



**DirectEmployers
Association**

Legal Roundtable Masterclass

March 24, 2022

**The Pros and Cons of OFCCP Functional Affirmative
Action Plans, Including Use with a Remote
Workforce**

Today's Presenters



**Dr. Robert Speakman,
Jr., Ph.D**

Managing Director
Secretariat Economists



Soul Cherradi

Manager of HR
Compliance & DE&I
BP



John C. Fox, Esq.

President & Partner
Fox, Wang & Morgan
P.C.

Documents & Links Related to FAAPs

1. Current OFCCP Directive 2013-01 Revision 2 (expiring June 20, 2022) regarding Functional Affirmative Action Programs: <https://www.dol.gov/agencies/ofccp/directives/2013-01>
2. Federal Contract Compliance Manual discussion of FAAPs: <https://www.dol.gov/agencies/ofccp/manual/fccm/chapter-5-functional-affirmative-action-program-compliance-evaluations>
3. U.S. Department of Labor's General FAAP FAQs: <https://www.dol.gov/agencies/ofccp/faqs/faap>
4. [DirectEmployers Association Week In Review for February 14, 2022: Comment Now on Functional Affirmative Action Program Directive Updates](#) (Comment period closes April 11, 2022)
5. OFCCP Notice seeking comments on proposal to renew and update information collection for supply and service contractors seeking approval to develop Functional Affirmative Action Programs: <https://www.federalregister.gov/documents/2022/02/09/2022-02652/agreement-approval-process-for-use-of-functional-affirmative-action-programs-proposed-approval-of>
6. Proposed OFCCP Directive 2013-01 Revision 3: https://de.nlx.org/pdfs/ofccp-wir/Proposed-OFCCP-Directive-2013-01_Revision3.pdf