



# VA Vet Centers: Opportunities to Improve Survey of Counselor Productivity Expectations

GAO-25-107631

Q&A Report to Congressional Committees

July 31, 2025

Accessible Version

## Why This Matters

Vet Centers play an important role in helping veterans and service members readjust to civilian life or to continued military service. They provide social and psychological services—including individual, group, marriage, and family counseling—to eligible veterans, service members, and their families.

Within the Department of Veterans Affairs (VA), the Veterans Health Administration's (VHA) Readjustment Counseling Service (RCS) operated 300 Vet Centers nationwide in fiscal year 2024. The services and structure of Vet Centers are separate from the care provided at VHA medical facilities to better ensure privacy and confidentiality. Each Vet Center has one or more counselors. Counselors provided nearly 1.3 million counseling sessions to 110,754 unique clients across Vet Centers in fiscal year 2024, according to RCS. Each Vet Center also has a director, who is responsible for overseeing that Vet Center's staff. Vet Center directors also provide counseling services.

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (2023 National Defense Authorization Act) includes a provision requiring VA to evaluate productivity expectations of Vet Center counselors annually by obtaining systematic feedback from counselors and to implement any needed changes to the expectations. The 2023 National Defense Authorization Act also includes a provision for GAO to audit this feedback. In response to this provision, RCS administered a survey in 2023; this report examines the feedback RCS obtained.

## Key Takeaways

- In 2023, RCS administered its first *Counselor and Client Engagement Survey* to all Vet Center counselors and directors to solicit feedback on how productivity expectations affect client care and counselor welfare.
- RCS obtained an overall response rate of 37 percent for the survey but did not conduct an analysis of potential nonresponse bias in the survey (i.e., the degree to which respondents and nonrespondents differ on key characteristics). Thus, RCS does not know the degree to which responses are representative of all counselors and directors.
- We identified issues with the clarity of the survey that limit RCS's ability to use the feedback collected to understand respondents' perspectives on counselors' productivity expectations. For example, it was unclear whether respondents were to provide feedback on the time management or the encounters expectations or both.
- We recommend that RCS 1) analyze the potential for nonresponse bias in its *Counselor and Client Engagement Survey* and, as appropriate, develop strategies to increase the likelihood of representative survey findings and 2) modify the survey to clarify that counselors and directors should provide feedback on both productivity expectations for counselors.

## What are RCS's productivity expectations?

RCS has productivity expectations for both Vet Center counselors and directors. For counselors, RCS has two expectations (see fig. 1):

- 1) meeting a minimum percentage of time spent with clients (time management expectation) and
- 2) generating a minimum number of client encounters through a combination of individual and group counseling sessions (encounters expectation).

**Figure 1: Vet Center Counselor Productivity Expectations, as of April 2025**



Source: GAO analysis of Veterans Health Administration documentation; Sensvector/stock.adobe.com (illustration). | GAO-25-107631

For example, a counselor with a 40-hour work week would be expected to

- spend at least 20 hours a week directly providing services to clients to meet the time management expectation.
- have at least 25 encounters (20 hours of direct service x 1.25) to meet the encounters expectation. To get to 25 encounters, a counselor could, for example, hold 19 individual counseling sessions and one group counseling session with six clients.

Vet Center directors also have time management and encounters productivity expectations. The time management expectation for directors differs from the expectation for counselors. Specifically, the amount of time directors are expected to dedicate to providing direct services or outreach to clients ranges from 13 to 38 percent of their time, depending on the number of counselors at their respective Vet Center. The encounters expectation for directors is the same as for counselors.

## How and to whom did RCS administer the survey?

RCS administered an online survey to all Vet Center counselors and directors. RCS provided a link to the survey using email distribution lists for each of its five districts. Each district oversees policy implementation and staff at the Vet Centers within its district.

RCS officials said they administered the survey to directors in addition to counselors because directors would have feedback about counselors' productivity expectations.

