DEVELOPING NON-MONETARY PUBLIC-PRIVATE PARTNERSHIPS WITH, AND ACCEPTING GIFTS TO VA FROM, NON-GOVERNMENTAL ORGANIZATIONS

- 1. **REASON FOR ISSUE.** To update the Department of Veterans Affairs (VA) policy on how to explore, establish, manage, track, and report on responsible and productive non-monetary public-private partnerships (P3) with, and accepting gifts to VA from, non-governmental organizations (NGO).
- 2. SUMMARY OF CONTENTS/MAJOR CHANGES. This directive provides updates to procedures and processes related to exploring, establishing, managing, tracking and reporting on non-monetary P3s with NGOs. Significant changes include the following:
 - a. Added An Appendix that lists the authorities to enter into P3s and to accept gifts and donations.
 - b. Added processing and tracking information.
 - c. Added and revised several definitions.
 - d. Expanded due diligence process.
 - e. Explain in more detail proper documentation.
 - f. Explain in more detail responsibilities of this directive's implementation.
 - g. Added hyperlinks for reference.
- **3. RESPONSIBLE OFFICE.** Veterans Affairs Office of Partnerships and Office of the Secretary (00).
- 4. **RELATED HANDBOOK.** Not applicable.
- **5. RESCISSION.** Developing Public-Private Partnerships with, and Accepting Gifts to VA from, Non-Governmental Organizations, issued May 29, 2015.

CERTIFIED BY:

BY DIRECTION OF THE CHIEF OF STAFF OF VETERANS AFFAIRS:

/s/ Guy T. Kiyokawa Assistant Secretary for Enterprise Integration /s/ Margaret B. Kabat Chief of Staff Office of the Secretary

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TABLE OF CONTENTS

1.	PURPOSE	3
2.	POLICY.	3
3.	RESPONSIBILITIES.	9
4.	REFERENCES	10
5.	DEFINITIONS	11
ΑP	PENDIX A: AUTHORITY REFERENCES	14

DEVELOPING NON-MONETARY PUBLIC-PRIVATE PARTNERSHIPS WITH AND ACCEPTING GIFTS TO VA FROM, NON-GOVERNMENTAL ORGANIZATIONS

1. PURPOSE.

- a. This directive establishes the Department of Veterans Affairs (VA) policy on how to explore, establish, manage, track, and report on responsible and productive non-monetary public-private partnerships (P3) with non-governmental organizations (NGO). In addition, this directive supplements related statutes, regulations, and other VA policies; and applies to VA accepting gifts. VA has a number of authorities to enter into P3s and to accept gifts as shown in the Appendix.
- b. This directive does not supersede the law as set forth in statutes and regulations, nor does it preclude Administrations and Staff Offices from developing consistent and relevant policy in the future. As such, the following P3 activities are excluded from coverage by this directive and are considered "out of scope":
 - (1) VA contracts;
 - (2) Provider agreements;
 - (3) Grants and cooperative agreements;
 - (4) Affiliation and disbursement agreements;
 - (5) Leases and licenses; and
 - (6) Arrangements with employee organizations, academic affiliates, and individuals acting on their own behalf that do not represent an NGO.

For these excluded activities, please contact the applicable office based on the specific activity.

2. POLICY.

a. General. To meet large scale and complex challenges requiring cross-sector solutions and collaboration, VA engages in non-monetary P3s with NGOs that leverage the full range of the Nation's talent, ingenuity, and commitment to action. It is VA's policy to develop and manage responsible and productive P3s with NGOs. These P3s not only further the Department's mission and priorities, but also build capacity and create platforms for sharing resources to better serve Veterans, their families, caregivers, survivors, and other VA beneficiaries. As such, VA strongly encourages VA staff to optimize current non-monetary P3s and engage in new non-monetary P3 opportunities with NGOs when and where appropriate while following VA's core values of Integrity, Commitment, Advocacy, Respect, and Excellence (I CARE).

b. Description. A non-monetary P3 is a voluntary collaborative working relationship between VA and one or more NGOs in which the goals, structures, governance, and roles and responsibilities are mutually agreed upon to deliver the best possible services. Non-monetary P3s with NGOs provide the capacity to achieve what may not otherwise be achieved by VA alone.

