

# Survey of Federal Contractors on Effective Assessment of Outreach and Recruitment Efforts for Individuals with Disabilities and Protected Veterans

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## DISCLAIMER

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This report is not intended to provide specific legal advice. One of the important themes throughout this report is that context matters, and that the lawyer, consultant, or practitioner should consider several factors when conducting assessments of outreach. For this reason, the information in this report should not be viewed as legal advice. Instead, the information presented in this report should be viewed as a general set of best practices that may or may not appropriately generalize to specific situations. Legal advice depends on the specific facts and circumstances of each individual situation. Those seeking specific legal advice or assistance should contact an attorney as appropriate.

The results and corresponding recommendations are presented in the aggregate. No respondent can be explicitly linked to a particular opinion, perspective or recommendation. Survey results were anonymous. This report includes best practices at a particular point in time. All data were collected in 2014 and 2015. As such, any changes in EEO statute, scientific literature, and trends in actual practice after 2015 are not captured in this report.

The information presented in this report is not a criticism of the policies or procedures of any federal agency, specific court rulings, or research from the scholarly literature. Instead, this report includes recommendations for best practices for outreach and recruitment in the field.

## ACKNOWLEDGEMENTS

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## ABOUT DCI CONSULTING

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**DCI CONSULTING GROUP, INC.** is a human resources consulting firm strategically located in Washington, D.C. DCI provides in-depth consulting in a wide range of HR areas, including systemic compensation discrimination analyses, affirmative action plan development and implementation, employee selection and test validation, OFCCP audit and litigation support, and regulatory affairs and government relations. DCI also provides clients with sophisticated affirmative action and salary equity software. DCI's clients represent a cross-section of industries, including aerospace and defense, financial services, pharmaceuticals, high technology, communications and manufacturing. DCI also works directly with national law firms to provide related litigation defense services.

All of DCI's consultants have advanced degrees in Industrial/ Organizational (I/O) Psychology or a related discipline. I/O psychologists are uniquely qualified to understand the intersection of work and human behavior, as they are trained to evaluate employment decision-making, work performance, and organizational behavior using rigorous methods consistent with the scientific method. In addition, I/O Psychologists have expertise in statistics, psychometrics, and job performance measurement. For these reasons I/O Psychologists are usually trained to evaluate employment decision-making, work performance measurement, and organizational behavior using the rigor of the scientific method, and are often involved in the development, evaluation, and validation of employee selection systems used to make decisions related to hiring, promotion, termination, pay and other employment outcomes.

Strategically located in Washington DC, DCI is continuously informed of all pending and recent changes to regulations, ensuring the most up-to-date consulting for our clients. As a recognized leader in the industry, DCI assists companies in every stage of compliance. With vast knowledge of the different strategies utilized at all OFCCP levels, DCI can help assure a smooth compliance review or prepare technically compliant affirmative action plans, AAP trainings and pay equity trainings.



## SUMMARY

Recent changes to regulations involving individuals with disabilities (IwDs) and protected veterans have placed a heightened focus on efforts taken by federal contractors to attract and retain qualified members of these protected groups. Specifically, revisions to Section 503 of the Rehabilitation Act and the Vietnam Era Veterans' Readjustment Assistance Act (VERAA) have expanded upon existing obligations of general outreach and now require contractor tracking and assessment of individual efforts as part of a formal outreach evaluation. Options for tracking and/or uploading information about outreach and recruitment efforts are now available from a variety of sources, including a sample tracking document provided by OFCCP. However, the criteria to consider when evaluating the effectiveness of individual efforts still seem to be unclear for many. In light of the regulatory revisions and lack of guidance surrounding the evaluation requirement, DCI Consulting Group (DCI) conducted a survey of contractor representatives to determine whether or not best practices for fulfilling new obligations have manifested within the community. It is important to note that this survey was designed specifically to address contractor efforts in evaluating outreach and recruitment within the context of affirmative action for IwDs and protected veterans and was not developed to address contractor compliance with revised requirements in a general sense.

Survey participants included 77 representatives of federal contractor organizations varying in size and spanning a cross-section of industries. Results indicated that many contractors do not consider the regulatory-mandated metrics (when considered alone) to be useful for assessing the effectiveness of outreach and recruitment efforts. Further, only a portion of contractors indicated they would find utility in the mandatory requirement to list jobs with the state Employment Service Delivery Systems (ESDS) for purposes of attracting and recruiting protected veterans.

Results indicated that contractors consider several quantitative metrics to be useful in assessing outreach effectiveness for IwDs and protected veterans. These include measuring the increase in qualified applicants, hires, and/or overall employment of members of these protected groups. Contractors also indicated utility in measuring quantitative outcomes of individual recruitment resources. For instance, assessing return on investment for specific resources (e.g., number of protected group hires referred from source in comparison to the cost of utilizing the source) was identified as an important yet challenging strategy for evaluating the success of outreach efforts.

In addition, contractors also identified several outcomes of a more qualitative nature for consideration within the assessment which included: the intrinsic value of maintaining partnerships with disability and veteran organizations; establishing goodwill by attending community events or building brand recognition; and the value of upholding partnerships with industry-specific recruitment organizations. Interestingly, qualitative measures were often cited as an action-oriented item that would be useful after a quantitative evaluation of outreach efforts occur in an organization. As a result, several respondents also listed action- or improvement-oriented evaluation outcomes as qualitative in nature, including: implementing new, industry-relevant recruitment sources into the annual affirmative action program; seeking out recruitment efforts that are more targeted to the organization's specific objectives; removing or reducing use of ineffective recruitment sources; increasing visibility in new areas and communities; and determining appropriate outreach and recruitment strategies based upon results from applicant and/or hiring analytics.

## REVIEW OF REGULATORY REQUIREMENTS

On March 24, 2014, regulatory revisions impacting federal contractors and subcontractors went into effect under Section 503 of the Rehabilitation Act of 1973 (Section 503) and the Vietnam Era Veterans' Readjustment Act (VEVRAA). One new requirement established under revisions to both Section 503, protecting individuals with disabilities (IwDs), and VEVRAA, protecting certain categories of veterans (protected veterans), is a first-time obligation to formally evaluate the effectiveness of efforts taken in outreach and recruitment of protected group members.

Specifically, Section 503 and VEVRAA now require contractors to conduct an annual review of outreach and recruitment activity occurring over the preceding 12 months (henceforth "the evaluation") to determine the overall success of efforts in identifying and recruiting qualified IwDs and protected veterans. For each effort, contractors must document the criteria used in the evaluation and the conclusion regarding the effort's effectiveness. If contractors conclude the totality of efforts were not effective, alternative efforts must be identified and implemented. See [Appendix A](#) for the exact language from the regulatory text.