The survey link was available to Vet Center counselors and directors for 3 weeks, from December 4 through December 22, 2023. RCS estimated that the survey would take approximately 10 minutes to complete.

## On what topics did RCS solicit feedback through the survey?

RCS solicited feedback on the ways productivity expectations may have affected Vet Center client care and counselor welfare, as outlined in the 2023 National Defense Authorization Act.<sup>1</sup>

The survey had 25 questions:

- The first five questions asked respondents to provide personal characteristic information such as respondents' Vet Center locations, staff positions, and years employed with RCS.

- The next 20 questions addressed topics outlined in the 2023 National Defense Authorization Act. For example, there were questions about any positive and negative effects of productivity expectations on client care, recruitment and retention of counselors, counselor welfare, and the accuracy and timeliness of reporting counseling services. Additionally, other topics included challenges to providing care and respondents’ perspectives on client interest in telehealth and group counseling.

See appendix I for the full list of the survey questions.

What steps did RCS take to encourage participation in the survey?

To encourage participation in the survey, RCS provided assurances to Vet Center counselors and directors that their responses would be confidential. RCS also used reminders to encourage them to participate in the survey, although participation was voluntary.

**Confidentiality.** RCS administered the survey via an email that included an anonymous web address—a single, reusable link not connected to the name or email of the respondent—to access the survey. Additionally, in filling out the survey, respondents were not asked to provide their names or contact information.

**RCS newsletter reminders.** During the 3 weeks the survey was open in December 2023, RCS included reminders in its weekly email newsletter sent to Vet Center employees to encourage counselors and directors to respond to it.

**Local reminders.** Vet Center counselors and directors also received additional reminders from leadership within each of RCS’s five geographic-based districts during the 3-week period the survey was open. In three districts, counselors and directors received email reminders. In the other two districts, the survey was discussed during Vet Center director calls and staff meetings, according to officials.

What was the survey response rate?

The overall survey response rate was 37 percent of Vet Center counselors and directors. (See table 1.) RCS officials told us administering the survey in December could have contributed to a lower response rate, given staff leave schedules at that time of year.

Lower survey response rates raise the risk of survey responses being less representative of experiences of all counselors and directors. The degree to which counselors and directors who responded to the survey differ from those who did not on key characteristics (nonresponse bias) could undermine the confidence with which RCS could use survey findings to draw conclusions about the experiences of counselors and directors overall.

Table 1. Response Rates for the 2023 Counselor and Client Engagement Survey, by Respondent Type			
Respondent type	Number of staff <sup>a</sup>	Number of respondents <sup>b</sup>	Response rate <sup>c</sup>
Counselor	965	318	33%
Director	264	130	49%
Total	1,229	451 <sup>d</sup>	37%

Source: GAO analysis of Veterans Health Administration’s Readjustment Counseling Service (RCS) survey data and documentation. | GAO-25-107631

Note: RCS administered the 2023 Counselor and Client Engagement Survey from December 4 through December 22, 2023, to solicit feedback on the ways in which productivity expectations affect Vet Center client care and counselor welfare.

<sup>a</sup>“Number of staff” refers to counselors and directors employed by RCS, based on RCS employment data as of December 22, 2023, the date the survey closed.

<sup>b</sup>The number of respondents was obtained from the survey question asking each respondent to indicate whether the respondent was a counselor or director.

<sup>c</sup>Response rates were calculated by dividing the number of respondents by the number of staff at the close of the survey.

<sup>d</sup>This total includes three respondents who did not respond to the survey question that asked them to indicate whether they were counselors or directors.

RCS officials told us that they did not conduct an analysis of potential nonresponse bias for the 2023 survey. Officials said this was because they could not ascertain the exact nonresponse rate with the anonymous web address that RCS used to administer the survey.

However, there are other ways to address the risk of nonresponse bias in surveys. Federal standards for statistical surveys set by the U.S. Office of Management and Budget call for agencies to conduct a nonresponse bias analysis for any survey with a response rate of less than 80 percent.<sup>2</sup> The standards suggest that agencies consider comparing characteristics of respondents to those of the total population eligible to be surveyed, which can provide an indication of possible bias in the survey.

