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neurological, musculoskeletal, special sense organs, respiratory (including speech disorders), cardiovascular, immune, circulatory, hemic, lymphatic, skin and endocrine; or (b) Any mental or psychological disorder (formerly termed mental retardation), organic brain syndrome, emotional or mental illness, and specific learning disabilities. It may also include inconsistent use of rejection reasons by the contractor to the detriment of applicants from particular groups, or evidence of rejected applicants' excellent qualifications, as compared to mediocre qualifications of hired applicants. Anecdotal evidence is often contrasted to statistical evidence. See also "Nonstatistical Evidence" and "Statistical Evidence." Applicant A person who has indicated an interest in being considered for hiring, promotion or other employment opportunity. This interest may be expressed in different ways, such as by completing an application or through an oral statement, depending upon the contractor's practice. An employee of a company may also be an "applicant" when he or she has indicated an interest in being considered for another job, promotion or employment opportunity within the company. See Question and Answer 15 in the Adoption of Questions and Answers to Clarify and Provide a Common Interpretation of the UGESP, available online at [◆](#) See also "Internet Applicant." Applicant Flow Data (Log) A chronological compilation of applicants (including internet applicants) for employment or promotion showing each individual, categorized by race, sex and ethnic group, who applied for each job title (or group of jobs requiring similar qualifications) during a specific period. See also "Internet Applicant." Apprenticeship (Contractor or Industry Specific) A system of agreement, written or implied, that uses practical experience to train a person in a recognized trade or craft following specified standards. For the comparable definition under VEVRAA, see 41 CFR 60-300.2(t)(1). For examples of reasonable accommodations, see 41 CFR 60-741.2(s)(2) and 41 CFR 60-300.2(t)(2). Journey Worker One who has completed an apprenticeship program or otherwise possesses the full skills and licenses of workers in his or her trade. Historically referred to as "journeyman." Labor Area The Geographic area used in calculating availability. The area may vary from local to nationwide. Construction Site The general physical location of any building, highway or other change or improvement to real property which is undergoing construction, rehabilitation, alteration, conversion, extension, demolition or repair; and any temporary location or facility at which a contractor, subcontractor, or other participating party meets a demand or performs a function relating to the contract or subcontract. 41 CFR 60-1.3 (defining "Site of construction"). Employer Identification Number (EIN) A nine-digit number assigned to a company by the Internal Revenue Service for tax and other identification purposes. Bona Fide Seniority, Merit or Incentive System An employer may lawfully compensate employees differently on the basis of a bona fide seniority, merit or incentive system. A seniority system rewards employees according to the length of their employment. A merit system rewards employees for exceptional job performance. An incentive system provides compensation on the basis of the quality or quantity of production. To be a bona fide system, it must not have been adopted with discriminatory intent, it must be based on predetermined criteria, it must have been communicated to employees, and it must have been applied consistently and even-handedly to all similarly situated employees. Business Necessity A defense used by an employer in a disparate impact case, i.e., when it uses an employment policy or practice, such as a selection criterion, that is facially neutral and consistently applied, but that excludes members of one group (e.g., women or African-Americans) at a substantially higher rate than members of other groups. Show Cause Notice (SCN) A letter from OFCCP to the contractor ordering it to provide evidence demonstrating why enforcement proceedings should not be instituted. Accommodation See "Reasonable Accommodation (Disability/Disabled Veteran)," "Reasonable Accommodation (Pregnancy)" and "Religious Accommodation." Active Duty Wartime or Campaign Badge Veteran A veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the U.S. Department of Defense. Adverse Impact An adverse impact occurs when a contractor's use of a facially neutral policy or selection procedure (e.g., a test, an interview, a degree requirement, leave or hours policy) disqualifies members of a protected class at a substantially higher rate than others. Though the terms "adverse impact" and "disparate impact" are sometimes used interchangeably, the Uniform Guidelines on Employee Selection Procedures (UGESP) outlined at 41 CFR 60-3.16B use only the term "adverse impact" and define it as a substantially different rate of selection in hiring, promotion, transferring, training or other employment decision which works to the disadvantage of the members of a race, sex or ethnic group identified in 41 CFR 60-3.4. See "Disparate Impact." Affected Class A group of people sharing common traits or characteristics (e.g., the same race, sex, or ethnicity) who are the