

# Office of Federal Contract Compliance Programs



## “Moving Toward Compliance” Series

# Goals and Benchmarks

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# Webinar Presenters

- Ebony Ross, Equal Opportunity Specialist, OFCCP
- Leo Lestino, Regulatory Analyst, OFCCP
- Naomi Levin, Branch Chief of Policy, OFCCP
- Suzan Chastain, Counsel, Office of the Solicitor
- Keir Bickerstaffe, Senior Attorney, Office of the Solicitor

## **“Moving Toward Compliance” Training Schedule**

- Collecting Data – Available on [OFCCP Website](#)
- Components of a New Section 503 AAP – Available on [OFCCP Website](#)
- Components of a New VEVRAA AAP – Available on [OFCCP Website](#)
- Job Listings & Contracts – Available on [OFCCP Website](#)
- Goals & Benchmarks – Today

# Training Objectives

- To enable contractors to:
  - Understand the purpose of the 7% national utilization goal under Section 503 and hiring benchmarks under VEVRAA;
  - Properly establish VEVRAA hiring benchmarks using one of two methods;
  - Properly apply the Section 503 utilization goal and the VEVRAA hiring benchmark; and
  - Take appropriate action if the goal or benchmark is not met.

## Dates to Remember

- September 24, 2013 (publication date of new regulations);
- March 24, 2014 (effective date); and
- Start date of your next Affirmative Action Program cycle.

# Part One: Section 503 Utilization Goal

## **Preliminary Information: Section 503 7 % National Utilization Goal**

- New requirement – 41 CFR 60-741.46;
- Goal that measures the representation of individuals in the contractor's workforce;
- Should be attainable by complying with all aspects of affirmative action requirements;
- Must be evaluated annually;
- Must begin complying **at start of** next AAP cycle after March 24, 2014.

## Applying the 7 % Utilization Goal

- Must be applied to **each job group in the workforce;**  
  
***Except***
- Fewer than 150 employees – may apply to EEO-1 job categories; or
- 100 or fewer employees - may apply to entire workforce.



# Sample Utilization Table: Job Group

Job Group	Total number of employees per job group	# of employees who are Individuals with Disabilities per job group	Percentage of Individuals with Disabilities per job group	7% Goal Met? (Y/N)
1	200	15	7.50%	Y
2	300	12	4.00%	N
4	160	10	6.25%	N
5	400	28	7.00%	Y
6	500	50	10.00%	Y
7	1000	85	8.50%	Y
8	800	58	7.25%	Y

## If Goal is not met...

- There is **No Sanction or Fine** for not meeting the 7% disability goal;
- Must take steps to determine if and where impediments to equal employment exists;
- Must develop and execute action-oriented programs to correct problem areas.

# Sample Identification of Problem Areas and Action-oriented Programs

Job groups where utilization goal was not met	PROBLEM AREAS (IF ANY)	ACTION – ORIENTED PROGRAMS
Job Group 2	Limited outreach and recruitment effort for officials and managers	Implement additional recruitment efforts to attract officials and managers
Job Group 4	...	...

# Office of Disability Employment Policy

## Business Strategies That Work: Employing People With Disabilities **OUTREACH & RECRUITMENT**



# Outreach and Recruitment

## 3 KEYS TO BUILDING A TALENT PIPELINE

1. A **recruitment plan** that establishes and develops strong relationships with new and diverse recruitment sources.
2. An **outreach strategy** that reflects your commitment to a workforce that includes qualified employees with disabilities.
3. **Meaningful assessment** – and a willingness to shift gears and try something new if a specific strategy isn't working.



# BUILDING THE PIPELINE: *Outreach and Recruitment*

## PUBLIC RECRUITMENT SOURCES

❖ American Job Center Network

<http://www.servicelocator.org>

❖ State Vocational Rehabilitation Agencies

[http://wdcrobcolp01.ed.gov/Programs/EROD/org\\_list.cfm?category\\_cd=SVR](http://wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_cd=SVR)

❖ *ticket to Work* Employment Networks

[www.chooseworkttw.net/resource/jsp/searchByState.jsp](http://www.chooseworkttw.net/resource/jsp/searchByState.jsp)

❖ Workforce Recruitment Program

<http://askearn.org/refdesk/Recruitment/WRP>

# **BUILDING THE PIPELINE:** *Outreach and Recruitment*

## **EDUCATIONAL INSTITUTIONS**

- ❖ **Community and Technical Colleges**
- ❖ **Public and Private Colleges and Universities**

