

Checklist for Compliance with Section 503 of the Rehabilitation Act of 1973, As Amended

INTRODUCTION

Note: this checklist should not be used as a substitute for contractors reviewing their regulatory requirements and other guidance provided by the Office of Federal Contract Compliance Programs (OFCCP), which enforces Section 503. Further, using this checklist does not guarantee or equate to compliance with the regulations.

Purpose of Section 503:

The Section 503 regulations set forth the standards for compliance with section 503 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 793), which prohibits discrimination against individuals with disabilities and requires Government contractors and subcontractors to take affirmative action to employ and advance in employment qualified individuals with disabilities. [60.741.1]

Definition of Disability from Section 503:

The term disability means, with respect to an individual:

- (i) A physical or mental impairment that substantially limits one or more major life activities of such individual;
- (ii) A record of such an impairment; or
- (iii) Being regarded as having such an impairment.

General purpose of Section 503's Subpart C, Affirmative Action Program:

An affirmative action program is a management tool designed to ensure equal employment opportunity and foster employment opportunities for individuals with disabilities. An affirmative action program institutionalizes the contractor's commitment to equality in every aspect of employment and is more than a paperwork exercise. An affirmative action program is dynamic in nature and includes measurable objectives, quantitative analyses, and internal auditing and reporting systems that measure the contractor's progress toward achieving equal employment opportunity for individuals with disabilities.

Applicability of Section 503 Regulation in General and Subpart C, Affirmative Action Program Requirements in Particular:

The Section 503 regulations apply to all government contracts and subcontracts in excess of \$15,000 for the purchase, sale or use of personal property or nonpersonal services (including construction, but not federally assisted construction). [60-741.1(b)]

The requirements of Subpart C of the Section 503 rule pertaining to written affirmative action program requirements apply to every government contractor that has 50 or more employees and a federal contract of \$50,000 or more. [60-741.40(b)]

Checklist for Compliance with Section 503 Subpart C, Affirmative Action Program:

The following Section 503 Subpart C, Affirmative Action Program Checklist is organized to assist federal contractors with 50 or more employees and a contract of \$50,000 or more to benchmark their current activities against Section 503, Subpart C Affirmative Action Program requirements. By comparing their current activities against the regulatory requirements, federal contractors can develop an Affirmative Action Program that ensures equal employment opportunity and fosters employment opportunities for individuals with disabilities.

The checklist is organized by the Subpart C, Affirmative Action Program section numbers. The questions are derived from the associated regulatory language. Please note, this checklist should not be used as a substitute for contractors reviewing their regulatory requirements and other guidance provided by the Office of Federal Contract Compliance Programs (OFCCP), which enforces Section 503. Further, using this checklist does not guarantee or equate to compliance with the regulations.

Checklist for Compliance with Section 503 of the Rehabilitation Act of 1973, As Amended

Subpart C, Affirmative Action Program

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.40(b)	Applicability of the affirmative action program.	<p>A. Is your organization developing and maintaining an affirmative action program at each establishment within 120 days of the commencement of a federal contract?</p> <p>B. Does your affirmative action program set forth your policies and procedures in accordance with Section 503, Subpart C?</p> <p>C. Is your affirmative action program for Section 503, integrated into (not required) other affirmative action programs?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p> <p>C. ___ YES ___ NO</p>
§ 60-741.40(b)	Applicability of the affirmative action program.	<p>A. Does your organization's designated official review and update the affirmative action program on an annual basis?</p>	<p>A. ___ YES , date of next review ___</p> <p>B. ___ NO</p>
§ 60-741.41	Availability of affirmative action program.	<p>A. Does your organization make your affirmative action program (absent data metrics) available to employees or applicants for inspection upon request?</p> <p>B. Does your organization post at each establishment the location and hours during which the program may be obtained?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>
§ 60-741.42(a)	Invitation to Self-Identify: Pre-Offer.	<p>A. Does your organization invite each applicant at the pre-offer stage (i.e., when the applicant applies or is considered for employment) to voluntarily self-identify as an individual with a disability?</p> <p>B. If the invitation to self-identify is included with the application materials, is it separate from the application?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>
§ 60-741.42(a)	Invitation to Self-Identify: Pre-Offer.	<p>A. Does your organization invite each applicant at the pre-offer stage to voluntarily self-identify as an individual with a disability using the OMB-approved form posted on the OFCCP website? http://www.dol.gov/ofccp/regs/compliance/sec503/Voluntary_Self-Identification_of_Disability_CC-305_SD_Edit1.24.14.pdf</p>	<p>A. ___ YES ___ NO</p>
§ 60-741.42(b)	Invitation to Self-Identify Post-Offer.	<p>A. Does your organization invite each applicant at the post-offer stage (i.e., after an offer has been made but before the applicant begins his or her duties) to voluntarily self-identify as an individual with a disability?</p>	<p>A. ___ YES ___ NO</p>
§ 60-741.42(b)	Invitation to Self-Identify Post-Offer	<p>A. Does your organization invite each applicant at the post-offer stage to voluntarily self-identify as an individual with a disability using the OMB-approved form posted on the OFCCP website? http://www.dol.gov/ofccp/regs/compliance/sec503/Voluntary_Self-Identification_of_Disability_CC-305_SD_Edit1.24.14.pdf</p>	<p>A. ___ YES ___ NO</p>
§ 60-741.42(c)	Invitation to Self-Identify: Employees.	<p>A. Does your organization invite each of your employees to voluntarily inform you that he or she is an individual with a disability as defined in § 60-741.2(g)(1)(i) or (ii)?</p>	<p>A. ___ YES ___ NO</p>