The addition of this requirement falls squarely in line with the mantra often repeated by Director Shiu of the Office of Federal Contractor Compliance Programs (OFCCP): "What gets measured gets done" (Vitas, 2012; Shiu, 2013; Shiu, 2014). In other words, the intent behind the new requirement is to create accountability for long-standing outreach and recruitment obligations through critical examination of the methods used to engage these populations. Under the revised requirements, contractors must now demonstrate that changes have been made to improve overall outreach effectiveness if the current efforts have been deemed ineffective.

In spite of the implied intent, the regulatory language used to describe the requirement is not entirely congruent with the purposes of determining the effectiveness of efforts both individually and as a whole. Specifically, the regulations require contractors to use a set of mandatory applicant and hiring data as minimum criteria for the evaluation. Though most contractors currently have only one year of the required data, the evaluation requires contractors to incorporate up to three years of data as it becomes available. The required data for each year (pursuant to 41 C.F.R. §60-300.44(k) and 41 C.F.R. §60-741.44(k) and shown in [Appendix A](#)) consists of the following metrics (collectively referred to as the "44(k) analytics"):

- total number of applicants,
- total number of IwD/protected veteran applicants,
- total number of hires,
- total number of IwD/protected veteran hires,
- total number of job openings, and
- total number of jobs filled.

There are several concerns regarding the suitability of these metrics for use as minimum criteria within the evaluation:

1. Data is tracked and reported at the establishment level; for this reason, using the metrics as evaluation criteria is potentially inappropriate in cases where the effects of efforts are likely far removed from establishment-level applicant and hiring data (e.g., large-scale outreach efforts). Also, establishment-level data does not lend itself to assessing potential barriers at the more granular level of Affirmative Action Job Group, as required where underutilization is identified (41 C.F.R. §60-741.45(e)(f)).
2. Veteran applicant and hiring data reflects only those veterans identifying with one or more categories protected under VEVRAA, whereas most veteran recruitment sources are designed to target all veterans. Therefore, required data will likely under-represent the total number of veterans recruited via veteran outreach efforts.
3. Due to extremely low response rates in self-identification of disability status via the OFCCP-proscribed form, the required data will likely under-represent actual recruitment of IwDs resulting from outreach efforts.
4. Data on job openings and jobs filled provides no useful index of information for evaluation.
5. Quantitative applicant and hiring records maintained in the system cannot be easily linked to certain efforts (e.g., marketing the organization as an ally of IwDs and veterans).

In light of shortcomings with evaluation criteria required by the regulations, contractors must develop and share their own best practices for conducting the evaluation. To that end, this white paper will examine current methods for assessing outreach within the contractor community in addition to considerations and lessons learned in conducting the required evaluation.

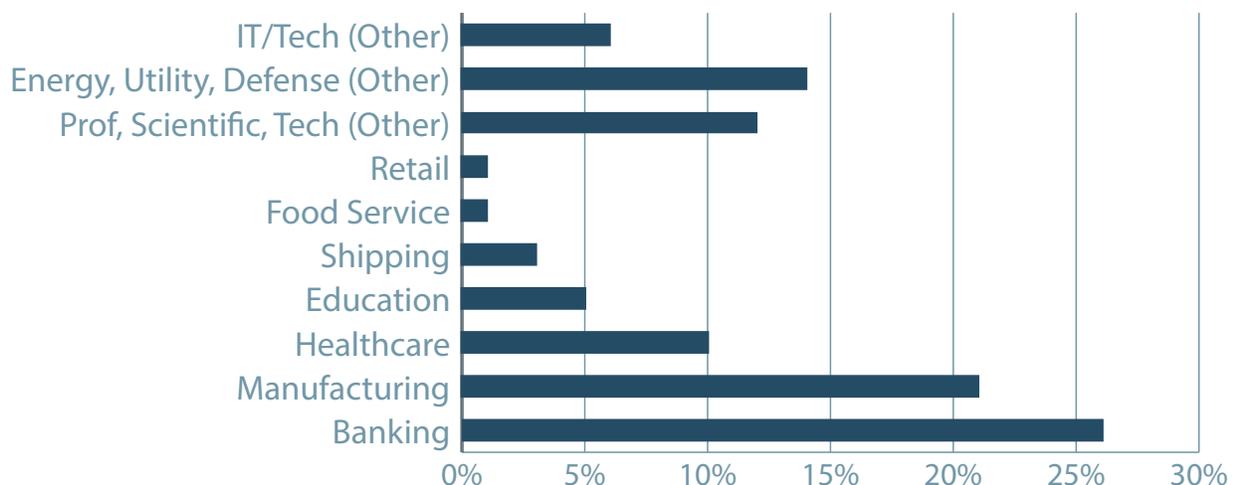
## SURVEY METHOD

The survey, which was developed and disseminated through the Survey Monkey ([www.surveymonkey.com](http://www.surveymonkey.com)) platform, included a total of 11 items and was estimated to take approximately 15 minutes to complete. Contractor participation was encouraged through a blog post distributed via [www.diconsult.com/blog](http://www.diconsult.com/blog), which provided a link to the survey and a short description of the purpose of the research. Upon opening the link, individuals were directed to a screen informing that participation was voluntary, that any data collected would be maintained confidentially, and results would be reported anonymously at the aggregate level. Additionally, participants were provided with the language taken from Section 503 and VEVRAA outlining the requirement on evaluating external outreach and recruitment effectiveness. See [Appendix B](#) to view the information included in the pre-survey memo to participants. See [Appendix C](#) for the complete list of survey questions and response options.

### **Participant Demographics**

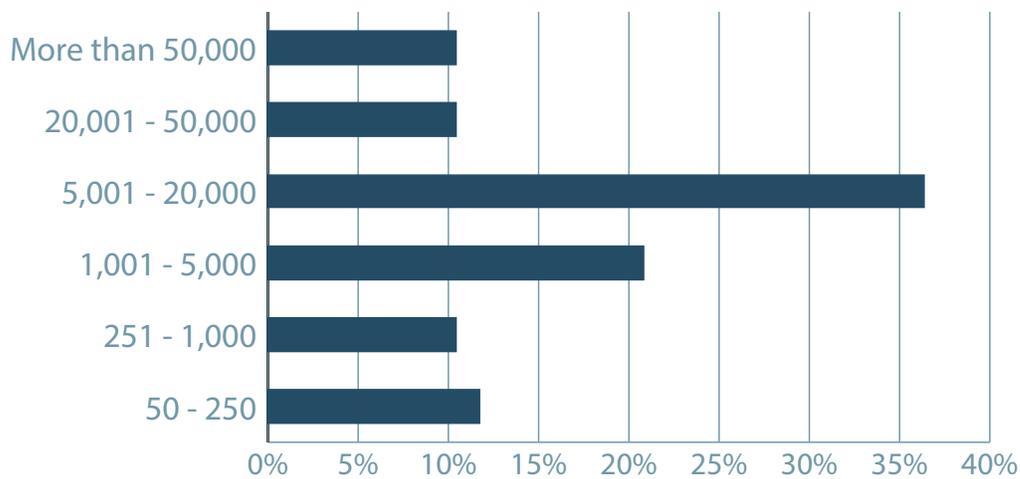
A total of 77 federal contractor representatives participated in the survey; however, all respondents did not provide feedback on all 11 items, as only those items assessing participant demographics were required. Participants represented contractors operating within a wide range of industries. Of the respondents, approximately 26% (20 of 77) represented the banking industry, approximately 21% (16 of 77) represented the manufacturing industry, and approximately 14% (11 of 77) represented an organization within the energy, utility, or defense industry. See Figure 1 below for the percentage of participants representing each industry. Additionally, participants represented organizations maintaining both establishment-based affirmative action plans (AAPs) and functional affirmative action plans (FAAPs). Although the majority of participants (approximately 84%) indicated maintaining an establishment-based AAP, approximately 9% indicated maintaining a FAAP. The remaining respondents (approximately 6%) indicated that they were not sure whether they maintained an establishment-based AAP or a FAAP.

