

THE NATIONAL LAW REVIEW

OFCCP CSALs Are Just Around the Corner, Including Section 503 Focused Reviews

Thursday, February 14, 2019

With the posting of [2019 CSAL notices possibly imminent](#), government contractors should prepare for the fact that a portion (approximately 500 out of 3,500 total) of the OFCCP's FY 2019 compliance evaluations will be [Section 503 focused reviews](#). Attached is the [scheduling letter](#) that will be used for OFCCP's focused reviews.

Unlike the typical OFCCP audit, a focused review will audit contractor's compliance with the protections for individuals with disabilities under Section 503 of the Rehabilitation Act. Because Section 503 compliance has not been the focus of many of OFCCP's recent compliance audits, it is important that contractors should proactively self-audit to ensure they are in compliance with all of the various requirements of Section 503.

If a contractor receives a Section 503 focused review scheduling letter, it will have 30 days to collect and provide OFCCP with an array of information about its Section 503 compliance efforts. In order to effectively respond to and avoid violations, covered government contractors should review their Section 503 compliance to ensure they have the following for their current affirmative action plan year:

- A current Section 503 affirmative action plan for individuals with disabilities.
- An assessment of outreach and recruitment efforts for qualified individuals with disabilities. This assessment is typically prepared separate from the contractor's affirmative action plan and some vendors and firms do not include this assessment with the Section 503 affirmative action plans they prepare.
- The actions taken to audit and measure the effectiveness of the contractor's Section 503 affirmative action plan. Like the assessment of outreach and recruitment, this usually is separate from the affirmative action plan and may not have been prepared by your vendor or firm.
- The statistical data collected and retained by the contractor for the total number of job openings and jobs filled, the total number of applicants hired, the total number of applicants with disabilities hired, and the total number of applicants who identify as individuals with disabilities.
- The contractor's utilization analysis, evaluating the representation of individuals with disabilities across its job groups or workforce.
- The contractor's reasonable accommodation policies and documentation of any accommodation requests received and how the requests were resolved.
- The contractor's assessment of its personnel processes and use of physical and mental qualifications.

Also, contractors should be prepared to demonstrate, through a walkthrough, that its facilities comply with federal accessibility requirements.



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