

EXHIBIT J

United States Department of Labor
Office of Federal Contract Compliance Programs
Office of Federal Contract Compliance Programs (OFCCP)

OFCCP Key Personnel - National Office

| Name | Title | Division | Phone |
|--------------------------|---|--------------|----------------|
| Thomas M. Dowd | Acting Director | Front Office | (202) 693-0101 |
| Thomas M. Dowd | Deputy Director | Front Office | (202) 693-0101 |
| Donna R. Lenhoff | Senior Civil Rights Advisor | Front Office | (202) 693-0101 |
| Lisette Geán | Special Assistant to the Deputy Director | Front Office | (202) 693-0101 |
| Michael S. Jones | Director | DMAP | (202) 693-0119 |
| Candice Spalding | Deputy Director | DMAP | (202) 693-0119 |
| Marc Huete | Branch Chief for Information Technology | DMAP | (202) 693-0119 |
| Kenneth Leung | Branch Chief for Budget and Finance | DMAP | (202) 693-0119 |
| Carol Qualls | Branch Chief for Human Capital and Workforce Management | DMAP | (202) 693-0119 |
| Debra A. Carr | Director | DPPD | (202) 693-0104 |
| Harvey D. Fort | Deputy Director | DPPD | (202) 693-0104 |
| Chris Seely | Branch Chief for Regulatory, Legislative and Policy Development | DPPD | (202) 693-0104 |
| Margaret Kraak | Branch Chief for Training, Education and Program Development | DPPD | (202) 693-0104 |
| Marika Litras, Ph.D. | Director of Enforcement | ENF | (202) 693-0106 |
| Javaid Kaiser, Ph.D. | Director | DPO | (202) 693-0106 |
| Tina Williams | Deputy Director | DPO | (202) 693-0106 |
| Vacant | Branch Chief for Enforcement | DPO | (202) 693-0106 |
| Robert LaJeunesse, Ph.D. | Branch Chief for Expert Analysis | DPO | (202) 693-0106 |
| Nakisha Pugh | Branch Chief for Functional Affirmative Action Program (FAAP) | DPO | (202) 693-0106 |
| John Haymaker, Ph.D. | Branch Chief for Performance | DPO | (202) 693-0106 |
| Billy Long | Branch Chief for Quality Assurance | DPO | (202) 693-0106 |
| Theresa Lujan | Director, Indian & Native American Employment Rights Program | DPO | (602) 514-4660 |

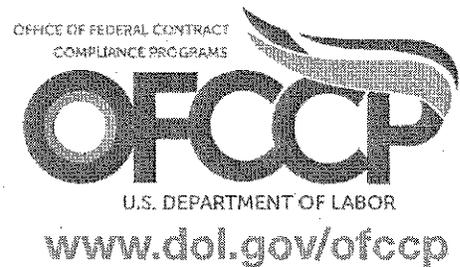
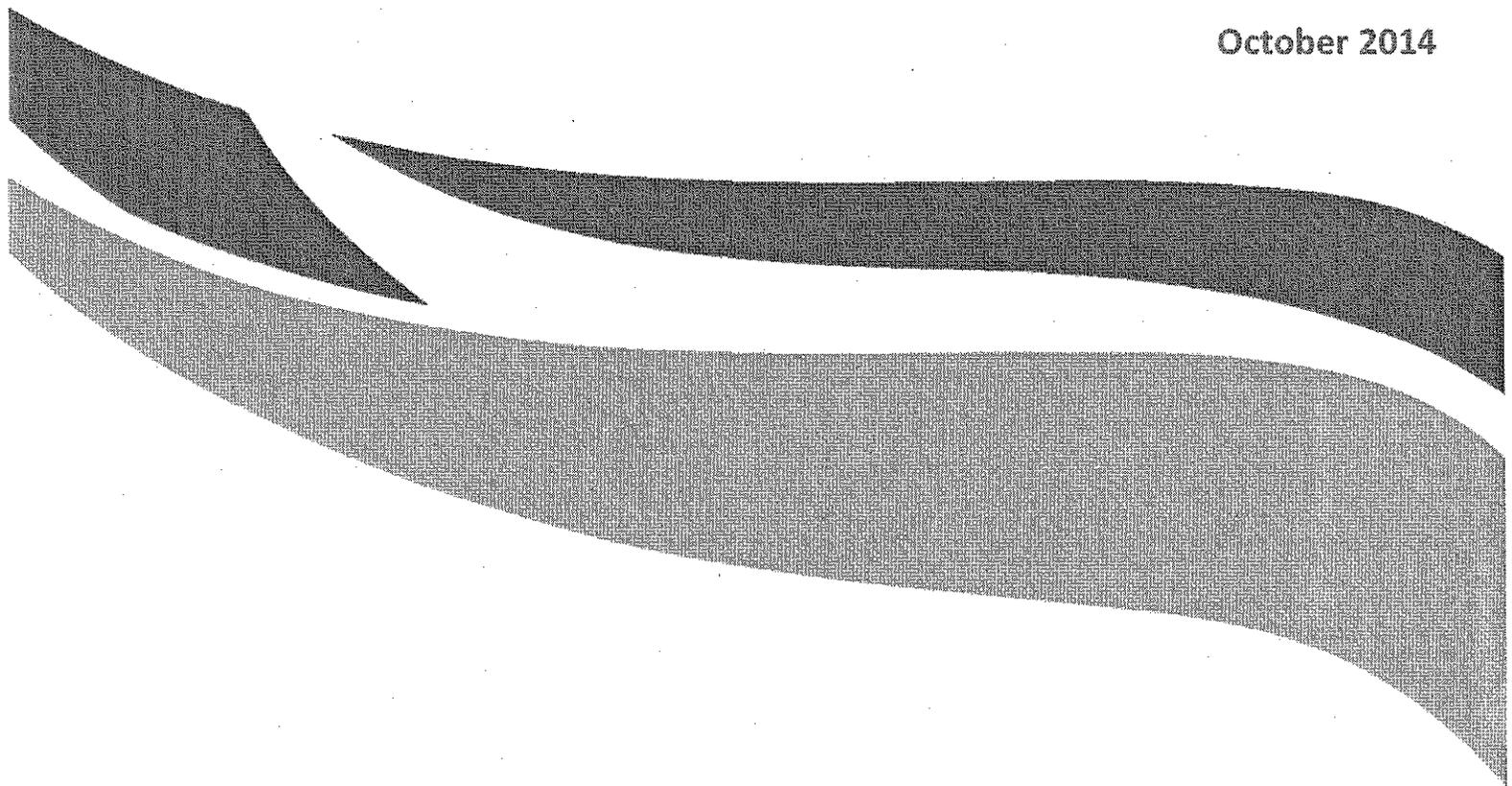
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| Theresa Lujan | Acting National Director, Mega Construction Project (MCP) Program | DPO | (602) 514-4660 |
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EXHIBIT K

