



**DirectEmployers  
Association**

# Housekeeping Tips

- If you have Zoom issues, please email [kacie@directemployers.org](mailto:kacie@directemployers.org).
- Questions can be asked using the Q&A panel and will be read aloud at the end of the session.
- Today's webinar is being recorded and will be sent via email within a few days.
- This session has also been submitted for HRCI and SHRM credits. Please email [kacie@directemployers.org](mailto:kacie@directemployers.org) to obtain credit information.
- Don't forget to complete the post-event survey at the end of the webinar!
- Want more compliance updates? Sign up for text alerts by texting compliance to 55678.

**Last but not least...**

**Use #DEchat to tweet during the event!**



**DirectEmployers  
Association**

# Career Website OFCCP Compliance

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# Legal Disclaimer

This presentation is meant to assist in a general understanding of affirmative action regulations.

It is not to be considered legal or professional advice.

Companies or individuals with particular questions should seek advice of counsel.



# Agenda



- I. Overview
- II. Required Notices
- III. Accommodations
- IV. Policy Statement & AAP Availability
- V. Tagline
- VI. Outreach & Positive Recruitment for Individuals with Disabilities

# Overview: Statutes Enforced by OFCCP








**Executive Order 11246**, as amended, prohibits discrimination based on **race, color, religion, sex, gender identity, sexual orientation** or **national origin** and requires affirmative action.



**Section 503** of the Rehabilitation Act of 1973, as amended, prohibits discrimination based on disability and requires affirmative action in the employment of qualified **individuals with disabilities**.



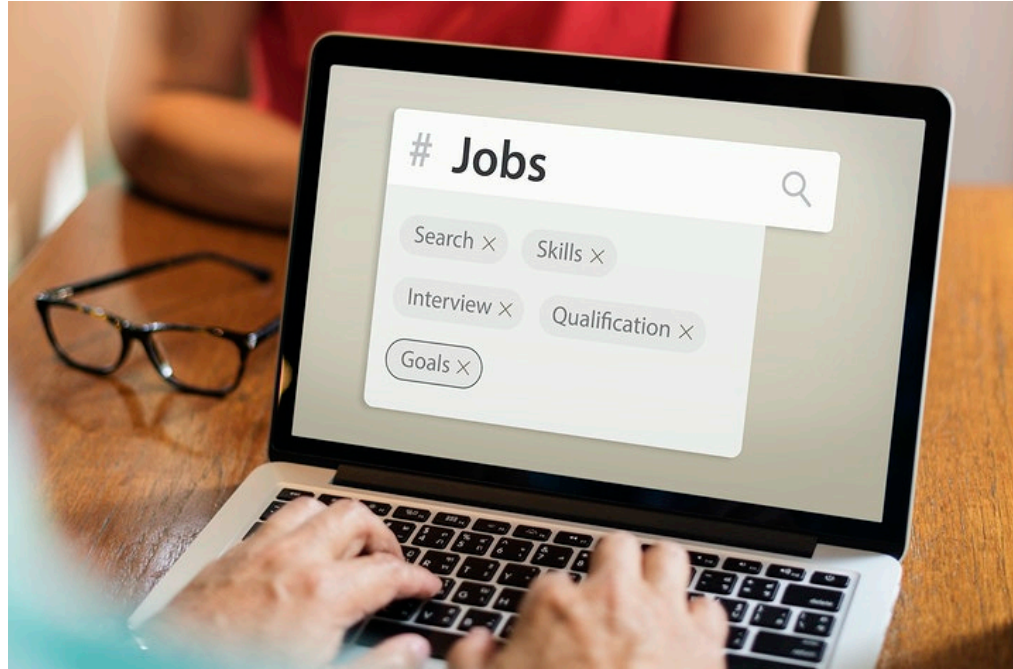
**VEVRAA** - The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, prohibits discrimination against specified categories of veterans protected by the Act and requires affirmative action in the employment of such **protected veterans**.

Graphic	Represents / Abbreviations
	<b>Executive Order 11246, as amended</b> <ul style="list-style-type: none"> <li>• "EO 11246"</li> <li>• "Women &amp; Minorities"</li> </ul>
	<b>Section 503 of the Rehabilitation Act of 1973, as amended</b> <ul style="list-style-type: none"> <li>• "Section 503"</li> <li>• Individuals with disabilities or IWD</li> </ul>
	<b>Vietnam Era Veterans' Readjustment Assistance Act of 1974</b> <ul style="list-style-type: none"> <li>• "VEVRAA"</li> <li>• Protected Veterans</li> </ul>
	<b>Regulation from Title 41 of the Code of Federal Regulations</b> <ul style="list-style-type: none"> <li>• "CFR 41" / § = Section</li> <li>• Chapter 60 = Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor</li> </ul>
	<b>Tip or Best Practice</b>

Then...



Now...



Your career website is your virtual Human Resource Office!!

# Agenda

I. Overview

II. Required Notices



III. Accommodations

IV. Policy Statement & AAP Availability

V. Tagline

VI. Outreach & Positive Recruitment for Individuals with Disabilities

# Required Notifications



- Equal opportunity clause

“...An **electronic posting must be used** by the contractor to notify job applicants of their rights **if the contractor utilizes an electronic application process.**”

Notice	Last Revision	Notes
1) EEO is the Law	November 2009	<ul style="list-style-type: none"><li>• Applicable to non-federal contractors as well, outlines the regulations EEOC enforces.</li></ul>



REF: 41 CFR §60-1.4 (a)(1) Equal opportunity clause.

REF: 41 CFR §60-1.42 Notices to be posted.

REF: 41 CFR §60-300.5 (a)(9) Equal Opportunity Clause.

REF: 41 CFR §60-741.5 (a)(4) Equal Opportunity Clause.

REF: Title VII of the Civil Rights Act of 1964 SEC. 2000e-10 [Section 711] Posting of Notices.



# 1) EEO is the Law Notice

## Equal Employment Opportunity is

# THE LAW

### Private Employers, State and Local Governments, Educational Institutions, Employment Agencies and Labor Organizations

Applicants to and employees of most private employers, state and local governments, educational institutions, employment agencies and labor organizations are protected under Federal law from discrimination on the following bases:

#### RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN

Title VII of the Civil Rights Act of 1964, as amended, protects applicants and employees from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment, on the basis of race, color, religion, sex (including pregnancy), or national origin. Religious discrimination includes failing to reasonably accommodate an employee's religious practices where the accommodation does not impose undue hardship.

