

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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Comment: BufferSprings submits this comment in strong support of OFCCP's request to renew the VEVRAA information collection request (OMB Control No. 1250-0004). BufferSprings is a Service-Disabled Veteran-Owned Small Business with more than ten years of direct experience working inside federal contractor compliance, recruiting, and workforce systems. We work with both employers subject to VEVRAA and veterans navigating those systems. The observations summarized here reflect long-term, first-hand experience across hundreds of contractor establishments. VEVRAA is one of the only enforceable employment protections veterans have. While it has been law for decades, it has not been treated as a priority in practice. For years, VEVRAA was overshadowed by Executive Order 11246, and contractors focused compliance resources where enforcement pressure was strongest. Veterans were deprioritized as a result. Although EO 11246 has since been rescinded, the enforcement culture that neglected veteran outcomes has not corrected itself. The information collection covered by this request is not administrative overhead. It is the infrastructure that makes enforcement possible. Without applicant flow data, hiring outcomes, outreach evaluations, benchmark analysis, and related records, VEVRAA cannot be enforced in any meaningful way. OFCCP's supporting statement correctly notes that less frequent collection would compromise enforcement. We agree. Decades of reporting show that most federal contractors are not meeting the national veteran hiring benchmark. This is not a marginal gap. In many organizations, veteran representation remains flat or declines year over year despite continuous reporting. This pattern has persisted across administrations, economic cycles, and regulatory updates. The problem is not paperwork. It is lack of accountability. A central failure in VEVRAA implementation is that required data is collected but rarely used to drive change. Mandatory VETS-4212 filings are commonly treated as an annual paper exercise. Reports are prepared, submitted, and archived with minimal internal review. In many organizations, the data is not reviewed by talent leadership or senior management and does not inform recruiting strategy, advancement, or retention. In some cases, VETS-4212 data reveals persistent occupational segregation, with veterans disproportionately concentrated in entry-level and blue-collar roles while being underrepresented in professional, technical, and leadership positions. These patterns are visible year over year, yet they frequently trigger no internal review, no corrective action, and no accountability. When filings do not prompt scrutiny, they reinforce the perception that veteran

outcomes are monitored but not enforced. Benchmarks that do not trigger diagnosis become meaningless. Reporting without consequence encourages performative compliance. When contractors miss the hiring benchmark for multiple plan years, the data should prompt barrier analysis and corrective action. These expectations do not require new regulations. They require consistent use of information contractors are already required to collect. BufferSprings supports minimizing unnecessary burden through modernization and clarity, not by weakening oversight. Burden is reduced when contractors build systems that work. Allowing accountability to erode will not. Renewing this information collection preserves OFCCP's ability to enforce VEVRAA as a real protection rather than a symbolic one. Veterans do not need promises. They need enforceable protections and employers who are held accountable. Please see the attached document for our full comments.

Comment includes Attachment.