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American Staffing Association

Affirmative Action in the Workplace—What Staffing Firms Need to Know

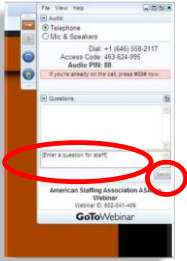
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Your Presenter Today



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Agenda: Affirmative Action Compliance at the Federal Level

- Legal obligations and best practices
 - Affirmative Action basics
 - Office of Federal Contract Compliance (OFCCP) audits and how to prepare
 - Special issues for staffing firms

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Basics of Affirmative Action

- Federal contractors and subcontractors are subject to the following laws enforced by the Department of Labor (OFCCP):
 - Executive Order 11246 prohibits discrimination in employment on the basis of race, color, religion, national origin or sex.
 - Section 503 of the Rehabilitation Act prohibits discrimination against applicants or employees with mental or physical disabilities.
 - Section 4212 of VEVRAA, as amended by the Veterans Employment Opportunities Act of 1998 and the Jobs for Veterans Act of 2002 (JFVA), prohibits discrimination against disabled veterans, veterans of the Vietnam era, recently separated veterans, other protected veterans, and armed forces service medal veterans.

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Two Prongs of Affirmative Action

- **Obligation not to discriminate against any employee or applicant for employment because of race, color, religion, sex, national origin, disabled veteran, veteran of the Vietnam era, other covered veteran status, or physical or mental disability**
- **Obligation to take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to the above protected categories**

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What Affirmative Action Is Not

- **A commitment to place unqualified minorities and women in the workforce**
- **An action that discriminates against individuals by providing preferential treatment to minorities or women**
- **Note: Quotas are expressly prohibited under Executive Order 11246 and the DOL Regulations**

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Who Is a Government Contractor?

- **“Contractor” includes any prime contractor or subcontractor.**
- **A “subcontractor” is defined as any person entering into an agreement or arrangement with a contractor to furnish supplies or services or for the use of real or personal property (including lease arrangements):**
 - Which are necessary to the performance of any government contract; or
 - Under which any part of the contractor’s obligation under a government contract is performed.

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Related Companies

- An organization having no federal contracts/subcontracts itself may be considered a federal contractor/subcontractor if it is closely related to an entity that is a contractor/subcontractor (for example a parent/subsidiary).

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Related Companies, Cont'd

- The OFCCP considers the following factors to determine whether two organizations are a single entity or independently operated corporate affiliates:
 - Common ownership
 - Common directors/officers
 - Exercise of control by one entity over the other
 - Unity of personnel policies emanating from a common source
 - Interdependency of operations

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Thresholds for Coverage

- **Basic Affirmative Action obligations - \$10,000 of contracts (aggregated)**
 - Equal Opportunity Clause, tag lines, notification to vendors and unions, posting requirements, record retention (including internet applicant records), solicit race & gender information from applicants, permit access to property
- **Affirmative Action Programs (AAPs)**
 - EO 11246—\$50,000 contract, fifty employees (or a bank that is a federal depository or issuer of savings bonds)
 - Section 503 (Disability)—same
 - VEVRAA (Veterans)—\$100,000 contract and fifty employees

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What is an Affirmative Action Plan (AAP)?

- An AAP is “a set of specific and result-oriented procedures to which a contractor commits itself to apply every good faith effort ... to achieve prompt and full utilization of minorities and women, at all levels and all segments of his work force where deficiencies exist.” 41 C.F.R. § 60-2.10
- Two AAPs Required
 - Minorities and Females
 - Individuals with Disabilities and Veterans

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How Do We Implement Our AAP?

- Measure baseline
- Identify goals for women and minorities by job group
- Communicate goals within the company
- Develop action plans that contain specific good faith efforts that will help achieve the goals, e.g. outreach

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How Do We Implement Our AAP? Cont'd

- Annually analyze hire, promotion and termination activity for potential findings of adverse impact
- Maintain accurate and complete record-keeping procedures

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What is Included in an AAP?

- **Narrative Components**
 - Responsibility for implementation
 - How the AAP is audited and monitored
 - Identification of problem areas
 - Action oriented programs to increase utilization

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What is Included in an AAP?

