

**SUPPORTING STATEMENT  
DEPARTMENT OF LABOR  
VETERANS' EMPLOYMENT AND TRAINING SERVICE  
Federal Contractors Veterans' Employment Report VETS-4212  
OMB No. 1293-0005**

**A. Justification**

**1. Legal and Administrative Requirements**

The Veterans' Employment and Training Service (VETS) is responsible for administering the reporting requirement under the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA), 38 U.S.C. 4212(d). VEVRAA obligates Federal contractors and subcontractors that are subject to the statute's affirmative action provisions in 38 U.S.C. 4212(a) to report annually to the Secretary of Labor on their employees and new hires who belong to the specific categories of veterans protected under the statute. VETS promulgated two sets of regulations to implement statutory reporting requirements under VEVRAA before and after amendment in 2002 by the Jobs for Veterans Act, (JVA) (Pub. L. 107-288).

Prior to the JVA amendments, VEVRAA required contractors to annually report the number of employees in their workforces and new hires during the reporting period, by job category and hiring location, who are special disabled veterans, veterans of the Vietnam era, recently separated veterans, and veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized. The regulations in 41 CFR part 61-250 implement these reporting requirements and apply to contracts of \$25,000 or more entered into before December 1, 2003, unless they were modified on or after that date and have a value of \$100,000 or more. The existing part 61-250 regulations require covered contractors to use the VETS-100 Federal Contractor Veterans' Employment Report (VETS-100 Report) to report the information on their veterans' employment.

As amended by the JVA, VEVRAA requires contractors to report the number of employees in their workforces and new hires during the reporting period, by job category and hiring location, who are "qualified covered veterans." 38 U.S.C. 4212(d)(1). The statute defines "covered veteran" as any of the following veterans: disabled veterans, Armed Forces service medal veterans, veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized, and recently separated veterans. 38 U.S.C. 4212(a)(3). The JVA reporting requirements are implemented by the regulations in 41 CFR Part 61-300 and are applicable to Government contracts of \$100,000 or more entered into on or after December 1, 2003. In addition, a contract that was entered into before December 1, 2003, is subject to the part 61-300 regulations if it was modified on or after December 1, 2003, and meets the contract dollar threshold of \$100,000 or more. The existing regulations in part 61-300 require contractors to use the Federal Contractor Veterans' Employment Report VETS-100A (VETS-100A Report) to provide the specified information on veterans' employment.

Both the VETS-100 Report and VETS-100A Report were last approved by the Office of Management and Budget (OMB) on September 5, 2011, under OMB No. 1293-0005. The Final

Rule rescinds the regulations in part 61-250 because the regulations are obsolete. Therefore VETS will not seek an extension of the approval of the VETS-100 Report.

The Final Rule revises the part 61-300 regulations and renames the annual report prescribed by those regulations the Federal Contractor Veterans' Employment Report VETS-4212 ("VETS-4212 Report"). The VETS-4212 Report requires contractors and subcontractors to provide, by job category and hiring location, the total number of employees and the total number of employees who are protected veterans; the total number of new hires during the reporting period; and the total number of such new hires who are protected veterans. In addition, the VETS-4212 Report, as does the currently approved VETS-100A Report, requires contractors and subcontractors to report the maximum and minimum number of employees employed in the reporting period.

Contractors subject to the part 61-300 regulations will continue to use the VETS-100A Report to provide the required information on their employment of protected veterans during the 2014 reporting cycle. The Final Rule provides that contractors will begin using the VETS-4212 Report for the first time when they file their annual reports on veterans' employment in 2015. Accordingly, VETS seeks extension of the approval for the VETS-100A Report and approval of the VETS-4212 Report. The Department intends to submit a non-material change request to discontinue the VETS-100A Report at the end of the 2014 reporting cycle. At that time, continuing the VETS-100A Report will no longer have practical utility for the agency.

