

OFCCP Compliance Audit Checklist

AAP Technical Compliance and Statistical Analyses

- ☐ Organizational Profile: for each department or unit show the total number of males, females, and minorities, and the job title, gender, race, and ethnicity of the supervisor
- ☐ Job Group Analysis: group job titles that have similar duties, salary, promotional opportunities, and identify the percentage of minorities and women in each job group
- ☐ Availability Analysis: for each job group, determine the percentage of qualified minority and women candidates available externally and internally
- ☐ Utilization Analysis: for each job group, determine whether the percentage of minorities and females is less than what reasonably would be expected based on their availability
- ☐ Placement Goals: establish for job groups, where necessary, based on utilization analysis
- ☐ Goal Progress: for each job group for which a goal was established, determine whether it was met and identify good faith efforts taken in prior plan year if it was not met
- ☐ Hiring Benchmark: establish a hiring benchmark for veterans
- ☐ Utilization Goal: measure against nationwide 7% utilization goal for individuals with disabilities
- ☐ Data Collection Analysis: collect and analyze data on # of veterans/individuals with disabilities who applied and # of veterans/individuals with disabilities hired
- ☐ Action Plans: establish steps and activities to meet placement goals and correct problem areas identified
- ☐ Documentation: record information for all steps undertaken to demonstrate compliance
- ☐ Impact Ratio Analyses: Calculate and analyze hires, promotions, and terminations (consider doing so under attorney-client privilege)
- ☐ Compensation Analysis: consider conducting some form of analysis (consider doing so under attorney-client privilege)
- ☐ Tests: determine if they are valid and have an adverse impact (consider doing so under attorney-client privilege)

Mandatory Job Listing and Outreach

- ☐ Are jobs being listed with the state job bank or employment service delivery system (ESDS)?
- ☐ Randomly audit some of your open positions to see if you can find them listed
- ☐ Do you have evidence of listing, such as a screenshot of the job posted on the ESDS or a job order number from the ESDS?
- ☐ Contractor's outreach and recruitment efforts
Did you make contact and have ongoing relationships with minority, women, disabled, and veteran organizations, and did you communicate your open positions to them?
- ☐ Did you attend job fairs and recruiting events for minority, women, individuals with disabilities, and veterans?
- ☐ What does your workforce look like? Do you have a significant number of employees who are minorities, women, individuals with disabilities, and veterans?
- ☐ Did you conduct an annual assessment of your outreach efforts and document your findings?
- ☐ Did you identify alternative recruiting sources to improve your results?

Postings

- ☐ EEO is the Law (federal government poster) and GINA addendum
- ☐ Notification of Employee Rights Under Federal Labor Laws (EO 13496), if applicable
- ☐ Contractor's Equal Employment Opportunity policy statement
- ☐ Contractor's Invitation for individuals with a disability and covered veterans to self-identify

Accessibility of Workplace and Website

- ☐ Accessibility of physical site to individuals with disabilities: parking and entrance, restrooms, application computers/kiosks
- ☐ Contractor's career site and online application
 - Is a person with a disability able to complete the application successfully?
 - Does it provide information on how to request for accommodation?

Notices and Letters

- ☐ EEO/AA employer tagline on job postings and employment application
- ☐ EEO clauses in purchase orders and subcontracts
- ☐ Letters to covered vendors, subcontractors and suppliers, unions, recruitment sources and linkage groups regarding EEO/AA obligations





Forms, Policies, and Processes

- ☐ Voluntary self-identification forms (pre and post offer)
- ☐ Anti-Discrimination policy
- ☐ Anti-Harassment policy
- ☐ FMLA policy
- ☐ Maternity/Pregnancy and Medical Leave policy
- ☐ Disability and Religious Accommodation policies
- ☐ Selection and hiring process (document it)
- ☐ Compensation policy
- ☐ Union contracts
- ☐ Employment application (ensure it complies with federal and state laws)
- ☐ Job descriptions

Mandatory Job Listing and Outreach

- ☐ Copies of EEO-1 Reports (3 years), VETS 4212 Reports (3 years)
- ☐ Applicant Flow logs – test your applicant data for accuracy
- ☐ Accommodation log
- ☐ EEO complaint and grievance log (including FMLA, LOA, and disability accommodation complaints)
- ☐ Training log

Accessibility of Workplace and Website

- ☐ Ensure that staffing and temporary agencies as well as professional employment organizations comply with your AA/EEO and record keeping obligations and discuss who will maintain necessary information

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