

Veterans' Benefits: The Vocational Rehabilitation and Employment Program

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Summary

Vocational Rehabilitation and Employment for veterans (VR&E) is an entitlement program that provides job training and other employment-related services to veterans with service-connected disabilities. In cases where a disabled veteran is not able to work, the VR&E program provides independent living (IL) services to help the veteran achieve the highest possible quality of life. The VR&E program is administered by the Veterans Benefits Administration (VBA), part of the Department of Veterans Affairs (VA).

To be entitled to VR&E services, a veteran must have been discharged under conditions other than dishonorable and be found to have either (1) a 20% service-connected disability and an employment handicap, or (2) a 10% service-connected disability and a serious employment handicap. After a veteran is found to be entitled to VR&E, a counselor helps the veteran identify a suitable employment goal and determine what services will be necessary to achieve that goal. The veteran is then assigned to one of five reemployment tracks:

- *Reemployment* for veterans who wish to return to work they held prior to their military service;
- *Rapid Access to Employment* for veterans who already have the skills necessary to compete in the job market and only need short-term services such as job search assistance;
- *Employment through Long-Term Services* for veterans who require postsecondary or vocational training to reach their employment goals;
- Self-employment for veterans who have the skills to start businesses; or
- Independent Living for veterans for whom employment is not a viable goal.

Veterans may change tracks if a disability worsens or if their employment objective changes. Services may be provided by the VA, though they are more frequently purchased from an outside provider.

VR&E benefits are typically limited to 48 months, though the benefit period can be extended under certain circumstances. In most cases, veterans are entitled to a subsistence allowance while they are enrolled in an education or training program.

In FY2013, approximately 34,800 veterans developed a new plan of service with VR&E and almost 10,400 veterans completed rehabilitation. In FY2013, costs for mandatory VR&E benefits were approximately \$931 million. Discretionary support services and other administrative costs were approximately \$187 million.

Contents

Background	1
History	1
Authorization and Administration	2
Financing and Costs	2
VR&E Application Process	3
Eligibility	3
Duration of Eligibility	
Entitlement	4
Non-entitlement	4
Case Management and Rehabilitation Planning	4
Services Provided by VR&E	5
Service Delivery Tracks	5
Reemployment Track	5
Rapid Access to Employment Track	5
Self-Employment Track	
Employment through Long-Term Services Track	6
Independent Living Services Track	
Monetary Benefits for VR&E Participants	
Subsistence Allowance	
VR&E Loans	8
VR&E Participation and Outcome Data	9

Tables

Table 1. Vocational Rehabilitation and Employment Program Benefit Costs, FY2009- FY2013	2
Table 2. Vocational Rehabilitation & Employment Program Statistics, FY2008-FY2013	9
Table 3. Training Programs of VR&E Beneficiaries, FY2013	10
Table 4. Outcomes for Veterans Rehabilitated Through the VR&E Program, FY2013	10

Contacts

Author Contact Information	11
Acknowledgments	11

Value of the provides of the program strives to help them achieve the highest quality of independent living possible with a future chance of employment, given medical and technological advances.

This report provides an overview of the VR&E program. After a brief background section, it describes how the program establishes individual veterans' entitlements and the scope of benefits and services available to qualified veterans. The final section provides participation and outcome data.

Background

History

In 1918, Congress passed P.L. 65-178, the Vocational Rehabilitation Act, to provide for the retraining of disabled persons who served in the U.S. military and naval forces. The rehabilitation program was administered by the Federal Board for Vocational Education. On August 24, 1921, control of veterans' rehabilitation was transferred to the newly created Veterans' Bureau. In 1930, Congress created the Veterans Administration by combining three bureaus: the Veterans' Bureau, the Bureau of Pensions, and the National Homes for Disabled Volunteer Veterans. In 1943, Congress passed P.L. 78-16, which broadened eligibility and provided that any eligible veteran may receive up to four years of training specifically directed to restoring employability.