## **2. Use of Information Collected**

The information collected is to be used by the Department of Labor for compliance monitoring and, in accordance with a mandate contained in 38 U.S.C. 4212(d), to make a database available of contractors that have complied with the requirements of 38 U.S.C. 1354(b). Under 31 U.S.C. 1354(a)(1), an agency is prohibited from obligating or expending funds to enter into a contract with a contractor that was required to comply with the reporting requirements in 38 U.S.C. 4212(d) the preceding fiscal year, but failed to do so. The agency may award the contract once the contractor submits the report required by 38 U.S.C. 4212(d) for the fiscal year concerned.

Further, Section 708 of the Camp Lejeune Families Act, codified at 38 U.S.C. 4212(d) (3), requires the Secretary of Labor to maintain an internet website on which to publicly disclose the information that contractors provide in their annual reports on veterans' employment.

## **3. Use of Information Technology**

In order to comply with the Government Paperwork Elimination Act (GPEA) respondents are encouraged to file the annual report electronically using the web-based filing system. This option is in keeping with the intent of the GPEA to reduce the burden on respondents. In addition, to assist small businesses, as required under the Small Business Regulatory Enforcement Fairness Act of 1996, the annual report can be completed on the Internet. The annual report required to be submitted under 38 U.S.C. 4212(d) is in a format familiar to most of the respondents utilizing modern information technology.

**4. Description of Efforts to Identify Duplication**

Information concerning the hiring and employment of veterans by Federal contractors is not being collected by any other agency.

**5. Collection of Information Impact on Small Businesses or Other Entities**

Small businesses and entities are required by 38 U.S.C. 4212(d) to furnish the same information as large entities; however, the agency has carefully considered respondent burden and agency needs in developing these information collection requirements. The elimination of one report should reduce the burden hours for those who file the VETS-100 and those who file both the VETS-100 and the VETS-100A Report. In addition, the VETS-4212 Report requires fewer reportable items. The currently approved VETS-100A Report required under the existing part 61-300 regulations has 82 unique reportable items. The VETS-4212 Report that would replace the currently approved VETS-100A Report has just 42 unique items – a reduction of nearly 50 percent. The reduction in the number of reportable items is expected to reduce the time it takes to complete and file the annual report on veterans' employment.

**6. Consequences to Federal Programs if Information Were Collected Less Frequently**

If Federal contractors were permitted to respond less frequently than on an annual basis, the Department of Labor would not comply with the requirements of 38 U.S.C. 4212(d). Requiring contractors to annually submit information on veterans' employment, as prescribed by 38 U.S.C. 4212(d), also enables Federal agencies to comply with 31 U.S.C. 1354. The Congress' rationale for this reporting requirement was that it signals to Federal contractors the importance of their affirmative action obligations to disabled veterans; active duty wartime or campaign badge veterans; Armed Forces Service Medal veterans; and recently separated veterans.

**7. Special Circumstances for the Collection of Information**

There are no special circumstances for the collection of this information.

**8. Solicitation of Public Comments on the Collection of Information**

Concurrent with submission of an ICR submitted to OMB on February 24, 2014 (ICR Reference Number 20306-1293-001), VETS published a Notice of Proposed Rulemaking (NPRM) in the *Federal Register* that provided a 60-day period for the public to comment on the proposed change to the collection of information. See 79 FR 10063. The NPRM also invited the public to provide comments to both VETS and the Office of Management and Budget (OMB) as to the specific format and content of the proposed VETS-4212 Report. VETS received comments on the VETS-4212 Report, instructions for completing the report, and the agency's burden estimates, which are discussed below.

