



SECTION 503 FOCUSED REVIEW REPORT

SECTION I. CONTRACTOR INFORMATION

1. HEADQUARTERS NAME & ADDRESS

XYZ Federal Contractor Inc.
 111 Contractor Way
 Charlotte, NC 28210

CMS Control # R000000
R00000000

2. SECTION 503 COMPLAINTS INVESTIGATED DURING REVIEW

=If resolved during the review, check box.

I00000000 # _____ # _____ # _____ # _____

3. CONTRACT COVERAGE

Contract information included in CMS? Yes No

Does the contract information cover the entire evaluation period? Yes No

Fill in contract information below.

AWARDING AGENCY	IF SUBCONTRACTOR, NAME OF PRIME CONTRACTOR	CONTRACT OR PURCHASE ORDER Number	CONTRACT DOLLAR AMOUNT	BEGIN AND END DATES
DOD	N/A	A0000000DJM10A61F0987	\$7,700,000.00	August 1, 2017 to August 1, 01/01/2018 – 12/31/2020
Dept. of Justice	N/A	DJM09A71F0980	\$15,800,000.00	04/01/2017 – 12/15/2019
Dept. of Justice	N/A	DJM11A91F0997	\$1,980,098.99	07/01/2019 – 10/15/2021

4. COMPANY CONTACTS	Name	Title	Phone/E-mail
CEO	Jill Taylor	President Chief Executive Officer	(803) 000-0000 taylor.jill@xyz.com
HR Manager	Rob Smith	Vice President of Human Resources & EEO Officer	(803) 000-0000 smith.rob@xyz.com
Individual Responsible for Reasonable Accommodations	Juan Sanchez	Accommodation Officer	(803) 000-0000 sanchez.juan@xyz.com
Individual Responsible for AAP Development	Rob Smith	Vice President of Human Resources & EEO Officer	(803) 000-0000 smith.rob@xyz.com
Diversity and Inclusion Specialist	N/A	N/A	N/A
Outside Representative	Liz Jackson	Attorney – Outside Counsel Ann Satchel P.C.	(803) 000-0000 jackson.liz@ann.com

SECTION I. CONTRACTOR INFORMATION

5. BACKGROUND INFORMATION (Gathered during the desk audit and updated if needed during the onsite portion of the evaluation.)

- a. Type of Industry: Defense contractor Commercial Banking
 Specific Facility Function: Contractor is a commercial banking organization, serving a broad range of consumer, commercial, corporate and institutional clients. ABC Federal Contractor’s primary businesses include deposit, credit, trust and investment services. Through various subsidiaries, the company provides credit cards, mortgage banking, insurance, and brokerage and capital markets. The Branch FAAP covers North and South Carolina retail bank branch locations and other employees at in-person client service sites.
- b. Number of Establishments Reporting to Headquarters: 035 (Branches)
- c. Is there a diversity and inclusion committee? No.
- d. Is there a reasonable accommodation policy? No Yes. See File Folder 7, Tab 7-A, Tab Reasonable Accommodation.



6. Is the headquarters part of a FAAP? Yes No

Date Scheduling Letter Received by Contractor	AAP Year	Prior Year Data Period	Current Year Data Period (if applicable)	Union	If unionized, % of unionized workforce	NAICS
9/30/2019	01/01/2019 – 12/31/2019	01/01/2018 – 12/31/2018	01/01/19 – 06/30/19	Y <input type="checkbox"/> / N <input type="checkbox"/>	% N/A	111111152211 0

SECTION I. CONTRACTOR INFORMATION

7. Geographic Area: SMSA 1520 – Charlotte-Gastonia-Concord, NC-SC

% Female	% Minority	% Protected Veterans	% Individuals with Disabilities	
47.6%	35.8%	8 N/A – 503 Focused Review	5 4.87%	

8. Contractor’s Employment Data

Total # Employees	Total # Female	Total # Minority	Total # Black	Total # Asian/PI	Total # Hispanic	Total # AmInd/AINat		Total # Ind. with Disabilities
1,601,000	60500	40500	10300	10 100	10 100	100		10 100
	% Female	% Minority	% Black	% Asian/PI	% Hispanic	% AmInd/AINat		% Ind. with Disabilities
	38 50%	25 50%	6 30%	6 10%	6 10%	60%		6 10%

SECTION II. CASE SUMMARY AND RECOMMENDATIONS

Summarize the results of the focused review addressing the points listed below.

Address each of the sections below.

