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Volume 34 | Issue 70 | August 25, 2011

DOL Extends Deadline for VETS-100/VETS-100A Filing

The DOL has extended the filing deadline for the 2011 VETS-100/VETS-100A reports for 60 days, or until November 30, 2011.

Background

The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, requires certain federal contractors and their subcontractors (contractors) to file VETS-100/VETS-100A reports with the U.S. Department of Labor (DOL) by September 30 of each year following a calendar year in which the contractor held a government contract or subcontract. The reports detail the number of qualified covered veterans in the contractors' workforces, by job category and hiring location, as well as the number of new hires during the 12-month reporting period who are qualified covered veterans.

Which report to file depends on when the contract that triggers the reporting requirement was entered into or modified. Contractors with a current government contract or subcontract in the amount of \$25,000 or more that was entered into prior to December 1, 2003 must file the VETS-100 report, while contractors with a government contract or subcontract in the amount of \$100,000 or more that was entered into or modified on or after December 1, 2003 must file the VETS-100A report. Contractors must file both the VETS-100 and VETS-100A reports if they have covered contracts or subcontracts entered into before December 1, 2003 and also have covered contracts or subcontracts entered into or modified on or after December 1, 2003.

The Filing Deadline

The DOL had planned to begin accepting electronic submissions of VETS 100/VETS-100A reports on August 1, 2011. Due to technical problems, the DOL now expects that the electronic filing system will not be online until October 1, 2011. In light of the delay, the DOL [announced](#) that it is extending the September 30 deadline to file for the 2011 cycle for 60 days, and will not initiate enforcement actions against contractors who submit their VETS-100/VETS-100A reports between October 1, 2011 and November 30, 2011.

BUCK COMMENT. *The deadline for federal contractors and subcontractors that are subject to the EEO-1 filing requirements to submit a 2011 EEO-1 report that summarizes their workforce demographics is not affected by the extended deadline for the VETS-100/VETS-100A reports. Thus, they must still file EEO-1 reports on or before September 30, 2011.*

Conclusion

Unless the DOL further extends the VETS-100/VETS-100A filing deadline, federal contractors and subcontractors subject to the filing requirement will have to submit the appropriate form(s) by November 30, 2011. Contractors should periodically check the DOL website for updates on the status of the electronic filing system and ensure that they will be prepared to timely file all required reports when it goes online.

Buck's consultants would be pleased to assist in your compliance efforts.

This FYI is intended to provide general information. It does not offer legal advice or purport to treat all the issues surrounding any one topic.