Figure 1. Survey Respondents by Industry

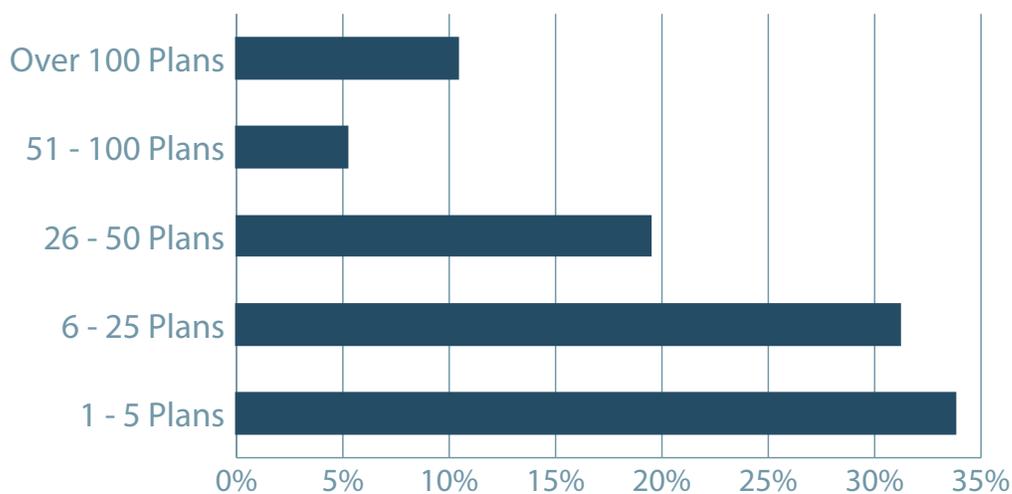


Participants represented contractors of varying size and complexity in terms of both the number of employees and the number of annual AAPs maintained by the organization. Although the majority of contractors fell somewhere in the middle in terms of employment numbers, both small and large companies were represented with approximately 12% employing 250 or fewer employees and approximately 10% employing more than 50,000 employees. See Figure 2 for the percentage of respondents who indicated employment numbers within each range. In terms of the number of annual plans maintained, the majority of participants (approximately 65%) indicated maintaining 25 or fewer annual AAPs. On the opposite end of the spectrum, a little more than 10% of participants (8 of 77) indicated maintaining more than 100 annual plans. Figure 3 below provides an overview of the number of annual AAPs maintained by the contractors surveyed.

**Figure 2. Number of Employees in Participant Organizations**



**Figure 3. Number of Plans Maintained by Participant Organizations**



## SURVEY RESULTS

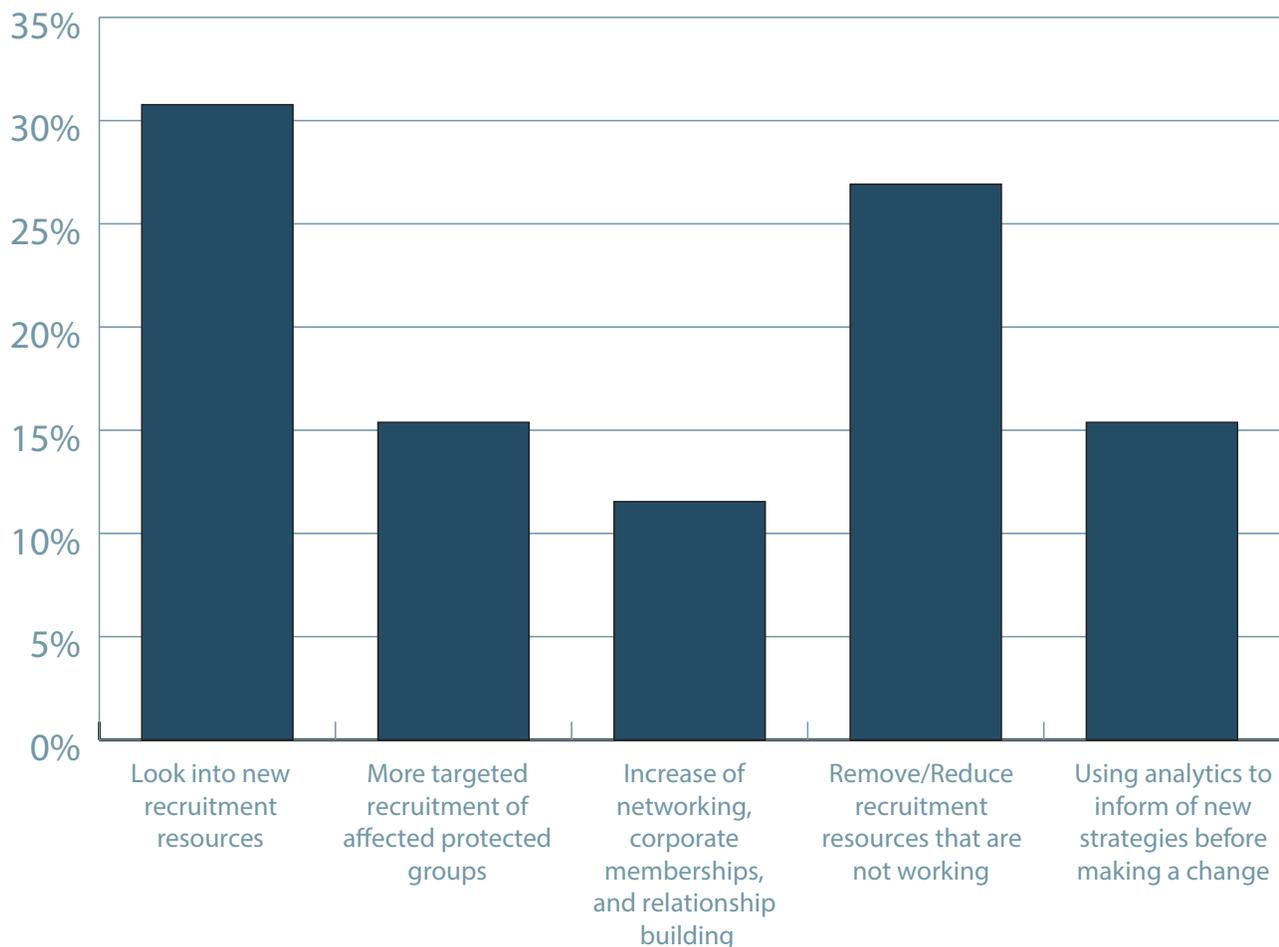
Survey items represented three major themes, which are organized and discussed separately below: 1) Contractor methods used to voluntarily evaluate external outreach and recruitment efforts *prior to the revised requirements* (Pre-Regulatory Methods for Evaluating Outreach); 2) Methods contractors intended to use for evaluating external outreach and recruitment efforts *once revised requirements became effective* (Post-Regulatory Methods for Evaluating Outreach); and 3) Methods contractors intended to use for evaluating progress toward achieving the VEVRAA hiring benchmark *once revised requirements under VEVRAA became effective* (Post-Regulatory Methods for Evaluating the Veteran Benchmark).

