

OFCCP Audit Response Checklist

The audit cycle begins with a pre-audit notification. The OFCCP will inform your organization that it's getting ready to send you a letter regarding audit activity. Follow the points in this checklist and you'll always know what to do and when in the audit cycle it needs to be done.



1

Always-On Actions

Have you:

- Ensured that your AAP analysis for each year is accurate and drives actions?
- Performed outreach that is always intentional, tracked, and evaluated?
- Run steps analysis whenever adverse impact is uncovered, giving you insight into where certain groups fall out in the process?
- Analyzed compensation annually?
- Truly got to know your program and your data?
- Reviewed your narrative to ensure you're doing what you say?
- Periodically reviewed applicant pools for diversity?
- Periodically reviewed your processes, including personnel decisions/accommodations/pay/etc. and documented the review?

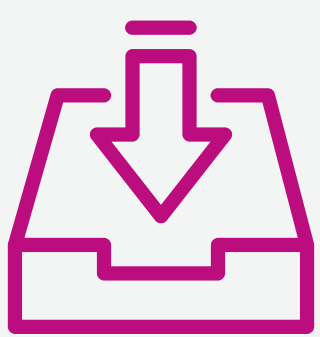


2

When You Receive Your Scheduling Letter

Have you:

- Notified the team? Your internal and external stakeholders need to know that audit activity is incoming.
- Contacted the OFCCP compliance officer in the letter and introduced yourself as the point of contact?
- Begun reviewing the data and analysis to ensure accuracy? Particularly, have you considered:
 - Employee data, ensuring it matches the numbers in your Job Group Analysis (JGA)?
 - Applicant data?
 - Historical data, identifying where you have adverse impact or other indicators on the reports? And, do you understand the answers to these?
- Considered the bits of data you do not need to submit as well? Remember, a surplus of information can make the OFCCP officer's task harder than it needs to be!



3

When Preparing Your Final Submission

Have you:

- Identified the submission items clearly for the compliance officer?
- Reviewed information under item 19 to ensure that the totals match your job group analysis (JGA) totals? Remember, data pulled from different groups often derail this section.
- Accounted for accommodation request items for the review period?
 - Can you explain your accommodation policy?
 - Do you have documentation proving that employees know how to get access to accommodations if needed?
- Included an account of outreach for the review period (items 7, 8, 11, and 12)?
- Relied on your consultant where needed throughout the process?

For a comprehensive look at the auditing process and some fantastic expert advice drawn from years of responding to OFCCP requests, read our guide:

OFCCP Audits: How to Prepare and Respond

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