



March 26, 2020

VIA EMAIL: Leen.Craig@dol.gov

Craig E. Leen
Director
Office of Federal Contractor
Compliance Programs
U. S. Department of Labor
Frances Perkins Building,
200 Constitution Ave., NW
Washington, DC 20210

Re: Request from The Institute for Workplace Equality for Clarification on Data Protocols During Remote Work

Dear Director Leen:

The Institute for Workplace Equality (“IWE” or the “The Institute”) has received numerous questions from its members raising issues as to how the Office of Federal Contract Compliance Programs (OFCCP) will handle their data now that OFCCP employees are working remotely because of the COVID-19 pandemic. The Institute respectfully requests that the agency review the following questions and provide clarification.

Background on The Institute for Workplace Equality

The Institute is a national non-profit employer association based in Washington, D.C. The Institute’s mission includes the education of federal contractors regarding their affirmative action, diversity, and equal employment opportunity responsibilities. Members of The Institute are senior corporate leaders in EEO compliance, compensation, legal, and staffing functions who represent many of the nation’s largest and most sophisticated federal contractors.

Questions from Institute Members

We seek to understand how compliance officers and other OFCCP employees will handle federal contractors’ data now that they are working remotely. The following are our specific questions:

- How will contractors’ data especially compensation and employee specific data be handled by OFCCP employees working remotely?
- Will it be secured within OFCCP’s protocols?
- Will the data be encrypted?

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- Will it pass through firewalls?
- Will compliance officers and other OFCCP employees be able to send, access, store or view contractor data on their home wireless networks or personal computers?
 - If yes, what data protections will be in place to ensure privacy and safeguarding of contractor competitive and sensitive information?

Conclusion

Thank you for responding to these questions during this challenging time. We look forward to clarification from you and the agency on these issues.

Respectfully,

The Institute for Workplace Equality



David B. Cohen



David S. Fortney



Mickey Silberman