

PUBLIC POLICY RESILIENCE INSTITUTE (PPRI)

Nonpartisan policy research and implementation accountability

Public Comment (Paperwork Reduction Act)

Department of Labor - Office of Federal Contract Compliance Programs (OFCCP)

Agency Information Collection Activities; Submission for OMB Review; Comment Request

Title of Collection: Complaint Involving Employment Discrimination by a Federal Contractor or Subcontractor

OMB Control No.: 1250-0002 FR Doc.: 2025-24174

Acronyms

- DOL - Department of Labor
- OFCCP - Office of Federal Contract Compliance Programs
- ICR - Information Collection Request
- OMB - Office of Management and Budget
- PRA - Paperwork Reduction Act
- LEP - Limited English Proficiency

Cover Sheet

Position: Support with conditions (usability, accessibility, and burden realism)

PPRI supports reauthorization of OFCCP's complaint intake collection where it improves practical access to the complaint process and enables timely, accurate triage. To avoid burden shifting to filers, the final package should strengthen plain-language routing guidance, validate burden estimates with user testing, and ensure accessible, mobile-friendly submission pathways.

Public-information assurance

PPRI's comments rely solely on publicly available information and the notice text. PPRI does not use or rely on nonpublic information.

Perspective: PPRI is a nonpartisan public-interest organization focused on program reform and policy implementation.

Summary of conditions for support

1. Jurisdiction and routing clarity (reduce misfiled submissions; explain when the pre-complaint inquiry is appropriate and when the complaint form is required).

2. Burden estimate realism (validate time and effort assumptions with representative users, including mobile-only and disability accommodation needs).
3. Accessibility and language access (ensure screen-reader compatibility, clear accommodation pathways, and meaningful assistance for LEP filers).
4. Data minimization and privacy clarity (request only what is necessary at intake and explain, in plain language, how information is used, stored, and protected).
5. Confirmation, tracking, and authorized-representative support (provide reliable submission receipts and support for caregivers/representatives where permitted).

Comment

1. Practical utility - keep the intake process understandable and usable

The collection is necessary to support OFCCP's jurisdictional intake, triage, and investigation functions. Practical utility increases when the collection helps filers quickly determine (a) whether OFCCP is the right forum and (b) what minimum information is needed for initial review. PPRI recommends prominent, plain-language routing guidance and clear statements about what happens after submission (acknowledgment, triage, referrals, and expected timelines).¹

2. Burden estimate - validate assumptions under real filing conditions

The notice estimates 1,718 annual respondents and 505 annual burden hours (plus other cost burden).¹ To ensure these estimates reflect typical completion conditions, PPRI recommends usability and burden testing across varied users (mobile-only, limited digital literacy, disability accommodations, and LEP). Testing should include common real-world steps such as identifying the employer/contract, assembling dates, preparing a narrative, and submitting supporting documents.

3. Quality, utility, and clarity - reduce preventable errors and missed deadlines

PPRI recommends: (a) a one-page "when to use" guide distinguishing the pre-complaint inquiry from the complaint form; (b) clear statements on whether an inquiry preserves or does not preserve any filing time limits; and (c) short examples of common scenarios and the appropriate next step.

4. Minimize burden through digital design and accessibility

Where electronic submission is offered, burden can be reduced with mobile-friendly design, save-and-return functionality, input validation, and auto-population of repeated fields. Accessibility should include screen-reader compatibility, keyboard navigation, high-contrast support, and a clearly posted accommodation/assistance pathway. Language-access supports can further reduce incomplete submissions and back-and-forth.

5. Data stewardship and public trust

To maintain public trust, the collection should emphasize data minimization and provide plain-language privacy information describing how the submission will be used, stored, shared, and retained. Where additional documentation is optional at intake, the instructions should clearly distinguish what is required versus helpful.

Conclusion

PPRI supports the ICR reauthorization and recommends OMB/DOL finalize the collection with the conditions above to ensure the complaint intake process is accessible, understandable, and aligned with realistic filer burden. These targeted improvements preserve program integrity while minimizing preventable delays and burden shifting to the public.

Respectfully submitted,

Public Policy Resilience Institute (PPRI)

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Footnotes (PPRI public comment style)

1. Department of Labor, Agency Information Collection Activities; Submission for OMB Review; Comment Request; Complaint Involving Employment Discrimination by a Federal Contractor or Subcontractor, 91 Fed. Reg. 168 (Jan. 2, 2026) (notice) (FR Doc. 2025-24174).