



HR GUMBO

a vibrant conference centered around how HR, AAP, Inclusion, and Pay Equity intersect to create a beautifully balanced work culture.



Handling Hot Audits Under the New Scheduling Letter



Agenda

1. CSAL – Corporate Scheduling Announcement List

2. Defense Strategies – Putting Fires Out Ahead of Time

3. Audit Letter Arrives – 30 Days to Comply and Submit Data

4. Auditor – Requests Follow Up Data with a Demanding Timeline

5. OFCCP Settlements FY 24

Speakers



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1. CSAL – Corporate Scheduling Announcement List – Heads Up

- Type of Audit – CMCE, Establishment, University, FAAP
- CSAL Time Period (6 Months)
- When Does the CSAL Get Published
- Scrubbing Current and Prior Year Data





1. CSAL – Corporate Scheduling Announcement List – Heads Up

- All Hands on Deck, Inform Executives, Point Person
- Schedule Weekly Meetings
- Get Counsel Involved – Privilege
- Get Current and Prior Year AAP's in Pristine Shape
- Begin to Address Weaknesses Now –
Example Veteran/Disabled Outreach



1. Weaknesses

- Scrubbing Data
- Vets and Disabled
- Compensation – Privileged
- Submitting Large Data Sets
- Disparity – Applicants & Hires



2. Defense

- Smaller Job Titles, Job Groups, Establishments
- Did We Take Care of Compensation
- Add Descriptors to Titles, Engineering I – Big Box
- Follow Internet Applicant Rule
- Provide Competitive & Non Competitive Promotions
- Provide Voluntary and Involuntary Terminations
- For Disparity Scrub Again, Consider Offers as Hires, Rehires as Non-competitive



3. Audit Letter – Arrives



3. Audit Letter

- 30 Days for Submission, Extensions are Rare
- Begin Reviewing the Letter with 26 Items for Submission
- High Priority to Hires, Applicants, Compensation, Accommodations
- Continue Weekly Meetings
- Submit AAP Audit Response on Time



3. Audit Letter – Key Call Outs

- Item 8 & 12 – Effective Outreach & Recruitment
- Item 9 & 13 – Audit & Reporting – Document & Review Recruitment, Hiring, Promotion, Accommodation Process, Training, etc.
- Item 10, 11, 14, 15, 18 – 6 Month Update
- Item 18 – Applicants, Hires, Promotions, Terminations, Job Group or Job Title
- Item 19 – Compensation for Current Year and Prior Year
- Item 23 – Accommodations

3. Audit – Ready Hit Send

- Current/Prior Year AAP
- Top Management has Been Briefed
- Mock Audit Completed
- Website, Notices, Posters, EEO Statements & Clauses, Listings
- Vets, EEO-1, OFCCP Portal Filings Complete



4. Auditor Follow Up

- Annualized Compensation
- Any Job Title/Group Changes
- EEO Contract Clause
- Males & Females Don't Equal Minority & Non-minority
- Unknown Applicants





4. Auditor Follow Up

- Compensation
- Why Don't the Voluntary and Involuntary Terms Add Up
- Starting Pay for 700 EE's
- Provide AAP from 3 Years Ago
- 2,000 Mandatory Job Listings
- Why Do Different Job Groups Have the Same Compensation

5. OFCCP 2024

- Arakelian – \$104k Female Apps.
- AGT – Postings Invalid Quals.
- Caterpillar – \$720k Black Welders
- Chevron – \$35,952 Vet Pay
- CGI – \$30k Accom.
- Comsaco – \$10k Term.
- CSC – \$80k Female Apps. Acc. Exec.
- Deere – \$1,105k Black & His. Apps.

<https://www.dol.gov/agencies/ofccp/foia/library/conciliation-agreements>



5. OFCCP 2024

- Four Rivers – \$78k Accom.
- GE Aero – \$443k Female Apps.
- Generac – \$500k Black & Native American
- Georgia State – \$50k Records, Comp., Job Groups, Listings
- Huntington – \$47k Accom.
- Goodyear – \$1,105k Black, His. Apps.
- Michael Baker – \$122k Female Prof. Comp.

<https://www.dol.gov/agencies/ofccp/foia/library/conciliation-agreements>

5.

OFCCP 2024

- Penn State – \$703k Female Prof. & Others
- Resource Metrix – \$2k Disability
- Sysco – \$133k Female Apps.
- Veteran Eval Svc. – \$20k Disability
- State Street – \$483k Female Dir.
- Western Global Air – \$84k Female Comp.

<https://www.dol.gov/agencies/ofccp/foia/library/conciliation-agreements>



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Questions



Resources We Like

<https://www.dol.gov/agencies/ofccp/faqs/scheduling-letters>

<https://www.dol.gov/agencies/ofccp/foia/library/corporate-scheduling-announcement-Lists>

<https://www.dol.gov/agencies/ofccp/manual/fccm>

<https://www.outsolve.com/>

<https://www.nationalilg.org/useful-odep-resources/>

<https://disabilityin.org/>



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