In subsequent years, the scope of the veterans' rehabilitation program has been modified and expanded to better fulfill its mission. The program has undergone several name changes and has usually been housed with the education services in the Department of Veterans' Affairs (VA). In 1999, the VR&E program acquired its current name with the intention of emphasizing employment services and job placement.

In 2004, the Secretary of Veterans Affairs responded to continuing criticisms of VR&E's operations from congressional committees, the Government Accountability Office, and others by forming a task force to evaluate the program. The task force report found little evidence that the program's efforts to obtain jobs for rehabilitated veterans had been effective.³ Among its 110 recommendations, the task force emphasized that VR&E should focus on employment and place

¹ See 38 U.S.C. 3100.

² The VBA website defines suitable employment as "Employment that does not aggravate the Veteran's disabilities, is stable, and is consistent with his or her pattern of abilities, aptitudes, and interests." See http://www.vba.va.gov/bln/vre/ def.htm#se.

³ Department of Veterans Affairs, VA Vocational Rehabilitation and Employment Task Force, *Report to the Secretary of Veterans Affairs: The Vocational Rehabilitation and Employment Program for the 21st Century Veteran, 2004.*

more emphasis on its clients' skills rather than their disabilities. In response to these recommendations, VR&E developed the five-track employment process discussed later in this report.⁴

Authorization and Administration

The VR&E program is authorized by Chapter 31 of Title 38 of the U.S. Code. Veterans' benefits are often referred to by their authorizing chapter of Title 38. As such, VR&E benefits are often described as "Chapter 31" benefits.⁵ The VR&E program is administered by the Veterans Benefits Administration (VBA) within the VA.

Financing and Costs

VR&E costs are divided between mandatory and discretionary spending. VR&E funds are appropriated with other VA-administered readjustment benefits in the Military Construction-Veterans Affairs appropriations bill.

VR&E benefits and the subsistence allowances for VR&E beneficiaries are mandatory spending. Costs for these activities in FY2013 were \$931 million. This total consists of \$564 million for VR&E benefits in the form of tuition, books, and other direct assistance as well as \$367 million in subsistence allowances for individuals who were enrolled in an eligible training program.⁶ **Table 1** presents benefit costs from FY2009 through FY2013.

Table 1.Vocational Rehabilitation and Employment Program Benefit Costs, FY2009-FY2013

(nominal dollars in millions)					
	FY2009	FY2010	FY2011	FY2012	FY2013
Tuition, Books, Supplies, etc.	\$447	\$463	\$472	\$489	\$564
Subsistence Allowance	\$276	\$297	\$287	\$302	\$367
Total	\$723	\$760	\$759	\$ 79 1	\$93 I

Source: Department of Veterans Affairs Budget Justifications, FY2011 through FY2015, available at http://www.va.gov/budget/products.asp.

Notes: Table reflects actual costs for mandatory benefits. Costs do not include administrative expenses and other discretionary services.

The VR&E program's discretionary costs, which cover VR&E staff, counseling from such staff, and other expenses, were \$187 million for FY2013. In FY2013, the VR&E program reported that it employed 1,502 full-time equivalents.⁷

⁴ Testimony of Ruth Fanning, Director, VA's VR&E Service, before the Senate Committee on Veterans' Affairs, February 5, 2008, available at http://www.va.gov/OCA/testimony/svac/080205RF.asp.

⁵ Other examples include the Post-9/11 G.I. Bill (Chapter 33) and the Montgomery G.I. Bill-Active Duty (Chapter 30).

⁶ Department of Veterans Affairs FY2015 Budget, Volume III: Benefits and Burial Programs and Departmental Administration, page VBA-32, http://www.va.gov/budget/products.asp.

⁷ Department of Veterans Affairs FY2015 Budget, Volume III: Benefits and Burial Programs and Departmental (continued...)

