

# OFCCP'S New Veteran/Disability Regulations Are Now In Effect. Are You Ready?

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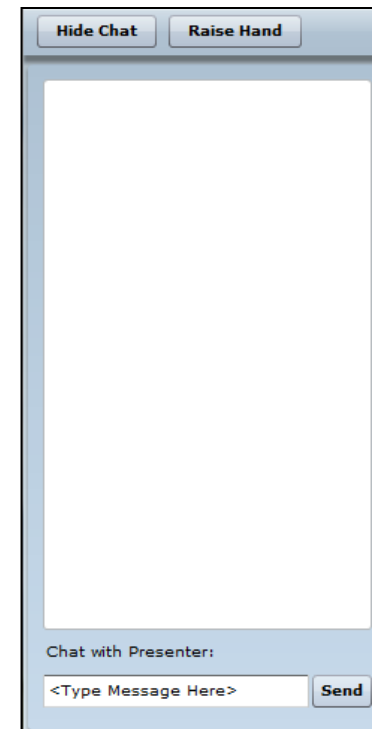
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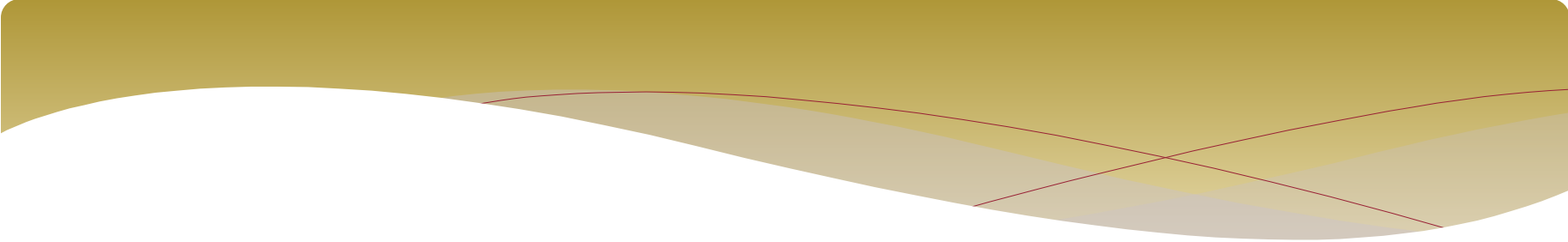
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# Introduction

The U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) last fall announced two new groundbreaking regulations implementing **Section 503 of the Federal Rehabilitation Act** (Section 503), and the **Vietnam Era Veterans Readjustment Assistance Act** (VEVRAA)

- These final rules require federal contractors and subcontractors to affirmatively recruit, hire, train, and promote covered veterans and individuals with disabilities
- The most radical changes involve newly required *utilization goals* and *benchmarks* to measure a contractors' hiring progress involving individuals with disabilities and protected veterans, and new self-identification of applicants and employees with a disability

# Topics To Be Covered

- Background on the new Veteran/Disability Regulations – *How did we get here?*
- Federal contractor & subcontractor coverage – *Who does this apply to?*
- Effective dates for changes – *Is there a ‘stay of execution’?*
- Required external & internal notices
- New self-identification of disability by applicants and employees
- New “utilization goals” and “benchmarks” and self-assessment for measuring progress in achieving them

# Background Of The New Regs

## Refocused Protection of Veterans:

- U.S. military wind-down in the Middle East (2.6 M vets)
- Influx of returning veterans to civilian job market
- Worst economy / job market in generations
- High level of unemployment for veterans
- OFCCP's April 2011 NPRM meant agency working on regs in 2009 – 2010 during height of recession
- “Pendulum Swing” from other affirmative action initiatives

# Background Of The New Regs

## Refocused Emphasis on Individuals with a Disability

- Far higher rates of unemployment and labor market participation for individuals with a disability
- Democratic administration repayment for election support
- Strengthened “voice” of disability community on heels of substantially beefed up ADAAMA in 2009
- OFCCP’s December 2011 NPRM meant agency working on new regs in 2009 – 2010 during height of recession