- **Statistical analyses**
 - Workforce analysis
 - Job group analysis
 - Two factor availability analysis
 - Comparison of incumbency to availability and annual placement goals
 - AAP goal achievement analysis
 - Applicant flow summary
 - Personnel transaction summary

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AAP Statistical Reports

- **Workforce analysis**
 - Provides a summary of the establishment's job titles
 - By department and race and gender of the employees, as of the beginning of the affirmative action year.
 - Job titles are listed from the lowest paid to the highest paid within each department.
- **Job group analysis**
 - Identifies all employees by
 - Job title, race, and gender in the facility as of the beginning of the affirmative action year.
- **Two factor availability analysis**
 - External availability rate of minorities and females who have requisite skills and reside within the reasonable recruitment area (US Census data)
 - Internal availability rate of minorities and females in the feeder pool (job groups from which employees are promoted in the previous AAP year), typically the level below the job group

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AAP Statistical Reports

- **Comparison of incumbency to availability and annual placement goals**
 - Compares the Availability Analysis
 - Job Group Analysis
 - Goals are established where the difference between incumbency and availability is statistically significant
 - Using a T-test at two standard deviations;
 - Or for small job groups, Fishers Exact or exact binomial test
- **AAP goal achievement analysis**
 - Identifies job groups where goals were established in last year's AAP and reports progress in hiring/promotion opportunities for minorities and/or females

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AAP Statistical Reports

- **Analysis of applicant flow**
 - Identifies by job group, the total number of applicants and hires by race and sex for the prior year
- **Analysis of personnel transactions**
 - Identifies hires, promotions, and terminations by race and sex for the prior year

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What Additional Requirements are Maintained Outside the AAP?

- **Supporting materials**
 - **Impact Ratio Analysis (Adverse Impact Analysis)**
 - Analyzes personnel activity to determine if there is a statistically significant difference in the rates of hiring, promoting and terminating persons by gender and by race/ethnicity.
 - By AAP job group

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What Additional Requirements are Maintained Outside the AAP?

- **Compensation analysis (pay equity analysis)**
 - Analyzes pay to determine if there are differences by gender and race/ethnicity that cannot be justified by legitimate, job-related reasons justified by business necessity.
 - By job title or Pay Analysis Group

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Adverse Impact a Critical Compliance Issue

- **OFCCP compliance evaluation (audit) key metric: Adverse impact in hiring**
- **Adverse impact findings lead to inference of discrimination**
- **OFCCP scrutiny of applicant flow requires accurate and well documented applicant tracking**

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Adverse Impact a Critical Compliance Issue

- **Defense depends on thorough understanding of OFCCP Internet Applicant Definition**
- **An “applicant” is someone who**
 - Expresses interest
 - Is considered for a particular position
 - Has the basic qualifications
 - Does not withdraw

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Special Note—Data Accuracy

- Applicant tracking issues can lead to an appearance of discrimination
 - Too many applicants - Failure to use proper disposition codes
 - Person was not truly “considered” for the job—NOT an applicant
 - Persons lacking basic qualifications are NOT applicants
 - Persons who withdrew are NOT applicants
 - Actively
 - Passively

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Special Note—Data Accuracy

- Too few applicants—Failure to track applicants
 - One to one applicant to hire
 - Too many race/gender unknowns

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How Does the OFCCP Enforce Affirmative Action Obligations?

- All Federal Contractors are subject to audit by the Department of Labor—Office of Federal Contract Compliance Programs (OFCCP)
- Audits will evaluate compliance, especially including
 - Existence of possible adverse impact by race or gender in hiring, promotions, terminations (including race/ethnic sub groups, use favored group analysis)
 - Pay disparities by race or gender (any race or gender)
 - If additional outreach, recruitment, and/or development efforts must be made to improve representation of females or minorities, persons with disabilities, and covered veterans

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How are Federal Contractors Selected for Audit?

- **Federal Contractor Selection System (FCSS)**
—Based on EEO-1 Reports and Census/Industry Data
- **In response to complaints from employees, former employees, applicants or community organizations**
- **Pre-Award compliance review for contracts over \$10 Million**

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What are the Types of Audits?

- **Standard compliance review**
- **Off-site review**
- **Focused review (on-site)**
- **Corporate Management Review (CMR) or “Glass Ceiling” Review**

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What Happens During an Audit?