VETS received one comment suggesting that it should publicly disclose aggregate protected veteran workforce data and related percentages of protected veterans in the Federal contractor workforce, using the data reported by Federal contractors under the VETS-4212 Report, so as to be useful to contractors when assessing the effectiveness of their veteran

outreach programs, in accordance with the Office of Federal Contract Compliance Programs' (OFCCP) VEVRAA regulations at 41 CFR part 61-300, *et seq.* VETS acknowledges the comment, and intends for Federal contractors to use data showing the total number of protected veterans employed and newly hired during the reporting period to monitor the success of their recruitment and outreach efforts in attracting protected veterans. VETS also concurs with the suggestion of disclosure, and notes that information currently collected from the VETS-100 and the VETS-100A reports is available to the public on the Data.gov website at: <http://catalog.data.gov/dataset/vets-100>, and <http://catalog.data.gov/dataset/vets-100a>. Data collected through the VETS-4212 Report will similarly be made available to the public.

Three commenters requested VETS include the VETS-4212 Report in the Final Rule and make it subject to notice and comment rulemaking. VETS proposed removing the VETS 4212 Report from the regulations so that it would be easier to make future changes to the annual report that did not require notice and comment rulemaking. As VETS explained in the NPRM, the public still would have an opportunity to comment on any subsequent changes to the annual report under the Paperwork Reduction Act (PRA) clearance procedures. Thus, under the Final Rule, the VETS-4212 Report is not included in the regulatory text or as an appendix.

Four commenters recommended that the VETS-4212 Report be modified to reflect the same numbering system as the EEO-1 Report, to ease the burden on Federal contractors in meeting their reporting obligations for both reports. VETS agrees, and has renumbered the job categories on the VETS-4212 Report to mirror the numbering system on the EEO-1 Report. The job categories on both the EEO-1 and the VETS-4212 Reports will be the same.

One commenter generally asserted that some of the fields on the VETS-4212 Report are not required by statute. For example, the commenter observed that VEVRAA requires contractors to report the total number of new hires during the reporting period who are protected veterans, but the statute does not require new hire data to be reported by job category. VETS has taken this comment under consideration, and has modified the VETS-4212 Report to include an instruction that "answers to questions in all areas of the VETS-4212 Report are mandatory unless otherwise specified." Thus, the report indicates that providing data on new hires by job category is optional. The commenter also asserted that providing the total number of employees who are protected veterans, and the total number of employees is not required. VETS disagrees. In addition to providing the total number of employees and the total number of protected veterans in each job category, VETS interprets the statute to require the total number of protected veterans and the total number of employees as well.

VETS received one comment that its estimate of burden hours for the VETS-4212 Report is incorrect, and that the elimination of data fields will have no impact on the time necessary to complete the report. After careful reconsideration, VETS stands by its estimate. The VETS-4212 Report requires 50 percent fewer reportable items than the currently approved VETS-100A Report. Additionally, VETS expects that contractors' burden hours will be further reduced by the rescission of the part 61-250 regulations. As set forth in the NPRM, VETS calculates that as a result of these changes, over a ten-year period, the proposed revisions should

save Federal contractors about 804,300 burden hours and approximately \$18.2 million in salary equivalent burden costs.

VETS established a base for calculating burden hours utilizing burden hours calculated in 2008 to assess the time and cost necessary to complete the VETS-100 and VETS-100A Reports. VETS conducted field testing and market research in conjunction with a number of employers and professional associations as part of its calculation of the burden associated with the VETS-100A Report; one of those associations, affiliated with the contractor community, commented on the NPRM, and did not object to VETS' calculus.

According to the commenter who objected to VETS' calculus for determining time and cost associated with completing the VETS 4212-Report, VETS underestimated the amount of time required to retrieve, review, correct, edit, and compile the information necessary for completing these reports. However, VETS notes that contractors may use the human resources information systems which are already in place for their existing VETS-100A reporting obligations to collect the information required in the Final Rule. Therefore, since the information to be collected has not materially changed, a contractor will have only a one-time modification of its systems which would not require the contractor to implement additional procedures to retrieve, review, correct, edit, and compile the report as the commenter suggested.