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.42(c)	Invitation to Self-Identify: Employees.	<p>B. Did your organization invite each of your employees to inform you that he or she is an individual with a disability in the first year your organization became subject to the 503 regulations and at five year intervals, thereafter, using the language and manner prescribed by the OFCCP Director and published on the OFCCP Web site? http://www.dol.gov/ofccp/regs/compliance/sec503/Voluntary_Self-Identification_of_Disability_CC-305_SD_Edit1.24.14.pdf</p> <p>C. Does your organization at least once during the intervening years between these invitations, remind your employees that they may voluntarily update their disability status?</p>	<p>B. ___ YES ___ NO</p> <p>C. ___ YES ___ NO</p>
§ 60-741.42(e)	Invitation to Self-Identify: Confidentiality	<p>A. Does your organization keep all of the information on self-identification confidential and ensure that it is not provided to hiring officials?</p> <p>B. Does your organization maintain self-identification records in a separate data analysis file rather than in the personnel or medical files of individual employees?</p> <p>C. Does your organization recognize that it must provide self-identification information to OFCCP upon request?</p> <p>D. Does your organization recognize that it may only use the self-identification information in accordance with the section 503 rule?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p> <p>C. ___ YES ___ NO</p> <p>D. ___ YES ___ NO</p>
§ 60-741.42(g)	Invitation to Self-Identify: Liability for Discrimination	<p>A. Does your organization understand that nothing in this section shall relieve your organization from liability for discrimination in violation of section 503?</p>	<p>A. ___ YES ___ NO</p>
§ 60-741.43	Affirmative action policy.	<p>A. Does your organization's affirmative action policy include prohibitions against discrimination because of physical or mental disability?</p> <p>B. Does your organization's affirmative action policy include taking affirmative action to employ and advance in employment qualified individuals with disabilities at all levels, including the executive level?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>
§ 60-741.44(a)	Required contents of affirmative action programs – Policy Statement	<p>A. Does your organization have a disability-related equal opportunity (EO) policy statement included in your affirmative action program?</p> <p>B. Does your disability-related EO policy statement include language indicating that your organization will recruit, hire, train, and promote persons in all job titles and ensure that all other personnel actions are administered without regard to disability and ensure that all employment decisions are based only on valid job requirements?</p> <p>C. Does your disability-related EO policy statement indicate the support of your organization's top U.S. Executive (e.g., the Chief Executive Officer or the President of the U.S. Division of a foreign company) for your affirmative action program?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p> <p>C. ___ YES ___ NO</p>

