



ACQUISITION AND
TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON DC 20301-3000



July 8, 1996

DP/CPA

MEMORANDUM FOR DIRECTOR, ACQUISITION PROGRAM INTEGRATION
ATTN: DEPUTY DIRECTOR, ACQUISITION RESOURCES

SUBJECT: National Defense Appropriations Act for FY 97

Pursuant to your request of June 25, 1996, I submitted a package of appeal items dated July 3, 1996, for the conferees on the National Defense Appropriations Act for FY 97. Our review was based on H.R. 3610 as passed by the House and S. 1894 as reported out by the Senate Committee on Appropriations.

Attached is an additional appeal that was inadvertently excluded from the first package (section 8099 of H.R. 3610, Annual Submission of Report to Department of Labor Concerning Employment of Certain Veterans). Also attached is a one paragraph synopsis of the appeal as requested by API/CAIR.


Eleanor R. Spector

Director, Defense Procurement

Attachment

CC:
API/CAIR



USD(A&T)DP
FY 1997 Defense Appropriations Bill Appeal

Appeal Subject: Annual Submission of Report to Department of Labor (DOL) Concerning Employment of Certain Veterans

Language/Provision: Section 8099 of H.R. 3610 would prohibit DoD from entering into or renewing contracts with any entity which is found to have not filed the annual report required in section 4212(d) of title 38, United States Code, concerning the employment of certain veterans, with the Secretary of Labor.

DoD Position: This provision imposes a draconian punishment on DoD contractors for failure to file a statistical report with a federal agency over which DoD has no control (DOL). Debarment of contractors, which would be the effect of this provision for those found in violation, is normally reserved for serious offenses involving purposeful violation of laws and is solely intended to protect the government from doing business with irresponsible firms. Such offenses include fraud, knowingly providing defective material, bribery and other actions which generally result in criminal charges. Failure to file a statistical report with the DOL is not such an offense. This provision would both devalue the effect of the suspension and debarment system and provide ammunition to those who claim the system is used for simple punishment and not to protect the government's interests by not doing business with firms lacking present responsibility. In addition, the sanction envisioned by this provision would prevent DoD from contracting with firms that might otherwise have provided the most cost effective products and services for what may essentially be an oversight. The DOL currently has the ability to enforce 38 USC 4212 without additional legislation. An alternative approach to this provision would be one which establishes in law or conference report what Congress believes to be an appropriate monetary fine for failure to submit the reports in a timely manner. This would also hold DOL responsible for enforcement, rather than having DoD being an intermediary.

The Department urges the provision be excluded.

POC: Steve Slavsky; OUSD(A&T)DP/CPA; 697-8335

Steve Dotson
DoD Investment

USD(A&T)DP
SYNOPSIS OF FY97 DEFENSE APPROPRIATIONS BILL APPEAL ITEMS

Annual Submission of Report to Department of Labor (DOL)
Concerning Employment of Certain Veterans: Section 8099 of H.R. 3610 would prohibit DoD from entering into or renewing contracts with any entity which is found to have not filed the annual report required in section 4212(d) of title 38, United States Code, concerning the employment of certain veterans, with the Secretary of Labor. This provision imposes a draconian punishment on DoD contractors for failure to file a statistical report with a federal agency over which DoD has no control (DOL). The sanction envisioned by this provision would prevent DoD from contracting with firms that might otherwise have provided the most cost effective products and services for what may essentially be an oversight.

**Department of Defense Appeal
FY 1997 Defense Appropriations Bill**

Subject: Employment of Certain Veterans

Language/Provision: Section 8099 of the House Bill would prohibit DoD from entering into or renewing contracts with any entity which is found to have not filed the annual report required in section 4212(d) of title 38, United States Code, concerning the employment of certain veterans, with the Secretary of Labor.

DoD Position: This provision imposes a draconian punishment on DoD contractors for failure to file a statistical report with a federal agency. Debarment of contractors, which would be the effect of this provision for those found in violation, is normally reserved for serious offenses involving purposeful violation of laws and is solely intended to protect the government from doing business with irresponsible firms. Such offenses include fraud, knowingly providing defective material, bribery and other actions which generally result in criminal charges. Failure to file a statistical report with the Department of Labor (DOL) is not such an offense. This provision would both devalue the effect of the suspension and debarment system and provide ammunition to those who claim the system is used for simple punishment and not to protect the government's interests by not doing business with firms lacking present responsibility. In addition, the sanction envisioned by this provision would prevent DoD from contracting with firms that might otherwise have provided the most cost effective products and services for what may essentially be an oversight. The DOL currently has the authority to enforce 38 USC 4212 without additional legislation.

