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The Office of Federal Contract Compliance Programs (OFCCP):

What does the OFCCP do?

The OFCCP endorses the three EEO laws that apply to Federal Contractors. They are as follows:

1. **Executive Order 11246 (as amended)**. This order prohibits federal contractors and subcontractors from discriminating in employment and requires affirmative action to ensure equal employment opportunities on the basis of race, color, religion, sex or national origin.
2. **Section 503 of the Rehabilitation Act of 1973 (as amended)**. This section prohibits supply, service and construction contractors and their subcontractors from discriminating in employment on the basis of disability. It also requires that these contractors take affirmative action to employ and advance in employment, qualified individuals with disabilities.
3. **Vietnam Era Veterans Readjustment Assistance Act of 1974 (VEVRAA)**. This Act prohibits supply, service and construction contracts and their subcontractors from discriminating in employment against veterans. It also requires that these contractors take affirmative action to employ and advance veterans. Despite its' name, VEVRAA applies equally to disabled veterans, Armed Forces Service Medal veterans, recently separated vets and other protected veterans.

Looking for help? See Springboard's list of most requested topics. If any interest you call us! 973-813-7260

- Consulting
- Training
- Marketplace
- Workplace/Workforce Offerings
- ADA/ADAAA
- Event Coordination & Planning

OCTOBER is ...

**NATIONAL
DISABILITY
EMPLOYEMENT
AWARENESS
MONTH**

**How will you celebrate?
Let Springboard help!**

**Contact Jill Frankel at
jill@consultspringboard
.com and via telephone
at 973-813-7260 x. 106**

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The Office of Federal Contract Compliance Programs (OFCCP) - Continued:

The OFCCP shares enforcement responsibilities with other Federal agencies such as in the administration of Title I of the Americans with Disabilities Act of 1990, ADA (as amended).

What are the OFCCP's most common enforcement activities?

- Compliance assistance
- Compliance evaluations
- Desk audits
- On-site investigations
- Complaint investigations
- Conciliation and enforcement actions

How do I know if my company/employer is considered a contractor as defined by the OFCCP?

Generally speaking, a company is a contractor and is covered by EEO laws enforced by the OFCCP if it enters into a non-exempt contract or subcontract with any department, agency, establishment or instrumentality of the executive branch of the Federal government for the purchase, sale or use of supplies or services.

Why this topic and why now?

The reason for the addressing this topic and for doing so at this time is because of the heightened concentration of enforcement, specifically at it relates to Section 503 compliance.

It is for this reason that the remainder of this article will focus on the OFCCP's enforcement of Section 503.

What should be expected at an on-site review?

When the OFCCP conducts an on-site review of this nature, it will investigate outreach efforts to the community of individuals with disabilities as well as the success of those efforts.

They will consider good faith efforts but if the contractor is not successful in recruiting people with disabilities, they will want to know why, making it clear that this is not just

about “checking the box”. They are looking for evidence of the outreach along with measurable results as a result of the outreach.

Outreach may include such things as communication with college placement offices. While this type of outreach may prove to be beneficial, it is Springboard’s recommendation to conduct outreach directly to the office of disability student services. In most cases, this form of college outreach yields better success for both the student and the contractor. Another form of acceptable outreach is to appropriately depict individuals with disabilities in contractor marketing materials. Doing so will yield additional business benefits such as revenue generation from what will be seen as directly marketing to this large, loyal segment of the population.

Another component of the on-site review is for the OFCCP to ask to see the completed invitations for individuals to self-identify. They will want to see how the invitations are extended and what efforts are made if any to increase the likelihood that applicants would complete the invitation.

Such efforts to increase self-identification may be to describe your company’s disability etiquette and awareness training or share information about your firm’s disability employee resource group. Having such programs and describing them to applicants has shown to increase a willingness to self-identify.

Keep in mind, that the OFCCP will investigate internal mechanisms for informing applicants and employees of their contractors’ OFCCP related obligations and at any time, applicants and employees with disabilities may be interviewed and asked if they are aware of their rights under the contractors Affirmative Action Plan(AAP) and if so, if they have ever exercised their rights.

Of course, other information may also be requested such as:

- All position descriptions to check whether physical or mental job requirements are included.
- Reasonable accommodation policies
- Copies of all disability related grievances
- List of all known employees who have a disability.
- Copies of information provided to applicants concerning reasonable accommodations.

When it comes to on-line accessibility, the OFCCP may inquire whether the contractors’ website is compatible with the most common assistive technology software. They may also investigate the avenues for applicants and employees to request accommodations if there are electronic barriers to the application or employment process.

What are some programs and/or initiatives a contractor should consider to in-

The Office of Federal Contract Compliance Programs (OFCCP) - Continued:

What are some programs and/or initiatives a contractor should consider to increase compliance?

