



**POLICY  
NUMBER 112**

<b>Title:</b>	Staffing Requirements
<b>Program:</b>	Jobs for Veterans' State Grant
<b>Effective:</b>	June 9, 2021

**I. PURPOSE AND SCOPE**

The purpose of this policy is to provide Local Workforce Development Boards (LWDBs) the minimum staffing requirements for staff supported by the Jobs for Veterans' State Grant (JVSG).

**II. BACKGROUND**

The JVSG is a federally-funded, formula-based staffing grant that supports the hiring of staff to provide individualized career and training-related services to veterans and eligible persons with Significant Barriers to Employment (SBE) and to assist employers in filling their workforce needs with job-seeking veterans and eligible spouses. Florida is currently the third largest recipient of JVSG funding in the nation.

As a condition to receive funding, the Florida Department of Economic Opportunity (DEO) must submit a grant application and state plan narrative to the U.S. Department of Labor Veterans' Employment and Training Service (DOL VETS) every three years. This plan includes, but is not limited to, a description of the populations of veterans that will receive targeted services, provisions for priority of service for veterans, and performance goals. Each year thereafter, DEO must submit an Annual Funding Modification to the approved state plan to describe any adjustments to the plan narrative and affirm the total number of full-time positions that will be supported by the State's JVSG funding allocation.

**III. AUTHORITY**

[Title 20, Part 678](#)

[38 United States Code \(U.S.C.\), Chapter 41](#)

[Veterans Program Letter \(VPL\) 01-19](#)

[VPL 03-14](#)

[VPL 03-14, Change 1](#)

[VPL 03-14, Change 2](#)

#### IV. POLICIES AND PROCEDURES

Florida has established a fully integrated workforce services delivery system with DEO as the designated entity responsible for the administration of all workforce services programs, including the JVSG. The Department provides workforce services through Florida's 24 chartered LWDBs and their network of local CareerSource Career Centers.

JVSG-funded staff are fully integrated into the career center to form a comprehensive team that provides services to veterans that address their employment and training needs. LWDBs have assigned JVSG-funded staff allocated according to veteran population and the needs of the community. JVSG-funded staff are state merit staff, jointly managed by the LWDBs in accordance with current grantee-subgrantee agreements.

##### A. JVSG-Funded Staff

The JVSG supports the salary, benefits, and fair-share cost of staff positions employed under a merit personnel system. These staff are included among the comprehensive career center required partner staff, which consists of all staff employed by programs or activities operated by partners listed in [20 CFR 678.400](#).

The JVSG program, in and of itself, does not constitute the entirety of Florida's veterans' services. Rather, the program is a partner within Florida's workforce development system. The JVSG program fills a specific role in the career center delivery of services to specific veterans and other eligible persons. The JVSG program directly supports the following positions:

1. **Disabled Veteran Outreach Program (DVOP) Specialist:** DVOP specialists are jointly managed staff assigned to the LWDB to provide individualized career services to SBE veterans and other eligible individuals through the case management process in accordance with Title 38, U.S. Code and current Veteran Program Letters (VPLs). The LWDB must fill DVOP positions with eligible veterans and give preference to those with disabilities as defined in [Title 38, U.S.C. 4103A](#) with priority given to special disabled veterans and then disabled veterans.
2. **Local Veteran Employment Representative (LVER):** LVER staff are jointly managed staff assigned to the LWDB who actively advocate for employment and training opportunities with business, industry, and community-based organizations on behalf of veterans, consistent with Title 38, U.S. Code and current VPLs. LVER

positions are filled in accordance with [Title 38 U.S.C. 4104](#); with priority given to disabled veterans and then eligible veterans.

3. **Consolidated Position (DVOP/LVER):** A JVSG-funded staff person who performs both the duties of the DVOP Specialist and LVER. Consolidated DVOP/LVER positions must promote a more efficient administration of JVSG program services to employers and veterans, with an emphasis on veterans with disabilities.

## **B. Local Staffing Level Designations**

The JVSG program consists of, at minimum, both a LVER and DVOP specialist, or, a Consolidated Position (DVOP/LVER). The deliberate assignment of JVSG staffing levels to LWDBs is paramount to the success of the JVSG program. The proportion of DVOP and LVER staff, as well as the total number of JVSG-funded, full-time positions assigned to each LWDB, is determined by DEO through an analysis of veteran population using data compiled from the Department of Veterans Affairs National Center for Veteran Analysis and Statistics. The statewide, total number of JVSG-funded, full-time positions, by classification, is tracked and maintained by the State Veterans' Program Coordinator (SVPC) and submitted annually to USDOL VETS.

LWDBs may request a modification to the proportion of DVOP and LVER staff or the number of JVSG-funded positions in their local area by submitting a written justification for the requested changes to the SVPC at [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com). LWDBs are not authorized to eliminate or modify JVSG-funded positions without approval from DEO.

## **C. JVSG-Funded Position Vacancies**

In accordance with [U.S. Code, Title 38, Chapter 41](#), the state is required to expend JVSG funds in accordance with planned budgets submitted to USDOL VETS. To ensure JVSG funds are expended within the grant period, LWDBs must ensure JVSG-funded position vacancies are posted and filled with qualified veterans in a prompt manner. Failure to properly staff JVSG-funded positions may result in a loss of JVSG program funding and subsequently impact the State's ability to serve Florida's veterans.

