



TRANSMITTAL

**U.S. DEPARTMENT OF LABOR
Employment Standards Administration
Office of Federal Contract Compliance Programs**

Number: 282

Date: July 17, 2008

Notice/Other

1. **SUBJECT:** Good-Faith Initiative for Veterans Employment (G-FIVE).
2. **PURPOSE:** To outline the evaluation factors, processes, and procedures for implementing the G-FIVE Initiative.
3. **FILING INSTRUCTIONS:**

Holders of ADM and LEG Binders only: File this Notice with the attachment behind the "Other" tab in your Administrative Practices Binder.

District and Area Office EOSs and EOAs only:

File this Notice with the attachment behind the tab for ADM Directives in your FCCM Binder.

4. **OBSOLETE DATA:** None.
5. **DISTRIBUTION:** A, B (both hard copy and electronically); C (hard copy only).
6. **EXPIRATION DATE:** This directive remains in effect until superseded.

CHARLES E. JAMES, SR.
Deputy Assistant Secretary for
Federal Contract Compliance

DATE

**EMPLOYMENT STANDARDS ADMINISTRATION
U.S. DEPARTMENT OF LABOR
OFFICE OF FEDERAL CONTRACT COMPLIANCE PROGRAMS
WASHINGTON, DC 20210**

ADM Notice/Other

1. **SUBJECT:** Good-Faith Initiative for Veterans Employment (G-FIVE).
2. **PURPOSE:** To outline the evaluation factors, processes, and procedures for implementing the G-FIVE Initiative.
3. **BACKGROUND:** The Vietnam Era Veterans' Readjustment Assistance Act, as amended, 38 U.S.C. §4212 (VEVRAA), and its implementing regulations originally prohibited federal contractors from discriminating in employment and required them to take affirmative action to employ and advance in employment qualified special disabled veterans and veterans of the Vietnam era. Statutory amendments made in 1998, 2000, and 2002 modified VEVRAA's coverage to include other protected veterans (veterans who served on active duty or in a campaign or expedition for which a campaign badge has been authorized), recently separated veterans, Armed Forces service medal veterans, and all veterans with service-connected disabilities.¹ According to a recent study conducted by the Bureau of Labor Statistics, as of August 2007, the total estimate of the veteran population was 22.6 million.² Under VEVRAA's implementing regulations (41 CFR Part 60-250 and 60-300), federal contractors and subcontractors agree to take affirmative action to employ, advance in employment, and otherwise treat qualified individuals without discrimination based on their status as a covered veteran.

The Good-Faith Initiative for Veterans Employment (G-FIVE):

- Reaffirms OFCCP's commitment to ensure compliance with the requirements of VEVRAA;
- Recognizes companies' "best practices" for the employment and advancement of veterans.
- Creates an incentive for federal contractors and subcontractors to increase their employment of and affirmative action for covered veterans; and,
- Strengthens VEVRAA partnerships between OFCCP and other agencies and veterans groups.

No additional Paperwork Reduction Act (44 U.S.C. 3501-3520) burden hours are created by the G-FIVE Initiative as the federal contractors and subcontractors eligible for the

¹ The Veterans Employment Opportunities Act of 1998, the Veterans Benefits and Health Care Improvement Act of 2000, and the Jobs for Veterans Act enacted in 2002.

² Employment Situation of Veterans 2007. Available online: [www. http://www.bls.gov/news.release/vet.toc.htm](http://www.bls.gov/news.release/vet.toc.htm).

Initiative are already required to maintain records in accordance with 41 CFR Part 60 and those records would address all applicable evaluation criteria. Contractors are not required to prepare any additional paperwork in order to be eligible.

In addition, in this Initiative, reference to the G-FIVE contractors and subcontractors applies to only individual establishments, not the company in totality.

4. **GUIDELINES:** This Administrative Notice transmits the procedures that initiates and promotes the G-FIVE Initiative.

a. National Office Initiatives:

- i. Announce the G-FIVE Initiative by official press release from the OFCCP Deputy Assistant Secretary.
- ii. Develop a G-FIVE informational section on the OFCCP web site.
- iii. Post G-FIVE Frequently Asked Questions (FAQs) on the OFCCP web site.
- iv. Develop G-FIVE compliance assistance materials and conduct Webinars for internal OFCCP staff, federal contractors, and other stakeholders about the G-FIVE Initiative.
- v. Form partnerships with other government agencies to identify “best practices” that increase the employment of VEVRAA-covered veterans, including, but not limited to, sharing the information contained in the VETS-100, VETS 100A, and any subsequent reports.
- vi. Use information from the Region’s weekly activity reports to track the progress of the G-FIVE Initiative.
- vii. Create an annual (fiscal year) summary report regarding the Initiative’s benefits, best practices, and lessons learned to be included in the OFCCP Compliance Assistance “end of year” progress report and DOL’s Performance and Accountability Report.
- viii. Research the feasibility of using the VETS-100, VETS-100A, and any subsequent report data to evaluate trends in hiring and promoting covered veterans.

b. Regional, District, and Area Office Initiatives:

- i. Establish or reaffirm OFCCP’s partnerships with state and local employment service agencies by requiring the following:

- Within 45 days of the signing of this Directive, OFCCP Area and District offices staff will meet and/or conduct a conference call with their local employment service delivery system agencies to discuss:
 - Equal Employment Opportunity and Affirmative Action requirements outlined in 41 CFR Part 60-250 and 60-300, and the differences between these regulations. (Offices may use the JVA Frequently Asked Questions, located on the OFCCP website at: <http://www.dol.gov/esa/regs/compliance/ofccp/faqs/jvafaqs.htm> to assist them in these meetings.)
 - The new G-FIVE Initiative.
- ii. Area and District offices will meet and/or conduct a conference call with these agencies at least annually thereafter.
- iii. Regions will report all contacts, meetings, compliance assistance seminars, and noteworthy significant achievements by contractors or state/local employment service delivery system agencies in their Weekly Reports using the following format:

Good-Faith Initiative for Veterans Employment (G-FIVE)
Activity Report

SAMPLE

Date	Contractor, State or Local Employment Agency	Location (City & State)	G-FIVE Activity	G-FIVE Significant Achievements (Example - increase in VEVRAA workforce, programs that enhance VEVRAA compliance, best practices, newsworthy stories)
01/01/08	State Job Service Center employees	Seattle, WA	Held Compliance Assistance Workshop on the requirements of 41 CFR Part 60-250 and 60-300 and information on the G-FIVE Initiative	
04/02/08	XYZ Company	Las Vegas, NV		Developed a training program with local employment service agency resulting in a 10% increase in its veteran workforce.

5. **EVALUATION FACTORS:** The following factors will be considered when evaluating federal contractor and subcontractor establishments for G-FIVE recognition:

- i. Evidence of covered veterans in the contractor's labor force.
- ii. Evidence of an increase in the number of covered veterans in the contractor's labor force.
- iii. The number of partnerships with local veterans' service organizations to employ or advance covered veterans.
- iv. Established liaison with the state workforce agency job bank or the local employment service delivery system representative to facilitate the posting of their job listings. Whether appropriate job openings were sent to the state and/or local employment service delivery system and the number of veterans hired by the contractor during the AAP year.
- v. Recruitment efforts at educational institutions to reach students who are covered veterans.
- vi. The number of job advertisements in the local community targeting veterans; and targeted recruitment of qualified covered veterans during company career days and/or related activities in contractor communities.
- vii. For prime contractors, evidence that demonstrates a commitment to encourage their subcontractors to seek qualified covered veterans for employment opportunities.
- viii. Affirmative action steps taken to attract qualified special disabled or disabled veterans through the nearest Veterans Administration job placement program.
- ix. The number of on-the-job training opportunities provided to covered veterans.

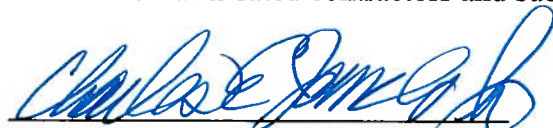
6. **HOW TO SUBMIT RECOMMENDATIONS FOR G-FIVE RATINGS:**

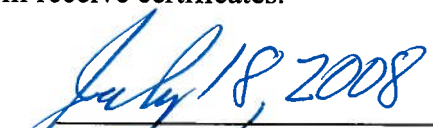
- i. Based on the outcome of a full compliance review, i.e., desk audit, onsite, and offsite, each Fiscal Year the Regional Director will make G-FIVE recommendations to the National Office of contractors and subcontractors that have demonstrated outstanding achievements in the employment of covered veterans, based on the above evaluation factors.
- ii. Contractors and subcontractors also may self-nominate by submitting to the appropriate Regional Director a written statement of their interest in being considered for G-FIVE recognition. A full compliance review will be conducted if the nominated establishment has not undergone a full compliance review within 24 months of the nomination.

7. **EVALUATION PROCEDURES:** The following are the guidelines for evaluating potential G-FIVE contractors and subcontractors:
- i. The contractor or subcontractor is not required to undertake all the activities listed in the above evaluation factors to be considered a G-FIVE contractor or subcontractor.
 - ii. The federal contractor or subcontractor establishment shall be vetted to ensure that it does not have an employment discrimination charge that was found to be meritorious and/or a pending or settled systemic discrimination finding. Clearances will also be sought from appropriate Department of Labor agencies.
 - iii. A committee comprised of both National and Regional OFCCP representatives will evaluate the submissions and develop a list to be submitted to the OFCCP Deputy Assistant Secretary (DAS) for approval.
 - iv. Upon approval by the OFCCP DAS, contractors or subcontractors that receive a G-FIVE rating will be notified by letter of their selection and recognized on the OFCCP web site in a "best practices" section.

8. **HOW CONTRACTORS RECEIVING A G-FIVE RATING WILL BE RECOGNIZED:**

- i. Moratorium on compliance evaluations - Contractor or subcontractor establishments that receive a G-FIVE rating will be excluded from an OFCCP compliance evaluation for three (3) years following the date the recipient receives the rating, unless:
 - A complaint suggests equal employment opportunity issues that warrant a compliance evaluation;
 - An EEOC or state fair employment practices agency investigation reveals significant equal employment opportunity issues; or
 - The DAS, acting upon a credible report of a violation of a law enforced by OFCCP, determines that a compliance evaluation is warranted.
- ii. Contractors and subcontractors receiving G-FIVE ratings also will be recognized on OFCCP's webpage.
- iii. G-FIVE rated contractors and subcontractors will receive certificates.


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