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44(a)	Required contents of affirmative action programs – Policy Statement	<p>D. Does your disability related EO policy statement provide for an audit and reporting system?</p> <p>E. Does your disability related EO policy statement assign overall responsibility to one of your organization’s officials for the implementation of affirmative action activities and does this official’s identity appear on all internal and external communications regarding the company’s affirmative action program?</p> <p>F. Is the disability related EO policy statement posted on company bulletin boards?</p> <p>G. As needed, are applicants and employees with disabilities provided the notice in a form that is accessible and understandable to the individual with a disability, e.g., Braille, large print, or posting the notice at a lower height for a person using a wheelchair?</p>	<p>D. ___YES ___NO</p> <p>E. ___YES ___NO</p> <p>F. ___YES ___NO</p> <p>G. ___YES ___NO</p>
§ 60-741.44(a)	Policy Statement	A. Does your disability-related EO policy statement state that employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they engaged in filing a complaint?	A. ___YES ___NO
§ 60-741.44(a)	Policy Statement	A. Does your disability-related EO policy statement state that employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they engaged in assisting or participating in an investigation, compliance evaluation or other activity related to the administration of section 503 or any other Federal, State, or local law requiring equal opportunity for individual with disabilities?	A. ___YES ___NO
§ 60-741.44(a)	Policy Statement	A. Does your disability-related EO policy statement state that employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they engaged in opposing any act or practice made unlawful by section 503 or its implementing regulations in this part, or any other Federal, State or local law requiring equal opportunity for individuals with disabilities	A. ___YES ___NO
§ 60-741.44(a)	Policy Statement	A. Does your disability-related EO policy statement state that employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they engaged in exercising any other right protected by section 503 or its implementing regulations?	A. ___YES ___NO
§ 60-741.44 (b)	Review of personnel processes.	<p>A. Does your organization ensure that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available?</p> <p>B. Does your organization ensure that its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified?</p>	<p>A. ___YES ___NO</p> <p>B. ___YES ___NO</p>

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44 (b)	Review of personnel processes.	<p>C. Does your organization ensure that applicants and employees with disabilities have equal access to your personnel processes, including those implemented through information and communication technologies?</p> <p>D. Does your organization provide reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes?</p> <p>E. Does your organization make your information and communication technologies generally accessible, even absent a specific request for reasonable accommodation? [Encouraged but not required by the section 503 rule]</p> <p>F. Does your organization recognize that it may still have to provide a reasonable accommodation to an applicant or employee even if your information and communications technologies meet general accessibility standards?</p> <p>G. Does your organization periodically review such processes and make any necessary modifications to ensure that these obligations are carried out?</p> <p>H. Does your organization include in its affirmative action program a description of its review and any necessary modifications to personnel processes or development of new processes required under the regulations?</p> <p>I. Does your organization have procedures that facilitate a review of the implementation of this requirement by your organization?</p>	<p>C. ___YES ___NO</p> <p>D. ___YES ___NO</p> <p>E. ___YES ___NO</p> <p>F. ___YES ___NO</p> <p>G. ___YES ___NO</p> <p>H. ___YES ___NO</p> <p>I. ___YES ___NO</p>
§ 60-741.44(c)	Physical and mental qualifications.	<p>A. Does your organization have in its affirmative action program, and do you adhere to, a schedule for the review of all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified individuals with disabilities, they are job-related for the position in question and are consistent with business necessity?</p>	<p>A. ___YES ___NO</p>
§ 60-741.44(c)	Physical and mental qualifications.	<p>A. Does your organization ensure that the physical or mental qualification standards it uses (whether for hiring, promotion, training, or other change in employment status), to the extent they tend to screen out qualified individuals with disabilities, are consistent with business necessity and related to the specific job or jobs?</p> <p>B. Does your organization understand that if a qualification standard screens out, or tends to screen out, qualified individuals with disabilities it has the burden to demonstrate that the standard is job – related and consistent with business necessity?</p>	<p>A. ___YES ___NO</p> <p>B. ___YES ___NO</p>
§ 60-741.44(d)	Reasonable accommodation to physical and mental limitations.	<p>A. As a matter of nondiscrimination, does your organization make reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability unless you can demonstrate that the accommodation would impose an undue hardship on the operation of your business?</p>	<p>A. ___YES ___NO</p>

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44(d)	Reasonable accommodation to physical and mental limitations.	<p>B. As a matter of affirmative action, if an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, does your organization confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability?</p> <p>C. If the employee responds affirmatively, does your organization confidentially inquire whether the employee is in need of a reasonable accommodation?</p>	<p>B. ___YES ___NO</p> <p>C. ___YES ___NO</p>
§ 60-741.44(d)	Reasonable accommodation to physical and mental limitations.	A. Does your organization have written reasonable accommodation procedures? (**These are not required but are considered a best practice.)	A. ___YES ___NO
§ 60-741.44(e)	Harassment.	<p>A. Has your organization developed procedures to ensure that its employees are not harassed on the basis of disability?</p> <p>B. Has your organization implemented procedures to ensure that its employees are not harassed on the basis of disability?</p>	<p>A. ___YES ___NO</p> <p>B. ___YES ___NO</p>
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>A. Does your organization undertake appropriate outreach and recruitment activities such as those listed below that are reasonably designed to effectively recruit qualified individuals with disabilities?</p> <p>B. Does your organization send written notification of company policy related to its affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part?</p> <p>Examples of Outreach and Recruitment Activities:</p> <p>A. Has your organization enlisted the assistance and support of local, state and national organizations in recruiting and developing on the job training opportunities for individuals with disabilities to fulfill your commitment to provide equal employment opportunity for individuals with disabilities?</p>	<p>A. ___YES ___NO</p> <p>B. ___YES ___NO</p> <p>A. ___YES ___NO</p>
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>Examples of Activities (continued)</p> <p>Has your organization enlisted the assistance and support in your area of:</p> <p>A. State vocational rehabilitation agency?</p>	A. ___YES ___NO

