

5-Step Checklist to Executing and Proving Your Good Faith Efforts

Did you know? The most common OFCCP violation is the failure to keep proper records. Start tracking your Good Faith Efforts (GFEs) effectively with these five tips:



1

Make Fully Action-Orientated Plans

The first step to developing a robust affirmative action strategy is to create action-oriented plans that ensure success:

- ☐ Do your plans cover the whole talent lifecycle, from recruitment to selecting candidates for internal mobility?
- ☐ Do your plans describe:
 - ☐ Every action that needs to be taken?
 - ☐ The individuals responsible?
 - ☐ Projected dates for when each task will be accomplished?
- ☐ Are your plans specific about the actual jobs you're looking to fill, and the specific actions your hiring team will take?
- ☐ Have you kept track of your GFEs and shown how each step will lead to an increase in participation?

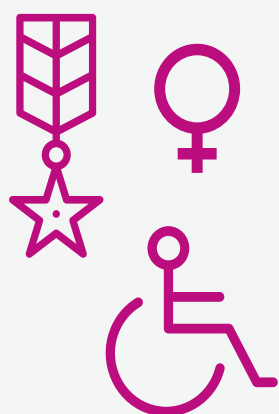


2

Proving GFEs In Job Postings

The OFCCP requests that organizations provide detailed information on their recruiting sources:

- ☐ Is your company career site accessible for people with disabilities?
- ☐ Do you give clear instructions for how individuals can request accommodations if they need further assistance to apply for a position?
- ☐ Do you keep an accurate and up-to-date log of where your job openings are posted?
- ☐ Does your log list:
 - ☐ The protected group on which the source is focused?
 - ☐ The contact information for the source?
 - ☐ The distribution date?
- ☐ Are you focused on results rather than number of sources?
- ☐ Can you prove that your sources and methods provide measurable results?



3

Improving Succession Planning With GFEs

GFEs aren't just about recruiting new hires. Many in the four protected groups—females, minorities, veterans, and individuals with disabilities—struggle to advance once hired:

- ☐ Do you reexamine internal processes when protected groups consistently fail to appear in lists of candidates eligible for promotion?
- ☐ Do you help to address skill gaps by providing:
 - ☐ Appropriate training and development opportunities?
 - ☐ Mentorships and peer learning?
 - ☐ Tuition reimbursement?
- ☐ Do you post jobs internally so that all employees are aware of open positions and the skills they need?



4

Fairer Compensation via GFEs

To be OFCCP compliant, you must ensure that everyone who's in any given job—at similar levels of skill, effort, and responsibility—is paid similarly.

- ☐ Have you created and adhered to strict guidelines that determine the pay level for which a person is hired?
- ☐ Do you have a formal performance appraisal system or merit-based pay system that determines raises and bonuses?
- ☐ Are your performance evaluations tied to objective, measurable factors such as dollar value of sales, or volume of consumer complaints?



5

Use Turnover to Inform Your Good Faith Efforts

Employee turnover and termination provide crucial insights into the company's AAPs and how employees view them:

- ☐ Do you use your exit interviews to shed light on any potential problems impacting the company's GFEs?
- ☐ Do you monitor for high turnover among certain groups and record reasons such as harassment, or lack of opportunities for growth?

For a full look at the importance of Good Faith Efforts, the things you have to do to execute and prove their success, read our guide:

The Why, How, and What of Good Faith Efforts

Click the title to download today or head to affirmity.com/resources