

PUBLIC SUBMISSION

As of: 9/19/17 7:38 AM Received: September 18, 2017 Status: Posted Posted: September 19, 2017 Tracking No. 1k1-8yqq-hfer Comments Due: September 18, 2017 Submission Type: Web

Docket: VETS-2017-0001
HIRE Vets Medallion Program

Comment On: VETS-2017-0001-0001
HIRE Vets Medallion Program

Document: VETS-2017-0001-0020
Comment on FR Doc # 2017-17249

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General Comment

Definition of Veteran: For the purpose of eligibility, the public law uses a very narrow definition for veteran under 38 U.S. Code 101. In implementation, the narrow definition casts a relatively small net, considering there are many National Guard members that mobilize under Title 32 who fall outside of Title 38 definition of veteran. In fine-tuning the public law into regulatory text, it is permissible for the Secretary to consider increasing the scope of the definition of veteran for the purposes of making this program equitable for all our service members who have been called to active-duty in service of the nation. Doing so will also ensure that employers have a wide pool of candidates to select from. If the Secretary will allow modifications or exceptions to the definition of veteran under 38 U.S. Code 101, we would ask that the definitions should be clearly defined as to not cause too much confusion for the employers.

Under Public Law No: 115-31, The Secretary has been given broad statutory authority to implement additional criteria with which to determine qualifications for receipt of each level of

HIRE Vets Medallion Award. We offer these alternative and additional criteria for consideration:

1. Percentage of Employees who are Veterans: The percentage of employees that are veterans does not always correlate with the effort that goes into a veterans hiring initiative; therefore this criterion favors employers with already established programs and does not recognize employers who are attempting to start hiring efforts.

For the employer with nascent veteran hiring programs, there should be an additional alternative criterion weighing the number of veterans who are applying. This number is a genuine reflection of the effort an employer places in branding, marketing and outreach to the military/veteran community. Further, this number can be tracked to show progress throughout the years.

2. Percentage of Veteran Employees who are Retained: The retained percentage should be compared to the number of actual hires. In the application, the company should additionally present the number of hires along with the number of veterans retained within a given timeframe.

3. Establishment of Assistance and Training Programs: The regulatory text should explicitly list which programs constitute as "assistance" or "training" programs. If the Secretary decides to make this a broad category, our suggestion would be to merge the establishing of internal organizations such as a veteran resource or support group into the requirements of establishing an assistance or training program. In which case the percentage of veteran employees enrolled in the internal organization could be the other weighted criterion.

4. 6 Month Onboarding Standard Operating Procedures: One additional criterion to consider is the drafting of procedural descriptions of the onboarding process for a veteran candidate from start of application to 6 months after hire.

5. Small and Medium sized employers: The criteria should apply to all applicants regardless of size.