Federal Contract Compliance Manual

October 2014



the CO identified for interview but did not interview, the CO will make a note in the case file as to why the interview did not take place.

- c. *Informing the Interviewee.* The CO will tell each interviewee, at the outset of a formal interview that:
- the CO will show the interviewee his or her statement containing the answers to the questions asked during the interview, and
 - the CO will ask the interviewee to sign his or her statement.

The CO will inform each interviewee that knowingly providing false or inaccurate information is unlawful and will explain that the following phrase is included in the interview notes where the interviewee signs:

"I have read the above and it is a true and accurate to the best of my knowledge."

In addition, each time the CO speaks with someone who is not a member of management he or she must inform the individual that the interview is kept confidential to the extent possible. The CO must inform all individuals, regardless of their position with the contractor, that it is unlawful for the contractor to intimidate them or take retaliatory action against them for participating in an interview.

- d. *Contractor's Presence at Interviews.* When the CO conducts onsite interviews with non-management personnel, the contractor does not have the right to have a representative present. When the CO conducts interviews with upper level managers and directors that speak for or make decisions on behalf of the company, the contractor may have an attorney or other representative present. The exception to this is when the manager is not speaking for management. An example may be when the manager is a member of a potentially affected group speaking about the potential discrimination or his or her personal experience or acting as a whistleblower.
- e. *Employee Representative Present at Interviews.* An employee may request that a personal representative, such as a union representative or legal counsel, accompany him or her during the interview. This is generally acceptable; however, the CO must discuss the presence of the representative with the interviewee privately to determine whether there may be a conflict of interest or whether the interviewee feels pressured into having the person present. If the individual wants the representative to be present the CO will note the representative's name and title on the documentation of the interview.
- COs must be aware that, in some instances, the presence of a representative may affect confidentiality or other privileges. The CO must consult with RSOL if there are any questions about the impact of the presence of a third party on confidentiality or privileges.
- f. *Formal Interviews.* After a formal interview, the CO must ask each person to read, sign and date the CO's interview notes. At the conclusion of the interview, the CO will review the questions asked and the answers given, and obtain confirmation that any direct quotes are

accurate and that all paraphrases convey the interviewee's intended meaning. The CO will promptly type the handwritten interview notes using MS Word in order to provide the interviewee with a hard copy to sign as soon as possible after the interview. The CO must enter the following phrase above the space where the interviewee will sign:

"I have read the above and it is a true and accurate to the best of my knowledge."

If the interviewee must receive a hard copy of the interview for signature later, the CO must obtain a personal mailing address from the interviewee and a contact phone number. The CO will mail the hard copy to the interviewee. If the interviewee wants corrections made, the CO must incorporate the corrections and send a hard copy of the interview to the interviewee to sign. The CO maintains records of both the original and the corrected interview in the case file. If an interviewee refuses to sign the notes, the CO will record this and the reason(s) for refusal to sign, if known.

- g. *Informal (Unplanned) Interviews.* At any point in the review process, a potential witness may approach the CO to provide information related to the review. The CO must make every effort to meet or otherwise interview the potential witness. The CO will follow the interview procedures described in this section.

If, however, the potential witness is unwilling to be interviewed and only wants to provide the information, the CO must document the conditions under which the employee provided the information. For example, the CO records that the employee provided the CO with a document, briefly describes and attaches the document to the memorandum, and indicates in the memorandum that he or she was unwilling to be interviewed. The CO must then use other means to verify the credibility of the information provided in this manner.

- h. *Location of Interviews.* The CO normally conducts interviews during the onsite review phase of the compliance evaluation. However, the CO may conduct interviews via telephone, as appropriate. There may be situations when a contractor refuses to allow onsite interviews of non-managerial employees or where such employees want their interviews conducted away from the establishment. When possible, the CO will attempt to explore alternatives with the contractor or the employee, as appropriate. One possible alternative is conducting interviews during meal breaks. Other options might include interviewing an employee onsite prior to the start of work shifts, or at the end of his or her shift. A CO may also conduct interviews at an offsite location.

- i. *Telephone Interviews.* The CO will conduct telephone interviews only when it is not feasible to conduct the interview in person, since the CO cannot observe the interviewee's demeanor during a telephone interview, making credibility determinations more difficult. However, when telephone interviews of employees or applicants are necessary, the CO must type the resulting notes and send a copy to the interviewee for review, revisions, as appropriate, and signature. The CO will ask whether there is anyone else present with the interviewee to address any concerns this may create.

2M01 MANAGEMENT INTERVIEWS