Published on The National Law Review https://natlawreview.com

BREAKING NEWS: OFCCP Releases First CSAL of 2019

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Today, OFCCP issued its first <u>Corporate Scheduling Announcement List (CSAL)</u> of 2019, providing advance notification of compliance reviews, including CMCEs, Section 503 Focused Reviews and compliance checks. True to expectations, the Agency vastly increased the number of locations subject to review to more than 3,500.

OFCCP continued its new policy of transparency by publishing the list of contractors undergoing reviews on its website. Contractors should review the CSAL as OFCCP, for the first time, will no longer send individual CSALs through the mail. Listed contractors should instead receive notice through e-mail. Today's OFCCP CSAL publication starts a 15-day clock until Agency may begin issuing scheduling letters on April 9. Selected contractors should prepare now for upcoming audits.

Notably, this CSAL includes OFCCP's first round of five-hundred <u>Section 503 Focused Reviews</u> of contractor's corporate headquarters. These reviews will include an on-site review of policies, procedures, and documentation of affirmative action obligations for individuals with disabilities. In late 2018, OFCCP released a revised scheduling letter in anticipation of <u>Section 503 Reviews</u>, which requires submitting a subset of the data provided in a traditional review.

Here is a breakdown by the numbers:

- 1208 unique companies,
- 2345 Establishment Compliance Reviews,
- 500 Compliance Checks,
- 500 Section 503 Focused Reviews,
- 83 CMCEs, and
- 72 FAAP functional units

OFCCP also released its updated <u>scheduling methodology</u> as well as <u>CSAL</u> and <u>CMCE FAQs</u>. We will continue to monitor OFCCP developments, particularly those surrounding audits and implementation of the Agency's <u>numerous 2018 Directives</u>.

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National Law Review, Volume IX, Number 84

Source URL: https://natlawreview.com/article/breaking-news-ofccp-releases-first-csal-2019