### ***Pre-Regulatory Methods for Evaluating Outreach***

Prior to identifying future strategies for compliance with the new obligations, DCI sought to assess contractors' current methods for evaluating external outreach and recruitment activities. Specifically, participants were asked to indicate whether or not their organization currently evaluates the success of outreach and recruitment efforts for protected group members. Of those who responded to this item, approximately 58% (43 of 74) indicated that their organization currently does not conduct an evaluation of this nature. Conversely, approximately 42% (31 of 74) responded affirmatively to this item, indicating that their organization does currently evaluate outreach and recruitment efforts for protected groups.

Participants who responded affirmatively to this item were further prompted to indicate whether or not the results of evaluations were used to make changes to outreach and recruitment efforts. Approximately 66% of these participants indicated that the outcome of current evaluations do result in changes to outreach and recruitment efforts. When asked to describe the specific types of changes made, the respondents provided a total of 26 examples which fell into five major categories: exploring new recruitment resources; implementing recruitment efforts that are more targeted in nature; building relationships; removing or reducing ineffective recruitment resources; and using analytics to guide efforts. Figure 4 shows the percentage of responses falling under each of the major categories identified. The types of changes described the most frequently of those provided involved exploring new recruitment resources (mentioned in 31% of responses) and removing or reducing ineffective resources (mentioned in 27% of responses).

Figure 4. Changes to External Efforts Resulting from Outcome of Current Evaluations



### ***Post-Regulatory Methods for Evaluating Outreach***

After providing feedback on current organizational methods for assessing outreach/recruitment of protected groups, participants responded to several items assessing future plans for compliance with the new requirements to evaluate efforts involving IwDs and protected veterans. A total of 67 participants responded to an item assessing the types of criteria that contractors planned to use within the evaluation. Participants were instructed to review a list of 12 potential criteria that could be of interest to contractors in completing the evaluation (e.g., increase in qualified IwD/protected veteran applicants, increase in IwD/protected veteran job seekers). Respondents then selected all criteria from those listed that their organizations planned to use within the evaluation. Figure 5 presents the percentage of respondents who indicated intent to utilize each criterion. The criteria endorsed most frequently by participants were as follows: an increase in protected veteran hires (79.1% endorsed); an increase in IwD hires (76.1% endorsed); and an increase in the overall employment percentage of IwDs (73.1% endorsed). An increase in the overall employment percentage of protected veterans as well as an increase in the number of qualified protected veteran applicants were both endorsed by 71.6% of respondents. Only slightly more than half of the respondents (52.2%) indicated plans to incorporate a review of the 44(k) analytics in the evaluation, and only 19.4% of respondents indicated plans to use the number state workforce priority referrals (i.e., number of veterans referred to organization as result of compliance with VEVRAA job listing requirement).

Participants also provided feedback on the types of outcomes that may lead to the conclusion that an organizational effort was *not successful*. A total of 52 participants completed this item, which required respondents to provide descriptive examples of outcomes that might lead to the conclusion that efforts were not successful. Of the examples provided, those most frequently noted involved a *lack of qualified or increase in unqualified IWD/protected veteran applicants* (noted in approximately 31% of responses) and a *lack of IWD/protected veteran hires* (noted in approximately 26% of responses). Figure 6 displays all outcomes included in participant responses and the percentages associated with each.

Figure 5. Potential Criteria for Evaluating Success of External Outreach Efforts

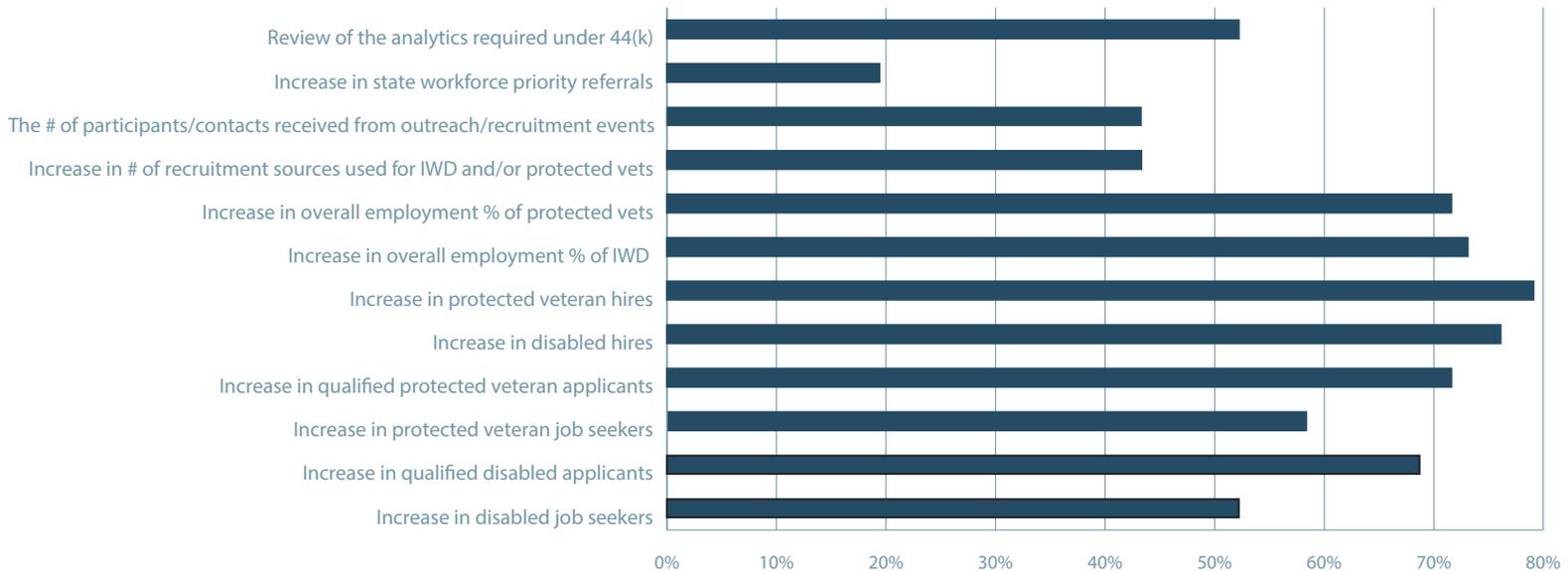
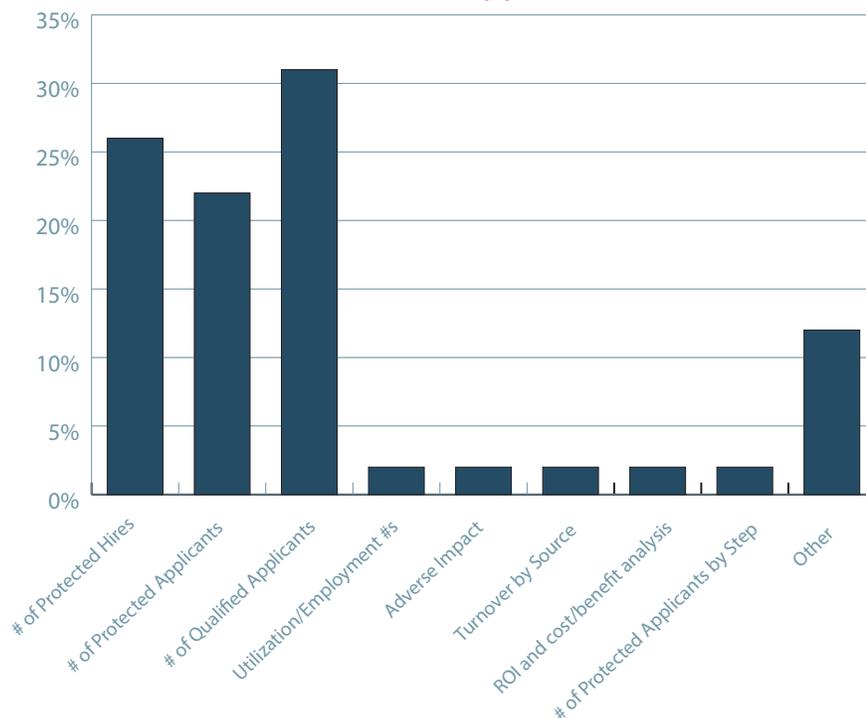