One commenter recommended that contractors with hiring locations employing fewer than 50 employees be allowed to report on their employment of protected veterans by providing a list showing the name, address, and total employment of each hiring location employing fewer than 50 employees and a data grid combining all employees working at those hiring locations by relevant job category, instead of being required to file consolidated reports that cover all hiring locations within one State. According to the commenter, this change would make the structure of VETS reporting identical to that of EEO-1 reporting. However, VETS believes that consolidated veterans' employment data at the State level would be more useful to contractors than aggregated data at a national level when evaluating their efforts to employ and promote protected veterans. Accordingly, the agency has not adopted this recommendation.

In addition to the February 24, 2014, NPRM comment request for the VETS-4212 Report, the Department published a notice in the *Federal Register* on March 5, 2014, providing the public an opportunity to comment on continuing the VETS-100 and VETS-100-A Reports. See 79 FR 12529. No comments were received. Subsequent to that publication, it has become clear that the VETS-100 will no longer have practical utility at the earliest time OMB could conclude its review of this ICR; therefore, the Department has not included the VETS-100 Report in this request.

#### **9. Gift Giving**

The Department does not offer any payment or gift to respondents of this information collection.

#### **10. Assurance of Confidentiality**

No elements of confidentiality are involved. The data collected on the VETS-100A and VETS-4212 Reports will not identify any individual by name, social security number, or other form of personally identifying information.

**11. Sensitive Questions**

No data collected is of a sensitive nature.

**12. Estimate of the Hour Burden for the Collection of Information**

The burden is the aggregate number of hours required for contractors to annually submit the information on their veterans' employment using the VETS-4212 Report.

**Annual Burden Calculation**

**Estimate of the Hour Burden for the Collection of Information**

The burden hours that would result from the Final Rule are made up of two components. The first component is a one-time estimate of the burden hours associated with contractors adjusting their recordkeeping systems to generate the information on veterans' employment required by the proposed revisions to § 61-300.11, and the VETS-4212 Report. The second component is the aggregate number of hours required for contractors to annually report on their employment of protected veterans by filing the VETS-4212 Report.

**One-Time Implementation Burden**

Approximately 14,700 contractors filed annual VETS-100A Reports, and nearly 6000 contractors filed VETS-100 Reports in 2012. It is unlikely that any contracts still exist that would require the filing of VETS 100 Reports; accordingly, based on the number of contractors that filed annual VETS-100A Reports in 2012, VETS estimates that 15,000 contractors would file the proposed VETS-4212 Report.

For purposes of this analysis, VETS assumes all work would be performed by employer staff. VETS also assumes that contractors subject to the VETS-4212 reporting requirement would make adjustments to their human resources (HR) information systems to provide the data requested in the proposed VETS-4212 Report. VETS expects the burden hours and costs for making such adjustments will be greater for contractors that electronically file annual reports on veterans' employment than they will be for contractors that file paper versions of the annual report. VETS estimates it will take a Software Developer eight hours to make the one-time modification to the HR information system of a contractor that electronically files annual reports. In 2012, approximately 98% of contractors filed VETS-100A Reports electronically, and therefore VETS estimates that 98% or 14,700 contractors will electronically file the proposed VETS-4212 Report. Accordingly, the estimated burden for electronic filers to make the one-time change to their HR information systems is 117,600 hours. The estimated costs for the system modifications for electronic filers are based on data from the Occupational Outlook Handbook (OOH), which lists the 2010 median compensation of \$43.52 per hour for a Software Developer. VETS estimates the one-time implementation costs for electronic filers would total \$5,117,952.

With respect to contractors that file paper versions of the annual report on veterans' employment, VETS estimates that it will take a Human Resources Specialist two hours to make the one-time adjustment to the HR information system. The OOH lists \$25.33 per hour as the 2010 median compensation for a Human Resources Specialist. The estimated burden for the 300 paper filers to make one-time adjustments to their HR information systems is 600 hours, and the estimated cost is \$15,198. Thus, VETS estimates that the one-time implementation costs for contractors that are required to file the proposed VETS-4212 are \$5,133,150.