#### DISABILITY

Title I and Title V of the Americans with Disabilities Act of 1990, as amended, protect qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship.

#### AGE

The Age Discrimination in Employment Act of 1967, as amended, protects applicants and employees 40 years of age or older from discrimination based on age in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment.

#### SEX (WAGES)

In addition to sex discrimination prohibited by Title VII of the Civil Rights Act, as amended, the Equal Pay Act of 1963, as amended, prohibits sex discrimination in the payment of wages to women and men performing substantially equal work, in jobs that require equal skill, effort, and responsibility, under similar working conditions, in the same establishment.

#### GENETICS

Title II of the Genetic Information Nondiscrimination Act of 2008 protects applicants and employees from discrimination based on genetic information in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. GINA also restricts employers' acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

#### RETALIATION

All of these Federal laws prohibit covered entities from retaliating against a person who files a charge of discrimination, participates in a discrimination proceeding, or otherwise opposes an unlawful employment practice.

#### WHAT TO DO IF YOU BELIEVE DISCRIMINATION HAS OCCURRED

There are strict time limits for filing charges of employment discrimination. To preserve the ability of EEOC to act on your behalf and to protect your right to file a private lawsuit, should you ultimately need to, you should contact EEOC promptly when discrimination is suspected.

The U.S. Equal Employment Opportunity Commission (EEOC), 1-800-669-4000 (toll-free) or 1-800-669-6820 (toll-free TTY number for individuals with hearing impairments). EEOC field office information is available at [www.eeoc.gov](http://www.eeoc.gov) or in most telephone directories in the U.S. Government or Federal Government section. Additional information about EEOC, including information about charge filing, is available at [www.eeoc.gov](http://www.eeoc.gov).

Education Amendments of 1972 prohibits employment discrimination on the basis of sex in educational programs or activities which receive Federal financial assistance.

EEOC 9/02 and OFCCP 8/08 Versions Usable With 11/09 Supplement

### Employers Holding Federal Contracts or Subcontracts

Applicants to and employees of companies with a Federal government contract or subcontract are protected under Federal law from discrimination on the following bases:

#### R, RELIGION, SEX, NATIONAL ORIGIN

Under 11246, as amended, prohibits job discrimination on the basis of race, religion, sex or national origin, and requires affirmative action to ensure equal opportunity in all aspects of employment.

#### INDIVIDUALS WITH DISABILITIES

The Rehabilitation Act of 1973, as amended, protects qualified individuals from discrimination on the basis of disability in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment. Disability discrimination includes not making reasonable accommodation to the known physical or mental limitations of an individual with a disability who is an applicant or employee, barring undue hardship. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

#### RECENTLY SEPARATED, OTHER PROTECTED, AND FORCES SERVICE MEDAL VETERANS

The Uniformed Services of America Veterans Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits job discrimination and requires affirmative action to employ and advance in employment disabled veterans, recently separated veterans (within

three years of discharge or release from active duty), other protected veterans (veterans who served during a war or in a campaign or expedition for which a campaign badge has been authorized), and Armed Forces service medal veterans (veterans who, while on active duty, participated in a U.S. military operation for which an Armed Forces service medal was awarded).

#### RETALIATION

Retaliation is prohibited against a person who files a complaint of discrimination, participates in an OFCCP proceeding, or otherwise opposes discrimination under these Federal laws.

Any person who believes a contractor has violated its nondiscrimination or affirmative action obligations under the authorities above should contact the OFCCP immediately.

The Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor, 200 Constitution Avenue, N.W., Washington, D.C. 20210, 1-800-397-6251 (toll-free) or (202) 693-1337 (TTY). OFCCP may also be contacted by e-mail at [OFCCP-Public@dol.gov](mailto:OFCCP-Public@dol.gov), or by calling an OFCCP regional or district office, listed in most telephone directories under U.S. Government, Department of Labor.

### Programs or Activities Receiving Federal Financial Assistance

#### R, NATIONAL ORIGIN, SEX

Under the provisions of Title VII of the Civil Rights Act of 1964, as amended, and Title VI of the Civil Rights Act of 1964, as amended, prohibits discrimination on the basis of race, color or national origin in programs or activities receiving Federal financial assistance. Employment discrimination is prohibited in Title VI if the primary objective of the financial assistance is employment, or where employment discrimination causes or may cause a barrier to participation in providing services under such programs. Title IX of the Education Amendments of 1972 prohibits employment discrimination on the basis of sex in educational programs or activities which receive Federal financial assistance.

#### INDIVIDUALS WITH DISABILITIES

Section 504 of the Rehabilitation Act of 1973, as amended, prohibits employment discrimination on the basis of disability in any program or activity which receives Federal financial assistance. Discrimination is prohibited in all aspects of employment against persons with disabilities who, with or without reasonable accommodation, can perform the essential functions of the job.

If you believe you have been discriminated against in a program of any institution which receives Federal financial assistance, you should immediately contact the Federal agency providing such assistance.

EEOC-P/E-1 (Revised 11/09)



# Required Notifications



Notice	Last Revision	Notes
2) EEO is the Law - Supplement	September 2015	<ul style="list-style-type: none"><li>• Adds “gender identity” and “sexual orientation” to protected classes for Federal Contractors.</li><li>• Adds “Pay Secrecy” for Federal Contractors.</li></ul>

## 2) EEO is the Law - Supplement

### **“EEO is the Law” Poster Supplement**

#### **Employers Holding Federal Contracts or Subcontracts Section Revisions**

*The Executive Order 11246 section is revised as follows.*

#### **RACE, COLOR, RELIGION, SEX, SEXUAL ORIENTATION, GENDER IDENTITY, NATIONAL ORIGIN**

Executive Order 11246, as amended, prohibits employment discrimination based on race, color, religion, sex, sexual orientation, gender identity, or national origin, and requires affirmative action to ensure equality of opportunity in all aspects of employment.

#### **PAY SECRECY**

Executive Order 11246, as amended, protects applicants and employees from discrimination based on inquiring about, disclosing, or discussing their compensation or the compensation of other applicants or employees.

*Individuals with Disabilities section is revised as follows:*

#### **INDIVIDUALS WITH DISABILITIES**

Section 503 of the Rehabilitation Act of 1973, as amended, protects qualified individuals with disabilities from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, or other aspects of employment. Disability discrimination includes not making reasonable accommodation for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or employee, barring undue hardship to the employer. Section 503 also requires that Federal contractors take affirmative action to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level.

