



Quarterly Meeting Minutes
Thursday, February 16, 2023
11:00am – 2:00pm

Welcome and opening remarks began with Tracey Hamilton, PILG Chair.

Jo Bennett, Treasurer discussed the opportunity for PILG sponsorship. The PILG Board explored sponsorships to help absorb administrative costs with an outside professional organization who helps with the website, membership listing, bank account, etc. and as we consider hosting in-person meetings, the Board can consider the costs to consider for those events.

There are (2) levels of sponsorship. Liberty ILG is a 501C 6-nonprofit – sponsorship donations are not tax deductible as a charitable contribution.

- \$100 – annual – organization logo with hyperlink on website and recognition at quarterly meetings
- \$250 – annual - organization logo with hyperlink on website and recognition at quarterly meetings and a hyperlink to the organizations career page/center

Missy Thomas, Vice-Chair announced an upcoming lunch-and learn, pop-up session on 3/21/23 from Noon-1:00pm. Alissa A. Horvitz, Member Attorney for Roffman Horvitz, will be presenting to the group on the topic: “Developing Meaningful Action-Oriented Programs and Documenting them.” Additional details to come.

Before moving to the balance of the agenda, Chair Hamilton reminded members to save the date for the remainder of the quarterly meetings and that more information will be provided closer to those dates: Q2-5/18, Q3-8/17, and Q4-11/16. The Q2 meeting on 5/18/23 will be in-person, 9am-12noon. Location to be determined.

Chair Hamilton introduced Ornella Castman, Chair of the Mid-Atlantic ILG. Ms. Castman informed the members about the national ILG, when it was formed, and what they are doing and where to find webinars. Ms. Castman reviewed the 2023 activities for the NILG and discussed the recent survey NILG conducted for the proposed scheduling letter and those comments are published on the website. Castman reminded members of the national conference is open for registration and early bird registration ends 5/19. The agenda is posted and is packed full of topics and presentations.

Chair Hamilton introduced Edward J. Rogers, OFCCP Philadelphia District Director. District Director Rogers, toggled through links on the OFCCP website. Items discussed were:

- New CSAL list has been published 1/20/23 – ~500 contractors and subcontractors were included.
- Review will start once the establishment receives the scheduling letter.
- OFCCP is finalizing the FY 2022, before moving to scheduling the FY 2023 list.
- New compliance officers is allowing OFCCP to go through the cases more quickly and they have all been trained with the same framework to ensure consistency in reviews.
- Take advantage of the resources for compliance assistance programs that are free, such as; the technical sustenance guide, record keeping guide, and go to the contractor compliance institute for all the different classes that are offered.
- Reminder to review the events listing and there are some events that are coming up for the Philadelphia area that may be of interest.
- Know your rights poster should be displayed and it replaces the EEO is the law poster. This is a required poster that needs to be predominately displayed.
- Visit the contractor portal, review the FAQ's, how to video's and be prepared, if you have not been in it.
- Enforcement data for the first (2) quarters: Q1 – closed 222 compliance evaluations, failed 3 discrimination cases, recovered over 1.1m in financial remedies for over 2200 effected class members, Q2 completed 205 compliance evaluations, failed 2 discrimination cases, settled 2 discrimination cases and recovered over 130,000 in backpay.
- Links and upcoming events are listed below, at the bottom of document.

Chair Hamilton introduced EEOC's Tonya Lennox, Outreach & Education Coordinator. Ms. Lennox shared:

- EEOC has been working with the Department of Labor on the hiring initiatives and strategic plan to advance diversity, inclusion and accessibility, since kick off in 2021. One part of that is the use of artificial intelligence and the algorithms used to do that and do those algorithms present discrimination barriers in the technologies.
- EEOC has participated in (4) round table discussions; 1-the hiring initiative, 2-race and equity and gaps in employment in the workplace. It has been recognized that women, since Covid, have been affected due to resigning to stay home to help or monitor children's education. 3-skill based hiring and less focus on college degrees and want employers to look at experience and skills. It is encouraged, that employers should review their job requirements and review if those degree requirements because there are a lot of individuals being looked over who have the knowledge and skills to perform those jobs. The 4th round table was artificial intelligence (AI). Tonya shared a link that discussed the EEOC hearing of potential benefits and harms of AI in employment decisions.
- Tonya pointed out the EEOC's website and directed members to the newsroom section. Links shared and reviewed are listed below, at the bottom of document.

