

# Regulatory Compliance Checklist

## Regulatory Obligations<sup>1</sup>

Scope and Applicability of Regulatory Obligations for Supply & Service (Sub)Contractors and Direct Federal (Sub)Construction Contractors*		
	Section 503	VEVRAA
<b>Basic Coverage</b> (General non-discrimination provisions)	A contract > \$20,000 and any number of employees	A \$200,000+ contract and any number of employees
<b>AAP Coverage</b> (Requirements to develop and maintain AAPs)	A \$50,000+ contract and 50+ employees	A \$200,000+ contract and 50+ employees

\*Requirements under Section 503 and VEVRAA do not apply to federally assisted construction contractors.

Compliance Item	Responsibility	Required Under	
		Section 503	VEVRAA
<b>Contract and Purchase Order References</b>			
<p><input type="checkbox"/> <b>Confirm equal opportunity clause</b> included in all government contracts, subcontracts, and purchase orders. Provide notice to external staffing or vendors providing recruiting services. <i>Reference must be in <b>bold</b> typeface.</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Confirm citation and inclusion of language in section <b>741.5(a)</b> of <b>41 CFR 60 Rule</b> (Section 503).</li> <li><input type="checkbox"/> Confirm citation and inclusion of language in section <b>300.5(a)</b> of <b>41 CFR 60 Rule</b> (VEVRAA).</li> <li><input type="checkbox"/> Confirm reference made to <a href="#">EO 13496</a> (<a href="#">29 CFR Part 471 Appendix A</a>) - Notification of Employee Rights Under Federal Labor Laws, if applicable.</li> </ul>	 Procurement/HR/ Compliance/Legal	<a href="#">60-741.5(a)</a>	<a href="#">60-300.5(a)</a>
<b>Job Listings and Postings/Notices</b>			
<p><input type="checkbox"/> <b>Confirm any solicitation for employment (internal and external), placed by or on behalf of the contractor,</b> includes the equal opportunity clause with references for disability status and protected veteran.</p> <p style="padding-left: 20px;"><b>Minimally acceptable EEO tagline:</b> “EOE – Disability/Vet” or “EEO Employer – Disability/Vet”.</p> <p><input type="checkbox"/> <b>As a best practice, regularly screenshot a recent job posting with EEO Tagline</b> and save for documentation purposes.</p>	 HR/Talent Acquisition	<a href="#">60-741.5(a)(7)</a>	<a href="#">60-300.5(a)(12)</a>

<sup>1</sup> In January 2025, President Trump signed an Executive Order, Ending Illegal Discrimination And Restoring Merit-Based Opportunity, that revokes EO 11246. DCI Consulting provides separate resources on the revoked and new obligations.

<input type="checkbox"/> <b>Confirm labor unions are notified</b> of non-discrimination obligations and provide equal opportunity policy.	 HR/Compliance	<a href="#">60-741.5(a)(5); see also 60-741.44(g)(2)(ii)</a>	<a href="#">60-300.5(a)(10); see also 60-300.44(g)(2)(ii)</a>
<input type="checkbox"/> <b>Ensure the <a href="#">Know Your Rights</a> poster is current with a physical <u>and</u> electronic version available</b> (i.e., ensure notice is linked as part of applications and for employees working remotely).  Note: As of the date of the checklist, some posters are being revised to comply with Executive Order, " <a href="#">Defending Women From Gender Ideology Extremism And Restoring Biological Truth To The Federal Government – The White House</a> ".  <input type="checkbox"/> <b>Confirm other federal and/or state employment posters</b> are displayed as required: <a href="https://www.dol.gov/general/topics/posters">https://www.dol.gov/general/topics/posters</a> , including "Notification of Employee Rights Under Federal Labor Laws" ( <a href="#">EO 13496</a> ).	 HR/Compliance	<a href="#">60-741.5(a)(4)</a>	<a href="#">60-300.5(a)(9)</a>
<input type="checkbox"/> <b>List external job openings</b> with the applicable state/local Employment Service Delivery System (ESDS), such as state or local career agencies, state job banks, and local One-Stop Career Centers. Does not include any openings that are for Executive or Senior Manager positions, internal-only positions, or positions that will last 3 days or less.  <a href="#">Learn how DCI can help with this requirement.</a>  <input type="checkbox"/> <b>Confirm the state office has contact information</b> for the contractor official responsible for hiring at each location and that they know you are a federal contractor that desires priority referrals of veterans.  <a href="#">Find your state's ESDS here.</a>	 Talent Acquisition		<a href="#">60-300.5(a)(2-6)</a>
<input type="checkbox"/> <b>Accessibility statement: advertise how employees and/or applicants</b> can request needed accommodations ( <i>"If you are a person with a disability needing assistance with the application process, please email <a href="#">xxxx@xxxx.com</a> or call xxx-xxx-xxxx."</i> ).  <input type="checkbox"/> <b>Confirm the website is accessible</b> for individuals with disabilities.	 HR/Compliance/ Talent Acquisition	<a href="#">41 CFR Appendix-B-to-Part-60-741.1</a>	

