

# Analysis of Veterans Florida's Workforce Training Grant and Entrepreneurship Programs

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# **Executive Summary**

### **Background and Purpose**

Veterans Florida<sup>1</sup> was created to "... promote Florida as a veteran-friendly state that seeks to provide veterans with employment opportunities and that promotes the hiring of veterans by the business community..."<sup>2</sup>

Legislation enacted in 2014 directs the Office of Economic and Demographic Research (EDR) to analyze and evaluate the Veterans Florida's Workforce Training Grant and Entrepreneurship programs.<sup>3</sup> EDR is required to evaluate the economic benefits of each program, the number of jobs created, the increase or decrease in personal income, and the impact on state gross domestic product from the direct, indirect, and induced effects of the state's investment. Economic Benefit is defined as "the direct, indirect, and induced gains in state revenues as a percentage of the state's investment" – which includes "state grants, tax exemptions, tax refunds, tax credits, and other state incentives." For the purpose of this report, the term Return on Investment (ROI) is synonymous with economic benefit, and is used in lieu of the statutory term.

# **Explanation of Return-on-Investment**

The ROI is developed by summing state revenues generated by a program less state expenditures invested in the program, and dividing that calculation by the state's investment. It is most often used when a project is to be evaluated strictly on a monetary basis, and externalities and social costs and benefits—to the extent they exist—are excluded from the evaluation. The basic formula is:

# (Increase in State Revenue – State Investment) State Investment

Since EDR's Statewide Model is used to develop these computations and to model the induced and indirect effects, EDR is able to simultaneously generate State Revenue and State Investment from the model so all feedback effects mirror reality. The result (a net number) is used in the final ROI calculation.

As used by EDR for this analysis, the returns can be categorized as follows:

- **Greater Than One (>1.0)**...the program more than breaks even; the return to the state produces more revenues than the total cost of the investment.
- **Equal To One (=1.0)...**the program breaks even; the return to the state in additional revenues equals the total cost of the investment.
- Less Than One, But Positive (+, <1)...the program does not break even; however, the state generates enough revenues to recover a portion of its cost of the investment.

<sup>&</sup>lt;sup>1</sup> Veterans Florida is the "doing business as" name of Florida is for Veterans, Inc., the corporation designated in Section 295.21(1), F.S.

<sup>&</sup>lt;sup>2</sup> Section 12, Ch. 2014-01, L.O.F., which created Section 295.21(2), F.S.

<sup>&</sup>lt;sup>3</sup> Section 6, Ch. 2014-1, L.O.F., Section 288.0001(2)(d), F.S. While these programs were created in 2014, they were not fully implemented until 2016. Because of this delay, EDR considers program expenditures for the most recent fiscal years for which program data is available, Fiscal Years 2015-16, 2016-17, and 2017-18.

• Less Than Zero (-, <0)...the program does not recover any portion of the investment cost, and state revenues are less than they would have been in the absence of the program, typically because taxable activity is shifted to non-taxable activity.

The numerical ROI can be interpreted as the return in tax revenues for each dollar spent by the state. For example, a ROI of 2.5 means that \$2.50 in tax revenues is received back from each dollar spent by the state.

The basic formula for ROI is always calculated in the same manner, but the inputs used in the calculation can differ depending on the needs of the investor. Florida law requires the return to be measured from the state's perspective as the investor, in the form of state tax revenues. In this regard, the ROI is ultimately shaped by the state's tax code.

# **Evaluation Considerations**

EDR is charged with evaluating the Workforce Training Grant and Entrepreneurship programs in the same way it evaluates other state economic development programs. To enable this evaluation, Veterans Florida provided related state program expenditures and project information regarding the economic output generated by recipient businesses, primarily from job creation and increases in business revenue.

As with previous evaluations, EDR's approach to the calculation of ROI is based on the net economic impact rather than the gross economic activity generated by or attributed to program projects. The impact is due to new economic activity induced by a state subsidy after taking account of what would have occurred in the absence of this particular investment. EDR employs a number of approaches to isolate the new economic activity, including an assessment of the "but-for" assertion<sup>4</sup> and culling "Market and Resource Dependent" projects.<sup>5</sup> The resulting net economic benefit may then be proportionately attributed to all project contributors. Culling "Market and Resource Dependent" projects and proportionally attributing the economic benefit are strategies used to derive a credible estimate of the programs' ROI.

To the extent it exists, the new activity generated by or attributed to Veterans Florida Workforce Training Grant and Entrepreneurship programs includes wage growth of trained employees, employment, and business capital investment associated with construction, renovation and purchase of equipment.

The statutory purpose and design of a program are also key considerations in its evaluation. The stated purpose of the Workforce Training Grant and Entrepreneurial programs is to "...assist in tailoring the

<sup>4</sup> This is the claim that "but for" the program subsidy, the initiation of economic activity would not have otherwise occurred – the incentive is the primary, or at least the determining factor, in business decisions. For the Veterans Florida Workforce Training Grant program, EDR does not consider whether employment of training-subsidized veterans displaces employment of similarly situated non-veterans, which would negate the "but for" assertion and the associated economic benefit of the subsidy. To some extent, culling "Market and Resource Dependent" projects addresses the "but-for" assertion.

<sup>&</sup>lt;sup>5</sup> Culling refers to removing the economic benefit of a particular project if it is determined to rely on Florida's markets or resources and would have existed in Florida in the absence of the incentive. These are projects where the business' clients are predominantly based in Florida or the business is dependent on Florida's resources to produce its products or services. (General examples of market dependent projects include retail establishments and distribution centers.) Any new activity induced by the incentives simply displaces other employment and economic activity that would have occurred in the absence of the incentive. There is no net economic expansion, as one of two events occurs: (1) existing businesses shed jobs as their market share decreases; or, (2) a competitor that would have filled the same vacuum without receiving an incentive is displaced. In these cases, neither economic benefits nor a return to the state should be assigned to the projects.

training of veterans to match the needs of the employment marketplace, and enhance the entrepreneurial skills of veterans." There are likely benefits to businesses and individuals participating in these programs that are by-products of the economic development incentives, but do not contribute directly to the state's revenues. Because of this, the ROI is but one measure of program success.

### **Overall Results and Conclusions**

The Veterans Florida Workforce Training Grant program funds "...customized, skills-based curriculum development and training, through partial reimbursement, to businesses in Florida's targeted, high-growth and high-wage industries..." Grants were awarded to training providers selected by the businesses, for up to 48 months of training for newly-hired employees, capped at \$8,000 per trainee. The Legislature appropriated \$4 million for the entire period running from FY 2014-15 through FY 2017-18. Of that amount, \$1.2 million in grant funds were awarded to businesses from FY 2015-16 through 2017-18, and \$394,001 was retained by Veterans Florida for program-related administrative costs.

The Entrepreneurship Program has three components, two of which are unlikely to result in an initial, quantifiable impact on the economy. The first program tier makes available an on-going, self-paced, online introduction to entrepreneurship. The second tier offers periodic workshops through Network Partners under contract with Veterans Florida. Both tiers are available to any veteran interested in exploring entrepreneurship and identifying resources to start a business.

It is in the third stage that selected entrepreneurs with vetted business ideas or young companies are provided an intensive program of instruction by Network Partners and mentors to facilitate the establishment or growth of their businesses. While the first and second program tiers accomplish identified program purposes, EDR's analysis is limited to the third tier, where measurable economic activity is captured and reported by Veterans Florida.

In total, the Legislature appropriated \$2 million for the entire period running from FY 2014-15 through FY 2017-18. Of that amount, \$1.55 million was reimbursed to Network Partners during FY 2015-16 through 2017-18 for contracted services and \$325,902 was retained by Veterans Florida for program-related administrative costs.

Overall, the Workforce Training Grant program fails the "but for" test that would allow an assumption that trainees would not be employed, underemployed or underpaid but for the existence of this program. This is because the program duplicates other programs that are equally available to the trainees. Further, even if this test were passed, the static impact of the Workforce Training Grant program is only slightly positive and insignificant. However, this small positive impact is offset by the economic cost of unspent appropriated funds that were taken out of Florida's economy without productive use. Consequently, the ROI would be negative.

<sup>&</sup>lt;sup>6</sup> Section 295.21(2), F.S.

<sup>&</sup>lt;sup>7</sup> Economic development incentives are public subsidies intended to induce an economic activity or capital investment by a private business in a jurisdiction in which such activity or investment would not otherwise take place. For these programs, there is no pre-award assessment of the "but-for" assertion, and evaluation of potential job creation or capital investment and projected ROI to the state. For a discussion of other factors affecting ROI, see EDR's PowerPoint Presentation "Return on Investment in Florida Practice" <a href="http://edr.state.fl.us/Content/returnoninvestment/ROI InFloridaPractice.pdf">http://edr.state.fl.us/Content/returnoninvestment/ROI InFloridaPractice.pdf</a>

<sup>8</sup> http://www.veteransflorida.org/wp-content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf

<sup>&</sup>lt;sup>9</sup> The program was amended in 2018 to reduce the maximum term of a training grant from 48 to 12 months and to expand the use of grant funds to training current employees who are veterans.

The estimated negative ROI of this program is the result of a combination of factors: the delay in program implementation, which resulted in unspent appropriations; lack of wage appreciation of trainees; and inadequate economic performance due to program design and redundancy with better performing, publicly-funded programs. <sup>10</sup> A program redesign to either better leverage existing program functionality or limit Workforce Grants to trainees hired for newly created high-wage jobs in Florida's targeted industries would result in greater economic returns.

