

Do You Want to See the Report That an OFCCP Compliance Officer Must Complete on Your Audit Before It Can Be Closed?

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- list any complaints filed against the employer during the review period with other federal enforcement agencies (such as the U.S. Equal Employment Opportunity Commission, the Wage and Hour Division of the U.S. Department of Labor, or the Occupational Safety and Health Administration) and the status of those complaints;
- identify data submission problems;
- identify “EEO trends” in minority and female representation in the employer’s workforce at the audited location (be on the lookout for a forthcoming article on this topic on the Affirmative Action /OFCCP blog) and explain any negative trends;
- evaluate the employer’s good faith efforts under Executive Order 11246;
- determine whether the employer has implemented the Sex Discrimination Guidelines and the Guidelines on Discrimination Because of Religion and National Origin;
- pinpoint problem areas for investigation;
- evaluate the contractor’s compliance with the technical requirements of Executive Order 11246, Section 503 of the Rehabilitation Act, the Vietnam Era Veterans Readjustment Assistance Act, and Executive Order 13496 (requiring notice of employee rights under the National Labor Relations Act);

- describe any problems found during the audit, including a discussion of the nature of the problem, relevant evidence reviewed, and actions (if any) taken to resolve the problem; and
- prepare a case summary and recommendations for appropriate corrective action, if necessary.

OFCCP's 2013 update of the Federal Contract Compliance Manual includes a fillable copy of the SCER. The SCER includes illustrative examples of the kind of information the CO would insert into the report to complete the section as well as an "Instructions" section providing guidance to the CO on the report.

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TOPICS

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