

**Department of Veterans Affairs (VA)
Response to Veterans and Community Oversight
and Engagement Board (VCOEB)**

September 2023 Recommendations

Recommendation 21-01-A: The Secretary of Veterans Affairs write to the Secretary of HUD and identify that HUD's willingness to inform public housing authorities of their ability to raise the AMI thresholds under the HUD-VASH voucher program is a helpful but not sufficient step to address the ineligibility challenge, for the reasons identified above.

VA Response: Concur in Principle. VA agrees with the VCOEB that the Department of Housing and Urban Development (HUD) willingness to inform public housing authorities (PHA) of their ability to raise the area median income (AMI) thresholds under the HUD-Veterans Affairs Supportive Housing (VASH) Voucher Program is a helpful, but insufficient, step to address the ineligibility challenge. Rather than writing to the HUD Secretary regarding this issue, VA is working with the White House Domestic Policy Council (DPC) to develop solutions. DPC is developing a position paper with the input of VA, HUD, and the U.S. Department of Treasury (Treasury) that will inform a pending Congressional briefing on this issue. VA's input on that position paper includes an explanation and rationale for why HUD's actions to date about how AMI thresholds are helpful but inadequate.

Recommendation 21-01-B: as part of the Biden-Harris Administration's recent ALL INside homelessness initiative (identifying the State of California and Los Angeles as two targets for an interagency-focused homelessness prevention strategies), the Secretary of Veterans Affairs ask the HUD Secretary in that same correspondence to invoke authority to proceed by means of notice, effective January 1, 2024, to change the definition of "annual income" under 24 CFR 5.609 to exclude VA disability compensation in the County of Los Angeles.

VA Response: Concur in Principle. VA has already reached out to HUD to advocate for utilizing the new authority effective January 1, 2024, to exclude VA disability compensation from income. As stated above, VA is now working with the White House DPC on agency and/or legislative solutions and will include the possible use of the All INside initiative as a potential pathway for HUD to take agency administrative action in lieu of Congressional action.

Recommendation 21-01-C: The Secretary of Veterans Affairs in that same correspondence ask the HUD Secretary to approve a joint meeting of VA/Treasury/HUD's operational staff and congressional liaison staffs, to meet with appropriate Congressional committees to encourage suitable legislation to accomplish a permanent and nation-wide exception for this disability compensation.

VA Response: Concur in Principle. VA, HUD, and Treasury, along with the White House

DPC, jointly met with staff from the House Veterans Affairs Committee on December 18, 2023, and with staff from the Senate Veterans Affairs Committee on December 20, 2023. In both meetings, VA, HUD, and Treasury reviewed challenges related to VA disability benefits and income eligibility as well as proposed agency actions to address these challenges. Congressional staff indicated that they remain interested in legislative solutions if these agency actions do not comprehensively solve the problem.

Recommendation 21-02-A: The Secretary of Veterans Affairs request the Office of Inspector General review the SMCAO memorandum titled Veterans' Bathhouse Title Search and provide a written report as to whether the Inspector General concurs with the City of Santa Monica's findings regarding the grant deed transfers to which the National Home for Disabled Volunteer Soldiers was a party, specifically the March 3, 1888 deed and April 25, 1900 deed.

VA Response: Non-Concur. VA appreciates VCOEB's recommendation. The mission of the VA Office of Inspector General (OIG) is to "serve Veterans and the public by conducting meaningful independent oversight of the Department of Veterans Affairs." Created under the Office of Inspector General Act of 1978, codified at 5 U.S.C. § 401 et seq., the purpose of OIG is:

- (1) to conduct and supervise audits and investigations relating to the programs and operations [of VA];
- (2) to provide leadership and coordination and recommend policies for activities designed –
 - A. to promote economy, efficiency, and effectiveness in the administration of those programs and operations;
 - B. to prevent and detect fraud and abuse in those programs and operations; and
- (3) to provide a means for keeping the head of establishments and Congress fully and currently informed about problems and deficiencies relating to the administration of those programs and operations and the necessity for and progress of corrective action. 5 U.S.C. § 402.