Contractor Compliance: Provide an assessment and recommendations regarding the contractor's compliance with section 503 of the Rehabilitation Act requirements. Address if there are findings of violation of the equal opportunity clause (discrimination including failure to provide reasonable accommodation) or any of the affirmative action requirements (Subpart C: Affirmative Action Program). List each of the findings, a brief description of the supporting facts and evidence and the recommended resolution.

Best Practices: Provide an assessment of best practices identified during the review that enhance or improve employment opportunities for individuals with disabilities. List the best practice. Provide a description of the activity and its results.

Conciliation Efforts: As applicable, briefly describe conciliation efforts. If there is no finding of a violation, and a closure letter is to be issued, provide a brief description of the basis for this action. Be sure to indicate all document(s) to be issued to the contractor (e.g., Predetermination Notice, Notice of Violation, Show Cause Notice, Conciliation Agreement or closure letter).

A. Summary of Interviews and Onsite Inspection:

1. Results of interviews with Company Officials (Recruiters, Managers, Reasonable Accommodations Manager, ADA Committee, etc.)

Test Narrative.

2. Results of Employee interviews including individuals who requested reasonable accommodations.

Test Narrative.

3. Results of facility inspection.

Test

Narrative.

B. Contractor Compliance:

1. Equal Opportunity Clause (41 CFR 60-741.5):

Test Narrative.

2. Affirmative Action Requirements (41 CFR 60-741.40 through -741.45):

Test Narrative.

SECTION II. CASE SUMMARY AND RECOMMENDATIONS

3. Best Practices:

Test Narrative.

4. Conciliation Efforts:

Test Narrative.

	COMPLIANCE OFFICER	ASSISTANT DISTRICT DIRECTOR	DISTRICT DIRECTOR/REGIONAL DIRECTOR
SIGNATURE	KENDRICK SNOW	LISA BRAVO	JIM LEE
DATE	01/03/2020	01/03/2020	01/03/2020

SECTION III. PREPARATION

Address the contractor’s past performance related to Section 503 with OFCCP, any current complaints with EEOC or other DOL agencies and any collaboration with ODEP or State Vocational Rehabilitation organizations during the focused review

1. Past Problems. If there were no prior OFCCP compliance reviews or investigations of the contractor, check here and go on to item 2 below. (x)

a. Past Problems? Yes / No List the previous violations, identify if it was the result of a compliance evaluation or compliant investigation, the closure date of the evaluation or investigation and how the violations were resolved.

Test

Narrative.

b. Recurrence? Yes / No Explain if yes.

No

2. Known Complaints or Enforcement Proceedings. If there are no complaints filed or pending with other agencies, e.g., EEOC, WHD or OSHA, and no new or ongoing enforcement proceedings by any of these agencies, check here and go on to the next page. (x)

If there are complaints or enforcement proceedings, for each one, list the agency involved, the basis, issue, current status and the area of the contractor's workforce it appears to concern. Add additional sheets as an attachment to the Focused Review Report, if needed. If at any point in the review, you determine there is a related potential problem not investigated in the complaints or enforcement proceedings, complete part (b) below.

a. List Known Complaints or Enforcement Proceedings.

Agency	Basis	Issue	Status	Job Group or Department (if available)
EEOCN/A	Race	Hiring	Closed	Technicians

b. Related Problem Not Investigated in the Known Complaint or Enforcement Proceedings? Yes/No Explain if yes.

No. Narrative.

3. Explain any collaboration with other agencies, e.g., if you reach out to the State Vocational Rehabilitation office for assistance, or refer the contractor to the Job Accommodation Network (JAN) for assistance with reasonable accommodation information during the review. In your description, list the agency, the basis for the collaboration, and the results.

Test/A

**SECTION IV. DESK AUDIT
PART A. ASSESSMENT OF CONTRACTOR SUBMISSION**

Complete this section when you receive the Section 503 affirmative action program and support data.

Initial Review: Indicate if each component is included in the affirmative action program. Determine if each component is acceptable. Compare the contractor's submission to the requirements in the regulations. If a component is either not included or not acceptable, describe the problem under the summary of acceptability. To resolve the problem, work with the contractor during the desk audit and, if necessary, during the onsite.

