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**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 that would be required to be submitted during an OFCCP compliance review would be expanded exponentially if these changes are adopted. Despite this significant expansion, the OFCCP estimates that the time to respond would increase by only 11 hours. As an initial matter, the OFCCP has already grossly underestimated the amount of time to respond to the current Scheduling Letter & Itemized Listing. This mistake is compounded by the OFCCP's failure to adequately estimate the additional amount of time and the administrative burden that these revisions would place on contractors.

The OFCCP's proposed changes would be extremely burdensome for contractors and the OFCCP should consider the real and practical effects of the changes on contractors in formulating a more realistic burden estimate. Unless and until that is done, we request that the OFCCP withdraw the proposed changes.

Sincerely,

Beth Ronnenburg  
Baltimore ILG Chair