- (1) Effective non-monetary P3s with NGOs draw together different organizations with complementary and reinforcing strengths, allowing each partner to focus on its central capacities and assets to produce outcomes with greater impact than may be achieved independently by a single organization.
- (2) A VA Office seeking to establish a non-monetary P3 with an NGO will identify whether the relationship between VA and the NGO is considered a collaboration versus a partnership.
- (3) Distinguishing this difference during the initial discovery phase will establish the appropriate next steps to be initiated between the VA staff office and NGO(s).
- c. **Scope.** For the purposes of this directive "scope" defines which organizational relationships are subject to this directive and which are not.
 - (1) "In scope" refers to any NGO engaging with VA in a non-monetary P3 that has been formalized through a non-binding agreement such as a memorandum of understanding.
 - (2) As stated in section 1.b. "Out of scope" refers to any VA/NGO relationship that falls outside of the "in scope" reference above.
- d. Gift or Donation. For the purposes of this directive, a gift is the gratuitous transfer of ownership without consideration consisting of (a) the donative intent, (b) transfer of title or ownership, and (c) donor acceptance. Gifts or donations may be cash, services, gifts-in-kind, personality, or realty, including bequests and devises without the expectation of recompense, contingency, or privileged access in return. The VA Center for Development and Civic Engagement) is available to answer questions about gift donations and properly recording such actions.
- e. **Suitability.** VA staff should first consider the value a non-monetary P3 would add to VA's services, supports, and/or benefits. Possible reasons for pursuing non-monetary P3s with an NGO include, but are not limited to, the following:
 - (1) Advancing a shared objective;
 - (2) Enhancing impact through resource sharing;
 - (3) Improving programmatic reputation/visibility;

- (4) Achieving mutual programmatic goals;
- (5) Building trusted community relationships to improve customer experiences;
- (6) Increasing access to VA services and benefits;
- (7) Outreach and community engagement; and
- (8) Reach Veterans underserved and untethered from VA care.

VA staff must be able to show that the Department would be more effective by partnering through a non-monetary P3 for a specified purpose and outcome, and that associated VA resources, such as staff time, would serve VA's mission, goals, strategies, priorities, initiatives, projects, programs, benefits, and/or services.

- f. Avoiding Privileged Access. In order to avoid any suggestion or appearance of privileged access, all communication or interaction between VA and NGOs must be consistent with the established ethics principles that prohibit endorsement and preferential treatment, or the appearance thereof. See 5 C.F.R.§ 2635.101(b)(8) (no preferential treatment); § 2635. 702(c) (no official endorsements); and § 2635.702 (no use of public office for private gain).
- g. **Due Diligence.** VA staff will conduct due diligence prior to entering into any new non-monetary P3 with one or more NGOs to ensure that VA will be working with organizations that are void of controversies, unethical and/or illegal business practices, properly certified or registered for their specific profession. All VA offices entering into a non-monetary P3 with a NGO will complete levels one and two of the NGO Due Diligence Worksheet, for either a non-profit or for profit as appropriate. The two forms for P3 Due Diligence can be found on the Veterans Affairs Office of Partnerships (VAOP) SharePoint site. A link to the VAOP Share Point is included in Section 4, tiled References and found below. VA staff will consider the factors below for any new non-monetary P3s by reviewing publicly available information, including but not limited to:
 - (1) Whether the potential partner demonstrates programmatic effectiveness through stated performance metrics, measurable outcomes and/or impacts;
 - (2) Whether there are allegations that the potential partner is exploiting or misrepresenting themselves, Veterans, their families, or any others;
 - (3) Whether the P3 would result in any conflicts of interest, or the appearance thereof;
 - (4) Whether the P3 would result in any endorsement or sponsorship of the potential partner or their products or services, or the appearance thereof;

(5) Whether the potential partner's materials and other communications appear accurate, truthful, and not misleading;