VR&E Application Process

There are two determinations between a veteran's application for VR&E and his or her receipt of services: *eligibility* and *entitlement*.

Eligibility

A veteran must apply to the VA to establish eligibility. To be eligible for VR&E services, a veteran must⁸

- have served on or after September 16, 1940;
- have received, or will receive, a discharge under conditions other than dishonorable;⁹ and
- have a service-connected disability rating of 10% or greater.¹⁰

Active duty service members are eligible for VR&E services if their service-connected disabilities are reasonably expected to be rated at a minimum of at least 20% following their discharge.

Duration of Eligibility

Veterans are eligible for VR&E services for 12 years after separation from active military duty. In cases where a veteran was notified of a service-connected disability rating after separation, eligibility extends 12 years from the date of notification.

The period of eligibility may be extended if the VA determines that the veteran has a serious employment handicap, has not yet been rehabilitated to the point of employability, has been rehabilitated but still cannot perform the duties required, or needs more services because the occupational requirements have changed. An objective evaluation is required for these circumstances to be determined.¹¹

For independent living services, if the medical condition is so severe that achievement of the vocational goal is not feasible and that goal is necessary to ensure that the veteran will achieve maximum independence, the period of eligibility may be extended.¹²

^{(...}continued)

Administration, page VBA-249, http://www.va.gov/budget/products.asp.

⁸ See 38 U.S.C. 3102-3103.

⁹ For more information on discharge criteria, see CRS Report R42324, *"Who is a Veteran?"—Basic Eligibility for Veterans' Benefits*, by (name redacted).

¹⁰ For an in-depth discussion of the VA's disability evaluation process and policies, see archived CRS Report RL33991, *Disability Evaluation of Military Servicemembers*, by (name redacted) and (name redacted).

¹¹ See 38 U.S.C. 3013(c).

¹² See 38 U.S.C. 3103(d).

Entitlement

Once eligibility is established, an applicant completes a comprehensive evaluation with a Vocational Rehabilitation Counselor (VRC). The evaluation includes

- an assessment of the veteran's interests, aptitudes, and abilities;
- an assessment of whether service-connected disabilities impair the veteran's ability to secure and maintain suitable employment; and
- identification of services necessary to maintain a career or achieve maximum independence.

An applicant is entitled to VR&E services if the evaluation finds that he or she has

- a 20% service-connected disability and an employment handicap; or
- a 10% service-connected disability and a serious employment handicap.

An *employment handicap* is an impairment of a veteran's ability to prepare for, obtain, or retain employment consistent with his or her abilities, aptitudes, and interests.¹³

A *serious employment handicap* is a significant impairment of a veteran's ability to prepare for, obtain, or retain employment consistent with his or her abilities, aptitudes, and interests.¹⁴

To be entitled to VR&E services, the veteran's service-connected disability must contribute to the employment handicap and VR&E must be able to identify, observe, and measure it.

Non-entitlement

A veteran who applies for VR&E services but is not found to be entitled to services is to be informed about appeal rights and the appeals process. The VA will also use the information gathered in the application process to recommend other services.¹⁵

Case Management and Rehabilitation Planning

After a veteran is found to be entitled to VR&E services, a case manager is assigned to work with the veteran. The case manager works in conjunction with a VRC and the veteran to determine an employment goal and assess obstacles to employment. A written rehabilitation plan is then developed, describing the goal of the VR&E program and the services required to achieve the goal.¹⁶ The required services may be provided by the VRC or the case manager may provide

¹³ See 38 U.S.C. 3101(1).

¹⁴ See 38 U.S.C. 3101(2).

¹⁵ For more information on federal employment programs for veterans, see CRS Report R42790, *Employment for Veterans: Trends and Programs*, coordinated by (name redacted).