victims of systemic discrimination by a particular contractor during a specific timeframe. Contract cancellation is one of the sanctions authorized, in appropriate cases, for violation of Executive Order 11246, Section 503 or VEVRAA. Under the regulations at 41 CFR Part 60-2, the category is called "Asian/Pacific Islander." Under the regulations at 41 CFR 60-4.3(a).d(iii), the category is called "Asian and Pacific Islander." Availability As described in 41 CFR 60-2.14, an estimate of the number of qualified minorities or women available for employment in a given job group, expressed as a percentage of all qualified people available for employment in the given job group. The purpose of the availability determination is to establish a benchmark against which the demographic composition of the contractor's incumbent workforce can be compared to determine whether barriers to equal employment opportunity may exist within particular job groups. The ASCN identifies all the unresolved or current violations. Rightful Place The position, both economically and in terms of employment status (usually job position and seniority), that the victim of discrimination would have held if the discrimination had not occurred. See "Make-Whole Relief." Section 503 Section 503 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 793. One of the three legal authorities enforced and administered by OFCCP. Section 503 applies to federal contractors with a contract or subcontract of more than \$15,000. Anecdotal Evidence Nonstatistical evidence of discrimination that can help bring "the cold numbers convincingly to life," International Brotherhood of Teamsters v. Compliance Check A compliance evaluation procedure that involves a determination of whether the contractor has maintained appropriate records consistent with the regulations at 41 CFR 60-1.12, 60-300.80 and 60-741.80. Goals for Minorities and Women, Construction Contractors (Participation Goals) Participation goals for minorities and women under Executive Order 11246, expressed as percentages of the hours worked by the contractor's aggregate workforce, by trade, in the geographic area(s) where a federal or federally assisted construction project is located. See 41 CFR 60-4.6. Goal for Qualified Individuals with Disabilities (Utilization Goal) The regulations implementing Section 503 establish a utilization goal of 7% for the employment of qualified individuals with disabilities for each job group in the contractor's workforce. Supply and service contractors use the same job groups that they use for the establishment of placement goals for minorities and women, and covered construction contractors apply the goal to the same trades they use when applying their participation goals under Executive Order 11246. Contractors with 100 or fewer employees have the option of using their entire workforce instead of job groups or trades. See 41 CFR 60-741.45. Disability-Related Question or Inquiry It is a violation of Section 503 for a contractor to ask disability-related questions of an applicant at the pre-offer stage of the employment process, and such questions may only be asked of employees if they are job-related and consistent with business necessity. See 41 CFR 60-741.23. A disability-related question or inquiry is one that is likely to elicit information about the existence, nature or extent of a disability. This includes directly asking whether an applicant has a disability, as well as asking questions that are closely related to disability, e.g., "Do you have a disability?" "Are you able to stand and walk?" and "Will you need a reasonable accommodation to perform this job?" However, an application may ask applicants, pre-offer, to inform the contractor if an accommodation is needed for the application process. As part of the contractor's affirmative action obligations, the contractor shall also invite applicants, pre- and post-offer, and employees to inform the contractor whether they believe that they are individuals with disabilities as defined in 41 CFR 60-741.2(g)(1)(i) or (ii). Recently Separated Veteran Any veteran during the three-year period beginning on the date of such veteran's discharge or released from active duty in the U.S. military, ground, naval or air service in the last three years. See 41 CFR 60-300.2(u). Victim Specific Relief See "Individual Relief." Violation Failure to fulfill a requirement of the Executive Order 11246, Section 503 or VEVRAA, or their implementing regulations. White (not Hispanic or Latino) As defined by OMB's Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (1997), an individual, not of Hispanic origin, with origins in any of the original peoples of Europe, North Africa or the Middle East. Formula Relief A method used in systemic discrimination cases for calculating a total amount of back pay for an affected class of discrimination victims that is then divided (pro rata or otherwise) among all members of that class. Compare with "Individual Relief." Fringe Benefits Benefits that an employer provides to employees in addition to paying their wages or salary. Examples include, but are not limited to: Profit-sharing and bonus plans; Leave (e.g., annual vacation days, personal days, sick leave); Stock options or awards; Medical, hospital, accident and life insurance; Long-term and short-term disability benefits; Severance benefits; Pension or other