1. Initial Review of AAP

	INCLUDED IN AAP? Indicate Y/N	ACCEPTABLE? (text only) Indicate Y/N	If NO, include in Section IV, 3. Below
EEO POLICY STATEMENT 41 CFR 60-741.44(a)	Y	Y	
REVIEW OF PERSONNEL PROCESSES 41 CFR 60-741.44(b)	Y	Y	
REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATIONS 41 CFR 60-741.44(c)	Y	Y	
REASONABLE ACCOMMODATION 41 CFR 60-741.44(d)	Y	Y	
HARASSMENT PREVENTION 41 CFR 60-741.44(e)	Y	Y	
EXTERNAL DISSEMINATION OF AFFIRMATIVE ACTION POLICY 41 CFR 60-741.44(f)(1)(ii)	Y	Y	
ASSESSMENT OF EACH OUTREACH & POSITIVE RECRUITMENT ACTIVITY 41 CFR 60-741.44(f)(3)	Y	Y	
ASSESSMENT OF TOTALITY OF OUTREACH & POSITIVE RECRUITMENT EFFORTS 41 CFR 60-741.44(f)(3)	Y	Y	
INTERNAL DISSEMINATION OF EEO POLICY 41 CFR 60-741.44(g)	Y	Y	
AUDIT AND REPORTING SYSTEM 41 CFR 60-741.44(h)	Y	Y	
ESTABLISHMENT OF RESPONSIBILITY FOR IMPLEMENTATION 41 CFR 60-741.44(i)	Y	Y	
TRAINING TO ENSURE AAP IMPLEMENTATION 41 CFR 60-741.44(j)	Y	Y	

**SECTION IV. DESK AUDIT
PART A. ASSESSMENT OF CONTRACTOR SUBMISSION**

DATA COLLECTION ANALYSIS 41 CFR 60-741.44(k);	Y	Y	
UTILIZATION GOAL AND ANALYSIS 41 CFR 60-741.45	Y	Y	
IDENTIFICATION OF PROBLEM AREAS 41 CFR 60-741.45(e)	Y	Y	
ACTION ORIENTED PROGRAMS 41 CFR 60-741.45(f)	Y	Y	

2. Review of Desk Audit Information

	INCLUDED IN DESK AUDIT SUBMISSION? Indicate Y/N	ACCEPTABLE? Indicate Y/N If NO, include in Section IV, 3. Below
COPIES OF ANY WRITTEN REASONABLE ACCOMMODATION POLICIES, AND DOCUMENTATION OF ANY REQUESTS RECEIVED AND THEIR RESOLUTION	Y	Y
MOST RECENT ASSESSMENT OF PERSONNEL PROCESSES 41 CFR 60-741.44(b)	Y	Y
MOST RECENT ASSESSMENT OF PHYSICAL AND MENTAL QUALIFICATIONS 41 CFR 60-741.44(c)	Y	Y
CURRENT YEAR EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PROGRAM 41 CFR 60-1.40	Y	Y
JOB GROUP ANALYSIS 41 CFR 60-2.12	Y	Y
EMPLOYER INFORMATION REPORT EEO- 1 (STANDARD FORM 100 REV.) – LAST THREE YEARS	Y	Y
COPIES OF COLLECTIVE BARGAINING AGREEMENTS	Y	Y

**SECTION IV. DESK AUDIT
PART A. ASSESSMENT OF CONTRACTOR SUBMISSION**

3. Summary of Acceptability

Summarize all Section 503 AAP and support data problems identified during the desk audit. Describe the problem, actions taken or plans to resolve the problem, the findings, and resolution. If the problem is not resolved at desk audit, it will be included in the onsite investigation. (Add additional sheets as an attachment to the Focused Review Report, if needed).

#	AAP AND DESK AUDIT INFORMATION ACCEPTABILITY PROBLEMS	Onsite <input checked="" type="checkbox"/>
0	<p>Example PROBLEM: The contractor has 200 employees in their workforce and their goal analysis was not based on its AAP job groups. ACTION TAKEN: CO will provide compliance assistance to the contractor during the onsite. FINDINGS: On June 14, 2019, CO explained to the HR director and the AAP coordinator that with more than 200 employees, they need to analyze goals based on job groups. The contractor understood the requirement and revised its analysis. RESOLUTION: On June 14, 2019, the contractor provided the CO provided compliance assistance on developing section 503 goals, On June 30, 2019 the contractor resubmitted a revised Section 503 goal analysis using the Executive Order 11246 AAP job groups.</p>	<input type="checkbox"/>
1	<p>PROBLEM: Test PROBLEM: N/A – There were no AAP and desk audit information acceptability problems. ACTION TAKEN: Test FINDINGS: Test RESOLUTION: Test</p>	<input type="checkbox"/>
2	<p>PROBLEM: ACTION TAKEN: FINDINGS: RESOLUTION:</p>	<input type="checkbox"/>
3	<p>PROBLEM: ACTION TAKEN: FINDINGS: RESOLUTION:</p>	<input type="checkbox"/>
4	<p>PROBLEM: ACTION TAKEN: FINDINGS: RESOLUTION:</p>	<input type="checkbox"/>
5	<p>PROBLEM: ACTION TAKEN: FINDINGS: RESOLUTION:</p>	<input type="checkbox"/>

