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Volume 34 | Issue 77 | October 7, 2011

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

Due to continuing technical problems, the DOL has again extended the filing deadline for the 2011 VETS-100/VETS-100A reports. Federal contractors and subcontractors subject to the filing requirement will have an additional 30 days, or until December 30, 2011 to submit their reporting forms.

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). The reports, which normally must be filed by September 30, detail the number of qualified covered veterans currently employed as well as the number of new hires who are qualified covered veterans.

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 with covered contracts or subcontracts entered into before December 1, 2003 as well as covered contracts or subcontracts entered into or modified on or after that date must file both reports.

The Filing Deadline

In anticipation of a September 30 filing deadline, the DOL had planned to begin accepting electronic submissions of federal contractors' VETS 100/VETS-100A reports on August 1, 2011. When it became clear that the electronic filing system would not be online before October 1, 2011, the DOL extended the filing deadline for the 2011 cycle from September 30, 2011 to November 30, 2011. (See our August 25, 2011 [For Your Information](#).)

Due to continuing technical problems, the electronic filing system is not yet available to contractors. The DOL is currently working on the problems and expects the system to go online November 1, 2011. In view of the delay, the DOL has [announced](#) a further 30-day extension of the deadline to file for the 2011 cycle, and confirmed that it will not initiate enforcement actions against contractors who submit their VETS-100/VETS-100A reports from November 1, 2011 through December 30, 2011.

Conclusion

Barring further delay, federal contractors and subcontractors subject to the filing requirement will have to submit the appropriate form(s) by December 30, 2011. If, however, the DOL continues to encounter technical problems that prevent electronic submissions, it may have to further extend the VETS-100/VETS-100A filing deadline. Contractors should periodically check the DOL website for status updates and ensure that they will be prepared to timely file all required reports when the electronic filing system 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.