



Beyond the Preparation of the Affirmative Action Plan

A Comprehensive Checklist for Federal Contractors

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Prevent Discrimination

General Prohibition Against Discrimination

Prevent discrimination against applicants and employees where this discrimination is based on one or more of the following characteristics: race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or protected veteran status.

No Segregated Facilities

Ensure that there are no facilities that are segregated on the basis of race, color, religion, or national origin.

Collect Demographic Data

Collection of Demographic Data on Applicants

Prevent discrimination against applicants and employees where this discrimination is based on one or more of the following characteristics: race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or protected veteran status.

Collection of Demographic Data on Employees

Provide new hires with an opportunity to self-identify their race, ethnicity, sex, protected veteran status, and disability status.

Re-Survey of the Entire Workforce

Conduct a re-survey of the entire workforce once every five years to provide employees an opportunity to self-identify their disability status.

At least once in the intervening years, send employees a formal reminder that they are allowed to update information on their disability status in the company's HR systems.

Forms Used to Collect Demographic Data

Use the self-identification form that OFCCP has developed whenever information on disability status is collected from applicants or employees.

Analyze Demographic Data

Analysis of Demographic Data

Review demographic data on applicants, hires, promotions, terminations, and other forms of personnel activity to determine whether there are statistical disparities involving members of any particular race, ethnicity, or sex.

Analysis of Data Regarding Outreach

Annually review demographic data on applicants, hires, and job changes in order to determine the effectiveness of outreach and recruitment efforts for individuals with disabilities and protected veterans.

Progress Towards Meeting Placement Goals

Annually determine whether placement goals set for minorities and females in the previous year's affirmative action plan were met.

Disability Utilization Analysis

Annually compare employment in each affirmative action job group against the disability utilization goal established by OFCCP.

Outreach and Recruitment

Outreach

Make specific, concerted efforts to recruit minorities, females, protected veterans, and individuals with disabilities.

Analysis of Data Regarding Outreach

Conduct an assessment regarding the effectiveness of outreach efforts to recruit and employ individuals with disabilities and protected veterans.

Tag Lines

Include tag lines with all ads and job postings indicating that the employer is an equal opportunity employer. The tagline must include some form of the words "veteran" and "individual with a disability". If any of the classes covered by Executive Order 11246 are included in the tagline, then all classes must be included in the tagline.

Listing with State Employment Service

List open positions with the local state employment service office.

Notices to Employees, Applicants, and Suppliers/Vendors

EEO Notice to Employees

Make the federal "Know Your Rights" poster available to employees.

EEO Notice to Applicants

Make the federal "Know Your Rights" poster available to applicants.

Notice to Applicants Regarding Accommodation with Application Process

Make individuals with disabilities who are applying for positions aware that the employer will provide reasonable accommodation with the application process when requested to do so.

Pay Transparency Notice

Make applicants and employees aware that no adverse action will be taken against employees or applicants who discuss pay.

Post specific language prescribed by OFCCP in conspicuous places available to applicants and employees.

Include the language prescribed by OFCCP in employee manuals or handbooks.

Notice Regarding Availability of Affirmative Action Plans

Make applicants and employees aware that the affirmative action plans produced for individuals with disabilities and protected veterans are available for inspection.

Union Notification

Notify unions of the employer's obligations under the federal affirmative action laws and regulations.

Contract and Purchase Order Language

Include an equal opportunity clause prescribed by OFCCP in all contracts and purchase orders with suppliers and vendors who provide products and services necessary to the completion of a federal contract.

Notification to Suppliers and Vendors

Send notification of the employer's EEO policy to suppliers and vendors who provide products and services necessary to the completion of a federal contract.

Policies and Procedures

EEO Policy Statement

Have an equal employment opportunity policy statement that shows the support of the employer's top U.S. executive.

Post the EEO policy on company bulletin boards and other locations where it can be seen by applicants and employees.

Harassment

Develop and implement procedures to prevent harassment based on any classification protected under the federal affirmative action laws and regulations.

Record Keeping

Retain Records

Retain all records relating to personnel actions and decisions. These records must generally be retained for at least two (2) years.

Record Retention Regarding Disability and Protected Veteran Outreach

Retain documentation of activities associated with outreach to recruit individuals with disabilities and protected veterans for three (3) years.

Medical Records

Maintain medical records on separate forms and in separate files from other personnel records.

Accommodation

Disability Accommodation

Provide reasonable accommodation to individuals with disabilities and disabled veterans when requested to do so by an applicant or employee.

Accommodation with Application Process

Provide reasonable accommodation with the application process when requested to do so by an applicant who is an individual with a disability or a disabled veteran.

Religious Accommodation

Provide reasonable accommodation to applicants and employees who request accommodation for religious observances or practices.

Reports

EEO-1 Report

File the annual EEO-1 report with the Equal Employment Opportunity Commission.

VETS Report

File the annual report on protected veterans required by the Veterans Employment and Training Service (VETS).

Other Actions

Designation of EEO Official

Designate an official of the employer who is responsible for the implementation of the employer's affirmative action programs.

Allow Access to Records and Facilities

Give the federal government access to records and facilities during affirmative action compliance reviews and equal opportunity investigations.

Audit and Reporting Systems

Establish audit and reporting systems that measure the effectiveness of affirmative action programs.

Review of Compensation Systems

Evaluate compensation systems on an annual basis to determine whether these systems are resulting in any disparities involving race, ethnicity, or sex.

Membership Fees

Avoid paying for corporate or personal memberships in private clubs or other organizations that restrict membership on the basis of race, color, religion, sex, or national origin.

Review of Personnel Practices

Conduct a review of personnel practices on an annual basis to ensure these personnel practices provide employment opportunities to applicants and employees who are individuals with disabilities or protected veterans.

Review of Physical and Mental Qualifications

Periodically review all physical and mental job qualifications to ensure these qualifications do not artificially screen out individuals with disabilities or protected veterans.

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Training

Provide training to all personnel involved in the recruitment, selection, and oversight of employees to ensure that the employer's affirmative action plans for individuals with disabilities and protected veterans are properly implemented.

Medical Examinations and Inquiries

Limit medical examinations of applicants or employees.