Chair Hamilton introduced the presenters for the day from DCI Consulting Group, Evan Szarenski and Cassie Alfheim. The topic of the presentation was Employment Best Practices (That You Probably Forgot About). Below are highlights of the discussion and the full presentation is attached.

- DCI is a data driven, client-focused organization
- Developing GFE's outreach efforts that are specific to minorities, females, protected veterans, and persons with disabilities. Be specific in the outreach to those targeted areas.
- Tracking efforts will help assess the activities and evaluate what sources are attracting the candidates and determine if those sources are effectively bringing in pool of qualified applicant of a protected class, or review different recruitment sources
- The importance of applicant dispositions. They are used to determine who was considered and met the qualifications for a specific position. It is used to determine at what step of the process a candidate fell out of consideration and why. It also indicates, who withdrew from consideration and will not be included in the analysis of applicants, based on the OFCCP definition of who is an applicant.
- Tips for applicant data to prepare clean data for analysis include avoiding mass disposition and specific and consistent disposition status'
- Accommodation needs for applicants can assistance in navigating the careers website, accessibility consideration for interviews. Types of religious considerations, such as flexible scheduling around prayer or observances. The importance of a centralized accommodation tracking for accommodation requests.
- During the presentation the additional areas covered were, equal pay act, conducting pay analysis, executive order 11246, best practices for pay adjustments

Vice Chair Thomas moved to the last session of the day by introducing Matt Camardella, Principal Jackson Lewis P.C. to discuss legal updates and proposed changes to the OFCCP scheduling letter. Below are highlights on the discussion:

- Scheduling letter and the supplemental Itemized Listing is a tool used by OFCCP to initiate compliance reviews.
- Current scheduling letter authorization expires on April 30, 2023.
- Proposed modifications include a number of additions to the itemized listing.
- OFCCP is trying to collect more information at the initial submission stage of the compliance review.
- If approved as proposed, the modifications will significantly increase the burden associated with responding to the Scheduling Letter and itemized listing.
- Overview of proposed modifications include campus-like settings, compensation data, promotions and terminations data, employment policies and practices, and evaluation and assessments.
- OFCCP Estimates:
 - Proposed Scheduling Letter –39 Hours
 - Current Scheduling Letter –28 hours (also an underestimation)
 - Some surveys of contractors estimate 100 or more hours to respond to the proposed scheduling letter

- OFCCP not proposing to provide contractors with any more time to respond –still 30 days!

Meeting concluded at 2:00pm.

PILG Q1 Meeting Links Shared by Presenters

Below are the links shared by Tonya Lennox from EEOC:

<https://www.eeoc.gov/newsroom/eeoc-hearing-explores-potential-benefits-and-harms-artificial-intelligence-and-other>

Commissionmeetingcomments@eeoc.gov

Below are the links and upcoming events shared by Ed Rogers from OFCCP:

- [Corporate Scheduling Announcement List](#) (CSAL) for supply & service contractors
 - Know Your Rights poster
 - Advancing Pay Equity Through Compensation Analysis Directive, or [DIR 2022-01 Revision 1](#)
 - Check out OFCCP's [best practices, successful engagement tools, and diversity and inclusion resources](#)
 - DOL Event Calendar at <https://www.dol.gov/events>
 - [OFCCP's virtual compliance assistance events](#)
 - Philadelphia District Office Upcoming Compliance Assistance Events:
 - Tuesday, February 28, 2023, at 9:00 a.m.
 - Wednesday, March 1, 2023, at 2:00 p.m.
 - Tuesday, March 7, 2023, at 1:00 p.m.
 - Thursday, March 9, 2023, at 9:00 a.m.
- Please reach out to Assistant District Director Tracey Reid at reid.tracey.d@dol.gov to register to attend.