

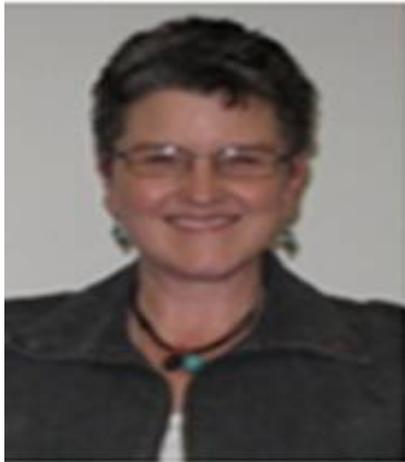


Introducing OFCCP's Newly Revised Federal Contract Compliance Manual (FCCM)

August 27, 2013



Presenters



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FCCM Facts

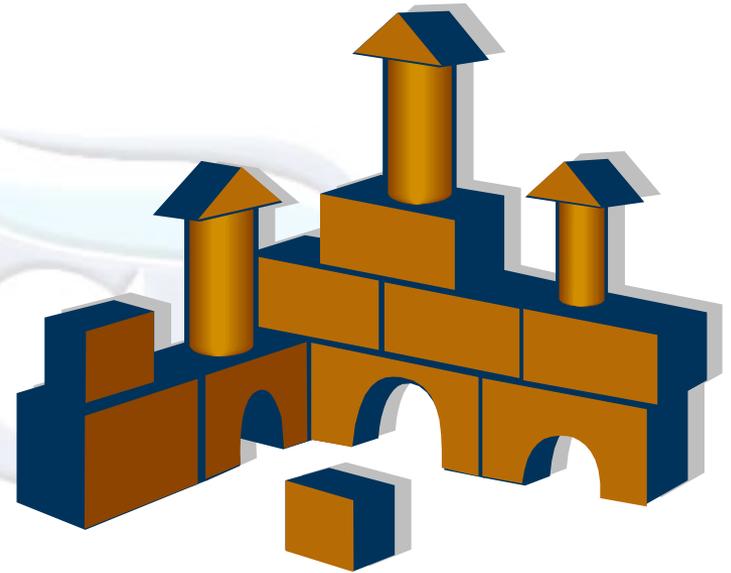
- Last major revision 1988
- Incorporate relevant updates
- Update to current standards
- Does not change the obligations of Federal contractors and subcontractors

Agenda

- Review the structure of the FCCM
- Highlight revisions and additions
- Answer Questions

FCCM Structure

- Eight Chapters
- Key Words and Phrases
- Glossary
- Attachments
 - Sample Forms
 - Letters



Supply & Service Desk Audit - Chapter 1

- Detailed instructions on conducting desk audits
- Updated terminology “compliance evaluation”
- Use the same analytical tools
- Must complete a report
- Standard Compliance Evaluation Report 
 - One form for all types of evaluations
 - Complete only relevant portions of the SCER

Supply & Service Onsite Reviews – Chapter 2

- Detailed instructions on conducting onsite evaluations
-  • Added references to EO13496 Inspection
- Removed references to I-9 Inspection
- Guided questions in the SCER related to determining compliance with requirements



Corporate Management Compliance Evaluations – Chapter 4

- Better Understanding of:
 - Industry
 - Corporate culture
 - Employee development
- Analysis of Personnel Activity and Pay for:
 - Top corporate positions
 - Mid and senior level management
- Uses same tools for desk audit and onsite as described in Chapters 1 and 2



NEW

Functional Affirmative Action Program Compliance Evaluations – Chapter 5

- Establishes the procedures for conducting FAAP compliance evaluations:
 - Scheduled from the National Office FAAP Unit
 - Conducted by the field offices in coordination with the National Office FAAP Unit
 - Evaluation closures coordinated at the National Office level

Poll Question

- The revised FCCM...
 - A. Imposes additional requirements on employers doing business with the Federal Government.
 - B. Provides guidance to OFCCP's compliance officers on the procedures to conduct compliance evaluations and complaint investigations.
 - C. None of the above.

Poll Answer

- The revised FCCM...
 - A. Imposes additional requirements on employers doing business with the Federal Government.
 - B. Provides guidance to OFCCP's compliance officers on the procedures to conduct compliance evaluations and complaint investigations.**
 - C. None of the above.

Construction Industry Compliance Program – Chapter 3

- Procedures for conducting construction evaluations:
 - Removed outdated references:
 - CC-257s
 - Letter of Commitment
 - Updated jurisdictional requirements
 - Section 503
 - VEVRAA



Complaint Investigations – Chapter 6

- Added Guidance on:
 - Initial processing of complaints
 - Dual Filed Complaints
 - Right to Sue Notices
 - Interviewing
 - Investigating complaints of harassment and retaliation



Employment Discrimination Remedies and Resolution of Non-Compliance – Chapters 7 and 8

- Updates:
 - Timeliness
 - Continuing Violation Theory
 - Show Cause Notice Rescission
- Clarifications:
 - Computation of time



Questions



Thanks For Your Participation!

