

ISSUE ALERTS

DECEMBER 2014 AFFIRMATIVE ACTION UPDATE

December 11, 2014

2015 will bring a sea of change for companies that have federal government contracts or subcontracts (contractors). The Office of Federal Contract Compliance Programs (OFCCP), the agency within the U.S. Department of Labor that enforces affirmative action and equal employment opportunity laws applicable to contractors, has issued several new sets of regulations (implementing Executive Orders) that are or will become effective in 2015. Changes include:

- New requirements, including new data collection and analysis obligations, for Affirmative Action Programs for individuals with disabilities and protected veterans.
- EEO policies must be expanded to include sexual orientation and gender identity.
- \$10.10 per hour minimum wage for construction and service contracts.
- Submission of annual pay data to OFCCP for analysis, and mandatory policies that prohibit discrimination against employees for discussing their pay (likely coming in 2015).

These and other new requirements are discussed in the Affirmative Action Update at the link below. In short, it is no longer “business as usual” for government contractors and subcontractors.