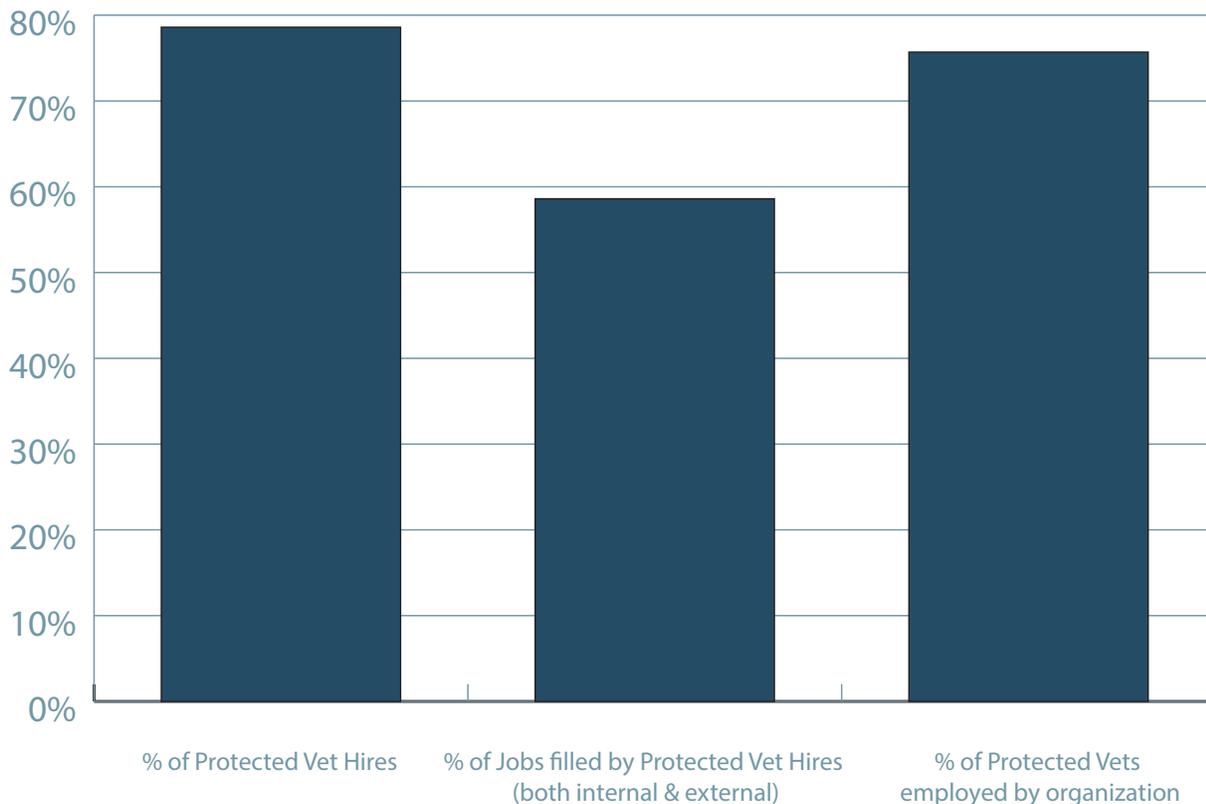
Figure 6. Potential Outcomes to Support Conclusion that Effort(s) are NOT Successful



## Post-Regulatory Methods for Evaluating the Veteran Benchmark

In addition to assessing the criteria and outcomes that contractors intended to consider in evaluating external outreach and recruitment efforts, the survey also assessed those criteria that contractors planned to use in determining progress toward achieving the VEVRAA hiring benchmark. Participants were instructed to select all metrics of those listed that their organizations planned to consider in assessing progress against the veteran benchmark. Metrics listed were as follows: the percentage of protected veteran hires; the percentage of jobs filled by protected veterans; and the percentage of protected veterans employed by the organization. Of the 70 participants who responded to this item, the majority indicated the intent to evaluate both the percentage of protected veteran hires (78.6%) and the percentage of protected veterans employed by the organization (75.7%) in assessing progress toward the VEVRAA hiring benchmark. Although fewer respondents indicated plans to evaluate the percentage of jobs filled by protected veterans, over half of respondents (58.6%) also identified this as a criterion that they intended to include in the assessment. Results are displayed in Figure 7 below.

Figure 7.  
Potential Criteria for Assessing Progress  
Toward VEVRAA Hiring Benchmark



## DISCUSSION

As evidenced by survey results, additional metrics above and beyond the required 44(k) analytics will likely be useful for contractors in evaluating the effectiveness of external outreach and recruitment efforts for the IwD and protected veteran populations.

