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OFCCP Is Still Alive: Complaint Form Revisions, VEVRAA Recordkeeping Renewal, and FY2026 Funding

Government Contractor Compliance & Regulatory Update on **February 9, 2026**

Reports of OFCCP demise may have been premature, as 2026 has begun with some notable developments for the agency which suggests OFCCP is looking to be active in its reduced role and will have the funds to do so.

1) Complaint and Pre-Complaint Forms: Revisions to Align with E.O. 14173

On January 2, 2026, the Department of Labor submitted an OFCCP-sponsored Information Collection Request ("ICR") to the Office of Management and Budget ("OMB") to revise the agency's complaint (CC-4) and pre-complaint inquiry (CC-390) forms to conform with E.O. 14173. The notice reiterates that complainants may file with OFCCP under Section 503 and VEVRAA, but not under E.O. 11246.

2) VEVRAA Recordkeeping: Renewal Request and Continued Obligations

On January 7, 2026, OFCCP submitted a renewed ICR in an effort to extend its existing recordkeeping requirements under VEVRAA to continue "carry[ing] out its responsibility to enforce VEVRAA." This renewal is a reminder that contractors (with contracts of $200,000 or more) must maintain VEVRAA-compliant systems, including affirmative action programs, equal opportunity clauses in contracts, mandatory job postings, applicant self-identification for protected veterans (pre- and post-offer), and an annual hiring benchmark.

3) FY 2026 Appropriations: Funding and Legislative Status

On February 3, 2026, President Trump signed H.R. 7148, the "Consolidated Appropriations Act, 2026," into law. As a result, OFCCP has been appropriated $100,976,000 in funding for FY2026. While OFCCP's FY2026 funding is about 10% less than that from FY2025, this move signals a commitment to enforcing OFCCP's priorities.

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