



**AFFIRMATIVE ACTION PROGRAM  
MANDATORY FULL ANNUAL AUDIT – Checklist**

**Company:** \_\_\_\_\_ **AAP Year:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Part I. Affirmative Action Program Content**

<b>Comply? Yes/No</b>	<b>Item</b>	<b>Comment / Responsible / Date of Activity</b>
	<p><b>AAP Narratives:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Executive Order 11246 Affirmative Action Program for Woman and Minorities* – Narrative</li> <li><input type="checkbox"/> Section 503 Affirmative Action Program for Workers with Disabilities – Narrative</li> <li><input type="checkbox"/> VEVRAA Affirmative Action Program for Protected Veterans – Narrative</li> </ul>	<p>*AAP for Minorities is not required for facilities located in Puerto Rico</p>
	<p><b>Affirmative Action Program Exhibits: (Exhibits are excluded from disclosure)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Organizational Profile or Workforce Analysis</li> <li><input type="checkbox"/> Executive Order 11246 Job Group Analysis</li> <li><input type="checkbox"/> Availability Analysis and Goal Placement for Females</li> <li><input type="checkbox"/> Utilization Analysis and Goals for Females</li> <li><input type="checkbox"/> Summary of Transactions (all that apply)               <ul style="list-style-type: none"> <li><input type="checkbox"/> Summary of Applicants</li> <li><input type="checkbox"/> Summary of Hires</li> <li><input type="checkbox"/> Summary of Promotions</li> <li><input type="checkbox"/> Summary of Demotions</li> <li><input type="checkbox"/> Summary of Transfers</li> <li><input type="checkbox"/> Summary of Terminations</li> <li><input type="checkbox"/> Other summaries that may apply</li> </ul> </li> <li><input type="checkbox"/> Report on Prior Year Goals for Females and Minorities* (if not the first AAP)</li> <li><input type="checkbox"/> Outreach and Positive Recruitment Activities</li> <li><input type="checkbox"/> VEVRAA and Section 503 Self-Audit Form</li> <li><input type="checkbox"/> VEVRAA and Section 503 Data Collection Requirement: Job Applicants Vs Job Filled Data</li> <li><input type="checkbox"/> Utilization Analysis and Goals for IWDs and Benchmark for Protected Veterans</li> </ul>	<p>*Goals for Minorities are not required for facilities located in Puerto Rico.</p>

	<input type="checkbox"/> EEO Policy (including “Pay Transparency” new mandatory paragraph)	
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**Part II. Affirmative Action Program Supporting Documents: (in separate file from AAP)**

**Subpart A: EEO Policy Dissemination**

<b>Comply? Yes/No</b>	<b>Item</b>	<b>Comment / Responsible / Date of Activity</b>
	<input type="checkbox"/> EEO Policy Memorandum and evidence of internal dissemination: Original Letter, list of all recipients, date of delivery, any other supporting document that provide evidence of this mandatory activity. List of all conspicuous places where the EEO Policy Memorandum is being published.	
	<input type="checkbox"/> Letters to Suppliers (Annual mandatory policy dissemination): Original Letter, list of all recipients, date of delivery, any other supporting document that provide evidence of this mandatory activity.	
	<input type="checkbox"/> Letter to Recruitment Sources (Annual mandatory policy dissemination): Original Letter, list of all recipients, date of delivery, and any other supporting documents that provide evidence of this mandatory activity.	
	<input type="checkbox"/> Letter to Headhunters and External Recruiters: (Annual mandatory policy dissemination): Original Letter, list of all recipients, date of delivery, and any other supporting documents that provide evidence of this mandatory activity.	
	<input type="checkbox"/> Job Advertisement Template: Make sure template contains the EEO and Affirmative Action mandatory tag line.	
	<input type="checkbox"/> “Print Screen” of company website where the EEO Policy is being displayed (If apply)	
	<input type="checkbox"/> Copy of Purchase Order with EEO and AAP Mandatory Tagline in bold font.	
	<input type="checkbox"/> Any other evidence of EEO policy external or internal dissemination (If apply)	

