

AAP's ~ Mid-Year Check Up

Best Practices Compliance Tools & Tips OFCCP Updates



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Responsible for providing guidance to Members on compliance matters related to Affirmative Action, audit advocacy and additional education surrounding government contractor obligations.

**July 18, 2017
Presenters**

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President & Partner, Fox, Wang, & Morgan P.C.
Represents companies and tries cases in state and federal courts throughout the United States. Previously Executive Assistant to the Director of the OFCCP.



Agenda

Women & Minorities, Protected Veterans and Individuals with Disabilities...Oh My!

- Overview of the various AAP's
- Best Practices for a Mid-Year Check Up

Outreach

- OFCCP Expectations
- Member Tools

OFCCP Updates

- The latest on “The Merger” and OFCCP's FY2018 budget roller coaster.

Q&A

Which AAP's apply to me?

We have more than 50 employees and a *Government Contract of:

<input type="checkbox"/> \$50,000 or more	<input type="checkbox"/> \$50,000 or more	<input type="checkbox"/> \$150,000 or more
We need an AAP for:	We need an AAP for:	We need an AAP for:
Executive Order 11246 Women & Minorities	Section 503 Individuals with Disabilities	VEVRAA Protected Veterans

*Non-Construction

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Polling Question

How many AAP's does your company have?

- 1) We have a functional AAP
- 2) Under 5
- 3) 6 – 15
- 4) 16 – 25
- 5) 26 or more
- 6) I'm not sure

Best Practice: Review AAP Components Mid-Year

Executive Order 11246 Women & Minorities	Section 503 Individuals with Disabilities	VEVRAA Protected Veterans
<u>METRICS:</u> ➤ Placement Goals	<u>UTILIZATION GOAL:</u> ➤ 7% <u>utilization</u> (per *job group)	<u>BENCHMARK FOR HIRING:</u> ➤ 6.7% <u>hiring</u> (per establishment)
➤ Action Oriented Programs (Good Faith *Efforts)	➤ Action Oriented Programs	➤ <i>Implied</i> Action Oriented Programs
	<input type="checkbox"/> Review of Personnel Processes	<input type="checkbox"/> Review of Personnel Processes
	<input type="checkbox"/> Review of Physical & Mental limitations	<input type="checkbox"/> Review of Physical & Mental limitations
	<input type="checkbox"/> Reasonable Accommodation	<input type="checkbox"/> Reasonable Accommodation
	<input type="checkbox"/> Harassment Prevention	<input type="checkbox"/> Harassment Prevention
	<input type="checkbox"/> External Dissemination of Policy, Outreach & Positive Recruitment	<input type="checkbox"/> External Dissemination of Policy, Outreach & Positive Recruitment
	<input type="checkbox"/> Internal Dissemination	<input type="checkbox"/> Internal Dissemination
	<input type="checkbox"/> Training	<input type="checkbox"/> Training
Internal Audit & Reporting System	<input type="checkbox"/> Internal Audit & Reporting System that Measures Effectiveness	<input type="checkbox"/> Internal Audit & Reporting System that Measures Effectiveness
		<input type="checkbox"/> List openings with ESDS (<i>Local One-Stop Career Centers</i>)
	▪ Annual Data Analysis	▪ Annual Data Analysis

*Efforts = Outreach

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Polling Question

I am responsible for:

- 1) Talent Acquisition/Recruitment
- 2) Compliance/EEO Administrator
- 3) Both
- 4) Other



EO 11246: Women & Minorities Best Practices Mid-Year

Executive Order 11246 Women & Minorities

METRICS:

➤ Placement Goals

➤ Action Oriented Programs
(**Good Faith *Efforts**)

Best Practice: Run mid year reports:

- ☐ How are you doing on your Good Faith Efforts?
- ☐ Have you let your recruiters and top-level management know?

What did you say you would do?

***Efforts = Outreach**

- ☐ Have you done it?
- ☐ Are you doing it?

Clean up Expression of Interest Log!

- ☐ Ensure all true “applicants” have a proper status and/or disposition code.
 - Why not an applicant?
 - Why applicant fell out of process (nondiscriminatory reason(s))
- ☐ Close evergreen requisitions (ideally every 30 days).

Internal Audit & Reporting System

✓ You are doing it now! Write it down!