- Federal Contractors: 15,000
- Electronic Filings: 98% contractors filing electronically = 14,700
- Paper Filings: 2% contractors filing paper = 300
- Implementation Hours for software design: 8 Hrs. x 14,700 electronic filers = 117,600
- Implementation Hours for HR Specialist: 2 Hrs. x 300 paper filers = 600
- Hourly Rate for Software Designer: \$43.52
- Hourly Rate for Salary for HR Specialist: \$25.33
- Estimated One-time Costs: \$5,117,952 (electronic) + \$15,198 (paper) = \$5,133,150

Annualized over the three-year life expectancy of an OMB approval, the yearly time burden for the one-time adjustment would equal an estimated 39,400 hours and have a monetary equivalency of \$1,711,050.

**Recurring Annual Burden Calculation**

Table 1 shows 14,700 contractors filed 315,000 VETS-100A Reports in 2012. The proposed rule would require contractors with a contract of \$100,000 or more to file the proposed VETS-4212 Report for each of their hiring locations. Based on the number of VETS-100A Reports filed in 2012, VETS estimates contractors filing the proposed VETS-4212 Report will have 21 hiring locations on average.

**TABLE 1**  
**VETS-100 and VETS-100A Reports**  
**Filed in 2012**  
**OMB Number: 1293-0005**

TABLE 1 VETS-100 and VETS-100A Reports Filed in 2012 OMB Number: 1293-0005				
Submission from Federal Contractors	VETS- 100	VETS- 100A		Totals

<b>Total Respondents</b>	<b>6,000</b>	<b>14,700</b>		
<b>Total Annual Responses</b>	<b>75,000</b>	<b>315,000</b>		<b>390,000</b>
• Paper Response	1,500	6,300		7,800
• Electronic Response	73,500	308,700		382,200

### **Recurring Burden Calculations**

The proposed VETS-4212 Report requires fewer reportable items. The currently approved VETS-100A Report required under the existing part 61-300 regulations has 82 unique reportable items. The proposed VETS-4212 Report that would replace the currently approved VETS-100A Report has just 42 unique items—a reduction of nearly 50 percent. VETS estimates that it would take contractors 20 minutes (a reduction of 10 minutes per report) to complete and electronically file the proposed VETS-4212 Report and 40 minutes (a reduction of 20 minutes per report) to complete a paper version of the proposed VETS-4212 Report.

As shown in Table 2, VETS estimates that it would take 124,950 burden hours annually to file electronic and paper versions of the VETS-100A for one year (covering the 2014 filing season) and VETS-4212 Report for the two remaining years of the requested three-year approval. VETS assumes Human Resources Specialists would prepare and file the reports, and based on their 2010 median compensation of \$25.33 per hour, VETS estimates that the annualized time value costs for filing the Federal Contractor Veterans' Employment Report would total \$3,164,984.

**TABLE 2**

<b>Estimated Burden Hours and Monetary Equivalent for Filing the Proposed VETS-4212 Report</b>	
Submission from Federal Contractors	Total VETS-100 Reporting
Total Respondents	15,000
Recurring Annual Responses (Avg. 21 Reports per Contractor)	(15,000 x 21) = 315,000



• Paper Response 2% of Total Responses	(2% x 315,000) = 6,300
• Electronic Response 98% of Total Responses	(98% x 315,000) = 308,700
Recurring Burden Hours 3-Year Average*	124,950
• <i>Filing Burden Monetary Equivalent Subtotal</i> (124,950 x \$25.33)	\$3,164,984
<i>One Time Implementation Burden Hours Subtotal</i>	118,200
<i>One Time Implementation Amortized Burden Hour Monetary Equivalent Subtotal</i>	\$1,711,050
<b>Annualized Burden Hours Grand Total (three-year average)</b>	<b>164,350</b>
<b>Total Annualized Monetary Equivalent</b>	<b>\$4,423,893</b>

