



IMPLEMENTATION CHECKLIST FOR THE MARCH 24, 2014, OFCCP REGULATIONS FOR INDIVIDUALS WITH DISABILITIES AND VETERANS

NEW OBLIGATIONS AS OF MARCH 24, 2014

- Ensure that all EEO notices and postings are accessible to applicants and employees.
- Post appropriate employee notices regarding employee rights and Company's obligations to take affirmative action.
- Ensure that job seekers applying electronically are provided an opportunity to view the "EEO is the Law" poster during the application process. Providing a link to the poster will suffice.
- If applicable, notify unions representing employees at any site that the Company is an equal opportunity/affirmative action employer and request their cooperation. Maintain documentation of this notice.
- Ensure the appropriate equal opportunity clause is included in purchase orders and subcontracts for goods and services necessary to the performance of a government contract. Note: language must be in bold font and different language is required for subcontracts/purchase orders of \$10,000 or more (Disability) and of \$100,000 or more (Veterans).
- Include specific EEO language in job advertisements that all applicants will receive consideration for employment regardless of disability or protected veteran status (at a minimum: "Veterans" & "Disabled").
- Ensure all relevant policies, handbooks, forms, and AAPs contain appropriate veterans' categories.
- List all appropriate employment openings with workforce agencies in each state in which the contractor has openings and determine the manner in which the agencies expect to receive these job postings. Note: internal openings, those lasting three days or less, and executive/senior management positions need not be posted with state workforce agencies.
- Provide each state workforce agency with notice that the Company is a federal contractor and request priority referral of protected veterans. Provide the name and location of each hiring location within the state, contact information for the hiring official and for job search companies used in the hiring process. Update this information with the state workforce agency should any of this information change. Maintain documentation of the information provided to each state workforce agency (**three years** if contractor has more than 150 employees and **two years** if contractor has less than 150 employees).

NEW OBLIGATIONS AS OF THE BEGINNING OF THE FIRST AAP CYCLE AFTER MARCH 24, 2014

- Send written notification to subcontractors and vendors that the Company is an affirmative action employer and request appropriate action on their part. Maintain documentation of notices sent.
- Establish "good faith" file for each AAP location and use it as the repository for all outreach and targeted recruiting efforts.
- Review on-line application process to ensure that it contains information on how individuals with a disability (IWDs) can seek reasonable accommodation to participate in the application or interview process.
- Post affirmative action policy statement which includes information on how applicants and employees may view the IWD AAP (without metrics) and which must be signed by the Company's Chief Executive Officer. The policy statement

Please note that OFCCP continually updates its guidance on the veterans and disability regulations.
Visit <http://www.dol.gov/ofccp/regs/compliance/faqs/offaqs.htm> for updates.

For questions or comments please contact OFCCPInfo@ogletreedeakins.com.



should be posted on employee bulletin board and on the Company's intranet. If applications are taken in person at any site, the policy statement must be posted at that location.

- Begin inviting applicants to self-ID for IWD and veteran status at the same time they are invited to self-ID for gender and race/ethnicity. Use OFCCP-approved form for IWD self-ID.
- Invite individuals who have received a job offer to self-ID for IWD and veteran status. Use OFCCP-approved form for IWD self-ID.
- Invite each employee to self-ID for IWD status the first year after the IWD regulations are effective and every five years thereafter. Use OFCCP-approved form for IWD self-ID.
- Invite each employee to self-ID for IWD status between the first year that the IWD regulations are effective and the fifth year. Use OFCCP-approved form for IWD self-ID.
- Establish a schedule for evaluating whether personnel procedures or practices screen out IWDs and/or veterans. Assign responsibility for evaluation and corresponding documentation of the review.
- Establish a schedule for reviewing all physical and mental job qualifications to ensure accuracy, job-relatedness, and consistency with business necessity. Assign responsibility for the evaluation and corresponding documentation of review.
- Issue/re-issue to employees any Company policies covering non-discrimination and prohibiting unlawful harassment. The policies must specifically cover IWDs and veterans and include a complaint procedure for employees who believe that they have been subjected to discrimination or harassment. Maintain documentation of distribution to employees.
- Develop and implement a training program for managers, recruiters, and personnel involved in making compensation decisions, covering equal opportunity employment, affirmative action principles, responding to complaints of unlawful discrimination and/or harassment, and the reasonable accommodation process. Establish a procedure for training newly hired/promoted managers, recruiters, and personnel involved in making compensation decisions. Maintain documentation of training content and attendance roster.
- Establish and implement a process for collecting and maintaining for **three years** the following data by AAP establishment:
 - Number of applicants who self-ID as IWDs or veterans
 - Total number of job openings and total number of jobs filled
 - Total number of applicants
 - Total number of IWDs hired
 - Total number of veterans hired
- Establish 8% hiring benchmark per AAP establishment for veterans¹ and develop targeted recruiting and outreach for veterans not currently in the Company's workforce. Assign responsibility for recruiting and outreach and maintaining documentation of efforts.
- Establish 7% utilization goal per job group at each AAP establishment for IWDs and develop targeted recruiting and outreach for IWDs. Assign responsibility for recruiting and outreach and maintaining documentation of efforts.
- Formalize the process for analyzing the overall effectiveness of IWDs and veterans outreach and recruiting efforts by establishment, with an assessment occurring at least at the end of each AAP year and preferably at six-month intervals.
- At the end of the AAP year, evaluate the overall effectiveness of IWD/veteran outreach and targeted recruiting efforts. If the evaluation leads to the conclusion that the overall effort has not been effective, develop a remedial plan and assign responsibility for implementation.
- Establish **three-year** record retention schedule for IWD/veteran data collection, IWD/veteran outreach and targeted recruiting, and assessment of the effectiveness of the overall efforts to recruit and employ IWDs/veterans.

¹ If the Company elects to establish its own benchmark for veteran hiring, the Company must document the factors it considered in arriving at that benchmark.