

CLIENT ALERT

Proposed Rule and Guidance Issued for Implementing "Fair Pay and Safe Workplaces" Executive Order

May.28.2015

Today, the Obama Administration published the highly anticipated notice of proposed rulemaking (NPRM) and guidance for implementing the "Fair Pay and Safe Workplaces Executive Order," starting the clock on a 60-day notice and comment period. The NPRM and related 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 contractors and subcontractors on contracts valued over \$500,000 (and on non-COTS subcontracts valued over \$500,000), inject subjectivity into the contract award process through the addition of "Agency Labor Compliance Advisors" advising the CO with respect to responsibility determinations, limit contractors' right to arbitrate certain employment disputes, and add new "paycheck transparency" requirements for contractors.

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

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