



June 12, 2012

Director, Regulations Management
Department of Veterans Affairs
810 Vermont Avenue NW, Room 1068
Washington, DC 20420

Docket ID: VA-2012-VACO-0001

Re: Strategies for Serving Our Women Veterans Draft Report for Public Comment

Agency: Department of Veterans Affairs

Action: Notice

To Whom It May Concern:

Business and Professional Women's Foundation (BPW Foundation) appreciates the opportunity to submit comments on the 2012 Draft Report: Strategies for Serving Our Women Veterans. We commend the Department of Veterans Affairs (VA) for recognizing the unique needs and challenges of women Veterans, and for creating a thoughtful proposal that includes goals to improve and adapt how the agency serves women Veterans.

BPW Foundation is a national nonprofit organization with a mission to empower working women to achieve their full potential by partnering with employers to build successful workplaces through education, research, knowledge and policy. The work of BPW Foundation supports workforce development programs and workplace policies that recognize the diverse needs of working women, communities and businesses.

Over the past seven years, a large focus of the BPW Foundation has been on the welfare of women Veterans and their transition to civilian life. In 2007, the organization conducted research with women Veterans about the many factors and complexities they face to successfully transition to employment in the civilian workforce. In 2010, BPW Foundation hosted a National Summit entitled Joining Forces for Women Veterans to identify the main challenges women Veterans face today. Through information gathered at this summit, it was identified that women Veterans need mentors to secure employment and reach their professional goals. As a result, BPW Foundation recently launched Joining Forces for Women Veterans and Military Spouses Mentoring Plus™, a mentoring program recognized by the White House Joining Forces Military Family initiative that will initially match 1,000 women Veterans with mentors who will help nurture their professional development.

BPW Foundation strongly supports the VA's efforts to make sure that women Veterans have the benefits, health care, and services they need and deserve when they return from service. BPW

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Foundation would like to work alongside the VA in seeing that their goal of supporting this growing population is realized in the coming years. Therefore the following comments are in reaction to the recommendations made in the draft report, and how nonprofit organizations like the BPW Foundation can help coordinate and support the VA's overall efforts for women Veterans.

1. Employment and training

On page 18 the report highlights, under employment and training, goal 1 that is to “increase employment and retention of women Veterans by leveraging public and private sector resources and improving synergy, integration, and collaboration”. Further, it states that this goal “seeks to assess available Federal, state, and non-profit programs related to employment and job retention and to better leverage these programs to improve employment levels of women Veterans”. Over 40,000 nonprofits are committed to the same goals as the VA—making life better for military Veterans. Through the revamping of its work with women Veterans, the VA has an opportunity to collaborate with many of these external organizations in order to accomplish all of our mutual goals.

BPW Foundation believes it is essential that the VA fully recognize and reach out to nonprofits that are conducting important work in helping women Veterans not only to secure employment, but have fulfilling long-term careers in civilian life. As an example, BPW Foundation's Joining Forces for Women Veterans and Military Spouses Mentoring Plus™ program should be a recognized resource that is shared by the VA when the agency identifies existing employment-related programs, and performs a gap analysis. In addition, when the VA develops a comprehensive women Veterans' employment plan, it is recommended that the agency include mentorship as an integral part of helping women achieve their employment goals.

2. Close collaboration with nonprofits

On page 11 in the report, there is a statement referring to the fragmentation of services within the VA, “VA activities to improve services and outreach to women Veterans are fragmented”. BPW Foundation would like to take that statement a step further and mention that existing VA services and those offered by nonprofits are fragmented at both the national and local levels, and not seamlessly aligned in a way that women Veterans' can fully benefit from the many services being offered in the private and public sectors. Coordination within not only the VA, but between the VA and nonprofit organizations, at both the national and local levels, is essential for the sake of women Veterans, and making the best use of taxpayer dollars.

While the VA bears the primary responsibility of caring for our women Veterans, it is essential that the agency connects with, supports, and utilizes programs being run by nonprofit and community organizations. One of the main conclusions from the BPW Foundation National Summit was that collaboration among all stakeholders supporting Veterans is essential. Supporting women Veterans' transition to civilian employment, for example, requires companies, training organizations and support systems working together for solutions.

Nonprofits and community-based organizations need to play a key role because while the challenges that women Veterans face are national in scope, solutions happen locally where Veterans live and local organizations have a deep understanding of that community. The VA should be mindful about

leveraging the knowledge and experience of local employers, service providers, nonprofits and networks to support the successful return of women Veterans to civilian life.

