Representative Sampling of AGC Members Regarding OFCCP's Proposed Veterans Regulations

SECTION 4212 VETERANS	Company A	Company B	Company C	OFCCP's Cost Estimate Under Newly Proposed Veterans Rules
How many total employees did your company report on its most recent (2011) consolidated Employer Information Report (EEO-1)?	2000	1000	1500	
Approximately how many total U.S. establishments, including construction job sites, did your company have in 2011?	75	20	100	
Approximately how many total U.S. establishments, not including construction job sites, did your company have in 2011?	2	3	9	
Approximately what was your company's annual sales volume in 2011?	$290 mil	$800 mil	$950 mil	
Approximately how much time do you anticipate it would take to design, build, test, and implement the systems, forms, and procedures required to collect and maintain the following:				
Pre-offer veterans data from all job applicants	1000 hours	480-960 hours	500 hours	
Post-offer veterans data from all job applicants	1000 hours	480-960 hours	500 hours	
Annual anonymous survey of all employees as to veteran status	250 hours	480-960 hours	200 hours	
Please provide your best estimate as to the total financial costs of designing, building, testing, and implementing systems, forms, and procedures required to collect and maintain the following:				
Pre-offer veteran status data from all job applicants	$40,000	$5,000-$7,000	$30,000	
Post-offer veteran status data from all job applicants	$20,000	$5,000-$7,000	$30,000	
Anonymous surveys of all employees as to their veteran status	$50,000 "This would push us over the limit and would require adding another staff person."	$12,000-$15,000	$15,000	
Approximately how much labor time by your management or human resource staff is required, or do you anticipate will be required for the following actions:				

Representative Sampling of AGC Members Regarding OFCCP's Proposed Veterans Regulations

To initiate a written linkage agreement with an employment service center that specializes in the training and/or placement of veterans	Unknown	160 hours	500 hours
To maintain and update each such written linkage agreement	Unknown	Ongoing throughout the year. Total time, 40-80 hours per year.	1000 hours
To send a written notification of your company's affirmative action policy to each of your company's subcontractors annually	100 hours	80-120 hours	50 hours
To prepare and maintain a file for each veteran applicant or employee on an annual basis containing specific information containing the required information about hiring, training and promotion opportunities that he or she was considered for, and reasons he or she was not selected	Unknown	480-640 hours	2000 hours
To perform an annual review of the physical and mental job qualifications for all jobs, and document the reviews, listing each physical and mental job qualification for each job and explaining why each requirement is related to the job to which it corresponds	Unknown	960-1280 hours	400 hours
Related to the annual review of job qualifications, what is your estimate of any other annual costs related to this requirement, for example, costs associated with subject-matter experts such as I/O phychologists, consultants, lawyers, etc.?	$100,000+	$12,000-$15,000 for outside professionals only. This does not include staff time.	$50,000

Representative Sampling of AGC Members Regarding OFCCP's Proposed Veterans Regulations

OFCCP is proposing to require contractors evaluate the effectiveness of each outreach effort annually, to document the evaluation and identify modifications made to the affirmative action plan as a result. These evaluations must include the analysis of new veteran data points that contractors will be required to collect such as the number of referrals of veterans from organizations such as the Employment One-Stop Career Center and other groups with which the company has linkage agreements, the number of applicants who self-identified as veteran individuals with disabilities, the ratio of jobs filled to job openings, the ratio of veteran applicants to all applicants, the ratio of veterans hired to all hires, and more. Approximately how much labor time by your management or human resource staff is required, or do you anticipate would be required, to perform all of these reviews in total on an annual basis?	"We do not even begin to have the capability to do this in house. Our people are already overwhelmed by trying to be even close to compliance. We would have to hire a ful time compliance person and that just won't happen."	480 hours	2,000-4,000 hours
Approximately how many hours would it take to design, build, test, and implement the systems, forms, and procedures required to do so?	"See note above."	960 hours	1,500 hours
OFCCP is proposing to require contractors to disseminate their affirmative action policy internally by including it in the contractor's policy manual, discussing it thoroughly in employee orientation and management training programs, and meeting with union officials, if applicable, to inform them of the policy while requesting their cooperation. The proposal also would require contractors to provide annual training regarding the affirmative action program obligations and procedures for veterans to each manager or other employee with hiring authority or influence. How many hours of professional labor do you anticipate will be required for the following:			
Initially design and plan a management or decision-maker training module	100+ hours	320-480 hours	2000 hours
Annually update and revise the management or decision-maker training module	100 hours	160-320 hours	300 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Veterans Regulations