Section 503: IWD

Best Practices Mid-Year

Section 503 Individuals with Disabilities	
UTILIZATION GOAL	
➤ 7% utilization (per *job group)	
➤ Action Oriented Programs	
<input type="checkbox"/> Review of Personnel Processes	
<input type="checkbox"/> Review of Physical & Mental limitations	
<input type="checkbox"/> Reasonable Accommodation	
<input type="checkbox"/> Harassment Prevention	
<input type="checkbox"/> External Dissemination of Policy, Outreach & Positive Recruitment	
<input type="checkbox"/> Internal Dissemination	
<input type="checkbox"/> Training	
Internal Audit & Reporting System Measuring Effectiveness	
▪ Annual Data Analysis	

What did you say you would do?

- Have you done it?
- Are you doing it?

Review your career site.

- Is there a way to ask for a reasonable accommodation to apply?
- What happens when you call/email it?

Are policies & procedures in place?

- DE Members: What's in your PRM (Partner Relationship Manager)?
- Where have you gone? What have you done? How effective was it?

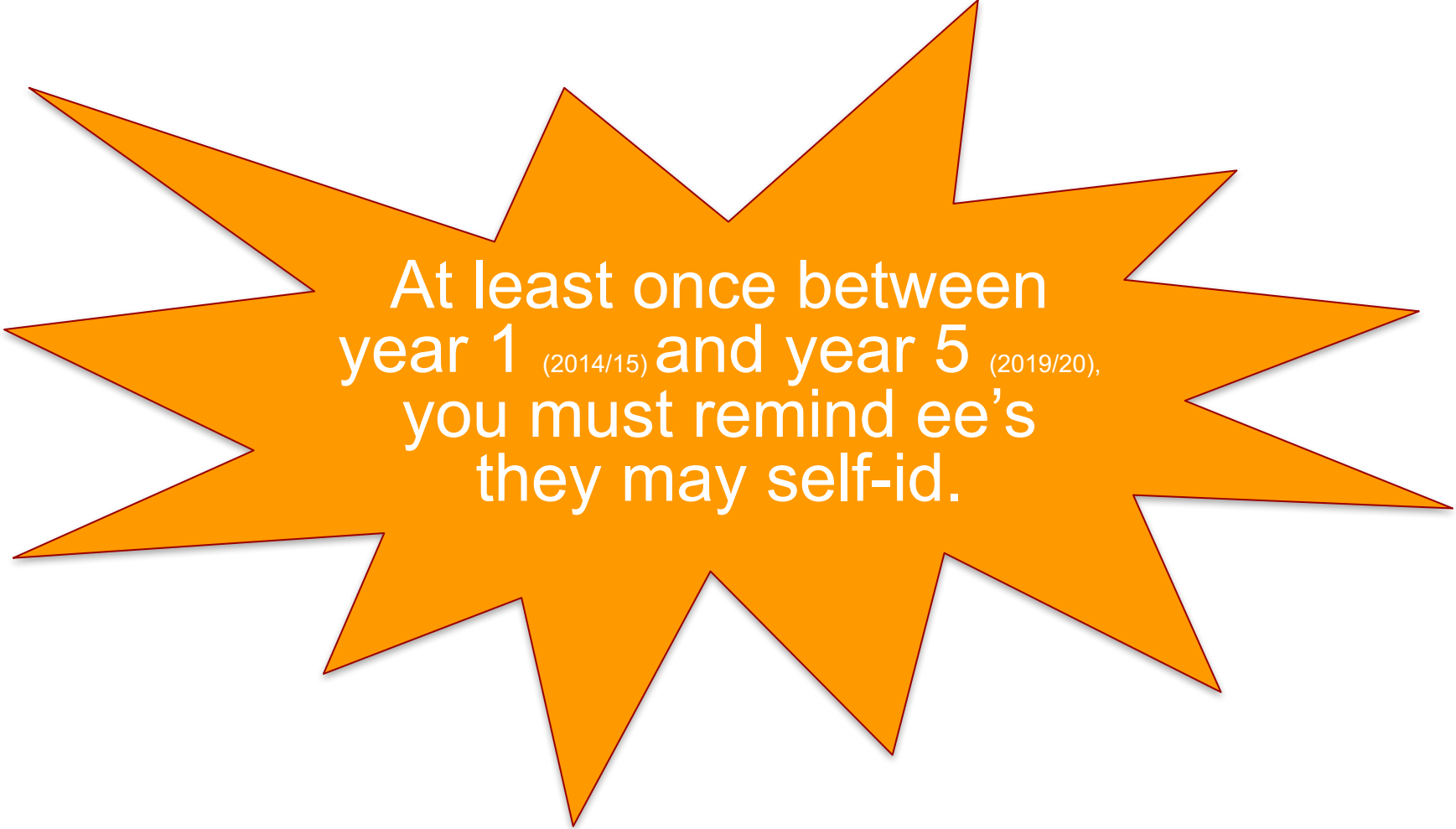
Is your EEO poster up? Supplement too?