3. Conduct external mapping and share with stakeholders

BPW Foundation recommends that the VA should conduct an external mapping of the services being provided by nonprofit and community organizations for women Veterans. This would allow the agency to identify existing overlaps between the VA and the nonprofit sector, and give the VA an opportunity to act as an umbrella entity to capture and identify all of the many existing services available for women Veterans. In addition, it would help to avoid duplication of services and confusion about where women Veterans can seek help either within the VA, or utilizing the services of a nonprofit organization at national and/or local levels. The mapping would also show the VA where and how the agency could partner with and build on the work of nonprofits to help strengthen the agency's overarching goals. In addition, BPW Foundation recommends that the VA shares its mapping of nonprofit services when the agency works with women Veterans so they are aware of all providers and services. BPW Foundation has found through its research and ongoing meetings with women Veterans that the intended recipients are often unaware of the array of services that exist.

4. Streamlining services within Federal agencies

While the VA has prime responsibility to provide services for our Veterans, it is important to recognize and closely coordinate with and not duplicate programs being offered by other Federal agencies that focus on our Veteran population. These agencies include the Department of Labor, Small Business Administration, the Department of Housing and Urban Development, and in some instances the Department of Defense. On page 10, the report mentions the need to "coordinate across the department, duplication of services, and need for a department-wide strategy to address women Veterans" however it doesn't mention cross-agency planning. The VA should be aware of and knowledgeable about what services are being offered by other Federal agencies that women Veterans can benefit from, and make sure to educate women Veterans about other agency programs. This is particularly important since BPW Foundation's research has found that women Veterans lack awareness of or access to benefits, services and programs that address their distinct needs such as affordable housing, starting a small business and finding employment.

5. Quality control

BPW Foundation commends the VA's efforts pertaining to delivery of services and benefits to women Veterans through four key areas including Center for Women Veterans, Women Veterans Healthy Strategic Health Care Group, Office of Mental Health Services, and Women Veterans Coordinators. BPW Foundation appreciates and commends the efforts led by the Center for Women Veterans to help women Veterans understand benefits and services available to them, the Women Veterans Health Strategic Health Care Group for greatly expanding primary care for women Veterans, the Office of Mental Health Services for addressing Military Sexual Trauma, and Women Veterans Coordinators for working hard to improve outreach to women Veterans about their VA benefits. While each effort is warranted and important, each needs to be monitored and tracked in a comprehensive way to ensure that together they are succeeding in meeting the goals and outcomes the VA has set. With limited resources the VA must ensure that there is no duplication of effort and that all programs and offices are

working together. The VA may want to consider streamlining aspects of these four efforts and make sure they are coordinated, surveyed, and reviewed regularly for their ongoing success.

6. Research and data collection

The report frequently cites the importance of research and data collection around the women Veteran population. BPW Foundation agrees that better data analysis is desperately needed to fully understand the challenges that women Veterans face and how to adequately address them. In connection with the VA's goals around women Veterans and employment, one key area of missing data is information from employers on how they meet the needs of women Veterans, and what employers need to know in order to hire and successfully integrate women Veterans into their business. BPW Foundation suggests the VA gathers this information from employers when it "conducts an initial assessment of stakeholder data needs by the end of FY12" (Objective 1.1.; page 20).

Secondly, while it's important that the VA conducts ample research and generate useful data about women Veterans, the agency should also be mindful of the research already done by private and nonprofit organizations. BPW Foundation has useful data that could help the VA's efforts and supports the VA's goal to "develop a coordinated approach for enterprise-wide data collection, management, and analysis processes by end of FY12" (Objective 1.2; page 20). In order to make the significant systematic changes needed to meet the increasing needs of a growing population, current data needs to be streamlined and gaps in knowledge should be identified and filled by both the public and private sectors.

Thirdly, as we mentioned in section 4, *Streamlining services within Federal agencies*, it is important to recognize and closely coordinate with and not duplicate research and data collection efforts by other Federal agencies that focus on our Veteran population. These agencies include the Department of Labor, Small Business Administration, and the Department of Housing and Urban Development, and in some instances the Department of Defense.

Conclusion

Thank you for considering our feedback and recommendations. They are submitted with the overarching goal of supporting the VA's comprehensive action plan to develop strategies that will improve services for our women Veterans. We look forward to collaborating with you in this worthwhile endeavor.

Sincerely,
Business and Professional Women's Foundation

Attachments: Women Veterans in Transition: A Research Project of BPW Foundation

http://www.bpwfoundation.org/index.php/resources/women_veterans_project

Joining Forces for Women Veterans An Inaugural Summit: A Summary Report

http://www.bpwfoundation.org/documents/uploads/JFWV_Final_Summit_Report.pdf

Joining Forces for Women Veterans and Military Spouses Mentoring Plus

<http://www.joiningforcesmentoringplus.org/>

Joining Forces for Women Veterans Employment an Career Issue Brief

http://www.bpwfoundation.org/documents/uploads/final_employment_and_careers_issue_brief.pdf

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