**Subpart B: Mandatory Job Listings Supporting Documents (in separate file from AAP)**

Comply? Yes/No	Item: FOR <u>EACH</u> EXTERNAL JOB POSTING, PLEASE PROVIDE:	Comment / Responsible / Date of Activity
	<input type="checkbox"/> Evidence of Letters sent to the Local Department of Labor, Local Office of Veterans Affairs, and Local Vocational Rehabilitation Centers	
	<input type="checkbox"/> Evidence of Department of Labor official form (“orden de empleo” for PR) sent to local officials	
	<input type="checkbox"/> Evidence of Job Posting within the US.jobs / <i>Puerto Rico Job Bank</i> website / or equivalent.	
	<input type="checkbox"/> Copy of Job Posting	
	<input type="checkbox"/> Copy of Job Advertisement (with EEO and AAP tag line included)	
	<input type="checkbox"/> Any other Mandatory Job Listings Supporting Documents and communications for each specific job posting.	

**Subpart C: Evidence of Affirmative Action Program Activities (in separate file from AAP)**

Comply? Yes/No	Item:	Comment / Responsible / Date of Activity
	<input type="checkbox"/> Copy of mandatory annual AAP Management Training for all managers and supervisors: Including: a copy of the presentation or handout material; a list of participants (attendance signatures if apply); or evidence of virtual training with date of delivery including a list of participants, quiz scores (if apply), and any other evidence of the AAP training activity that may apply.	
	<input type="checkbox"/> Evidence of annual internal audit: Includes audit form, notations, actions taken and responsible for all implementation activities.	
	<input type="checkbox"/> Evidence of annual I-9 Form random inspections and actions taken, and E-Verify random inspection (for E-Verify users only).	
	<input type="checkbox"/> Evidence of annual ADA physical inspection of facilities: Date of inspection: _____ <input type="checkbox"/> handicap parking spaces (1 disability parking for every 25 regular spaces)	

	<input type="checkbox"/> Accessible entrance, restrooms, ramps, common areas (cafeteria, kitchens, dining spaces, waiting rooms, and receptions).	
	<input type="checkbox"/> Vets-4212 Forms for the last three years: provide evidence of submission and confirmation e-mail for each year.	
	<input type="checkbox"/> EEO-1 Report* for the last three years: provide evidence of submission and confirmation.	Note: No EEO-1 reports should be filed for establishments located in PR, USVI and Other US Protectorates
	<input type="checkbox"/> Applicant Tracking System annual evaluation (if apply)	
	<input type="checkbox"/> Copy of Mid-Year Report (Report on progress on goals within the first 6 months of AAP implementation)	
	<input type="checkbox"/> Evidence of the <i>Invitation to Self-Identify Workers with Disabilities and Protected Veterans <u>CENSUS ACTIVITY</u></i> (this activity took place once after the 2014 Section 503/ VEVRAA New Regulations). You should have a separate file containing all identification forms (one for each employee).	
	<input type="checkbox"/> Evidence of Invitations to <i>Self-Identify Race and Gender, Workers with Disabilities, and Protected Veterans - POST OFFER invitation- to <u>NEW HIRES</u></i> . You should have a separate file containing all identification forms for all <i>NEW HIRES</i> after March 24, 2014	
	<input type="checkbox"/> Evidence of Invitations to <i>Self-Identify Race and Gender, Workers with Disabilities, and Protected Veterans - PRE- OFFER invitation - to <u>ON-LINE APPLICANTS</u></i> (or considered applicants for employment). You should have a separate file containing all identification forms for all <i>APPLICANTS</i> (or considered applicants) after March 24, 2014	
	<input type="checkbox"/> Please verify EEO Logs regularly to ensure all activities are being recorded including: Job Description Verification or Update Log, Religious Accommodations –Logs, Outreach and Recruitment Activities –Log, Reasonable Accommodation Log, and any other recruitment and selection logs that may apply.	

**Subpart D: Employee file internal audit considerations:**

Comply? Yes/No	Item:	Comment / Responsible / Date of Activity
	<input type="checkbox"/> Please ensure all Job Posting Files contains: interview notes, resumes, employment applications, employment test scores (validated only), among other required documents. Make sure the Job Posting Files are consonant with the applicant and hire logs.	