Initially design and plan a non-management training/orientation module which "thoroughly" discusses the company's nondiscrimination and affirmative action policies for veterans	100 hours	160-320 hours	300 hours
Annually update and review a non-management training/orientation module which "thoroughly" discusses the company's nondiscrimination and affirmative action policies for veterans	100 hours	160 hours	150 hours
Approximately how many employees do you anticipate will be required to receive this annual training for managers or decision-makers?	51-100	100+	100+
What is the expected average time that each manager or decision-maker will be engaged in the training activity?	31-60 minutes	60-120 minutes	60-120 minutes
What is the expected average time that all other employees will be engaged in the training activity?	11-30 minutes	31-60 minutes	31-60 minutes

Representative Sampling of AGC Members Regarding OFCCP's Proposed Veterans Regulations

If you have any additional comments regarding this proposed rule and how it will affect your company's operations, please enter them here.	"We have way too many rules aready. Construction is different, especially in traveling companies where most HR activities occur in the field by non-HR employees.	"We feel this proposed rule would place an undue burden on our operations, negatively impacting both time and cost for labor intensive tracking and monitoring required. Additionally, we feel that we have current hiring and recruiting processes in place with support our EEO efforts and provide disabled individuals an equitable opportunity to apply for an receive consideration for any position for which they are qualified."	"It appears that OFCCP is crossing the line here and overburdening companies with rules that dictate how we run our business to a point where we are having nearly impossible standards and recordkeeping requirements put upon us. In the construction industry, in particular, we need to continually consider safety on our projects and we feel the OFCCP proposed rules and our need to maintain a safe work environment are not aligned. There is a clear lack of understanding of not only our industry, but also of the reality of work in setting up and documenting the metrics being asked for here."	
How many staff members are in your HR/Compliance department?	2	2	10+	
TOTAL ESTIMATED TIME PER CONTRACTOR	6,590 hours	5,400-7,880 hours	11,400-15,400 hours	
TOTAL ESTIMATED TIME PER CONTRACTOR ESTABLISHMENT (NOT INCLUDING CONSTRUCTION JOBSITES.)	3,295 hours	1,800-2,627 hours	1,267-1,711 hours	9 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Veterans Regulations

ESTIMATED # OF STAFF REQUIRED (TIME/1920 HOURS)	3.43	2.81-4.10	5.94-8.02	
TOTAL ESTIMATED COST PER CONTRACTOR	$210,000	$34,000-$44,000	$125,500	
TOTAL ESTIMATED COST PER EMPLOYEE	$105	$34-$44	$83.67	
TOTAL ESTIMATED COST PER ESTABLISHMENT (NOT INCLUDING CONSTRUCTION JOBSITES)	$105,000	$11,333-$14,667	$13,944	$560
TOTAL ESTIMATED COST PER $ VOLUME OF BUSINESS	$1,381	$18,181.82-$23,529.41	$7,570	
	*Many costs are unknown by this contractor.			

In addition to the technical costs for compliance, the total estimated time per contractor to comply with the rule will increase the cost burden on contractors. For the contractors represented here, costs will increase due to the requirement to add 0-2 additional staff administrators. At an estimated $50,000 per person, the cost to comply would increase up to $100,000 per contractor.

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

SECTION 503 INDIVIDUALS WITH DISABILITIES	Company A	Company B	Company C	OFCCP's Cost Estimate Under Newly Proposed Disabilities Rules
How many total employees did your company report on its most recent (2011) consolidated Employer Information Report (EEO-1)?	2000	1000	1500	
Approximately how many total U.S. establishments, including construction job sites, did your company have in 2011?	75	20	100	
Approximately how many total U.S. establishments, not including construction job sites, did your company have in 2011?	2	3	9	
Approximately what was your company's annual sales volume in 2011?	$290 mil	$800 mil	$950 mil	
Approximately how much time do you anticipate it would take to design, build, test, and implement the systems, forms, and procedures required to collect and maintain the following:				
Pre-offer disability data from all job applicants	1000 hours	480-960 hours	500 hours	
Post-offer disability data from all job applicants	1000 hours	480-960 hours	500 hours	
Annual anonymous survey of all employees as to their disability status	250 hours (would decrease morale among employees)	480-960 hours	200 hours	

