



AAP Compliance Checklist

Implementing the Affirmative Action Plan

Compliance Item	Responsible Party	Progress and Notes
AAP & Compensation Reports		
<input type="checkbox"/> Completed technically compliant Minority/Female Affirmative Action Plans and held AAP review/close-out meeting	DCI	
<input type="checkbox"/> Reviewed AAP to determine areas of underutilization.	DCI and HR/Compliance	<i>To complete after AAP is delivered</i>
<input type="checkbox"/> Designed action-oriented programs to correct any identified underutilization (e.g. recruitment source).	HR/Compliance/Talent Acquisition	<i>To complete after AAP is delivered</i>
<input type="checkbox"/> Executed action-oriented programs (e.g. company-sponsored community outreach) based upon goals identified in AAP.		<i>To complete after AAP is delivered</i>
<input type="checkbox"/> Maintained documentation of ALL good faith efforts: such as proof of job fair(s) attendance, meetings/events with diverse community organizations, etc. <ul style="list-style-type: none"> • Ensure process documents activities, dates, key personnel involved, and notes about effectiveness by suggested completion date 	Talent Acquisition	
<input type="checkbox"/> Reviewed entire AAP to determine if there are areas of statistical differences.	DCI and HR/Compliance	<i>To complete after AAP is delivered</i>
<input type="checkbox"/> <i>[if statistical differences are found]</i> Conducted research to determine legitimate non-discriminatory reasons (e.g. evaluate selection process).	HR/Compliance	



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<input type="checkbox"/> Ensured tests have been validated for jobs as defined in the Uniform Guidelines on Employee Selection Procedures (UGESP) (if there is a statistical indicator). <ul style="list-style-type: none"> Initial step is to determine which positions utilize selection tests 	HR/Compliance	
<input type="checkbox"/> Reported findings to key stakeholders involved in employment decisions.	HR/Compliance	<i>To complete after AAP is delivered</i>
<input type="checkbox"/> Reviewed compensation analysis report for potential problem areas (<i>conduct additional research and make adjustments as needed</i>).	HR/Compliance/Comp/Legal	
Job Postings		
<input type="checkbox"/> Placed external job openings with state/local employment offices. This does not include any openings that are for Executive or Senior Manager positions, internal-only positions, or positions that will last 3 days or less. <ul style="list-style-type: none"> Confirm state office has the contact information for the contractor official responsible for hiring at each location and that they know you are a federal contractor that desires priority referrals of veterans. 	Talent Acquisition	
<input type="checkbox"/> Implemented outreach and recruitment efforts for protected veterans and individuals with disabilities .	Talent Acquisition	



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<input type="checkbox"/> Advertised how employees and/or applicants can request needed accommodations (e.g. “If you are a person with a disability needing assistance with the application process, please call xxx-xxx-xxxx”) <input type="checkbox"/> Confirmed website is accessible for individuals with disabilities	HR/Compliance/Talent Acquisition	
Applicant Tracking/Recruiting		
<input type="checkbox"/> Developed/implemented procedures in compliance with the Internet applicant regulation .	HR/Compliance/Talent Acquisition	
<input type="checkbox"/> Trained all recruiters and hiring managers on EEO and record-keeping.	HR/Compliance	
<input type="checkbox"/> Periodically audited applicant data to confirm compliance (e.g. proper use of disposition codes, record-keeping of applications, etc.).	HR/Compliance/Talent Acquisition	
Self-Identification of Protected Status		
<i>Organization is required to solicit this voluntary information from Internet applicants (i.e., pre -and post-offer for 503/VEVRAA) and employees</i>	Talent Acquisition	
<input type="checkbox"/> Solicited EEO-1 race/ethnicity categories and gender <input type="checkbox"/> Engaged in visual identification when <u>employees</u> (not applicants) choose not to self-identify.	HR/Compliance	
<input type="checkbox"/> Solicited protected veteran status.	Talent Acquisition	
<input type="checkbox"/> Solicited disability information using the OFCCP mandated language. (41 CFR 60-741.42) <input type="checkbox"/> Sent reminder that employees may update disability status at any time at least once between official solicitations for disability.	HR/Compliance	



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<input type="checkbox"/> Solicited employee disability status at least every 5 years.		
<input type="checkbox"/> Confirmed self-id forms are separate from actual application (e.g., “tear-off sheets”). <ul style="list-style-type: none"> <input type="checkbox"/> For analysis purposes, demographic details and employment record connected through a unique identifier (i.e., applicant ID). <input type="checkbox"/> Confirmed disability related self-identification data are stored in a confidential “data analysis file” 	Talent Acquisition	
Equal Opportunity Clause		
<input type="checkbox"/> Confirmed equal opportunity clause included in all government contracts and purchase orders. <ul style="list-style-type: none"> <input type="checkbox"/> Confirmed citation to 41 CFR 60-1.4(a). <input type="checkbox"/> Confirmed citation to 41 CFR 60-300.5(a) and inclusion of the following language, in bold text, after the citation. <input type="checkbox"/> Confirmed citation to 41 CFR 60-741.5(a) and inclusion of the following language, in bold text, after the citation. <input type="checkbox"/> Confirmed citation to 29 CFR part 471, appendix A to subpart A. 	Procurement/HR/Compliance/Legal	
Required Postings		
<input type="checkbox"/> Confirmed solicitations for employment include EEO tagline with references for protected veteran and disability status.	HR/Talent Acquisition HR/Talent Acquisition	