For example, RCS could compare the characteristics of the people who responded to the survey (e.g., staff position or Vet Center location) to the characteristics of the overall population of Vet Center counselors and directors based on RCS employment data. Such comparisons could help RCS identify whether certain groups are underrepresented in the survey responses. If a nonresponse bias analysis uncovers group differences in responses, RCS could take actions, such as additional communication to underrepresented groups, to encourage completion of subsequent surveys.

In the absence of a nonresponse bias analysis, RCS does not know if the reported effects of productivity expectations on client care and counselors' and directors' welfare were biased to be more positive or more negative than they would have been if the entire population had responded. By conducting an analysis of nonresponse bias, RCS could identify actions for subsequent surveys that may be needed to increase the likelihood of representative survey findings.

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### **What safeguards were used to protect the survey data collected?**

To safeguard the survey data collected and prevent any potential alteration, VHA's National Center for Organization Development stored the survey responses in a database that only its staff could access. This center provides guidance on survey development and assistance with analyzing survey results to offices across VA.

Officials from the center told us they are prohibited from disclosing identifiable information from the survey data due to the promise of confidentiality included in the survey's introduction. The survey introduction also specified that data would not be reported for a group with fewer than five respondents. The one exception was the free-text responses associated with four open-ended questions, which the center provided verbatim to RCS as disclosed in the survey's introduction.

The National Center for Organization Development prepared a final report in January 2024 for RCS that summarized aggregated survey results and provided frequencies and average scores for closed-ended questions. For these questions, the report also showed aggregated results broken out by respondent personal characteristics, such as position (i.e., counselor, director). Center officials also provided RCS the free-text responses for the four open-ended questions in a separate report (without including respondent personal characteristics).

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**To what extent does the survey collect quality information on productivity expectations?**

We identified two issues with the clarity of the 2023 survey, which resulted in RCS collecting feedback that was of limited quality. This limits RCS's ability to use the feedback to understand respondents' perspectives on productivity expectations.

**Unclear which productivity expectations the survey was assessing.** We found the survey was not clear as to which productivity expectations respondents should assess. Specifically, in the survey there were four open-ended questions on the positive and negative effects of productivity expectations on client care and counselor welfare. (See appendix I.) These four questions were preceded by a definition of "productivity expectation" to establish a standardized meaning of the term for respondents. However, the definition was incomplete as it only included the time management expectation, not the encounters expectation as well.

In our review of the feedback on those four questions, we found that some respondents commented on the time management expectation; some commented on the encounters expectation; some commented on both; and for some respondents, it was not clear which expectation they assessed. For example, for the question on the negative effects of productivity expectations on client care, we found that of the 307 counselors responding to the question,

- 16 percent commented specifically on the encounters expectation, despite its not being included in the survey's definition of the productivity expectations respondents were to assess.
- 59 percent did not specify an expectation in their response, resulting in unclear feedback.

Both the time management and encounters expectations were in place at the time of the 2023 survey. However, RCS officials told us that they did not include the encounters expectation in the survey definition because they were in the process of updating terminology for this expectation, but not the expectation itself. As such, RCS intended for respondents to only comment on the time management expectation, according to RCS officials.

In April 2025, these officials told us that they intend to add the encounters expectation to the definition for the survey they plan to administer in 2026. However, as of April 2025, RCS had not developed the survey instrument and there were no further plans or documentation for us to review. As a result, whether the 2026 survey will clearly ask for feedback on both productivity expectations is unknown.

**Unclear whose productivity expectations directors were to assess.** We also found RCS's survey questions on the positive and negative effects of productivity expectations on client care did not specify in the question wording whose expectations directors were to assess in their feedback, their own or the counselors they supervised. As a result, for two open-ended questions, it was unclear whether directors' feedback pertained to productivity expectations for counselors or their own expectations, which are different.