For the Entrepreneurship Program, this review estimates the static impact to be positive, though insignificant with little to no induced or indirect activity at this time. A longer review period, as well as detailed tracking of the capital investments made by the businesses participating in the program, may reveal greater economic returns at the next review.

<sup>&</sup>lt;sup>10</sup> See "Economic Evaluation of CareerSource Florida's Training Program," December 31, 2018. Office of Economic and Demographic Research, December 31, 2018. <a href="http://edr.state.fl.us/Content/returnoninvestment/ROI-CareerSourceFlTrainingProg.pdf">http://edr.state.fl.us/Content/returnoninvestment/ROI-CareerSourceFlTrainingProg.pdf</a>

# Veterans Florida's Grant and Entrepreneurship Programs

### **Veterans Florida**

In 2014, Veterans Florida was created as a nonprofit corporation within the Florida Department of Veterans' Affairs to:

"... promote Florida as a veteran-friendly state that seeks to provide veterans with employment opportunities and that promotes the hiring of veterans by the business community... encourage retired and recently separated military personnel to remain in the state or to make the state their permanent residence.... promote the value of military skill sets to businesses in the state, assist in tailoring the training of veterans to match the needs of the employment marketplace, and enhance the entrepreneurial skills of veterans." <sup>11</sup>

Veterans Florida is governed by a nine-member board of directors, appointed by the Governor, the President of the Senate, and the Speaker of the House of Representatives. These members and corporation staff are subject to statutory standards of conduct for public officers, restrictions on employment of relatives, and voting conflicts. The corporation is subject to the statutory provisions relating to public records and meetings. <sup>12</sup>

Veterans Florida is charged to:

• Conduct research to identify the educational and employment needs of veterans; 13

<sup>11</sup> Section 12, Ch. 2014-01, L.O.F., which created Section 295.21(2), F.S. <a href="http://laws.flrules.org/2014/1">http://laws.flrules.org/2014/1</a> Enterprise Florida offers this assessment of the value of veterans to the Florida economy:

With over 1.5 million veterans and nearly 200,000 military retirees, Florida maintains the 3rd and 2nd largest veteran and retiree population in the U.S., respectively. In addition to the \$18 Billion in transfer payments these special populations attract to the state annually, veterans and military retirees provide a competitive advantage to Florida's workforce. Due to their knowledge, skills, and leadership abilities, many national firms, such as Amazon, focus on hiring former military. High concentrations of veterans and military retirees can act as business recruitment tools for states and local economic development organizations. Florida maintains a veteran population 20% more concentrated than the U.S. and a military retiree population that is 50% more concentrated – thus making Florida a highly desirable state for businesses to expand and/or relocate due to its workforce competitiveness.

Florida Defense Factbook, December 2017. p.42. <a href="https://www.enterpriseflorida.com/wp-content/uploads/Florida-Defense-Factbook-2017-1.pdf">https://www.enterpriseflorida.com/wp-content/uploads/Florida-Defense-Factbook-2017-1.pdf</a>

See report APPENDIX for an "Inventory of State-Funded Benefit for Veterans and Servicemembers, and their Dependents" for programs and services offered by other state agencies.

<sup>12</sup> Section 12, Ch. 2014-01, L.O.F., which created Section 295.21(2), F.S. http://laws.flrules.org/2014/1

Veterans Florida may be considered a Private Organization with Public Purposes (POPP), which may be any public/private entity that is created, or that is authorized to be created, by general law to: (a) operate programs for or to provide services to, or on behalf of, a state governmental entity; (b) to provide benefits to or on behalf of a state governmental entity; or (c) to provide assistance or support to or on behalf of a state governmental entity. See "Model Contracted Services Corporation," IPR 98-25, The Florida Senate. <a href="http://archive.flsenate.gov/data/Publications/1998/Senate/reports/interim\_reports/pdf/98-25go.pdf">http://archive.flsenate.gov/data/Publications/1998/Senate/reports/interim\_reports/pdf/98-25go.pdf</a>
POPPs may also be referred to as Public-Private Partnerships (PPPs), which generally include contractual agreements under which the public and private sectors collaborate to provide a public good, be it a facility or service. Veterans Florida is entirely funded by the state and does not receive private financial support. Veterans Florida is not require to contract with the Florida Department of Veterans' Affairs; however, the Department is authorized to contract with Veterans Florida for use of the department's property, facilities, or personnel services. The provision governing Veterans Florida is similar to provisions governing CareerSource Florida in Section 445.004(1), F.S.

<sup>13</sup> Veteran is defined in Section 1.01(14), F.S., as a person who served in the active military, naval, or air service and who was discharged or released under honorable conditions or who later received an upgraded discharge under honorable conditions. The term is undefined in Sections 295.21 and 295.22, F.S., and does not reference the definition in Section 1.01(14), F.S. Veterans Florida has adopted an inclusive definition of the term, to include military reservists, National Guard servicemembers,

- Advise the Florida Tourism Industry Marketing Corporation (VISIT Florida) on the development and implementation of a marketing campaign to encourage veterans to remain in the state or to make the state their permanent residence;<sup>14</sup>
- Promote and enhance the value of military skill sets to businesses; and
- Submit an annual progress report and work plan by to the Governor, the President of the Senate, and the Speaker of the House of Representatives.

Additionally, Veterans Florida is required to administer the Veterans Employment and Training Services (VETS) program, <sup>15</sup> which requires it to:

- Conduct marketing and recruiting efforts directed at veterans residing in or interested in relocating to this state and who are seeking employment;
- Assist veterans who reside in or relocate to this state and who are seeking employment by
  offering personal assistance with skills assessments, establishing employment goals, resume
  preparation, referrals to career centers, and applying for employment;<sup>16</sup>
- Assist Florida businesses in recruiting and hiring veterans;
- Create a grant program to provide funding to assist business seeking to hire veterans who need assistance with workforce skills;<sup>17</sup> and
- Contract with one or more entities to administer an entrepreneur initiative program for veterans in this state.<sup>18</sup>

# **Veterans Florida Workforce Training Grant Program**

The Veterans Florida Workforce Training Grant program provides "funding to assist veterans in meeting the workforce-skill needs of businesses seeking to hire veterans." These grants provide funding for:

"...customized, skills-based curriculum development and training, through partial reimbursement, to businesses in Florida's targeted, high-growth and high-wage industries

and all veterans regardless of their discharge conditions, living in or desiring to move to Florida. To participate in the Business Training or Entrepreneurship programs, veterans must be Florida residents.

<sup>&</sup>lt;sup>14</sup> Additionally, Enterprise Florida is required to provide information about Veterans Florida "and its services to prospective, new, expanding, and relocating businesses seeking to conduct business in this state…and to the greatest extent possible, collaborate with the corporation (Veterans Florida) to meet the employment needs, including meeting the job-creation requirements, of any business receiving assistance or services from Enterprise Florida, Inc." (Section 295.22(4), F.S.)

 $<sup>^{\</sup>rm 15}$  Section 295.22(3), F.S. The VETS program is now referred to as the Career Service Program.

<sup>&</sup>lt;sup>16</sup> One tool used to implement this requirement is the Veterans Florida Career Portal, which allow veterans to submit their resume, search and apply for jobs with companies that Veterans Florida has approved to receive Business Training Grants.

<sup>&</sup>lt;sup>17</sup> Hereafter referred to as the Workforce Training Grant program. The program was expanded in 2018 to allow training grants be awarded to businesses that promote and improve skills of veterans, rather than only to businesses that hire veterans. Section 4, Ch. 2018-7, L.O.F. Veterans Florida staff state that this expansion allows them to address the "underemployment" of current employees who are veterans.

<sup>&</sup>lt;sup>18</sup> Hereafter referred to as the Entrepreneurship program.

<sup>&</sup>lt;sup>19</sup> Section 295.22(3)(d), F.S. A veteran employee for the purposes of this program is defined as an individual who is eligible to legally work in the U.S.; is a Florida resident working at a physical location in Florida; and has verifiable military service with a DD-214 or is a current or former member of the Florida National Guard with a letter from their commander.

P. 3 http://www.veteransflorida.org/wp-content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf

(specifically, target industry businesses). These are high-skill industries producing goods or services and wages generally 125 percent above state or local wages."20

From FY 2015-16 through 2017-18, grants were awarded for up to 48 months of training for Florida resident, full-time employees. 21 Trainers were selected by the businesses. If grant funds were used to provide a technical certificate, a licensure, or a degree, the training entity had to be properly accredited and licensed. Grants were only awarded in the absence of available veteran-specific federally funded programs.

Grants were limited to \$8,000 per trainee, and only used for:

- tuition and fees;
- curriculum development;
- books and classroom materials;
- rental fees for facilities at public colleges and universities, including virtual training labs; and
- overhead or indirect costs not to exceed 5 percent of the grant amount.

