

topic:

We just received a letter announcing a “Desk Audit” of our affirmative action plan, what do we do?

advice:

As required by law, you'll have 30 days to submit documents outlined in the OFCCP audit. AAP regulations are very labor intensive and not something to take lightly. Maintain a well-vetted checklist developed by AAP professionals experienced in working with audits and who remain current on regulations. Having the processes in place from the start is easier than explaining that you don't on the backend and risking actions for non-compliance.

While the OFCCP's audit request is far more extensive, minimally you'll need:

- The **current** and **prior year's** AAP narratives – Executive Order 11246; Veteran/Rehab 503 plans;
- **Supporting data** such as: 1) EEO-1 reports 2) Vets 4212 reports 3) Collective bargaining agreements 4) data on employment activities (hires/terminations/ promotions);
- **Statistical analysis** on job groups, availability; availability vs. incumbency; and placement goals
- Detailed **compensation data**
- Summarized **results and metrics** on efforts taken to advance and employ women, minorities, protected veterans and individuals with disabilities in your workforce and accommodations made along with way.

The key to surviving an audit is preparation. Consider that checklist – it could just make all of the difference. Good luck!



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