We analyzed directors' responses to the two open-ended questions about the positive and negative effects of productivity expectations on client care. For 48 percent of the 126 responses to the question about positive effects and 46 percent of the 127 responses to the question about negative effects, it was unclear whose expectations directors assessed in their feedback. RCS officials told us they intended for directors to provide feedback on either counselors' expectations, their own, or both. However, without knowing whether responses were about directors' or counselors' expectations, RCS may not be able to make informed decisions about potential changes to expectations.



The incomplete definition of productivity expectations and the lack of clarity in the wording of certain survey questions has led to RCS collecting information of limited quality for those questions. Thus, this information could be prone to misinterpretation, including a lack of understanding of which expectations and whose expectations counselors and directors assessed in their feedback.

The 2023 National Defense Authorization Act calls for VA to evaluate counselors' productivity expectations. In addition, the federal internal control standard for information and communication states that management should use quality information such that it is reasonably free from error and bias and faithfully represents what it purports to represent.<sup>3</sup> By clarifying that respondents should provide feedback on both of the productivity expectations for counselors, RCS could collect information that may help it to better understand counselors' and directors' perspectives on those expectations. RCS could then use that information to make any changes to productivity expectations to help ensure counselors and directors are providing quality services to veterans as well as maintaining their own well-being.

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### **Has RCS made any changes to counselor productivity expectations based on feedback from the survey?**

As of April 2025, RCS officials had not identified any changes they plan to make to counselors' productivity expectations based on feedback from the 2023 survey.

However, RCS officials told us that feedback from the survey has informed ongoing process improvement efforts for Vet Center operations. For example, RCS officials said they have four projects aimed at reducing the administrative burden for counselors and directors. Sixty-two percent of survey respondents reported administrative burden as a challenge that directly impeded their ability to provide direct client services in the 2023 survey.

One project an RCS official described was to change data entry procedures for tracking clinical consultations (counselors' discussions with external consultants, who are licensed mental health professionals) about potential care for complex cases. According to this RCS official, the completion of this project will result in time savings for counselors and directors by helping to reduce administrative tasks. In turn, this may help counselors and directors more easily meet their productivity expectations.

Additionally, RCS implemented a training project to improve Vet Center directors' understanding and communication of counselor productivity. RCS officials stated that such efforts have resulted in an improvement of directors' knowledge of counselors' productivity expectations.

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### **What additional surveys has RCS conducted or planned?**

RCS administered a second *Counselor and Client Engagement Survey* from January 6 through January 24, 2025. RCS officials said this was in response to the 2023 National Defense Authorization Act, which calls for VA to obtain feedback from counselors on productivity expectations annually. Officials told us they administered the survey in January 2025 instead of December 2024 in an effort to improve the survey's response rate. RCS officials said they plan to administer a third survey to counselors and directors by the end of March 2026.

The overall response rate for the 2025 survey was 32 percent, which included 29 percent of counselors and 40 percent of directors. This was slightly lower than the response rate for the 2023 survey that had an overall response rate of 37 percent. RCS encouraged survey participation in 2025 using the same methods it used in 2023, including weekly reminders and an assurance to counselors and

directors regarding the confidentiality of their responses. The invitation sent to counselors and directors for the 2025 survey also included examples of how RCS had used the feedback from the 2023 survey. As of April 2025, RCS officials told us they were in the process of analyzing the feedback.

The productivity expectations definition was the same in the 2025 survey. The questions in the 2025 survey were mostly unchanged from 2023, although RCS made a few adjustments. In particular, RCS revised questions on respondent characteristics and open-ended questions on the effects of productivity expectations.

**Changes to questions on respondent characteristics.** RCS officials told us they revised the questions about the district and zone of each respondent's Vet Center to help ensure they could more accurately capture the respondents' geographic areas. Each Vet Center is assigned to one of five geographic-based districts that are further subdivided into zones. Officials said that having more accurate information on districts and zones of respondents will enable them to analyze the data by geographic area, which they were unable to do for the 2023 survey. They also said this will allow them to better identify themes from the responses that may be specific to a particular geographic area.