¹⁶ See 38 U.S.C. 3106.

referrals for other services. The plan is reviewed with the participation of the client at least once a year.¹⁷

Services Provided by VR&E

The most common services provided by VR&E agencies are funding for higher education and short-term employment services like job search assistance. The full range of services that VR&E agencies are required to make available to entitled clients, however, is much broader and includes a variety of specialized services for workers with disabilities.¹⁸

Service Delivery Tracks

Each VR&E beneficiary is assigned to a service delivery track based on the veteran's objective and services needed. If necessary, a veteran may change tracks while enrolled in the VR&E program.

Reemployment Track

The Reemployment Track is for veterans who wish to return to work with their previous employers. In addition to the case management and counseling that all VR&E beneficiaries receive, veterans on the reemployment track may receive assistance from the VA to make their workplace more accessible. They may also receive counseling on workplace rights for veterans.¹⁹

A veteran on this track is considered rehabilitated when he or she has completed the employment program and maintained suitable employment for 60 days.²⁰

Rapid Access to Employment Track

The Rapid Access to Employment Track emphasizes the goal of immediate employment and is available to separating veterans who already have the skills necessary to compete in the job market in suitable occupations. On this track, VR&E services may include job readiness preparation, resume development, or job search assistance. The VRC may also counsel veterans on this track in disability rights and assist an employer in providing accommodations to a disability.

A veteran on this track is considered rehabilitated when he or she has completed the employment program and maintained suitable employment for 60 days.

¹⁷ See 38 U.S.C. 3106(b).

¹⁸ Additional required services may include corrective assistive devices, travel expenses, and independent living services. See 38 U.S.C. 3104, 3109, and 3120.

¹⁹ In addition to the rights afforded by the Americans with Disabilities Act of 1990 (ADA; 42 U.S.C. 12101-12213), disabled veterans are also entitled to additional rights under the Uniformed Services Employment and Reemployment Rights Act of 1994 (USERRA, 38 U.S.C. 4301-4335).

²⁰ Rehabilitation criteria are from the Government Accountability Office (GAO) report *VA Vocational Rehabilitation and Employment: Better Incentives, Workforce Planning, and Performance Reporting Could Improve Program.* January 2009. Rehabilitation criteria are also available at 38 C.F.R. 21.283.

Self-Employment Track

This track is for veterans who have limited access to traditional employment and need flexible work schedules and a more accommodating work environment because of their disabling conditions or other special circumstances. Veterans may be provided with assistance in the development of a business plan, training in the operation of small businesses, financial assistance, and guidance on obtaining adequate resources to implement the business plan.

A veteran on this track is considered rehabilitated when he or she has completed the selfemployment program and maintained a viable business for one year.

Employment through Long-Term Services Track

This track targets veterans who need long-term employment training to prepare them for suitable employment. Formal classroom courses are the most common long-term service, though training may also include on-the-job training, apprenticeships, internships, or other workplace preparation programs.

Services last as long as is necessary for the beneficiary to attain the objectives set out in his or her employment plan, but may not exceed 48 months (or the equivalent when pursued on a part-time basis).²¹ In limited circumstances (such as a veteran's disability worsening during the rehabilitation process and the original employment objective becoming unviable), a rehabilitation program can be extended beyond 48 months. Extensions must be approved by a counseling psychologist and a VR&E officer.²²

A veteran on the employment through long-term services track is considered rehabilitated when he or she has completed a training program and maintained employment for 60 days.

Independent Living Services Track

The Independent Living (IL) Services Track is for veterans who may not be able to work immediately and need additional rehabilitation to enable them to live more independently. The short-term focus of the program is on allowing veterans to participate in family and community life, but it also aims to increase their ability to possibly return to work in the longer term.²³ Veterans on this VR&E track may be provided with assistive technology, independent living skills training, and connections to community-based support services.

Unlike the other VR&E tracks, the IL track is limited in the number of veterans it can serve. Currently, 2,700 veterans are permitted to begin an IL program each year.²⁴ This limit is waived

²¹ See 38 C.F.R. 21.70(b)(1).