- **Desk audit**
—Thirty days to submit AAP and support documents
- **Off-site review of documents**
—Anticipate requests for additional information
- **Possible on-site review**
- **Closure, conciliation, or enforcement**

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What are the Outcomes of an Audit?

- **Best outcome**
 - Audit is closed (without an on-site visit)
 - Letter of compliance
- **Mixed outcome**
 - Audit continues to the on-site visit
 - Record-keeping and technical violations
 - Violation for insufficient outreach efforts
 - Conciliation agreement
 - Progress reporting obligation for 1 or 2 years

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What are the Outcomes of an Audit?

- **Worst outcome**
 - Finding of discrimination with demand for back pay and to hire/promote/change compensation of alleged victims
 - Conciliation agreement or enforcement

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Consequences of Violations

- **Settlement with “Conciliation Agreement” to correct major violations by precise actions or a precise time table with reporting obligations, including remedies such as back pay and retroactive seniority**
 - Negative publicity

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Consequences of Violations

- **Referral for consideration of formal enforcement by Department of Labor**
 - Penalties: back pay and interest, prospective relief to an affected individual or class, withhold payments due under a contract, cancel or terminate contract, bar future contracts, recommendation that the EEOC or Department of Justice institute appropriate proceedings under Title VII
- **Debarment & loss of federal contracts**

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How To Prepare For an OFCCP Audit: Overview

- **Scrub the AAP to ensure accuracy**
- **Scrub the Adverse Impact Analysis; if adverse impact**
 - Examine applicant flow, hiring, promotion, termination data for errors/inaccuracy
 - Applicant tracking is almost always a problem
 - Eliminate “non-applicants”; add missing applicants

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How To Prepare For an OFCCP Audit: Overview

- **Review compensation for disparities**
 - Conduct cohort analysis
 - Consider multiple regression analysis
- **Review Goals and Achievement of Prior Year’s Goals**
 - Identify targeted good faith efforts for action plan
 - Review status of same

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**Key Issue in OFCCP Audits:
Hiring/Pre-employment Screening**

- **“Advanced” exploration of applicant screening and tracking process**
 - Applicant tracking review
 - Application review
 - All screening steps
 - Test validation
 - Interview notes

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**Key Issue in OFCCP Audits:
Hiring/Pre-employment Screening**

- **Review of alternate screening processes**
 - Interns and Co-op student hiring
 - College recruiting
 - Temporary to hire conversions
- **All permutations of adverse impact analysis for hiring, promotions, and terminations**
 - Favored group

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Sample Hiring Adverse Impact Document Request by OFCCP

- **For the review period of January 1, 2012, to December 31, 2012, please submit the following by job title relative to the hiring activity for job groups 2E (X Professionals), 2F (Y Professionals) and 5D (Interns/Student Workers)**
- **Total number of applicants and hires by gender, race, and ethnicity**

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Sample Hiring Adverse Impact Document Request by OFCCP

- Provide documents that list the steps of the selection process for the hiring activities, including the application process, the screening/interview process, and how hiring decisions are made.
- If no documents exist, please state this information.

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Effective Handling of Document Requests

- Dramatic increase in scope of requests for
 - Data
 - Documentation
 - Personnel files
 - Contact information
 - Leave and other employer policies
 - Personnel files

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Effective Handling of Document Requests

- Timing of requests earlier
 - Immediately after receipt of scheduling letter
 - OFCCP scanning for systemic issues
 - Not much time to respond

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Typical OFCCP Audit Requests

- Two years' prior vets-100a reports
- Employee orientation materials and handbooks
- Evidence of EEO/AA training for employees and managers
- Disability accommodation and leave of absence policies
- Information regarding employees requesting leaves of absence

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Typical OFCCP Audit Requests

- Information regarding job accommodations requested/provided due to disability
- Further documentation of outreach efforts to minority, women, disabled, and veteran organizations; identification of your veterans representative at your local state employment service; and evidence of ongoing communications and an active relationship with this local representative and other relevant community organizations

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Typical OFCCP Audit Requests

- Documentation of your policy on religious accommodation and any requests for religious accommodations by employees
- Documentation demonstrating the success of outreach efforts
- Information on internal and external employee discrimination complaints

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Typical OFCCP Audit Requests