# Background Of The New Regs

- Federal government has often made its contractors a “test case” for changes that may not have political capital to extend to all private sector
  - Feb 2014 – new **Executive Order to raise minimum wage** to \$10.10 for new federal contracts after January 1, 2015
  - **NLRA rights poster** required since June 2010 (despite controversy, litigation and failure for private sector)
  - **E-Verify** required for many federal contractors and subcontractors, but not employers in general (unless required by state law)



# Who Is The OFCCP?

- The Office of Federal Contract Compliance Programs (OFCCP) is an agency within the U.S. Department of Labor (DOL), and is responsible for enforcing equal opportunity employment and affirmative action for employers who *contract or subcontract* with a federal government agency or the military
- Non-discrimination and affirmative action – race, color, religion, sex, national origin, protected veteran, individual with a disability
- OFCCP has been in existence since 1960s

# OFCCP Jurisdiction

- OFCCP has jurisdiction over employers if they have either —
  - **Contractor** - 50 or more employees and a direct contract for \$50,000 or more with the federal government; or
  - **Subcontractor** - 50 or more employees and a contract for \$50,000 or more with a federal contractor *and* provide goods or services that are “necessary” to the performance of the prime contractor’s federal contract
  - **Financial institutions** that are depository of federal funds or FDIC insurance. (No more OTC savings bond transactions.)
  - **Hospitals/Healthcare** - Services and revenue pursuant to: FEHBP, Medicare Advantage (Part C) and Part D (prescription drugs) are considered by OFCCP to be federal contractors (not Tricare)

# The Regs: What's New?

# New Regulation Terms

- Phase out references to 41 CFR § 60-250, and instead cite **41 CFR § 60-300**
  - OFCCP will rescind 41 CFR § 60-250 (which relates to federal contracts signed before 12/01/03)
  - V.E.T.S. has proposed to suspend use of VETS-100 Report in favor of VETS-100A and re-name it VETS-4212



# New Regulation Terms



Veterans categories:

- 4 types of “Protected Veterans” under VEVRAA:
  1. “Disabled Veteran” (formerly Special Disabled Veteran)
  2. “Active Duty Wartime or Campaign Badge Veteran” (formerly Other Protected Veteran)
  3. “Armed Forces Service Medal Veteran”
  4. “Recently Separated Veteran” (3 years - formerly 1 year)




# New Regulation Terms

- The Section 503 regulations now refer to “**Individual with a Disability**” consistent with ADA
- Section 503 definitions align with ADA in virtually all respects (*i.e.*, mental/ physical condition that substantially limits a major life activity, undue hardship, direct threat, etc.)



# The Regs: What's New?

- “Utilization Goal” for Individuals with a Disability
- “Benchmark” (goal) for Veterans
- Disclosure of Disability / Veteran Status (in addition to gender & race / ethnicity)
-  “Invitation to self-identify” for applicants and employees

# The Regs' Phase-In



# The Regs' Phase-In

- OFCCP Final Rules create phased in compliance dates throughout 2014/2015
  - Final regulations became legally effective **March 24, 2014**

March 2014						
Su	Mo	Tu	We	Th	Fr	Sa
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

# The Regs' Phase-In

- OFCCP Regs defer (grandfather) the compliance deadline for some contractors to a later date. An AAP created before March 24, 2014 may remain effective thru the end of its AAP year.
- Compliance for most (not all) new obligations must then occur at the start of contractor's *next* AAP year (but must be ready to “hit the ground running”)
- OFCCP promises “transitional year” enforcement grace period

# The Regs' Phase-In

- The Phase In, or Grandfathering Rule:
  - Under OFCCP's Final Rule the AAP of a covered federal contractor in effect before March 24, 2014 is allowed to remain in place for the duration of its AAP year (i.e., calendar year, fiscal year, etc.)
  - Grandfathering does *not* apply to Executive Order 11246 AAP (focusing on gender and race / ethnicity)

# The Regs' Phase-In

- Some of these veteran / disability obligations become effective regardless of the grandfathering provision
- **Exceptions** (March 24, 2014 triggered regardless)
  - Notice to labor unions
  - ESDS job vacancy listing
  - Veteran / Disability Rights Poster
  - EEO clause in subcontracts (vendors / suppliers)
  - Advertising “Tag Line”

# The Regs' Phase-In

- Example: A January 1, 2014 AAP for Disabled/ Protected Veterans will remain unchanged through December 31, 2014 ... even though OFCCP's new regs became legally effective on March 24, 2014.
- Contractor does NOT have to create a new AAP on March 24, 2014 to comply with the new requirements. Changes “kick-in” on January 1, 2015 for Veterans / Disabled AAP.

