



BERKSHIRE ASSOCIATES



ENSURING APPLICANT DATA CAN WITHSTAND OFCCP SCRUTINY

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January 2019



Introduction

Federal contractors or subcontractors must comply with many affirmative action obligations surrounding applicant management, job postings, career site statements, and outreach effort evaluations, to name just a few. This guide will help you put together robust applicant data for your affirmative action plan so it will be more likely to withstand OFCCP scrutiny in an audit.

PREPARING YOUR APPLICANT DATA

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JOB APPLICATION

JOB APPLICATION

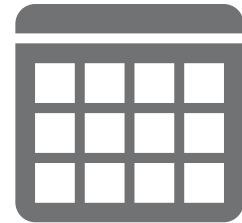
JOB APPLICATION

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Date Range

Applicant data is the only affirmative action plan data set that is generated based on a requisition fill date rather than the prior 12 months from the plan date. All external requisitions that were filled during the plan year should be included. Do not include requisitions with only an internal placement, canceled requisitions, requisitions on hold, or requisitions that are still open.



New Hires

If possible, include the requisition number in the new hire file. This helps to narrow the applicant data included to only those applicants who were considered for the hires in the plan.



PREPARING YOUR APPLICANT DATA



Generating Applicant Data

Pull in as many data points as possible if you are using an Applicant Tracking System. If you track manually, then include all data points in your spreadsheet. Collecting more information up front saves time as it is easier to filter data out than pull it again. Include the following if applicable to your organization:

Include the following if applicable to your organization:

- Applicant ID (if available) and employee ID (if hired)
- Name, race, gender, disability, and Veteran status
- Application date, offer date, and hire date
- Requisition number (helps in determining applicant pools)
- Job title or job code
- Location code (if multi-establishment company)
- Selection stage step (prescreening, interview, offer)
- Selection stage status (1st interview, withdrawn, rejected, rescinded)
- Rejection/disposition reason (not able/willing to travel, no work authorization, lacks preferred education)
- Submission source (name of website, agency, employee that referred the candidate)
- Recruiter/hiring manager name

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APPLICATION

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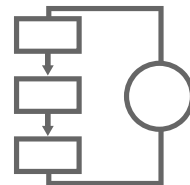
Temporary to Regular Conversions Data Points

If you are an employer who sometimes fills positions doing temporary to permanent conversions, we recommend setting up a requisition system with the temp agency and periodically collect the data points mentioned in the previous bullet from them. Affirmative action obligations surrounding applicant management and job postings are not suspended for employee conversions from temporary to regular. Instead of retroactively seeking data from the temp agency to include in your applicant log, consider proactively collecting the necessary data.



Data Management Techniques

Ensure you have documentation of all data management techniques used to manage your applicant pools, for all requisitions.



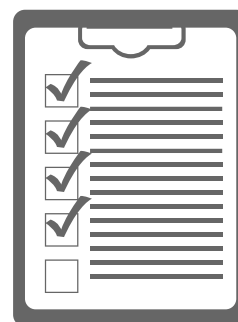
PREPARING YOUR APPLICANT DATA



Quality Checks

Always have your new hire data handy. Verify each new hire has a corresponding applicant pool. Remove data associated with requisitions that do not have a corresponding new hire record. Investigate any areas of 1:1s—where one applicant applied for the job, and the applicant was hired—in those cases, see if any additional applicant data is available.

Verify that self-ID information (race, gender, disability, and Veteran) between new hire and applicant record for the same individual match. Check to see if you have applicants with application dates beyond the hire date noted on the requisition. This might indicate evergreen or open requisitions were not closed in a timely manner. Run a check on the use of disposition codes. If you find the majority of applicants are coded to one disposition code, or if everyone who was not hired is “not best qualified,” consider revisiting the codes available and training recruiters on the codes available.



A smiling woman with long brown hair and black-rimmed glasses is sitting at a desk. She is wearing a white sleeveless top. In front of her is a laptop and several books. The background is a blurred office setting with shelves. The entire image has a light green tint.

BE AUDIT READY

Once these kinks have been addressed, your data is ready for further analysis. This will also put you in a good starting place in case of an OFCCP audit. Berkshire's consultants can work with you on the applicant data provided to ensure the correct records are included.

For more information on how we can assist you with your applicant data, audits, or other affirmative action compliance services contact us at:

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