



# **The Modern Approach: Functional Affirmative Action Programs**

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# Agenda

- Background
- Application and Approval Process
- The Functional AAP
- Advantages of FAAP
- Best Practices
- Questions



# Background

- Final rule issued  
November 13, 2000
- Directive 254 issued  
March 21, 2002
- DIR 2013-01 issued  
December 17, 2012

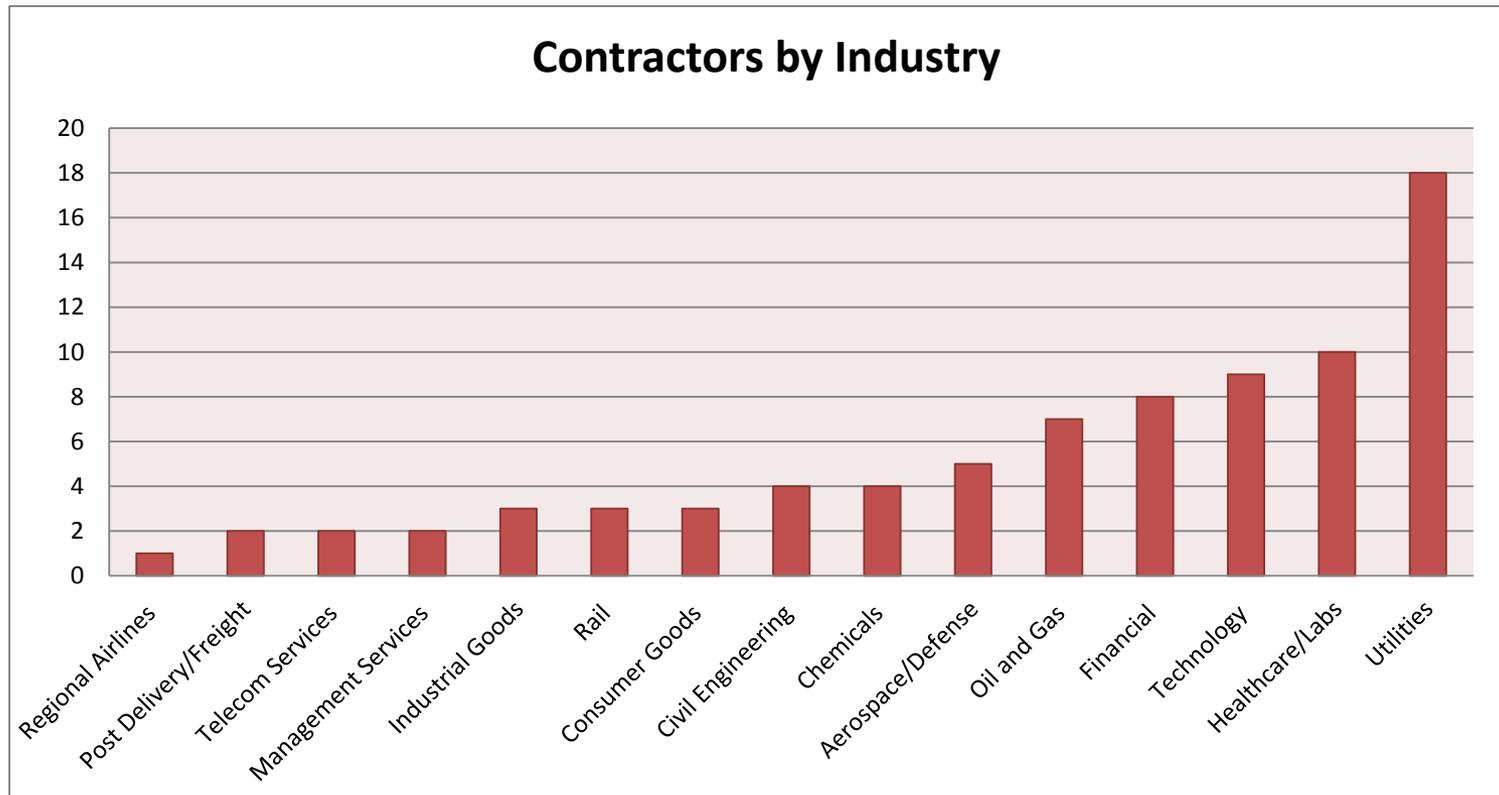


# Administration of the FAAP Program

- FAAP Branch, National Office
  - Negotiate and manage FAAP agreements
  - Schedule FAAP evaluations
    - Neutral selection system similar to FCSS
  - Coordinate FAAP evaluations
- OFCCP Regional and District Offices
  - Conduct FAAP evaluations

# FAAP Coverage

*Is FAAP right for my business?*



## Requesting a FAAP Agreement

- Written request must be submitted to the OFCCP Director
- Request must be received at least 120 calendar days prior to the expiration of current corporate headquarters AAP
- Request must be made prior to notice of commencement of a compliance evaluation
- All ongoing compliance evaluations will continue throughout the approval process

# Application Materials

- Statement of how the contractor is a covered federal contractor and a copy of a qualifying federal contract
- Consolidated EEO-1 Report
- Organizational Chart
- Description of each functional unit including the total number of employees by location
- Location of personnel records for each functional unit
- Location, contact(s), and EEO-1 number(s) for all establishments that will maintain establishment-based AAPs, if applicable
- Proposed AAP year
- Copies of organizational and unit-specific personnel policies

# FAAP Agreement Approval Process

- OFCCP will review the application package and meet with the designated company representative
- OFCCP will draft the proposed agreement and present it to the OFCCP Director for review and approval
- Upon approval by the OFCCP Director, the agreement will be forwarded to the contractor for signature
- The agreement will become effective upon the signature of the OFCCP Director

## What's different about a Functional AAP?

- No major differences
  - Required to adhere to EO 11246, Section 503 and VEVRAA
  - Required AAP elements are the same
  - Functional units cannot be reviewed for 24 months following completion of a compliance evaluation

# Advantages of FAAP

- Align AAPs with how business operates
- Assign accountability to the appropriate officials
- Tailor affirmative action and outreach to meet specific needs of the functional or business unit
- Agreement manager assigned to assist with the maintenance of your agreement



# Best Practices

- Routine updates regarding organizational changes
- Communication of goals and AAP commitments throughout the organization
- Consistent maintenance of records and routine self-audits



# Contact Information

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A background image showing a silhouette of a person running through a doorway. The person is captured in mid-stride, with their arms and legs extended. The scene is backlit, creating a bright glow around the person and casting a long shadow on the floor. The overall tone is dramatic and suggests urgency or a breakthrough.

# Questions