# What Else Is New?

**Q.** Doesn't ADA prohibit pre-employment medical inquiries into disability status?

**A.** Not according to OFCCP and EEOC

- EEOC Legal Counsel's August 8, 2013 opinion letter
  - No employer is liable for a violation of Title I of ADA for taking action required by another federal statute or regulation in the interest of affording individuals with disabilities equal or greater rights
  - Effective 3/24/14, this inquiry was required by federal (OFCCP) regulations; therefore does not violate ADA

# What Else Is New?

- EEOC's 1995 published guidance : “Enforcement Guidance: Pre-Employment Disability Related Questions and Medical Examinations”
  - If an employer is undertaking affirmative action per law (such as for tracking and government reporting purposes); or using information to benefit individuals with disabilities, is permitted to ask
  - Employer must state that information solely used in connection with affirmative action obligations, information is voluntary and will be kept confidential

# What Else Is New?

- There is no similar prohibition on *pre-offer* inquiries about Protected Veteran status under VEVRAA *as long as* the inquiry does not ask about disability
- Contractors have also never been prohibited from a *post-employment* inquiry as to Protected Veterans





# The Disability/Performance Tightrope



- OFCCP now goes far beyond the ADA as to *employees* known to be disabled AND having “significant difficulty performing his / her job.” Where it is “reasonable to conclude” that the employee’s performance failure is due to disability, Contractor must:
  - Confidentially *notify* the employee of the performance problem
  - *Inquire* whether the performance failure is related to the employee’s disability; and
  - If so, make inquiry of the employee whether s/he needs an *offered* accommodation

# The Disability/Performance Tightrope

- How far will OFCCP go in enforcement?
- Will alleged failure to inquire / failure to offer reasonable accommodation be referred to EEOC?
- Will OFCCP conclude it is “reasonable to conclude” that employer has knowledge of employee’s disability based upon a self-identification form?
- What about fact that self-ID form does not disclose exact nature of disability?
- Insulate operations management from self-ID form

# Five Veteran/Disability External Notices

# Five Needed External Notices

## Notice #1 – Labor Organizations

- Notice to labor organizations of Contractor's VEVRAA and Section 503 obligations
- Inform labor organization with which Contractor has labor agreement (CBA) that Contractor is bound by the terms of the relevant statute, and that the Contractor is committed to take affirmative action to employ and advance in employment the protected class members
- Regs do not provide any mandatory language
- *Not subject to “grandfathering” rule – effective March 24, 2014*

# Five Needed External Notices

## Notice #2 – Vendors / Suppliers

- Notification to Subcontractors (Vendors / Suppliers)
  - Contractor must send written notice of company policy related to its affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting “*appropriate action*” on their part
  - Subcontractor not required to “certify” compliance
  - Don’t confuse this “Notice” with the separate requirement to incorporate the EEO “clauses” in the company’s contracts with covered federal subcontractors (i.e., purchase order)
  - Regs do not provide any mandatory language

# Five Needed External Notices

## Notice #3 – ESDS Job Vacancy Listing

- “Listing” (not “posting”) Requirement with ESDS (job service entities) exclusively within VEVRAA regulations
  - No comparable listing requirement in Section 503 regulations
  - Most employment openings for which external candidates are considered (in whole or in part) must be “listed” with ESDS
- **Exceptions to job vacancy listing requirement:**
  - Jobs filled *exclusively* from within organization (internal progression)
  - Vacancies for executive / senior managers (FLSA “executive” OT exemption)
  - Short-term jobs lasting 3 days or less

# The New Job Vacancy Listing



- VEVRAA regulations include an explicit permission to use third party vendors for electronic job board listings / postings to help short-staffed HR departments manage the job listing process