²² See 38 C.F.R. 21.78.

²³ See 38 U.S.C. 3109.

²⁴ This limit of 2,700 was established by the Veterans Benefits Act of 2010 (P.L. 111-275). The cap was previously increased to 2,500 by the Veterans Education and Benefits Expansion Act of 2001 (P.L. 107-103) and to 2,600 by the Veterans' Benefits Improvement Act of 2008 (P.L. 110-389).

for veterans who have been adversely affected by a natural or other disaster, as determined by the VA. 25

To meet the needs of veterans with severe disabilities and mobility impairments, VR&E's IL program may work with the VA's Loan Guaranty Service and the Specially Adapted Housing (SAH) grant program, the Home Improvements and Structural Alterations (HISA) program, the Automobile Adaptive Equipment program, and the Visually Impaired Services Team (VIST).²⁶ The VR&E also works with the Committee on Care of Veterans with Severe Mental Illness (SMI)²⁷ and the Traumatic Brain Injury Caregivers Panel.²⁸

IL programs for veterans are typically limited to 24 months. This limit can be extended if the VA determines that an extension would substantially increase a veteran's level of independence in daily living. The limit may also be extended for veterans who served after September 11, 2011, and have a severe disability.

Monetary Benefits for VR&E Participants

In addition to training benefits and other employment services, veterans who are entitled to VR&E services are also eligible for certain financial benefits.

Subsistence Allowance

Many veterans who are receiving benefits under the VR&E program are also eligible for a monthly subsistence allowance. Veterans who are only receiving (1) initial evaluation, (2) placement or post-placement services, and (3) counseling from the VR&E program are not eligible for a subsistence allowance, nor are veterans who are enrolled in a training program less than half-time.²⁹

The VR&E subsistence allowance varies by the type of program the veteran is enrolled in and whether or not the veteran has dependents. As of October 1, 2014, the monthly allowance for a veteran enrolled full-time at an institute of higher learning with two dependents is \$882.³⁰ The subsistence allowance is increased each year proportionate to the rate of inflation.³¹ The subsistence allowance continues as long as the veteran is enrolled in an eligible program and

²⁵ See 38 U.S.C. 3120(e)(2). This change was made by Section 701(c) of P.L. 112-154, Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012.

²⁶ For information on housing and automobile grants, see CRS Report RL34626, *Veterans' Benefits: Disabled Veterans.*

²⁷ The 2004 VR&E Task Force Report noted "that the single largest group of veterans for whom an employment plan is not considered feasible was for veterans with psychiatric disabilities," p. A-64.

²⁸ P.L. 110-181, signed by President George W. Bush on January 28, 2008, mandated the creation of the Traumatic Brain Injury Caregivers Panel to develop coordinated, uniform, and consistent training curricula to be used in training family members in the provision of care and assistance to current and former members of the Armed Forces with traumatic brain injury. For details, see CRS Report RL34371, *"Wounded Warrior" and Veterans Provisions in the FY2008 National Defense Authorization Act*, by (name redacted), (name redacted), and (name redacted).

²⁹ See 38 U.S.C. 3108 and 38 C.F.R. 21.260(d).

³⁰ A complete list of subsistence rates for VR&E participants as of October 1, 2014, is available at http://www.benefits.va.gov/VOCREHAB/docs/SAFY15.pdf.

³¹ See 38 U.S.C. 3108.

continues for two months after the program of training has been completed. In cases where a veteran is displaced as the result of a natural or other disaster while receiving a subsistence allowance, the subsistence allowance is extended for an additional two months.³²

Typically, veterans are not permitted to participate in both the VR&E program and another VA educational program (such as a G.I. Bill program). However, veterans who are eligible for both VR&E services and the Post-9/11 GI Bill (also known as Chapter 33 benefits) may collect the housing allowance offered under Chapter 33 while receiving training and other benefits under VR&E. This policy was instituted to eliminate the incentive for disabled veterans to choose the Post-9/11 GI. Bill (which typically offers a higher cash allowance but fewer services) over the VR&E program (which offers a lower cash allowance but more supportive services).

