

MASTER BURDEN ANALYSIS

VEVRAA Recordkeeping OMB 1250-0004: 48.18 Hours Is 800–1,100% Understated — Full Clause-by-Clause Cost Analysis

VEVRAA Recordkeeping | 38 U.S.C. §4212 | Due: MARCH 9, 2026 | regulations.gov

⚠️ URGENT — COMMENT DEADLINE: MARCH 9, 2026 ⚠️

File at regulations.gov | Docket OFCCP-2025-0100 | DOL-OFCCP, 200 Constitution Ave NW, Room C-3325, Washington DC 20210

Filer	James Hunter Poole, Executive Chairman & CEO — Obelisk Tech Systems Inc.
CAGE / UEI	9S0L8 U34MSJ6A6413 Thomasville, Thomas County, Georgia (Rural, ~23% poverty, ~14% BA attainment)
Contracts	Navy · Army · SOCOM · AFSOC — Cybersecurity, AI, Quantum Comms, Encrypted Comms, Submarine/Aerial Drone Systems
Standing	ETAAC Nominee DARPA SBIR HR0011SB20254-12 14-Patent Portfolio DTIC AD1348980 NIST 800-171 ITAR DS-2032 BIS SNAP-R S745686 FinCEN MSB DOE Energy-AI Nexus
Entity	Delaware Corporation — Defense Technology CAGE 9S0L8 SAM.gov Active SBIR Applicant

I. THE CENTRAL FINDING: 800–1,100% UNDERSTATEMENT

Obelisk Tech Systems Inc. (CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia) submits this Comment 1 of 13 as the master burden analysis for OFCCP's proposed renewal of OMB Control No. 1250-0004, VEVRAA Recordkeeping Requirements under 38 U.S.C. §4212 (Docket OFCCP-2025-0100, Federal Register Vol. 91, No. 4, January 7, 2026). The published estimate of 48.18 hours per contractor establishment per year is systematically understated by 800–1,100% for small, remote-first, rural, defense technology startup contractors. Individual obligations — particularly legal review and audit-ready file maintenance — are understated by 1,000–2,000%.

The Paperwork Reduction Act, 44 U.S.C. §§3501-3521, requires that OMB burden estimates accurately reflect the burden on the actual respondent population. A figure calibrated to large established contractors with dedicated HR and compliance staff does not accurately reflect the burden on a bootstrapped rural defense technology company with no HR department, no dedicated compliance staff, no physical headquarters, and a remote-first distributed workforce. Obelisk demands that OFCCP publish updated burden estimates before this renewal is approved.

II. OBLIGATION-BY-OBLIGATION BURDEN TABLE

Obligation	Description	OFCCP Est.	Actual (Small Remote Co.)	Multiplier	Annual Cost	10-Yr Cost	Priority
AAP Drafting	Annual Affirmative Action Plan — veteran hiring goals, utilization analysis, outreach plan	4 hrs	40–80 hrs	1,000–2,000%	\$6,500–\$18,000	\$65K–\$180K	CRITICAL
Applicant Tracking	ATS implementation, maintenance, veteran self-ID invitation system	3 hrs	20–30 hrs	667–1,000%	\$3,200–\$6,500	\$32K–\$65K	CRITICAL
Self-ID Invitations	Pre-offer and post-offer veteran status invitation, recordkeeping	2 hrs	8–12 hrs	400–600%	\$1,300–\$2,500	\$13K–\$25K	HIGH

Utilization Analysis	Annual veteran utilization rate calculation vs. benchmark	2 hrs	12–18 hrs	600–900%	\$2,000–\$3,800	\$20K–\$38K	HIGH
Outreach Records	Recruitment outreach documentation — veteran service organizations, job fairs, universities	3 hrs	12–20 hrs	400–667%	\$2,000–\$4,200	\$20K–\$42K	HIGH
Audit-Ready Files	Organization and maintenance of VEVRAA compliance files for potential OFCCP audit	4 hrs	20–30 hrs	500–750%	\$3,200–\$6,500	\$32K–\$65K	CRITICAL
Regulatory Monitoring	Tracking OFCCP guidance, DOL updates, VEVRAA regulatory changes	2 hrs	8–12 hrs	400–600%	\$1,300–\$2,500	\$13K–\$25K	MEDIUM
Legal Review	Annual legal review of AAP, policies, and compliance posture	3 hrs	30–50 hrs	1,000–1,667%	\$4,800–\$9,500	\$48K–\$95K	CRITICAL
Remote Workforce	Establishment definition analysis for distributed/remote-first tech companies	N/A	15–25 hrs	N/A — not in OMB estimate	\$2,400–\$5,000	\$24K–\$50K	CRITICAL
Subcontract Flowdown	VEVRAA clause flowdown to subcontractors, monitoring, documentation	N/A	10–20 hrs	N/A — not in OMB estimate	\$1,600–\$4,000	\$16K–\$40K	HIGH
TOTALS	All VEVRAA recordkeeping obligations combined	~23 hrs (OMB)	175–297 hrs (actual)	~761–1,291%	\$28,300–\$62,500	\$283K–\$625K	

