

Office of Federal Contract Compliance Program (OFCCP) Revised Scheduling Letter Approved

Article By:

Laura A. Mitchell

Although no copy has yet been made available, [OFCCP has announced](#) that the Office of Management and Budget (OMB) has approved a revised scheduling letter and the itemized listing of documents and data required to be submitted at the outset of an OFCCP desk audit.

According to the Notice, the new scheduling letter will contain a number of substantive changes:

- **Individualized Compensation Data:** Most significantly, contractors may no longer submit annualized, aggregate compensation data. Rather, contractors must provide individualized employee compensation data as of the date of the workforce analysis in their AAP, including job title, job group and EEO-1 category.
- **Definition of Compensation:** Compensation data to be submitted now includes hours worked, incentive pay, merit increases, locality pay, and overtime.
- **Job Group or Job Title, But Not Both:** Contractors may continue to submit personnel activity data by Job Group or Job Title. The scheduling letter amendments proposed in 2011 would have required submission of data by both Job Group and Job Title.
- **Minority Sub-Groups:** Rather than identifying applicants and employees by “minority” and “non-minority,” contractors must provide specific race or ethnicity for each using the five categories of the Uniform Guidelines on Employee Selection Procedures.
- **VEVRAA & Section 503 Changes:** The revised scheduling letter incorporates the changes to the VEVRAA and Section 503 regulations, including new data collection, recordkeeping and reporting requirements.
- **Electronic format:** Data must be provided electronically if it is maintained in an electronic format which is “useable and readable.”

As soon as we have the opportunity to review the new scheduling letter and itemized listing we’ll provide a copy and an updated analysis so stay tuned for more.

National Law Review, Volume IV, Number 274

Source URL: <https://natlawreview.com/article/office-federal-contract-compliance-program-ofccp-revised-scheduling-letter-approved>