- (6) Whether the potential partner is/was involved in any controversies or negative optics, past or present;
- (7) Whether the potential partner is a party to any pending legal action brought by or against a government agency (international, Federal, state, local, tribal);
- (8) Whether the potential partner is currently complying with all applicable laws, statutes, and regulations, as well as complying with their industry's standards and practices regarding business operations and programmatic services in a manner appropriate to the organization's size and scale of operations. For example:
 - (a) Programmatically, the NGO uses appropriate and effective therapeutic practices, and is properly registered, licensed, or certified to deliver such services; and/or
 - (b) Uses all appropriate safeguards and privacy standards to protect client and/or Veteran data; and/or
 - (c) Operationally, the NGO is a properly registered organization with all appropriate government agencies (Federal, state, local, etc.); and/or
 - (d) As a non-profit NGO, the potential partner spends at least 51 percent of its total expenses on its stated programs and/or services. This excludes contractors, vendors, or service providers unless they are donating to the VA.
- (9) Ongoing Review/Risk Management.
 - (a) If, during the performance of a P3, VA staff members involved with the partnership discover, or are made aware, that an NGO partner may not be operating within the scope or spirit of the approved partnership, VA staff will meet with the NGO partner to discuss the discrepancy or breach of agreement. Discussions should include steps for both parties to correct or clarify any discrepancies and how to continue fulfilling the responsibilities as outlined within the agreement.
 - (b) VAOP will be notified immediately by VA staff members once they discover, or are made aware, that an NGO is not operating in a responsible and productive manner as referenced in (9)(a). VAOP will provide an independent objective review of the NGO and alleged activities. Dependent upon substantiated findings, VAOP will provide

- guidance on a proper course(s) of action with the NGO and partnership activities.
- (c) If allegations are substantiated, the VA will determine an official course of action as to whether the partnership will continue dependent upon severity of the discrepancy. VA staff will determine whether the partnership's performance:
 - i Should continue,
 - ii Should be suspended pending additional information, or
 - <u>iii</u> Should be terminated. Unacceptable activities that could lead to termination include one or more of the factors as noted in Section 2. g(1) through g(8).
- (10) The acceptance of gifts and donations does not alone constitute a formal partnership (e.g., gifts from employee organizations, academic affiliates, and individual persons acting on their own behalf) as noted in Section 2.d. Each VA office will exercise the same due diligence when engaging with NGOs in this regard, and consider factors stated within this directive. Similarly, other activities may not be considered a formal non-monetary partnership, but it is the responsibility of VA staff to exercise good judgment and thorough vetting when participating in activities such as, but not limited to:
 - (a) Collaborating on a one-time outreach activity,
 - (b) Serving as a subject matter expert on a panel,
 - (c) Attending a meeting,
 - (d) Serving as a speaker in a program or event, or
 - (e) Working with an organization to distribute outreach on an ad hoc basis or similar activity.
- h. **Memorandum of Understanding (MOU).** Non-monetary P3 activities with NGOs that are not specifically authorized by statute or regulation, or for which established VA policy does not exist (see Section 1.b. for a list of excluded activities), should be developed through a non-binding documented MOU, in consultation with the VA Office of General Counsel (OGC) and VAOP. The MOU should include the following sections:
 - (1) Purpose. This includes the legal names and addresses of each partner (VA and NGO) and legal authorities for the P3;
 - (2) Background. This includes a brief background summary of each partner;

- (3) Objectives;
- (4) Responsibilities;
- (5) Performance Measures. This section should include proposed metrics to measure the impact or efficacy of the P3;
- (6) Points of Contracts. This should include at least one lead point of contact within each partnering organization;
- (7) Legal Limitations;
- (8) Duration, Amendment, Review, Termination, Disputes; and
- (9) Approvals. This is where each organization's approving officials provide their final signatures.
- i. MOU Approval. A nonbinding agreement between VA and an NGO has a formal process with steps to be followed for approval directed by VAOP. The steps are outlined on VAOP's SharePoint site and the link can be found below in Section 4 titled References and found below. For additional guidance on the MOU approval process see the October 6, 2023, memorandum signed by the VA Chief of Staff titled Non-Monetary Public-Private Partnerships with Non-Governmental Organizations Memorandum of Understanding Approval Process.
- j. VA NGO Logo Approval. A collaboration or P3 between VA and one or more NGO does not indicate an automatic approved usage of the VA NGO Logo. Proper authorization to utilize the VA NGO Logo must be achieved via the steps outlined on VAOP's SharePoint and also in Section 4. REFERENCES below. For additional guidance on the VA NGO Logo approval process see the November 29, 2023, memorandum from the Chief of Staff titled, Department of Veterans Affairs (VA) Non-Governmental Organization (NGO) Logo - Request Form.
- k. **Official VA Seal.** The official VA Seal is not, and will not generally be, authorized for use by any organizations external to VA, which include NGOs.
- I. Documentation. Each Administration or Staff Office will ensure that information on non-monetary P3s with NGOs will be inputted into the Salesforce Strategic Relationships Application (SRA) (or relevant database as directed by VAOP). Contact VAOP for access to, or any questions about SRA for the purposes of recording and reporting information related to non-monetary P3s. Non-monetary P3s with NGOs will not go beyond 3 years without conducting a full due diligence review and partnership assessment. The staff office that owns and manages the partnership will conduct this review. Information recorded will include at a minimum the following:
 - (1) NGO name, address, and contact information;

