

UNIFIED ELECTRONIC PORTAL

One Submission Must Satisfy VEVRAA + Section 503 + EEO-1 — DOL CIO Certification Required Before Renewal Approved

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 THREE-PORTAL COMPLIANCE NIGHTMARE

A federal contractor subject to VEVRAA (\$200,000+ contract) is typically also subject to Section 503 of the Rehabilitation Act (disability affirmative action) and EEO-1 reporting obligations. Each program has different recordkeeping requirements, different submission portals, different data definitions, different annual deadlines, and different agency administrators. OFCCP administers VEVRAA and Section 503; EEOC administers EEO-1. There is no coordination between them. A small contractor must build and maintain three separate compliance programs, three separate data collection systems, and three separate reporting tracks — for what is essentially the same underlying workforce data.

The combined annual burden for a small remote-first contractor subject to all three programs: VEVRAA recordkeeping (175–297 actual hours, per Comment 1); Section 503 recordkeeping (estimated 150–280 actual hours using the same multiplier applied to OMB's 46-hour Section 503 estimate); EEO-1 reporting (estimated 20–40 hours for a small company with complex classification requirements). Total: 345–617 hours per year — for a company with no HR staff.

II. SPECIFIC PORTAL DEMANDS

A. Single Federal Contractor Workforce Compliance Portal

- Create a single governmentwide portal accepting one annual submission that satisfies VEVRAA recordkeeping (OMB 1250-0004), Section 503 recordkeeping (OMB 1250-0005), and EEO-1 reporting (OMB 3046-0007).
- Portal must: pre-populate contractor data from SAM.gov (CAGE code, contract values, employee count); accept standard workforce data in common formats (CSV, HRIS exports); generate agency-specific reports from a single data upload; provide real-time confirmation and compliance status dashboard.
- DOL CIO must certify within 90 days whether this portal is technically feasible within 24 months. If yes, OFCCP must initiate a joint rulemaking with EEOC. If no, DOL CIO must explain the specific technical barrier.

B. AI-Assisted Compliance Authorization

- Authorize use of AI-assisted tools for VEVRAA compliance documentation: AI-generated AAP drafts reviewed and certified by the contractor are accepted as meeting all VEVRAA recordkeeping requirements.

- AI-assisted applicant tracking analysis — generating utilization reports and benchmark comparisons — accepted when the contractor certifies the input data and methodology.
- This single change would reduce VEVRAA compliance burden by an estimated 40–60% for small contractors without any reduction in data quality. DOL CIO must certify within 90 days whether AI-assisted submissions are compatible with OFCCP compliance systems.

C. Template-Based AAP Safe Harbor

- OFCCP must publish and maintain a standard AAP template — updated annually to reflect current benchmarks and regulatory requirements — that, when used by a contractor without modification, constitutes presumptive VEVRAA compliance without requiring legal review.
- Template acceptance is the single most effective burden-reduction measure OFCCP can implement. It eliminates the 30–50 hours of legal review that dominates small contractor VEVRAA burden.

III. DOL CIO CERTIFICATION DEMAND

Before OMB approves the 1250-0004 renewal, the DOL Chief Information Officer must certify: (1) whether a unified VEVRAA/Section 503/EEO-1 portal is technically feasible; (2) what the estimated cost of building such a portal is; and (3) whether the 10-year compliance cost savings to contractors (\$283K–\$625K per contractor × 89,978 establishments = \$25B–\$56B in total 10-year contractor compliance costs) exceed the portal development cost. If the answer to (3) is yes, the portal must be built before the next renewal cycle.

Respectfully submitted,

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