Allocation of the grant was contingent upon a grant agreement, which included identification and qualification of the instructors, the parties responsible for paying the instructors, and the duration of the instructional program. The agreement also specified the amount and type of funding match from the business and identified all direct, training-related costs. Grants were equal to fifty-percent of the eligible training costs, up to \$8,000. Finally, the agreement included "permission to access aggregate information specific to the wages and performance of participants upon the completion of instruction for evaluation purposes... provided that any evaluation published subsequent to the instruction will not identify the employer or any individual participant."22

Veterans Florida states that the "...program is designed to increase the competitiveness of Florida businesses in the global economy by providing a trained, skilled workforce from the pool of Florida's military veteran population."23

See Veterans Florida Promotes Florida as a Veteran-Friendly State and Provides Numerous Services; Performance Measurement and Outreach Could Be Improved, OPPAGA Report No. 18-04, February 2018, p. 4. http://www.oppaga.state.fl.us/MonitorDocs/Reports/pdf/1804rpt.pdf

<sup>&</sup>lt;sup>20</sup> Ibid. "Targeted industries" are high growth, recession resistant, and market independent industries as designated by Enterprise Florida, Inc., and the Department of Economic Opportunity pursuant to the statutory parameters in Section 288.106(2)(q), F.S. Retail and Hotel/Restaurants are specifically excluded in the definition of this term.

<sup>&</sup>lt;sup>21</sup> An eligible trainee may initially be a temporary employee or independent contractor provided he or she converts to a permanent and full-time employee within a reasonable amount of time as determined by Veterans Florida. In 2018, OPPAGA noted the following:

Two types of BTG grant awards have been funded since program inception: legacy contracts and business certifications. During Fiscal Year 2015-16, businesses were awarded contracts, and beginning in September of Fiscal Year 2016-17, businesses instead received certifications. Contracts and certifications have slightly different operating criteria. Under the legacy contracts, businesses were awarded two-year contracts for a maximum reimbursement of \$200,000 that is reimbursed quarterly for veterans trained and hired. Under the certifications, businesses are reimbursed on a rolling basis, within the same fiscal year, but are still subject to an annual reimbursement cap of \$100,000. Veterans Florida reports that this change allows them to reimburse grant recipients more efficiently and distribute grant funds to a larger number of companies. p.4.

<sup>&</sup>lt;sup>22</sup> Section 295.22(3)(d)3.f., F.S.

<sup>&</sup>lt;sup>23</sup> P. 2 http://www.veteransflorida.org/wp-content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf

The business awarded a Veterans Florida Workforce Training Grant may also receive a Quick-Response Training Program grant from CareerSource Florida, Inc. (CSF), for the same veteran-trainee. CSF is authorized to contract as the grant administrator for both programs.

The program was amended in 2018 to:

- Expand the qualified use of grant funds to allow training grants be awarded to businesses that promote and improve skills of veterans, rather than only to businesses that hire veterans;
- Delete the provision that limits grant funds only to training providers, whether as selected by the business or provided by an "in-house training provider of the business."
- Reduce the maximum term of a training grant from 48 to 12 months; and
- Revise the training-related activities eligible for reimbursement and the elements of the grant agreement.<sup>24</sup>

Annual funding for the Workforce Training Grant program is provided by the Florida Legislature, with a total of \$4 million appropriated during the period running from FY 2014-15 through FY 2017-18.

# **Veterans Florida Entrepreneurship Program**

The Veterans Florida Entrepreneurship Program offers tuition-free, online and on-campus instruction to qualified veterans.<sup>25</sup> The current version of the program is described as:

"...a comprehensive entrepreneurship program implemented across a network of partner entities across Florida (that)... consists of a self-paced online module, periodic on premise workshops, and a cohort-based class for a carefully selected small group of veteran entrepreneurs. All portions of the program are ... designed to introduce veterans to entrepreneurship education appropriate for their abilities and the stage of their business idea..." <sup>26</sup>

The first portion or program tier provides an on-going "self-paced, online entrepreneurship course that serves veterans at the early stages of contemplating entrepreneurship." This program tier serves as a "feeder and lead generator" for the other tiers of the program.<sup>27</sup>

The second and third tiers are implemented by competitively selected local "Network Partners" under contract with Veterans Florida. In the past, these entities were required to be public or private universities with military and veteran resource centers and regional partners of the Florida Small

<sup>&</sup>lt;sup>24</sup> Section 4, Ch. 2018-7, L.O.F

<sup>&</sup>lt;sup>25</sup> Section 295.22(3)(e), F.S. The program is also available to Active Duty servicemembers (with 1 year left before discharge) and current or former members of the National Guard or Reserves. See <a href="http://www.veteransflorida.org/veterans/veterans-florida-entrepreneurship-program/">http://www.veteransflorida.org/veterans/veterans-florida-entrepreneurship-program/</a>

<sup>&</sup>lt;sup>26</sup> http://www.veteransflorida.org/wp-content/uploads/2018/04/Network-Partner-VFEP-RFP-2018-19-1.pdf Also see http://www.veteransflorida.org/veterans/veteransflorida-entrepreneurship-program/

<sup>&</sup>lt;sup>27</sup> Veterans Florida uses Bunker Labs online entrepreneurship challenge, a fourteen stage program guiding participants through three levels of training. See "Bunker in a Box" @ <a href="https://bunkerlabs.org/about-the-bunker/">https://bunkerlabs.org/about-the-bunker/</a> and <a href="http://bunkerinabox.org/">https://bunkerlabs.org/about-the-bunker/</a> and <a href="https://bunkerinabox.org/">https://bunkerinabox.org/</a>? <a href="

Business Development Center Network. In 2018 the law was amended to remove these requirements, which allows a wider range of service providers. <sup>28</sup>

Network Partners are required, by contract, to:

- Promote the economic benefits of the program to the community and state through marketing and communications to the general public, local government officials, and internal and external stakeholders;
- Recruit veterans interested in entrepreneurship to attend monthly networking events, scheduled workshops or lectures and cohort-based classes;
- Collaborate with other network partners, Veterans Florida, and stakeholders throughout the duration of the program, including after-action reviews, to provide for a continually improving program;
- Implement the program according to the scope of work;
- Collect and report information about the veteran applicants, students, and their businesses, and measure student satisfaction through surveys and other feedback;
- Report activities, achievements, performance metrics, and quantitative data to Veterans Florida monthly and as requested;
- Identify additional local resources, such as business incubators or "co-working labs", small
  business or entrepreneur networking groups, or any online virtual tools, for
  entrepreneurial veterans; facilitate the use of these resources throughout the duration of
  course work and afterwards; and
- Identify local business leaders for inclusion as course instructors or veteran entrepreneur mentors.<sup>29</sup>

Network Partners are required to hold monthly networking and resource sharing meetings, and are encouraged to include local resource providers, vendors and successful entrepreneurs. These meetings are open to any interested veteran. Network Partners may also offer workshops on "tactical level business topics such as social media marketing, the basics of cloud-based accounting software, negotiation tactics, and other subjects that would be helpful for small business owners." Partners are authorized to charge reasonable fees for workshops, lectures and other events.

The third tier of the Entrepreneurship Program includes "intensive multi-week programs of instruction" in entrepreneurship for veterans "with vetted business ideas or young companies that need to accelerate growth." This instruction is designed for 10 to 15 "highly vetted participants" and may include non-veterans. Participants are also matched with mentors "that can dedicate significant time to helping program participants become successful entrepreneurs." Courses culminate with a "pitch" competition to a panel of judges. Network Partners are required to offer at least two cohort-based courses per year

<sup>&</sup>lt;sup>28</sup> Section 4, Ch. 2018-7, L.O.F. In FY 2018-19, Veterans Florida will partner with Florida Atlantic University, Florida Gulf Coast University, University of Central Florida, Action Zone, Tallahassee Community College and University of West Florida. At least two other state universities (Florida State and University of Florida) have entrepreneurship programs tailored to veterans within their broader entrepreneurship programs. See <a href="https://jmi.fsu.edu/">https://jmi.fsu.edu/</a> and <a href="https://jmi.fsu.edu/">https://jmi.fsu.edu/</a> center-for-entrepreneurship.

 $<sup>^{29}</sup>$  http://www.veteransflorida.org/wp-content/uploads/2018/04/Network-Partner-VFEP-RFP-2018-19-1.pdf bid.

and track participant's progress through the program. <sup>31</sup> To participate, veterans are required to pay an enrollment fee of \$250 to Veterans Florida.

Annual funding for the Entrepreneurship programs is provided by the Florida Legislature, with \$2 million appropriated during the period running from FY 2014-15 through FY 2017-18.

<sup>&</sup>lt;sup>31</sup> Ibid. Network Partners may use their own curriculum, or curriculum developed by Co-Starters, for which Veterans Florida will pay for the licensing, training and material cost. <a href="https://costarters.co/">https://costarters.co/</a>

# **Analysis and Findings**

Veterans Florida is the source of data regarding Veterans Florida Workforce Training Grant and Entrepreneurship programs. From FY 2014-15 through FY 2017-18, the Florida Legislature appropriated a total of \$4 million to the Workforce Training Grant program and \$2 million to the Entrepreneurship program.

EDR requested that Veterans Florida provide the following information for each business receiving **Workforce Training Grants** for the 2015-16 through 2017-18 fiscal years: <sup>32</sup>

- Business identifying information; and
- An anonymized list of individual trainees completing training, identifying the:
  - Type of training provided;
  - Whether trainee filled a new or existing position;
  - Dates training started and completed;
  - Trainee wages at the start of training;
  - Trainee post-training wages;
  - Veterans Florida payment to business for training; and
  - The amount (dollar value) of business match to qualify for Veterans Florida payment
- Identification of the amount of payments for grants, funds used by Veterans Florida to administer the program, and the amount carried-over into (or re-appropriated to) the next year.

In response to EDR's request, Veterans Florida reported that \$1.2 million in grant funds (30 percent of all appropriated funds) were awarded to businesses as reimbursement for employee training costs, and \$394,001 (9.9 percent) was used by Veterans Florida for program-related administrative costs.<sup>33</sup> Over 60 percent of the funds were left unspent.

