

## CLIENT ALERT

### Comment Period for "Fair Pay and Safe Workplaces" Extended – A Bit

Jul.16.2015

In response to several requests from industry to extend the a 60-day comment period for the proposed rulemaking (NPRM) and guidance implementing the "Fair Pay and Safe Workplaces Executive Order," the FAR Council and the DoL have extended the comment period to August 11, 2015 (from the current date of July 27, 2015). As discussed previously here, the NPRM and related DOL guidance (available by PDF here and here and explained in more detail on our government contracts blog) would add onerous labor compliance reporting requirements for all contractors and subcontractors on contracts valued over \$500,000 (and on non-COTS subcontracts valued over \$500,000) and inject uncertainty and subjectivity into the procurement process through the addition of "Agency Labor Compliance Advisors" advising the CO with respect to responsibility determinations based upon a review of the contractor or subcontractor's labor compliance data over a three-year period, which has prompted many contractors and trade associations to express their concerns about the scope and potential impacts of the Proposed Rule and Guidance.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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