The Department urges exclusion of this provision.

SECTION 8099 OF H.R. 3610

- This provision would prohibit DoD from entering into new contracts with firms that are found to have not filed an annual VETS-100 report with the Department of Labor (DOL). The VETS-100 report includes the number of special disabled veterans and Vietnam era veterans in the workforce of the contractor and the number of new employees hired by the contractor that are in these two categories.
- Currently, DOL is responsible for the receipt and evaluation of the VETS-100 report. DOL can take action against contractors not filing the report, including suspension or debarment from federal contracting. DOL can also report non-filers to DoD, which can query the non-filing company and use this information in its evaluation of the firm's overall performance.
- Under the proposed legislation DoD becomes the enforcer of a DOL requirement and is penalized by not being able to acquire defense equipment if a DOL report is not filed. DoD is not staffed to investigate non-submission of DOL reports and cannot agree to a provision that would prevent us from performing our defense mission.
- The impact of this legislation is likely to be on smaller businesses that do not have the administrative oversight of their unique government contractual report filing requirements. Effective debarment of these businesses would be devastating to the employment of the very veterans this action is purported to be assisting.

DoD strongly opposes this legislation.



Office of Federal Contract Compliance Programs
October, 1996

Cases Involving Equal Employment Opportunities for VETERANS

OFCCP WORKING FOR YOU

Honeywell Inc., in Houston, TX agreed to pay \$36,970 as part of a settlement for one Vietnam era Veteran employee because of disparate treatment. The conciliation agreement, resolves a discrimination practice that was discovered when a complaint was filed under the Vietnam Era Veterans Readjustment Act of 1974.

Seattle Cit Light, in Seattle, Washington has signed a conciliation agreement and has agreed to a settlement of \$72,743 to cover back pay, training costs and a managerial position for a disabled veteran, for wages not paid while working as a material supplier. Under the terms of this agreement, Seattle City Light will budget a minimum of \$20,000 to train its managers on affirmative action plan obligations and to establish the position of manager of veterans' affairs with an annual salary rate of \$42,699 - 49,861.

DynCorp, in Alabama signed a conciliation agreement on behalf of a Vietnam Era Veteran. The complaint was settled for more than \$40,000 in backpay, benefits and interest. The compliance review revealed alleged discrimination against a veteran.

Linkage Agreements

- As part of a compliance review, OFCCP provides guidance to contractors on the resources available in the community that can assist the contractors in meeting their affirmative action obligations. OFCCP facilitates working relationships or linkages between contractors and specific community recruitment, referral, and training resources to help fill identified employment deficiencies.

During fiscal year 1995, contractors reported that the following hiring activity resulted from linkage arrangements included in conciliation agreements:

- * Bhandari Contractors of West Haven, CT reported hiring a veteran as a Laborer and a Mason at combined salaries of \$107,848.
- * Pike Industries of Burlington, VT reported hiring a Vietnam veteran as a Water Trucker at \$20,800.

- * DFC Foods Corporation in Bloomsburg, PA reported hiring two veterans for Maintenance Mechanics at \$9.50/hr.
- * Quest Best International Adjuntas, Puerto Rico reported hiring one Hispanic Vietnam Era Veteran at \$8,160 as a Service Worker.
- * Baxter Fenwal Division of Maricao, Puerto Rico reported hiring two Hispanic Vietnam Era Veteran's for Manager and Technician positions at combined salaries of \$72,000.
- * Fountain Powerboats in Washington, NC reported 36 Vietnam Era veterans were referred and 21 were hired.
- * Aristech Chemical Corporation in Florence, NY oreported hiring two Vietnam Era Veterans with combined annual salaries of \$53,660.
- * Johnson Controls, of Fort Gordon, GA secured referrals from constituent linkage sources and hired two veterans and four persons with disabilities with annual salaries totalling \$99,311.

For further information about OFCCP, call (202) 219-9475 or access information from INTERNET @ [HTTP://WWW.dol.gov/dol/esa](http://www.dol.gov/dol/esa). For information about filing complaints, or compliance assistance, contact any of OFCCP's regional or district offices, or The OFCCP Ombuds Office @ 188-370-FCCP. Information is available in English and Spanish.