### ***Measuring Outreach and Recruitment Effectiveness – Quantitative***

When considering useful factors to include within the evaluation, respondents identified a number of criteria of a quantitative nature that may help inform conclusions regarding the success of annual outreach and recruitment. One noteworthy finding was that some respondents indicated plans to consider, through the advisement of legal counsel, the use of adverse impact analyses comparable to those used to analyze race/ethnicity and sex within the EEO context. It should be noted, however, that results of an adverse impact analysis would not yield useful information for evaluating external outreach and recruitment efforts in compliance with affirmative action outreach obligations. In the realm of EEO discrimination analytics, adverse impact analyses for race/ethnicity and sex are required by the Uniform Guidelines on Employee Selection Procedures (41 CFR § 60-3) and are useful in answering questions related to group differences in selection rates. Specifically, adverse impact metrics are designed to determine if a seemingly neutral personnel process (e.g., personality test, background check) is having a significantly disproportionate effect on members of one protected group in comparison to another. Adverse impact analyses do not, however, answer questions regarding the effectiveness of organizational outreach and recruitment efforts. In order to answer questions on the effectiveness of outreach efforts, it is prudent to examine recruitment and placement data and the results yielded from recruitment resources. Further, the utility or feasibility of conducting adverse impact analytics is questionable within this context. This is especially the case when considering adverse impact measurement within the IwD population. Some current thought leaders in the field have expressed that, within the context of the IwD population, conducting adverse impact analytics is not even a feasible task (Gutman, 2015; Colosimo, Grauer, Gutman, Reddock, Schmidt, & Wilson, 2015). For example, consider running an analysis on differences between individuals with diabetes vs. non-diabetics, or individuals with epilepsy vs. non-epilepsy. Specific information related to the type of disability should be highly confidential (41 CFR § 60-741.23(d)) making the data required for this type of analysis practically unattainable. In addition, because data collected via the mandated disability form is dichotomous in nature (i.e., disabled or not disabled), adverse impact analyses, which require data of a much more granular level, would not be possible. Furthermore, results from this analysis would not provide useful information for evaluating outreach and recruitment efforts.

Results indicate that federal contractors and proactive organizations may find utility in considering metrics such as increases in applicants and hires (both overall and by recruitment resource) when assessing outreach and recruitment effectiveness. Effective evaluations may also involve assessing the return on investment for specific recruitment resources to ensure they are yielding quality IwD and protected veteran hires.

### ***1. Increases in Applicants and Hires Overall***

As discussed in the survey results, the majority of respondents indicated that metrics such as increases in qualified applicants and hires from both the IwD and protected veteran populations would be useful in evaluating the effectiveness of efforts throughout the organization or within

a location. Because this information is now being tracked and maintained under new regulatory requirements, contractors should have little trouble incorporating applicant and hires data into the evaluation (much of this information is already used in developing Affirmative Action Plans). One important take-away gleaned from survey responses is that contractors noted *overall* increases in applicants and hires as a useful measure for groups of interest. The required 44(k) analytics tie required metrics to an establishment level; however, the survey results imply organization-wide protected class applicant and hire increases may be useful, particularly for assessment of organization-wide outreach and recruitment efforts. Additionally, it is important to note that respondents indicated a higher likelihood of using data related to *qualified applicants*, rather than *job seekers*.<sup>1</sup>

## **2. Increases in Overall Employment Percentages**

Many respondents also indicated that metrics such as increases in overall employment of IwDs and protected veterans would be useful in evaluating the success of external outreach and recruitment efforts. Interestingly, OFCCP regulations require an annual evaluation of employment percentages for IwDs; however this is not a required assessment for protected veterans. Therefore, survey results suggest there may be some confusion among contractors when interpreting obligations under the VEVRAA hiring benchmark as compared to the analysis under Section 503. Of the 70 participants who responded to the survey item inquiring about plans for evaluating the hiring benchmark, the majority indicated the intent to evaluate both the percentage of protected veteran hires (78.6%) *and* the percentage of protected veterans employed by the organization (75.7%). Thus, contractors may find use in assessing trends in protected veteran employment when measuring the overall effectiveness of veteran outreach, however this is not a regulatory requirement. Furthermore, discussions amongst federal contractors have indicated that many expect to find utility in assessing data on the entire veteran population (both protected and non-protected) to align with organizational objectives of inclusion.

## **3. Increases in Applicants and Hires by Recruitment Source**

Narrative responses from the survey indicated that many contractors are interested in tracking source specific information related to the number of qualified applicants and placements received from veteran and disability recruitment resources. However, some contractors cite challenges with data tracking and maintenance in larger organizations (especially those with centralized applicant tracking systems), making this a difficult task.

Challenges cited involve the number of recruitment resources used across a company and insufficient bandwidth to include all resources in a “drop-down” box for candidates to select the appropriate referral source within the application process. Many HR professionals working in larger organizations have concerns that including an exhaustive list of options under candidate referral sources will create a tedious and possibly negative application experience for job seekers. Some solutions to this concern may include displaying only the most global and frequently used veteran and IwD recruitment resources in the drop-down list or encouraging more regional or localized tracking of source information.

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<sup>1</sup> “41 CFR part 60-1 Obligation to solicit race and gender data for agency enforcement purposes”, released by the Department of Labor, Office of Federal Contract Compliance Programs, October 7, 2005 differentiates the terms “internet applicant” and “job seeker” for analysis and recordkeeping purposes. Specifically, “job seeker” is the broad term used to identify any individual who expresses an initial interest in a position. An “internet applicant,” by contrast, must express interest, be considered for the position, meet the basic qualifications, and not withdraw interest at any point prior to an offer.

In addition, there is an increase in the number of vendors purporting to be able to provide accurate source data for applicants being routed to a job posting from various online sourcing sites. However, it is also important to note that several narrative responses indicated that some recruiters hold negative attitudes regarding outreach and recruitment reporting (e.g., viewing as a time-consuming task that does not yield meaningful results).

#### **4. Return on Investment By Recruitment Source**

In some cases, concerns were noted regarding the value achieved by efforts in comparison to the cost (i.e., time and money) of implementation. To this regard, several narrative responses cited use of a return on investment (ROI) review for resources yielding IwDs and protected veterans. These metrics incorporate the dollar value associated with use of a recruitment resource along with the number of quality applicants or placements yielded from the resource. From there, ROI can be used to inform value-based decisions regarding the organization's current use of recruitment resources (e.g., acceptable cost per placement yielded). Further, some organizations are assessing the turnover rate as an additional metric to assure that the IwD or protected veteran placement was in fact a long-term successful addition to the organization. For example, if all protected veterans placed into an organization from a particular resource only chose to stay with the organization for an average of 3 months, the organization may conclude that, ultimately, little value was obtained from these placements. Essentially, assessing the turnover rates of IwDs and protected veterans from certain sources will help inform the conclusion as to whether the resource was worth the organization's investment.

