



December 31, 2004

Paul Robertson  
Regulatory Specialist  
Office of Agency Management and Budget  
Veterans' Employment and Training Service  
U.S. Department of Labor  
200 Constitution Ave., NW.  
Room S-1312  
Washington, DC 20210

**RE: Federal Contractor Veterans' Report VETS-100**

Dear Mr. Robertson:

This letter responds to the invitation for written comments by the Veterans' Employment and Training Service (VETS) on the Federal Contractor Veterans' Employment Report VETS-100 as published in the Federal Register on November 1, 2004.

**Background - Maly Consulting LLC**

Maly Consulting (originally founded as Maly & Associates in 1986) is a management consulting firm located in San Rafael, California. We specialize in the analysis and reporting of human resource data, affirmative action compliance, and OFCCP audits. The majority of our clients are federal government contractors and range in scope from large, multi-national corporations to smaller organizations of 100+ employees nationwide. We assist clients in understanding and complying with the federal regulations for affirmative action, including Executive Order 11246, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, and Section 503 of the Rehabilitation Act of 1973. Our firm has analyzed data for and developed thousands of Affirmative Action Programs (AAPs) over the 18 years that we have been in business. We have assisted many clients with compiling their data for OFCCP audits, EEO-1 reports, VETS-100 reports, and EO Surveys. We are keenly aware of the high costs and organizational burdens imposed on our clients by confusing and unnecessary reports.

**Focus of Our Comments**

The notice to extend current collection of the VETS-100 Report requested comments on the utility and burden of the report. In summary, while we support all necessary efforts to prevent discrimination toward veterans, we agree with the 2003 commentary and recommendation of the Advisory Committee on Veterans' Employment and Training that the VETS-100 Report is useless and should be discontinued.

### **The VETS-100 Report Is Neither Necessary Nor Useful**

There is no indication that the information collected by this report has any practical utility. That is, the background information provided in the Federal Register by VETS states only that the VETS-100 Report is used to facilitate reporting and we are not aware of any current use of this information by the agency.

### **The Burden On Contractors Is Much Greater Than Estimated**

The estimated average time per response of 30 minutes is absurdly low. First, the VETS-100 Report currently requires the collection of data on Other Protected Veterans, a category of veterans not collected for any other purpose. This additional data requirement means changes to contractors' forms and information systems that would not otherwise be necessary. Second, the VETS-100 Report requires the additional burden of a confusing and inconsistent calculation of the maximum and minimum number of employees during the period of the report. Because there is no single required method for determining the maximum and minimum number of employees, the collection of this information can serve no possible purpose and has caused a great deal of contractor consternation.

### **Summary and Conclusion**

The VETS-100 Report serves no discernable purpose and presents a substantial burden on contractors. Therefore, we second the recommendation of the Advisory Committee on Veterans' Employment and Training that the VETS-100 Report be discontinued.

Sincerely,



Edward Corrao  
Consultant

ETC/AMM/SA/GS