**Subpart E: Annual Compensation Review**

Comply? Yes/No	Item:	Comment / Responsible / Date of Activity
	<input type="checkbox"/> Compensation Policies: Provide documentation and policies related to compensation practices: Include factors and reasoning used to determine compensation	
	<input type="checkbox"/> Annual Pay Equity Analysis: Provide evidence of the audit. Make sure differences are explained and work problem areas with legal advisors (under attorney-client privilege).	
	<input type="checkbox"/> Perform annual exercise for gathering compensation data to make sure you can satisfy Compliance Review's Item 19 in a timely matter.	

**Subpart F: Other Logs, Policies and Procedures:**

Comply? Yes/No	Item:	Comment / Responsible / Date of Activity
	<input type="checkbox"/> <i>Outreach and Recruitment Efforts Log</i> and evidence of annual evaluation of the effectiveness of the efforts to recruit individuals with disabilities and veterans.	
	<input type="checkbox"/> Reasonable Accommodation policies, and <i>Reasonable Accommodation Annual Log</i> (List of accommodation requests received and their resolution, if any)	

	<input type="checkbox"/> <i>Job Description Revision Log</i> : Evidence of the most recent assessment of physical and mental qualifications, including date of assessment, actions taken and changes made to job descriptions.	
	<input type="checkbox"/> Documentation on the most recent assessment of personnel processes, including date of annual assessment, actions taken or changes made as a result of the assessment (if any).	

**Annual Audit to Headhunters and Recruitment Agencies:**

Comply? Yes/No	Item: Annual Audit must be performed to all recruitment agencies	Comment / Responsible / Date of Activity
	<input type="checkbox"/> Self-Identification Forms for all <u>applicants</u> that were considered for employment within our facilities: Self Id for Veterans (use pre-offer form), Workers with Disabilities, Race, and Gender	
	<input type="checkbox"/> Self-Identification Forms for all <u>employees hired for temporary positions</u> within our facilities: Self Id for Veterans (use post offer form), Workers with Disabilities, Race, and Gender	
	<input type="checkbox"/> List of all candidates considered for employment within our facilities.	
	<input type="checkbox"/> Interview notes, resumes, and employee applications for all candidates considered for employment within our facilities	
	<input type="checkbox"/> Evidence or certification of validation of pre-employment tests. Our company does not approve the use of pre-employment tests that are not validated. For more information visit: <a href="https://www.eeoc.gov/policy/docs/factemployment_procedures.html">https://www.eeoc.gov/policy/docs/factemployment_procedures.html</a>	

**Other Compliance Aspects:**

Comply? Yes/No	Item:	Comment / Responsible / Date of Activity
	<input type="checkbox"/> Inspection of nursing room	
	<input type="checkbox"/> Inspection of mandatory posters located in conspicuous places throughout the facilities	

<input type="checkbox"/>	EEO Memorandum visible at reception area	
<input type="checkbox"/>	EEO Memorandum visible in bulletin boards	
<input type="checkbox"/>	Evidence of follow up emails regarding Affirmative Action goals and benchmarks to management team (at least twice a year)	
<input type="checkbox"/>	Consistency and accuracy on the use of E-Verify (if apply)	
<input type="checkbox"/>	Religious accommodation log is available for inspection (if apply)	
<input type="checkbox"/>	NLRA poster is visible, NLRA tag line for Purchase Orders are displayed (if apply)	
<input type="checkbox"/>	Maternity leave, and sick leave documentation is ready for inspection	
<input type="checkbox"/>	Census for Veterans and Workers with disabilities was performed on: (date) _____	
<input type="checkbox"/>	The next census is due on (date): _____ (Census must be performed every 5 years)	
<input type="checkbox"/>	AAP Certification on OFCCP Contractor Portal Most current AAP Certification Date: _____ (Construction Contractors: Check for NCAP Notification Status)	

<b>AAP Period:</b>	
<b>Date of AAP Internal Record Keeping Audit:</b>	
<b>Completed by:</b>	
<b>Approval Signature:</b>	
<b>Closing Remarks:</b>	