SECTION IV. DESK AUDIT
PART B. ASSESSMENT OF UTILIZATION ANALYSIS

Utilization Analysis. Identify whether the contractor met the 7 percent disability utilization goal in each of its affirmative action program job groups or, if the contractor has fewer than 100 employees, in the contractor’s workforce as a whole. A supplemental worksheet is provided for your use.

If the goal was not met, did the contractor take steps to determine whether and where impediments to equal employment opportunity exist. If any problem areas are identified, the contractor must develop and execute action-oriented programs designed to correct them.

Below, identify the issue by job group; identify the steps the contractor took to determine if impediments exist, and the action-oriented programs developed to correct any identified problem areas. Provide an explanation of any findings, indicating whether the problem was resolved or not, and what remedial action(s) was taken. Also, explain any progress the contractor is making in the current year, if the contractor is six months or more into its current year affirmative action program.

Use section 1 for employers with more than 100 employees and use section 2 for employers with 100 or fewer employees.

#	1. UTILIZATION GOAL PROBLEM AREAS – MORE THAN 100 EMPLOYEES	Onsite <input checked="" type="checkbox"/>
	<p>If contractor set goals by job group, did the contractor meet the 7 percent utilization goal in each job group? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If no, identify the job group(s) where the goal was not met (including percent achieved by the contractor), the steps taken by the contractor to identify problem areas and the action-oriented programs to correct identified problem areas.</p>	
1	JOB GROUP & PERCENT ACHIEVED: Test	<input type="checkbox"/>
	STEPS TAKEN: Test	
	PROBLEM AREAS IDENTIFIED: Test	
	ACTION-ORIENTED PROGRAMS: Test	
	CURRENT YEAR PROGRESS:	
	FINDINGS: Test	
	RESOLUTION: Test	
2	JOB GROUP & PERCENT ACHIEVED:	<input type="checkbox"/>
	STEPS TAKEN:	
	PROBLEM AREAS IDENTIFIED:	
	ACTION-ORIENTED PROGRAMS:	
	CURRENT YEAR PROGRESS:	
	FINDINGS:	
	RESOLUTION:	
3	JOB GROUP & PERCENT ACHIEVED:	
	STEPS TAKEN:	

SECTION IV. DESK AUDIT PART B. ASSESSMENT OF UTILIZATION ANALYSIS		
	PROBLEM AREAS IDENTIFIED: ACTION-ORIENTED PROGRAMS: CURRENT YEAR PROGRESS: FINDINGS: RESOLUTION:	<input type="checkbox"/>
4	JOB GROUP & PERCENT ACHIEVED: STEPS TAKEN: PROBLEM AREAS IDENTIFIED: ACTION-ORIENTED PROGRAMS: CURRENT YEAR PROGRESS: FINDINGS: RESOLUTION:	<input type="checkbox"/>
5	JOB GROUP & PERCENT ACHIEVED: STEPS TAKEN: PROBLEM AREAS IDENTIFIED: ACTION-ORIENTED PROGRAMS: CURRENT YEAR PROGRESS: FINDINGS: RESOLUTION:	<input type="checkbox"/>

2. UTILIZATION GOAL PROBLEM AREAS – 100 or FEWER EMPLOYEES	Onsite <input checked="" type="checkbox"/>
If contractor opted to set goal for entire workforce, did the contractor meet its 7% utilization goal? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> (if no, identify problem area(s)) If no, identify the percent achieved by the contractor for its workforce as a whole, the steps taken to identify problem areas and the action-oriented programs to correct identified problem areas.	
PERCENT ACHIEVED: N/A STEPS TAKEN: PROBLEM AREAS IDENTIFIED: ACTION-ORIENTED PROGRAMS: CURRENT YEAR PROGRESS: FINDINGS: RESOLUTION:	<input type="checkbox"/>

SECTION IV. DESK AUDIT
PART C. ASSESSMENT OF OUTREACH AND RECRUITMENT

1. **Assessment of Each Effort.** Identify whether the contractor evaluated the effectiveness of each outreach and positive recruitment effort they engaged in during the affirmative action program year. When evaluating the contractor's assessment, consider if the contractor listed each effort including the name and date, and indicate whether the specific event was effective and why it was considered effective. Consider if the events under taken are related to the job groups that are identified as being underutilized.

