INTERNAL MEMORANDUM

TO:	Kent Carlson and Michael Wishnie, Co-Chairs, Task Force to Study the Use of MOS Specialty Training as a Substitute for State Licensing Requirements
FROM:	Law Student Interns, Veterans Legal Services Clinic, Yale Law School
DATE:	November 20, 2013
RE:	Data Collection and Oversight of Veterans Employment Initiatives

This memo considers how to oversee implementation of veterans employment initiatives in Connecticut. It recommends that Connecticut adopt state-level initiatives for data collection and enact oversight mechanisms in order to track progress toward increased veteran employment and ensure compliance with the proposed legislation. These recommendations build from nationwide best practices on veterans issues and incorporate lessons from oversight efforts in other areas, such as living-wage ordinances. These enforcement proposals would help ensure that the state's veterans employment goals are achieved in practice.

I. Recommendations

- The Task Force should consider recommending that the Connecticut legislature establish a robust data collection plan that allows for progress and enforcement monitoring and makes these data available to the public.
- The Task Force should consider recommending that the Governor's office create a new gubernatorial advisory body or charge an existing advisory body with oversight of the implementation of veterans employment initiatives.
- The Task Force should consider recommending that the Connecticut legislature establish a complaint mechanism for veterans aggrieved by an agency's failure to comply with its veterans' employment requirements.
- The Task Force should consider recommending that the Connecticut legislature establish an appropriate remedy for service members aggrieved by an agency's failure to implement veterans employment legislation.

II. Data Collection

States that have been recognized as national leaders on the issue of veterans employment have included data collection and dissemination in their military credentialing legislation.[1] Following this model, the Connecticut legislature should provide for data collection and publication in any new legislation related to licensing for veterans and military families. Some data collection is already occurring, but the centralized reporting of uniform data sets on veterans' licensing processes would be useful both to track the state's progress toward veterans employment and to monitor the implementation of adopted streamlining measures.

There are several ways to collect and publish this data. After passage of any new law, each state agency could be required to submit periodic reports to the Governor and the legislature in which it provides data on licenses for veterans, including: 1) the number of veterans, active duty service members, and military spouses that applied for its licenses; 2) the number of such applicants who were approved for licensing, and; 3) the number of applicants who were denied

licenses. Where agencies have denied a license to a veteran or military spouse, the legislation should direct the agency to specify the reasons for denial. Maryland adopted this model for reporting its progress toward employment of veterans in that state.[2]

Two issues that arise in such a data collection process are uniformity and public awareness. To ensure uniformity of the data collected by each agency, any legislation related to military credentialing could specify the procedures that agencies must follow. This would ensure that the legislature can compare data across multiple agencies that are working to streamline their licensing procedures. To increase public awareness of effort to credit military experience, agencies could be required to file the data collected with the Governor on a quarterly basis and to provide semi-annual reports of their activities related to veterans licensing. These semi-annual reports would be made available to the public online, where the state's overarching goals and progress could be tracked.

A similar procedure could apply to educational institutions seeking to credit military experience. Connecticut's educational institutions could be required to track and publish information including: 1) the number of veteran students in their system; 2) the range of possible credit the institution evaluates for transfer, and; 3) the aggregate results of what credit is granted to veterans and what credit is not granted for military experience. Like other state agencies, educational institutions could be required to provide justifications for their decisions about how to credit military experience.

This effort would be bolstered by legislation that requires schools to provide centralized guidance to veteran-students.[3] If such guidance were required, the counselors who communicate with veterans about employment opportunities[4] could publish information about what resources they have provided to veterans, how many veterans enroll at their institutions, and what type of military occupational specialties (MOS) students tend to hold. Such record keeping could also include basic information about the service member such has her MOS, separation date, and educational experience. This information would prove useful as the state works to facilitate veterans' education and employment. New York, another national leader on veterans issues, has adopted this model for crediting military experience in its educational institutions.[5]

III. Oversight Mechanisms

In addition to requiring each state agency to publish information about how its licensing process works for veterans, the Task Force should consider recommending legislation to establish an inter-agency advisory group that would assist the Governor with the efficient coordination of state services for veterans. An inter-agency group could encourage state agencies to identify ways that Connecticut can better recognize military skills and training in all of its licensing procedures.[6] The Task Force should also consider recommending that the legislature establish a complaint mechanism system for veterans aggrieved by an agency's failure to comply with the law. One possibility would be a central, anonymous reporting line, similar to Mayor Bloomberg's 3-1-1 initiative, which would allow the Governor and legislature to collect data about where problems exist so that they could surge resources accordingly. Finally, veterans should have the right to an appropriate remedy if aggrieved by an agency's failure to honor its obligations regarding the promotion of veteran employment.

REFERENCES & NOTES

[1] *See, e.g*., the Maryland's Veterans' Full Employment Act of 2013. S.B. 273, § 2.5-104 (2013).

[2] *Id.*

[3] See Memorandum: Case Studies on Military Credentialing. That memorandum, which was submitted to the Task Force before its last meeting, includes detailed information on New York's Experience Counts Campaign.

[4] *Id.*

[5] *Id.*

[6] *Id.*