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## Chapter 1 PROGRAM OVERSIGHT OVERVIEW

### 1.01 Introduction

This chapter outlines the principles, procedures and criteria for implementing Vocational Rehabilitation and Employment (VR&E) program oversight. Oversight activities are conducted at both national and local levels. Effective control of VR&E activities is necessary to ensure the maximum level of quality in its program operations. This chapter provides the framework for achieving this control, as well as statutory and regulatory guidance.

### 1.02 References and Resources

Laws: Public Law 106-117, The Veterans Millennium Health Care and Benefits Act  
38 United States Code (U.S.C.) 3118  
38 U.S.C. 3697

Regulations: 38 Code of Federal Regulations (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  
38 CFR 21.412  
38 CFR 21.414  
38 CFR 21.420

### 1.03 Purpose and Scope

VR&E program oversight utilizes different methods to ensure that performance evaluation for each office is conducted consistently and that data are valid and reliable. Methodology and outcomes for the following oversight activities are detailed in specific chapters of M28R, Part VIII:

#### a. Quality Assurance (QA) Program

The QA program conducts Systematic Technical Accuracy Reviews (STAR) of quality of work by reviewing individual Counseling/Evaluation/Rehabilitation (CER) folders. The reviews are conducted at two levels.

1. National QA Reviews

The members of the STAR Team conduct case reviews of all Regional Offices (RO) on a monthly basis during each fiscal year. This team is comprised of VR&E Service staff members. STAR results are used to populate the accuracy scores counted towards the performance of the ROs. The results are communicated individually in a standard written format to each office and are also posted on the QA website.

2. Local QA Reviews

The VR&E Officer (VREO), or his/her designee, conducts case reviews of individual VR&E offices. The reviews are conducted on a monthly basis. The results of the local reviews are used to evaluate the performance of individual case managers and identify actions needed to improve the quality of work. The STAR Team is responsible for the administration and oversight of these reviews.

See M28R, Part VIII, Section A, Chapter 2 for additional information on the QA Program.

- b. Site Visit Program

The STAR Team conducts this activity by visiting individual ROs and reviewing their program operations and interviewing staff members. Results of the site visits are communicated in a standard written format and through a management briefing following the completed survey.

See M28R, Part VIII, Section A, Chapter 3 for additional information on the Site Visit Program.

- c. Workload Management Program

Each VR&E office implements this program by developing a Workload Management Plan (WMP) annually. The WMP assesses an office's overall performance in program operations and quality of services. It assists the VREO in identifying strengths and weaknesses in processes, and in developing specific strategy to correct any identified deficiency. Results of this activity are presented in a standard written report that is submitted to the RO Director. The STAR Team reviews this report during the site visit.

See M28R, Part VIII, Section A, Chapter 4 for additional information on the Workload Management Program.

d. Systematic Analysis of Operations

Each VR&E office conducts this activity annually by using a Systematic Analysis of Operations (SAO) that pertains specifically to each critical element of the Chapter 31 Program. These critical elements include, but are not limited to, the following:

- Chapter 31 - Vocational Rehabilitation
- Debt Avoidance and Fiscal Control
- Staff and Office Management
- Other Program Areas

Results of this activity are presented in a standard written SAO report that is submitted to the RO Director. The STAR Team reviews this report during the site visit.

While the SAO is divided into four major elements, the VR&E Officer has the option to conduct analyses into smaller sections according to the office's needs. Similarly, frequency of SAO reporting is not limited to once a year. The VR&E Officer may opt to conduct more frequent systematic analyses as necessary to resolve identified problems or areas of concern.

See M28R, Part VIII, Section A, Chapter 5 for additional information on the SAO Program.

1.04 Supervisory Responsibilities

a. Division Management

The VREO is responsible for assessment of quality and management control within his/her division.

b. Delegation

The VREO may delegate the task of quality reviews that is consistent with the division and Regional Office (RO) policy.

c. Quality Control Responsibilities

The VREO, Assistant VREO, or designated supervisor(s) are expected to:

1. Identify the quality of work performed within their area of responsibility at all times.
2. Report reliable information on levels of and reasons for established performance to higher-level management.
3. Determine corrective actions to resolve poor performance.

1.05 Performance Improvement

a. Corrective Actions

The VREO must review all outcomes or results for each of the oversight activities.

- The VREO must ensure that all deficiencies identified by his/her submitted reports and analyses are sufficiently addressed with specific actions to resolve the deficiencies.
- The VREO must ensure that all corrective actions are identified through the QA reviews and site visits are completed within the required timeframe.

b. Supervision and Training

The VREO must conduct regular supervision and training to ensure effective quality control. The VREO should know the performance level of each employee assigned within his/her supervision.

When poor performance is identified, the VREO must address it with the employee through performance evaluation and/or provide the necessary training to ensure that all work performed meets the acceptable level of quality.