Do your hiring managers understand their role?

✓ You are doing it now! Write it down!

Best Practice: Run mid year reports:

- (1) The number of applicants who self-identified as IWD
- (2) The total number of job openings and total number of jobs filled;
- (3) The total number of applicants for all jobs;
- (4) The number of applicants with disabilities hired; and
- (5) The total number of applicants hired.

A large, orange, multi-pointed starburst shape with a dark red outline, centered on the slide. It has approximately 12 points of varying lengths, creating a jagged, star-like appearance.

At least once between
year 1 (2014/15) and year 5 (2019/20),
you must remind ee's
they may self-id.

National Disability Awareness Month is October...

What do you have planned?

Visit www.dol.gov/odep/topics/ndeam

DE Members – maximize your benefits!

Reach out to our partners for assistance, support and ideas!

- Autism Speaks
- C5 consulting
- Employer Assistance & Resource Network (EARN) & Workforce Recruitment Program (WRP)
- Easterseals
- Enable America
- National Federation of the Blind
- Cornell University's Yang-Tan Institute
- National Organization on Disability (NOD)
- OurAbility
- Think Beyond the Label
- National Multiple Sclerosis Society

<http://directemployers.org/partners/disability-partners/>

VEVRAA: Protected Veterans Best Practices Mid-Year

VEVRAA Protected Veterans

BENCHMARK FOR HIRING

➤ 6.7% **hiring** (per establishment)

➤ *Implied* Action Oriented Programs

☐ Review of Personnel Processes

☐ Review of Physical & Mental limitations

☐ Reasonable Accommodation

☐ Harassment Prevention

☐ External Dissemination of Policy, **Outreach & Positive Recruitment**

☐ Internal Dissemination

☐ Training

Internal Audit & Reporting System
Measuring Effectiveness

☐ List openings with ESDS (*Local Career One –Stop Center*)

▪ Annual Data Analysis

- DE Members: What's in your PRM (Partner Relationship Manager)?
- Have you contacted the Vet rep receiving your daily job listing?
- Where have you gone?
- What have you done?
- How effective was it?

- ✓ DE Members: Job Listing completed daily for you!
- Non-Members: Are you listing all openings?

Best Practice: Run mid year reports:

- 1) The number of applicants who self-identified as PV's
- 2) The total number of job openings and total number of jobs filled;
- (3) The total number of applicants for all jobs;
- (4) The number of protected veteran applicants hired;
- (5) The total number of applicants hired.

VetCentral Reporting and Confirmations (Members)



Job Order Ad Hoc Compliance Report

Company Name: Member Company Name

FEIN: XX-XXXXXXX

Report for jobs received between 3/1/2015 and 3/31/2015

Report Date: 4/28/2015 8:25:01 AM

Total Jobs: 140

Delivery Confirmed: 140

Pending Delivery: 0

Awaiting Confirmation: 0

Other: 0

Provided by VETcentral: for DirectEmployers Association:

Contact DEA at:

Phone: 866-268-6206

Email: info@directemployers.org



For this job please click on the 'URL to Apply' below.

To open a new browser window, please copy and paste the URL to the URL location of a new browser window.

[Contact Us](#) [A A](#)

[Email this Job](#)

Title: CPG - Supply Chain Analyst (Charleston, WV or Columbus, OH)

Company: Member Company Name

Location: Columbus, OH

URL to Apply: <http://my.jobs/2345kj1245k245151j1415h1132499>

Company URL: <http://www.companyname.com/>

Employer Job ID: 915796

VETcentral Job ID: 26782606

Description: VEVRAA Federal Contractor
Request Priority Protected Veteran Referrals
EOE Minorities/Females/Protected Veterans/Disabled
Contact Email: 2345kj1245k245151j1415h1132499@my.jobs

The Supply Chain Analyst reports to the Manager, Procurement Operations. The Supply Chain Analyst is responsible for meeting tactical purchase order fulfillment needs for COMPANY NAME business units. The Supply Chain Analyst is also accountable for expediting orders, resolving invoice disputes and handling material returns to meet business unit purchasing needs. The Supply Chain Analyst collects and analyzes data to build total cost of ownership models, supplier performance, market based pricing for supplier selection and team performance against internal service performance metrics. The Supply Chain Analyst must possess an ability to work in a fast-paced, changing environment and still meet business performance measures, timelines for procurement activities and plan for future material and supplies needs of the business units.