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<p>Tagline example: “EOE/Minority/Female/Veteran/Disabled/Sexual Orientation/Gender Identity” on all employment advertising (including company careers site and any external websites and advertisements). <i>Note:</i> there are variations of this statement all in which Veterans and Disabled must be spelled out. (effective 4/2015 under EO 13672 must specify sexual orientation and gender identity)</p>		
<p><input type="checkbox"/> Confirmed that labor unions were notified of affirmative action and nondiscrimination obligations, and provided EEO/AA Policy.</p>	HR/Compliance	
<p><input type="checkbox"/> Confirmed EEO Is the Law, EEO is the Law Supplement, EO 13496, and Pay Transparency Nondiscrimination Provision are prominently displayed in the “common areas” of ALL AAP locations/facilities and is provided in a format that is “accessible and understandable” to individuals with disabilities and protected veterans.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ensure that employees working remotely have access to the “EEO is the Law” poster and supplement electronically. <input type="checkbox"/> Ensure that the “EEO is the Law” poster and “Pay Transparency provision” are electronically available (i.e. linked) with the employment application. <p><input type="checkbox"/> Confirmed other federal and/or state employment posters are displayed as required: https://www.dol.gov/general/topics/posters</p>	HR/Compliance	
Accommodation Process		
<p><input type="checkbox"/> Confirmed reasonable accommodations are provided to ensure individuals with a disability have equal access to personnel processes.</p>		



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<input type="checkbox"/> Contractors are <i>encouraged</i> to develop written procedures for processing requests for accommodation for disabled applicants/ employees.	HR/Compliance	
AAP Policy Statement		
<input type="checkbox"/> Confirmed Affirmative Action Policy Statement was sent to all subcontractors, including vendors, and requested cooperation. <input type="checkbox"/> Recent changes to AAP policy statement include: (1) cite CEO's (or the most senior U.S. executive's) support, (2) address AAP audit and reporting system, (3) assign overall responsibility for the AAP implementation, and (4) state the company will recruit, hire, train and promote and ensure all other personnel actions are administered without regard to protected veteran/disability status.	HR/Compliance	
<input type="checkbox"/> Confirmed Affirmative Action Policy Statement posted for employees in the "common areas" of ALL AAP locations/facilities and is provided in a format that is "accessible and understandable" to individuals with disabilities and protected veterans. <input type="checkbox"/> Ensure the company AAP policy is either in the policy manual or otherwise made available to employees.	HR/Compliance	
Self-Assessment and Internal Auditing		



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<input type="checkbox"/> Confirmed periodic assessment of existing personnel processes to determine whether they screen out qualified individuals with disabilities or protected veterans (include description of review in AAP).	HR/Compliance	<i>Immediate review necessary; require ongoing review</i>
<input type="checkbox"/> Confirmed periodic review of all physical and mental job qualifications to ensure any qualifications that eliminate applicants are job-related and consistent with business necessity.	HR/Compliance	
<input type="checkbox"/> Confirmed documentation of the actions taken to comply with audit and reporting requirements, including: <ul style="list-style-type: none"> <input type="checkbox"/> Measured effectiveness of AAP; need for remedial action; and attainment of objectives. 	HR/Compliance	
<input type="checkbox"/> Confirmed annual assessment of each protected vet/lwD outreach and recruitment activity was documented; maintain for 3 years. <ul style="list-style-type: none"> <input type="checkbox"/> Criteria used for evaluation must include data collected per 60-300/741.44(k) and must include conclusion about effectiveness. 	Talent Acquisition	
Additional Items		
<input type="checkbox"/> Confirmed applicant tracking is collecting number protected Vet/lwD applicants, total number of job openings, total number of jobs filled, total number of applicants, number protected Vet/lwD applicants hired, and total number of applicants hired.	Talent Acquisition	<i>DCI AAP reports will capture this information</i>
<input type="checkbox"/> Confirmed process is in place to maintain above-mentioned records for 3 years.	HR/Compliance/Talent Acquisition	



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<input type="checkbox"/> Confirmed all other records (electronic or paper) concerning employment decisions are retained for at least two years. Note: obligation is one year for organizations with less than 150 employees or a government contract of less than \$150,000. (<i>41 CFR 60-1.12; 60-300.80(a); 60-741.80(a)</i>)	HR/Compliance	
<input type="checkbox"/> Delivered training to all recruitment and selection personnel on compliance and AA/EEO policies and practices.	HR/Compliance	
<input type="checkbox"/> Delivered up-to-date training to all managers on protected class harassment and related policies.	HR/Compliance	
<input type="checkbox"/> Review Pay Transparency compliance (DCI will provide checklist)	HR/Compliance	
<input type="checkbox"/> Review and ensure compliance with Sex Discrimination Guidelines	HR/Compliance	