

AREA OF PRACTICE

Affirmative Action & OFCCP Compliance

We have a national practice guiding federal contractors and subcontractors through the complex laws and regulations specific to their Affirmative Action obligations, including Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, and the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA).
Affirmative Action Plan (AAP) Preparation

Our focus is helping our clients meet their obligations with regard to the Affirmative Action and EEO requirements for women, minorities, veterans, and the disabled. To make this happen, we prepare custom Affirmative Action Plans (AAPs) to ensure the most favorable outcome for each individual establishment. This process includes:

- Developing job groups
- Gathering and customizing labor market data
- Preparing all statistical reports, including availability, utilization and goals reports
- Drafting all narrative elements
- Conducting adverse impact analyses by job group for hires, promotions and terminations for the prior year's activity and reporting those results
- Conducting compensation analyses by cohort (job group, job title, or grade) and reporting the results
- Actively consulting on Affirmative Action compliance, strategies and related issues
- Evaluating existing programs and making recommendations for improvement

OFCCP Compliance Audit Defense

In the event that the Office of Federal Contract Compliance Programs (OFCCP) initiates a compliance review for your organization, our attorneys stand ready to assist with every step of the audit. From receipt of the scheduling letter to resolution, we work proactively with management to prepare and review all materials required for submission to the OFCCP. If potential issues are identified, we help to develop explanations and solutions to resolve these matters efficiently and effectively.

Representative Services

- Preparing comprehensive and customized Affirmative Action Plans (AAPs)
- Formulating OFCCP desk-audit submissions
- Responding to OFCCP information requests
- Preparing for and managing OFCCP compensation interviews and on-site audits
- Assisting with applicant tracking and recordkeeping
- Preparing and filing EEO-1 and VETS-4212 reports
- Conducting detailed adverse impact and compensation analyses as needed
- Providing training on Affirmative Action/EEO obligations, AAP implementation, adverse impact, compensation analysis, recordkeeping, and audit procedures/best practices.

Attorneys

- **Seth P. Briskin, Chair**
- **Joseph C. Pokorny**
- **Lester W. Armstrong**

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