

Conciliation Agreement
Between the
U.S. Department of Labor Office of Federal Contract Compliance Programs
And
Technatomy Corporation
3877 Fairfax Ridge, Suite 205C
Fairfax, VA 22030

PART I: General Provisions

1. This Agreement is between the U.S. Department of Labor, Office of Federal Contract Compliance Programs (OFCCP), and Technatomy Corporation, 3877 Fairfax Ridge, Suite 205C, Fairfax, VA 22030.
2. The violations identified in this Agreement were found during a compliance evaluation of Technatomy Corporation (Technatomy) which began on February 28, 2019, and were specified in a Notice of Violation that was issued on November 20, 2019. OFCCP alleges that Technatomy has violated Section 503 of the Rehabilitation Act of 1973, as amended; the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212) and implementing regulations at 41 CFR Chapter 60 due to the specific violations cited in Part II below.
3. This Agreement does not constitute an admission by Technatomy of any violation of Executive Order 11246, as amended; Section 503 of the Rehabilitation Act of 1973, as amended; the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, (38 U.S.C. 4212) and the implementing regulations.
4. The provisions of this Agreement will become part of Technatomy's AAP. Subject to the performance by Technatomy of all promises and representations contained herein and in its AAP, all named violations in regard to the compliance of Technatomy with all OFCCP programs will be deemed resolved. However, Technatomy is advised that the commitments contained in this Agreement do not preclude future determinations of noncompliance based on a finding that the commitments are not sufficient to achieve compliance.
5. Technatomy agrees that OFCCP may review compliance with this Agreement. As part of this review, OFCCP may require written reports, inspect the premises, interview witnesses, and examine and copy documents, as may be relevant to the matter under investigation and pertinent to Technatomy's compliance. Technatomy shall permit access to its premises during normal business hours for these purposes.
6. Nothing herein is intended to relieve Technatomy from the obligation to comply with the requirements of Executive Order 11246, as amended; Section 503 of the Rehabilitation Act of 1973, as amended; and/or the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212); their implementing regulations; or any other equal employment statute or executive order or its implementing regulations.
7. Technatomy agrees that there will be no retaliation of any kind against any beneficiary of this Agreement or against any person who has provided information or assistance, or who files a complaint, or who participates in any manner in any proceedings under Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and/or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212).

8. This Agreement will be deemed to have been accepted by the Government on the date of the signature by the Acting Assistant District Director for OFCCP.
9. If at any time in the future, OFCCP believes that Technatomy has violated any portion of this Agreement during the term of this Agreement, Technatomy will be promptly notified of that fact in writing. This notification will include a statement of the facts and circumstances relied upon in forming that belief. In addition, the notification will provide Technatomy with 15 calendar days from receipt of the notification to respond in writing, except where OFCCP alleges that such a delay would result in irreparable injury.

Enforcement proceedings for violation of this Agreement may be initiated at any time after the 15-day period has elapsed or sooner, if irreparable injury is alleged, without issuing a Show Cause Notice.

Where OFCCP believes that Technatomy has violated this Conciliation Agreement, OFCCP may seek enforcement of this Agreement itself and shall not be required to present proof of the underlying violations resolved by this Agreement.

Liability for violation of this Agreement may subject Technatomy to sanctions set forth in 41 CFR 60-300.66 and/or 41 CFR 60-741.66, and/or other appropriate relief.

PART II: Specific Provisions

1. **VIOLATION:** During the period August 1, 2017, through September 9, 2019, Technatomy failed to immediately list all employment openings with either the state workforce agency job bank or a local employment service delivery system serving the location where the openings occurred in violation of 41 CFR 60-300.5(a)2–6.

REMEDY: On September 10, 2019, Technatomy began listing all employment openings with an appropriate employment service delivery system. Technatomy will continue to list all employment openings as they occur with an appropriate employment service delivery system (ESDS) (either the state workforce agency job bank or a local ESDS) where the openings occur, in a manner and format that will allow the ESDS to provide priority referrals of protected veterans to Technatomy, as required by 41 CFR 60-300.5(a)2–6. With its initial listing, and as subsequently needed to update the information, Technatomy will also advise the employment service delivery system that it is a federal contractor that desires priority referrals of protected veterans for job openings at all locations within the state, and provide the employment service delivery system with the name and address of each of its hiring locations within the state and the contact information for the contractor official responsible for hiring at each location, in accordance with 41 CFR 60-300.5(a)4. Should any of the information in the disclosures change since it was last reported to the ESDS, Technatomy shall provide updated information simultaneously with its next job listing.

2. **VIOLATION:** During the period August 1, 2017, through July 31, 2018, Technatomy failed to document all activities it undertook to comply with its external outreach and recruitment efforts that were reasonably designed to effectively recruit qualified individuals with disabilities; and maintain these documents for a period of three (3) years, in accordance with 41 CFR 60-741.44(f)(4).