*Vietnam Era, Special Disabled Veterans section is revised as follows:*

#### **SELECTED VETERANS**

The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, prohibits employment discrimination against, and requires affirmative action to recruit, employ, and advance in employment, disabled veterans, recently separated veterans (i.e., within three years of discharge or release from active duty), active duty wartime or campaign badge veterans, or Armed Forces service medal veterans.

*Mandatory Supplement to EEOC P/E-1 (Revised 11/09) “EEO is the Law” Poster.*

If you believe that you have experienced discrimination contact OFCCP: 1-800-397-6251 | TTY 1-877-889-5627 | [www.dol.gov](http://www.dol.gov)





The regulations require contractors to "**conspicuously store**" the "**EEO is the Law**" poster with, or as part of, an electronic application.

**Q: Does this mean that an actual physical or electronic copy of the poster must be individually stored with each application?**

# Answer

- **The purpose of this requirement is to ensure that applicants who apply for jobs electronically are informed of their equal employment opportunity protections as part of the application process.**
- Although including a copy of the poster with every electronic application will satisfy the requirement, **the regulations do not require contractors to do this.**
- Rather, a contractor may choose to satisfy this requirement in any way that ensures that every electronic applicant has the opportunity to view the poster during the application process, such as by **displaying a prominent link to the poster**, along with a brief explanation of what the link connects to, as part of their electronic application.



The regulations require that the "**EEO is the Law**" poster be made available in a "form that is accessible and understandable" to individuals with disabilities and disabled veterans, such as Braille or large print.

**Q. Must contractors maintain Braille and/or large print versions of the poster at all locations?**

# Answer

- Providing the "EEO is the Law" poster in an alternate format, such as large print or Braille, **is a form of reasonable accommodation**.
- Therefore, contractors must make the poster available in such an alternate format **only** when an applicant or employee requests the poster in an alternate format, or when the contractor knows that an applicant or employee is unable to read the poster because of a disability.
- Contractors **may also** provide the poster to an applicant or employee with a disability in other alternate formats, such as on disc or in an audio recording, so long as the format provided enables the individual with a disability to access the contents of the poster.

[https://www.dol.gov/ofcccp/regs/compliance/faqs/VEVRAA\\_faq.htm#Q23](https://www.dol.gov/ofcccp/regs/compliance/faqs/VEVRAA_faq.htm#Q23)



## §60-1.35 Contractor obligations and defenses to violation of the nondiscrimination requirement for compensation disclosures.

“(2) The nondiscrimination provision shall be disseminated to employees and **applicants**. Dissemination of the provision shall be executed by **electronic posting** or by posting a copy of the provision in **conspicuous places available to employees and applicants** for employment.”

Notice	Last Revision	Notes
3) Pay Transparency Provision	No date on poster, but last update: December 2016	<ul style="list-style-type: none"><li>Full description of the “Pay Secrecy” reference in the Supplement.</li></ul>

### 3) Pay Transparency

## **PAY TRANSPARENCY NONDISCRIMINATION PROVISION**

The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information. 41 CFR 60-1.35(c)

If you believe that you have experienced discrimination contact OFCCP  
1.800.397.6251 | TTY 1.877.889.5627 | [www.dol.gov/ofccp](http://www.dol.gov/ofccp)



## Required Notices – Best Practices



- ✓ Use the same link (**the main link**) for all three.
- ✓ This link will allow the user to select their preferred language.
- ✓ Also, if there are updates to the notices, you will not need to update a link to a new PDF.

## Office of Federal Contract Compliance Programs

SHARE   

[DOL Home](#) > [OFCCP](#) > [Compliance Assistance](#) > [Posters](#)

### [OFCCP Homepage](#)

#### [About OFCCP](#)

- [Compliance Assistance](#)
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- [About OFCCP](#)

#### [Contact Us](#)

#### [Subscribe to Email Updates](#)

[Español](#)

## Equal Employment Opportunity Posters

Every employer covered by the nondiscrimination and EEO laws is required to post on its premises the poster, "**Equal Employment Opportunity is the Law.**" The notice must be posted prominently, where it can be readily seen by employees and applicants for employment. The notice provides information concerning the laws and procedures for filing complaints of violations of the laws with the Office of Federal Contract Compliance Programs (OFCCP).

- EEO is the Law [English Version](#) – Revised November 2009
- EEO is the Law [Spanish Version](#) – Revised November 2009
- EEO is the Law [Chinese Version](#) – Revised November 2009
- EEO is the Law Supplement [English Version](#) – Revised September 2015
- EEO is the Law Supplement [Spanish Version](#) – Revised September 2015
- EEO is the Law Supplement [Chinese Version](#) – Revised September 2015

Link to the required [Pay Transparency Nondiscrimination Provision](#).

[Links to DOL Workplace Posters.](#)



# Samples

## Hawaiian Airlines is an Equal Opportunity Employer

Hawaiian Airlines ("Hawaiian") embraces the principles of Equal Employment Opportunity and Affirmative Action, and strives to recruit and retain the most talented applicants from a diverse candidate pool. We are committed to providing equal employment opportunities without regard to race, color, religion, sex, national origin, age, disability, veteran status, sexual orientation, gender identity or any other protected characteristic under applicable law. Our policies and procedures ensure that we deliver on that commitment with integrity, and that all employment decisions are based on merit and business need.

Read more about our commitment to these principles in the [Department of Labor's EEO notices](#), as well as our [EEO Policy](#) and [2019 EEO Statement](#).

Hawaiian Airlines is an E-Verify employer, as required by federal law. [See the E-verify notice](#). Learn about your right to work, in [English](#) or [Spanish](#).

Other applicable federal employment laws include [Family and Medical Leave Act \(FMLA\)](#), the [Employee Polygraph Protection Act \(EPPA\)](#), and [Uniform Services Employment and Reemployment Act \(USERRA\)](#).

### Accommodations for Applicants with Disabilities

Hawaiian has always worked to provide qualified applicants and employees who are disabled veterans or individuals with disabilities with needed reasonable accommodations in accordance with the ADA. If you have difficulty using our online system due to a disability and need an accommodation, please email us at [ApplicantAccommodation@HawaiianAir.com](mailto:ApplicantAccommodation@HawaiianAir.com) or call us at 808-835-3762.

