

PRACTICAL UTILITY CHALLENGE

OFCCP Has Not Demonstrated That VEVRAA Recordkeeping (As Currently Structured) Produces Measurable Veteran Employment Outcomes

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 PRA PRACTICAL UTILITY REQUIREMENT

The Paperwork Reduction Act, 44 U.S.C. §3506(c)(3)(A), requires OMB to ensure that each information collection has 'practical utility' — defined as actual usefulness in agency operations, not merely theoretical utility. OFCCP's renewal submission does not demonstrate practical utility. It states the collection 'is needed to carry out its responsibility to enforce VEVRAA' — which is a statement of purpose, not a demonstration of utility. For a collection generating 4,334,822 annual burden hours across 89,978 contractor establishments, OFCCP must demonstrate that those hours produce outcomes, not just compliance.

II. WHAT OFCCP MUST DEMONSTRATE

A. Enforcement Outcomes From Recordkeeping

OFCCP must publish data showing: (1) how many VEVRAA compliance evaluations in the last 5 fiscal years involved review of records maintained under 1250-0004; (2) how many of those evaluations resulted in findings of non-compliance; (3) how many findings were based on recordkeeping deficiencies vs. actual hiring discrimination; (4) how many conciliation agreements or debarments resulted; and (5) how many additional veteran hires resulted from those enforcement actions.

If the answer to (5) is negligible — if VEVRAA recordkeeping enforcement produces minimal additional veteran employment — then 4,334,822 annual burden hours and \$356,313 in operating costs (plus the contractor-side costs of \$28,300–\$62,500 per establishment per year, totaling \$2.5B–\$5.6B annually for the full contractor base) cannot be justified under any rational cost-benefit framework.

B. The Obelisk Cost-Benefit Calculation

For Obelisk specifically: annual VEVRAA compliance cost of \$28,300–\$62,500 on a \$1.5M SBIR Phase II award = 1.9%–4.2% of contract value spent on recordkeeping that may never be reviewed by OFCCP and that produces no direct veteran employment benefit for a 3-person startup that does not yet hire at scale. This compliance cost diverts resources from R&D, from hiring additional engineers, and from patent portfolio development. The opportunity cost is real and concrete.

III. DEMANDED DATA PUBLICATION

- OFCCP to publish, as part of the 1250-0004 renewal record, the enforcement outcome data described above — specifically quantifying how many additional veteran hires resulted from VEVRAA recordkeeping enforcement in the last 5 years.
- OFCCP to commission and publish a cost-benefit analysis of 1250-0004 before OMB approves the renewal — specifically calculating the per-veteran-hire cost of the recordkeeping program (total annual contractor compliance cost divided by additional veteran hires attributable to enforcement).
- If the per-veteran-hire cost exceeds \$50,000, OFCCP must explain why the recordkeeping program is the most cost-effective approach to achieving VEVRAA's objective of veteran employment, compared to alternatives such as direct hiring incentives (WOTC expansion), procurement preferences for veteran-hiring contractors, or streamlined compliance with lower burden.

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
Filed at regulations.gov | Docket OFCCP-2025-0100 | OMB Control No. 1250-0004 | March 2026