\* Weighted average response time for the VETS-4212 Report is 20.4 minutes (40 minutes for 2 percent of responses and 20 minutes for 98 percent of responses). This average for the VETS-100A Report is 30.6 minutes (60 minutes for 2 percent of responses and 30 minutes for 98 percent of responses)

As the VETS-100A Report will be continued for the 2014 filing season, the three-year average for this ICR is calculated as follows:

[VETS-100A (1 year x 315,000 responses x 30.6 minutes) + [VETS 4212 (2 years x 315,000 responses x 20.4 minutes)]/60 minutes per hour/3 years = 124,950 hours.

### 13. Annual Cost Burden for Maintaining and Providing the Information Collection

The information contractors report about their veterans' employment is collected and maintained in the normal course of business and to comply with other Federal requirements (e.g., Office of Federal Contract Compliance Programs Recordkeeping and Reporting Requirements under the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, approved under control number 1250-0004.) There are no requirements for contractors to have any kind of equipment to be able comply with this collection of information.

In addition, VETS recognizes that the 300 contractors that file paper versions of the proposed VETS-4212 Report will have operational costs to cover paper and mailing expenses. Agency experience indicates that a contractor that mails responses will send responses for each individual location and will do so in a single mailing; consequently, for purposes of this ICR, the agency has counted each mailing as transmitting 21 responses. VETS estimates that it will cost contractors approximately \$.08 for an average of 21 pages per contractor to print and/or copy the proposed VETS-4212 Report. The estimated cost would be \$504 (21 x \$.08 x 300 = \$504). In addition, VETS estimates an average mailing cost of \$1.92 for each submission. The estimated cost for mailing would be \$576 (300 contractors x \$1.92 = \$576). Accordingly, Table 3 shows the total estimated annual operations and maintenance costs would be \$1,080.

**Table 3**

<b>Estimated Operational Costs for Filing</b>	
Submission from Federal Contractors	Total Reporting
Total Respondents	15,000
Total Annual Responses (Avg. 21 Reports per Contractor)	15000 x 21 = 315,000
<ul style="list-style-type: none"> <li>Paper Response 2% of Total Responses</li> </ul>	2% x 315,000 = 6,300
<b>Annual Operations and Maintenance Costs</b>	(6,300 sheets x \$0.08) + (300 mailings x \$1.92) = <b>\$1,080</b>

**14. Annualized Costs to the Federal Government**

The cost to the Federal government for the proposed information collection includes the following components:

Staff: \$ 25,000 (25% of 1 FTE including benefits)

Contract for processing forms: \$700,000

Total: 725,000

**15. Changes in Burden Hours**

As Table 4 shows, after the first year, the NPRM is expected to reduce burden from the currently approved 199,350 to 107,100 total annual burden hours (a decrease of 46 per cent). The reduction in burden hours comes from two sources: the proposed rescission of the part 61-250 regulations and elimination of the VETS-100 reporting requirement, and the reduction in the number of unique items the contractor would be required to complete on the proposed VETS-4212 Report.

**Table 4**

<b>Burden Hours Currently Approved VETS-100/100A Reports OMB Control No. 1293-0005</b>			
Submission from Federal Contractors	VETS-100 Filed in 2010	VETS-100A Filed in 2010	Totals
Total Respondents	9,200	13,700	
Total Annual VETS-100			

Responses	142,000	251,300	393,300
• Paper Response	700	4,700	5,400
• Electronic Response	141,300	246,600	387,900
Burden Hours			
• Paper (1.0 of an hr. x Response)	700	4,700	5,400
• Electronic (0.5 of an hr. x Response)	70,650	123,300	193,950
<b>Total Filing Burden Hours</b>	<b>71,350</b>	<b>128,000</b>	<b>199,350</b>

Table 5

<b>Annualized Burden Change Summary Based on Three-Year ICR Approval</b>		
<i>Category</i>	<i>Responses</i>	<i>Hours</i>
Current	393,300	199,350
Requested	315,000	164,350
Difference	(78,300)	-35,000

The reduction in the number of reportable items is expected to reduce the time it takes to complete and file the annual report on veterans' employment. VETS estimates that it would take contractors 20 minutes (a reduction of 10 minutes per report) to complete and electronically file the proposed VETS-4212 Report and 40 minutes (a reduction of 20 minutes per report) to complete a paper version of the proposed VETS-4212 Report.