#### **5. The use of Disability Employment Tabulation Metrics**

The final revised regulation for Section 503 requires contractors to conduct a utilization analysis for the IwD population using a 7% availability figure, regardless of job group or location. This is different than the methodology required for establishing availability estimates for minorities and females. However, the Disability Employment Tabulation data published by the Census Bureau is available for public use and provides availability estimates that can be used to evaluate utilization of IwDs in a manner more similar to the process used for minorities and females. The census tabulation can be accessed at: <http://www.census.gov/people/disabilityemptab/>. Contractors may consider conducting additional analytics from the Disability Employment Tabulation data. The results of such analytics would be more diagnostic than comparisons against the required 7% utilization goal, as the requisite skills calculation will give a truer estimate of the percentage of IwDs available for each job group and location. Therefore, comparing these estimates against employment will yield a more realistic evaluation of the effectiveness of the contractor's affirmative action program in employing IwDs. The information could also be useful in assessing the applicant flow to determine whether or not representation of IwDs within the applicant pool reflects the availability of IwDs within the recruitment area(s).

## ***Measuring Outreach and Recruitment Effectiveness – Qualitative***

It was clear from several narrative responses that quantitative metrics, although useful and necessary in evaluating the effectiveness of outreach and recruitment efforts, should not be used alone in the evaluation. Results indicate that qualitative assessments, in conjunction with quantitative measures, still prove to be useful and important to many organizations. Specifically, qualitative measures were often cited as an action-oriented item that would be useful for implementing after quantitative criteria/outcomes are evaluated by the organization. Some of the qualitative assessments noted included the following: the intrinsic value of maintaining partnerships with disability and veteran organizations; establishing goodwill by attending community events or building brand recognition; and the value of upholding partnerships with industry-specific recruitment organizations.

### ***1. Fostering goodwill in the community and brand recognition***

Many survey respondents noted the intrinsic value in including efforts within the review even where results are not directly quantifiable (e.g., fostering relationships within the IWD and veteran communities). For instance, enabling employees to represent the organization by volunteering at a regional Special Olympics event, helping translate military experience onto a resume for veterans, or even donating to the Wounded Warrior project are viewed as effective means through which organizations can build relationships and create brand recognition. Although these types of activities may not be directly quantifiable as evidence of outreach and recruitment effectiveness, the goodwill established between the organization and the community should be considered a valuable and relevant outcome within the evaluation.

### ***2. Industry or job specific recruiting resources and comparisons***

Some survey respondents indicated utility in assessing the breadth of industry-specific resources and partnerships as part of the assessment of outreach. In some industries and some geographic locations, the availability of IWDs and protected veterans may be markedly different. In these instances, reviewing data sources that provide information to compute industry-or geographic-specific comparisons may be more useful to determine the effectiveness of outreach and recruitment efforts. Utilizing data sources such as the American Community Survey (ACS), which captures information on disability status, to compare employment percentages of jobs within similar industries, may be a useful starting place in evaluating an organization's outreach and placement efforts for certain types of positions. For example, if an analysis using ACS data shows a 1% IWD population within an organization's industry and geographic location, it may be unrealistic to expect a higher percentage of referrals within the IWD population in light of estimated availability. Conversely, if a recruitment resource is referring the IWD population at a rate of 7% for positions in an industry and geographic location where availability is estimated to be 20%, the contractor may not be getting as many IWD referrals as would be expected given the ACS data.

## CONCLUSION

The purpose of the survey was to gain an understanding of the usefulness of methods for assessing the outreach and recruitment efforts of federal contractors subject to Section 503 and VEVRAA. Survey results indicate that only about half of respondents (52.2%) planned on utilizing the required 44(k) analytics to determine the success of outreach and recruitment efforts for IwDs and protected veterans. However, other metrics, such as assessing overall increases in hires, applicants, and employment percentages for these populations are more likely to be utilized by federal contractors to evaluate outreach effectiveness. Furthermore, non-traditional and non-required approaches such as those involving data from individual recruitment resources, ROI analytics, additional data sources, and values-based judgments regarding partnerships are also likely to be useful tools for evaluating contractor efforts. Finally, only 19.4% of participants indicated organizational plans to utilize the required state workforce priority referrals within the evaluation.

Part of the spirit of the revised Section 503 and VEVRAA regulations was to require federal contractors to strengthen their outreach and employment of the IwD and protected veteran populations (OFCCP, 2013a, pp. 58614; OFCCP, 2013b, pp.58683). In fact, OFCCP Director Patricia Shiu is often quoted saying “What gets measured, gets done” in connection with the revised 503 and VEVRAA regulations (Vitas, 2012; Shiu, 2013; Shiu 2014). Survey results indicate, however, that some of the evaluation metrics required under the regulations have less utility than others in assessing outreach to the IwD and protected veteran populations. Results highlight several additional metrics (both evaluation criteria and effort outcomes) that are not required by the regulations but that contractors find useful in achieving desired EEO results for IwD and protected veteran populations. However, it is important to note that the revised regulations, at the very least, have encouraged data collection and increased visibility around creating meaningful metrics and efforts for the IwD and protected veteran populations.

Results clearly indicate that contractors have already identified multiple options for incorporating meaningful qualitative and quantitative metrics that go well above and beyond those required by the regulations. As contractors begin conducting these evaluations, further methods will be identified in this area. Specific practices have been discussed previously, but general themes for those truly seeking to pave a ‘best practice’ model will include linking applicants and actions to the sources that routed them. In addition, qualitative outcomes will be integrated with the quantitative metrics to help create a holistic review. Finally, the requirement to consider multiple years of analysis can in fact provide a more robust assessment of the effectiveness of individual recruitment and outreach sources over time, limiting the potential for a single year’s results to overly influence the assessed effectiveness of a source. Even effective sources may vary in effectiveness from year to year.

In conclusion, best practices for conducting an effective evaluation under the revised Section 503 and VEVRAA are in the making. As contractors work to implement the new requirement, best practices will be established within the community through sharing of lessons learned and ideas for achieving success.

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# APPENDIX A

## REGULATORY TEXT

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### Implementing Regulations for Section 503 of the Rehabilitation Act of 1973

60-741.44(f)(3) *Assessment of external outreach and recruitment efforts.* The contractor shall, on an annual basis, review the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities. The contractor shall document each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and the contractor's conclusion as to whether each effort was effective. Among these criteria shall be the data collected pursuant to paragraph (k) of this section for the current year and the two most recent previous years. The contractor's conclusion as to the effectiveness of its outreach efforts must be reasonable as determined by OFCCP in light of these regulations. If the contractor concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, it shall identify and implement alternative efforts listed in paragraphs (f)(1) or (f)(2) of this section in order to fulfill its obligations.