- Lists of employees self-identifying or currently known to be disabled, disabled veterans or other protected veterans (you may need to do some investigation to gather this information from managers and/or your medical or leave of absence departments)

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Typical OFCCP Audit Requests

- Termination documentation and personnel files
- Job descriptions
- Pre-employment tests and validation studies of those tests (because of OFCCP's scrutiny of tests, any tests should be reviewed with counsel before providing information to OFCCP)

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Typical OFCCP Audit Requests

- Physical or medical exam requirements
- Information about your selection and recruitment processes; and/or
- Information related to other compliance obligations under executive order 11246, section 503, VEVRAA, or their respective implementing regulations

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Additional Compensation Data

- **Wants initial compensation data submission**
 - by gender and particular race/ethnicity data for each employee
 - by job title, EEO-1 category and job group
 - in Excel format, if available
- **Must include base salary, wage rate and hours worked**
- **Bonuses, incentives, commissions, merit increases, locality pay, and/or overtime**

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Additional Compensation Data

- **Documentation and policies related to compensation practices**
- **Factors used to determine employee compensation, such as education, past experience, duty location, performance ratings, department or function, and salary level/band/range/grade**

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Special Issues for Staffing Firms-Temporary Employees

- **Are temporary employees of staffing firms subject to the EEOC and OFCCP record-keeping and affirmative action requirements, including the OFCCP's Internet applicant rule?**
- **To what extent does the EEOC and OFCCP exemption for "recruitment practices" apply to staffing firms' activities?**
- **How should staffing firms comply with customer requests for employee gender, race and ethnicity data?**

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ASA Position

- ASA position since 1965: EEOC's/OFCCP's record-keeping and affirmative action regulations do not apply to temporary employees on the payroll of staffing firms
- Express exclusion of temporary employees from the definition of "employee" in the EEO-1 guidelines.

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ASA Position

- Impossible to visually determine the race or ethnicity of thousands of employees at remote locations
- Concern that race and ethnic data obtained from job applicants could be used in making assignments, thereby subjecting staffing firms to discrimination claims

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Additional Support for ASA Position

- OFCCP affirmative action regulations expressly refer to the EEO-1 report as a required report for prime contractors and subcontractor
- OFCCP guidance and practice generally expects contractors to align their affirmative action programs (AAPs) to be consistent with their EEO-1 report
- EEO-1 report is the primary basis and information upon which the OFCCP selects contractors for audit of their AAPs

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Unsettled Question and OFCCP Approach

- To ASA's knowledge, this position has never been litigated in court or specifically addressed in the OFCCP regulations and has never been definitively resolved
- OFCCP
 - Historical inclination to expand its coverage whenever possible
 - Likely position: temporary employees of staffing firms should be included in their aaps
 - Some OFCCP field auditors have taken this position in the past

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OFCCP Likely Position

- OFCCP regulations at 41 CFR §60-2.1(d):
 - “Each employee in the contractor's workforce must be included in an Affirmative Action program.”
 - Preamble to OFCCP's 2000 amendments re: AAPs
 - “The term ‘employees’ is broad enough to include part-time, temporary and full time employees.”

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OFCCP Likely Position

- OFCCP's proposed initial document request for audits (itemized Listing):
 - Request for employee level compensation data encompasses all employees “including, but not limited to, full-time, part-time, contract, per diem or day labor, temporary.”
 - Neither preamble/itemized listing rises to the level of law or regulation

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OFCCP Audits- If You Exclude Temporary Employees

- **If your AAP excludes temporary employees**
 - And you are audited by the OFCCP;
 - And the agency notices the exclusion of the temporaries;
 - It may allege a violation of its regulations.
 - Remedy: include them in future and/or may try to estimate based on census data
- **If you decline to begin reporting these employees**
 - OFCCP may proceed to litigation

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OFCCP Audits- If You Include Temporary Employees

- **If you include temporary employees in your AAP**
 - OFCCP will expect you to have collected, maintained, and self-audited applicant flow data by race, ethnicity, and gender

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OFCCP Audits- If You Include Temporary Employees

- **Meeting requirement may be very difficult**
 - Must administer a self-identification form to all applicants for temporary positions,
 - Not only those who are interviewed
 - Must track their hire, promotion and termination
 - Must also conduct annual analyses to determine if hiring, promotion or termination of temporary employees results in statistically significant adverse impact by race, ethnicity or gender