Veterans Florida reported grants to forty-nine businesses for training 349 veterans. Veterans Florida does not track whether these trainees filled new or existing job positions, which is an important factor in EDR's economic analysis of ROI.<sup>34</sup> Further, the reported trainee salaries increased after the training for only 19 of the 349 trainees (5.4 percent).<sup>35</sup> Veterans Florida does not survey businesses for subsequent salary increases.

Overall, the Workforce Training Grant program fails the "but for" test that would allow an assumption that trainees would not be employed, underemployed or underpaid but for the existence of this program. This is because the program duplicates other programs that are equally available to the trainees. Further, even if this test were passed, the static impact of the Workforce Training Grant

<sup>&</sup>lt;sup>32</sup> As previously noted, these programs were created in 2014, but were not fully implemented until 2016. Because of this delay, EDR considers program expenditures for the most recent fiscal years for which program data is available, Fiscal Years 2015-16, 2016-17, and 2017-18.

<sup>&</sup>lt;sup>33</sup> No grants were given in FY 2014-15, as the program was not fully implemented until FY 2015-16.

<sup>&</sup>lt;sup>34</sup> See the preceding "Evaluation Considerations" in Executive Summary.

<sup>&</sup>lt;sup>35</sup> Wage appreciation is the measure used by EDR to estimate the ROI for CareerSource Florida's Quick Response Training and Incumbent Worker Training programs.

Veterans Florida does not collect the Social Security Numbers for trainees, which precludes EDR from using Florida Education and Training Placement Information Program (FETPIP) to measure pre-training income with post-training income, or post-training income changes over time. FETPIP links individual identifiable data (social security numbers) from several different state administrative databases to track earnings, continuing education, and related outcomes.

program would be only slightly positive and insignificant. However, this small positive impact is offset by the economic cost of unspent appropriated funds that were taken out of Florida's economy without productive use. Consequently, the ROI would be negative.

For the Veterans Florida **Entrepreneurship Program**, EDR requested the number of program graduates, and the following information for each graduate creating a business, for the period running from FY 2015-16 through FY 2017-18:

- Business identifying information;
- Date business began operation;
- Total capital investments;
- Number of employees hired by these businesses; and
- Anonymized List of individual employees with the date of hire and their respective annual wage.

Veterans Florida reported that \$1.55 million (77.5 percent of all appropriated funds) was reimbursed to Network Partners for contracted services and \$325,902 (16.3 percent) was used by Veterans Florida for program-related administrative costs.<sup>36</sup> Nearly 94 percent of the appropriated funds were spent.

The Entrepreneurship Program has three components, two of which are unlikely to result in an initial, measurable impact on the economy. The first program tier makes available an on-going, self-paced, online introduction to entrepreneurship. The second tier offers periodic workshops through Network Partners under contract with Veterans Florida. Both tiers are available to any veteran interested in exploring entrepreneurship and identifying resources to start a business.

It is in the third stage that selected entrepreneurs with vetted business ideas or young companies are provided an intensive program of instruction by Network Partners and mentors to facilitate the establishment or growth of their businesses. While the first and second program tier accomplish identified program purposes, EDR's analysis is limited to the third tier, where measurable economic activity is captured and reported by Veterans Florida.

Veterans Florida reported 383 veterans graduated in the period covering FY 2015-16 through FY 2017-18. Veterans Florida regularly surveys all graduates to ascertain whether:

- They are in business;
- The business existed before or was started after participating in the program;
- The business has generated revenue after participating in the program and if so, how much;
- The business has hired employees and if so, how many; and
- Whether and how much capital they have invested in the business.

This information is maintained and updated with the most recent survey responses. (For the most recent program graduates, there is likely a lag before business activity is initiated and reported.)

Of the 383 graduates, 160 responded to Veterans Florida surveys (42 percent). Of the 160 respondents, 33 reported starting businesses after participation in the program, 15 of which reported revenues of \$3.5 million. These 15 businesses reported hiring 17 employees. Veterans Florida's survey does not ask for the annual wages of these employees. The reported capital investments capture the total amount

<sup>&</sup>lt;sup>36</sup> No reimbursements were made in FY 2014-15, as the program was not fully implemented until FY 2015-16.

invested in the business, but not the share of the capital investment associated with construction, renovation and purchase of equipment, which is an important factor in in EDR's analysis of ROI.<sup>37</sup>

From the list of 15 businesses reporting revenues, EDR evaluated whether the businesses were Florida Market Dependent. Nine of the 15 businesses were determined not to be market dependent and reported revenues of \$2,230,500 – \$2 million of which was from one business.

This review estimates that the static impact of the Entrepreneurship program is positive, though insignificant with little to no quantifiable indirect or induced activity at this time.

# **Program Features that Impact Program ROI, and Related Policy Considerations**

As previously noted, Veterans Florida was created to "... promote Florida as a veteran-friendly state" through a variety of prescribed programs and services, to include Workforce Training Grants and the Entrepreneurship Program.<sup>38</sup>

As noted in the previous section, a ROI is not possible for the Workforce Training Grants program. Even if it were possible to make this necessary assumption, the ROI would be negative. This is a result of a combination of factors: the delay in program implementation, which resulted in unspent appropriations, and a lack of wage appreciation of trainees. The Entrepreneurship Program was hampered by a lack of detailed capital investment reporting by the businesses.

The Veterans Florida Workforce Training Grant program funds "...customized, skills-based curriculum development and training, through partial reimbursement, to businesses in Florida's targeted, high-growth and high-wage industries (specifically, target industry businesses)..." Grants are awarded to training providers selected by the businesses, for up to 12 months of training, and are capped at \$8,000 per trainee. Until 2018, training grants were contingent upon hiring veterans and the training term was capped at 48 months.

Temporarily suspending the "but for" test necessary for creating a ROI, the Veterans Florida Workforce Training Grant may never result in a net gain in jobs, as grants are not conditioned upon creation of new jobs. 40 Further, in 2018 the Legislature removed the requirement that grants are contingent upon hiring veterans, thereby allowing grants be used to train current employees, provided they are military veterans. Veterans Florida staff state that this expansion allows them to address the "underemployment" of current employees who are veterans.

Overwhelmingly, these training grants do not result in high-wage jobs. Veterans Florida markets the grant program to "...businesses in Florida's targeted, high-growth and high-wage industries (qualified targeted industries). These are high-skill industries producing goods or services and wages generally 125

<sup>&</sup>lt;sup>37</sup> See the preceding "Evaluation Considerations" in Executive Summary.

<sup>&</sup>lt;sup>38</sup> Section 295.21(2), F.S. See report APPENDIX for an "Inventory of State-Funded Benefit for Veterans and Servicemembers, and their Dependents" for programs and services offered by other state agencies.

<sup>39</sup> http://www.veteransflorida.org/wp-

content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf p.2. "Targeted industries" are high growth, recession resistant, and market independent industries as designated by Enterprise Florida, Inc., and the Department of Economic Opportunity pursuant to the statutory parameters in s. 288.106(2)(q), F.S. Retail and Hotel/Restaurants are specifically excluded in the definition of this term.

<sup>&</sup>lt;sup>40</sup> EDR has not evaluated the extent to which employment of training-subsidized veterans displaces employment of similarly situated non-veterans. If this occurs, it offsets the economic benefit of the subsidy.

percent above state or local wages." However, Veterans Florida reports that 307 of the 349 trainees (88 percent) trained to date earned less than 60,000. (The targeted average statewide wage for "highwage" jobs was 60,569 for 2017.) Even more problematic, 204 of the 349 trainees (58.5 percent) were trained for the jobs paying 30,000 or less. 42

There are several reasons why this may be an acceptable outcome from a programmatic standpoint. First, the grant program is marketed to "high-wage industries" – not specifically to subsidize training for high-wage jobs. Also, high-wage jobs may be aspirational, as this is not a statutory requirement. Second, the preponderance of training provided for relatively low-skill, low-wage jobs may correspond to the workforce needs of Florida employers – low-to-middle skilled jobs and occupations with relatively high turnover rates. Third, the training may correspond to the quality of supply – available veterans with minimal marketable skills, experience or credentials seeking assistance. In this regard, there is likely a well-established recruiting pipeline for high-skilled veterans, especially those with high-security clearances, so businesses are less likely to seek job-placement or training assistance from Veterans Florida to fill many of the higher wage jobs. 43

The statute governing the grant program allows for bundling of grants with CareerSource Florida training grants.<sup>44</sup> Both CareerSource Florida and Veterans Florida staff state they do not know whether or not, or to what extent this feature is used. In 2018, OPPAGA reported that four of the ten businesses responding to their survey:

"...reported that they used other grant programs such as Regional Workforce Board On-the-Job Training or Employed Worker Training programs, and CareerSource Florida Quick Response Training or Incumbent Worker Training programs during the same period in which they received the Business Training Grants from Veterans Florida." 45

The report does not indicate whether training grants were bundled for the same trainee. Consequently, businesses could be using Veterans Florida grants as the required match for CareerSource Florida training programs, and the employer may not be contributing to training expenses.