- (2) Engagement lead points of contact information (VA and NGO);
- (3) Both levels of due diligence performed and date;
- (4) Description of the partnership's purpose or goals;
- (5) Significant activity and recorded performance measures;
- (6) The signed final copy of the MOU, if applicable; and
- (7) Status (active/inactive).

3. RESPONSIBILITIES.

- a. **Secretary of Veterans Affairs.** The Secretary, through VAOP, shall:
 - (1) Support the goals of this directive;
 - (2) Provide advice, oversight, training, and other supports to VA Administrations and Staff Offices department wide as it relates to nonmonetary P3s with NGOs;
 - (3) Maintain a relevant partnership database; and
 - (4) Review this directive at least every 3 years to identify information that is obsolete or needs to be updated.
- b. Under Secretaries, Assistant Secretaries, and Other Key Officials or their designees shall:
 - (1) In consultation with VAOP, implement the policy set forth in this directive by developing consistent internal Administration and Staff Office policies, procedures, and communications;
 - (2) Ensure wide dissemination of this directive and any available P3 trainings, communications, and resources;
 - (3) Ensure that systems, processes, and procedures are in place to document, track, monitor, and report P3 information, status, and activity. This should include recording all relevant information regularly into the SRA of the partnerships that they manage;
 - (4) Respond to VA data calls to provide information needed for Department-level reports on P3s; and
 - (5) Designate at least one point of contact within their organization to respond to internal requests pertaining to P3s via a data call from the Office of the Secretary (OSVA) and VAOP.

VA Directive 0008 November 12, 2024

c. Office of the General Counsel. The Office of the General Counsel (OGC) shall:

- (1) Provide legal advice and guidance on non-monetary P3s with NGOs;
- (2) Review the mechanisms used to enter into non-monetary P3s with NGOs within 10 business days of submission to OGC; and
- (3) Answer questions regarding potential conflicts of interest and ethics laws, rules, and regulations.
- d. **Office of Public and Intergovernmental Affairs.** The Office of Public and Intergovernmental Affairs (OPIA) shall:
 - (1) Provide consultation and training for activities utilizing social media and website platforms; and
 - (2) Coordinate internal and external media support for Office of the Secretary of Veterans Affairs-level P3 events.
- e. Staff Offices. The Staff Offices that own and manage partnerships shall:
 - (1) Perform due diligence on the NGO;
 - (2) Prepare and establish documentation of MOUs, as appropriate;
 - (3) Document, track, and record P3s in the SRA, including performance measures:
 - (4) Immediately notify all appropriate officials, as needed if staff offices discover, or are made aware, that an NGO partner may not be operating within the scope of the approved partnership; and
 - (5) Be the sponsor of the VA NGO Logo approval process on behalf of the NGO should the NGO seek approval to use the VA NGO Logo.

4. REFERENCES.

- a. <u>Veterans Affairs Office of Partnerships SharePoint</u> (https://dvagov.sharepoint.com/sites/vaop/).
- b. MOU Approval Non-Monetary Public-Private Partnerships with Non-Governmental Organizations Memorandum of Understanding Approval Process (https://dvagov.sharepoint.com/sites/vaop/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2Fvaop%2FShared%20Documents%2FMOU%20Approval%20Memo%20%28VIEWS%2010783037%29%2Epdf&parent=%2Fsites%2Fvaop%2FShared%20Documents).

c. <u>VA NGO Logo Department of Veterans Affairs (VA) Non-Governmental Organization (NGO) Logo - Request Form</u>

