Honoring Investments in Recruiting and Employing American Veterans (HIRE Vets)
Medallion Program
OMB Control No. 1293-0015

Justification for Nonmaterial Change

The request to amend the above referenced information collection is so VETS can make some clarifying changes to the information collection instruments based on its experience with the Calendar Year (CY) 2018 HIRE Vets Medallion Program Demonstration, and to remove the information collection instruments that are associated with the Program Demonstration.

Forms

1. <u>Replacing generic references to a year with specific calendar years</u>: Throughout all of the information collection instruments, VETS is substituting phrases that require an applicant to calculate a year (e.g., "the calendar year preceding the preceding calendar year") with a statement of the actual year (e.g., "2017"). Through the CY 2018 HIRE Vets Medallion Program Demonstration, VETS discovered that applicants were not accurately reading or calculating these generic references to a year. Making such clear statements of the referenced year also allows VETS to remove language providing examples of how to make the referenced calculation throughout the information collection instruments. These changes will require VETS to modify the information collection instruments each year to refer to the correct years. VETS requests OMB approval to treat changes to the calendar year references on the application forms in future years as a de minimis change that does not require OMB approval each year. The application fields/item numbers in which these changes have been made for each form are indicated below:

    a. Small Gold
        i. Form – Items 10, 12 through 16, 18, 19
        ii. Instructions – No changes
    b. Small Platinum
        i. Form – Items 10, 12 through 16, 18, 19
        ii. Instructions – Items 21 through 25
    c. Medium Gold
        i. Form – Items 10, 12 through 16, 18, 19
        ii. Instructions – Items 21 and 22
    d. Medium Platinum
        i. Form – Items 10, 12 through 16, 18, 19
        ii. Instructions – Items 21 through 25

      e. Large Gold
           i. Form – Items 10, 12 through 16
          ii. Instructions – Items 18 and 19

      f. Large Platinum
           i. Form – Items 10, 12 through 16
          ii. Instructions – Items 18 through 22

2. <u>Attestation Information – Name (Large Platinum, Medium Gold – Item 25; Large Gold – Item 22; Medium Platinum, Small Platinum – Item 28; Small Gold – Item 23)</u>: VETS is changing this field label from "Name" to "First and Last Name" to help applicants better understand that this field must contain a complete name.

3. <u>Change in presentation of Attestation Title field on electronic applications (Large Platinum, Medium Gold – Item 26; Large Gold – Item 23; Medium Platinum, Small Platinum – Item 29; Small Gold – Item 24)</u>: Rather than providing a blank field in which applicants are required to enter a title in the Attestation Information section of the application, VETS is changing the electronic application to instead present a dropdown menu from which the user can select "Chief Executive Officer," "Chief Human Relations Officer," or "Equivalent Official." If the applicant selects "Equivalent Official," an "Equivalent Official Title" field will appear prompting the applicant to enter a title. The "Equivalent Official Title" field will include the following instruction: "An equivalent official is someone with responsibilities and duties equivalent to the CEO or CHRO, such as the owner of a small business." The CY 2018 HIRE Vets Medallion Program Demonstration revealed that applicants often entered an inappropriate attestation title (i.e., impermissible because it was a title that referenced a position that would not have "responsibilities and duties equivalent to the CEO or CHRO"). VETS believes that the changes to the presentation of this Attestation Title field on the electronic application will make it more likely that an applicant will understand the requirements for this field.

4. <u>Form instructions – introductory language</u>: VETS is removing from each information collection instrument the text in the introductory language of the application form instructions that specifies that an applicant must ensure that the "employer did not receive an award in the previous calendar year. Employers who received an award in the previous calendar year are not eligible for an award." This language is not applicable for the CY 2019 HIRE Vets Medallion Program due to a statutory amendment to the HIRE Vets Act in Division H, Title I of the Consolidated Appropriations Act, 2018 (H.R. 1625).

5. <u>New electronic application alert for very short responses</u>: To encourage applicants to provide sufficient descriptive information in the application responses that require a narrative description of required award criteria, VETS is adding an alert for these fields where an applicant enters a response that is less than 75 characters.

