



THE OFCCP INSTITUTE

SEPTEMBER 24TH 2013 - One Day Training Program Agenda

- 8:30 – 9:00 Registration and Light Breakfast
- 9:00 – 9:15 Introductions and Seminar Overview
- 9:15 - 10:00 503 & VEVRAA Rulemaking Process
- Rulemaking Process
 - NPRM to Final Rule
 - OMB/OIRA Review and Final Outcome
 - Regulatory Effective Date
 - When to implement changes?
 - Issues with implementing early—potential ADA violation.
 - Scheduling Letter Implications
 - Will OFCCP revise the scheduling letter?
 - Current enforcement of new changes?
 - What OFCCP field staff are doing today.
- 10:00 – 10:30 Overview of the New 503/VEVRAA Regulations
- What's In and What's Out
 - Major Rule Changes
- 10:30 - 10:45 Morning Break
- 10:45 – 12:00 The New 503/VEVRAA Regulations—Understanding the Details
Module 1: Surveying Applicants
- Pre-Offer Self Identification of Protected Veteran/ Disability Status
 - Conflicts with ADA?
 - OFCCP Prescribed Form
 - Visual identification of Applicants/Employees who do not self-identify?

- Post-Offer Pre-Employment Self Identification
 - What is required?
 - Best Practices
- Defining an Applicant
 - Internet Applicant Rule – Does It Apply?
- Periodic survey of Workforce for IWDs and Reasonable Accommodations
 - Frequency
 - Reminders
 - Best Practices
- Maintenance of Disability Data
 - HRIS and ATS Systems
 - Privacy Considerations

Module 2: Making Persons Aware of the Regulatory Programs

- Workplace Posters and Policies
 - What is required and in what format?
- New Contract Provisions and Flow Down Clauses
 - How are these implemented?
- Annual Information to Vendors and Suppliers
- Providing the AAP to Applicants and Employees
 - What Data is Excluded
- State Employment Postings
 - New Annual Requirements

12:00 – 1:00

Lunch Provided

1:00 – 2:30

The New 503/VEVRAA Regulations—Understanding the Details
(cont.)

Module 3: Administering the AAP

- Outreach and Recruitment Efforts
 - Related Assessment
- Periodic Review of Personnel Processes
- Applicant and Hire Data Collection Analytics
- Related Recordkeeping Requirements

Module 4: Administering Disability Goals and VEVRAA Hiring Benchmarks

- 7% Disability Utilization Goal
- 8% Hiring Benchmark
- Differentiating between a “Utilization Goal” and a “Hiring Benchmark”
- Related Recordkeeping Requirements

Module 5: Auditing and Enforcement by OFCCP

- Implications on OFCCP compliance reviews
- Continuing Violation Theory
 - OFCCP codifying the Frito Lay decision in the final regulations.
- Remedies and Penalties under 503 and VEVRAA
 - Debarment, back pay, etc.
- Conciliation Agreements
 - Guarding against utilization goals being used as quotas in Conciliation Agreements.

2:30 – 2:45

Afternoon Break

2:45 – 4:00

The New 503/VEVRAA Regulations—Implementation
Module 6: Implementing 503 and VEVRAA Regulations

- Changes to HRIS and ATS Systems
- 2014 Budgets
- Training
- Effective Date and Implementation

4:00 - 4:15

Questions and Answers and Closing Thoughts