# The New Job Vacancy Listing



- When a Contractor is required to list a job, it must also provide certain background info to ESDS (essentially a one-time notice):
  1. Label listing as from “VEVRAA Federal Contractor”
  2. Identify contact information for Contractor hiring official at each location in the state (chief hiring official, HR contact, senior manager or other manager who can verify info in job posting)



# The New Job Vacancy Listing



## Background info to ESDS (cont.)

3. Identify contact information for any outside third party job search company assisting with hiring (i.e. headhunter)
4. Label listing as a specific request for “Priority Referral” of Protected Veterans (whatever the local ESDS deems to be a “priority referral”)

# Five Needed External Notices

- Listing requirement with ESDS



Listing must be in “manner and format” the local ESDS requires

- For that reason alone, many federal contractors now list available job openings through a “clearinghouse” listing service such as JobCentral, America’s Job Exchange, eQuest
- Regs do not provide any mandatory language
- *Not subject to grandfathering rule – effective March 24, 2014*

# Five Needed External Notices

## Notice #4 – VEVRAA Pre-offer ID

- **VEVRAA Pre-Offer Self-Identification Form**
  - Contractor required to request self-identification both pre-offer and post-offer
  - Contractor may create its own VEVRAA-compliant self-identification forms for protected veterans (but only for VEVRAA - must use OFCCP's 503 Self-Identification form)

# Five Needed External Notices

- VEVRAA Self-Identification Form
  - VEVRAA Self-ID must contain certain required language
  - Company is a federal Contractor required to take affirmative action for Protected Veterans
  - Summarize relevant portions of VEVRAA and Contractor's AAP
  - Submission of information is voluntary and will have no adverse consequence on employment decision
  - Submission is confidential
  - Info will be used in manner not inconsistent with VEVRAA

# Five Needed External Notices

- Definition of each veteran category is needed on ID form so job seeker can determine if he / she is a Protected Veteran according to VEVRAA
- However, at pre-offer stage (the application process) the specific category of Protected Veteran is *not* disclosed
- Only identification is to self-designate as “Protected Veteran” or not

# Five Needed External Notices

## Notice #5 – Section 503 Pre-offer ID

- 503 (Disability) Self-Identification Form
- **Must use the OFCCP approved form**
  - OFCCP published the final approved ID Form on 1/23/14
  - OFCCP intends this form for four uses: pre-offer; post-offer; first year survey; 5 year interval survey
  - Contractor must request self-identification
    1. Pre-offer
    2. Post-offer and
    3. During employment (1<sup>st</sup> and 5<sup>th</sup>)
    4. 1 – 5 year interval reminder

# Voluntary Self-Identification of Disability

## Why are you being asked to complete this form?

Because we do business with the government, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities.<sup>i</sup> To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. Completing this form is voluntary, but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

## How do I know if I have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

- Blindness
- Deafness
- Cancer
- Diabetes
- Epilepsy
- Autism
- Cerebral palsy
- HIV/AIDS
- Schizophrenia
- Muscular dystrophy
- Bipolar disorder
- Major depression
- Multiple sclerosis (MS)
- Missing limbs or partially missing limbs
- Post-traumatic stress disorder (PTSD)
- Obsessive compulsive disorder
- Impairments requiring the use of a wheelchair
- Intellectual disability (previously called mental retardation)

**Please check one of the boxes below:**

- YES, I HAVE A DISABILITY (or previously had a disability)
- NO, I DON'T HAVE A DISABILITY
- I DON'T WISH TO ANSWER

\_\_\_\_\_  
Your Name

\_\_\_\_\_  
Today's Date



## Voluntary Self-Identification of Disability

Form CC-305  
OMB Control Number 1250-0005  
Expires 1/31/2017  
Page 2 of 2

### Reasonable Accommodation Notice

Federal law requires employers to provide reasonable accommodation to qualified individuals with disabilities. Please tell us if you require a reasonable accommodation to apply for a job or to perform your job. Examples of reasonable accommodation include making a change to the application process or work procedures, providing documents in an alternate format, using a sign language interpreter, or using specialized equipment.