## **NON-PROFIT ORGANIZATIONS**

- ❖ **Independent Living Centers (ILCs)**
- ❖ **Disability, Mental Health, Advocacy and Other**
- ❖ **Community-Based Organizations**

## **FOR PROFIT COMPANIES & PUBLIC/PRIVATE PARTNERSHIPS**

# BUILDING THE PIPELINE: *Outreach and Recruitment*

## OUTREACH – EFFECTIVE PRACTICES

❖ First, *commit to building an inclusive workplace culture.*

❖ Ideas:

- Establish a disability/diversity ERG or BRG
- Make it clear in company signage that you are an inclusive company welcoming of people with disabilities.
- Include disability as part of all of the company's diversity policies and activities.



# BUILDING THE PIPELINE:

## *Outreach and Recruitment*

### **OUTREACH – EFFECTIVE PRACTICES**

(Ideas cont'd.)

- Explore opportunities to establish formal arrangements or informal partnerships with recruitment sources.
- Designate a coordinator for targeted disability outreach.
- Develop and deliver training to your recruitment staff on effective ways to recruit, interview, and hire job candidates with disabilities.
- Include individuals with disabilities on company recruitment teams.
- Participate actively in internship and mentorship programs.

# BUILDING THE PIPELINE: *Outreach and Recruitment*

## **OUTREACH – EFFECTIVE PRACTICES**

(Ideas cont'd.)

- Create and use accessible online job applications, job boards, and social network tools to promote hiring initiatives and job openings.
- Participate in job/career fairs targeting veterans and other job seekers with disabilities. Explore online job fairs targeting people with disabilities.
- Commit to assessment and continuous improvement.



# BUILDING THE PIPELINE: *Outreach and Recruitment* **ADDITIONAL ODEP RESOURCES**

❖ Job Accommodation Network

[www.askjan.org](http://www.askjan.org)

❖ Employer Assistance and Resource Network (EARN)

[www.askearn.org](http://www.askearn.org)

❖ *Business Strategies That Work*

[www.dol.gov/odep/pdf/BusinessStrategiesThatWork.pdf](http://www.dol.gov/odep/pdf/BusinessStrategiesThatWork.pdf)

# Part Two: VEVRAA Hiring Benchmarks

## The Purpose of the Hiring Benchmark (41 CFR 60-300.45(a))

- A hiring benchmark creates a **quantifiable method** (i.e. yardstick) by which the contractor can measure its progress toward achieving EEO for protected veterans.
- The benchmark may be used as a tool for assessing the contractor's outreach and recruitment efforts.
- Contractors will **not** be subject to an enforcement action or found to be in violation of the regs for failing to meet the benchmark

## Establishing the Hiring Benchmark (41 CFR 60-300.45(b))

- Two methods
  - **Method 1:** Adopt the national percentage of veterans in the civilian labor force, which will be **published and updated annually on the OFCCP website.**
  - **Method 2:** Establish a benchmark by taking into account five factors in 41 CFR 60-300.45(b)(2).

# The Five-Factor Approach

- ❑ **Factor 1:** The average percentage of veterans in the civilian labor force in the State(s) where the contractor is located over the preceding three years;
- ❑ **Factor 2:** The number of veterans over the previous four quarters, who were participants in the employment service delivery system in the State where the contractor is located;
- ❑ **Factor 3:** The applicant ratio and hiring ratio for the previous year, based on the data collected pursuant to 60-300.44(k);
- ❑ **Factor 4:** The contractor's recent assessments of the effectiveness of its outreach and recruitment efforts; and
- ❑ **Factor 5:** Other factors which would tend to affect the availability of qualified protected veterans.

# Sample five-factor approach (transitional AAP, Ohio Contractor)

## HIRING BENCHMARK: 8.2%

Factor 1: Average percentage of veterans in the civilian labor force in Ohio	2012 7.87%	2013 8.03%	2014 8.72%
Factor 2: Number of participants in Ohio ESDS over the last 4 quarters	Total: 75,246		
Factor 3: Applicant and Hiring ratio in 2014 (60-300.44(k) data)	Transitional year. Incomplete applicant and hiring data.		
Factor 4: Recent assessments of the effectiveness of its outreach and recruitment efforts	Transitional year. Incomplete outreach and recruitment data – limited assessment conducted in 2014.		
Factor 5: Other factors affecting availability of qualified protected veterans	Location: Contractor's establishment is located in Dayton, 12 miles from Wright-Patterson Air Force Base.		