VETS has reconsidered whether this information collection imposes operational costs on contractors that mail their responses; consequently, while this collection may actually reduce such costs, the fact that paper and mailing was previously not included results in a non-discretionary adjustment in the estimated cost of \$1,080 per year. While not reflected in the reginfo.gov database, Table 6 shows that, once fully implemented, over a ten-year period the proposed rule is expected to save Federal contractors approximately 804,300 burden hours and about \$18,233,780 in salary equivalent burden costs.

Table 6<sup>1</sup>

<b>Estimated Burden Hours and Costs</b>			
Submission from Federal Contractors	Currently Approved Burden Hours	VETS-4212 Estimate	Change in Estimated Burden Hours and Costs
<b>Burden Hours</b>			
• Annual Burden Calculation	199,350	107,100	(92,250)

<sup>1</sup> Some calculations may not exactly match due to rounding.

• One-Time Implementation Burden Hours	0	118,200	118,200
First-Year Burden Savings	199,350	225,300	25,950
Burden Savings After Year One	199,350	107,100	(92,250)
<b>Monetized Burden Hours Costs</b>			
• Annual Recurring Salary Equivalent (Monetized Burden Hours) Costs and Savings (\$25.33) <sup>2</sup>	\$5,049,536	\$2,712,843	(\$2,336,693)
• One Time Implementation Burden Costs and Savings	\$0	\$5,133,150	\$5,133,150
First-year Salary Equivalent Burden Costs and Savings	\$5,049,536	\$7,845,993	\$2,796,457
Salary Equivalent Costs and Savings After Year One	\$5,049,536	\$2,712,843	(\$2,336,693)
<b>Three-Year Annualized Change in Responses</b>			<b>(78,300)</b> (Discretionary due to rule change)
<b>Three-Year Annualized Change in Burden Hours</b>			<b>(35,000)</b> (Discretionary due to rule change)
<b>Three-Year Annualized Change in Other Burden Costs</b>			<b>1,080</b> (Non-Discretionary change in estimate)
<b>Ten-Year Burden Hour Savings</b>			(804,300) (Discretionary)
<b>Ten-Year Salary Equivalent Cost Savings</b>			(\$18,233,780) (Discretionary)

<sup>2</sup> The Supporting Statement for VETS-100/100A Reports (OMB No. 1293-0005) reauthorization in 2011 for the current approval contains estimated salary equivalent burden costs that are based on the \$16.00 hourly compensation of an unspecified contractor employee. The \$25.33 per hour median compensation for a Human Resources Specialist is used to calculate the salary equivalent burden costs in this analysis. In order to calculate the change in salary equivalent costs resulting from the proposed rule, VETS has used the \$25.33 hourly compensation of the HR Specialist to calculate the salary equivalent burden cost for the currently approved burden hours. This allows for a head-on comparison to compare costs and benefits in analyzing this rule.

**16. Publication of Results of the Information Collection**

As required by the reporting provisions under VEVRAA made by the Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012, (Pub. L 122-154). Section 708 of the Camp Lejeune Families Act requires VETS to publicly disclose the information reported annual reports on veterans' employment, which is currently being made available on data.gov.

**17. Approval Not to Display Expiration Date for OMB Approval**

VETS will display the expiration date for OMB approval.

**18. Exceptions to the Certification Statement for Paperwork Reduction Act Submission**

No exceptions to the certification statement were identified.

**B. Collection of Information Employing Statistical Methods**

The information collection does not employ any statistical methods.