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

Please provide your best estimate as to the total financial costs of designing, building, testing, and implementing systems, forms, and procedures required to collect and maintain the following:			
Pre-offer disability status data from all job applicants	$40,000	$5,000-$7,000	$30,000
Post-offer disability status data from all job applicants	$20,000	$5,000-$7,000	$30,000
Anonymous surveys of all employees as to their disability status	$50,000 "This would push us over the limit and would require adding another staff person."	$12,000-$15,000	$15,000
Approximately how much labor time by your management or human resource staff is required, or do you anticipate will be required for the following actions:			
To initiate a written linkage agreement with an employment service center that specializes in the training and/or placement of individuals with disabilities	Unknown	160 hours	500 hours
To maintain and update each such written linkage agreement	Unknown	Ongoing throughout the year. Total time, 40-80 hours per year	1000 hours
To send a written notification of your company's affirmative action policy to each of your company's subcontractors annually	100 hours	80-120 hours per year	50 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

To prepare and maintain a file for each disabled applicant or employee on an annual basis containing specific information regarding each known disabled applicant and employee containing the required information about hiring, training and promotion opportunities that he or she was considered for, and reasons he or she was not selected	Unknown	480-640 hours per year	2000 hours
To perform an annual review of the physical and mental job qualifications for all jobs, and document the reviews, listing each physical and mental job qualification for each job and explaining why each requirement is related to the job to which it corresponds	Unknown	960-1280 hours per year	400 hours
Related to the annual review of job qualifications, what is your estimate of any other annual costs related to this requirement, for example, costs associated with subject-matter experts such as I/O phychologists, consultants, lawyers, etc.?	$100,000+	$12,000-$15,000 for outside professionals only. This does not include staff time.	$50,000

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

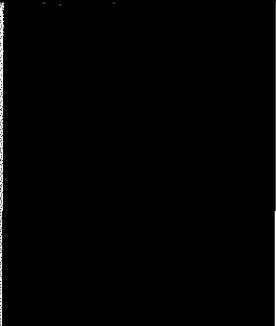|				
OFCCP is proposing to require contractors evaluate the effectiveness of each outreach effort annually, to document the evaluation and identify modifications made to the affirmative action plan as a result. These evaluations must include the analysis of ten new disability data points that contractors will be required to collect such as the number of referrals of individuals with disabilities from organizations such as the Employment One-Stop Career Center and other groups with which the company has linkage agreements, the number of applicants who self-identified as individuals with disabilities, the ratio of jobs filled to job openings, the ratio of applicants with disabilities to all applicants, the ratio of individuals with disabilities hired to all hires, and more. Approximately how much labor time by your management or human resource staff is required, or do you anticipate would be required, to perform all of these reviews in total on an annual basis?	"We do not even begin to have the capability to do this in house. Our people are already overwhelmed by trying to be even close to compliance. We would have to hire a ful time compliance person and that just won't happen."	480 hours annually	2,000-4,000 hours annually	
Approximately how many hours would it take to design, build, test, and implement the systems, forms, and procedures required to do so?	"See note above."	960 hours	1,500 hours	

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

OFCCP is proposing to require contractors to disseminate their affirmative action policy internally by including it in the contractor's policy manual, discussing it thoroughly in employee orientation and management training programs, and meeting with union officials, if applicable, to inform them of the policy while requesting their cooperation. The proposal also would require contractors to provide annual training regarding the affirmative action program obligations and procedures for persons with disabilities to each manager or other employee with hiring authority or influence. How many hours of professional labor do you anticipate will be required for the following:			
Initially design and plan a management or decision-maker training module	100+ hours	320-480 hours	2000 hours
Annually update and revise the management or decision-maker training module	100 hours	160-320 hours annually	300 hours
Initially design and plan a non-management training/orientation module which "thoroughly" discusses the company's nondiscrimination and affirmative action policies for individuals with disabilities	100 hours	160-320 hours annually	300 hours
Annually update and review a non-management training/orientation module which "thoroughly" discusses the company's nondiscrimination and affirmative action policies for individuals with disabilities	100 hours	160 hours annually	150 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

