

Understanding Your Support Data

Support Data

The Support Data document comprises portions of the itemized listings in the OFCCP's Compliance Review, FAAP Review, and CMCE scheduling letters. No part of the Support Data is intended or required to be shared with anyone except management responsible for implementing the AAP, and OFCCP Compliance Officers in the event of an audit. Some of the reports in this document require more explanation than others and have links to documents that are more thorough. The items in this document do not describe every item that would be required in an audit; it is recommended that you consult Yocom & McKee's <u>Preparing for an OFCCP Audit</u> document if you are on the CSAL or have received a scheduling letter. These are the components of the Support Data document:

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Support Data - Women & Minorities Cover Page - this page helps to mark the support data pertaining to the Women & Minorities AAP.

Evaluation of Personnel Activity - this section states that your company performs the required analysis of personnel activity, the results of which are the Disparity Analyses. The language in this section is required by regulation, and you should not remove any numbered items.

Disparity Analysis - Applicants and Hires - this report is described in a document you may reach by clicking <u>here</u>. You should not edit or change any part of this report.

Disparity Analysis - Promotions From/Within - this report is described in the same document as the Applicant and Hires Disparity Analysis. You should not edit or change any part of this report. If audited, be prepared to submit documentation that includes established policies and describes practices related to promotions.

Disparity Analysis - Terminations - this report is described in the same document as the Applicant and Hires Disparity Analysis. You should not edit or change any part of this report.

Goals Progress Description - this section states that your company performs the required determination of progress toward the prior year's placement goals, the results of which are in the Goals Progress Report. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney.

Goals Progress Report - this report is described in a document you may reach by clicking <u>here</u>. You should not edit or change any part of this report.

Goals Progress Graph - this graph illustrates the results of the Goals Progress Report, and should not be altered in any way.

Evaluation of Compensation Systems - this section states that your company performs the required evaluation of compensation systems. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney. It is important to note that the August 24, 2023 Scheduling Letter requires additional information regarding compensation, including, among other things, an explanation of factors used to determine compensation (item 19), when the compensation analysis was conducted, total employees analyzed (item 22), etc. See Yocom & McKee's <u>Preparing for an OFCCP Audit</u> document for more details.

Employee Level Compensation Data - this report is described in a document you may reach by clicking <u>here</u>. You should not edit or change any part of this report. It is important to note that this should not be presented as nor considered to be a formal compensation analysis. This report was developed specifically to comply with the Scheduling Letter mentioned in the item above. Your company must evaluate its compensation systems, but there is no prescribed method. The most simple method by far is a cohort analysis. Please contact Yocom & McKee if you wish to know more about running a Cohort Report.

Supplemental Reporting Lists – the lists following this page are not required by regulations, directives, or scheduling letters. They are merely placed for cross-referencing as you review your reports.

Department List - this list acts as a supplement to the Organizational Display that is required by OFCCP regulations.

Job Group List - this list acts as a supplement to the Job Group Analysis that is required by OFCCP regulations.



Job List - this list acts as a supplement to the Availability Analysis that is required by OFCCP regulations.

Support Data - Individuals with Disabilities Cover Page - this page helps to mark the support data pertaining to the AAP for Individuals with Disabilities.

Review of Personnel Processes - this section is required by regulation, and you should not remove any numbered items. Read through the section and ensure that your company performs the review and evaluation of personnel processes. You may add to the list if you have other methods of reviewing the processes, but you should not change any text unless under the guidance of your company's attorney.

Physical and Mental Qualifications - this section states that your company reviews all physical and mental job qualification requirements. Ensure that your company performs the stated review. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney.

Reasonable Accommodation - this section states that your company makes reasonable accommodations to the physical and mental limitations of disabled employees or applicants. Ensure that your company tracks all requests for accommodation, and carefully notes the outcome of such requests. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney. Be prepared to submit reasonable accommodation policies, requests, and outcomes during an audit.

Data Collection Analysis Description - this section states that your company performs the required analysis of applicants, promotions, and hires, the results of which are in the Data Collection Analysis. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney.

Data Collection Analysis of Individuals with Disabilities - this report is described in a document you may reach by clicking <u>here</u>. You should not edit or change any part of this report.

Support Data - Protected Veterans Cover Page - this page helps to mark the support data pertaining to the AAP for Protected Veterans.

Review of Personnel Processes - this section is required by regulation, and you should not remove any numbered items. Read through the section and ensure that your company performs the review and evaluation of personnel processes. You may add to the list if you have other methods of reviewing the processes, but you should not change any text unless under the guidance of your company's attorney.

Physical and Mental Qualifications - this section states that your company reviews all physical and mental job qualification requirements. Ensure that your company performs the stated review. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney.

Reasonable Accommodation - this section states that your company makes reasonable accommodations to the physical and mental limitations of disabled veteran employees or applicants. Ensure that your company tracks all requests for accommodation, and carefully notes the outcome of such requests. The language in this section is required by regulation, and you should change no part of it except under the guidance of your company's attorney. Be prepared to submit reasonable accommodation policies, requests, and outcomes during an audit.

Data Collection Analysis Description - this section states that your company performs the required analysis of applicants, promotions, and hires, the results of which are in the Data Collection Analysis. The language in this



section is required by regulation, and you should change no part of it except under the guidance of your company's attorney.

Data Collection Analysis of Protected Veterans - this report is described in a document you may reach by clicking <u>here</u>. You should not edit or change any part of this report.