# Sample five-factor approach (Year 2 AAP, Ohio Contractor)

## HIRING BENCHMARK: 9%

<b>Factor 1:</b> Average percentage of veterans in the civilian labor force in Ohio	2013 <b>8.03%</b>	2014 <b>8.72%</b>	2015 <b>8.53%</b>
<b>Factor 2:</b> Number of participants in Ohio ESDS over the last 4 quarters	Total: <b>82,770</b>		
<b>Factor 3:</b> Applicant and Hiring ratio in 2014 (60-300.44(k) data)	Total no. of applicants: 832 No. of veteran applicants: 75 <b>Applicant ratio: 9%</b>		Total no. of hires: 30 No. of veterans hired: 3 Hiring ratio: <b>10%</b>
<b>Factor 4:</b> Recent assessments of the effectiveness of its outreach and recruitment efforts	Overall outreach and recruitment efforts are effective. Contractor has attracted a large pool of veteran applicants due to a combination of participation in veteran job fairs and veteran hiring from local colleges.		
<b>Factor 5:</b> Other factors affecting availability of qualified protected veterans	<b>Location:</b> Contractor's establishment is located in Dayton, 12 miles from Wright-Patterson Air Force Base. Contractor is heavily involved with Wright-Patterson Transition Program.		

# Sample five-factor approach (Year 2 AAP, New York Contractor)

## Hiring Benchmark: 5%

Factor 1: Average percentage of veterans in the civilian labor force in New York	2013 4.41%	2014 4.50%	2015 4.53%
Factor 2: Number of participants in the New York ESDS over the last 4 quarters	Total: <b>50368</b>		
Factor 3: Applicant and Hiring ratio in 2014 (60-300.44(k) data)	Total no. of applicants: 832 No. of veteran applicants: 40 <b>Applicant ratio: 4.8%</b>		Total no. of hires: 30 No. of veterans hired: 1 <b>Hiring ratio: 3.3%</b>
Factor 4: Recent assessments of the effectiveness of its outreach and recruitment efforts	Contractor is currently redesigning its outreach and recruitment strategy to increase its applicant pool of protected veterans. Contractor has historically relied on listing jobs with the ESDS as its <u>primary</u> recruitment source for veterans, but contractor will begin participating in veteran job fairs to improve outreach.		
Factor 5: Other factors affecting availability of qualified protected veterans	<b>Location:</b> The contractor's establishment is located in Buffalo, New York. There are few veterans in the local recruitment area, and there are no major military installations located nearby.		

## Application of the Benchmark

- The benchmark should be applied to the contractor's hiring in the current AAP year by **establishment.**
- Among the criteria used to assess the effectiveness of outreach and recruitment.
- Remember: **no violation for failing to meet the benchmark.**



# *U.S. Department of Labor*

## *VETS*

### *Recruitment Sourcing*

**Deputy Assistant Secretary**

**Terry Gerton**

***Veterans' Employment and  
Training Service (VETS)***



# *VETS Mission*

- We **prepare** our separating service members to transition from the military to the civilian workforce.
- We **provide** our veterans with the critical resources, expertise, and training to assist them in locating and obtaining meaningful careers.
- We **protect** the employment rights of the men and women who serve this Nation.



