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6 OFCCP Audit-Ready Actions for Your Applicant Data

Applicant processes can make or break federal contractor compliance, and record-keeping violations are among the most common issues uncovered by OFCCP audit activity. Make sure your organization is following non-discriminatory best practices by observing these six audit-ready actions:

1 Do You Have Compliant Applicant Tracking in Place?

- Both your processes and your systems need to be fit for purpose.

2 Are You Reviewing Your Applicant Pools and Verifying That Dispositioning Is Complete?

- Avoid analyzing applicants that shouldn't even be in your analysis.

3 Have You Reviewed Your Organization's Applicants-to-Hires Analysis?

- Make sure you do it before you submit information to the OFCCP!
- Be proactive: prepare to explain *why* any adverse impact exists, and *how* you plan to address it—better still, address the impact before an OFCCP audit ever happens.

4 Did You Identify Whether Additional Reviews Are Necessary?

- You may need to run an impact ratio analysis by job title or requisition, or run a steps analysis.
- The "counts" report you submit along with your audit must be defensible and must ideally account for areas of statistical significance.

5 Are Recruiters and Hiring Managers Trained on Your Application Process?

- Make sure they know their compliance obligations.
- Impress upon them the critical role they play in maintaining your organization's federal contracts.

6 Have You Fully Documented Your Hiring Process?

- You'll be asked to present this during an audit—and you'll have to demonstrate that your organization is following the processes it describes.

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