March 2, 2015

General Services Administration
Regulatory Secretariat (MVCB)
1800 F Street, N.W. 2nd Floor
Washington, D.C. 20405-0001
Attn: Hada Flowers

Ref: FAR Case 2013-001 – Ending Trafficking in Persons

Dear Ms. Flowers:

We are writing to respectfully request a 60-day extension to the March 2, 2015 effective date of FAR Case 2013-001, “Strengthening Protections Against Trafficking in Persons in Federal Contracts” as published on January 29, 2015.

As you are aware, industry fully supports the objectives and the goals of Executive Order 13627 in addition to the relevant statutory provisions contained within the National Defense Authorization Act for FY 2013. However, the complexity and scope of the rule requires additional time for industry and federal agencies alike to effectively and meaningfully implement a number of compliance-related elements of the rule.

We strongly recommend an extension of the final rule’s effective date pending (i) completion of the FAR Council effort to define "recruitment fee," and (ii) fulfillment of the requirement established in Section 3 of E.O. 13627 for guidance from the Office of Federal Procurement Policy (OFPP) on compliance plans. Without a clear understanding of what constitutes recruitment fees or a compliance plan, companies are unable to certify they are in compliance with the final rule.

Accordingly, due to immediate impact of the final rule upon the award of federal contracts, we respectively request delay of enforcement to allow for the above cited issues to be addressed.

Respectfully submitted,

Council for Global Immigration
Equal Employment Advisory Council
HR Policy Association
IT Alliance for Public Sector
Society for Human Resource Management
U.S. Chamber of Commerce
United States Council for International Business