U.S. Department of Labor, Employment Standards Administration, Office of Federal Contract Compliance Programs; 200 Constituion Ave., NW Rm C-3325, Washington, DC 20210 (202) 219-9475 (202) 219-6195 fax

QUESTION AND ANSWER RE: OFCCP AFFIRMATIVE ACTION INITIATIVE AND ITS BENEFITS TO VETERANS

Q: According to Acting Deputy Secretary Metzler, the Office of Federal Contract Compliance Programs (OFCCP) is seeking \$7.25 million for an affirmative action initiative that will enable OFCCP to take the steps necessary to modernize its program through:

1. Streamlining regulations;
2. Providing expanded technical assistance to contractors and constituency groups
3. Implementing a tiered-review approach to compliance reviews.

How are veterans' concerns to be expanded under this new initiative?

A: With these funds, OFCCP will take necessary steps to modernize its program through its three-prong Fair Enforcement Strategy: streamlining regulations; expanded technical assistance to contractors and constituency groups and implementing a tiered-review approach to compliance reviews. The funds requested will be dedicated to expanded technical assistance to contractors and constituency groups and implementing an approach to compliance reviews that will enable OFCCP to focus on the contractors most in need of assistance and to devote fewer resources to those who are and have been in compliance with the Vietnam Era Veterans Readjustment Assistance Act, among other laws. The increased funding for technical assistance will also enable the agency to ensure that Federal contractors are fully aware of their responsibilities under the laws that OFCCP enforces. This is particularly important for smaller contractors who may not have the administrative capacity to maintain currency with changes in the regulations.

To ensure a quality program and consistent application of the laws, OFCCP will fund its newly-developed Training Academy, which provides courses to its compliance officers as the need arises. The training funds will be used to acquaint new compliance officers in the requirements to promote affirmative action and nondiscrimination policies and practices for veterans as well as women, minorities and the disabled. Additionally, the funds will support the replacement of outmoded systems hardware with more modern technology enabling OFCCP to meet its current requirements and to develop systems necessary for Federal contractors to submit data electronically for analysis by the program.

In addition, OFCCP is implementing the following actions to improve enforcement and administration of the VEVRAA requirements:

1. OFCCP developed a new brochure for distribution to the public to improve public awareness about the Vets program.
2. In partnership with the Employment and Training Administration and the Office of Assistant Secretary for Veterans Employment and Training Services, OFCCP is developing a coordinated information packet for distribution to the regulated community and to its beneficiaries.

3. OFCCP is modifying its regulation on mandatory job listings to include the phrase "list immediately" positions with the state employment services to improve veterans' access to priority consideration for positions for which they can qualify.
4. OFCCP is listing notices on the Internet Home Page with increased emphasis on listing requirements and priority consideration for general access to the public, enforcement staff, Veterans' Service Organizations and Federal contractors.
5. OFCCP is negotiating an agreement with the ETA to expand the use of technology for the distribution of information to job centers, VSOs and state employment service centers through the DOL-sponsored "America's Job Bank."
6. We (OFCCP) are also distributing specific notices to OFCCP staff to reaffirm the importance of increased attention to VEVRAA compliance.
7. Consistent with OFCCP's Customer Service Plan, OFCCP has also reaffirmed the rights of complainants, including veterans, to (a) understand the investigative process and the laws that protect them; (b) have the case assigned to a compliance officer in a timely manner and be kept apprised of the status of the complaint; and (c) be given an opportunity to discuss the complaint and OFCCP's reasons for its resolution of the complaint. In addition to the regional and district office staff, the newly-appointed OFCCP Ombudsperson will be available to provide assistance to veterans who need assistance on the complaint filing process and other aspects of the contract compliance program.

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The Washington Times

Lawmaker unveils plight of Vietnam veterans

Says college jobs given to others

By Carol Innerst
THE WASHINGTON TIMES

Higher education's "disaffirmative action" against Vietnam War veterans, who have equal status with women and racial minorities under affirmative action, is attracting attention on Capitol Hill and beyond the Beltway.

If Rep. Gerald B.H. Solomon of New York gets his way, no federal money will flow to institutions or other contractors that fail to file with the federal government a required report documenting whether veterans are employed at an appropriate level.

"It's disturbing to think that anyone would even consider discriminating against veterans, but I'm sorry to say that that's the case," said the nine-term GOP congressman. "And the Department of Labor has done little, if anything, to enforce the law."