Approximately how many employees do you anticipate will be required to receive this annual training for managers or decision-makers?	51-100	100+	100+
What is the expected average time that each manager or decision-maker will be engaged in the training activity?	31-60 minutes	60-120 minutes	60-120 minutes
What is the expected average time that all other employees will be engaged in the training activity?	11-30 minutes	31-60 minutes	31-60 minutes
OFCCP is proposing to require federal contractors to create and implement written procedures for processing reasonable accommodation requests. The proposed regulations would require that contractors disseminate the reasonable accommodation procedures to all employees, and train supervisors and managers on the accommodation procedures on an annual basis. Approximately how many hours would it take to design, build, test, and implement the systems, forms, and procedures required to comply with the reasonable accommodation procedure requirements?	Unknown	"This would take a comprehensive initiative to update our systems and reporting software which could take 960-1280 hours, minimum.	300 hours
Please provide your best estimate as to the total financial costs of designing, building, testing, and implementing the systems, forms, and procedures with regard to the written accommodation policy.	$20,000	$30,000-$35,000* (including legal	$1,500

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

Approximately how much time do you anticipate it will take to process, and either grant or deny an average request for reasonable accomodation in a manner that fully complies with the proposed requirements?	2 hours - "We are biased toward meeting the accommodation request. The challenge is that people don't make requests."	40-80 hours	1200 hours	

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

| If you have any additional comments regarding this proposed rule and how it will affect your company's operations, please enter them here. | "We have way too many rules aready. Construction is different, especially in traveling companies where most HR activities occur in the field by non-HR employees. | "We feel this proposed rule would place an undue burden on our operations, negatively impacting both time and cost for labor intensive tracking and monitoring required. Additionally, we feel that we have current hiring and recruiting processes in place with support our EEO efforts and provide disabled individuals an equitable opportunity to apply for an receive consideration for any position for which they are qualified." | "It appears that OFCCP is crossing the line here and overburdening companies with rules that dictate how we run our business to a point where we are having nearly impossible standards and recordkeeping requirements put upon us. In the construction industry, in particular, we need to continually consider safety on our projects and we feel the OFCCP proposed rules and our need to maintain a safe work environment are not aligned. There is a clear lack of understanding of not only our industry, but also of the reality of work in setting up and documenting the metrics being asked for here." | |

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

How many staff members are in your HR/Compliance department?	2	2	10+	
TOTAL ESTIMATED TIME PER CONTRACTOR	6,592 hours	6,400-9,240 hours	13,000-17,000 hours	
TOTAL ESTIMATED TIME PER CONTRACTOR ESTABLISHMENT (NOT INCLUDING CONSTRUCTION JOBSITES)	3,296 hours	2,133-3,080 hours	1,444-1,888 hours	7.8 hours
ESTIMATED # OF STAFF REQUIRED (TIME/1920 HOURS)	3.43	3.33-4.81	6.77-8.85	
TOTAL ESTIMATED COST PER CONTRACTOR	$230,000	$64,000-$79,000	$126,500	
TOTAL ESTIMATED COST PER EMPLOYEE	$115	$64-$79	$84	
TOTAL ESTIMATED COST PER ESTABLISHMENT (NOT INCLUDING CONSTRUCTION JOBSITES)	$115,000	$21,313-$26,333	$14,056	$473
TOTAL ESTIMATED COST PER $ VOLUME OF BUSINESS	$1,261	$10,127-$12,500	$7,510	
	* Many costs are unknown by this contractor.			

In addition to the technical costs for compliance, the total estimated time per contractor to comply with the rule will increase the cost burden on contractors. For the contractors represented here, costs will increase due to the requirement to add 0-2 additional staff administrators. At an estimated $50,000 per person, the cost to comply would increase up to $100,000 per contractor.

