit a request to the SVPC at VETS@deo.myflorida.com. 	<p>Title 38 U.S.C. 4103, 4104</p> <p>JVSG Terms and Conditions</p>
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