

Office of Federal Contract Compliance Programs (OFCCP) Answers Questions Surrounding Compliance with “Subpart C” of the new Veterans and Disability Regulations

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In a public webinar and new FAQs released today, OFCCP answered questions around timing of compliance with obligations set forth in Subpart C of the Agency’s new [Veterans](#) and [Disability](#) regulations. OFCCP sought to clarify and clear up what has been [widespread confusion](#) about the timing of required compliance with the data collection aspects of these new regulations.

In part, Subpart C of the regulations require:

- Pre-offer self – identification for protected veterans and individuals with disabilities
- Annual disability utilization review
- Annual veteran benchmark assessment

In the call today, OFCCP clarified, we think correctly, that the regulations do not require compliance with Subpart C until the date of an employer’s next regular annual affirmative action plan update following March 24, 2014 – the effective date of the new regulations.

While OFCCP confirmed the regulations do not require compliance before this time, the Agency recommended employers begin compliance earlier, or “as soon as practical.”

Based on the answers and information provided today by OFCCP, it is now up to employers to assess their readiness for compliance and determine when they will begin implementation of the components of “Subpart C” – March 24, 2014 or the date of the company’s next regular AAP or somewhere in between.

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