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	B. State mental health agency? C. State developmental disability agency?	B. ___ YES ___ NO C. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area of: A. Employment One-Stop Career Center (One-Stop) or American Job Center?	A. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area of: A. The Department of Veterans Affairs Regional Office?	A. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area: A. Employer Assistance and Resource Network (EARN)?	A. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area of: A. Local Employment Network Organizations?	A. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area of: A. Local disability groups or organizations? B. Centers for Independent Living (CIL)?	A. ___ YES ___ NO B. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area of: A. Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities?	A. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) Has your organization enlisted the assistance and support in your area of: A. Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities?	A. ___ YES ___ NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	Examples of Practices (continued) A. Has your organization held (or planning to hold) formal briefing sessions, preferably on company premises, with representatives from recruiting sources?	A. ___ YES ___ NO

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>B. Do the formal briefing sessions your organization has organized (or is planning to organize) for representatives from recruiting sources include:</p> <ul style="list-style-type: none"> • B1 Facility tours, • B2 Clear and concise explanations of current and future job openings, position descriptions, and worker specifications, • B3 Explanations of the company's selection process, and • B4 Recruiting literature? <p>C. Is your organization's official in charge of your affirmative action program in attendance (or planning to be in attendance) at briefing sessions for recruiting sources?</p> <p>D. Is your organization developing (or planning to develop) formal arrangements with recruiting sources for:</p> <ul style="list-style-type: none"> • D1 referral of applicants, • D2 follow up with sources, and • D3 feedback on disposition of applicants? 	<p>B1. __YES __NO B2. __YES __NO B3. __YES __NO B4. __YES __NO C. __YES __NO D1. __YES __NO D2. __YES __NO D3. __YES __NO</p>
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>Examples of Practices (continued)</p> <p>A. Do your organization's recruitment efforts at all educational institutions incorporate specific efforts to reach students who are individuals with disabilities?</p>	A. __YES __NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>Examples of Practices (continued)</p> <p>A. Is your organization making an effort to participate in work-study programs for students, trainees, or interns with disabilities?</p>	A. __YES __NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>Examples of Practices (continued)</p> <p>A. Are individuals with disabilities made available for participation in career days, youth motivation programs, and related activities in their communities?</p>	A. __YES __NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>Examples of Practices (continued)</p> <p>A. Does your organization take any other positive steps it deems necessary to attract individuals with disabilities not currently in the work force who have requisite skills and can be recruited through affirmative action measures?</p>	A. __YES __NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>Examples of Practices (continued)</p> <p>A. When making hiring decisions, does your organization consider applicants who are known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is unavailable?</p>	A. __YES __NO
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>A. Does your organization on an annual basis review the outreach and recruitment efforts it has taken over the previous 12 months to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities?</p>	A. __YES __NO