**Changes to open-ended questions about the effects of productivity expectations.** RCS consolidated the four open-ended questions from the 2023 survey about any positive or negative effects of productivity expectations into two questions. RCS officials told us they changed the open-ended questions for the 2025 survey due to difficulty determining if effects reported in the 2023 survey were more negative or positive overall.

The 2023 survey asked for positive effects of productivity expectations in one question and negative effects separately in another question. Most respondents provided answers to both questions, which officials said made it hard to determine if the respondents' experiences with productivity expectations were positive or negative overall. Having one question in the 2025 survey that asks respondents to specify whether the effect is positive, negative, or neither before having the respondents provide further explanation in free text will help ensure that RCS can determine the overall direction of the effects, according to RCS officials.

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## Conclusions

Vet Centers play an important role in helping veterans and service members readjust to civilian life or to continued military service. RCS has established productivity expectations for Vet Center counselors and directors. Through its surveys of Vet Center counselors and directors, RCS has the opportunity to collect information that may assist its understanding of potential effects of productivity expectations on client care and counselor well-being.

However, the overall response rates for the surveys raise questions about the degree to which the feedback RCS obtained represents the views of all counselors and directors. By conducting a nonresponse bias analysis, RCS could identify potential sources of nonresponse and then, as appropriate, take steps to improve response rates in any underrepresented groups in subsequent surveys. Such steps would increase the likelihood of representative survey findings.

In addition, we found a lack of clarity in the 2023 survey that resulted in information of limited quality. For example, it is unclear whether respondents were assessing expectations for time management or encounters and whether directors were providing feedback on their own productivity expectations or those of the counselors they supervised.

Modifying the survey to clearly solicit feedback from counselors and directors on both productivity expectations for counselors will improve the quality of information in future annual versions. In turn, RCS could use this information to inform any needed changes to productivity expectations going forward. Such changes could support the provision of quality care to veterans, service members, and their families, and help ensure the well-being of Vet Center counselors and directors.

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## Recommendations for Executive Action

The Under Secretary for Health should ensure the RCS Chief Officer analyzes the potential for nonresponse bias in the *Counselor and Client Engagement Survey* and, as appropriate, develops strategies to increase the likelihood of representative survey findings. (Recommendation 1)

The Under Secretary for Health should ensure the RCS Chief Officer modifies the *Counselor and Client Engagement Survey* to clarify that counselors and directors should provide feedback on both the time management and the encounters productivity expectations for counselors. (Recommendation 2)

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## Agency Comments

We provided a draft of this product to VA for review and comment. In its comments, reproduced in appendix II, VA concurred with our recommendations, and identified steps it plans to take to implement them. VA also provided technical comments that we incorporated as appropriate.

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## How GAO Did This Study

To examine the feedback VHA obtained on Vet Center productivity expectations, we obtained and reviewed documentation and interviewed RCS officials. Specifically, we reviewed information on RCS's processes for designing and administering its *2023 Counselor and Client Engagement Survey*, its subsequent analysis of survey responses, and how officials have used or plan to use the feedback collected. We also reviewed RCS's communications to counselors and directors about the survey and the report it submitted to Congress in July 2024 detailing the feedback it received from the 2023 survey.

In addition, we interviewed officials from VHA's National Center for Organization Development about the technical assistance they provided RCS in the design of the survey and their role in collecting, storing, and analyzing survey responses. We reviewed the 2023 survey data, calculated overall and individual question response rates, and compared this information to the results RCS included in its July 2024 report to Congress. We assessed RCS's December 2023 survey against federal statistical policies, the 2023 National Defense Authorization Act provision that RCS obtain feedback from counselors on productivity expectations, and the federal standard for internal control for information and communication.<sup>4</sup>

We also reviewed documentation and interviewed officials from RCS about the 2025 survey, including any changes to its design and administration compared to the 2023 survey. We reviewed RCS's 2025 survey questionnaire and the report of aggregated 2025 survey responses that VHA's National Center for Organization Development provided to RCS. We also interviewed RCS officials about RCS's plans for future surveys in response to the 2023 National Defense Authorization Act.

