

CLIENT ALERT

OMB and DoL Direct Agencies to Appoint Labor Compliance Advisors Pursuant to "Fair Pay" EO

March 9, 2015

On March 5, OMB and DoL circulated a Memorandum to federal agencies regarding the "Fair Pay and Safe Workplaces" Executive Order (previously discussed here, and here), providing "guidance" with respect to the Labor Compliance Advisor role created by the EO, and directing agencies to designate within 90 days a senior-level official to serve as LCA. The memo, which reiterates the troubling scope and nature of the new position (*i.e.*, "providing assistance to contracting officers" during the procurement process, "advising ... contracting officers and other agency officials regarding recommended actions to be taken in response to labor law violations," and "sending any relevant information to suspending and debarring officials"), also states that GSA will create a new web site for the labor compliance reporting requirements identified in the EO, and indicates that FAR Council regulatory action and additional DoL guidance will be forthcoming.

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

Kris D. Meade

Partner – Washington, D.C.
Phone: +1.202.624.2854
Email: kmeade@crowell.com

Stephen J. McBrady

Partner – Washington, D.C.
Phone: +1.202.624.2547
Email: smcbrady@crowell.com