<https://www.hawaiianairlines.com/careers>

# Sample

## Equal Opportunity Employer

Kronos is an Equal Opportunity Employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, gender identity, sexual orientation, age, national origin, protected veteran status, disability or any other basis protected by federal, state or local law.

View [The EEO is the Law poster](#) and [its supplement](#).

View the [Pay Transparency Nondiscrimination Provision](#)

Kronos participates in E-Verify. [View the E-Verify posters](#)



<https://www.kronos.com/about-us/careers>

# Agenda

I. Overview

II. Required Notices

**III. Accommodations**



IV. Policy Statement & AAP Availability

V. Tagline

VI. Outreach & Positive Recruitment for Individuals with Disabilities

# Required Notification of Accommodation



If you utilize an online application system, you **must**:

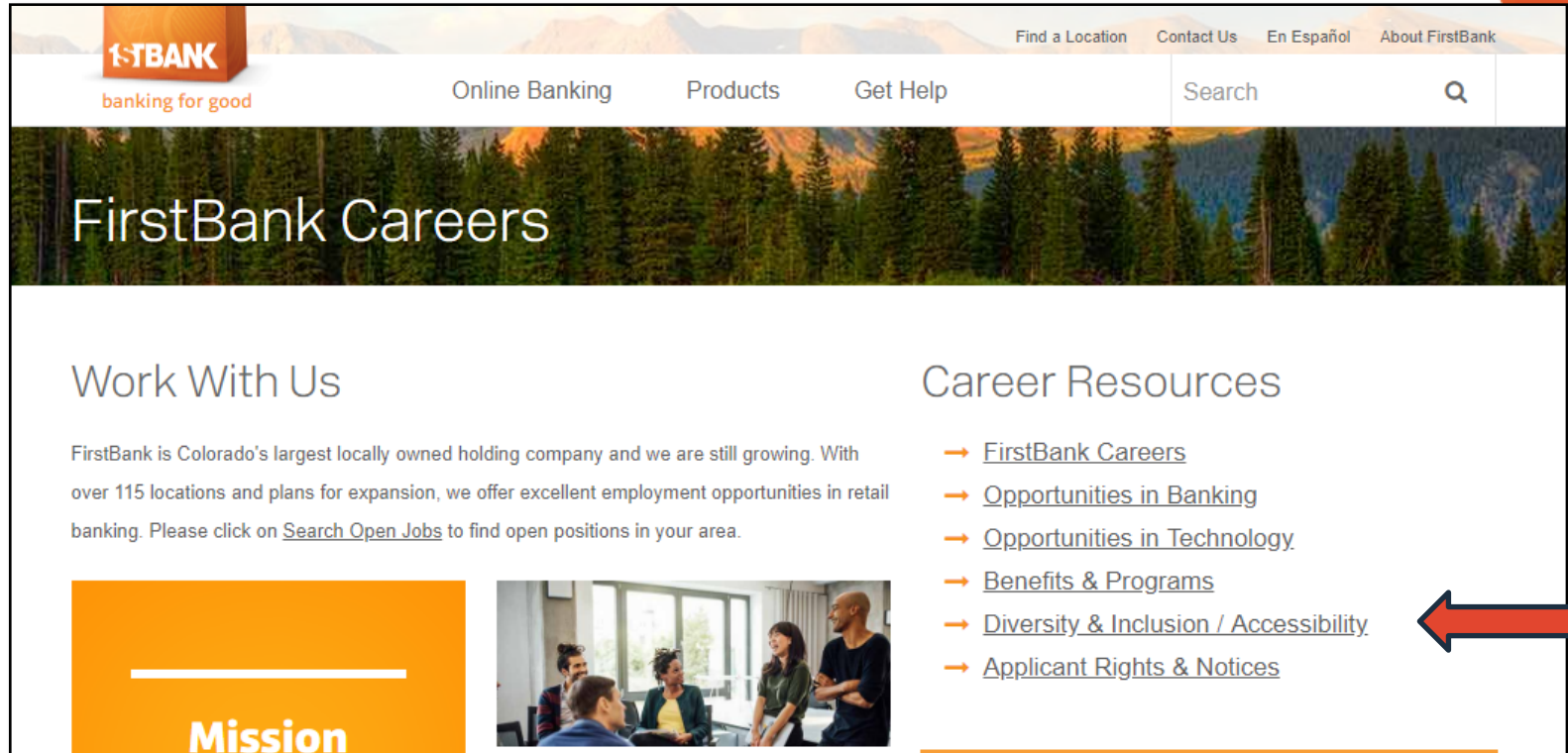
“...provide necessary **reasonable accommodation(s)**  
to ensure that an otherwise  
qualified individual with a disability who is not able to  
fully **utilize that system** is  
nonetheless provided with  
equal opportunity to apply and be considered for all  
jobs.”

REF: 41 CFR §60-741.21 (a) (6) (iii) Prohibitions.

REF: 41 CFR §60-300.21 (f) Prohibitions.

REF: Americans with Disabilities Act of 1990, as amended. Title 42 Chapter 126 – Subchapter I - Employment [Title 1] Sec 12112. Discrimination

# Sample



**1<sup>st</sup> “click” to Career Page:**

<https://www.efirstbank.com/about-firstbank/career-opportunities/career-search.htm>

# FirstBank Diversity & Inclusion / Accessibility

**2<sup>nd</sup> “click” to  
Accommodation  
Page**



## Disability Accommodation for Job Applicants

If you require a reasonable accommodation in order to perform the essential functions of the job or in order to complete an application for employment, you may be entitled to one under the ADAAA. Please call [1-303-235-1040](tel:1-303-235-1040) or send an email with your request to us at [EmploymentAccessibility@efirstbank.com](mailto:EmploymentAccessibility@efirstbank.com). Please specify the assistance needed by phone or in your email. We will reply to your request as soon as possible.

The email address and phone number listed above is reserved for individuals who require an accommodation due to a disability. Please do not utilize this email address or phone number to check on the status of your application or to inquire about a specific position if you do not also require an accommodation due a disability. Messages of this nature will not receive a response.

