

Comment on Proposed Renewal of Information Collection Request; U.S. Department of Labor  
Office of Federal Contract Compliance Programs Recordkeeping Requirements—38 U.S.C. 4212  
Vietnam Era Veterans' Readjustment Assistance Act of 1974, As Amended

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Comment: I submit this comment in support of renewing (and fully enforcing) the reporting and recordkeeping requirements of VEVRAA. I have more than 25 years in Talent Acquisition for Fortune 500 companies/clients, including senior leadership roles in DEI...which often included veteran hiring. I have seen first-hand how many of these programs are aspiration, well-intended and "best effort", but rarely are truly intentional with accountability and measurable outcomes. I believe intent matter, but results matter more. Companies talk about veterans and great employees they become. Yet veterans are disproportionately hired into entry-level or labor roles. Professional, technical and management positions remain largely inaccessible. Promises made and hiring benchmarks missed year over year with little to no consequence. Transparency and recordkeeping are not punitive and provide the only mechanism for enforcement, which should determine outcomes...especially for those companies that benefit from federal contracts. I think VEVRAA is in place to ensure fairness, access and accountability, not performative compliance. I believe that veteran employment is not about goodwill, but an effective talent strategy. I would encourage the Dept of Labor to renew and maintain its' robust enforcement, reporting and accountability mechanisms under VEVRAA.