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

SECTION 503 INDIVIDUALS WITH DISABILITIES	Company A	Company B	Company C	OFCCP's Cost Estimate Under Newly Proposed Disabilities Rules
How many total employees did your company report on its most recent (2011) consolidated Employer Information Report (EEO-1)?	2000	1000	1500	
Approximately how many total U.S. establishments, including construction job sites, did your company have in 2011?	75	20	100	
Approximately how many total U.S. establishments, not including construction job sites, did your company have in 2011?	2	3	9	
Approximately what was your company's annual sales volume in 2011?	$290 mil	$800 mil	$950 mil	
Approximately how much time do you anticipate it would take to design, build, test, and implement the systems, forms, and procedures required to collect and maintain the following:				
Pre-offer disability data from all job applicants	1000 hours	480-960 hours	500 hours	
Post-offer disability data from all job applicants	1000 hours	480-960 hours	500 hours	
Annual anonymous survey of all employees as to their disability status	250 hours (would decrease morale among employees)	480-960 hours	200 hours	

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

Please provide your best estimate as to the total financial costs of designing, building, testing, and implementing systems, forms, and procedures required to collect and maintain the following:			
Pre-offer disability status data from all job applicants	$40,000	$5,000-$7,000	$30,000
Post-offer disability status data from all job applicants	$20,000	$5,000-$7,000	$30,000
Anonymous surveys of all employees as to their disability status	$50,000 "This would push us over the limit and would require adding another staff person."	$12,000-$15,000	$15,000
Approximately how much labor time by your management or human resource staff is required, or do you anticipate will be required for the following actions:			
To initiate a written linkage agreement with an employment service center that specializes in the training and/or placement of individuals with disabilities	Unknown	160 hours	500 hours
To maintain and update each such written linkage agreement	Unknown	Ongoing throughout the year. Total time, 40-80 hours per year	1000 hours
To send a written notification of your company's affirmative action policy to each of your company's subcontractors annually	100 hours	80-120 hours per year	50 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

To prepare and maintain a file for each disabled applicant or employee on an annual basis containing specific information regarding each known disabled applicant and employee containing the required information about hiring, training and promotion opportunities that he or she was considered for, and reasons he or she was not selected	Unknown	480-640 hours per year	2000 hours	
To perform an annual review of the physical and mental job qualifications for all jobs, and document the reviews, listing each physical and mental job qualification for each job and explaining why each requirement is related to the job to which it corresponds	Unknown	960-1280 hours per year	400 hours	
Related to the annual review of job qualifications, what is your estimate of any other annual costs related to this requirement, for example, costs associated with subject-matter experts such as I/O phychologists, consultants, lawyers, etc.?	$100,000+	$12,000-$15,000 for outside professionals only. This does not include staff time.	$50,000	

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

OFCCP is proposing to require contractors evaluate the effectiveness of each outreach effort annually, to document the evaluation and identify modifications made to the affirmative action plan as a result. These evaluations must include the analysis of ten new disability data points that contractors will be required to collect such as the number of referrals of individuals with disabilities from organizations such as the Employment One-Stop Career Center and other groups with which the company has linkage agreements, the number of applicants who self-identified as individuals with disabilities, the ratio of jobs filled to job openings, the ratio of applicants with disabilities to all applicants, the ratio of individuals with disabilities hired to all hires, and more. Approximately how much labor time by your management or human resource staff is required, or do you anticipate would be required, to perform all of these reviews in total on an annual basis?	"We do not even begin to have the capability to do this in house. Our people are already overwhelmed by trying to be even close to compliance. We would have to hire a ful time compliance person and that just won't happen."	480 hours annually	2,000-4,000 hours annually
Approximately how many hours would it take to design, build, test, and implement the systems, forms, and procedures required to do so?	"See note above."	960 hours	1,500 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

OFCCP is proposing to require contractors to disseminate their affirmative action policy internally by including it in the contractor's policy manual, discussing it thoroughly in employee orientation and management training programs, and meeting with union officials, if applicable, to inform them of the policy while requesting their cooperation. The proposal also would require contractors to provide annual training regarding the affirmative action program obligations and procedures for persons with disabilities to each manager or other employee with hiring authority or influence. How many hours of professional labor do you anticipate will be required for the following:			
Initially design and plan a management or decision-maker training module	100+ hours	320-480 hours	2000 hours
Annually update and revise the management or decision-maker training module	100 hours	160-320 hours annually	300 hours
Initially design and plan a non-management training/orientation module which "thoroughly" discusses the company's nondiscrimination and affirmative action policies for individuals with disabilities	100 hours	160-320 hours annually	300 hours
Annually update and review a non-management training/orientation module which "thoroughly" discusses the company's nondiscrimination and affirmative action policies for individuals with disabilities	100 hours	160 hours annually	150 hours