Fulfills basic order and purchase requests for materials and supplies with established suppliers

Expedites orders and resolves invoice disputes

Handles material returns and ensures appropriate credits are applied

Negotiates prices for materials and supplies with established suppliers

Monitors and maintains key purchasing data including but not limited to order price lists, lead times, catalogue price lists

Communicates and keeps team members and business units aware of purchasing alternatives, delivery constraints, costs and benefits

Identifies cost savings and cost avoidance opportunities

Performs multiple supplier bid analysis utilizing total cost of ownership

Adheres to purchasing policies and procedures

Works with special projects and special analysis involving management directed by Manager, Procurement

Job Title	Job Address	Employer Job ID	Compliance ID	Status	Center Name	Sent to Address	City, State, Zip
CPG - Supply Chain Analyst (Charl)	Columbus, OH	915796	16773235	Delivery Confirmed	Central Ohio Workforce Inv	Robert.Okeefe@jfs.ohio.gov	Columbus, OH 43
CPG - Supply Chain Analyst (Charl)	Charleston, WV	915796	16766158	Delivery Confirmed	Workforce West Virginia - C	workforcefederalcontractor	Charleston, WV 2
CPG - Sr Business Integration Anal	Charleston, WV	915797	16773236	Delivery Confirmed	Workforce West Virginia - C	workforcefederalcontractor	Charleston, WV 2
CPG - Sr Business Integration Anal	Houston, TX	915797	16773237	Delivery Confirmed	THE WORKSOURCE NORTH	stanley.brown@tvc.texas.gov	HOUSTON, TX 770
NIS - Area Supervisor Line (Centra	LaPorte, IN	915799	16773365	Delivery Confirmed	LaPorte Sagamore Center	bmoeyer@gotoworkonenw.c	LaPorte, IN 46350
NIS - Area Supervisor Line (Centra	LaPorte, IN	915799	16773365	Delivery Confirmed	LaPorte Sagamore Center	bmoeyer@gotoworkonenw.c	LaPorte, IN 46350
NIS - Pipeline	Monticello, IN 47						Columbus, OH 43
NIS - Pipeline	Washington, PA 1						New Castle, PA 1
NIS - Pipeline	LEMONT FURNAC						York, PA 17404-08
NIS - Pipeline	LaPorte, IN 46350						PITTSBURGH, PA 1
NIS - Intern	Fort Wayne, IN 4						Charleston, WV 2
Field Engine	Columbus, OH 43						
NIS Supervisor	Washington, PA 1						
CPG - IT App	Washington, PA 1						
CPG - Financial Analyst Job Family	Columbus, OH	915785	16743395	Delivery Confirmed	Central Ohio Workforce Inv	Robert.Okeefe@jfs.ohio.gov	Columbus, OH 43
CPG - Land Agent 3 - Washington	Washington, PA	915773	16743394	Delivery Confirmed	PA CareerLink Washington	csaiocuns@pa.gov	Washington, PA 1

- OFCCP VetCentral reports available in PDF and Excel formats
- Reports kept on file for 5 years
- Unlimited access, users, and training included in membership.

DirectEmployers

Veterans Day is November 11th...

What do you have planned?



<http://www.naswa.org>

DE Members – maximize your benefits!

Reach out to our partners for assistance,
support and ideas!

- Corporate America Supports You (CASY)
- USDOL's Veterans.gov
- DOD's Education & Employment (E2i)
- Military Spouse Corporate Career Network
- Student Veterans of America (SVA)
- U.S. Chamber of Commerce Foundation's Hiring our Heroes
- AMVETS
- Easterseals
- USA Cares

<http://directemployers.org/partners/military-veteran-partners/>

Outreach Best Practices: Tools & Tips



What will the OFCCP accept for outreach?

- No third party outreach
- No more automation – Relationships must be built
- Emails of job listings with no personal communication will not suffice
- Critical evaluation of the effectiveness of outreach efforts is essential
- Are you getting to your 6.7% hiring benchmark for veterans and 7% utilization goal for individuals with disabilities?



