

New OFCCP Guidance on Portal Registration for Higher Education Institutions

Article By:

Laura A. Mitchell

Christopher T. Patrick

OFCCP's regulations were designed for the typical private sector contractor. As a result, higher educational institutions, particularly colleges and universities, often struggle with fitting their "round pegs" processes into the "square holes" that OFCCP designed. [OFCCP's Contractor Portal](#) is no exception.

The Portal identifies employer establishments based on EEO-1 Reports filed from 2018. But higher educational institutions file Integrated Postsecondary Education Data System (IPEDS) Reports, not EEO-1 Reports. This disconnect left many educational institutions to apply their best judgement to define its establishments when registering in the Portal—and increased the burden on these contractors when creating new accounts within the Portal.

Perhaps to address such issues, on August 25, OFCCP issued [updated guidance](#) that better fit its requirements to higher educational institutions' processes. Under this new guidance, higher educational institutions should register in the Portal using their IPEDS Unit Identification, rather than the unit identifier from an EEO-1 Report.

The Agency has also updated its [Contractor Portal User Guide](#) with a new "Educational Institutions Registration" section and nine new "Figures" to assist educational institutions in the Portal's administrative process.

OFCCP has also issued a [new FAQ](#) to assist educational institutions navigate the process:

4. How do educational institutions register in the Contractor Portal?

Educational institutions register using their Integrated Postsecondary Education Data System (IPEDS) unique identification number (UNITID or IPEDS ID) and Employer Identification Number (EIN). Educational institutions may develop a single AAP or multiple AAPs, depending on their organizational structure. To account for these flexibilities and possible variations in AAP development, educational institutions will certify compliance for all AAPs associated with their 6-digit IPEDS ID.

Interestingly, this procedural guidance also reinforces other substantive guidance for educational institutions. For example, this new FAQ confirms the guidance from OFCCP's [Educational Institutions Technical Assistance Guide](#) and [campus-like setting guidance](#) that campus environments may appropriately be considered separate establishments—therefore, permitting multiple AAPs to cover a single campus.

As a result, educational institutions may want to consider whether their operations would support—and their organizational objectives may strategically benefit from—developing multiple affirmative action programs and [certifying each separately in OFCCP's Portal](#).

Jackson Lewis P.C. © 2025

National Law Review, Volume XII, Number 243

Source URL: <https://natlawreview.com/article/new-ofccp-guidance-portal-registration-higher-education-institutions>