retirement benefits and early retirement incentives; and Other terms, conditions and privileges of employment. The employer must prove that a policy or practice that has an adverse impact is job-related and consistent with business necessity. Notice of Violation of a Conciliation Agreement (15-Day Notice) A letter from OFCCP informing the contractor that the agency believes the contractor has violated the terms of a Conciliation Agreement and that enforcement proceedings may be initiated unless the contractor demonstrates within 15 calendar days from its receipt of the letter that it has not violated its commitments under the agreement. Notice of Results of Investigation (NORI) A letter from OFCCP notifying the contractor of the results of a complaint investigation, including whether the agency found any violations of Executive Order 11246, Section 503 or VEVRAA. If violations were found, the NORI details those violations and invites the contractor to join the agency in resolving the complaint through conciliation. Regression Analysis A statistical analysis used to evaluate the interrelated effects of independent variables (such as education, prior experience) on a dependent variable (such as hire, compensation). Regression analyses frequently are a significant element of OFCCP's proof used in systemic discrimination cases. Make-Whole Relief Remedy for discrimination that restores the victim of discrimination to his or her rightful place, both economically and in terms of employment status, and benefits and privileges that he or she would have had had the discrimination not taken place. Common elements of make-whole relief include, but are not limited to, as appropriate to the facts of the case, reinstatement, reinstatement, back pay with interest and retroactive seniority. Notice of Violation (NOV) A letter from OFCCP notifying the contractor that the agency has found violations of Executive Order 11246, Section 503 and/or VEVRAA during a compliance evaluation, identifying the remedies that are required to resolve those violations, and inviting the contractor to engage in conciliation to resolve them. Impact Ratio Analysis (IRA) A method for identifying personnel activity that should be investigated further. The IRA is a comparison of the selection rates of different racial, ethnic and sex groups within an identified applicant or candidate pool. SSEGs are sometimes referred to as a pay analysis groups and are viewed by the agency as equivalent terms. Uniform Guidelines on Employee Selection Procedures (UGESP) Guidelines developed by the EEOC, U.S. Department of Justice, U.S. Department of Labor and the Civil Service Commission (now the Office of Personnel Management) to provide a single set of principles that are designed to assist employers, labor organizations, employment agencies, and licensing and certification boards to comply with requirements of federal law prohibiting employment practices that discriminate on grounds of race, color, religion, sex and national origin. Individual Relief The assessment of make-whole relief for identified victim(s) of discrimination on an individualized basis. This method is generally used to calculate back pay and other make-whole relief, such as reinstatement and rightful seniority, in the individual or small group discrimination cases where the victims of discrimination, and the losses they incurred, can be determined with specificity. Compare with "Formula Relief." Individual with a Disability A person with a disability, Job Area Acceptance Range (JAAR) An analytical tool used to analyze the distribution of employees in a workforce by comparing the actual percentage of minorities and women in a job area to their percentage in the relevant segment of the contractor's workforce. This report details specific information, such as the sex, race and ethnic composition of an employer's workforce by job category. This form is also known as Standard Form 100. Job Description A written statement detailing the duties of a particular job title. Enforcement This term typically refers to an administrative or judicial action to compel compliance with Executive Order 11246, Section 503 or VEVRAA and their implementing regulations, or to compel performance of a conciliation agreement or consent decree. See 45 FR 65976, 65984 and Appendix B-80, October 3, 1980. See 41 CFR 60-300.2(b). Person Any natural person, corporation, partnership, unincorporated association, state or local government; and any agency, instrumentality or subdivision of such a government. 41 CFR 60-1.3. The term also includes joint ventures under the regulations implementing VEVRAA (41 CFR 60-300.2(n)(5)) and Section 503 (41 CFR 60-741.2(k)(5)). Pattern or Practice Discrimination Discrimination resulting from a practice or acts that are repeated, routine or of a generalized nature, for example, a practice of not interviewing male applicants for positions that involve working in small spaces. Methods of proving such discrimination vary from case to case, but often include, at least in part, statistical evidence. Job Categories The 10 designated categories of the EEO-1 report: Officials and managers (divided into executive/senior level and mid/first level), Professionals, Technicians, Sales workers, Office and clerical, Craft workers (skilled), Operatives (semi-skilled), Laborers (unskilled), and Service workers. EEO-1 Report