Did the contractor evaluate the effectiveness of each outreach and positive recruitment effort it undertook?

Yes No N/A

If no, identify problem area, steps taken to investigate, findings and resolutions

PROBLEM AREA: Test/A

STEPS TAKEN (INCLUDING COMPLIANCE ASSISTANCE OFFERED): Test

FINDINGS:

RESOLUTIONS: Test

2. **Assessment of the Totality of Efforts.** Identify whether the contractor assessed and concluded that the totality of its efforts were effective in identifying and recruiting qualified individuals with disabilities. Also, indicate whether the contractor's conclusion is reasonable and, if not, explain why. When assessing reasonableness, determine if the assessment reflects results, for example did the efforts increase the numbers of individuals with disabilities in the selection pools, were individuals with disabilities hired.

Did the contractor assess the totality of its efforts?

Yes No

Did the contractor determine that its efforts were effective in identifying and recruiting qualified individuals with disabilities?

Yes No

Did the contractor determine that its efforts were not effective in identifying and recruiting qualified individuals with disabilities?

Yes No

Describe the alternative efforts that the contractor identified to recruit qualified individuals with disabilities.

Test Narrative.

Was the contractor's conclusion reasonable? If no, explain why in the Findings section below.

Yes No

SECTION IV. DESK AUDIT
PART C. ASSESSMENT OF OUTREACH AND RECRUITMENT

Steps Taken: Test

Narrative.

Findings: Test

Narrative.

Resolution: Test

Narrative.

3. **Best Practices in Outreach and Recruitment:** *(Describe any best practices identified in this area, include the effort and its results, for example the number of individuals with disabilities hired or promoted.)*

Narrative.

Test

SECTION IV. DESK AUDIT
PART D. ASSESSMENT OF DATA COLLECTION ANALYSIS

The contractor is required to maintain the data for three years. However, the affirmative action program may include only one of the three years. Before analyzing the data using the Data Analysis spreadsheet, ensure that the affirmative action program contains data for each 44(k) item listed. This may come in the form of a data table or a narrative statement.

To analyze the data, first verify that it appears to be reasonably correct by comparing the total number of applicants to the total number of applicants in the Executive Order 11246 affirmative action program. Then compare the total number of applicants hired to the total number of applicants hired in the Executive Order affirmative action program. Finally compare the total number of jobs filled to the total number of hires, promotions and transfers (if available) in the Executive Order affirmative action program.

Note, the data is provided for the establishment as a whole and not by job group. It can be used for analyzing absences, concentrations, and trends. It cannot be used for running impact ratio analyses. Additionally, taken into consideration with the outreach and recruitment efforts, the data may be used to determine the effectiveness of a contractor's efforts.

1. Verify Data:

Total Number of Applicants in the Section 503 AAP: 1999

Total Number of Applicants: Executive Order AAP: 1999

Total Number of Hires in the Section 503 AAP: 100

Total Number of Hires: Executive Order AAP: 100

Total Number of Jobs Filled in the Section 503 AAP: 100

Total Number of hires, promotions and transfers (if available) in the Executive Order AAP: 100

If there is a difference in either set of data, describe the steps taken to harmonize the data, findings and resolutions.

Narrative.

SECTION IV. DESK AUDIT
PART D. ASSESSMENT OF DATA COLLECTION ANALYSIS

2. Trends. Examine the three-year trend in applicants and hires describing if there are any negative or positive trends. A supplemental Excel worksheet is provided to assist in examining the trend. If illustrative, include the comparison charts from the worksheet. If negative trends are identified, describe the steps taken to investigate the negative trend, the findings and resolutions. As a part of the investigation, consider the contractor’s outreach and recruitment efforts, inclusion programs and self-identification procedures.

Three Years of Data: The regulations require the contractor to maintain the Section 503 data for three years. However, it is permissible for a contractor to include only one year of data in the current year AAP. If only one year of data is received for desk audit, begin the analysis and either request the data at desk audit or have it provided during the onsite. This data is being analyzed to determine trends in disability employment in order to identify problem areas and best practices.

Identify the timeframe for the three-year period and describe the trends in applicants and hires over the three-year period. You may use the charts from the spreadsheet.