6. Underlined New electronic application text for Items 10 (Employer Size) and 11 (Medallion Level): VETS is adding text for these items in the electronic version of the application to clarify what applicants must do if their response to either of these items is "No" rather than "Yes" (new text is indicated by italicized text below).

    a. Item 10 (Employer Size): Did you have [EMPLOYEE NUMERIC RANGE ASSOCIATED WITH RELEVANT EMPLOYER SIZE] employees as of December 31 of 2018 (the year prior to the year in which you are submitting the application)? *If No, return to your Dashboard, delete this application and begin a new one for the correct size.*

    b. Item 11 (Medallion Level): Are you applying for the [RELEVANT AWARD LEVEL] level? *If No, return to your Dashboard, delete this application and begin a new one for the correct level.*

7. Minor technical changes and stylistic edits: In addition to the changes to specific items as described above, VETS is making some minor technical edits to wording for purposes of accuracy (e.g., to ensure that phrasing on the forms aligns with that used in the HIRE Vets Medallion Program regulations). VETS also is making other non-substantive, stylistic edits to the text on the application forms (e.g., capitalization, punctuation, spacing) for purposes of clarification and consistency.

Account Creation Page

The account creation page, which requires the user to register for an account by providing certain information before the user can access the electronic version of the information collection instruments (i.e., before an employer can begin to fill out an application form), previously required the following fields: first name, last name, employer name, and email address.

VETS is adding Phone Number as an additional required field and Employer Phone Number (as an optional field) on the account creation page to provide VETS with additional methods for contacting an applicant about the HIRE Vets Medallion Program or the employer's application.

VETS is also removing text from the account creation page encouraging users to participate in the initial, no fee, CY 2018 Program Demonstration, as the collection of applications for the Program Demonstration has concluded.

Pay.gov Integration Screenshots

VETS is adding to the information collection instrument list screenshots from the electronic

application that illustrate the user experience after the applicant has submitted its application and the application system prompts the applicant to complete a payment form, either on HIREVets.gov or on Pay.gov, to provide the relevant application fee based on employer size. See Application Fee Payment item on paper applications (Large Platinum, Medium Gold – Item 30; Large Gold – Item 27; Medium Platinum, Small Platinum – Item 33; Small Gold – Item 28). When OMB first approved this information collection, VETS had not yet built out the electronic application system to include payment. Now that it has, VETS is including those screenshots to illustrate that part of the user experience.

Removal of HIRE Vets Medallion Program Demonstration Information Collection Instruments

In CY 2018, VETS engaged in a limited demonstration of the HIRE Vets Medallion Program voluntary recognition program, before initiation of the first HIRE Vets Medallion Award cycle. The CY 2018 HIRE Vets Medallion Program Demonstration accepted the first 300 successfully submitted applications. The Department of Labor will recognize those employers successfully meeting award criteria described in the HIRE Vets Medallion Program Regulations[1] *with the exception that* no fee was required for the CY 2018 HIRE Vets Medallion Program Demonstration. Given that the collection of applications for the Program Demonstration has concluded, VETS is removing the HIRE Vets Medallion Program Demonstration information collection instruments from the approved information collection.

Supplementary Information Provided to Applicants

VETS is uploading into the supplementary documents for the approved information collection a collection of email text that VETS will use when contacting certain applicants to remind them of a need for action on their application at certain points during the application process and another document that provides sample acceptable application entries for the application criteria that require a narrative explanation from the applicant (i.e., "Examples of Excellence: Integration Assistance Criteria"). The CY 2018 HIRE Vets Medallion Program Demonstration confirmed VETS' understanding that repeated contact with applicants was ideal to prompt action to provide additional information when needed to continue the processing and evaluation of their applications. These additional touchpoints, therefore, increase the likelihood that VETS will be able to grant applicants a HIRE Vets Medallion Award. As for the Examples of Excellence, the applications during the Program Demonstration revealed that applicants will benefit from examples of how they could construct their narrative responses to demonstrate that the applicant has met the relevant award criteria. These sample answers are agency-developed examples of what VETS will consider an acceptable application response.

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[1] 20 CFR part 1011. *See* HIRE Vets Medallion Program Final Rule, 82 FR 52186 (Nov. 13, 2017).