Unlike the VR&E subsistence allowances, which are the same for veterans nationwide, Chapter 33 housing allowances are determined by a veteran's geographic location. In many cases, Chapter 33 housing allowances are greater than VR&E subsistence allowances: as of October 1, 2014, the Chapter 33 housing allowance ranges from about \$840 to about \$3,700 per month.³³

In FY2013, the VA reported that VR&E subsistence allowance benefits totaled \$367 million.³⁴ This estimate includes VR&E beneficiaries who collected the traditional subsistence allowance as well as VR&E beneficiaries who collected the Chapter 33 housing allowances in place of the VR&E subsistence allowance.

VR&E Loans

Veterans who are entitled to VR&E benefits may also be eligible for interest-free loans. These loans are only available to veterans who have a plan of service with VR&E and "would otherwise be unable to begin, continue or reenter his or her rehabilitation program."³⁵ The maximum loan amount is equal to twice the weekly subsistence allowance for a veteran with no dependents (\$1,207 in FY2014).³⁶

Repayment of the loan is made in monthly installments from future wages, pensions, subsistence allowances, educational assistance allowance, or retirement pay. The VA reported that 2,693 loans totaling approximately \$2.4 million were made in FY2013 and that the default rate was less than 0.5%.³⁷ The VR&E loan program cost \$453,000 in FY2013, of which \$346,000 was for administrative expenses.³⁸

³² See 38 U.S.C. 3108(a)(2)(B). This change was made by Section 701(b) of P.L. 112-154, Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012.

³³ The allowance under Chapter 33 is equal to the basic housing allowance for a service member with dependents in pay grade E-5. Allowances are determined by zip code. Full list of allowances by locality are at http://www.defensetravel.dod.mil/Docs/perdiem/browse/Allowances/BAH/PDF/2014/2014-With-Dependents-BAH-Rates.pdf

http://www.defensetravel.dod.mil/Docs/perdiem/browse/Allowances/BAH/PDF/2013/20 13-With-Dependents-BAH-Rates.pdf.

³⁴ U.S. Department of Veterans Affairs, FY2015 Budget Submission, Volume III: Benefits and Burial Programs and Departmental Administration, page VBA-32, http://www.va.gov/budget/products.asp.

³⁵ See 38 C.F.R. 21.274(c).

³⁶ See 38 U.S.C. 3112.

³⁷ U.S. Department of Veterans Affairs, FY2015 Budget Submission, Volume III: Benefits and Burial Programs and (continued...)

VR&E Participation and Outcome Data

Table 2 shows participation data from FY2008 through FY2013. The categories for "applicants," "eligible," "completed evaluation," "entitled to services," and "new plans of service" trace the number of individuals who continued through each stage of the application process, and in many cases, a single veteran may be counted in multiple categories. The "rehabilitated" category includes veterans who secured and maintained suitable employment or completed an independent living program. "Participants" include veterans in any stage of the VR&E process after the applicant and evaluation phases have been completed. In includes veterans who began a VR&E plan in a prior year as well as those in interrupted rehabilitation plan status.

VR&E Category	2008	2009	2010	2011	2012	2013
Applicants	68,949	77,998	69,390	65,239	72,605	80,812
Eligible	65,784	74,617	66,717	62,726	69,683	78,159
Completed evaluation	39,910	44,089	46,523	n/a	61,622	66,749
Entitled to Services	35,166	38,802	41,102	41,229	45,167	54,440
New Plans of Service	26,703	28,997	27,904	27,821	30,806	34,806
Rehabilitated	11,039	11,022	10,038	9,862	9,949	10,397
Participants	103,126	110,750	7, 30	116,295	121,236	135,815

Table 2.Vocational Rehabilitation & Employment Program Statistics, FY2008-FY2013

Source: Table prepared by CRS using data from the Department of Veterans Affairs, Veterans Benefits Administration, *Annual Benefits Report* for FY2008-FY2013. Reports are available at http://www.vba.va.gov/REPORTS/abr/index.asp.