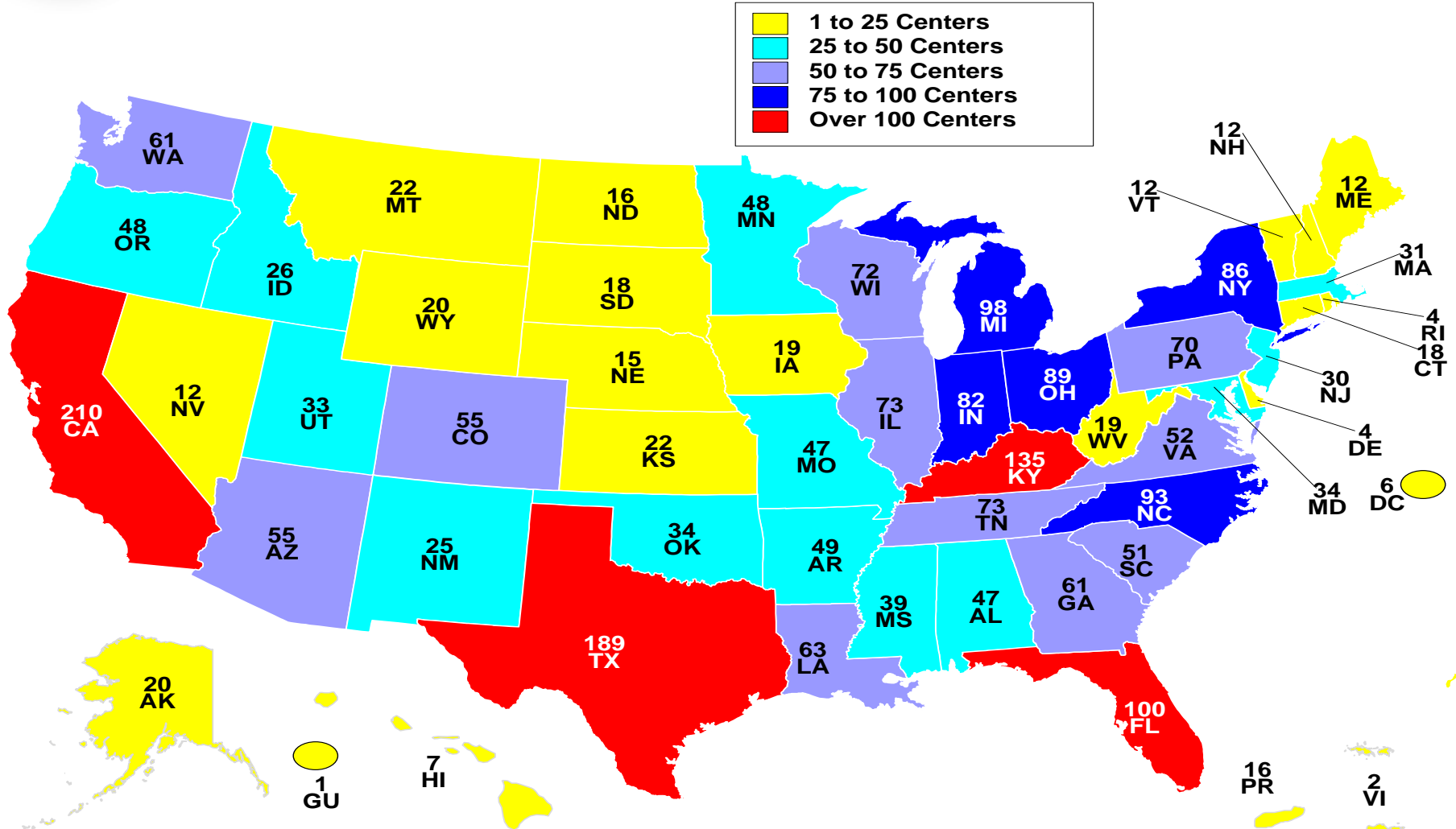
# *Funding and Oversight Overview*

- **U.S. Department of Labor**
  - Oversees the public workforce system.
- **State Agency/State Workforce Investment Board**
  - Develops a strategic vision for the state, provides leadership to the local workforce investment boards and informs local strategies.
- **Local Workforce Investment Boards**
  - Provides strategic direction to their areas and sets training priorities.
- **Local American Job Centers**
  - Serves job seekers and employers directly.
- **Service Providers**
  - Some services are provided by entities other than the American Job Centers.



# American Job Centers = 2,536

## Comprehensive = 1,707    Affiliate = 829





# *Required AJC Partners*

- Adult, Dislocated Worker, and Youth Activities under WIA
- Wagner-Peyser Employment Service
- Trade Adjustment Assistance
- Veterans Employment and Training Programs
- Unemployment Insurance
- Job Corps
- YouthBuild
- Senior Community Service Employment Program
- Migrant and Seasonal Farmworkers Employment and Training Programs
- Native American Employment and Training Programs
- Vocational Rehabilitation
- Adult Education and Literacy
- Postsecondary Vocational Education
- Community Services Block Grant





# *Serving Veterans*

- The Department of Labor has provided millions of veterans with the training, assistance and support they need to find and retain good jobs and family-supporting wages.
  - In Program Year 2012 alone, the Department of Labor served approximately 18 million participants, including 1.4 million veterans in various programs with strong outcomes.
  - During that same year, nearly 500,000 veterans who were unemployed at the time of their program participation found employment within 90 days of program completion.
  