In previous EDR ROI reports, the analysis variously assume that "but for" the economic incentive, the activity would not have occurred. In this case, the analysis must assume that "but for" these particular training grant programs, the veteran trainees would not have been hired, would have been hired in lesser jobs, or would have been underpaid. Given that the state sponsors other training programs and grants that are essentially identical in nature to the Workforce Training Grant program, this is not a

<sup>41 &</sup>lt;a href="http://www.veteransflorida.org/wp-content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf">http://www.veteransflorida.org/wp-content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf</a>

<sup>&</sup>lt;sup>42</sup> These jobs include Broadband Technicians, Customer Service Representatives, Commercial Roofers, Electronic Associates & Assemblers, Security Guards, Direct Insurance Sales Agents, Technical Review Technicians, etc.

<sup>&</sup>lt;sup>43</sup> For a recent article on this recruiting pipeline, see "Amazon's D.C.-Area HQ2 a New Beachhead in Battle for Tech-Savvy Vets, Tech giant's planned move to Pentagon's backyard exacerbates local tussle for talent." WSJ, 1/1/19. <a href="https://www.wsj.com/articles/amazons-d-c-area-hq2-a-new-beachhead-in-battle-for-tech-savvy-vets-11546344001?mod=searchresults&page=1&pos=1">https://www.wsj.com/articles/amazons-d-c-area-hq2-a-new-beachhead-in-battle-for-tech-savvy-vets-11546344001?mod=searchresults&page=1&pos=1</a>

<sup>&</sup>lt;sup>44</sup> Section 295.22(3)(d)4., F.S. states that: "A business may receive a grant under the Quick-Response Training Program created under s. 288.047 and a grant under this section for the same veteran trainee. If a business receives funds under both programs, one grant agreement may be entered into with CareerSource Florida, Inc., as the grant administrator."

<sup>&</sup>lt;sup>45</sup> See "Veterans Florida Promotes Florida as a Veteran-Friendly State and Provides Numerous Services; Performance Measurement and Outreach Could Be Improved," OPPAGA Report No. 18-04, February 2018, p. 2. http://www.oppaga.state.fl.us/MonitorDocs/Reports/pdf/1804rpt.pdf, p. 10.

plausible assumption – nor is it likely that businesses are inherently biased against veterans and demand greater subsidies to hire them. Further, Veterans Florida has direct linkages to many of the other sponsoring organizations, so businesses and veterans are likely to be aware of those training programs. This may explain Veterans Florida's challenge with expending the appropriations for this program. For these reasons, the "but for" test fails in the present instance.

In this regard, Veterans Florida Workforce Training Grants duplicate training grants offered by CareerSource Florida (CSF)<sup>46</sup> and the twenty-four Regional Workforce Boards (RWBs). Since 1993, CSF Quick Response Training (QRT) grants have provided match funding to businesses for customized, skills-based training for new or retained jobs in Florida's targeted industries, which produce an exportable product or service. Since 1999, CSF Incumbent Worker (IWT) Training grants have provided match funding for customized, skills upgrade training for existing full-time employees of for-profit businesses. The twenty-four Regional Workforce Development Boards offer On-The-Job training programs for partial wage reimbursement of qualified employees. They also offer Employed Worker Training programs (EWT). EWT provides reimbursement for the cost of training prospective or current employees of qualified area businesses, and the training can be customized.

As to the value to businesses, Veterans Florida Workforce Training grants may be more generous to employers than either CSF or RWB grants (higher reimbursements, <sup>47</sup> more lenient qualifying criteria). Further, Veterans Florida staff indicate their services may be more accessible to businesses.

The Veterans Florida Entrepreneurship Program is not immune from being duplicative as well, but the linkage is not as clear. The third stage of the program, which offers intensive instruction, may be similar to existing university entrepreneurship programs; however, the cost structure and criteria for participating in those programs may be more stringent. In FY 2018-19, Veterans Florida is partnering with Florida Atlantic University, Florida Gulf Coast University, University of Central Florida, Tallahassee Community College and University of West Florida to offer instruction in entrepreneurship to veterans. At least two other state universities (Florida State University and University of Florida) have entrepreneurship programs tailored to veterans within their broader entrepreneurship programs. At least seven other State University System institutions (Florida Atlantic University, Florida Gulf Coast University, Florida International University, University of Central Florida, University of South Florida, and University of West Florida) and Hillsborough Community College offer general entrepreneurship programs.

### Conclusion

The primary purpose of services and programs offered by Veterans Florida is to promote Florida as a veteran-friendly state. The Workforce Training Grant program duplicates and is more generous than similar state programs, thereby diminishing its cost-effectiveness to the state. While the Entrepreneurship program may also have areas of overlap, it can be best viewed as complementary – expanding the state's efforts to provide a broad spectrum of training services to veterans in an area where few funds are available.

<sup>&</sup>lt;sup>46</sup> Veterans Florida staff indicate their initial program was patterned after CSF's QRT grant program.

<sup>&</sup>lt;sup>47</sup> The average per-trainee CSF QRT and IWT grants are an estimated \$1,353 and \$349, respectively, for FYs 2014-15 and 2015-16. Neither program has a per trainee reimbursement cap. Veterans Florida Business Training Grants averaged \$3,410 per trainee, and are capped at \$8,000 per trainee.

Cost savings in administration could be realized by shifting state funding of the Workforce Training Grant program to established training programs offered by CSF or the RWB. Enhanced funding could continue to be designated to train veterans, either under current qualifying criteria or under the program criteria of CSF or RWB programs. However, implementing this option should be contingent upon demonstration of comparable marketing capacity. If so, tailoring veteran training grants to the requirements and restrictions of existing programs may increase the potential ROI of the state's investments.

As previously addressed, the statutory purpose and design of a program are key considerations in an evaluation. A return-on-investment is a measure of financial returns and does not address issues of effectiveness or societal benefit. Overall, it is beneficial to the state to have more productive businesses and employees, even if the direct financial returns are not measurable in the short-run. Where the Workforce Training Grant program fails is in providing the same services provided elsewhere with higher costs and lower results. Until the program is redesigned, a ROI is not feasible.

While the return associated with the Entrepreneurship program is insignificant, a more positive return may be realized in the future from the training provided during the current period of review. More importantly, this program is still in an early stage of development. Returns that take years to develop are not captured in the required statutory analysis. Additionally, as this program matures and improved performance metrics are implemented, there may be more information from which to identify economic returns and evaluate the ROI to the state.

<sup>&</sup>lt;sup>48</sup> See "Economic Evaluation of CareerSource Florida's Training Program," December 31, 2018. Office of Economic and Demographic Research, December 31, 2018. <a href="http://edr.state.fl.us/Content/returnoninvestment/ROI-CareerSourceFlTrainingProg.pdf">http://edr.state.fl.us/Content/returnoninvestment/ROI-CareerSourceFlTrainingProg.pdf</a>

# **Appendix**

# Inventory of State-Funded Benefits for Veterans and Servicemembers, and their Dependents

The U.S. Department of Veterans Affairs (USDVA) and the U.S Department of Defense (USDOD) are the principal organizations serving veterans<sup>49</sup> and active duty military (hereafter referred to as service members<sup>50</sup>), as well as their spouses, dependents and survivors. The USDVA and USDOD administer federal benefits to qualified individuals.<sup>51</sup>

Florida agencies and state-supported organizations provide similar and complementary services, including access to state-funded benefits. The Florida Department of Veterans' Affairs (FDVA) is charged to provide:

"...assistance to all former, present, and future members of the Armed Forces of the United States and their dependents in preparing claims for and securing such compensation, hospitalization, career training, and other benefits or privileges to which such persons or any of them are or may become entitled under any federal or state law or regulation by reason of their service in the Armed Forces of the United States..." 52

The Florida Veterans Foundation (FVF) is a direct-support organization under contract with the FDVA to provide assistance, funding, and support for the department, in carrying out its mission.<sup>53</sup> Veterans may also receive assistance from the County Veteran Service Offices.<sup>54</sup> Direct educational services are available through Florida universities, colleges and other post-secondary educational institutions.<sup>55</sup>

In 2014, Florida Is For Veterans, Inc. (doing business as Veterans Florida) was created to "... promote Florida as a veteran-friendly state that seeks to provide veterans with employment opportunities and promote the hiring of veterans by the business community." Veterans Florida is also charged with implementing a Workforce Training Grant program to fund "customized, skills-based curriculum development and training, through partial reimbursement, to businesses in Florida's targeted, high-growth and high-wage industries." In addition, Veterans Florida administers the Veterans Florida

<sup>&</sup>lt;sup>49</sup> The term "veteran" is a person who served in the active military, naval, or air service and who was discharged or released under honorable conditions or who later received an upgraded discharge under honorable conditions. The term "wartime veteran" refers to veterans that have served during one of the periods of wartime service as recognized in the statutes. [s. 1.01(14), F.S.]

<sup>&</sup>lt;sup>50</sup> "Servicemember" means any person serving as a member of the United States Armed Forces on active duty or state active duty and all members of the Florida National Guard and United States Reserve Forces. [s. 250.01(19), F.S.]

<sup>&</sup>quot;Active duty" means full-time duty in active military service of the United States. [s. 250.01(1), F.S.]

<sup>&</sup>quot;State-Active Duty" means full-time duty in active military service of the State of Florida. [s. 250.01(21), F.S.]

<sup>&</sup>lt;sup>51</sup> For an overview of these benefits, see <a href="https://benefits.va.gov/benefits/">https://benefits.va.gov/benefits/</a>. Also see <a href="https://benefits.va.gov/benefits/">https://benefits/<a href="https://benefits/">https://benefits/<a href="https://benefits/">htt

<sup>52</sup> Section 292.05, F.S. www.FloridaVets.org

<sup>&</sup>lt;sup>53</sup> Section 292.055, F.S. <a href="https://floridaveteransfoundation.org/">https://floridaveteransfoundation.org/</a> The FVF also provides assistance for housing, living expenses, vehicles, and health care to state-active duty servicemembers and their dependents.