JVSG-funded vacancies must be advertised and filled through the People First Job Center at <https://jobs.myflorida.com>. LWDBs may post vacancies through the People First Job Center immediately upon learning of the anticipated vacancy, there is no requirement to wait until the position is vacant. The LWDB may use a single posting to fill multiple vacancies for a period of up to 6 months. LWDBs may contact the DEO Bureau of Human Resource Management for assistance regarding posting vacancies through the People First Job Center.

JVSG funds may be used to support the advertising of JVSG vacancies through private job boards (i.e. Indeed, Monster) in addition to Employ Florida; however, applicants

must be redirected to apply through the People First Job Center. Cross-advertising may increase the pool of qualified veteran candidates and allow greater flexibility with regards to the nomenclature of the position title.

LWDBs must ensure JVSG-funded positions are filled with a qualified veteran by submitting a completed hiring package to DEO within 50 days of the position becoming vacant. LWDBs who are unable to meet this timeline must provide notification to the SVPC with written justification for any foreseen delay in filling the vacancy within 25 days of the position becoming vacant. Notifications may be sent to the SVPC via email at [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com). The SVPC may provide written approval for any delay in filling vacancies for extenuating circumstances, if deemed appropriate by DEO.

#### **D. Pass-Through Funding**

JVSG funds are awarded to pay for specialized staff that provide services to veterans and other eligible persons. DEO is required to provide USDOL VETS a quarterly analysis to ensure the majority of JVSG expenditures are used to support salaries for personnel and fringe benefits.

Pass-through funding is issued to LWDBs in a manner which ensures DEO remains in alignment with JVSG requirements. If a LWDB is not receiving sufficient pass-through funding to support the fair share cost of JVSG staff, they may submit a written request for additional funding to [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com). Upon review and approval by the SVPC and [DEO's Bureau of Financial Management](#), additional funds may be issued.

Pass-through funding provided by JVSG to LWDBs must be expended in accordance with federal cost principles outlined in [2 CFR 200, Subpart E](#). LWDBs who have specific questions regarding allowability of specific costs should contact DEO's Bureau of Financial Management for assistance.

#### **E. National Veterans' Training Institute Mandatory Training**

All JVSG-funded staff must attend a mandated training offered by the National Veterans' Training Institute (NVTI) located in Dallas, Texas and administered by Management Concepts, Inc. This training must be completed within 18 months of the position start date. All costs for training, to include travel and lodging, are provided for by the JVSG. The SVPC will coordinate with individual LWDBs to schedule NVTI training for JVSG-funded staff.

**Note:** Training opportunities through NVTI are available for LWDB Executive Directors, career center managers, and other relevant non-JVSG staff, as approved by the DOL VETS State Director and the requestor's management. If approved, all costs for training, to include travel and lodging, are provided for by the JVSG. A full list of available trainings is located at <https://www.nvti.org/Training/Class-Descriptions>. To

request training for non-JVSG staff, LWDBs must submit a NVTI Training Application Form (Attachment A) to the SVPC by email at [VETS@deo.myflorida.com](mailto:VETS@deo.myflorida.com).

## F. Monitoring

Local JVSG programs must be monitored annually for compliance with state and federal requirements by DEO. DEO will monitor the requirements outlined in this policy and local operating procedures. Additionally, LWDBs must establish local monitoring policies and procedures that include, at minimum:

- a) The duties assigned to DVOP specialists and LVER staff by the LWDB;
- b) The way DVOP specialists and LVER staff are integrated into the LWDB's employment service delivery system; and
- c) Local monitoring procedures for implementation of this policy.

## V. DEFINITIONS

**Disabled Veteran** - A veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary, or a person who was discharged or released from active duty because of a service-connected disability.

**Eligible Spouse** - Spouse of any of the following:

- a) Any veteran who died of a service-connected disability;
- b) Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
  - i. Missing in action;
  - ii. Captured in line of duty by a hostile force; or
  - iii. Forcibly detained or interned in line of duty by a foreign government or power;

**Eligible Veteran** - A person who:

- a) Served on active duty for a period of more than 180 days and was discharged or released therefrom with other than a dishonorable discharge;
- b) Was discharged or released from active duty because of a service-connected disability;
- c) As a member of a reserve component under an order to active duty pursuant to section 12301(a), (d), or (g), 12302, or 12304 of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge; or

- d) Was discharged or released from active duty by reason of a sole survivorship discharge (as that term is defined in [Title 10, 1174\(i\)](#)).

**Significant Barrier to Employment** - A barrier that impedes the veteran from employment as designated by DOL, outlined in [Administrative Policy 102: Veteran Intake at Career Centers](#).

**Special Disabled Veteran** - A veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined to have a serious employment handicap; or a person who was discharged or released from active duty because of service-connected disability.

## VI. ATTACHMENTS

- A. [NVTI Training Application Form](#)

## VII. REVISION HISTORY

Date	Description
06/09/21	Approved by CareerSource Florida Board of Directors.
06/10/21	Issued by Florida Department of Economic Opportunity.