

Conciliation Agreement
Between the
U.S. Department of Labor Office of Federal Contract Compliance Programs
and
RGS Associates Inc.
1800 S Bell Street, Suite 140
Arlington, VA 22202-3559

PART I: General Provisions

1. This Agreement is between the U.S. Department of Labor, Office of Federal Contract Compliance Programs (OFCCP), and RGS Associates Inc., 1800 S Bell, Suite 140, Arlington, VA 22202.
2. The violations identified in this Agreement were found during a compliance evaluation of RGS Associates Inc. (RGS Associates) which began on March 21, 2019, and were specified in a Notice of Violation that was issued on November 21, 2019. OFCCP alleges that RGS Associates 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 RGS Associates 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 RGS Associates' AAP. Subject to the performance by RGS Associates of all promises and representations contained herein and in its AAP, all named violations in regard to the compliance of RGS Associates with all OFCCP programs will be deemed resolved. However, RGS Associates 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. RGS Associates 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 RGS Associates' compliance. RGS Associates shall permit access to its premises during normal business hours for these purposes.
6. Nothing herein is intended to relieve RGS Associates 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. RGS Associates 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 RGS Associates has violated any portion of this Agreement during the term of this Agreement, RGS Associates 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 RGS Associates 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 RGS Associates 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 RGS Associates to sanctions set forth in Section 209 of the Executive Order, 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 October 1, 2017, through June 30, 2018, RGS Associates failed to document all activities it undertook to comply with its external outreach and recruitment efforts; and to maintain those documents for a period of three (3) years, in accordance with 41 CFR 60-300.44(f)(4).

REMEDY: On July 1, 2018, RGS Associates began to document all activities it undertakes to to identify and recruit qualified protected veterans. RGS Associates will continue to document all activities it undertakes to comply with its external outreach and recruitment efforts; and to maintain those documents for a period of three (3) years, in accordance with 41 CFR 60-300.44(f)(4).

2. **VIOLATION:** During the period October 1, 2017, through June 30, 2018, RGS Associates failed to document all activities it undertook to comply with its external outreach and recruitment efforts; and to maintain those documents for a period of three (3) years, in accordance with 41 CFR 60-741.44(f)(4).

REMEDY: On July 1, 2018, RGS Associates began to document all activities it undertakes to to identify and recruit qualified individuals with disabilities. RGS Associates will continue to document all activities it undertakes to comply with its external outreach and recruitment efforts; and to maintain those documents for a period of three (3) years, in accordance with 41 CFR 60-741.44(f)(4).

Part III: Reporting

1. RGS Associates 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. RGS Associates agrees to furnish the OFCCP with one report to Shanae Moody, Acting Assistant District Director, OFCCP – Arlington District Office, at (b) (7)(C) @dol.gov:

The report will be due on November 30, 2020, and will cover the period of October 1, 2019, through September 30, 2020.

Each report will include the following:

- a. For Violation 1: Documentation to verify that RGS Associates undertook appropriate outreach and positive recruitment activities reasonably designed to effectively recruit qualified protected veterans and conducted an assessment of its efforts. This documentation should include a copy of the sections of RGS Associates' AAP that list: 1) Its outreach activities with supporting documentation; 2) An assessment of the effectiveness of each activity; and 3) A copy of RGS Associates' annual assessment of the totality of its outreach activities, as required by 41 CFR 60-300.44(f)(3). RGS Associates should note that 41 CFR 60-300.44(f) lists examples of several resources that may aid contractors in effectively recruiting and employing qualified protected veterans.
 - b. For Violation 1: Copies of all responses or other related correspondence received from each of the organizations used during the reporting period in efforts to recruit qualified protected veterans.
 - c. For Violation 2: Documentation to verify that RGS Associates 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 RGS Associates' AAP that list: 1) Its outreach activities with supporting documentation; and, 2) An assessment of the effectiveness of each activity; and 3) A copy of RGS Associates's annual assessment of the totality of its outreach activities, as required by 41 CFR 60-741.44(f)(3). RGS Associates 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.
3. This Conciliation Agreement shall remain in effect until the review and acceptance by OFCCP of RGS Associates's final progress report.

PART IV: Signatures

This Conciliation Agreement is hereby executed by and between the Office of Federal Contract Compliance Programs and RGS Associates Inc., 1800 S Bell Street, Suite 140, Arlington, VA 22202.

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

Zannie Smith
Chief Executive Officer
RGS Associates Inc.
1800 S Bell Street, Suite 140
Arlington, VA 22202

DATE: 1/16/2020

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

(b) (7)(C), (b) (7)(E)
Compliance Officer
Arlington District Office
Mid-Atlantic Region

DATE: 1/22/2020

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

Shanae Moody
Acting Assistant District Director
Arlington District Office
Mid-Atlantic Region

DATE: 1/22/2020