(https://dvagov.sharepoint.com/sites/vaop/Shared%20Documents/Forms/AllItem s.aspx?id=%2Fsites%2Fvaop%2FShared%20Documents%2FVA%20NGO%20 Logo%20Approval%20Memo%2Epdf&parent=%2Fsites%2Fvaop%2FShared%20Documents).

d. Gift and Partnership related authorities

(https://dvagov.sharepoint.com/sites/vaop/Shared%20Documents/Forms/AllItem s.aspx?id=%2Fsites%2Fvaop%2FShared%20Documents%2FVAOP%20Intrane t%20LEGAL%20GUIDANCE%2Epdf&parent=%2Fsites%2Fvaop%2FShared%20Documents).

e. <u>President's Memorandum on Transparency and Open Government</u> (https://www.govinfo.gov/app/details/DCPD-200900010).

5. DEFINITIONS.

- a. **Administration.** A generic term used to identify one of the three major VA operational elements listed below and when they are referred to as a group, the term "Administrations" may be used):
 - (1) Veterans Health Administration (VHA),
 - (2) Veterans Benefits Administration (VBA), and
 - (3) National Cemetery Administration (NCA).
- b. Collaboration. When VA and one or more NGOs works together informally to achieve a common goal, where little to no resources are needed, roles and responsibilities are minimal, very little management of the collaboration is needed, may or may not have measurable outcomes and impact, and either party can walk away at any time (expressed or implied commitment). A collaboration may not have clearly defined commitment of time, resources, roles and responsibilities, and outcomes.
- c. Contracts. A mutually binding legal relationship obligating the seller to furnish the supplies or services (including construction) and the buyer to pay for them. It includes all types of commitments that obligate the Government to an expenditure of appropriated funds and that, except as otherwise authorized, are in writing.
- d. **Department.** A generic reference to the entire Department of Veterans Affairs, which includes VA Central Office, the Veteran Integrated Service Networks, and all field facilities.

e. **Due Diligence.** The research and analysis of an organization prior to entering into a partnership that involves evaluating the risks and benefits of the potential partnership.

- f. **Engagement.** Generic reference to non-monetary public-private relationships. See Section 5. i.
- g. **Impact.** Has an effect on Veterans, families, caregivers, and survivors through a non-monetary P3 for a specified purpose or task, and that associated VA resources, such as staff time, would serve VA's mission, goals, strategies, priorities, initiatives, projects, programs, benefits, or services.
- h. **Memorandum of Understanding (MOU).** An agreement between two parties that is not legally binding, but which outlines the responsibilities of each of the parties to the agreement.
- Negative Optics. Any on-going or previous activity that includes controversy, legal judgements, scams, alleged illegal or unethical activities, conflicts of interest, or lawsuits.
- j. **Non-Governmental Organization (NGO).** Any external (private or commercial) entity other than a government agency (Federal, state, local, tribal), including but not limited to corporations, nonprofit organizations or associations, and international and multinational organizations.
- k. **Office.** Any VA office responsible for executing management functions, and for assisting and supporting field office and sites in environment, safety and health, administrative, management, and technical area.
- I. **Office of General Counsel.** Includes all offices supervised by the General Counsel including VA District Counsel offices.
- m. Office of Public and Intergovernmental Affairs (OPIA). OPIA develops, maintains, and communicates the Department's message through media relations and public, intergovernmental, and Veteran engagement to empower Veterans and their families. OPIA is responsible for overseeing the Department's communications with Veterans, the public, VA employees and the news media. OPIA also provides VA leadership with strategic advice, guidance, and information by fostering partnerships, and acting as liaison between state, local, tribal, insular, and international governments.
- n. **Office of the Secretary Veterans Affairs.** The Office of the Secretary Veterans Affairs is responsible for the proper execution and administration of all laws administered by the Department and for the control, direction, and management of the Department.

o. **Outcomes.** Outcome metrics are the specific data collected to assess the extent to which expected results of a P3 (such as to increase veteran access,) have been achieved.