<https://www.efirstbank.com/about-firstbank/career-opportunities/diversity-and-accessibility.htm>



## Accessibility Note:

If you are a job seeker with a disability and require a reasonable accommodation to apply for one of our jobs, you will find the contact information to request the appropriate accommodation by visiting the following page:

[Accessibility Accommodation for Applicants](#)


[Dismiss Note](#)

banking for good 

[Find Opportunities](#)

[U.S. English](#) ▾

[Sign In](#)

 Search Results

 Tweet

## Teller

[Apply now](#)

 Banking  REPTE01793

Posted: July 15, 2019

Full-Time

Littleton, CO, USA

## Job Details

### Description

Responsible for accurately and efficiently processing a wide range of consumer and commercial bank transactions.



**Accommodation information on EVERY JOB DESCRIPTION!**



## How to enlarge website text

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Press Ctrl and "+" at the same time to zoom in. This enlarges all text and images on the page. Repeat the step to make text and images larger or press Ctrl "-" simultaneously to zoom out.

**1<sup>st</sup> "click" to Career Page**



## Disability Accommodations

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Public Consulting Group endeavors to make our Careers site accessible to any and all users. If you would like to contact us regarding the accessibility of our website or need assistance in completing the application process, please contact Shelly Falls at [sfalls@pcgus.com](mailto:sfalls@pcgus.com). This contact information is for accommodation requests only and cannot be used to inquire about the status of applications.



## Military Recruiting

John Deere supports hiring military veterans. If you would like to consider our Career Skills Program, head over to our [Military CSP page](#) for more information. If you have a military recruiting event that you would like us to consider attending, please email your request to [Military CSP](#).



## Disability Accessibility Accommodation

If you are a disabled veteran or a qualified individual with a disability that limits your use of this site as a result of your disability, you may request a reasonable accommodation from [Military CSP](#).



## Benefits at John Deere

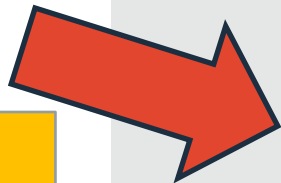
One of the most vital components of John Deere's total compensation is our benefits package.

[Click here for more information on the benefits offered at John Deere](#)

<https://www.deere.com/en/our-company/john-deere-careers/>



**Add the  
information to  
your website  
footer – then it is  
accessible from  
EVERY page!**





# Disability Issues Related to Online Application Systems Frequently Asked Questions

## For Employers

1. [May a contractor use only an online application system to accept applications for employment?](#)
2. [Does a contractor have to ensure that its online application system is accessible to individuals with disabilities?](#)
3. [May a contractor establish a separate application system for use solely by applicants with disabilities, while applicants without disabilities use the online application system?](#)
4. [If the contractor is using an online application system that already provides many accessibility features for individuals with disabilities, does the contractor also have to provide reasonable accommodations?](#)

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# Policy Statement



EEO Policy Statement needs to be visible to **applicants** and employees  
on

**“company bulletin boards.”**

## NOTE

- There are specific items that must be in the Policy Statement.
- Be sure your Policy Statement has all of the requirements.



# AAP Availability



The full affirmative action program,  
absent the data metrics required,  
**shall** be available to any employee or **applicant for  
employment**  
for inspection upon request.

The location and hours during which the program may be  
obtained

**shall** be **posted at each establishment.**



REF: 41 CFR §60-300.41 Availability of affirmative action programs.  
REF: 41 CFR §60-741.41 Availability of affirmative action programs.



# Sample

*...employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities:*

*(1) Filing a complaint;*

*(2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of VEVRAA/Section 503 or any other Federal, state or local law requiring equal opportunity for protected veterans;*

*(3) Opposing any act or practice made unlawful by VEVRAA/Section 503 or its implementing regulations in this part or any other Federal, state or local law requiring equal opportunity for protected veterans; or*

*(4) Exercising any other right protected by VEVRAA/Section 503 or its implementing regulations in this part.*


An Affirmative Action Officer has been assigned to direct the establishment and monitor personnel procedures to support our Affirmative Action Programs. The Officer is the Senior Vice President of Human Resources, Jane Doe.

The Affirmative Action Plans may be reviewed upon request to the Affirmative Action Officer during regular business hours (Mon-Fri 8:00AM – 5:00PM).




**Add the AAP availability information to your Policy Statement.**

# Sample

**1TBANK**  
banking for good

Find a LocationContact UsEn EspañolAbout Us

Online BankingProductsGet HelpSearch



# FirstBank Applicant Rights and Notices

## Applicant Rights and Notices

FirstBank Participates in E-Verify.

Federal immigration law requires all employers to verify both the identity and employment eligibility of all persons hired to work in the United States. In our efforts to meet the law's requirements, we participate in the E-Verify program established by the Department of Homeland Security and the Social Security Administration (SSA) to aid employers in verifying the employment eligibility of all newly-hired employees.

Click [here](#) for additional information on e-verify and other applicant rights, and [here](#) to view our EEO statement. California applicants, click [here](#).

## Career Resources

- [FirstBank Careers](#)
- [Opportunities in Banking](#)
- [Opportunities in Technology](#)
- [Benefits & Programs](#)
- [Diversity & Inclusion / Accessibility](#)
- [Applicant Rights & Notices](#)

## Reaffirmation of Affirmative Action Policy Statement

The Company reaffirms its belief and commitment in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

The Company has developed and maintained a written Affirmative Action Program (AAP). The company's Chief Executive Officer supports the affirmative action program and urges each employee to commit to carrying out the intent of this policy. The Company maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates. The EEO Administrator oversees the affirmative action plan development, modification, implementation, effectiveness, reporting requirements and conducts management updates. The Company invites every employee to review the Company's written Affirmative Action Plan. This plan is available for inspection upon request during normal business hours at the Human Resources office.


As part of the Company's commitment to this overall process, it will seek to ensure that all aspects of employment, including recruitment, selection, job assignment, training,

compensation, benefits, discipline, promotion, transfer, layoff and termination processes



<https://www.viacom.com/eeo-info-webpage>

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# EEO Tagline






“The contractor will, in **all solicitations or advertisements for employees** placed by or on behalf of the contractor, **state that** all qualified applicants will receive consideration for employment without regard to...”



REF: 41 CFR §60-1.41 Solicitations or advertisements for employees.  
REF: 41 CFR §60-300.5(a)(12) Equal opportunity clause.  
REF: 41 CFR §60-741.5 (a)(7) Equal opportunity clause.