<sup>&</sup>lt;sup>54</sup> Section 292.10, F.S. For a directory of Offices, see <a href="http://floridavets.org/benefits-services">www.FloridaVets.org/benefits-services</a> and <a href="http://floridavets.org/wp-content/uploads/2012/08/CVSO">http://floridavets.org/wp-content/uploads/2012/08/CVSO</a> Directory 26Feb2018.pdf

<sup>&</sup>lt;sup>55</sup> For links to services and programs offered through the twelve universities in Florida's State University System, see <a href="http://www.flbog.edu/universities/">http://www.flbog.edu/universities/</a> For links to programs and services through the twenty eight member colleges of the Florida College System, see <a href="https://www.floridacollegesystem.com/students/veterans.aspx">https://www.floridacollegesystem.com/students/veterans.aspx</a>.

<sup>&</sup>lt;sup>56</sup> Section 295.21(2), F.S. <a href="http://www.veteransflorida.org">http://www.veteransflorida.org</a>

<sup>&</sup>lt;sup>57</sup> P. 2 http://www.veteransflorida.org/wp-content/uploads/2016/08/VeteransFloridaBusinessTrainingGrantProgramOverviewandSOP2016.pdf

Entrepreneurship Program, which offers tuition-free, online and on-campus instruction to qualified veterans.<sup>58</sup>

Through these organizations and other state agencies, servicemembers and honorably discharged veterans, as well as their spouses, dependents and survivors, can access a variety of state-funded benefits.<sup>59</sup> The purpose of this Appendix is to identify these benefits.

### **Education**

The U.S. Department of Veterans Affairs provides financial assistance to eligible veterans and dependents pursuing postsecondary education. Florida offers additional benefits to veterans and servicemembers, as well as their spouses, dependents and survivors, in the form of tuition and fee waivers, and financial assistance.

Undergraduate **tuition waivers** are granted to Purple Heart recipients for state universities, Florida College System institutions, and career and technical schools. <sup>60</sup> Florida also provides up to four years of funding for tuition and registration fees at eligible Florida postsecondary educational institutions for dependent children and spouses of veterans who are 100 percent service-connected permanently and totally disabled; dependent children and unremarried spouses of veterans who died as a result of service-connected injuries, disease, or disability sustained while on active duty; and dependent children of prisoners of war and persons missing in action. <sup>61</sup> Subject to fund availability, eligible state-active duty Florida National Guard members can benefit from the Florida Education Dollars for Duty program (EDD), which pays up to 100% of tuition and most fees for courses taken in properly accredited or licensed Florida public or nonpublic postsecondary institutions or technical centers. <sup>62</sup>

Under the Congressman C.W. "Bill" Young Veteran Tuition Waiver Program, **out-of-state** fees are waived for state universities, Florida College System institutions, career centers operated by a school district, or charter technical career centers for honorably discharged veterans or persons (such as the veteran's spouse or dependent) using educational assistance provided by the United States Department of Veterans Affairs, who physically reside in this state while enrolled in the institution. <sup>63</sup>

While other states also provide state-funded services similar to those offered in Florida, some states have additional benefits, such as farm and home loans, state income tax exemptions, death and burial benefits, and more expansive college tuition benefits (see Massachusetts, New York and Texas). In 2018, the Florida Office of Program Policy Analysis and Government Accountability (OPPAGA) reported that all 50 states have enacted legislation assisting veterans in transferring and obtaining occupational licenses and certifications, and at least 21 states have created a commission, task force, or job placement service to help transitioning veterans. See Veterans Florida Promotes Florida as a Veteran-Friendly State and Provides Numerous Services; Performance Measurement and Outreach Could Be Improved, OPPAGA Report No. 18-04, February 2018, p. 2. <a href="http://www.oppaga.state.fl.us/MonitorDocs/Reports/pdf/1804rpt.pdf">http://www.oppaga.state.fl.us/MonitorDocs/Reports/pdf/1804rpt.pdf</a>

<sup>58</sup> http://www.veteransflorida.org/veterans/veterans-florida-entrepreneurship-program/

<sup>&</sup>lt;sup>59</sup> Florida also provides enhanced consumer and legal protections to servicemembers and their dependents, largely addressing circumstances arising from military reassignments. See Part 1, ch. 250, F.S., and the Florida Uniformed Servicemembers Protection Act, Part IV, Ch. 250, F.S. For protections available under Federal Law, see the US Servicemembers Civil Relief Act (SCRA), Title 50, Appendix U.S.C., ss. 501 et seq., and the Uniformed Services Employment and Reemployment Rights Act (USERRA), Title 38 U.S.C., chapter 43 (adopted in Florida Law as s. 115.15, F.S.) Also see the "2017 Florida Military-Friendly Guide" published by the Florida Defense Support Task Force @ <a href="http://www.enterpriseflorida.com/wp-content/uploads/Florida-Military-Friendly-Guide.pdf">http://www.enterpriseflorida.com/wp-content/uploads/Florida-Military-Friendly-Guide.pdf</a>

<sup>&</sup>lt;sup>60</sup> Section 1009.26 (8), F.S.

<sup>&</sup>lt;sup>61</sup> Sections 295.01. 295.015, 295.016, 295.017, 295.018, 295.0185, 295.019, and 295.1095, subject to ss. 295.02, 295.03, 295.04, 295.05, and 1009.40, F.S.

<sup>&</sup>lt;sup>62</sup> Section 250.10(7), F.S.

Also see <a href="https://www.goarmyed.com/public/facility">https://www.goarmyed.com/public/facility</a> pages/NG Florida Education Services Office/default.asp

<sup>&</sup>lt;sup>63</sup> Section 1009.26(13)(a), F.S.

A waiver of out-of-state fees is also available to active-duty servicemembers residing or stationed outside of Florida, which may be used for on-line courses or for on-campus courses for those within driving distance of Florida institutions.<sup>64</sup>

Each of the twenty-eight Florida College System institutions are authorized to waive any portion of **student activity and service fees** (the financial aid fee, the technology fee, the capital improvement fee, etc.,) for servicemembers using the Military Tuition Assistance program through U.S. Department of Defense.<sup>65</sup>

Degree-seeking Florida residents who are active duty or honorably discharged veterans who served on or after Sept. 11, 2001, may be eligible to receive **financial assistance** from the Honorably Discharged Graduate Assistance Program (HDGAP) to pay for living expenses during holiday and semester breaks.<sup>66</sup>

Veterans and servicemembers, as well as their spouses, dependents and survivors, may also be eligible for non-financial benefits. Veterans and their spouse or dependents receiving GI Bill educational benefits are afforded **priority in course registration** in Florida colleges and universities.<sup>67</sup> Children of military personnel not stationed in Florida whose home of record or state of legal residence is Florida are given priority for enrollment in Florida Virtual School, and are exempted from tuition fees.<sup>68</sup>

Florida schools, colleges and universities must have policies to relieve currently enrolled students who are called to, or enlist in, active military service, from academic or financial penalties by virtue of performing military service. Students must be permitted the option of either completing the course or courses at a later date without penalty or withdrawing from the course or courses with a full refund of fees paid. <sup>69</sup> Additionally, Florida colleges and universities must have policies that enable eligible servicemembers or veterans to earn academic college credit for college-level training and education acquired in the military. <sup>70</sup>

# Preference in Employment, Career Training, and Contracting

With some exceptions, Florida Veterans, their dependents and survivors receive preference in state and local government employment and retention. This includes disabled veterans and their spouses; the unremarried spouse of a veteran who dies of a service-connected disability; the spouse of persons missing in action or forcibly detained or interned in the line of duty by a foreign government or power; the mother, father, legal guardian, or unremarried widow or widower of a servicemember who died in the line of duty under combat-related conditions; both wartime and non-wartime veterans; and current members of any reserve component of the United States Armed Forces or the Florida National Guard. <sup>71</sup>

<sup>&</sup>lt;sup>64</sup> Section 1009.26(14), F.S.

<sup>&</sup>lt;sup>65</sup> Section 1009.26(15), F.S.

<sup>&</sup>lt;sup>66</sup> See Specific Appropriations 75, ch. 2014-51; 71, 2015-232; 76, 2016-66; 73, 2017-70; 74, 2018-9, L.O.F., which has provided \$1 million annually to the program since 2014. Also see <a href="http://www.veteransflorida.org/2016/01/21/veterans-educational-benefits/">http://www.floridastudentfinancialaid.org/SSFAD/pdf/annualreportcurrent.pdf</a> p. 29.

<sup>&</sup>lt;sup>67</sup> Section 1004.075, F.S.

<sup>&</sup>lt;sup>68</sup> Section 1002.37. F.S.

<sup>&</sup>lt;sup>69</sup> Section 1004.07, F.S.

<sup>&</sup>lt;sup>70</sup> Section 1004.096, F.S.

<sup>&</sup>lt;sup>71</sup> Sections 110.2135; 295.065; and 295.07, F.S.