We conducted this performance audit from June 2024 to June 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence



obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

List of Addressees

The Honorable Jerry Moran  
Chairman  
The Honorable Richard Blumenthal  
Ranking Member  
Committee on Veterans’ Affairs  
United States Senate

The Honorable Mike Bost  
Chairman  
The Honorable Mark Takano  
Ranking Member  
Committee on Veterans’ Affairs  
House of Representatives

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We are sending copies of this report to the appropriate congressional committees, the Secretary of Veterans Affairs, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

GAO Contact Information

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Appendix I: 2023 Counselor and Client Engagement Survey Questions

In response to the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (2023 National Defense Authorization Act), the Veterans Health Administration’s Readjustment Counseling Service solicited feedback on the ways in which productivity expectations may have affected client care and counselor welfare. This appendix provides the full list of the survey questions with corresponding related topics in the 2023 National Defense Authorization Act. (See table 2.)

Table 2: RCS’s 2023 Counselor and Client Engagement Survey Questions and Related Topics from the 2023 National Defense Authorization Act

2023 National Defense Authorization Act topics	Survey questions
Effects of productivity expectations on client care and welfare of counselors	What positive effects do productivity expectations have on client care? (open-ended)

2023 National Defense Authorization Act topics	Survey questions
	What negative effects do productivity expectations have on client care? (open-ended)
	What positive effects do productivity expectations have on the welfare of readjustment counselors/directors? (open-ended)
	What negative effects do productivity expectations have on the welfare of readjustment counselors/directors? (open-ended)
Effect of productivity expectations on counselor recruitment, retention, and welfare	Do productivity expectations positively or negatively affect recruitment of readjustment counselors? (multiple choice)
	Do productivity expectations positively or negatively affect retention of readjustment counselors? (multiple choice)
Distances counselors travel to appointments	On average each week, how much drive time do you spend traveling to provide counseling services to clients at locations that are away from your Vet Center (i.e., community access points)? (multiple choice)
	On average each week, how many miles do you travel to provide counseling services to clients at locations that are away from your Vet Center (i.e., community access points)? (multiple choice)
	How many urban/rural/highly rural locations outside of the Vet Center do you provide counseling services (i.e., community access points)? (sliding scale)
Clients' potential interest in and benefit from using telehealth or group counseling services	What percentage of clients you work with express an interest in using telehealth services? (sliding scale)
	Veterans, service members, and their families at my Vet Center participate in group counseling. (Yes/No)
	Veterans, service members, and their families at my Vet Center benefit from group counseling. (Yes/No)
	If yes, please provide group(s) that you have found to be beneficial for veterans, service members, and their families. (multiple choice, select all that apply)
Client access to broadband and telehealth	If your clients were to want telehealth, what percentage have access to adequate internet services? (sliding scale)
Training for directors and counselors about how productivity expectations are calculated	(Counselors only) Check all that apply regarding productivity training (multiple choice): <i>I have/have not received training from my director/my District and do/do not understand productivity expectations</i>
	(Directors only) Check all that apply regarding productivity training (multiple choice): <i>I have/have not received training from my District and do/do not understand productivity expectations for Veteran Outreach Program Specialists/Counselor/myself.</i>
	(Directors only) I feel comfortable communicating productivity expectations to: (multiple choice, select all that apply)
Effect of productivity expectations on counselors' ability to accurately report client visits	Rate your belief on the impact productivity expectations have on your ability to document and report services in an accurate manner. (multiple choice)
	Rate your belief on the impact productivity expectations have on your ability to document and report services in a timely manner. (multiple choice)
Other topics, as appropriate	Which of the following challenges directly impede your ability to provide direct services? (select all that apply)
	Do you feel that you have adequate resources related to: Clinical Consultation (Yes/No); Clinical Supervision (Yes/No); Training in position – relevant to clinical skills (Yes/No)