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<sup>i</sup> Section 503 of the Rehabilitation Act of 1973, as amended. For more information about this form or the equal employment obligations of Federal contractors, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at [www.dol.gov/ofccp](http://www.dol.gov/ofccp).

**PUBLIC BURDEN STATEMENT:** According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about 5 minutes to complete.



# Applicant Disability Self-ID Form

- Greater risk exposure may be a general discrimination law failure to hire claim, not OFCCP technical compliance violation
- Employers need to be able to produce evidence that decision-makers were unaware of applicant's self-ID form disability disclosure
- Need to insulate from applicant self-ID anyone involved in screening, selection and hiring: hiring managers, talent acquisition members, HR administrators, and HR clerical members involved in screening applicants

# Five Veteran/Disability Internal Notices

# Five Internal Notices Needed

## Notice #1 – VEVRAA/SECTION 503 Poster

- Posting of Rights for Protected Veterans and Individuals with a Disability
  - Notice must state the rights of applicants and employees, as well as the contractor's obligation under the law to take affirmative action to employ and advance in employment qualified employees and applicants
  - Per OFCCP, this is the “**EEO Is The Law**” poster with dual EEOC and OFCCP rights described
    - OFCCP informally announced that “EEO Is The Law” poster will eventually be updated
    - *Not subject to “grandfathering” rule – effective March 24, 2014*

# Five Internal Notices Needed

- VEVRAA/SECTION 503 Poster (cont.)
  - Remote employees
    - Electronic format (email, intranet) acceptable provided:
      - Contractor provides computers to employee to access the posting, or
      - Contractor has “actual knowledge” employee may otherwise be able to access the electronic notice
    - Contractor *must* use electronic posting for job seekers if contractor uses electronic application process



# Five Internal Notices Needed

## Notice #2 – VEVRAA/SECTION 503 AAP Available For Employee Review

- Notice that AAP is available for review by Applicants / Employees
  - Full Veteran/Disability AAP (without the statistical charts) must be made available “upon request” to employee / applicant (does not apply to E.O. 11246 AAP)
  - Contractor may provide electronic access to AAP if requestor is able to access the electronic version
  - Regs do not provide any mandatory language

# Five Internal Notices Needed

## Notice #3 – VEVRAA Post-offer ID

- **VEVRAA Post-Offer Self-Identification Form**
  - Contractor required to request self-identification both *pre-offer* and *post-offer*
  - At this stage employee invited to identify the specific category of protected veteran
  - Contractor may create its own VEVRAA-compliant self-identification forms for protected veterans (but only for VEVRAA - must use OFCCP's 503 Self-Identification form)

# Five Internal Notices Needed

## Notice #4 – SECTION 503 Post-offer ID

- 503 (Disability) Self-Identification Form
  - **Must use the OFCCP approved form**
  - OFCCP published the approved ID form on 1/23/14
  - OFCCP intends this same form for four uses: pre-offer; post-offer; first survey; 5 year interval survey
  - Contractor must request self-identification
    1. Pre-offer
    2. Post-offer and
    3. During employment
    4. 1 – 5 year interval reminder

# Five Internal Notices Needed

- 503 (Disability) Self-Identification Form
- Contractor must maintain pre-offer and post-offer inquiry responses in separate “Data Analysis File”
  - Not in Employee’s personnel file
  - Not in ADA / medical file





# Five Internal Notices Needed

## Notice #5 – AAP Policy Statement

- For posting on bulletin boards and inclusion as Policy Statement in Veterans / Disabled AAP
- VEVRAA/503 Policy Statement must “indicate the *top United States executive’s* (such as the Chief Executive Officer or the President of the United States division of a foreign company) support for the contractor’s affirmative action program.”
- Not merely management official at the site / location
- Usually indicated by a EEO / AAP policy “sign-off”
- Regs do not provide any mandatory language (your current EEO Policy will do)



# Updated “Tag Lines”

- No length issue with electronic postings (since not based on cost per character or line)
  - As a practical matter, contractor must only decide this issue as to print media
  - OFCCP’s interpretation of the new rules clarify that the tagline must specifically mention veterans and the disabled, and those terms must not be abbreviated (in OFCCP view “Vet” and “disabled” are the preferred identifiers)
  - *Not subject to grandfathering rule – effective March 24, 2014*

# Updated “Tag Lines”

## SAMPLE ADVERTISING TAG LINES

### Sample tagline for internet / online advertisements

[Company] is an equal opportunity employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, age, status as a protected veteran, or status as a qualified individual with disability.