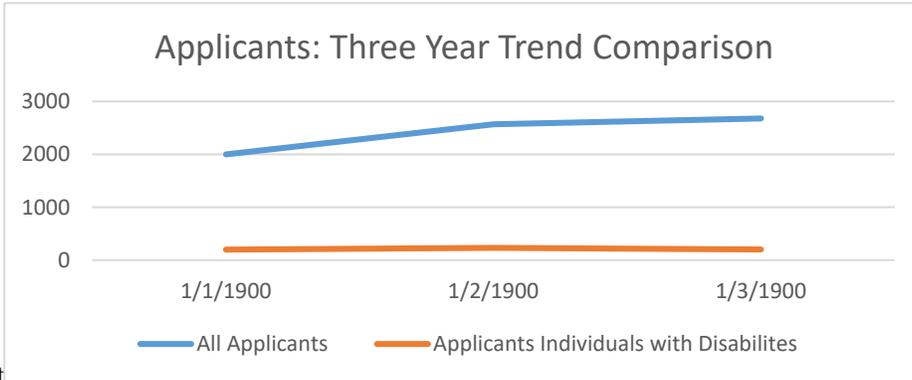
Column1	2019	2018	2017
All Applicants	1999	2567	2,678
Applicants Individuals with Disabilities	198	232	200
Jobs Filled	100	102	127
Column1	2019	2018	2017
All Hires	100	102	127
Individuals with Disabilities Hired	9	13	10

Narrative.

Test

SECTION IV. DESK AUDIT
PART D. ASSESSMENT OF DATA COLLECTION ANALYSIS

Applicant Trends: Describe the trends for all applicants and the trends for applicants who Self-identify as individuals with disabilities. Then compare those trends.

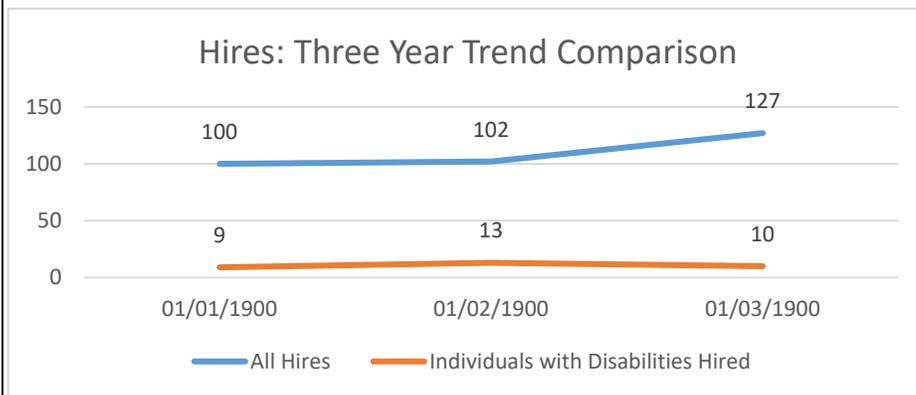


Test

Narrative.

Hiring Trends: Describe the trends for all hires and the trends for hires who Self-identify as individuals with disabilities. Then compare those trends.

Test



Narrative.

Describe Concerns or potential problem areas, the actions taken, findings, and resolutions:

Test Narrative.

**SECTION IV
PART E. ONSITE PLANNING**

In preparation for the onsite investigation, it is necessary to review pertinent contractor information in order to develop an effective onsite plan and ensure that appropriate personnel are available for interview. If this information is not provided in the affirmative action program submission, it should be collected during the desk audit and summarized below.

This information may be obtained by searching the contractor’s website or by contacting the contractor by telephone during the desk audit. If you are unable to obtain the information before the onsite, please check the box indicating it will be obtained from the contractor during the onsite.

#	1. Additional Information Needed	Onsite <input checked="" type="checkbox"/>
1.	<p>Describe the contractor’s application process, including if it is online or at the contractor’s establishment. Include when applicants are offered the invitation to self-identify.</p> <p>Test Narrative.</p>	<input type="checkbox"/>
2.	<p>Obtain a copy of a blank application and screening questions used by the contractor.</p> <p>Narrative. Test</p>	<input type="checkbox"/>
3.	<p>Describe the contractor’s flexible workplace policies. Obtain a copy of the policies and the name of the person who oversees the policies.</p> <p>Test Narrative.</p>	<input type="checkbox"/>
4.	<p>Obtain a list of any and all Special Emphasis Groups that focus on disability and disability inclusion.</p> <p>Test Narrative.</p>	<input type="checkbox"/>

5.	<p>Describe the contractor’s compensation policies; obtain a copy and the name of the person who oversees the policy. Examine the policy ensuring individuals with disabilities are not paid less because of compensation received from another source or because of the cost of a reasonable accommodation.</p> <p>Narrative.</p> <p>Test</p>	
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**SECTION IV
PART E. ONSITE PLANNING**

Identify any other problems that require additional investigation during the onsite review, such as application screening questions that may deter individuals with disabilities from applying, representation of individuals with disabilities in a single job group, etc. Provide an explanation of any findings, indicating how the problem was resolved and what remedial action(s) was taken.