Policy Statements			
<p><input type="checkbox"/> <b>Equal opportunity policy statement should include:</b> (1) cite CEO’s (or most senior U.S. executive’s) support, (2) address an audit and reporting system, (3) assign overall responsibility for implementation of activities, (4) state all personnel actions are administered without regard to protected veteran/disability status,* (5) ensure all employment decisions are based only on valid job requirements, and (6) applicants and employees will not be subject to retaliatory discriminatory behavior.</p> <p><i>*DCI narratives summarize this information</i></p> <p><input type="checkbox"/> <b>Confirm equal opportunity policy statement is posted and available</b> for all applicants and employees and is provided in a format that is “accessible and understandable” to individuals with disabilities and protected veterans.</p> <p><input type="checkbox"/> <b>As a best practice, regularly screenshot the equal opportunity policy presented to applicants as part of the application process</b> and save for documentation purposes.</p>	 HR/Compliance	<a href="#">60-741.44(a)</a> and <a href="#">741.5(a)(4)</a>	<a href="#">60-300.43</a> ; see also <a href="#">60-300.44(a)</a> and <a href="#">300.5(a)(9)</a>
<p><input type="checkbox"/> <b>Ensure equal opportunity policy</b> is either in the company policy manual or otherwise made available to employees.</p>	 HR/Compliance	<a href="#">60-741.44(g)(2)(i)</a>	<a href="#">60-300.44(g)(2)(i)</a>
<p><input type="checkbox"/> <b>Internal Dissemination of Policy</b> (encouraged):</p> <ul style="list-style-type: none"> <li>• Inform all employees/prospective employees of commitment to engage in non-discrimination for protected veterans and individuals with disabilities;</li> <li>• Publicize it in the company media;</li> <li>• Conduct special meetings with management to explain intent of policy and individual responsibility for effective implementation, making clear the chief executive officer's support for the policy;</li> <li>• Discuss policy in employee orientation and management training programs;</li> <li>• Include articles on accomplishments of individuals with disabilities in company publications; and</li> <li>• When employees are featured in employee handbooks or publications for employees, include disabled veterans and individuals with disabilities.</li> </ul>	 HR/Compliance	<a href="#">60-741.44(g)</a>	<a href="#">60-300.44(g)</a>
<p><input type="checkbox"/> <b>Confirm equal opportunity policy statement and efforts</b> are sent to all subcontractors, vendors, and suppliers, and request cooperation and appropriate action on their part.</p>	 HR/Compliance	<a href="#">60-741.44(f)(1)(ii)</a> ; see also <a href="#">60-741.5(d)</a>	<a href="#">60-300.44(f)(1)(ii)</a> ; see also <a href="#">60-300.5(d)</a>