Florida has authorized private employers to adopt a "permissive employment preference" for veterans; the spouse of a veteran with a service-connected disability; the unremarried widow or widower of a veteran who died of a service-connected disability; or the unremarried spouse of a servicemember who died in the line of duty under combat-related conditions.<sup>72</sup>

Honorably discharged veterans have the **right to be reemployed** by the state or its political subdivisions to the same position or an equivalent position they held prior to such service in the armed forces, provided they return to the position within 1 year of their date of separation from military service. Additionally, such veterans have preference in promotion ahead of all others who are as well qualified or less qualified for the position.<sup>73</sup>

Veterans of the Southeast Asian conflict receive **preference in admission** to career center or career programs that receive state funding or support career training. Privately-supported career centers are encouraged to also provide a similar preference.<sup>74</sup>

State agencies are required to grant **vendor preference** to wartime veteran or service-disabled veteran business enterprises for the procurement of commodities or contractual services. Political subdivisions of the state are encouraged to offer a similar consideration to certified businesses.<sup>75</sup>

Additionally, servicemembers in the military reserves or Florida National Guard may not be denied employment, retention in employment, any promotion or advantage of employment, because of any obligation as a member of a reserve component of the Armed Forces.<sup>76</sup>

# **Employment Services and Training**

Florida offers a number of job training and placement services tailored to veterans through Veterans Florida, CareerSource Florida and the twenty-four Regional Workforce Boards.

The Veterans Florida Workforce Training Grant program provides partnering businesses with up to \$8,000 per full-time veteran employee for curriculum development and up to twelve months of training by companies in Florida's high-wage industries, 77 and the Entrepreneurship Program provides tuition-free, online and on-campus instruction in entrepreneurship. 8 Veterans Florida also assists employment seeking veterans by offering personal assistance with skills assessments, establishing employment goals, resume preparation, referrals to career centers, and applying for employment.

CareerSource Florida and the twenty-four Regional Workforce Boards provide job search services to Florida veterans through the Employ Florida Vets online portal and personnel of the regional service centers.<sup>80</sup>

<sup>&</sup>lt;sup>72</sup> Section 295.188, F.S.

<sup>&</sup>lt;sup>73</sup> Section 295.09, F.S.

<sup>&</sup>lt;sup>74</sup> Section 295.125, F.S.

<sup>&</sup>lt;sup>75</sup> Section 295.187, F.S.

<sup>&</sup>lt;sup>76</sup> Section 250.481, F.S.

<sup>&</sup>lt;sup>77</sup> Section 295.22(3)(d), F.S. *Also see* http://www.veteransflorida.org/grant/

<sup>&</sup>lt;sup>78</sup> Section 295.22(3)(e), F.S. *Also see* http://www.veteransflorida.org/veterans/veterans-florida-entrepreneurship-program/

<sup>&</sup>lt;sup>79</sup> Section 295.22(3)(b), F.S. Also see <a href="http://www.veteransflorida.org/careers/">http://www.veteransflorida.org/careers/</a>

<sup>80</sup> See <a href="https://veteran.employflorida.com/vosnet/Default.aspx##">https://veteran.employflorida.com/vosnet/Default.aspx##</a>

### **State Professional Licenses**

Florida waives the initial and renewal license or registration fees for veterans and servicemembers, and their spouses, for many professions regulated by the state.<sup>81</sup>

The Florida **Department of Business and Professional Regulation** waives the initial and renewal license fees for servicemembers and honorably discharged veterans (within two years of their discharge), as well as their spouses or a surviving spouse if the servicemember dies while serving on active duty, with some limitations, for all of the professions they regulate, including:<sup>82</sup>

- Accountants;
- Architects and Interior Designers;
- Auctioneers;
- Barbers;
- Building Code Administrators and Inspectors;
- Construction Contractors;
- Cosmetologists;
- Electrical Contractors;
- Employee Leasing Companies;
- Geologists;
- Home inspectors;
- Landscape Architects;
- Mold-related services;
- Pilot Commissioners;
- Professional Engineers;
- Real Estate Agents and Appraisers; and
- Veterinarians.

The **Department of Agriculture and Consumer Services** waives the initial and renewal license or registration fees for servicemembers and honorably discharged veterans, as well as their spouses or a surviving spouse if the servicemember dies while serving on active duty, with some limitations, <sup>83</sup> for many of the professions they regulate, including:

levels: registration and certification/licensing. Registration is the lower level of regulation, requiring that before an individual can be authorized to engage in commercial activity, the individual or business must submit verification of specified business information, such as legal organization, proof of insurance and local business tax, and a registration fee. Registration could also require verification of professional certification by a private organization, separate from the regulating entity. Certification or licensing requires practitioners meet certain minimum qualifications – established by the regulating entity – before they are authorized to perform certain types of commercial activities or operate certain types of businesses. Certification or licensing typically requires the individual meet educational and experience requirements, and pass a competency test administered or recognized by the regulating entity. Typically, a peer board sets the regulatory standards and disciplines certificate holders or licensees. For concealed weapons licenses, licensing represents a permit – official or legal permission to exercise a noncommercial, individual, private privilege.

<sup>82</sup> See Sections 455.02; 455.213(12); and 455.219(7)(a), F.S., for specific time-limits on use benefits.

<sup>&</sup>lt;sup>83</sup> The renewal waiver is available to honorably discharged veterans for only two years after their separation from active-duty service. A surviving spouse of a servicemember is also eligible for a renewal waiver if the servicemember was serving on active duty at the time of death and died within the 2 years preceding the surviving spouse's renewal due date.

- Health Studios;<sup>84</sup>
- Intrastate Movers and Brokers;<sup>85</sup>
- Motor Vehicle Repair Shops;<sup>86</sup>
- Pawnbroking;<sup>87</sup>
- Private Investigative, Private Security, and Repossession Services;<sup>88</sup>
- Professional Surveyors and Mappers;<sup>89</sup>
- Sellers of Liquefied Petroleum Gas;<sup>90</sup>
- Sellers of Travel;<sup>91</sup> and
- Telemarketing Services.<sup>92</sup>

The Florida **Department of Health** and the relevant regulatory boards offer expedited licensing and waive application, licensure and unlicensed activity fees for a serviceperson's spouse holding an active license to practice a health care profession in another state or jurisdiction who is seeking a license to practice a health care profession in Florida.<sup>93</sup>

The **Office of Financial Regulation** waives the initial and renewal license or registration fees for servicemembers and honorably discharged veterans, as well as their spouses or a surviving spouse if the servicemember dies while serving on active duty, with some limitations, for Mortgage Loan Originators and associated persons.<sup>94</sup>

The **Office of Financial Services** waives the initial, provisional and temporary license fees for servicemembers and honorably discharged veterans, as well as their spouses or a surviving spouse if the servicemember dies while serving on active duty, with some limitations, for insurance licensees, and licenses for bail bonds, fire safety, and funeral and cemetery services.<sup>95</sup>

The **Department of Education** waives the Florida Teacher Certification Examination fees (for the initial general knowledge, professional education, and subject area examination and initial certification) for veterans and servicemembers, as well as their spouses and surviving spouses. <sup>96</sup> In addition, DOE may grant a temporary certificate in education and establish a pathway for veteran officers for certification as a school principal for certain licenses and applicants.

Wartime veterans who have a disability rating of 50 percent or more are exempt from the \$10 state **notary commission** fee. <sup>97</sup>

<sup>&</sup>lt;sup>84</sup> Section 501.15, F.S.

<sup>85</sup> Section 507.03, F.S.

<sup>86</sup> Chapter 559.904, F.S.

<sup>87</sup> Chapter 539.001, F.S.

<sup>88</sup> Sections 493.6105, 493.6107 & 493.6113, F.S.

<sup>89</sup> Sections 472.015 and 472.016, F.S.

<sup>&</sup>lt;sup>90</sup> Section 527.02, F.S.

<sup>&</sup>lt;sup>91</sup> Section 559.928, F.S.

<sup>92</sup> Sections 501.605, 501.607, and 501.609; F.S.

<sup>93</sup> Section 456.024(3), F.S.

<sup>&</sup>lt;sup>94</sup> Sections 494.00312 and 494.00313; & 517.12, F.S. The renewal waiver is available to veterans within two years after their separation from active-duty service.

<sup>&</sup>lt;sup>95</sup> Chapters 497 and 626, F.S. The initial, provisional and temporary license fees for veterans is limited to veterans within two years after separation from active-duty service.

<sup>&</sup>lt;sup>96</sup> Section 1012.59, F.S.

<sup>&</sup>lt;sup>97</sup> Section 117.01(2), F.S.

Finally, all professional licensing boards or examiners are required to consider relevant military experience gained during a period of active duty service in the Florida National Guard or U.S. Armed Forces Reserves that interrupted an applicant's period of training for a professional license considered during a licensure determination. <sup>98</sup>

In July, 2018 the Florida Supreme Court approved rules to provide a process for an attorney licensed in another state to **practice law** in Florida for up to five years without taking the Florida Bar Exam, if the attorney is the spouse of a servicemember stationed in Florida.<sup>99</sup>

### **Motor Vehicle Licenses and Fees**

The Florida Department of Highway Safety and Motor Vehicles (DHSMV) and its agents, toll road agencies and regional transportation authorities, exempt or discount fees for a number of services to veterans.

Honorably discharged disabled veterans who have been residents of Florida continuously for the preceding 5 years or have established domiciles in this state are eligible for one free motor vehicle **license number plate** for either their owned or leased vehicles. Additionally, such veterans are exempt from **parking fees** on public roads while using the licensed vehicle.