Due to the multi-year nature of many rehabilitations and the complex and diverse nature of the VR&E population, the data in **Table 2** should not be used to calculate the efficacy of the program. A more precise indicator of efficacy may be the VR&E rehabilitation rate, which is published by the VA each year. In calculating this rate, the numerator is the total number of rehabilitated veterans and the denominator is the total number of veterans exiting the program minus veterans who are employed in jobs other than their rehabilitation objective, are unemployable for medical or psychological reasons, or transferred to the Post-9/11 GI Bill program. In FY2013, VR&E's rehabilitation rate was 68%. Between FY2010 and FY2012, the rate varied between 76% and 77%.³⁹

Table 3 shows the types of programs that beneficiaries participated in during FY2013. The table only includes individuals who were concurrently receiving a subsistence allowance while they

^{(...}continued)

Departmental Administration, page VBA-61, http://www.va.gov/budget/products.asp.

³⁸ U.S. Department of Veterans Affairs, FY2015 Budget Submission, Volume III: Benefits and Burial Programs and Departmental Administration, page VBA-61, http://www.va.gov/budget/products.asp.

³⁹ U.S. Department of Veterans Affairs, FY2015 Budget Submission, Volume III: Benefits and Burial Programs and Departmental Administration, page VBA-260, http://www.va.gov/budget/products.asp.

completed an educational program. It does not include individuals who were receiving training without an accompanying subsistence allowance nor does it include individuals who received nonmonetary benefits from VR&E such as counseling or job search assistance.

Program	Individuals	Share of Beneficiaries
Undergraduate School	53,780	79.8%
Graduate School	5,849	8.7%
Vocational/Technical School	3,486	5.2%
College, Non-degree	1,635	2.4%
Other ^a	2,683	4.0%
Total	67,433	100.0%

Table 3. Training Prog	rams of VR&E	Beneficiaries.	FY2013
		Beneficiaries,	

Source: Department of Veterans Affairs, Veterans Benefits Administration *Annual Benefits Report* for FY2013, VR&E Section, p.7. http://www.benefits.va.gov/REPORTS/abr/ABR-VocRehab-FY13-09262014.pdf.

Note: Data only include individuals who received a subsistence allowance.

a. Includes veterans enrolled in extended evaluation, independent living, paid on-the job training, non-pay work experience in government, non-paid on the job training, apprenticeships, improvement of rehabilitation potential, high school, or a farm co-op.

Table 4 presents more detail on VR&E participants who completed the rehabilitation process in FY2013. About 84% of veterans who were rehabilitated achieved an employment outcome. Among rehabilitated veterans who achieved an employment outcome, the average annual wage after rehabilitation was \$37,717.⁴⁰

Table 4. Outcomes for Veterans Rehabilitated Through the VR&E Program, FY2013

	Number	Share of Rehabilitated VR&E Participants
Rehabilitated VR&E Participants	10,397	100.0%
Completed Independent Living Program	1,708	16.4%
Achieved Employment Outcome	8,689	83.6%

Source: Department of Veterans Affairs, Veterans Benefits Administration Annual Benefits Report for FY2013, VR&E Section, p.10 and 11. http://www.benefits.va.gov/REPORTS/abr/ABR-VocRehab-FY13-09262014.pdf.

⁴⁰ Department of Veterans Affairs, Veterans Benefits Administration *Annual Benefits Report* for FY2013, VR&E Section, p. 11. http://www.benefits.va.gov/REPORTS/abr/ABR-VocRehab-FY13-09262014.pdf

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