

Federal Contractor Section 503 and VEVRAA Compliance Solution

Office of Federal Contract Compliance Programs (OFCCP) enforcement is meant to ensure affirmative action and equal opportunity employment for job seekers and wage earners.

The federal government spends more than \$500 billion dollars a year on goods and services. Companies doing business with the federal government are required to comply with OFCCP regulations, including the recently amended Section 503 of the Rehabilitation Act (Section 503) and Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA). In addition, entities dealing with federal contractors or subcontractors may also have to abide by these regulations.

The OFCCP began enforcement of extensive amended regulations on Affirmative Action Plans (AAP) and recordkeeping requirements for both protected veterans (VEVRAA) and persons with disabilities (Section 503). These regulations require significant modification to your AAP, including new requirements for data collection, outreach, and training, "benchmarks" and goals. While some of these obligations can be delayed until your 2015 "transition" AAP, others should already be implemented.

Our Federal Contractor Section 503 and VEVRAA Compliance Solution

In response to the OFCCP's ongoing efforts to drive federal contractor compliance with the amended regulations, Foley is providing a solution to ensure compliance with these new requirements. This solution includes options that allow you to customize the package of components that best suits your company.

KEY COMPONENTS

- » **Required Documents for Compliance.** Our Federal Contractor Section 503 and VEVRAA Compliance Toolkit is a standalone resource created for HR departments and AAP compliance teams for guidance on updating your AAP and meeting the new compliance standards on your own, without attorney assistance. The Toolkit includes notices to recruiters, subcontractors, and union partners; disclosures and tag lines for applications and job announcements; clauses for contracts and subcontracts; recordkeeping logs and management tools; self-identification forms and surveys; and analysis/evaluation tools.
- » **Training on the New Regulations.** Our AAP attorneys and paralegals can also provide one-on-one or group training for your HR department and contract professionals on the amended regulations, required AAP changes, benchmark hiring and recruiting information and techniques, data collection (including self-identification) and recordkeeping changes, budgeting, and timelines for implementation and compliance.

This training is set up as a half-day session, but we can remain available for the remainder of the day for question and answer discussions as well. As part of the training, you will receive all forms and evaluation tools from the Federal Contractor Section 503 and VEVRAA Compliance Toolkit.
- » **AAP Preparation.** Foley also has its own AAP creation software that we use to meet the requirements of the current and amended regulations. Plan preparation pricing depends on the number of sites involved and the number of employees at each site. We prepare the AAP and train your EEO coordinator separately regarding ongoing compliance and



provide assistance with training on AAP preparation software, should you decide to update your own plans going forward.

- » **OFCCP Audit Defense and Counseling.** Should your company need it, our AAP Compliance attorneys are skilled and experienced in defending clients in OFCCP desk and on-site audits, as well as litigation under the Affirmative Action rules and regulations. We review and work with you or your AAP vendor to update your AAP and the materials necessary to meet the submission requirements of a desk audit, and assist you in preparing for additional information requests that may determine whether the OFCCP converts your audit to an on-site audit.

With an on-site audit, we provide training and education to persons likely to be interviewed by the OFCCP, review your facility for compliance concerns, and prepare your EEO coordinator and HR management team to be able to respond to questions and produce information most often requested during the on-site audit. We also can assist with preparation and conduct the analysis necessary to address an OFCCP compensation review and challenges to your hiring and promotion practices.

For More Information

For more information on our Federal Contractor Section 503 and VEVRAA Compliance Solution, or to receive pricing information, please contact:

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