### Sample print media taglines

EEO Employer/Vet/Disability

EOE Employer M/F/Vet/Disability

EOE Employer Female/Minority/Vet/Disability




# New EEO Clauses

- **VEVRAA:** Included in subcontracts with vendors & suppliers (12 lengthy paragraphs about contractor's / subcontractor's EEO and affirmative action obligations)
- **Section 503:** Included in subcontracts with vendors & suppliers (7 lengthy paragraphs about contractor's / subcontractor's EEO and affirmative action obligations)
- *Not subject to grandfathering rule – effective March 24, 2014*

# New EEO Clauses

- Contractor must incorporate the 12 EEO Clauses of VEVRAA and the 7 EEO Clauses of Section 503 in all covered federal subcontractor agreements (*i.e.*, purchase order form, lease, supplier agreement, etc.)
- Contractor may, in its discretion, incorporate these EEO clauses by reference into its covered federal subcontracts

 When incorporating by reference, *OFCCP now mandates specific incorporation by reference language* and requires that the language appear in **bold font** (essentially a single paragraph)

# New EEO Clauses

- EEO Clauses:
  - Contractor may add a “disclaimer” phrase to the required EEO clauses (whether set forth in full or incorporated by reference) to note that these clauses in the company’s contract applies to a *federal* subcontractor, **“where applicable” or “if applicable.”**
- Too confusing to have two forms of subcontract/ purchase order: (1) version for vendors / suppliers which are *not* a federal subcontractor; and (2) version for covered federal subcontractors. Otherwise, company would have to determine which form applies, on a vendor-by-vendor basis, usually by untrained sales, purchasing or finance staff.

# The New Veteran/Disability Goals



## VEVRAA/Section 503 Goals

- **“Benchmarks”** for hiring for protected veterans:
  - Benchmark for workforce in each AAP/establishment as a whole. Established benchmark of 8% for 2014 (more recently revised by DOL to 7.2%) or can be calculated by contractor using variety of veteran workforce data
- **“Utilization Goals”** for hiring individuals with a disability:
  - 7% for each **Job Group** - or -
  - 7% for workforce in each **establishment** if the company employs 100 or fewer employees
  - Deemed to be an “aspirational goal” by OFCCP

# New Self-Assessments



## Evaluation of Personnel Processes

- “The Contractor shall periodically review such processes and make any necessary modifications to ensure that these obligations are carried out”
- Suggestions for review:
  - Document the **vacancies, promotions** and **training** for which the contractor considered the individual
  - Document the articulated legitimate non-discriminatory reasons for each vacancy, promotion or training for which the contractor **rejected** the applicant
  - Describe and document all disability accommodations undertaken, if any



# New Self-Assessments



## Evaluation of Outreach and Recruitment

- Annual evaluation of effectiveness of outreach efforts
  - Test: (according to OFCCP) Is the *totality* of contractor's efforts "effective" in identifying and recruiting qualified protected veterans (and individuals with disabilities)
- Must identify criteria used to determine effectiveness
  - Must include among criteria at least the "data metrics" for current year and for two most recent years (as self-identification data is received – 2014, 2015, 2016, etc.)