- Priority of Service – The Jobs for Veterans Act of 2002 required DOL to provide priority of service to veterans and eligible spouses for all employment and training-funded activities funded in part or whole by DOL.



# *Jobs for Veterans State Grant Program*

- Funds are allocated to State Workforce Agencies in direct proportion to the number of veterans seeking employment within their state.
  - **Disabled Veterans Outreach Program (DVOP)** specialists provide intensive services to meet the employment needs of disabled veterans and other eligible veterans with barriers to employment.
  - **Local Veterans' Employment Representatives (LVERs)** conduct outreach to employers to increase employment opportunities for veterans.
- Many DVOPs and LVERs are located in AJCs, but are managed by the Veterans Employment and Training Service.



# DOL Jobs for Veterans State Grants

For veterans the workforce system offers 3 principal programs:

## Wagner-Peyser / Workforce Investment Act Programs (WP/WIA)

Provide employment services and training to the entire American Workforce including the majority of veterans

## Jobs For Veterans State Grants (JVSG)

The Jobs For Veterans Act says JVSG should only serve those veterans with **Significant Barriers to Employment (SBEs)\***

**DVOP**  
1100 Disabled Veterans' Outreach Program Specialists provide direct services to veterans to help overcome significant barriers to employment.

1.4 million served in PY 2012, including 450,843 referred to JVSG programs

**LVER**  
822 Local Veterans' Employment Reps conduct job development functions, build relationships with local businesses and advocate for veterans.

Core Services

Intensive Services

Training Services



# *American Job Center Job Seeker Services*

- Veterans receive priority of service at all Department of Labor employment and job-training programs, including American Job Centers (AJCs)
- Post-9/11 Era Veterans are eligible to receive Gold Card services (6 months)
- In Program Year 2012, the Department of Labor served approximately 18 million participants, including 1.4 million veterans at the 2,536 AJCs



# *American Job Center Job Seeker Services*

## ■ Core Services

- Determination of eligibility for WIA and other services
- Outreach, intake and orientation
- Initial assessment of skills, abilities, aptitudes and service needs
- Job search and placement assistance
- Provision of workforce information
- Job placement follow-up



# *American Job Center Job Seeker Services*

## ■ Intensive Services

- Comprehensive and specialized assessments of skills and service needs
- Development of individual employment plans
- Employment counseling and career planning
- Case management
- Prevocational or pre-training short-term skill development services



# *American Job Center Job Seeker Services*

- Training Services
  - Occupational skills training
  - Skill upgrading and retraining
  - On-the-job training
  - Workplace training combined with related instruction
  - Entrepreneurial training
  - Job readiness training
  - Adult education and literacy