VA has reviewed the Santa Monica City Attorney Office's (SMCAO) memorandum and myriad VA officials have reviewed the underlying documents effecting the transfer of the Santa Monica property, including both the 1888 and 1900 deeds, over the years. The transfer was properly executed and neither VA nor any successor to the National Home for Disabled Volunteer Soldiers has any valid stake to the property. As such, VA does not believe a report about whether the City of Santa Monica's findings regarding the grant deed transfers to which the National Home for Disabled Volunteer Soldiers falls within the purview of the VA OIG because it does not relate to the programs and operations of VA.

Recommendation 21-02-B: The Secretary of Veterans Affairs request the Office of Inspector General review the March 3, 1888, deed and April 25, 1900, deed and provide a written report as to whether such land transfers were done in accordance with all

applicable law.

VA Response: Non-Concur. VA appreciates VCOEB's recommendation. As discussed above, VA has reviewed the underlying documents effecting the transfer of the Santa Monica property, including both the 1888 and 1900 deeds. The transfers were properly executed in accordance with all applicable laws and neither VA nor any successor to the National Home for Disabled Volunteer Soldiers has any valid stake to the property. As such, VA does not believe that a written report about whether such land transfers were done in accordance with applicable law falls within the purview of VA OIG.

Recommendation 21-03A: The Secretary of Veterans Affairs instruct VA Greater Los Angeles Healthcare System to work in partnership with LA County Department of Economic Opportunity to establish a Veterans American Job Center of California (AJCC) on campus.

VA Response: Concur in Principle. VA also recognizes the value and importance of providing Veterans with access to employment and job training opportunities. The VA Greater Los Angeles Healthcare System (VAGLAHS) currently has a robust partnership with AJCC and other similarly focused organizations throughout the Greater Los Angeles (LA) catchment area. The current strategy is to provide these services close to the Veteran's area of residence. With the increase in Veteran housing on the West LA Campus, expanding these services onsite is a logical next step. VAGLAHS will work with the LA County Department of Economic Opportunity and other potential service providers to explore opportunities for enhancing services to Veterans through a centrally located employment and job training center on the West LA Campus.

Recommendation 21-03B: The Secretary of Veterans Affairs instruct the VA Greater Los Angeles Healthcare System to create a "clinical reminder" that screens Veterans for employment status. If a Veteran screens positive for unemployment or dissatisfaction with current employment, he or she may be referred to the Veterans AJCC on campus for additional skills training and/or employment opportunities.

VA Response: Non-Concur. VAGLAHS Vocational Rehabilitation service currently works closely with other VAGLAHS Departments such as Community Engagement and Reintegration Service HUD-VASH, Welcome Center, and Mental Health to screen for employment and education opportunities. VAGLAHS will also continue to work with the LA County Department of Economic Opportunity and other potential service providers to determine the most efficient employment status tracking and referral methodologies to be utilized at a centrally located employment and job training center on the West LA Campus as well as throughout the Greater LA catchment area. However, it is not clear that requiring primary care physicians to complete a clinical reminder is the appropriate way to ensure that referrals for skills training and/or employment opportunities is the most effective and efficient way to address this need. VAGLAHS may explore the development of a clinical reminder at a later date after further development of the proposed AJCC partnership.

Recommendation 21-03C: The Secretary of Veterans Affairs instruct VA Greater Los Angeles Healthcare System to locate the Veterans AJCC as close to the main hospital as possible, preferably South Campus, for the duration of the pilot initiative. Doing so will allow newly screened patients to access AJCC services for a preliminary consult without the need for additional transportation.

VA Response: Concur in Principle. VAGLAHS will work with the LA County Department of Economic Opportunity and other potential service providers to identify potential locations near the Main Hospital (Building 500) on the South Campus and the North Campus for a centrally located employment, computer literacy, and job training center on the West LA Campus.