November 12, 2024

- p. Performance Measures. The ability to capture objective performance, quantitatively and qualitatively, through metrics that demonstrate the impact of the P3.
- q. Public-Private Partnership (P3). Where VA and one or more NGOs outline commitments on explicit elements over a specific period of time and are documented through a formalized agreement such as a non-binding Memorandum of Understanding (MOU). A partnership has clearly defined resource allocations, guidelines, defined roles and responsibilities, and measurable outcomes and impact.
- r. **Relationship.** The connections that exist between VA and an NGO, a commitment to an ongoing engagement.
- s. **Significant Activity.** Any engagement with an NGO that quantitatively or qualitatively improves or impacts, as demonstrated anecdotally or empirically, the lives of Veterans, family members, caregivers, survivors, or other VA beneficiaries.
- t. **Service Providers.** An organization that provides services to customers.
- u. **Staff Office.** A generic term used to identify one of the offices included under VA Central Office. This does not refer to VHA, VBA, and NCA, nor does it refer to medical facilities, regional offices, or cemeteries.
- v. **Strategic Relationship Application.** The Strategic Relationship Application (SRA) the departmental database on the Salesforce platform that allows one to view and manage VA's external relationships. SRA allows staff to input, manage and report on engagements (events, collaborations, partnerships, and so on) with external organizations. Through SRA, staff offices are able to manage key information related to each engagement and the external organization. Any VA employee can gain access internal use only.
- w. **Vendor.** An individual or organization that provides services, supports, products and/or information to customers.
- x. Veterans Affairs Office of Partnerships (VAOP). develops and sustains a system of oversight, accountability, and guidance for the establishment of non-monetary P3s with NGOs that support and benefit Veterans. The office provides an enterprise-wide resource for NGO collaborations while actively managing risks by ensuring transparency and compliance with relevant P3 policies and directives.

APPENDIX A: AUTHORITY REFERENCES

AUTHORITY	REFERENCES
Authority for the Secretary to accept gifts, for use in carrying out all laws administered by VA. Delegated to certain VA officials.	38 U.S.C. §§ 8301-8305; 31 USC 1321(a)(45), (b); VHA Directive and Handbook 4721; Delegation Memo, 9/10/2005; Delegation Memo, 3/7/2011; VA Financial Policy and Procedures, Vol. II, Chapter 7D
Authority for the Secretary to accept gifts of land, interests in land, or facilities for use as medical facilities.	38 U.S.C. § 8103(a)(1)-(2), VHA Handbook 4721.
Authority for the Secretary to accept gifts for building, acquiring, and operating medical facilities.	38 U.S.C. § 8104(e), VHA Handbook 4721.
Authority for the Secretary to accept gifts of funds and other assistance to support VA's assistance to Veterans service organizations in providing recreational activities to further the rehabilitation of disabled veterans.	38 U.S.C. § 521(b), see Delegation Memo, 3/7/2011
Authority for the Director of the Office of National Veterans Sports Programs and Special Events to seek sponsorships and donations from the private sector to defray costs of carrying out the responsibilities of the Director to the maximum extent feasible.	38 U.S.C. § 322(b)(5), see Delegation Memo,3/7/2011
Authority for the Secretary to accept gifts of uncompensated services, i.e., volunteers.	38 U.S.C. § 513
Authority for the Secretary to accept gifts of land for national cemeteries. Authority for the Secretary to accept gifts for the purpose of beautifying national cemeteries.	38 U.S.C. § 2406 and 38 U.S.C. § 2407
Authority for the Secretary to accept gifts of merchandise, fixtures, equipment, and supplies for the use and benefit of the Veterans' Canteen Service.	38 U.S.C. § 7802(h)
Authority for agencies to accept gifts of payment for travel, subsistence, and related expenses with respect to attendance of the employee (and the spouse of such employee) at any meeting or similar function relating to the official duties of the employee.	31 U.S.C. § 1353, 41 C.F.R. §§ 304- 1.1 through 9.7.
Authority for Government employees to accept gifts of contributions and awards incident to training in non-Government facilities and payment of travel, subsistence, and other expenses incident to attendance at meetings from certain nonprofit organizations.	<u>5 U.S.C. § 4111</u>
Authority for the Secretary to authorize establishment of nonprofit corporations to provide a flexible funding mechanism for the conduct of approved research and education.	38 U.S.C. §§ 7361-7366
Authority for the Secretary to obtain by gift any automobile, motor vehicle, or other conveyance deemed necessary to provide special driver training courses.	38 U.S.C. § 3903(e)(3)