

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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Name: Anonymous

Comment: Employee and applicant protected veteran status information needs to be continued to be collected by Federal Contractors in order to complete the required benchmark reporting. Collecting, maintaining, and analyzing this data on an annual basis also helps a company determine if discrimination may or may not be occurring. The burden to collect and maintain this data is minimal, it is merely a checkbox in their existing systems with occasional paperwork when a survey is completed. The requirement that federal contractors utilize an ESDS to distribute available jobs can cause a financial burden. 3rd party ESDS software companies often charge ridiculous amounts of money because they know their services are mandatory and that contractors feel pressure to use them. We rarely see results from this mandatory requirement, the most successful veteran placements come from veteran focused employment sites, not state job boards. It is a lot of money and effort for a process that rarely results in a new hire. In summary: We support the continued mandatory collection of employee and applicant veteran status information. We support continuing the requirement for written Affirmative Action Plans. We are in favor of removing the mandatory use an ESDS to ease the financial burden on federal contractors.