

January 19, 2023

**Electronic Submission via Regulations.gov**

<https://www.regulations.gov/commenton/OFCCP-2022-0004-0001>

Tina T. Williams  
Director, Division of Policy and Programs Development  
U.S. Department of Labor  
Office of Federal Contract Compliance Programs  
200 Constitution Avenue NW  
Room C-3325  
Washington, D.C. 20210

**Re: Comment on OFCCP's Proposed Approval of Information Collection Requirements  
OMB No. 1250-0003**

Dear Ms. Williams:

Our organization is writing to oppose the OFCCP's proposed changes to the Scheduling Letter and Itemized Listing.

The information and data required for submission for an OFCCP compliance review would be expanded greatly if these changes are adopted. Despite this significant expansion, the OFCCP estimates that the time to respond would increase by only 11 hours. We believe this underestimates the amount of time that would be required to pull together this information.

In addition, the OFCCP has not proposed to provide contractors additional time to respond to the new Scheduling Letter & Itemized Listing; with the extraordinary increase in information sought, a 30-day response time is not feasible.

The OFCCP's proposed changes would be extremely burdensome for contractors, and the OFCCP should consider the real and practical effects of the changes. To that end, we request that the OFCCP withdraw the proposed changes.

Sincerely,

Chicago Metro Industry Liaison Group Executive Board

Angela Adams, Chair  
Sheryl von Westernhagen, Vice Chair  
Mary Ann Rivers, Secretary  
Rosa Hartman, Treasurer