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>B. Does your organization document each evaluation, including at a minimum, the criteria it used to evaluate the effectiveness of each effort and the contractor's conclusion as to whether each effort was effective?</p> <p>C. Does your organization maintain the two previous questions' data on the effectiveness of each of its outreach and recruitment efforts for the current year and the two most recent previous years?</p> <p>D. In light of these regulations, does your organization reasonably conclude that the totality of its outreach efforts are effective?</p> <p>E. If your organization concludes that the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, does it identify and implement alternative efforts as listed in 60-741.44 (f)(1) or (f)(2) of the regulation in order to fulfill its obligations?</p>	<p>B. ___ YES ___ NO</p> <p>C. ___ YES ___ NO</p> <p>D. ___ YES ___ NO</p> <p>E. ___ YES ___ NO</p>
§ 60-741.44(f)	External dissemination of policy, outreach and positive recruitment.	<p>A. Does your organization adhere to the recordkeeping obligation of the affirmative action program by documenting all activities it undertakes to comply with the obligations of this section?</p> <p>B. Does your organization retain these documents for a period of three (3) years?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>
§ 60-741.44(g)	Internal dissemination of policy.	<p>A. Does your organization internally communicate its affirmative action obligation to create a strong outreach program to employ and advance in employment individuals with disabilities?</p> <p>B. Are activities to create a strong outreach program to employ and advance in employment individuals with disabilities supported by executive, management, supervisory and other employees?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>
§ 60-741.44(g)	Internal dissemination of policy.	<p>A. Is the obligation to create a strong outreach program to employ and advance in employment individuals with disabilities included in your policy manual?</p> <p>B. If no, have you made the policy available to your employees by other means?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>
§ 60-741.44(g)	Internal dissemination of policy.	<p>A. If your company is party to a collective bargaining agreement, have you notified union officials and/or employee representatives of your obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities and requested their cooperation?</p>	<p>A. ___ YES ___ NO</p>
§ 60-741.44(g)	Internal dissemination of policy.	<p>A. Have you informed all employees and prospective employees of your commitment to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities? (This practice and the remainder of the practices described below under internal dissemination of policy are encouraged but not required.)</p> <p>B. Are you periodically scheduling meetings with all employees to inform them of your commitment to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities?</p>	<p>A. ___ YES ___ NO</p> <p>B. ___ YES ___ NO</p>

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.44(g)	Internal dissemination of policy.	C. Have you explained individual employees' responsibilities to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities?	C. ___YES ___NO
§ 60-741.44(g)	Internal dissemination of policy.	A. Have you publicized your commitment to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities in your company newspaper, magazine, annual report and other media?	A. ___YES ___NO
§ 60-741.44(g)	Internal dissemination of policy.	A. Have you conducted specific meetings with executive, management, and supervisory personnel to explain the intent of your commitment to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities and individuals' responsibility for effective implementation making clear the chief executive officer's support for the affirmative action policy?	A. ___YES ___NO
§ 60-741.44(g)	Internal dissemination of policy.	A. Have you discussed your commitment to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities in both employee orientation and management training programs?	A. ___YES ___NO
§ 60-741.44(g)	Internal dissemination of policy.	A. Are you including articles on accomplishments of individuals with disabilities in company publications?	A. ___YES ___NO
§ 60-741.44(g)	Internal dissemination of policy.	A. When employees are featured in employee handbooks or similar publications for employees, is your organization including individuals with disabilities? B. Are all of these procedures and activities to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities designed to foster understanding, acceptance and support among your organization's executive, management, supervisory, and other employees and to encourage such persons to take the necessary actions to aid your organization in meeting this obligation?	A. ___YES ___NO B. ___YES ___NO
§ 60-741.44(h)	Audit and Reporting System.	A. Has your organization designed and implemented an audit and reporting system to measure the effectiveness of your affirmative action program to employ and advance in employment qualified individuals with disabilities?	A. ___YES ___NO
§ 60-741.44(h)	Audit and Reporting System.	A. Does your audit and reporting system measure the effectiveness of your affirmative action program?	A. ___YES ___NO
§ 60-741.44(h)	Audit and Reporting System.	A. Does your organization's audit and reporting system indicate any need for remedial action?	A. ___YES ___NO
§ 60-741.44(h)	Audit and Reporting System.	A. Does your organization's audit and reporting system determine the degree to which your affirmative action objectives have been attained?	A. ___YES ___NO
§ 60-741.44(h)	Audit and Reporting System.	A. Does your organization's audit and reporting system determine whether known individuals with disabilities have had the opportunity to participate in all company sponsored educational, training, recreational, and social activities?	A. ___YES ___NO
§ 60-741.44(h)	Audit and Reporting System.	A. Does your organization's audit and reporting system measure your compliance with the affirmative action program's specific obligations?	A. ___YES ___NO