<p><input type="checkbox"/> <b>Develop and implement procedures to ensure employees are not harassed</b> because of their status as a protected veteran or an individual with a disability.</p> <p><input type="checkbox"/> <b>Deliver up-to-date training to all managers</b> on protected class harassment and related policies (<i>as part of audit and reporting system best practices</i>).</p>	 HR/Compliance	60- <a href="#">741.44(e)</a>	<a href="#">60-300.44(e)</a>
<p><input type="checkbox"/> <b>Develop, implement and review policies as needed</b> (<i>as part of the audit and reporting system best practices</i>).</p>	 HR/Compliance	60- <a href="#">741.44(h)</a>	<a href="#">60-300.44(h)</a>
<b>Accommodation Process</b>			
<p><input type="checkbox"/> <b>Confirm reasonable accommodation is provided</b> to ensure applicants and employees with disabilities have equal access to personnel processes.</p> <p><input type="checkbox"/> <b>Contractors are encouraged but not required</b> to develop written policies/procedures for processing requests for accommodation for disabled applicants/employees.</p> <p><input type="checkbox"/> <b>Maintain documentation for all accommodation requests that are made.</b> <i>Recommend including a request form as part of the accommodation process.</i></p>	 HR/Compliance	60- <a href="#">741.44(d)</a>	<a href="#">60-300.44(d)</a>
<b>Applicant Tracking, Recruiting, and Recordkeeping</b>			
<p><input type="checkbox"/> <b>Train all recruiters and hiring managers</b> in EEO and recordkeeping.</p>	 HR/Compliance	<a href="#">60-741.44(j)</a>	<a href="#">60-300.44(j)</a>
<p><input type="checkbox"/> <b>Confirm applicant tracking</b> is collecting number of applicants who self-ID as protected veterans and/or individuals with a disability, total number of job openings, total number of jobs filled, total number of applicants, number of applicants hired who are protected veterans and/or individuals with a disability, and total number of applicants hired.</p> <p><i>DCI reports capture this information.</i></p> <p><input type="checkbox"/> <b>Confirm process in place</b> to maintain above records for 3 years.</p>	 HR/Compliance/ Talent Acquisition	60- <a href="#">741.44(k)</a> and 60- <a href="#">741.80(b)</a>	<a href="#">60-300.44(k)</a> and 60- <a href="#">300.80(b)</a>
<b>Additional Recordkeeping Requirements</b>			
<p><input type="checkbox"/> <b>Confirm all other records (electronic or paper) concerning personnel or employment decisions are retained</b> for at least two years. Note: obligation is one year for organizations with less than 150 employees or a government contract of less than \$150,000 (less than \$200,000 for VEVRAA coverage).</p> <p><input type="checkbox"/> <b>Confirm records being used for a complaint investigation, compliance evaluation, or enforcement action can be kept</b> until the final decision is obtained.</p>	 HR/Compliance/ Talent Acquisition	60- <a href="#">741.80(a)</a>	<a href="#">60-300.80(a)</a>

Self-Identification of Protected Status			
<input type="checkbox"/> <b>Solicit</b> protected veteran status. <i>Required to solicit this voluntary information from applicants (at both pre- and post-offer) and employees.</i>	 Talent Acquisition		<a href="#">60-300.42</a>
<input type="checkbox"/> <b>Solicit</b> disability status using OFCCP-mandated language in <a href="#">OFCCP’s Form CC-305</a> , without modification. <i>Required to solicit this voluntary information from applicants (at both pre- and post-offer) and employees.</i> <i>Electronically fillable versions permitted.</i> <input type="checkbox"/> <b>Solicit</b> employee disability status at least every 5 years. <input type="checkbox"/> <b>Send reminder</b> that employees may update disability status at any time, at least once between official 5-year solicitations for disability.	 HR/Compliance	<a href="#">60-741.42</a>	
<input type="checkbox"/> <b>Confirm self-ID responses</b> are kept confidential and separate from actual application. <input type="checkbox"/> For analysis purposes, ensuring <b>demographic details and employment records are connected through a unique identifier (i.e., applicant ID)</b> . <input type="checkbox"/> <b>Confirm disability related self-ID data</b> are stored in a confidential “data analysis file.”	 Talent Acquisition	<a href="#">60-741.42(e)</a> and <a href="#">60-741.23(d)</a>	<a href="#">60-300.42(e)</a>
Affirmative Action Programs and Compensation Reports – Post Completion			
Completion of Affirmative Action Program Steps			
<input type="checkbox"/> <b>Complete technically compliant</b> affirmative action program reports for Section 503 and VEVRAA (where applicable) and hold review/close-out meeting. <i>Contractors may review and customize written narratives with additional information. Do not remove any sections provided by DCI, as they are all required.</i>	 DCI + HR/Compliance	<a href="#">60-741 Subpart C</a>	<a href="#">60-300 Subpart C</a>
<input type="checkbox"/> <b>Availability of Affirmative Action Program:</b> the full affirmative action program, absent data metrics required by § 60-300.44(k) and §60-741.44(k), shall be available to any employee or applicant for employment for inspection upon request. Location and hours during which the program may be obtained shall be posted at each establishment. This can be posted electronically for remote employees, in addition to the physical posting.  <i>DCI narratives include language in the EEO policy statement (also required to be physically posted) with location and hours to meet this requirement.</i>	 HR/Compliance	<a href="#">60-741.41</a>	<a href="#">60-300.41</a>
Responsibility for Implementation			