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

Approximately how many employees do you anticipate will be required to receive this annual training for managers or decision-makers?	51-100	100+	100+
What is the expected average time that each manager or decision-maker will be engaged in the training activity?	31-60 minutes	60-120 minutes	60-120 minutes
What is the expected average time that all other employees will be engaged in the training activity?	11-30 minutes	31-60 minutes	31-60 minutes
OFCCP is proposing to require federal contractors to create and implement written procedures for processing reasonable accommodation requests. The proposed regulations would require that contractors disseminate the reasonable accommodation procedures to all employees, and train supervisors and managers on the accommodation procedures on an annual basis. Approximately how many hours would it take to design, build, test, and implement the systems, forms, and procedures required to comply with the reasonable accommodation procedure requirements?	Unknown	"This would take a comprehensive initiative to update our systems and reporting software which could take 960-1280 hours, minimum.	300 hours
Please provide your best estimate as to the total financial costs of designing, building, testing, and implementing the systems, forms, and procedures with regard to the written accommodation policy.	$20,000	$30,000-$35,000* (including legal	$1,500

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

Approximately how much time do you anticipate it will take to process, and either grant or deny an average request for reasonable accomodation in a manner that fully complies with the proposed requirements?	2 hours - "We are biased toward meeting the accommodation request. The challenge is that people don't make requests."	40-80 hours	1200 hours	

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

| If you have any additional comments regarding this proposed rule and how it will affect your company's operations, please enter them here. | "We have way too many rules aready. Construction is different, especially in traveling companies where most HR activities occur in the field by non-HR employees. | "We feel this proposed rule would place an undue burden on our operations, negatively impacting both time and cost for labor intensive tracking and monitoring required. Additionally, we feel that we have current hiring and recruiting processes in place with support our EEO efforts and provide disabled individuals an equitable opportunity to apply for an receive consideration for any position for which they are qualified." | "It appears that OFCCP is crossing the line here and overburdening companies with rules that dictate how we run our business to a point where we are having nearly impossible standards and recordkeeping requirements put upon us. In the construction industry, in particular, we need to continually consider safety on our projects and we feel the OFCCP proposed rules and our need to maintain a safe work environment are not aligned. There is a clear lack of understanding of not only our industry, but also of the reality of work in setting up and documenting the metrics being asked for here." | |

Representative Sampling of AGC Members Regarding OFCCP's Proposed Disabilities Regulations

How many staff members are in your HR/Compliance department?	2	2	10+	
TOTAL ESTIMATED TIME PER CONTRACTOR	6,592 hours	6,400-9,240 hours	13,000-17,000 hours	
TOTAL ESTIMATED TIME PER CONTRACTOR ESTABLISHMENT (NOT INCLUDING CONSTRUCTION JOBSITES)	3,296 hours	2,133-3,080 hours	1,444-1,888 hours	7.8 hours
ESTIMATED # OF STAFF REQUIRED (TIME/1920 HOURS)	3.43	3.33-4.81	6.77-8.85	
TOTAL ESTIMATED COST PER CONTRACTOR	$230,000	$64,000-$79,000	$126,500	
TOTAL ESTIMATED COST PER EMPLOYEE	$115	$64-$79	$84	
TOTAL ESTIMATED COST PER ESTABLISHMENT (NOT INCLUDING CONSTRUCTION JOBSITES)	$115,000	$21,313-$26,333	$14,056	$473
TOTAL ESTIMATED COST PER $ VOLUME OF BUSINESS	$1,261	$10,127-$12,500	$7,510	
	* Many costs are unknown by this contractor.			

In addition to the technical costs for compliance, the total estimated time per contractor to comply with the rule will increase the cost burden on contractors. For the contractors represented here, costs will increase due to the requirement to add 0-2 additional staff administrators. At an estimated $50,000 per person, the cost to comply would increase up to $100,000 per contractor.