Recommendation 21-04A: The Secretary of Veterans Affairs reassess the current parcel release schedule given its potential to undermine complete development of both the "northern residential community" and Town Center areas.

VA Response: Concur in Principle. VA agrees with and appreciates VCOEB's recommendation. The Secretary of Veterans Affairs will reassess the current parcel release schedule to adjust for any changes in circumstance that may increase the efficiency of the housing development on the West Los Angeles campus.

With efficiency in mind, the development of the "northern residential community" and Town Center areas are two of several objectives that will be considered, including but not limited to the following: parcel readiness to build; relocation of staff in existing buildings; relocation of services; parking needs for the community; environmental and historical preservation requirements; and necessary utilities work.

Recommendation 21-04B: The Secretary of Veterans Affairs assess the feasibility of implementing the Alternative Parcel Release Map, as provided by the Veterans and Community Oversight and Engagement Board, prior to releasing Building 408 in May 2024.

VA Response: Concur in Principle. VA concurs in principle and appreciates the VCOEB's recommendation. As acknowledged in response to 21-04A, VA will be reassessing the current parcel schedule. The assessment will include factors such as: VAGLAHS operations, service relocation space needs, traffic, parking, utilities relocation, and construction-related issues, and will include assessing the Alternative Parcel Release Map. VA is completing due diligence, including utilities relocation at Parking Lot 20 / Building 408. The specific release date for Parking Lot 20 / Building 408 is still under evaluation and will reflect these considerations.

Recommendation 21-05A: The Secretary of Veterans Affairs make a determination as to whether or not student veterans attending the California Community College system, particularly in the Los Angeles area, are "at risk" of homelessness and therefore qualify for housing under VA's Enhanced Use Lease program authorized in section 2(b)1 of the West Los Angeles Leasing Act (P.L. 114-226).

VA Response: Concur in Principle. VA acknowledges the good intentions behind VCOEB's Recommendation 21-05A; however, disagrees with the methodology whereby the Secretary of Veterans Affairs would solely render the determination as to whether student Veterans attending the California Community Colleges, particularly in the Los Angeles area, are "at risk" of homelessness. VA manages the referral process of eligible Veterans for the various housing facilities at the West LA Campus and throughout the VAGLAHS five county catchment area. The current process for determining homelessness or "at risk" of homelessness is based upon VA and the Department of Housing and Urban Development criteria which provides an individual assessment for each Veteran, rather than by a broad category such as student.

The West Los Angeles Leasing Act of 2016 and the 2022 Master Plan authorize VA to provide housing for homeless Veterans and Veterans at risk of homelessness at the West LA Campus. VCOEB recommendation 21-05A seeks to fulfill this objective and prioritize eligibility and housing for student Veterans. Recognizing that student Veterans "at risk" of homelessness exist at all levels in the California system of higher education and is not unique to the California Community College system, VAGLAHS will work with the Governor's Office to explore opportunities for enhancing student Veteran housing participation and solutions both at the West LA Campus and throughout the VAGLAHS five county catchment area.

Recommendation 21-05B: The Secretary of Veterans Affairs write a letter expressing his concern about the housing security of student veterans to the Chancellor of California Community Colleges and invite the Chancellor to discuss cooperation in developing a first in the nation pilot program, between VA and a system of higher education, to build dedicated student veteran housing at VA West Los Angeles.

VA Response: Concur in Principle. VA agrees that pilot programs for student Veterans are valuable concepts and require more robust consideration and action. Recognizing student Veterans “at risk” of homelessness exist at all levels of California system of higher education and not unique to the California Community College System, the Secretary of Veterans Affairs will work with VAGLAHS to formulate a letter to the California Governor inviting all California public higher education institutions to create and enhance pilot programs focusing on student Veterans. Such an undertaking would include the West LA Campus and the VAGLAHS five county catchment area.