



OFCCP COMPLIANCE CHECKLIST

As a Federal contractor you are required to create and maintain compliant Affirmative Action Programs (AAP) along with following regulations and guidelines set forth by the Department of Labor's Office of Federal Contract Compliance Programs (OFCCP). There's a lot to understand, but this checklist will give you an outline to start.

FIRST OF THE YEAR

Determine your AAP year. You may choose any 12-month period but using a calendar year will make it easier to also create your EEO-1 and VETS-4212 reports.

Determine how many AAPs will be required.

Assign responsibility for AAPs in your organization.

AAP Narratives for Women & Minorities, Individuals with Disabilities and Veterans must be created.

Collect first of year employee data for the beginning baseline of your employee population.

- Create your Organizational Profile
- Job Group Analysis
- Place incumbents in Job Groups
- Determine Availability
- Compare incumbency to availability
- Set Placement Goals

Ensure your applicant and recruiting processes are clearly defined and followed by all those involved.

Communicate the organization's obligations to comply with [Executive Order 11246](#).

Understand contractor [recordkeeping requirements](#).

END OF AAP YEAR

Collect end of year employee data and applicant flow logs to create reports showing any problem areas that may exist in personnel activities having selection disparities.

Review areas of underutilization for minorities and females and [document good faith](#) recruiting efforts.

Review compensation systems for gender, race or ethnicity-based disparities.

Evaluate outreach and good faith efforts for Veterans and Individuals with Disabilities AAPs.

Collect AAP first of year employee data for creating new year reports.

ONGOING

RECRUITING:

Conduct, document and evaluate [good faith outreach](#) efforts.

Ensure mandatory job listings in manner appropriate to your [Employment Service Delivery System](#) (ESDS). Provide additional company information to appropriate ESDS (CFR 60-300.5a(4)).

[Self-ID](#) forms (pre and post offer) must be maintained.

POLICIES AND POSTINGS:

[“EEO is the Law”](#) poster for applicants and employees and [“EEO is the Law Supplement”](#).

Update EEO Policy Statement annually and post it along with policy manual and EEO notices.

Include Equal Opportunity (EO) clause and NLRA clause in sub-contracts and purchase orders.

Provide written notice of AAP obligations to subcontractors (CFR 60.741.44(f)) and labor organizations with which you have a collective bargaining agreement.

Include required taglines on job ads.

Ensure online accessibility statement is posted.

Post applicable federal and state law posters.

Pay Transparency Policy Statement and [Poster \(EO 13665\)](#) should be evident.

Executive Order 13496 notification is required (NLRA).

EMPLOYMENT PROCESS

Ensure and document reasonable accommodations for applicants and employees with disabilities.

ANNUALLY

AUDIT & REPORTING

Review and address any areas of adverse impact in new hire, termination, or promotion activity.

Update AAPs.

Conduct annual Veterans and Individuals with Disabilities analyses (keep for 3 years).

Conduct an evaluation of outreach and good faith efforts for Veterans and Individuals with Disabilities each year.

Review your Audit and Reporting systems and personnel processes.

Review and document job descriptions analysis, especially physical and mental job requirements.

File and retain copies of [EEO-1](#) Reports (3 years) and [VETS-4212](#) (1 year), if required.

Perform compensation analyses to ensure compliance with Equal Pay regulations.

PERIODICALLY

[Survey employees](#) every 5 years. At least once during the intervening years between these invitations, you must remind your employees that they may voluntarily update their status.

Call **HudsonMann** for a better understanding of all that is required for **OFCCP Compliance!**