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Your Clients' OFCCP Obligations

- Federal contractor clients may require you to maintain and track this information regardless of your status or belief about your own obligations
- Sometimes clients demand that this information be collected as a condition of maintaining the account

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Your Clients' OFCCP Obligations

- Federal contractor clients may require you to maintain and OFCCP auditors frequently take the position that when a temporary-to-hire conversion occurs, temporary employees who
 - Worked in the same position as the converted employee
 - During the period the pool was evaluated for possible hire
 - Should be reported as the client's applicant flow in its AAP

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UGESP Exemption for "Recruitment Practices" Under EEOC and DOL Rules

- Uniform Guidelines on Employee Selection Procedures (1978) EEOC & DOL
 - Specify what records employers should maintain to determine if employment selection procedures have a disparate impact

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UGESP Exemption for “Recruitment Practices” Under EEOC and DOL Rules

- **UGESP 2004 Q&A on Internet recruitment practices**
 - Question 95: “Is Internet recruitment, like traditional recruitment, exempt from UGESP requirements?”
 - Answer: “Yes. As a business practice, recruitment involves identifying and attracting potential recruits to apply for jobs. Under UGESP, ‘recruitment practices are not considered...to be selection procedures,’ and the UGESP requirements geared to monitoring selection procedures do not apply.”

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ASA Position Re: Recruitment Practices


- **Staffing firms that identify and attract recruits for direct hire by clients are engaged in “recruitment practices”**
 - Should be exempt from requirements to maintain applicant flow data
 - Under both the UGESP guidelines as well as the OFCCP regulations pertaining to internet applicants
- **Applies not only to direct placements but also to temporary-to-hire arrangements**
- **ASA position has not been tested in the courts**

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OFCCP Probable Position

- **OFCCP likely would disagree with ASA**
 - If the staffing firm has participated in pre employment screening of candidates
 - Rejecting candidates from further consideration based on their qualifications or other criteria
 - Through resume review, interview, background checking, or employer references


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OFCCP Probable Position

- **Not likely to arise in an OFCCP audit of the staffing firm**
 - Would most likely arise in an audit of the client, when the client's recruiting practices and applicant flow are examined
 - The client and not the staffing agency would receive a notice of violation from the OFCCP should its practices be alleged as non-compliant


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Customer Requests for Gender, Race and Ethnicity Data

- **Federal contractor clients may**
 - request that staffing firms maintain gender, race, and ethnicity applicant information
 - contractually require staffing firms to track and maintain employee and applicant information, including applicant flow data
 - Some staffing firms are being contractually required to use the client's applicant tracking system for data entry of applicant flow information
- **ASA encourages staffing firms to be aware of such possible contractual requirements**

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Practical Solutions to this Challenge

- **Some staffing firms have successfully limited client applicant tracking to only those temporary employees who were actually placed in the job for which the temporary-to-hire conversion(s) subsequently occurred**
- **This is a more practical approach than tracking everyone whom the staffing firm reviewed for possible placement with the client**
- **This approach has been generally acceptable to the OFCCP for temporary-to-hire applicant tracking**

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Corporate Management Compliance Evaluations

- OFCCP sometimes requests to interview recruiting firms used to fill client's senior leadership positions
- OFCCP typically inquires
 - Whether the firm was notified that the client is a federal contractor with equal employment opportunity and affirmative action obligations
 - Was notified of any special efforts it should use to recruit minorities, women, veterans or persons with disabilities, and
 - Whether it maintained applicant flow for its client

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Corporate Management Compliance Evaluations

- OFCCP holds the federal contractor, not the staffing firm, responsible to ensure staffing firm is following required procedures

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Summary of ASA Position

- Despite likely OFCCP challenge, ASA believes that the EEOC & OFCCP record-keeping & affirmative action rules, including the Internet applicant rules, are not applicable to temporary employees, & that staffing firms engaged in recruitment practices may be exempt from the legal requirement to maintain applicant flow data.


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Summary of ASA Position

- At the same time, ASA and its members remain firmly committed to ensuring that temporary employees are recruited, assigned, and employed on a nondiscriminatory basis, and that staffing firms comply with their contractual obligations while assisting customers in meeting their EEO obligations.


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Questions?



Thank You!


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