<p><input type="checkbox"/> <b>Assign an official the responsibility and accountability</b> for implementation of non-discrimination and affirmative action program activities. Officials shall appear on all internal and external communications related to the program and shall be provided with the necessary senior management support and staff to effectively manage its implementation.</p> <p><i>DCI narratives summarize this information</i></p>	 HR/Compliance	<a href="#">60-741.44(i)</a>	<a href="#">60-300.44(i)</a>
<b>Action-Oriented Programs</b>			
<p><input type="checkbox"/> <b>Develop and execute action-oriented programs</b> to correct any identified problem areas.</p> <p>May include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts from among those listed in <a href="#">§ 60-741.44 (f)(1)</a> and <a href="#">(f)(2)</a>, and/or other actions designed to correct the identified problem areas and attain the established goal.</p> <p><i>Note that action-oriented programs are not mentioned under VEVRAA specifically, but regulations require contractors to address “deficiencies” of the program. Recommend including veterans (e.g., evaluating response rate of protected veteran hires to ensure current process is effective or if improvements are needed).</i></p>	 HR/Compliance/ Talent Acquisition	<a href="#">60-741.45(f)</a>	
<b>Good Faith Efforts, Outreach, and Evaluation</b>			
<p><input type="checkbox"/> <b>Implement outreach and recruitment efforts</b> for <b>protected veterans</b> and <b>individuals with disabilities</b>.</p> <p><i>Examples for <a href="#">protected veterans</a> and <a href="#">individuals with disabilities</a></i></p>	 Talent Acquisition	<a href="#">60-741.44(f)</a>	<a href="#">60-300.44(f)</a>
<p><input type="checkbox"/> <b>Confirm annual evaluation/assessment</b> of each outreach and recruitment activity for protected veterans and individuals with disabilities was <b>documented</b>; maintain for 3 years. If concluded that totality of efforts was not effective, identify and implement alternative efforts.</p> <p><input type="checkbox"/> <b>Criteria used for evaluation must include</b> data collected per 60-300/741.44(k) and must include conclusion about effectiveness.</p>	 Talent Acquisition	<a href="#">60-741.44(f)(3)</a>	<a href="#">60-300.44(f)(3)</a>
<b>Audit and Reporting System</b>			
<p><input type="checkbox"/> <b>Measure effectiveness of program</b> and compliance with EEO obligations, indicate need for remedial action, and determine degree to which objectives have been obtained, whether known protected veterans and individuals with disabilities have received opportunities to participate in company-sponsored training and activities.</p> <p><input type="checkbox"/> <b>Confirm documentation of actions taken</b> to comply with audit and reporting requirements and retain. Where deficiencies are found, undertake necessary action to bring the program into compliance.</p> <p><i>Maintain all records for two years</i></p>	 HR/Compliance	<a href="#">60-741.44(h)</a>	<a href="#">60-300.44(h)</a>

<input type="checkbox"/> <b>Deliver training to all personnel involved</b> in recruitment, screening, selection, promotion, disciplinary, and related processes to ensure commitments to non-discrimination are implemented.	 HR/Compliance	<a href="#">60-741.44(j)</a>	<a href="#">60-300.44(j)</a>
<b>Review of Personnel Processes and Physical/Mental Qualifications</b>			
<input type="checkbox"/> <b>Confirm periodic assessment of existing personnel processes</b> to determine if they screen out qualified individuals with disabilities or protected veterans (e.g., recruiting, application, promotion and training) (ensure description of review is documented).  <i>Immediate review necessary; requires ongoing review and obligation to modify, if needed.</i>	 HR/Compliance	<a href="#">60-741.44(b)</a>	<a href="#">60-300.44(b)</a>
<input type="checkbox"/> <b>Confirm periodic review of all physical and mental job qualifications</b> to ensure any qualifications that eliminate applicants are job-related and consistent with business necessity.  <i>Document date(s) when assessment(s) occurred; any actions taken as a result, and date(s) when next assessment will occur.</i>  <i>E.g., Choose X job titles per year for review/documentation of job descriptions before they are posted, and review requirements for jobs that have changed.</i>	 HR/Compliance	<a href="#">60-741.44(c)</a>	<a href="#">60-300.44(c)</a>
<b>Required Annual Reporting</b>			
<input type="checkbox"/> <b>Annual Completion of EEO-1 Report as part of <a href="#">29 CFR 1602.7 - EEO-1 Component 1 Data Collection</a></b> (deadline varies). <input type="checkbox"/> <b>Annual Completion of VETS-4212 Report - <a href="#">Vets-4212 Federal Contractor Reporting</a></b> (file annually between August 1 <sup>st</sup> and September 30 <sup>th</sup> ).	 DCI + HR/Compliance		<a href="#">Part 61-300</a>
<input type="checkbox"/> <b>Annual Certification of Compliance in <a href="#">OFCCP Contractor Portal</a></b> (deadline varies).  <i>Note: As of the date of this checklist, this is not a current requirement but may be revisited in 2026.</i>	 HR/Compliance		