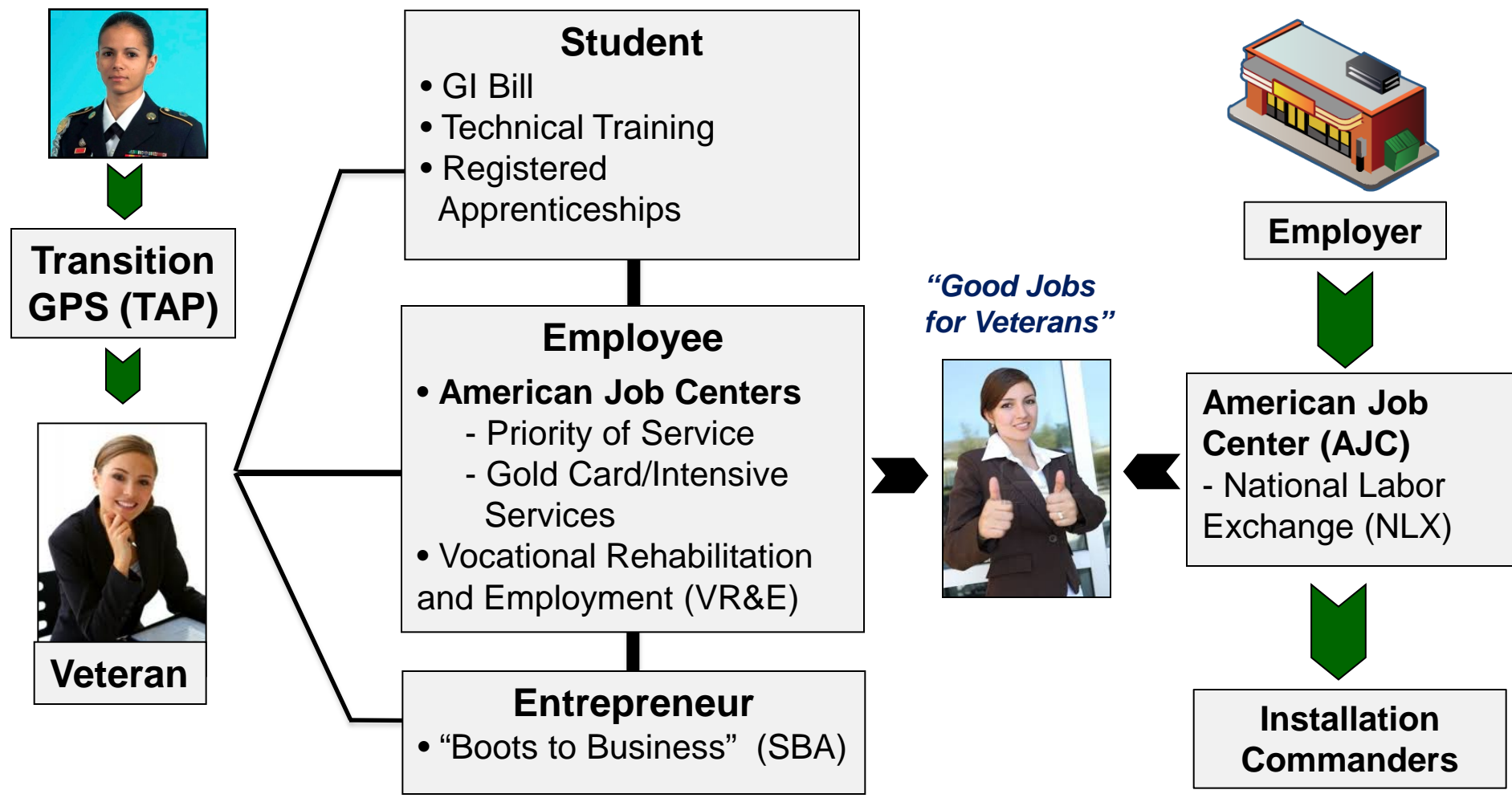
# *American Job Center Employer Services*

- Workforce information
- Job description writing
- Posting of job openings
- Reviewing applicants' resumes
- Organizing job fair
- ***In Program Year 2012, the Department of Labor served approximately 18 million participants, including 1.4 million veterans at the 2,536 AJCs***
- Skill upgrading and career ladders
- Places to conduct interviews
- Pre-screening of job applicants
- Assessment of applicants' skills
- Referral of job-ready candidate





# Transitioning Service Member (TSM) Routes





# ***DOL VETS***

## ***Contact Information***

- **Phone: 202-693-4700**
- **Veterans Electronic Tools:**
- **DOL VETS: [www.dol.gov/vets](http://www.dol.gov/vets)**
- **America's Service Locator : [www.servicelocator.org](http://www.servicelocator.org)**
- **Veterans' "Employment Center": [www.ebenefits.va.gov](http://www.ebenefits.va.gov)**
- **Career One Stop: [www.careeronestop.org](http://www.careeronestop.org)**
- **My Next Move for Veterans: [www.mynextmove.org/vets](http://www.mynextmove.org/vets)**
- **My Skills My Future: [www.myskillsmyfuture.org](http://www.myskillsmyfuture.org)**
- **America's Heroes at Work:  
[www.americasheroesatwork.gov](http://www.americasheroesatwork.gov)**

# Questions?

## Contact Information

- Contact us at 1-800-397-6251
- Division of Policy, Regulations Line 202-693-0103
- Email: [OFCCCP-Public@dol.gov](mailto:OFCCCP-Public@dol.gov)

# Resources

- OFCCP's [Web site](#)
  - Frequently Asked Questions
  - Final Rules
  - Contractor Resources
  - Fact Sheet
  - Side by Side Chart of Changes
  - Webinar Slides and Recordings
  - Webinar Registration Links
  - Press Releases