Source: GAO analysis of James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (2023 National Defense Authorization Act) and Veterans Health Administration's Readjustment Counseling Service (RCS) survey documentation. | GAO-25-107631

## Appendix II: Comments from the Department of Veterans Affairs



DEPARTMENT OF VETERANS AFFAIRS  
WASHINGTON

July 10, 2025

Ms. Alyssa M. Hundrup  
Director  
Health Care  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Dear Ms. Hundrup:

The Department of Veterans Affairs (VA) reviewed the Government Accountability Office (GAO) draft report: ***VA VET CENTERS: Opportunities to Improve Survey of Counselor Productivity Expectations*** (GAO-25-107631).

The enclosure contains technical comments and the action plan to implement the draft report recommendations. VA appreciates the opportunity to comment on your draft report.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Syrek".

Christopher D. Syrek  
Chief of Staff

Enclosure

Department of Veterans Affairs (VA) Responses and Technical Comments  
to the Government Accountability Office (GAO) Draft Report  
**VA VET CENTERS: Opportunities to Improve Survey of  
Counselor Productivity Expectations**  
(GAO-25-107631)

**Recommendation 1:** The Under Secretary for Health should ensure the RCS Chief Officer analyzes the potential for nonresponse bias in the *Counselor and Client Engagement Survey* and, as appropriate, develops strategies to increase the likelihood of representative survey findings.

**VA Response:** Concur. Readjustment Counseling Service (RCS) agrees that a process to analyze the potential for nonresponse bias in the Counselor and Client Engagement Survey is an important part of ensuring an accurate understanding of survey findings for use in future action planning. RCS does not have expertise organic to the organization to perform this analysis and will work to identify partnering program offices or external resources to accomplish this task. RCS has completed the requirements for the fiscal year (FY) 2025 Counselor and Client Engagement Survey process as of the publishing of this report and will work to include these new processes in the FY 2026 cycle as a part of the survey analysis process. RCS is targeting second quarter (Q) FY 2026 for the next survey administration and anticipates completing the respective analysis, including this identified area of focus, in Q3 FY 2026.

Target Completion Date: Q3 FY 2026.

**Recommendation 2:** The Under Secretary for Health should ensure the RCS Chief Officer modifies the *Counselor and Client Engagement Survey* to clarify that counselors and directors should provide feedback on both the time management and the encounters expectations for counselors.

**VA Response:** Concur. RCS recognizes the importance of accurate and clearly defined survey questions and appreciates the constructive feedback for improvements in these areas. RCS plans to amend the survey questions and focus areas to ensure it is clear to the counselor and the Vet Center Director respondents to include responses on the time management and the encounter expectations for counselors. These changes will be incorporated into the FY 2026 Counselor and Client Engagement Survey. RCS is targeting Q2 FY 2026 for the next survey administration.

Target Completion Date: Q2 FY 2026.

## Endnotes

<sup>1</sup>Pub. L. No 117-263, § 5126(a), 136 Stat. 2395, 3213-3215 (2022).

<sup>2</sup>The Chief Statistician of the United States within the Office of Management and Budget provides leadership on standards and guidelines for federal statistical agencies and their activities, which covers guidelines for conducting an assessment of survey nonresponse, among other things. See U.S. Office of Management and Budget, *Standards and Guidelines for Statistical Surveys*, Statistical Policy Directive No. 2 (Washington, D.C.: Sept. 2006).

<sup>3</sup>Internal control is a process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved. See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>4</sup>See U.S. Office of Management and Budget, *Standards and Guidelines for Statistical Surveys*, Statistical Policy Directive No. 2 (Washington, D.C.: Sept. 2006); Pub. L. No 117-263, § 5126(a), 136 Stat. at 3213-3215; [GAO-14-704G](#).