HRGUMBO

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

2. Defense Strategies – Putting Fires Out Ahead of Time

Data

1. CSAL – Corporate Scheduling Announcement List

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

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

5. OFCCP Settlements FY 24 outsolve.com

Speakers

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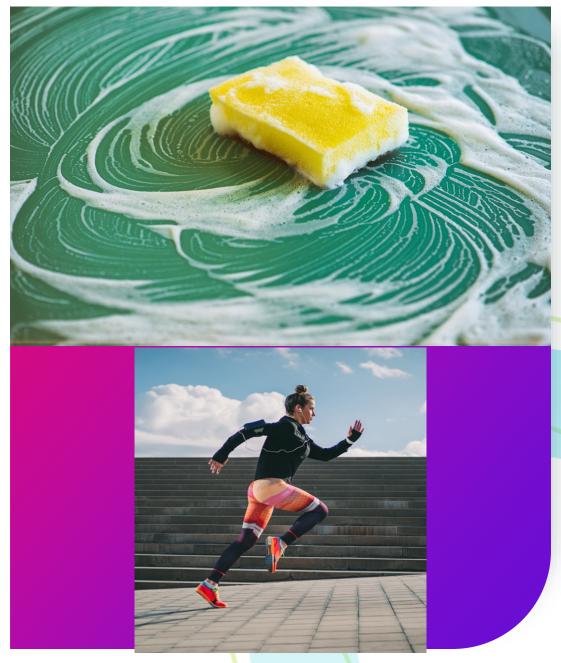


Becky Crowder

T. 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





T. 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





- 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

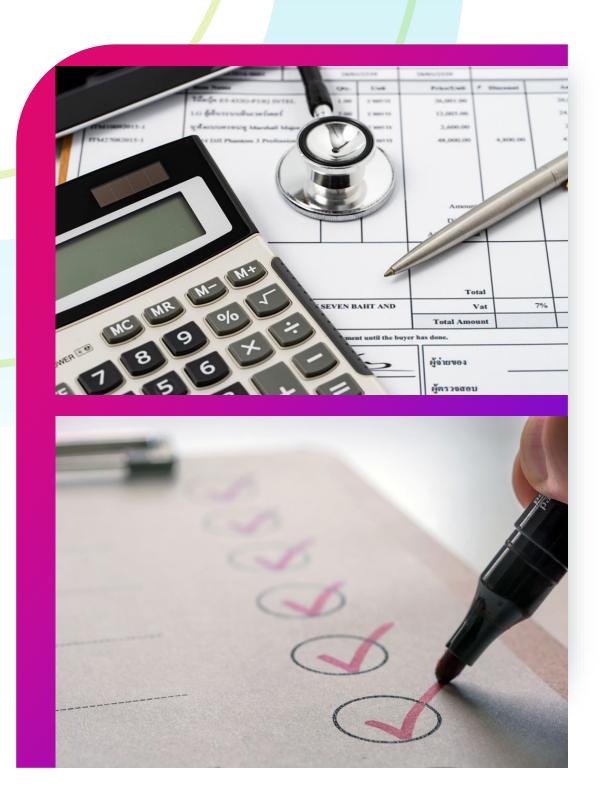




3. Audit Letter – Key Call Outs

- 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

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3. Audit Send • Current/Pric

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



3. Audit – Ready Hit

• Current/Prior Year AAP



4. Auditor Follow Up Annualized Compensation • Any Job Title/Group

- ChangesEEO Contract Clause
- Males & Females Don't Equal Minority & Non-minority
- Unknown Applicants







4. Auditor Follow Up

- Compensation
- Starting Pay for 700 EE's

- Have the Same Compensation

 Why Don't the Voluntary and Involuntary Terms Add Up Provide AAP from 3 Years Ago 2,000 Mandatory Job Listings Why Do Different Job Groups.

5. OFCCP 2024

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- 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.

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5. OFCCP 2024

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- 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

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s. Apps. e Prof. Comp.

5. OFCCP • Penn State – \$703k Female Prof. & Others 2024 Resource Metrix – \$2k Disability

- Sysco \$133k Female Apps.
- Veteran Eval Svc. \$20k Disability
- State Street \$483k Female Dir.
- Western Global Air \$84k Female Comp.

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Questions





Resources We Like <u>https://www.dol.gov/agencies/ofccp/faqs/scheduling-letters</u>

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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ACKNOWLEDGMENT & DISCLAIMER

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