# New Self-Assessments



## Data Metrics Analysis

- Annual calculation of applicants, job openings, jobs filled, qualified applicants with disabilities, qualified protected veterans, and number of qualified protected veterans and individuals with disabilities hired
- Record retention = generally *three* (3) years

# Veterans Recruitment/Outreach Resources

- U.S. Department of Labor Veterans' Employment and Training Service (VETS) [[dol.gov/vets](http://dol.gov/vets)]
- Hero to Hired [[H2H.jobs](http://H2H.jobs)]
- America's Heroes at Work: A Step-by-Step Toolkit for Employers [[americasheroesatwork.gov](http://americasheroesatwork.gov)]
- Recruit Military [[recruitmilitary.com](http://recruitmilitary.com)]
- Veteran Career Network [[Military.com](http://Military.com)]
- VetsFirst Disabled Veterans Employment Guide [[vetsfirst.org](http://vetsfirst.org)]
- Women Veterans' Employment: Skills Matter [[dol.gov/womenveterans](http://dol.gov/womenveterans)]
- National Resource Directory – Connecting Wounded Warriors, Service Members, Veterans, Their Families and Caregivers with Those who Support Them [[nrd.gov/home/veterans\\_job\\_bank](http://nrd.gov/home/veterans_job_bank)]

# Veterans Recruitment/Outreach Resources

- Paralyzed Veterans of America [[pva.org](http://pva.org)]
- U.S. Department of Defense Transition Assistance Program (TAP)
- Michigan Works! – Job Service Agency [[michiganworks.org](http://michiganworks.org)]
- Veterans' Counselors, Advisors and Coordinators at Colleges/Universities
- Hire Heroes USA [[hireheroesusa.org](http://hireheroesusa.org)]
- Employers Military Hire [[employers.militaryhire.com](http://employers.militaryhire.com)]
- Vet Jobs [[vetjobs.com](http://vetjobs.com)]
- Veterans Enterprise [[veteransenterprise.com](http://veteransenterprise.com)]
- Hire Vets First [[hirevetsfirst.gov](http://hirevetsfirst.gov)]
- America's Service Locator [[servicelocator.org](http://servicelocator.org)]
- Career One Stop [[careeronestop.org](http://careeronestop.org)]
- My Next Move for Veterans [[mynextmove.org/vets](http://mynextmove.org/vets)]
- My Skills My Future [[myskillsmyfuture.org](http://myskillsmyfuture.org)]

# Disability Recruitment/Outreach Resources

- Michigan Vocational Rehabilitation Service agency
- U.S. Department of Labor Veterans' Employment and Training Service (VETS) [[dol.gov/vets](http://dol.gov/vets)]
- Center for Independent Living
- VetsFirst Disabled Veterans Employment Guide [[vetsfirst.org](http://vetsfirst.org)]
- National Resource Directory – Connecting Wounded Warriors, Service Members, Veterans, Their Families and Caregivers with Those who Support Them [[nrd.gov/home/veterans\\_job\\_bank](http://nrd.gov/home/veterans_job_bank)]
- Paralyzed Veterans of America [[pva.org](http://pva.org)]
- U.S. Social Security Administration Ticket to Work Employment Network Directory
- Career Opportunities for Students with Disabilities (COSD) [[cosdonline.org/cosd-career-gateway](http://cosdonline.org/cosd-career-gateway)]
- National Federation for the Blind (NFB) [[blindscience.org/careers](http://blindscience.org/careers)]

# Disability Recruitment/Outreach Resources

- Autistic Self Advocacy Network (ASAN) [[autisticadvocacy.org](http://autisticadvocacy.org)]
- Employer Assistance and Resource Network (EARN) [[askearn.org](http://askearn.org)]
- Employment One-Stop Career Center
- American Job Center
- Job Accommodation Network (JAN) [[askjan.org](http://askjan.org)] [[jan.wvueduEmployer](http://jan.wvueduEmployer)]
- ADA Affirmative Disability Action [[abilityjobs.com](http://abilityjobs.com)]
- Careers and Community for People with Disabilities [[gettinghired.com](http://gettinghired.com)]
- Goodwill Industries
- Kandu Industries [[kanduinc.org](http://kanduinc.org)]
- Office of Disability Employment Policy  
[[dol.gov/ofccp/regs/compliance/resources-recruit-disability.htm](http://dol.gov/ofccp/regs/compliance/resources-recruit-disability.htm)]
- American Job Center Network [[servicelocator.org](http://servicelocator.org)]
- Business Strategies That Work  
[[dol.gov/odep/pdf/BusinessStrategiesThatWork.pdf](http://dol.gov/odep/pdf/BusinessStrategiesThatWork.pdf)]



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