

Compliance Check List for Workplace Affirmative Action Programs

This document provides a general overview of federal contractor obligations related to equal employment opportunity and affirmative action (EEO/AA). The information below is presented by contract value and total employee population.

At \$10,000+, contractors must:

- Not discriminate.
- Include the Equal Opportunity Clause in each nonexempt subcontract.
- Include the EEO tag line in all job advertisements.
- Display the EEO poster in employee work spaces.
- Maintain employment and applicant records for one year.
- Invite applicants to self-identify race/ethnicity and gender.
- Allow OFCCP access if requested.
- Provide reasonable accommodations to applicants and employees with disabilities upon request.
- Comply with the Uniform Guidelines on Employee Selection Procedures.

At \$50,000+ and 50 employees, contractors must:

- Complete all of the above requirements.
- File EEO-1 reports annually.
- Develop and maintain a written affirmative action plan for minorities and women (M&W).
- Require qualifying subcontractors to develop and maintain a written M&W.

At \$100,000+ and 50 employees, contractors must:

- Complete all of the above requirements.
- Develop and maintain a written affirmative action plan for veterans and individuals with disabilities (V&D).
- Invite all applicants and employees to self-identify veteran and disability status.
- Post all positions with the state employment service except for (1) executive positions, (2) positions that will be filled internally, and (3) temporary positions lasting three days or less.
- File VETS-4212 report annually.

At \$50,000+ and 100 employees, contractors must:

- Complete all of the above requirements.
- Test employment activity data for disparate impact.

At \$50,000+ and 150 employees, contractors must:

- Complete all of the above requirements.
- Maintain employment records for two years. (Required for contractors with either 150 employees or more than \$150,000 in contract value.)
- Develop job groups beyond EEO-1 job categories.

Simplifying Compliance — one sample at a time