

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: I strongly support renewal of the VEVRAA recordkeeping and reporting requirements. These data collections are necessary and have clear practical utility. They are the primary mechanism that allows OFCCP to identify systemic underutilization of protected veterans and to evaluate whether federal contractors are meeting their statutory obligation to employ and advance veterans—not merely avoid discrimination. Without these data, patterns of veteran concentration in entry-level and labor classifications and underrepresentation in skilled and leadership roles would remain largely invisible. The estimated reporting burden is reasonable and proportionate given the scope of federal contracting and can be integrated into existing HR and compliance systems. Any administrative cost is outweighed by the public interest value of transparency and accountability in the use of public funds. To enhance utility while minimizing burden, OFCCP should continue expanding standardized electronic submission, HRIS integration, and clearer guidance that distinguishes hiring, promotion, and advancement outcomes. Allowing this collection to lapse would materially weaken enforcement of one of the only federal protections ensuring real employment opportunity for veterans. I urge approval of this renewal.