# EEO Tagline

AAP	Protected Class
	<p><b>Race, Color, Religion, Sex, Sexual Orientation, Gender Identity, or National Origin</b></p> <p>➤ Can be abbreviated as “EOE”</p>
	<p><b>Disability</b></p> <p>➤ <u><b>CANNOT</b></u> be abbreviated</p>
	<p>Protected <b>Veteran</b> Status</p> <p>➤ Can be abbreviated as “vet”</p>

Jingle it!



### **LIST ALL PROTECTED CLASSES (AS APPLICABLE)**

“All qualified applicants will receive consideration for employment without regard to **race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status.**”



**List all nine and you are fine!**

### **OR, ABBREVIATE (AS APPLICABLE)**

“**EOE** including **disability/veteran**”

**Or go with three and be scot-free!**

# Sample

The University of Colorado Boulder is committed to building a culturally diverse community of faculty, staff, and students dedicated to contributing to an inclusive campus environment. We are an Equal Opportunity employer, including veterans and individuals with disabilities.

**Colorado Springs Utilities is an Equal Employment Opportunity/Affirmative Action employer.** Our differences make us richer. Learning and growing from one another makes us more than what we were. We want our workforce to be as diverse as our business and recognize the limitless benefits of this commitment. Our desire is to have the organization reflect the diversity of the Pikes Peak Region. As an Equal Employment Opportunity employer, it is our commitment that no person shall be unlawfully discriminated against because of race, color, national origin or ancestry, sex, age, religious convictions, veteran status, disability, political beliefs, sexual orientation or gender identity. Affirmative Action is Colorado Springs Utilities' effort to ensure positive steps are taken to have a representative workforce reflective of the relevant available labor force.

**Accessibility Accommodations** . If you are an individual with a disability or disabled veteran who is unable to use our online tools to search and apply for jobs, you may request a reasonable accommodation by contacting us at [accessibility@csu.org](mailto:accessibility@csu.org) or by calling 719-668-7500. This option is reserved for individuals who are unable to use or require assistance with the online tools as the result of a disability and is not intended for other purposes.



# Tips for Compliance

## 1) Required Notices



- ☐ EEO is the Law
- ☐ EEO is the Law Supplement
- ☐ Pay Transparency
- ☐ Do the links work?
- ☐ Are the links to the most updated information?

Link to the main OFCCP webpage.

# Tips for Compliance

## 2) Accommodations



- ☐ Do you have an accommodation statement on your website?
- ☐ Can you find the information in two clicks or less?

Have someone outside the company call or email for assistance – does someone respond? How quickly?

# Tips for Compliance

## **3) Policy Statement & AAP Availability**



- ☐ Is your EEO Policy Statement posted? If not on-line, at minimum somewhere in HR (or where applicants can see)?
- ☐ Does it include the proper points?
- ☐ Is your AAP availability information posted on-line? If not, at minimum somewhere in HR (or where applicants can see)?

Put your AAP availability information with your Policy Statement.

# Tips for Compliance

## 4) Tagline



- ☐ Do all of your job descriptions have a **proper** tagline?
- ☐ Is disability spelled out?
- ☐ Is veteran more than “v?”

Put the tagline at the TOP of the job description, so it doesn't get cut off when scraped and redistributed.

# DE Members – Federal Contractor Corner



Home Communities ▾ Directories ▾ Products/Apps ▾ Browse ▾ Participate ▾ Staff ▾ Help ▾

FEDERAL CONTRACTOR CORNER

- Discussion Posts
- Upcoming Events
- Library Resources
- Federal Contractor Corner**
- DE Updates
- DirectEmployers Blog ↗
- DirectEmployers Photos ↗

# DE Members – Federal Contractor Corner



## Compliance Tip Sheets

Items covered today:

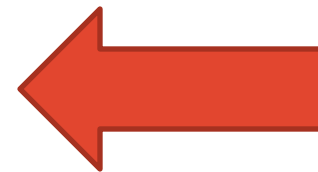
- Career Website
- Career Website Checklist
- EEO Tagline

And many more – including:

- Self-Identification Forms
- Evergreen Requisitions
- Disposition Codes

# Agenda

- I. Overview
- II. Required Notices
- III. Accommodations
- IV. Policy Statement & AAP Availability
- V. Tagline
- VI. Outreach & Positive Recruitment for Individuals with Disabilities**



# Outreach and Positive Recruitment



“The contractor shall undertake appropriate outreach and positive recruitment activities...reasonably designed to **effectively** recruit IWD & protected veterans...”





# Outreach and Positive Requirements



- Outreach is **more** than posting and listing jobs.
- What information can you provide to OFCCP as **documentation of relationships** you have built?
- What **events** can you share in which you have participated?



# Outreach and Positive Recruitment - Assessment



“The contractor shall, on an annual basis, **review** the outreach and recruitment efforts it has taken over the previous twelve months to **evaluate their effectiveness** in identifying and recruiting qualified protected veterans and individuals with disabilities...”



## Best Practices

### Creating an Inclusive Workforce

- **Centralized Accommodation System** – Centralized accommodation systems are a best practice in hiring and retaining employees with disabilities. With centralized accommodation systems, contractors can improve and streamline the accommodation process making it more efficient for employees with disabilities. A centralized accommodation system also helps ensure that contractors have sufficient expertise and funds in place to ensure accommodations requests are being appropriately reviewed and accommodations appropriately provided throughout the company. This is an efficient, high impact approach for contractors to better serve their employees.
- **Accessible Online Recruiting Tools** – In today's technology centric business environment, online application systems are commonplace. Contractors and individuals with disabilities lose when accessibility restraints exist. Contractors are encouraged to utilize all avenues, including those provided by U.S. DOL Office of Disability Employment Policy (ODEP), to make their systems accessible to individuals with disabilities.
- **CEO Leadership through Correspondence and Video** – Support from senior leadership is crucial for workforce programs to be effective. Contractors are encouraged to support their Disability Inclusion programs via various forms of media releases, both internally and externally.
- **Coordinate with State or local Vocational Rehabilitation Agencies** – Vocational Rehabilitation agencies are available to individuals with disabilities to help find and retain jobs. These organizations have relationships with individuals and their qualifications and are invaluable resource for matching an individual's skills with jobs.





## Analyze & Identify



## Create



## Implement & Measure

Analyze AAPs to understand what the data is telling you.

Identify where you need to focus your efforts.

Identify key players to help champion efforts.

Create a roadmap using DE partners, CONNET and DirectEmployers Products and Services

Include specific ideas and strategies.