#	2. ADDITIONAL PROBLEMS FOR ONSITE INVESTIGATION	Onsite <input checked="" type="checkbox"/>
1	PROBLEM AREA: Test Narrative. ADDITIONAL INFO: Test FINDINGS: Test RESOLUTION: Test	<input type="checkbox"/>
2	PROBLEM AREA: ADDITIONAL INFO: FINDINGS: RESOLUTION:	<input type="checkbox"/>
3	PROBLEM AREA: ADDITIONAL INFO: FINDINGS: RESOLUTION:	<input type="checkbox"/>
4	PROBLEM AREA: ADDITIONAL INFO: FINDINGS: RESOLUTION:	<input type="checkbox"/>
5	PROBLEM AREA: ADDITIONAL INFO: FINDINGS: RESOLUTION:	<input type="checkbox"/>

SECTION V. ONSITE INVESTIGATION
PART A. EQUAL OPPORTUNITY CLAUSE IMPLEMENTATION

Determine whether the contractor complied with the following requirements (Yes/No). If “Yes,” indicate how this was confirmed. If “No,” explain the problem, whether it was resolved and, if resolved, indicate how. If requirements are not resolved, they must be included as a violation in the Case Summary and Recommendations section above.

POSTINGS AND NOTICES

Included the EO Clause in subcontracts and purchase orders (41 CFR 60-741.5)

Test

Narrative.

Posted current notices, including the “EEO is the Law Poster and any required supplement in conspicuous places, and electronically where required (41 CFR 60-741.5)

Test

Narrative.

Notified parties with which it has a collective bargaining agreement of its EEO obligations (41 CFR 60-741.5)

Test

Narrative.

Made the Section 503 AAP available for inspection, and posted the location and hours (41 CFR 60-741.41)

Test

Narrative.

Included EEO language in job advertisements (41 CFR 60-741.5)

Test

Narrative.

PRE-EMPLOYMENT MEDICAL INQUIRIES

Complied with requirements related to disability related questions and medical examinations (41 CFR 60-741.23)

Test

Narrative.

Complied with requirements related to confidentiality and use of medical information (41 CFR 60-741.23(d))

Test

Narrative.

**SECTION V. ONSITE INVESTIGATION
PART B. SELF-IDENTIFICATION**

Determine whether the contractor complied with the following requirements (Yes/No). If “Yes,” indicate how this was confirmed. If “No,” explain the problem, whether it was resolved and, if resolved, indicate how. If requirements are not resolved, they must be included as a violation in the Case Summary and Recommendations section above.

SELF-IDENTIFICATION PROCEDURES

Invited applicants to self-identify as individuals with disabilities at pre-employment and post offer (41 CFR 60-741.42(a) and (b))

Describe the self-identification process, including whether the contractor used a compliant form or format (if online).

Test

Narrative.

Reminded employees once in the five-year period that they may voluntarily update their status (41 CFR 60-741.42(c))

Test

Describe how the contractor informed employees that they may update their status

Test Narrative

Invited employees to self-identify in the first year of becoming a covered contractor and, if appropriate in five year intervals thereafter (41 CFR 60-741.42(c))

Describe the contractor’s invitation and process for this requirement.

Test

Narrative.

SELF-IDENTIFICATION RATE

Self-Identification Rate: Determine the rate of applicants and employees who have self-identified as individuals with disabilities from the utilization rate during the AAP year.

**SECTION V. ONSITE INVESTIGATION
PART B. SELF-IDENTIFICATION**

Determine whether the contractor complied with the following requirements (Yes/No). If “Yes,” indicate how this was confirmed. If “No,” explain the problem, whether it was resolved and, if resolved, indicate how. If requirements are not resolved, they must be included as a violation in the Case Summary and Recommendations section above.

Employees: Test Narrative.

Applicants: Test Narrative

MAINTAINED DATA IN A SEPARATE DEMOGRAPHIC FILE

Describe how the contractor maintains self-identification information.

Test Narrative.