REMEDY: Technatomy will document all activities it undertakes to comply with its external outreach and recruitment efforts that are reasonably designed to effectively recruit qualified individuals with disabilities and maintain these documents for a period of three (3) years, in accordance with 41 CFR 60-741.44(f)(4).

Part III: Reporting

1. Technatomy agrees to retain records pertinent to the violations cited in Part II above, and to the reports submitted in compliance with Paragraph 2, below. These records shall include data and information underlying the required reports, specifically, but not limited to all applications and personnel records. The records will be retained until the expiration of this Agreement or consistent with regulatory requirements, whichever is later.
2. Technatomy agrees to furnish the OFCCP with two reports to Shanae Moody, Acting Assistant District Director, Arlington District Office, at (b) (7)(C) @dol.gov:

The first report will be due on March 2, 2020, and will cover the period of August 1, 2019, through January 31, 2020, and will include the following:

- a. For Violation 1: A list of all employment openings that occurred during the reporting period to include: 1) Documentation to confirm these openings were listed with the appropriate ESDS (state workforce agency or local ESDS) where the openings occurred, in a manner and format that allows the ESDS to provide priority referrals of protected veterans to Technatomy; 2) In the first report, documentation that Technatomy advised the appropriate ESDS, with its initial listing, that it is a federal contractor that desires priority referral of protected veterans for job openings at all locations within the state; and 3) In the first report, documentation to confirm that, in its initial listing, Technatomy provided the ESDS with the name and address of each of its hiring locations within the state, and the contact information for the Technatomy official responsible for hiring at each location. Documentation of the above should include copies of the written notification(s) to the ESDS. Should any of the information in the disclosures change since it was reported to the ESDS, Technatomy shall provide updated information simultaneously with its next job listing.
- b. For Violation 1: Copies of all responses received from each employment service delivery system (ESDS) used during the report period.
- c. For Violation 2: Documentation to verify that Technatomy undertook appropriate outreach and positive recruitment activities reasonably designed to effectively recruit qualified individuals with disabilities and conducted an assessment of its efforts. This documentation should include a copy of the sections of Technatomy's AAP that list: 1) Its outreach activities with supporting documentation; and 2) An assessment of the effectiveness of each activity. Technatomy should note that 41 CFR 60-741.44(f) lists examples of several resources that may aid contractors in effectively recruiting and employing qualified individuals with disabilities.
- d. For Violation 2: Copies of all responses or other related correspondence received from each of the organizations used during the reporting period in efforts to recruit qualified individuals with disabilities.

The second report will be due on August 31, 2020, and will cover the period of February 1, 2020, through July 31, 2020, and will include the following:

- a. For Violation 1: A list of all employment openings that occurred during the reporting period to include documentation to confirm these openings were listed with the appropriate ESDS (state workforce agency or local ESDS) where the openings occurred, in a manner and format that allows the ESDS to provide priority referrals of protected veterans to Technatomy. Documentation of the above should include copies of the written notification(s) to the ESDS. Should any of the information in the disclosures change since it was reported to the ESDS, Technatomy shall provide updated information simultaneously with its next job listing.
 - b. For Violation 1: Copies of all responses received from each employment service delivery system (ESDS) used during the report period.
 - c. For Violation 2: Documentation to verify that Technatomy undertook appropriate outreach and positive recruitment activities reasonably designed to effectively recruit qualified individuals with disabilities and conducted an assessment of its efforts. This documentation should include a copy of the sections of Technatomy's AAP that list: 1) Its outreach activities with supporting documentation; 2) An assessment of the effectiveness of each activity; and 3) A copy of Technatomy's annual assessment of the totality of its outreach activities, as required by 41 CFR 60CFR60-741.44(f)(3). Technatomy should note that 41 CFR 60-741.44(f) lists examples of several resources that may aid contractors in effectively recruiting and employing qualified individuals with disabilities.
 - d. For Violation 2: Copies of all responses or other related correspondence received from each of the organizations used during the reporting period in efforts to make good faith efforts to recruit qualified individuals with disabilities.
3. This Conciliation Agreement shall remain in effect until the review and acceptance by OFCCP of Technatomy's final progress report.

PART IV: Signatures.

This Conciliation Agreement is hereby executed by and between the Office of Federal Contract Compliance Programs and Technatomy Corporation, 3877 Fairfax Ridge, Suite 205C, Fairfax, VA 22030.

(b) (6), (b) (7)(C)

Nadeem Butler
President & CEO
Technatomy Corporation
3877 Fairfax Ridge, Suite 205C
Fairfax, VA 22030

DATE: November 26, 2019

(b) (6), (b) (7)(C)

(b) (7)(C), (b) (7)(E)
Compliance Officer
Arlington District Office

DATE: 11/29/19

(b) (6), (b) (7)(C)

Shanae Moody
Acting Assistant District Director
Arlington District Office

DATE: 12/4/2019