Document these as your Action Oriented Programs



Document all outreach using the PRM, TJD, VetCentral DirectSource

Self Assessment – at least Quarterly (best practice)

Measure Effectiveness

To comply with the 503,  
you must do more than post jobs.

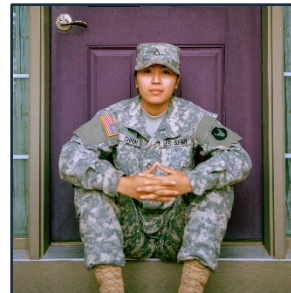


# Partnerships

Partnerships  
drive Outreach  
for VEVRAA  
(Disabled  
Veterans) and  
the 503



State &  
Federal



Military &  
Veteran



Early  
Talent



Individuals with  
Disabilities



LGBTQ



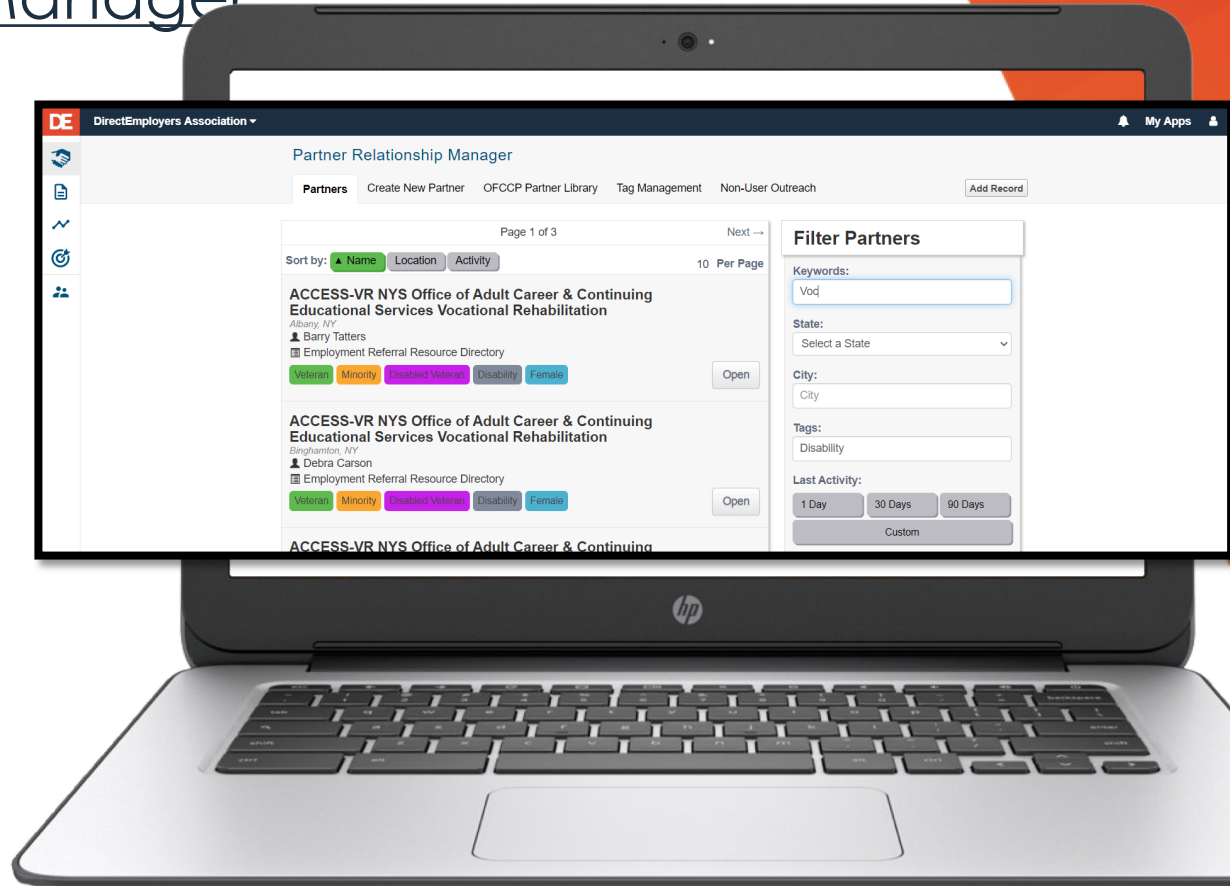
Women &  
Minority



# Partner Relationship Manager

- Track
- Document
- Report
- Tag
- Rate

...all of this with unlimited users and training for your entire team.



# Targeted Job Distribution

iation ▾

Targeted Job Distribution

Organizations

Add Organization

Organization(s)

+New Organization

Name ▾ ▲	
East Bay Innovations	View
LightHouse for the Blind and Visually Impaired	View
InAlliance	View
Best Buddies	View
Abilities United	View

Filter Organizations

Name:

Organization Name

Contact Category:

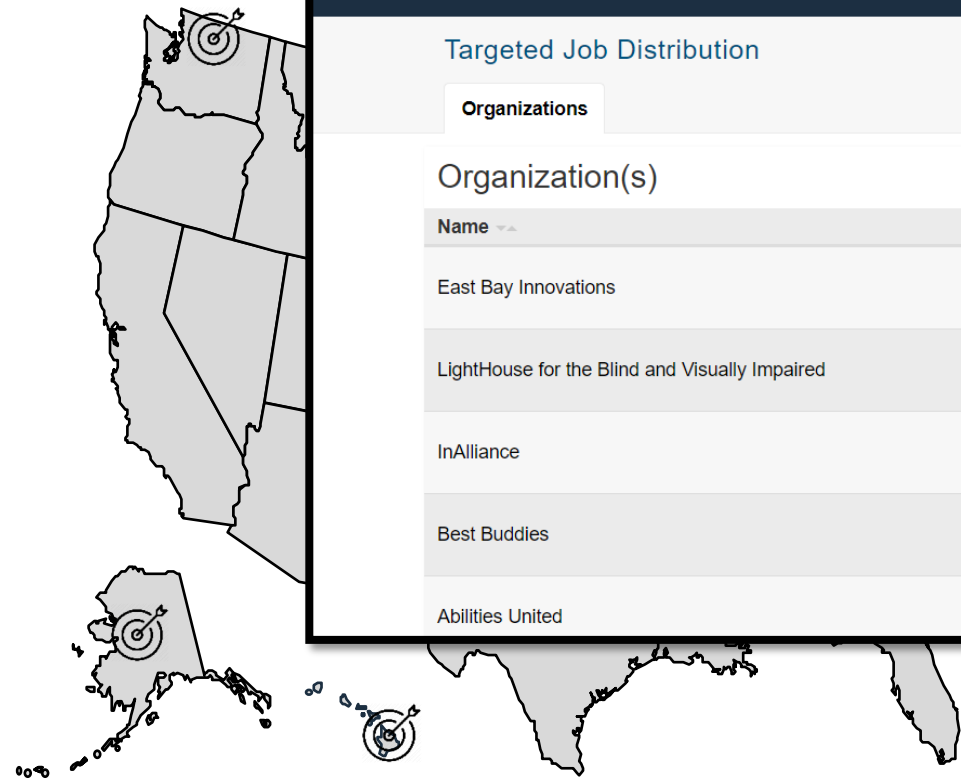
Disabled ▾

Distribution State:


California ▾

Distribution City:

Distribution City






by DirectEmployers

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PARTNER COMMUNITY [Settings](#)

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[Discussion 50](#)
[Library 25](#)
[DE Updates 0](#)
[Events 0](#)
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### Reach Out for Happy Hour: Wounded Warrior Project



**Jaime Costlow**

05-29-2020 10:58 AM

This event is the second in the Reach Out for Happy Hour series on Wednesday, May 27, 2020, at 4:00 pm and featured Michael Loubert and Kevin Rasch of [Wounded Warriors Project](#) and their employment program, [Warriors to Work](#). Wounded Warrior Project supports employers by connecting them with qualified veteran candidates, providing information about combat-related injuries (such as post-traumatic stress disorder and traumatic brain injury), and developing a long-lasting relationship throughout the life cycle of employment.

To view with closed captions, please visit <https://vimeo.com/423701947> and enter the password: [ReachOutWWP](#) to view the accessible recording.

[Actions](#)

- Statistics
- 0 Favorited
- 31 Views
- 2 Files
- 0 Shares
- 1 Downloads

204 results for "disability"

CATEGORIES

1 to 10 of 204

Sort by Relevance

[User Content \(203\)](#)
[Communities \(1\)](#)

REFINE BY

Community

- ☐ Member Exclusive Community (140)
- ☐ Staff Community (17)
- ☐ Partner Marketplace (11)
- ☐ Beta Testing Community (1)

Formal Tags

- ☐ webinars and presentations (90)
- ☐ disability (68)
- ☐ ofccp compliance (68)
- ☐ clearcon (58)
- ☐ ofccpwebinar (57)
- ☐ ofccpresource (35)
- ☐ recruitmentwebinar (29)
- ☐ veterans (24)
- ☐ recruitment marketing (23)
- ☐ diversity (21)

[Disability 101: Understanding Disability in the Workplace](#)
[Library Entry](#)

[#webinarsandpresentations #disability #ofccpwebinar](#)
[20150625\\_mccoyartiles.pdf](#)

[OFCCP Compliance / Employment Law](#)
[disability](#)
[ofccp compliance](#)
[Resources](#)


[Long-term disability claim form](#)
[Library Entry](#)

[UNUM ltd claim form-9-5-17.pdf](#)

[Short-term disability claim form](#)
[Library Entry](#)

[UNUM std claim form-9-5-17.pdf](#)

[People with Disabilities Affinity Network](#)
[Library Entry](#)




Team DE

Added 06-25-2015

[View Library](#)

[View Community](#)




Lis Dennis

Added 09-14-2017

[View Library](#)

[View Community](#)



Lis Dennis

Added 09-14-2017

[View Library](#)

[View Community](#)

## Upcoming Events

21

JULY

### Removing the Online Obstacles to Employment: Getting Your Website OFCCP Compliant

Webinar - External

Jul 21, 2:00 PM - 3:00 PM (ET)

24

JULY

### Celebrating ADA30: A Discussion on Youth Employment from the ADA Generation

Webinar - External

Jul 24, 1:00 PM - 2:00 PM (ET)

## Benefits

- ✓ Expanded connection to individuals with disabilities to better assist with outreach and hiring initiatives
- ✓ Automated job delivery to over a thousand vetted vocational rehabilitation representatives
- ✓ Reporting available in PDF, Excel, and Word formats

**Accelerate your outreach to individuals with disabilities by contacting Tom Eckhart:**

**Tom@DirectEmployers.org**  
**317.874.9101**



\*Not Included In Membership

# Regulatory References

## Required Notices

- REF: 41 CFR §60-1.4 (a)(1) Equal opportunity clause.
- REF: 41 CFR §60-1.42 Notices to be posted.
- REF: 41 CFR §60-1.35 Contractor obligations and defenses to violation of the nondiscrimination requirement for compensation disclosures.
- REF: 41 CFR §60-300.5 (a)(9) Equal Opportunity Clause.
- REF: 41 CFR §60-741.5 (a)(4) Equal Opportunity Clause.
- REF: Title VII of the Civil Rights Act of 1964 SEC. 2000e-10 [Section 711] Posting of Notices.

## Accommodations

- REF: 41 CFR §60-741.21(a)(6)(iii) Prohibitions.
- REF: 41 CFR §60-300.21(f) Prohibitions.
- REF: Americans with Disabilities Act of 1990, as amended. Title 42 Chapter 126 – Subchapter I - Employment [Title 1] Sec 12112. Discrimination.

## Policy Statement & AAP Availability

- REF: 41 CFR §60-300.44 (a) Required contents of affirmative action programs.
- REF: 41 CFR §60-741.44 (a) Required contents of affirmative action programs.
- REF: 41 CFR §60-300.41 Availability of Affirmative Action Program.
- REF: 41 CFR §60-741.41 Availability of Affirmative Action Program.

# Regulatory References

## Tagline

- REF 41 CFR §60-1.41 Solicitations or advertisements for employees.
- REF 41 CFR §60-300.5 (a)(12) Equal opportunity clause.
- REF 41 CFR §60-741.5 )a)(7) Equal opportunity clause.





## Outreach & Positive Recruitment

- REF: 41 CFR §60-300.44 (f)(1) Required Contents of Affirmative Action Programs
- REF: 41 CFR §60-741.44 (f)(1) Required Contents of Affirmative Action Programs
- REF: 41 CFR §60-300.44 (f)(3) Required Contents of Affirmative Action Programs
- REF: 41 CFR §60-741.44 (f)(3) Required Contents of Affirmative Action Programs

# Connect






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