Sample Assessment of Outreach and Recruitment Activities

Outreach/Recruitment Activity	Date of Activity	Description	Evaluation
Listed job openings with local Veteran Advocacy Group.	Ongoing	In addition to listing openings with local Employment Service Delivery System (ESDS), openings are also listed with a local Veteran Advocacy Group.	Received 32 applications from protected veterans, of which 4 were hired. This is an effective activity.
Briefing of Vet-Reps in local community college campus	July 15, 2014	Briefed Vet-Reps of Contractor's services and current hiring needs.	Will begin sending job listings to Vet-Reps for assistance in attracting veteran applicants. This is an ongoing effort and we will monitor the success of this initiative.
Participated in Veteran Job Fair	November 13, 2014	Veteran Job Fair was hosted by local veterans' groups, and over 30 employers participated.	Received 25 applications from qualified veterans. Conducted 15 initial interviews. 10 follow-up interviews were scheduled, which resulted in 3 hires. This is a successful outreach effort.

Criteria for Evaluation:

1. Did the activity attract qualified applicants who are protected veterans?
2. Did the activity result in the hiring of protected veterans?
3. Did the activity expand Contractor's outreach to protected veterans in the community?

Partner Relationship Manager: (Members)

Use technology to manage outreach!

MyJobs • My jobs Employers ▾

DirectEmployers Association

Partner Relationship Manager

Add Your First Partner

Create a Partner

Already have the right partner? Enter it here.

NEXT →

Search OFCCP Partner Library

Search for and find the right partner for you!

NEXT →

MyJobs • My jobs Employers ▾ aj@directemployers.org ▾

Member Company Name Partner Company Name

Overview Back to Partner Relationship Manager

Most Recent Communication Record

Staying in touch...
Jan 16, 2015, 11:24 a.m. - Email
Created by: aj@directemployers.org

[View](#)

[Manage Records](#)

Most Recent Saved Search

Member Company Jobs in City, State Inactive
Sent to: deaprm@gmail.com

[View](#)

[Manage Searches](#)

442
Contact Records
30 Days

408
Emails

28
Phone Calls

6
Meetings or Events

[View Reports](#)

Partner Company Name

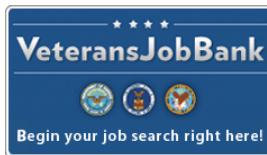
Partner Contact Name Primary Contact
email@emailaddress.com
555-555-5555

[Edit Partner Details](#)

PRM designed to:

- Simplify maintaining partner contacts and tracking outreach efforts.
- Record details regarding hiring activity from a partner.
- Run reports that capture outreach efforts and their effectiveness.
- Pull contacts from the OFCCP's Employer Resource Referral Directory into your database with one click!

1,000+ Job Distribution Partner Sites



✓ DE gets your jobs there

❑ Build the relationships and get the hires!



Analytics (Members)

Secure.my.jobs

- Employers
- Reports
 - PRM
 - Analytics



A new dashboard allows the user to select either PRM Reports or three report options within Analytics.

Acme Co.

The screenshot shows a dashboard for "Acme Co." with a "Reports" tab. It features two main sections: "PRM Reports" and "Analytics". The "PRM Reports" section includes a laptop icon and text about monitoring PRM instance performance. The "Analytics" section includes a laptop icon and text about viewing web site performance. Below the "Analytics" section, there are three sub-sections: "Job Owner Syndication", "Site Owner Syndication", and "Site Traffic", each with a bar chart icon and a brief description of the metrics they track.



Select any of the options below the Analytics title to view job view metrics.

1. **Job Owner Syndication:** Job view metrics specifically related to the 1,000+ syndicated partner sites and any referring sites.
2. **Site Owner Syndication:** Types of job views on company-owned recruitment marketing sites and job views that occurred initially from referring sites.
3. **Site Traffic:** Analyze performance of .JOBS Career Sites and/or individual company-branded Member Microsites by reviewing page visits and views.

Polling Question

At this point, I feel our AAP's are:

- 1) In great shape! Audit ready!
- 2) Fair, but we have work to do.
- 3) Poor, we have lots to do.
- 4) I'm not sure?



OFCCP Updates



- **The “Merger” is stalled.**
- **OFCCP Budget troubles continue.**
- **What does it all mean?**

QUESTIONS?



Week In Review “WIR”

Mondays – Catch the prior week’s hot topics and breaking news with the



Legal updates with the
“HR Bottom Line”

Keeping you informed and compliant!