"In some places, this discrimination is blatant and deliberate," he said. "At some of our largest and most prestigious universities, for example, it's estimated that only 1 percent of the employees are veterans."

Mr. Solomon said that one distinguished veteran with a doctorate in his field was invited for interviews with 80 schools, but contact was broken off by 76 of them when his military background was revealed.

"I know of no evidence that qualified vets of any era have been subject to discrimination by colleges," said David Merkwitz, spokesman for the American Council on Education, the umbrella lobbying group for higher education.

"Where colleges and universities have a special interest is student admissions and federal aid," he said. "We support affirmative action in hiring, but we haven't made extra efforts to address that aspect of it."

"Vietnam era veterans, and the handicapped, have equal status

with women and racial minorities under affirmative action regulations," reminded Alan Charles Kors, professor of history at University of Pennsylvania, who has long chafed at what he calls the "double standard" of institutions.

"You can't have it both ways if you're on the cultural left," Mr. Kors said.

Universities typically have detailed guidelines, statistics and enforcement mechanisms for affirmative action in hiring women and minorities, he said.

"When I was chairman of a search committee for arts and sciences at Penn, I had to fill out a whole set of forms about how many women and minorities were in the department and in the search," he said. "There was not a single space on any form for the disabled or Vietnam era veterans."

Mr. Solomon, who is chairman of the House Rules Committee, is attacking the "disaffirmative action" issue with an amendment he is attaching to appropriations bills. The rider added to H.R. 3610, for example, prohibits Depart-

ment of Defense funds to be expended if the contractor has not submitted an annual VETS-100 report to the Department of Labor.

The report is required of federal contractors and subcontractors with contracts over \$10,000. So far the rider has been hooked to four appropriations bills, all of which are in conference.

John Wheeler, a Washington lawyer and Vietnam veteran, and chairman of the committee responsible for getting the Vietnam Veterans Memorial on the Mall, expects legislation to help solve the "disaffirmative action" problem.

The V-100 form has been required since 1988, but Wellesley College has never filed it, the Labor Department told him in response to a request under the Freedom of Information Act.

"Vets across America ... interpret Wellesley's willful failure to file the form, after personal notice to you and a plea to you for respect toward vets, the values they embody, and the flag that symbolizes those values, as an 'in-

your-face' statement of a sharply negative attitude toward veterans and their values," Mr. Wheeler wrote in a July 1 letter to Wellesley College President Diana Chapman Walsh.

Data collected by the Center for the Study of Veterans in Society suggest that the "anti-military culture" of the academy led many colleges to stop hiring veterans once the VETS-100 report made them aware they were doing so, while others terminated veterans already in their employ, said R.W. Trewyn, a trustee of the group and a professor of biomedical statistics at Kansas State University.

Nearby Montgomery College employed a "reasonable" 5.3 percent of veterans, while the University of Pennsylvania had 0.9 percent and San Diego State University, 0.5 percent, in 1994, he said.

With Vietnam-era veterans constituting 6 percent of the civilian labor force nationally, "what term other than discrimination could one use to describe employment levels lower than 1 percent on many campuses?" he asked.

This includes the more than 33,000 who served in the U.S. armed forces. The 100th Infantry Battalion and the 442nd Central Postal Directory fought with honor in the European theater and became the most decorated unit of its size. More than 6,000 served with distinction with the Military Intelligence Service in the Pacific as linguists.

Although many Japanese-Americans were unjustly treated by the government because of wartime hysteria and prejudice, we want to show that there is no rancor in our hearts and that then as now we are proud and loyal Americans.

Individuals, organizations, foundations or corporations interested in supporting our cause can make tax-deductible contributions to the National Japanese American Memorial Foundation, 2828 Pennsylvania Ave., N.W., Suite 305, Washington, D.C., 20007. For further information, (202) 965-0691.

George M. Wakiji

Executive director, NJAMF
Dear George:

The sarge knows the contributions you have made to our great nation, and, in your name, he's donating \$100 to this endeavor. I also urge all veterans, as well as veterans service organizations and their membership, to support this patriotic memorial.

Stories of the heroism of Japanese-Americans during World War II are numerous and impressive. For instance, when a call went out for Americans of Japanese ancestry to volunteer for service as a demonstration of their loyalty, more than 3,000 men from Hawaii and 1,500 men from the mainland immediately responded. Many of the mainland volunteers were from families in internment centers, behind barbed wire.