- A comprehensive corporate assessment
- A Reasonable Accommodation Committee
- Disability Etiquette & Awareness Training
- A Disability Employee Resource Group
- A working relationship with the office of disability services at colleges and universities

It also helps when you can show your CEO and/or senior executives speak about the company's commitment to hiring and supporting people with disabilities.

How can we obtain additional information from the OFCCP?

You can learn more about the OFCCP by visiting their web site at <http://www.dol.gov/esa/ofccp/> or by calling 800-397-6251.

Can Springboard help?

Springboard Consulting LLC can collaborate with you on these and many other related initiatives to ensure OFCCP compliance and overall success in recruiting and supporting people with disabilities in the workforce and workplace.

Partner with Springboard and go way above compliance to become an Employer of Choice for this large, loyal segment of the population.

Call Springboard today to learn more at 973-813-7260 or emailing us at info@consultspringboard.com.

###

Springboard's Features:

2011 - Disability Matters Awards Banquet & Conference:



5th Anniversary!

The 2011 Disability Matters Event

REMEMBER TO SAVE THE DATE
April 6 & 7, 2011!

With Cisco and Northrop Grumman Corporation as the Host Sponsors of the 2011 event, which is being held in San Jose, CA at Cisco's headquarters, is sure to be an event you don't want to miss!

INTERESTED IN SPONSORING

Join our current sponsors on the 2011 journey...

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There's more! ...

The BRONZE Sponsor (s):

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And more are coming! ...

For more information about sponsorship and other ways in which to participate, please visit <http://www.consultspringboard.com/category/disability-matters-2011/> or contact Jill Frankel at jill@consultspringboard.com, T: 973-813-7260 x. 106.

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The ADA/ADAAA Information Kits:

ARE NOW AVAILABLE FOR SALE!

As you probably already know, July 26, 2010 was the 20th Anniversary of the Americans with Disabilities Act. In celebration of that momentous occasion and in response to your overwhelming requests, Springboard is pleased to offer a comprehensive [ADA Information Kit](#) for Employers.

The kit, titled, *Disability Discrimination in the Workplace, A Non-Legal Approach to ADA Basics for Employers*, will provide you with critical information and guidance on topics such as:

- Why the ADA is Important to Employers
- What Businesses say about the Value of Employees with Disabilities
- The Laws Prohibiting Job Discrimination based on Disability
- What is Disability Discrimination
- What are my General Responsibilities as an Employer
- When Can Employers Ask Questions about Someone's Disability

The [ADA Information Kit](#) also includes:

- Three Discrimination Quiz's and comprehensive answer keys
- Twenty Practice Tips
- An Autographed Copy of DIVE IN
- A \$100 Gift Certificate which can be used toward any of Springboard's ADA related webinars and workshops

You may be wondering who these information kits are for. They are for:

- Diversity and Work-Life Professionals
- Human Resource Professionals
- Talent Acquisition and Sourcing Professionals
- Recruiters
- Anyone who Manages People
- Corporate Disability Liaisons
- EEO and Compliance Professionals

Order your [ADA Information Kit](#) TODAY!

To order 5 or more kits at a discounted price, [click here](#) to download an order form (PDF). Please print and fill out the [order form](#) inclusive of billing information at fax to Springboard at 973-813-7261 or email to jill@consultspringboard.com. Allow 2 to 3 weeks for delivery.

For additional questions, please email us at info@consultspringboard.com or to speak with a Springboard Representative, please call 973-813-7260.

All major credit cards accepted.

We look forward to receiving your order!

ERG Disability Leadership Forum:

WHAT: A Disability Employee Resource Group (ERG) Leadership Networking Forum.

WHEN: Quarterly.

FOR WHOM: Up to two Disability ERG Leaders per company.

HOW: By conference calls that will be hosted and facilitated by Springboard Consulting.

WHY: Because you, our most valued clients and partners have asked for it.

PURPOSE: For Disability ERG Leaders across Corporate America (all industries) to learn from each other. To share the unique needs and/or issues, trials & tribulations, successes, concerns, interests and overall best practices when launching, growing and maintaining a disability affinity or constituency group.

SUBSCRIPTION*: **\$2,500 for the first year - Limited Time Offer!** Sign-up by September 30 and receive an additional 20% off (\$2,000 for the first year - mention code: ERGLNF20). ***Subscriptions requests received after October 15 will be billed at the standard subscription fee of \$3,500 per year.)**

REGISTER TODAY!

Call 973-813-7260 X102 or email us at info@consultspringboard.com

We look forward to networking you with like-minded and interested leaders throughout Corporate America.

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14 Glenbrook Drive ▪ Mendham, NJ 07945 ▪ T: 973-813-7260 ▪ F: 973-813-7261 ▪ www.consultspringboard.com

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