



Recordkeeping Checklist

Highlights of the OFCCP Recordkeeping Requirements

- Develop and maintain Affirmative Action Programs (AAPs) and documents of good faith efforts for the current and preceding AAP years.
 - Executive Order 11246 – race, color, religion, gender, and national origin
 - Section 503 of the Rehabilitation Act – persons with disabilities
 - 38 U.S.C. 4212 – recently separated, disabled, Armed Forces Service Medal, and other protected veterans
- Maintain personnel activity data, personnel decisions, and support documentation (applicant flow, hires, promotions, transfers, terminations, assignments, demotions, compensation determinations, job descriptions, etc.) by race and gender for a minimum of two years. If your organization has fewer than 150 employees or does not have at least \$150,000 in contracts, data must be maintained for a minimum of one year from the date that the personnel decision was made.
- Conduct annual disparity analyses of personnel activity data (applicant flow, hires, promotions, and terminations). Maintain records related to the analyses of the impact of employment practices, procedures, and tests (PPT) used in selection processes.
- Preserve all personnel records relevant to complaints, compliance evaluations, or enforcement actions until final disposition has been reached.
- List specific employment openings and provide additional identifying information on the job opening to the appropriate employment service delivery system (ESDS) and maintain records documenting the activities.
- Maintain a list of requests for accommodation for individuals with disabilities. Indicate results of the decisions made for each request (i.e., when approved, indicate what type of accommodation was provided or, when not approved, indicate the reason why it was not approved).
- File EEO-1 reports with the Joint Reporting Committee and retain evidence that the reports have been filed. Employers with 100 employees or more must also report on summary pay data by gender and race within 12 pay categories.
- File VETS 4212 reports with the U.S. Department of Labor’s Office of Veterans’ Employment and Training Service and maintain records of this activity.
- Maintain Employment Eligibility Verification Forms (Form I-9).
- Post “EEO is the Law” poster in a conspicuous place.
- Post prescribed employee notices in plants and offices where employees who are covered by NLRA perform contract-related activities.
- Document outreach and recruitment efforts. Maintain documentation evaluating recruitment and outreach efforts.
- Post policy statement that the AAP for veterans and individuals with disabilities are available for review.