Veterans are exempt from the \$1 or \$2 fee to have the word "Veteran" displayed on an identification card or driver license issued by the Department of Highway Safety and Motor Vehicles (DHSMV), and the \$6.25 service fee imposed by tax collectors for identification card and driver license issuance services. <sup>102</sup>

Honorably discharged veterans with 00% total and permanent service-connected disabilities are exempt from fees for original, renewal and replacement driver's licenses and identification cards. 103

Handicapped persons, to include veterans, certified as severely physically disabled and having permanent upper limb mobility or dexterity impairments that substantially impair the person's ability to deposit coins in toll baskets, are allowed free passage through all **tollgates** and over all **toll bridges** and **ferries** in Florida. <sup>104</sup>

Disabled veterans are eligible for a partial or full discount on fares for the use of a fixed-route transportation system operated by a regional transportation authority. 105

# **Recreational Licenses and Fees**

The Florida Division of Recreation and Parks of the Department of Environmental Protection and the Florida Fish and Wildlife Conservation Commission offer a number of free or discounted passes and licenses to veterans and servicemembers, and their spouses.

<sup>&</sup>lt;sup>98</sup> Section 250.483, F.S.

<sup>&</sup>lt;sup>99</sup>Chapter 21, Rules Regulating the Florida Bar. <a href="http://www.floridasupremecourt.org/decisions/2018/sc18-158.pdf">http://www.floridasupremecourt.org/decisions/2018/sc18-158.pdf</a>

<sup>&</sup>lt;sup>100</sup> Sections 320.084(1) and 320.0842, F.S.

<sup>&</sup>lt;sup>101</sup> Section 316.1964(1), F.S.

<sup>&</sup>lt;sup>102</sup> Sections 322.051(8), 322.14, and 332.135, F.S., as amended by s. 4, 5 & 6 of Ch. 2018-80, L.O.F.

<sup>&</sup>lt;sup>103</sup> Section 322.21(7), F.S.

<sup>&</sup>lt;sup>104</sup> Section 338.155(3), F.S.

<sup>&</sup>lt;sup>105</sup> Section 163.58, F.S.

The Division of Recreation and Parks offers a 25 percent discount on **Annual Entrance Passes to Florida State Parks** to Active Duty servicemembers and honorably discharged veterans. <sup>106</sup> Free Lifetime Military Entrance Passes to Florida State parks are available to honorably discharged veterans who have service-connected disabilities and for surviving spouses and parents of deceased members of the United States Armed Forces, National Guard or reserve units of the U.S. Armed Forces or National Guard who have fallen in combat. <sup>107</sup> Active Duty servicemembers and honorably discharged veterans receive \$10.00 discount on **Annual Entrance Passes to State Forests**, and honorably discharged Veterans who have service-connected disabilities received a free Lifetime Pass. <sup>108</sup>

The Florida Fish and Wildlife Conservation Commission considers servicemembers stationed in the state and their family members residing with them as Florida residents for the purposes of purchasing recreational **fishing and hunting licenses**. <sup>109</sup> Resident active or retired servicemembers are offered a reduced price (\$18.50) for the Florida Fish and Wildlife Conservation Commission's Military Gold Sportsman's License covering hunting, freshwater and saltwater fishing. <sup>110</sup> Exemption permits are available to participants in an outdoor recreational event that is being held for the rehabilitation or enjoyment of disabled veterans or active or reserve duty service members. <sup>111</sup> Disabled persons, including veterans, certified as totally and permanently disabled, are exempt from hunting, freshwater fishing, and saltwater fishing licenses and permits. <sup>112</sup>

# **State Use Tax Exemption**

Motor **vehicles imported** from a foreign country by an active service member or spouse are exempt from the use tax when the vehicle is registered or titled if it was purchased and used in a foreign country for six (6) months or longer before being imported into Florida, so long as the vehicle is registered or titled in Florida for personal use.<sup>113</sup>

# **Homestead Property Tax Exemptions**

Homestead exemptions are available on property owned by a taxpayer and used as the owner's permanent residence or the permanent residence of another who is legally or naturally dependent upon the owner. The value of the homestead exemption is currently up to \$50,000 of the assessed value of the real estate. Real estate owned and used as a homestead by totally and permanently disabled persons is totally exempt from taxation. There are additional Homestead exemptions for veterans and servicemembers, and their spouses, dependents and survivors.

The homestead of an honorably discharged veteran with a certified service-connected total and permanent disability, or who receives special pecuniary assistance due to a disability requiring specially adapted housing and a wheelchair for his or her transportation, is exempt from taxation. This exemption transfers to the subsequently unmarried surviving spouse. The surviving spouse of a veteran who died

<sup>&</sup>lt;sup>106</sup> Section 258.0145(1), F.S.

<sup>&</sup>lt;sup>107</sup> Section 258.0145(2) and (3), F.S. Also see <a href="https://www.floridastateparks.org/AnnualPass">https://www.floridastateparks.org/AnnualPass</a>

<sup>&</sup>lt;sup>108</sup> As referenced in <a href="http://www.enterpriseflorida.com/wp-content/uploads/Florida-Military-Friendly-Guide.pdf">http://www.enterpriseflorida.com/wp-content/uploads/Florida-Military-Friendly-Guide.pdf</a> per Florida Forest Service, Policy and Procedure Manual.

<sup>&</sup>lt;sup>109</sup> Section 379.101 (30) (b), F.S.

<sup>110</sup> Section 379.354(4)(j), F.S. Also see <a href="http://myfwc.com/license/recreational/military-gold/">http://myfwc.com/license/recreational/military-gold/</a>

<sup>111</sup> Section 379.353(2)(q), F.S. Also see http://myfwc.com/license/recreational/do-i-need-a-license/disabled-veteran-event/

<sup>&</sup>lt;sup>112</sup> Section 379.353(1)(a), F.S.

<sup>&</sup>lt;sup>113</sup> Section 212.08(7)(mmm), F.S.

<sup>&</sup>lt;sup>114</sup> Section 196.031, F.S.

<sup>&</sup>lt;sup>115</sup> Section 196.101, F.S.

from service-connected causes while on active duty, if the veteran was a permanent Florida Resident when the veteran died, is also eligible for the exemption. <sup>116</sup>

The homestead of an honorably discharged resident veteran who is age 65 or older and has a permanent combat-related disability is eligible for a discount on their homestead property, equal to the percentage of the veteran's permanent, service-connected disability. <sup>117</sup>

The homestead of an honorably discharged resident ex-service member who has been disabled to a degree of 10 percent or more by misfortune or while serving during a period of wartime service is eligible for a \$5,000 property tax exemption. This exemption is also extended to the subsequently unmarried surviving spouse. <sup>118</sup>

Military service members who have Florida homesteads and are deployed on active duty outside the United States in support of military operations designated by the Legislature are eligible for a property tax exemption. The exemption is equal to the taxable value of the qualifying service member's homestead on January 1 of the year in which the exemption is sought, multiplied by the number of days that the service member was on a qualifying deployment in the preceding calendar year, and divided by the number of days in that year. <sup>119</sup>

# **Waiver of Other Local Taxes or Fees**

Honorably discharged veterans, the spouse or unremarried surviving spouse of such a veteran, and the spouse of an active duty military service member who has relocated to the county or municipality pursuant to a permanent change of station order, are exempt from County and **Municipal Business**Taxes. 120

An honorably discharged, totally and permanently disabled veteran Florida resident is exempt from local government **building license or permit** fees for improvements upon a dwelling owned and used by the veteran as residence, if such improvements are limited to ramps, widening of doors, and similar improvements for the purpose of making the dwelling habitable or safe for the veteran.<sup>121</sup>

# **Reemployment Assistance**

The spouse of a servicemember who voluntarily leaves employment due to relocation as a result of his or her spouse's military orders is not otherwise disqualified for reemployment assistance benefits.<sup>122</sup>

# Florida Retirement System Creditable Service Credits

Florida Retirement System (FRS) members are eligible to purchase up to five years of FRS credit for their military service, to increase their retirement benefits. The cost to purchase credit for veterans who have served during one of the "wartime" events recognized in the Florida Statutes is significantly less than for the other veterans. 123

<sup>&</sup>lt;sup>116</sup> Sections 196.081 and 196.091, F.S.

<sup>&</sup>lt;sup>117</sup> Section 196.082, F.S.

<sup>&</sup>lt;sup>118</sup> Section 196.24, F.S.

<sup>&</sup>lt;sup>119</sup> Section 196.173, F.S.

<sup>&</sup>lt;sup>120</sup> Section 205.055, F.S., as created by s. 1, ch. 2018-80, L.O.F. This replaced a less generous provision in s. 205.171, F.S., (repealed in s. 2, chapter 2018-80, L.O.F.), which provided an exemption to "An honorably discharged disabled *wartime* veteran who is disabled from performing manual labor and is a permanent Florida resident, or their unremarried spouse...*up to \$50*."

<sup>&</sup>lt;sup>121</sup> Section 295.16, F.S.

<sup>&</sup>lt;sup>122</sup> Section 443.101(1)(a)1., F.S.

<sup>&</sup>lt;sup>123</sup> Section [ss. 1.01(14), 121.111 and 121.1115, F.S.

# **Access to State Domiciliary & Nursing Homes**

Veterans who are state residents and have been approved as eligible for care and treatment by the United States Department of Veterans Affairs may be eligible for residency in the Veterans' Domiciliary Home in Lake City, or one of the seven Veterans' Nursing Homes throughout the state. 124

<sup>&</sup>lt;sup>124</sup> Ch. 296, F.S.