OFCCP TOWN HALLS
COMPLIANCE ASSISTANCE

Questions for the Town Hall:

The facilitators will guide the discussion in the planned Town Halls. The topic focuses on contractors' experiences operationalizing OFCCP's regulatory requirements in their business environment. The first Town Hall will be in the Mid Atlantic area, covering a significant portion of the East Coast. The remaining sessions will be in the Midwest and on the West Coast.

To develop the areas of interest for the Town Halls, OFCCP identified the top two contractor violations for the previous four years. The lack of outreach and recruitment is the most frequent violation during this period, followed by failing to collect or maintain recordkeeping and support data. Thus, the majority of questions will focus on contractor outreach and recruitment, and recordkeeping obligations.

In addition to these violation-based topics, OFCCP has a general interest in the ways and methods for providing enhanced contractor compliance assistance to support their voluntary compliance with OFCCP's regulations. Therefore, several questions will be asked related to developing compliant AAPs, and tools and resources that OFCCP could provide to reduce contractor costs.

Objectives:
- Identify and define the challenges that contractors face when implementing their recruitment, recordkeeping, outreach and affirmative action obligations.
- Identify the types of resources that could support contractors' voluntary compliance activities within their business environment, and reduce their costs.
- Identify effective methodologies for developing, distributing, and otherwise promoting OFCCP's contractor compliance assistance resources.
- Identify local and regional sources of trained workers, and gain information about how OFCCP could assist contractors with making connections with these sources of job-ready workers.

Outreach and Recruitment Questions

Covered federal contractors are required to engage in outreach and recruitment under Executive Order 11246, Section 503 and VEVRAA. The purpose of outreach and recruitment is to ensure that contractors effectively recruit qualified individuals with disabilities, protected veterans, women and minorities.
   a. Who develops the outreach and recruitment strategy in your organization? What information and data is that strategy based on? How often is it reviewed or revised?
   b. What are some of the challenges faced when recruiting to fill openings?
   c. What could OFCCP do to assist with connecting to sources of labor/employees? If OFCCP provided you with recruitment/outreach assistance in the past, how do you rate it? What did you find useful and what was less useful to you?

d. What types of community groups, employment services agencies, recruiters, and sources of employees are you finding most useful? Why are they yielding results? If you used other sources, why were they not as useful?

Recordkeeping

2. Maintaining personnel activity records is required under each of the legal mandates OFCCP enforces. Contractors maintain records in order to determine whether there is any indicator of potential problem areas in recruitment, hiring, promotion or termination. This requirement is often a challenge for contractors.

a. What types of third party vendors/providers are used for human resources and pay roll data? What is your experience with making changes in their reporting to comply with your recordkeeping requirements? What time and costs are associated with complying with your recording?

b. What challenges does your organization face when maintaining records?

c. How did you use OFCCP's resources related to recordkeeping to understand the obligations?

d. What additional resources can OFCCP provide to assist you in understanding the recordkeeping requirements?

Compliance Assistance

3. OFCCP provides resources on its Web site, like factsheets, sample AAPs, data for calculating the VEVRAA benchmark, technical assistance guides, to assist contractors in understanding how to implement their responsibilities.

a. What OFCCP compliance assistance resources have you used? Did you find them useful? How could OFCCP improve the tools and resources it provides to contractors to help them meet their regulatory obligations?

b. How can OFCCP better communicate the availability of compliance assistance to contractors?

c. What obligations or requirements do you find most challenging to implement within you organization? Why is this challenging? How could OFCCP help minimize this challenge?

d. Do you face any information technology challenges as you seek to voluntarily comply with the regulations?

e. Are you using internal staff or external consultants to develop your AAPs? What support would you need to develop AAPs internally? How much time and what costs do you currently incur when developing your AAPs?