The Employer Information Report EEO-1. An annual report filed with the Joint Reporting Committee (composed of OFCCP and the Equal Employment Opportunity Commission) by certain employers, including federal contractors with 50 or more employees and a prime contractor first-tier subcontract of \$50,000 or more, subject to Executive Order 11246. Adverse actions include employment actions such as termination, demotion or failure to hire. Other actions that are likely to deter a reasonable person from pursuing their rights, including threats and unjustified negative evaluations or references, may also be adverse actions. Harassment Harassment is unwelcome conduct that is based on a protected characteristic (race, color, religion, sex, sexual orientation, gender identity, national origin, disability, status as a protected veteran, or because an individual disclosed, discussed or inquired about compensation). Harassment becomes illegal if it is so frequent or severe that it creates a hostile or offensive work environment or if it results in an adverse employment decision (such as the victim being fired or demoted). Examples of harassment include slurs, graffiti, offensive or derogatory comments, or other verbal or physical conduct. Sexual harassment may include unwelcome sexual advances, requests for sexual favors and other conduct of a sexual nature. OFCCP's regulations prohibit harassment, intimidation, threats or discrimination because the person filed a complaint, participated in an investigation or compliance evaluation, opposed discrimination or exercised a right protected by OFCCP's regulations. The FMLA is enforced by the U.S. Department of Labor's Wage and Hour Division. For example, courts have found undue hardship where the accommodation diminishes efficiency in other jobs, infringes on other employees' job rights or benefits, impairs workplace safety, or causes co-workers to carry the accommodated employee's share of potentially hazardous or burdensome work. Director The Director of the Office of Federal Contract Compliance Programs (OFCCCP). The head of OFCCP was formerly referred to as the Deputy Assistant Secretary for Federal Contract Compliance; this previous designation still appears in some OFCCP regulations. Line of Progression A series of related jobs in a promotional sequence, generally starting with lower-paying jobs with less responsibility and progressing to higher-paying jobs with greater responsibility. Often, the lower-level jobs provide required training for movement to the higher-level jobs. Facially Neutral An employment practice or policy is facially neutral if it does not reference a protected characteristic such as sex or race. Even if a contractor's policy or practice (e.g., excluding applicants from employment based on certain criminal conduct or lack of a high school degree) is facially neutral, if it disproportionately impacts individuals on a prohibited basis, it violates the law unless it is shown to be job-related and consistent with business necessity (disparate impact discrimination). Placement In this Manual, placement is often used in the context of the selection or assignment of individuals for a particular job. While no one factor will necessarily be decisive, the factors that indicate the extent to which the contractor controls the manner and means of the individual's performance of his or her work will typically be most important in the Darden analysis. The Equal Employment Opportunity Commission also relies on this test to determine whether individuals are employees for Title VII and ADA purposes. Employment Agency Any person or entity that, with or without compensation, regularly works to procure employees for a contractor or to procure for individuals opportunities to work for a contractor. Government Contract (or Federal Contract) A government contractor is an agreement or modification thereof between any contracting agency and any person for the purchase, sale or use of personal property or nonpersonal services between a contracting agency and a person. Personal property includes supplies and contracts for the use of real property (e.g., as lease arrangements), unless the contract for the use of real property itself constitutes real property (e.g., easements). Nonpersonal services include, but are not limited to: utility, construction, transportation, research, and fund depository. VEVRAA The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212). One of the three legal authorities enforced and administered by OFCCP. VEVRAA applies to federal contractors with a contract or subcontract of \$150,000 or more. However, it does not apply to federally-assisted construction contractors. VEVRAA prohibits covered federal contractors from discriminating in employment based on status as a protected veteran and requires that they take affirmative action to ensure equal employment opportunity. Federal contractors and subcontractors with 50 or more employees and a contract of \$150,000 or more have additional affirmative action obligations, that include the development of a written affirmative action program. Debarment A declaration that a contractor is ineligible for the award of future contracts. Debarment is one of the sanctions authorized, in appropriate cases, for violation of Executive Order 11246, Section 503 or VEVRAA.







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