

Federal Contractors and Subcontractors Top 10 Affirmative Action Checklist

Labor & Employment Law Update

By Heather Bailey on January 25, 2016

Any federal government contractor or subcontractor can testify to how much work really goes into complying with Affirmative Action obligations. Here is just a quick, non-exhaustive checklist to highlight many of your affirmative action to-dos:

1. Are you "listing" your job openings with the nearby unemployment agencies?
2. Are you asking your job applicants to self-identify their gender, race, veteran status and whether they are disabled or not?
3. Are you asking those individuals that you have given an offer of employment to self-identify again their veteran status and whether they are disabled or not?
4. Did you perform your annual compensation review to determine any pay disparities among employees in the same job groups and titles?
5. Did you file your EEO-1?
6. Did you file your VETS-4212 form?
7. Did you update and post your affirmative action policy statement for employees and applicants to see?
8. Did you have a refresher course with management and those employees in charge of hiring on the importance of affirmative action and their obligations in hiring and managing the workforce?
9. If you are a contractor who hires subs to work on federal government work, did you include the requisite EEO and affirmative action compliance language in your agreement with your sub?
10. Did you update your annual affirmative action plan?

It's best to seek guidance from your employment labor counsel to ensure you are in compliance with all affirmative action requirements. Waiting until the OFCCP audit letter comes may be too late.