60-741.44(k) *Data collection analysis.* The contractor shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The number of applicants who self-identified as individuals with disabilities pursuant to §60-741.42(a), or who are otherwise known to be individuals with disabilities;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of applicants with disabilities hired; and
5. The total number of applicants hired.

## Implementing Regulations for the Vietnam Era Veterans Readjustment Assistance Act of 1974

60-300.44(f)(3) *Assessment of external outreach and recruitment efforts.* The contractor shall, on an annual basis, review the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans. The contractor shall document each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and the contractor's conclusion as to whether each effort was effective. Among these criteria shall be the data collected pursuant to paragraph (k) of this section for the current year and the two most recent previous years. The contractor's conclusion as to the effectiveness of its outreach efforts must be reasonable as determined by OFCCP in light of these regulations. If the contractor concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, it shall identify and implement alternative efforts listed in paragraphs (f)(1) or (f)(2) of this section in order to fulfill its obligations.

60-300.44(k) *Data collection analysis.* The contractor shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The number of applicants who self-identified as protected veterans pursuant to §60-300.42(a), or who are otherwise known as protected veterans;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of protected veteran applicants hired; and
5. The total number of applicants hired.

# APPENDIX B

## MEMO TO SURVEY PARTICIPANTS

## MEMO TO SURVEY PARTICIPANTS

In light of recent revisions to Section 503 and VEVRAA regulations, there will be increased emphasis on contractor efforts to effectively attract qualified individuals with disabilities and protected veterans. Contractors have voiced questions and concerns on tracking and evaluating the success of these efforts. Due to the ambiguity of the word “effective” set forth in the regulations, DCI is engaging the contractor community in a brief survey to understand how contractors consider the effectiveness of outreach and recruitment efforts and to share best practices. DCI will release information gathered through this survey in a future blog release and a white paper issued as a shared reference. Thank you in advance for participating in this survey. It will take approximately 15 minutes to complete, and all responses will be maintained confidentially. Results will be released in an anonymous manner. Thank you.

See below for the Section 503 and VEVRAA requirement on the assessment of external outreach and recruitment efforts:

The contractor shall document each evaluation, including at a minimum the criteria it used to evaluate the effectiveness of each effort and the contractor’s conclusion as to whether each effort was effective. Among these criteria shall be the data collected pursuant to paragraph (k) of this section for the current year and the two most recent previous years. The contractor’s conclusion as to the effectiveness of its outreach efforts must be reasonable as determined by OFCCP in light of these regulations. If the contractor concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans/individuals with disabilities, it shall identify and implement alternative efforts listed in paragraphs (f)(1) or (f)(2) of this section in order to fulfill its obligations.

# APPENDIX C

## CONTRACTOR SURVEY QUESTIONNAIRE

# CONTRACTOR SURVEY QUESTIONNAIRE

**1. Please select the industry of your organization.**

Banking \_\_\_\_\_ Education \_\_\_\_\_ Food Service \_\_\_\_\_  
 Healthcare \_\_\_\_\_ Manufacturing \_\_\_\_\_ Retail \_\_\_\_\_  
 Shipping \_\_\_\_\_ Other (Please Specify) \_\_\_\_\_

**2. Does your organization maintain an establishment-based affirmative action plan (AAP) or a function affirmative action plan (FAAP)?**

Establishment-Based AAP \_\_\_\_\_ FAAP \_\_\_\_\_ Not Sure \_\_\_\_\_

**3. Please indicate the number of annual plans maintained by your organization.**

1-5 Plans \_\_\_\_\_ 6-25 Plans \_\_\_\_\_ 26-50 Plans \_\_\_\_\_  
 51-100 Plans \_\_\_\_\_ More than 100 Plans \_\_\_\_\_

**4. Please indicate an estimate of the number of employees within your organization.**

50-250 Employees \_\_\_\_\_ 251-1,000 Employees \_\_\_\_\_  
 1,001-5,000 Employees \_\_\_\_\_ 5,001-20,000 Employees \_\_\_\_\_  
 20,001-50,000 Employees \_\_\_\_\_ More than 50,000 Employees \_\_\_\_\_

**5. Does your organization currently evaluate the success of its outreach and recruitment efforts undertaken to recruit protected groups?**

Yes \_\_\_\_\_ No \_\_\_\_\_

**6. Please answer if you responded "Yes" to question 5. Does your organization make changes to outreach and recruitment efforts in response to the evaluation? If so, please describe.**

Yes (Please Describe) \_\_\_\_\_ No \_\_\_\_\_

**7. Please select all of the following that your organization plans to utilize in evaluating the success of external outreach and recruitment efforts.**

Increase of disabled job seekers \_\_\_\_\_  
 Increase of qualified disabled applicants \_\_\_\_\_  
 Increase or protected veteran job seekers \_\_\_\_\_  
 Increase of qualified protected veteran applicants \_\_\_\_\_  
 Increase of disabled hires \_\_\_\_\_  
 Increase of protected veteran hires \_\_\_\_\_  
 Increase in the overall employment % of individuals with disabilities \_\_\_\_\_  
 Increase in the overall employment % of protected veterans \_\_\_\_\_  
 Increase in the # of recruitment resources used for individuals with disabilities and/or protected veterans \_\_\_\_\_  
 The # of participants/contacts received from outreach and recruitment events \_\_\_\_\_  
 Increase in state workforce priority referrals \_\_\_\_\_  
 A review of the analytics required under 44(k) (e.g., number of job openings, number of jobs filled) \_\_\_\_\_  
 Other (Please Specify) \_\_\_\_\_

**8. Please provide several examples of outcomes that might lead your organization to determine that an outreach and recruitment effort was UNSUCCESSFUL (e.g., no candidates selected for hire from a good faith effort).**

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**9. Please select all of the following that describe the information that your organization plans to evaluate in determining whether or not it has met the protected veteran "hiring benchmark."**

Percentage of protected veteran hires \_\_\_\_\_

Percentage of jobs filled by protected veterans (external & internal selections) \_\_\_\_\_

Percentage of protected veterans employed by the organization \_\_\_\_\_

Other (Please Specify) \_\_\_\_\_

**10. Please select the option(s) below that best represent your organization's interest in utilizing services from DCI to assist you in compliance with the assessment of outreach and recruitment portion of the new regulations.**

Interest in using a database tool for storage and maintenance of documents relating to outreach and recruitment efforts \_\_\_\_\_

Interest in acquiring reports assessing the effectiveness of outreach and recruitment efforts for proactive affirmative action purposes \_\_\_\_\_

Interest in acquiring reports assessing the effectiveness of outreach and recruitment efforts for EEO audit purposes \_\_\_\_\_

No interest at this time in using services from DCI for future compliance with this new portion of the regulations \_\_\_\_\_

Other (Please Specify) \_\_\_\_\_

**11. Please share any other information that you feel may be an important consideration when engaging in outreach for protected veterans and individuals with disabilities, measuring success of outreach, and responding to OFCCP inquiries during a compliance review.**