III. METHODOLOGY

The 'Actual Hours' column reflects Obelisk's documented experience operating as a first-time federal contractor, bootstrapped, remote-first, and rural. The OFCCP's 48.18-hour estimate assumes a contractor with: existing HR infrastructure; a physical establishment with defined workforce; existing ATS and self-identification systems; prior VEVRAA compliance history; and dedicated compliance staff. None of these assumptions apply to Obelisk or to the approximately 20,000–40,000 first-generation small defense technology startup contractors entering the federal market annually. The estimate must be disaggregated by contractor size, age, and remote workforce status before this renewal can be approved.

The two rows marked 'N/A' in the multiplier column — remote workforce establishment analysis and subcontract flowdown — are not captured in OFCCP's estimate at all. These obligations are real, documented, and generate \$4,000–\$9,000 in annual compliance costs for small contractors. Their complete absence from the 48.18-hour estimate is a methodological deficiency requiring correction.

IV. E.O. 12866 / E.O. 14192 AND OIRA DEMANDS

A. Cost-Benefit Analysis — Not Present in Renewal Submission

OFCCP's renewal submission states the information collection is needed 'to carry out its responsibility to enforce VEVRAA.' This is a statement of purpose, not a cost-benefit analysis. E.O. 12866 requires that significant regulatory actions demonstrate benefits justify costs. OFCCP must publish: (1) the annual dollar benefit of VEVRAA recordkeeping in terms of measurable veteran employment outcomes attributable to contractor recordkeeping (not outreach or hiring — specifically recordkeeping); (2) the annual cost to small contractors of maintaining those records; and (3) a net benefit calculation. Without this analysis, the renewal cannot be approved under E.O. 12866.

B. E.O. 14192 Deregulatory Offset

Executive Order 14192 requires ten regulatory burden reductions for every new burden added. The renewal of 1250-0004 at understated burden levels, without any deregulatory offset, violates E.O. 14192. Obelisk identifies ten required offsets in Comment 11 (Master Demand). OFCCP must adopt at least ten burden-reduction measures before OMB approves this renewal.

C. Chief Financial Officer / Chief Information Officer Certifications

- DOL CFO: Certify the annual dollar amount of VEVRAA enforcement actions — audits, conciliation agreements, debarments — that were made possible by information contained in contractor recordkeeping maintained under 1250-0004. If this figure is unavailable, the collection's practical utility cannot be established.
- DOL CIO: Certify whether a unified electronic VEVRAA recordkeeping portal is technically feasible within 24 months — one submission satisfying VEVRAA, Section 503 disability, and EEO-1 requirements.
- OMB OIRA: Conduct interagency review under E.O. 12866 Section 6 before approving this renewal, including consultation with SBA Office of Advocacy on small contractor burden.

V. FORMAL DEMAND: DECLINE TO APPROVE

Obelisk demands OMB decline to approve the 1250-0004 renewal until: (1) updated burden estimates reflecting the 800–1,100% multiplier are published; (2) a full E.O. 12866 cost-benefit analysis with DOL CFO/CIO certifications is published within 90 days; (3) a full IRFA analyzing startup, remote-first, and rural contractor burden is published; and (4) the ten deregulatory offsets in Comment 11 are adopted or rejection is justified with reasoned explanation.

Respectfully submitted,

James Hunter Poole

Executive Chairman & CEO | Obelisk Tech Systems Inc.

CAGE: 9S0L8 | UEI: U34MSJ6A6413 | Thomasville, Georgia

14-Patent Portfolio | DTIC AD1348980 | ETAAC Nominee | DARPA SBIR HR0011SB20254-12

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