In battles in Italy and elsewhere, the 100th met every military objective, overcoming enemy mine fields, tanks and artillery. They made bayonet charges, fought off countless counterattacks, and held the high ground. Their ferocity in action and determination to win against all odds led to their having such high casualties that they earned the nickname "The Purple Heart Battalion."

Their fame was dearly won, and more than 1,000 Purple Hearts were awarded during this period. Maj. James Gillespie, who commanded the 100th, stated: "They call themselves just plain Americans. . . . They have earned the right. . . . They are just as American as I am." The men of the 100th had proved that the loyalty of the U.S. soldiers of Japanese ancestry was beyond question.

Dear Sgt. Shaft:

In the early 1970s, a new personnel look, affirmative action, was coming into vogue. Sensing the impact affirmative action was already having in its short lifetime, Congress modified a 1972 veterans law to include this new concept with the Vietnam Era Veterans Readjustment Assistance Act of 1974.

In a study published that same

nificant improvements would be required if Labor was to assess the effectiveness of affirmative action for veterans.

Labor eventually created the VETS-100 report required of all federal contractors and subcontractors with contracts in excess of \$10,000. The first such report was due in 1988. It's curious that the VETS-100 failed to document the contractor's total number of employees, thereby making it impossible to determine whether veterans were employed at an appropriate level.

That fact was noted in a GAO report in 1993, so Labor may someday correct the deficiency.

As if these problems weren't enough, many federal contractors and subcontractors don't bother to file the VETS-100. Labor's inspector general reported early this year that the responsible enforcement officials don't know who the federal subcontractors are, much less whether they comply with the 1974 veterans law.

Beyond the IG report, colleges are notably lax in collecting veterans' employment data and filing the VETS-100. Harvard, where affirmative action employment practices were perfected in the early '70s, couldn't provide VETS-100s when asked in 1994; apparently, it hadn't filed any.

Worse yet, data collected by the Center for the Study of Veterans in Society suggests that many colleges stopped hiring veterans once the VETS-100 report made them aware they were doing so, while other colleges terminated veterans already in their employ. It makes one wonder: Where the VETS-100 is concerned, who cares?

R.W.T.

Milford, Ohio

Dear R.W.T.:

The sarge has always believed that the office of federal contract compliance programs in the Department of Labor has made the monitoring of veterans' affirmative-action programs a low priority. The GAO report and the data you have compiled reinforces this belief.

Secretary of Labor Robert B. Reich should be held accountable for the lackluster performance of his office of federal contract compliance programs.

Many colleges and universities have a long history of thumbing their noses at our nation's veterans. These schools of higher learning and their tenured truants willingly accept veterans' dollars while, at the same time, creating an atmosphere of hostility and disdain for their military service.

The sarge urges Congress to review academe's treatment of veterans, and while it is at it, it should also investigate why these hallowed halls have increased their tuition so outrageously that it puts college degrees out-of-reach for the average GI Joe and Jill.

• Send your letters to Sgt. Shaft, c/o John Fales, PO Box 65900, Washington, D.C. 20035-5900; fax to 301/622-3330; or send e-mail to Sgtshaft@tmn.com on the Internet.

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law's predecessor. Therefore, significant improvements would be required if Labor was to assess the effectiveness of affirmative action for veterans.

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Cir. 42 of Title 38
 Jeff Crandall (Viet. Vet.)
 OMB - Procurement

Office of Federal Contract Compliance enforces
 - off. action ^{to employ} for sp. disabl for Vets $\rightarrow$ ^{interactive} non-discrimination law - can't discriminate

Does VETS-100 merely require reply?

i.e. if report shows no/few lines $\rightarrow$ punishment?

Reply: #'s in total wkforce + #'s hired in recent yr

Alicia Jones, H. Nat'l Security

DOL did briefing for them

- only 6 items they report

DOL uses Commerce's base of contractors -

don't have access to subcontractors

DOL sends reminders

- DoD been trying to
 get th' hold raised
 on all contracts +
 off. action (from \$100k)

Solomon pushing bec of universities

Civilian Labor Force - CPS - 9/95 :

20-34 $\rightarrow$ 7.5
 35-44 $\rightarrow$ 15.9
 45-54 $\rightarrow$ 40.1
 55-64 $\rightarrow$ 50.1

Men

Total - All veterans in civ labor force = 13.1 %
 fed' l wkforce = 27.6 %

% of vets in male ⁽²⁰⁺⁾ civ labor force $\rightarrow$ 22.4%

