OFCCP Releases Corporate Scheduling Announcement List, Audits Coming Soon

By Laura A. Mitchell March 27, 2019

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Affirmative Action, OFCCP and Government Contract Compliance Government Contractors Technology The Office of Federal Contract Compliance Programs (OFCCP) has publicly released its first Corporate Scheduling Announcement List (CSAL) of 2019 on its website on March 25. There are 3,500 establishments on this CSAL. The CSAL advises employers of the company locations targeted for OFCCP audits of their Affirmative Action Program (AAP).

Departing from previous practice, OFCCP will not send notification letters directly to federal contractors. Instead, the agency should have provided email notices to all contractors who have subscribed to OFCCP's <u>email updates</u>.

While the CSAL does not guarantee an audit or initiate the beginning of an OFCCP audit, OFCCP may begin issuing Scheduling Letters (the official notice of a compliance review and the beginning of the 30-day deadline to submit AAPs) after 45 days.

After scheduling just 1,700 compliance reviews in 2018, OFCCP appears ready to accelerate the pace, selecting 3,500 establishments subject to review in 2019. Included in these reviews are:

- 1,208 unique companies
- 2,345 Establishment Compliance Reviews
- 500 Compliance Checks
- 500 Section 503 Focused Reviews
- 83 CMCEs
- 72 FAAP functional units

In keeping with OFCCP Director Craig Leen's pledge for increased transparency, the agency has published a <u>complete explanation of its scheduling methodology</u>.

In addition, employers are awaiting OFCCP's first round of <u>Section 503 Focused Reviews</u> (unveiled in OFCCP <u>Directive 2018-04</u>), which are truncated compliance assessments that specifically evaluate affirmative action obligations for individuals with disabilities.

Now is the time for employers to check whether their location is listed on the CSAL. Please contact the Jackson Lewis Affirmative Action Compliance and OFCCP Defense practice for additional guidance on the CSAL, obligations under the OFCCP's new <u>2018 Directives</u>, or preparation of affirmative action plans.

Stay tuned for our webinar where we will provide insights and practical tips to help get ready for an upcoming OFCCP audit.

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