BEST PRACTICES RELATED TO SELF-IDENTIFICATION

Describe best practices that the contractor uses to encourage applicants and employees to self-identify.

Test Narrative.

**SECTION V. ONSITE INVESTIGATION
PART C. EXECUTIVE ORDER 13496 IMPLEMENTATION**

Determine whether the contractor complied with the following requirements (Yes/No). If “Yes,” indicate how this was confirmed. If “No,” explain the problem, whether it was resolved and, if resolved, indicate how. If requirements are not resolved, they must be included as a violation in the Case Summary and Recommendations section above.

POSTED NOTICE OF EMPLOYEE RIGHTS UNDER THE NATIONAL LABOR RELATIONS ACT
(Required poster and electronic posting, if applicable) (29 CFR 471.2)

TEST NARRATIVE.

**SECTION V. ONSITE INVESTIGATION
PART C. EXECUTIVE ORDER 13496 IMPLEMENTATION**

Determine whether the contractor complied with the following requirements (Yes/No). If “Yes,” indicate how this was confirmed. If “No,” explain the problem, whether it was resolved and, if resolved, indicate how. If requirements are not resolved, they must be included as a violation in the Case Summary and Recommendations section above.

INCLUDED NOTICE OF EO 13496 OBLIGATIONS IN SUBCONTRACTS (29 CFR 471, Subpart A, app. A)

TEST NARRATIVE.

**SECTION V. ONSITE INVESTIGATION
PART D. POTENTIAL DISCRIMINATION INVESTIGATION**

Discrimination Investigative Results. Record the onsite investigative findings for information discovered during the onsite investigation (e.g., anecdotal evidence describing discrimination or harassment against employees based on disability. Include a discussion of the nature of the problem, relevant evidence collected and reviewed, actions (if any) taken to resolve the problem, and whether and how the problem was resolved. Include any findings of violation in **Case Summary and Recommendations**, Section II, above.

Some examples of discrimination findings under Section 503 include failure to hire or promote because of a disability or perceived disability, failure to provide a reasonable accommodation, harassment because of disability or paying an individual less because of their disability, because they receive money from another source based on their disability or because they received a reasonable accommodation. In terms of systemic discrimination, this may be possible if there are blanket policies, procedures or practices that impact individuals with disabilities. For example, a policy or practice of not providing reasonable accommodation to individuals with disabilities, or a policy of not promoting individuals with disabilities.

SUMMARY OF PROBLEMS, ACTIONS TAKEN AND RESOLUTION *(Add additional sheets as an attachment to the SCER, if needed)*

0. Example:

Problem Area: All employees with disabilities are concentrated in the Office Assistant job group. (See Tab 1 – Utilization Analysis)

Steps Taken: During the onsite, examined the hires and placements into the Office Assistant job group. Interviewed the human resource manager. Interviewed 8 of the 16 employees in the Office Assistant job group. (See Tab 2 – Interviews 1 through 8)

Evidence: All four of the contractor’s employees with disabilities are in the Office Assistant job group. They hold the same job title, mail distributor. From interviews, with the disabled employees, each explained that they were told that they were not eligible to apply for promotions to other jobs at the establishment. Review of the personnel files showed that all employees in the job group were reviewed and we found that the employees with disabilities were not afforded the same promotional opportunities.

In his interview, the human resource manager (See Tab 2 – Interview 9) indicated he did not believe it was in the best interest of the individuals to progress beyond the Office Assistant job group as the work may be too challenging to the individuals. OFCCP further identified several individuals with disabilities who had submitted an application for the promotional opportunities but were denied an interview.

Findings: A Notice of Violation (NOV) was issued to the contractor on June 25, 2019. The NOV included the finding that the contractor violated the EO clause when it rejected the four individuals from further consideration based on their disabilities. (See Correspondence– NOV)

Resolution: Although the contractor provided additional documentation, it could not rebut the initial finding. A Conciliation Agreement was signed on September 1, 2019 that resulted in job offers and back pay to the four individuals impacted. (See Correspondence– CA)

**SECTION V. ONSITE INVESTIGATION
PART D. POTENTIAL DISCRIMINATION INVESTIGATION**

1.	Problem Area: Test Narrative. Steps Taken: test Evidence: Test Findings: Test Resolution: Test
2.	Problem Area: Steps Taken: Evidence: Findings: Resolution:
3.	Problem Area: Steps Taken: Evidence: Findings: Resolution:
4.	Problem Area: Steps Taken: Evidence: Findings: Resolution: