



BUFFERSPRINGS
EMPOWERING COMPANIES. ELEVATING VETERANS

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January 13, 2026

Ashley Romanias

Director

Office of Federal Contract Compliance Programs

U.S. Department of Labor

200 Constitution Avenue NW

Washington, DC 20210

Re: Proposed Renewal of Information Collection Request

Recordkeeping Requirements Under the Vietnam Era Veterans' Readjustment Assistance Act

Docket OFCCP-2025-0100

OMB Control No. 1250-0004

Director Romanias,

BufferSprings is a Service-Disabled Veteran-Owned Small Business that has worked in federal contractor compliance, recruiting, and workforce systems for more than ten years. Over that time, I have reviewed, advised on, and helped build veteran hiring and compliance systems across hundreds of federal contractor establishments spanning multiple industries and contract sizes. We also work directly with veterans navigating these systems. What follows is grounded in long-term, first-hand experience.

We submit this comment in strong support of OFCCP's request to renew the VEVRAA information collection request. This renewal is essential to preserving one of the only enforceable employment protections veterans have.

VEVRAA HAS BEEN LAW FOR DECADES BUT HAS NOT BEEN TREATED AS A PRIORITY

For decades, VEVRAA existed alongside Executive Order 11246. In practice, veteran protections were routinely overshadowed by race and gender compliance priorities. Contractors allocated time, resources, and leadership attention where enforcement pressure was strongest. Veteran



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hiring and advancement were treated as secondary. This was not accidental. It reflected enforcement reality.

Executive Order 11246 has since been rescinded. VEVRAA remains the law. Yet the enforcement culture that deprioritized veterans has not meaningfully corrected itself. Many contractors continue to neglect veteran recruitment, advancement, and retention because they have not been held accountable for outcomes.

The recordkeeping requirements covered by this information collection are not administrative formalities. They are the infrastructure that makes enforcement possible.

OFCCP requested public comment on four specific areas. BufferSprings addresses each directly.

1. PRACTICAL UTILITY: THIS INFORMATION COLLECTION IS NECESSARY TO ENFORCE VEVRAA

The information collected under this request is necessary for OFCCP to perform its statutory enforcement role. Without applicant flow data, hiring outcomes, outreach evaluations, benchmark analysis, and related records, there is no meaningful way to assess compliance.

Veterans encounter predictable and repeatable barriers in federal contractor hiring systems. These include resume screening bias against military experience, failure to recognize military licenses and credentials, rigid job qualifications that exclude qualified veterans, inaccessible application platforms, and weak advancement pathways. These barriers do not surface through intent statements or outreach narratives. They surface through data.

OFCCP's supporting statement correctly acknowledges that less frequent collection would compromise enforcement. We agree. If this information collection expires or is weakened, VEVRAA becomes symbolic rather than enforceable.

2. BURDEN ESTIMATES: CHRONIC BENCHMARK FAILURE REFLECTS LACK OF ACCOUNTABILITY

OFCCP estimates an average burden of approximately 48 hours per contractor establishment per year, with a total annual burden of 4,334,822 hours across covered establishments.

After more than twenty years working inside contractor systems, I can state clearly that burden is not the reason veteran hiring outcomes remain poor. The reason is the absence of sustained accountability.



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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.

When a statutory benchmark exists for decades and the regulated population consistently fails to meet it, the problem is not paperwork. It is enforcement.

Contractors that invest in functional applicant tracking systems, consistent self-identification processes, and outcome-based outreach reviews are able to comply without disruption. Contractors that do not build those systems experience compliance as reactive and burdensome. Weak systems persist because accountability has been inconsistent.

3. QUALITY AND UTILITY: DATA IS COLLECTED BUT RARELY USED TO DRIVE CHANGE

A central failure in VEVRAA implementation is not lack of data. It is lack of required action.

Mandatory VETS-4212 filings are commonly treated as an annual paper exercise. The report is prepared, submitted, and archived. Internal review is minimal. Meaningful change rarely follows.

In many organizations, VETS-4212 data is not reviewed by talent leadership, business units, or senior management. It is not used to evaluate recruitment strategy, promotion practices, retention patterns, or career progression. It exists primarily to satisfy a filing requirement.

In some cases, VETS-4212 data reveals clear and persistent patterns of occupational segregation. Veterans are disproportionately concentrated in entry-level and blue-collar roles while being underrepresented in professional, technical, and leadership positions. These patterns persist year over year. They are visible in the data, yet they frequently trigger no internal review, no corrective action, and no accountability.

Whether these outcomes are driven by bias, structural screening practices, or lack of advancement pathways, the result is the same. Skilled and experienced veterans are funneled into narrow job categories while leadership and high-skill opportunities remain out of reach.

When VETS-4212 filings do not trigger internal review or external scrutiny, they reinforce the perception that veteran employment outcomes are monitored but not enforced. Data that is collected but not examined does not protect anyone.



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4. CLARITY AND ENFORCEMENT: BENCHMARKS MUST TRIGGER DIAGNOSIS

Benchmarks that do not trigger follow-up become meaningless. Reporting without consequence encourages performative compliance.

When contractors miss the hiring benchmark for consecutive plan years, a documented barrier analysis should be expected. Outreach reviews should evaluate conversion and hiring outcomes, not participation alone. Persistently low self-identification rates should prompt evaluation of whether veterans trust the process or fear negative impact.

These expectations do not require new regulations. They require consistent use of data contractors are already required to collect.

Effective use of this information collection would mean that veteran hiring data is routinely reviewed by leadership, benchmark shortfalls prompt documented diagnosis, and persistent disparities result in corrective action.

5. MINIMIZING BURDEN THROUGH SYSTEM QUALITY, NOT REDUCED OVERSIGHT

BufferSprings supports minimizing unnecessary burden through modernization and clarity, not by weakening oversight. OFCCP's supporting statement correctly notes that these requirements do not impose a significant economic impact on small businesses and that most contractors already maintain records electronically.

Burden is reduced when contractors build systems that work. Burden increases when oversight is weak and compliance becomes reactive.

Standardized templates, clear data definitions aligned with modern ATS platforms, and plain-language guidance will reduce wasted effort. Allowing accountability to erode will not.

ENFORCEMENT ACCOUNTABILITY IS THE CORE ISSUE

VEVRAA has suffered from decades of inconsistent enforcement. Veterans have felt the impact in hiring, advancement, and retention outcomes. Contractors have adapted their behavior accordingly.



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This information collection is one of the few remaining levers OFCCP has to ensure veteran protections are more than statements of intent. Allowing it to lapse or weaken would further entrench the perception that veteran employment outcomes are optional.

CONCLUSION

BufferSprings strongly supports renewing the VEVRAA information collection request under OMB Control No. 1250-0004.

Veterans do not need symbolic support. They need enforceable protections, employers who are held accountable, and systems that are required to produce results. Approval of this information collection preserves OFCCP's ability to enforce a law that has too often been allowed to exist without consequence.

Respectfully submitted,

Rob Arndt
Chief Executive Officer
BufferSprings
Proud U.S. Marine Veteran