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§ 60-741.44(h)	Audit and Reporting System.	Does your organization document the actions taken to comply with these audit and reporting obligations? And does your organization retain these documents as employment records subject to the recordkeeping requirements of § 60-741.80?	A. ___ YES ___ NO
§ 60-741.44(h)	Audit and Reporting System.	A. Did your organization undertake necessary action to bring the affirmative action program into compliance if it was found to be deficient as a result of the self-audit?	A. ___ YES ___ NO
§ 60-741.44(i)	Responsibility for implementation.	A. Has your organization assigned an official of your organization to be responsible for implementation of your affirmative action activities to employ and advance in employment qualified individuals with disabilities? B. Does the assigned official's identity appear on all internal and external communications regarding the company's affirmative action program? C. Has this official been given necessary senior management support and staff to manage the implementation of the affirmative action program?	A. ___ YES ___ NO B. ___ YES ___ NO C. ___ YES ___ NO
§ 60-741.44(j)	Training.	A. Has your organization trained all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure implementation of the commitments in the contractor's affirmative action program?	A. ___ YES ___ NO
§ 60-741.44(k)	Data Collection Analysis.	Does your organizations document the following computations and comparisons on an annual basis and maintained these data for a period of 3 years? A. The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities B. The total number of job openings and total number of jobs filled C. The total number of applicants for all jobs D. The number of applicants with disabilities hired for all jobs E. The total number of applicants hired for all jobs	A. ___ YES ___ NO B. ___ YES ___ NO C. ___ YES ___ NO D. ___ YES ___ NO E. ___ YES ___ NO
§ 60-741.45(a)	Goal.	<i>If organization has 100 or fewer employees:</i> A. Does your organization either apply a 7% utilization goal across the entire workforce OR for each job group (or trade group) in the organization's workforce? <i>If organization has more than 100 employees:</i> A. Does your organization apply a 7% utilization goal for each job group (or trade group) in the organization's workforce?	A. ___ YES ___ NO A. ___ YES ___ NO

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.45(d)	Utilization analysis.	<p><i>If organization is applying utilization goals for each job group (see above).</i></p> <p>A. Is your organization applying the same job groups established for utilization analysis under Executive Order 11246, either in accordance with the supply and service contractor requirements at 41 CFR 60-2.12, or in accordance with the construction contractor requirements at 41 CFR part 60-4, as appropriate?</p>	A. ___YES ___NO ___N/A
§ 60-741.45(d)	Utilization analysis.	<p>A. Is your organization annually evaluating its utilization of individuals with disabilities in each job group?</p> <p><i>A. For those contractors with 100 or fewer employees, is your organization annually evaluating its utilization of individuals with disabilities in your entire workforce (permitted instead of using job categories)?</i></p>	A. ___YES ___NO
§ 60-741.45(e)	Identification of problem areas.	<p>A. When the percentage of individuals with disabilities in one or more job groups, or in your organization's entire workforce, is less than the utilization goal, does your organization take steps to determine whether and where impediments to equal employment opportunity exist?</p> <p>B. When making this determination, does your organization assess its:</p> <p>B1. Personnel processes?</p> <p>B2. The effectiveness of its outreach and recruitment efforts?</p> <p>B3. The results of its affirmative action program audit?</p> <p>B4. Any other areas that might affect the success of the affirmative action program?</p>	<p>A. ___YES ___NO</p> <p>B1. ___YES ___NO</p> <p>B2. ___YES ___NO</p> <p>B3. ___YES ___NO</p> <p>B4. ___YES ___NO</p>
§ 60-741.45(f)	Action-oriented programs.	A. When the organization identifies problem areas, does it develop and execute action-oriented programs designed to correct any identified problem areas?	A. ___YES ___NO
§ 60-741.46(a)	Voluntary affirmative action programs for employees with disabilities.	A. Does your organization recognize that it is permissible to develop and implement voluntary training and employment programs for people with disabilities?	A. ___YES ___NO
§ 60-741.46(a)	Voluntary affirmative action programs for employees with disabilities.	<p>A. Does your organization have a voluntary affirmative action program for employees with disabilities?</p> <p>B. If so, does your organization include an annual report describing your voluntary affirmative action program and the outcomes achieved in your affirmative action program?</p>	<p>A. ___YES ___NO</p> <p>B. ___YES ___NO ___N/A</p>

Regulation Section	Regulation Title	Compliance Questions	Compliance Responses
§ 60-741.47	Sheltered workshops.	<p>A. If your organization has contracts with sheltered workshops, does it understand that</p> <ul style="list-style-type: none"> • Contracts with sheltered workshops do not constitute affirmative action in lieu of employment and advancement of qualified individuals with disabilities in the contractor's own workforce? • If a sheltered workshop is training people to be employees of your organization, such trainees are not to be included in your organization's utilization analysis or counted toward the 7% goal because they are not part of your organization's workforce • Only after the trainees become employees of your organization, and are receiving the same compensation as other employees, may you count these employees toward your utilization goal. <p>B. If your organization pays some of its own employees under a FLSA 14(c) certificate, does it understand that</p> <ul style="list-style-type: none"> • If the organization has over 100 employees, it can only count these employees toward the goal for the job group in which they are employed. 	<p>A. <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p> <p>B. <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> N/A</p>