

Subject: New Recruitment Guidelines

The Office of Federal Contract Compliance Programs (OFCCP) recently released new regulations that affect most employment vacancies on campus, including SPA and EPA jobs as well as temporary positions. The regulations deal with job recruitments and searches (positions that are posted in any fashion and for which applicants are considered), applicants, and recordkeeping requirements.

The new regulations apply to any vacancy for which an applicant is identified or applies through electronic technology. It includes scenarios where the hiring department –

- Searches for, or peruses, applicants using on-line applicant databases (ex: CareerBuilder, Monster, campus career centers, etc.), or
- Accepts applications from applicants through electronic technology (fax, e-mail, or Internet), or
- Accepts other application materials by electronic means.

Vacancies (EPA .75 and above, SPA, and UTS temporary) that are currently filled through Human Resources and the Office for Equal Opportunity and Equity are already in compliance.

For job recruitments and searches not conducted through HR, OEO, or UTS, hiring departments must review the information below and modify their internal recruitment and selection procedures to assure compliance. *This includes temporary positions recruited and filled directly by your department.*

Attached to this notification you will find a temporary employment application and an applicant tracking form that should be used to assist in your compliance effort.

Vacancy Posting Requirements –

- Each vacancy posting must be given a number for candidates to reference in applying for the position. This number will be a variation of the EPV number currently used in EPA searches. The format to use is:
 - T + College/Division # + Department # + 2-digit year + 2-digit sequence #.
 - Example: T08220601 - This would be the first vacancy filled in 2006 for College (08) and Department (22).
- A description of the basic qualifications/duties must be documented and included in the posting (print ad, electronic posting, etc.). Preferred qualifications need to be listed separately.
- Applicants must be told how to apply. Each posting must expressly state that only persons submitting an application using the method listed will be considered for employment.

Application Disposition Requirements –

- The Temporary Applicant Tracking Form is used to track the disposition status for each applicant.
- The acceptable disposition statuses are listed at the bottom of the form.

Equal Opportunity / Affirmative Action Requirements –

- You must invite applicants to submit race/gender/birth date information; however, it is not mandatory for the applicant to provide the information. The temporary application has an EEO/AA page for the applicant to provide this information.

- The EEO/AA information provided by the applicants must be kept apart from the employment applications and not shared with hiring officials or anyone involved in the selection process. For this reason, hiring officials should designate an individual to collect applications, detach EEO/AA data, and submit required documentation to the Office for Equal Opportunity and Equity at the conclusion of the search process.
- Adverse impact analyses must be conducted to determine if the selection practices had a negative impact on a protected group. Your department must provide the Office for Equal Opportunity and Equity with copies of the EEO/AA page from the employment applications for each applicant who met the basic qualifications including those who chose not to provide their EEO/AA information. Include a cover sheet with vacancy title, vacancy #, hiring official, department, contact information, new hire candidate's name, and new hire candidate's race/gender/birth date info.

Recordkeeping Requirements –

- Job posting (any posting of position to recruit applicants) and applicant records (basic qualifications for position, applications, resumes, applicant disposition tracking form, interview notes, and EEO/AA information for each candidate) must be kept for two years.
- After the two-year archival period, records must be destroyed in a confidential manner.

Database Requirements – applies to internal (i.e. Access, Excel, etc.) and external candidate databases

If a hiring department uses internal or external electronic databases to store applications, resumes, vitas, etc. for future consideration and/or searches external databases like Monster, CareerBuilder, YahooHotJobs, etc. to identify potential candidates, the following records must also be maintained for two years:

- Search criteria
- Date of search
- Results of search (candidates who met basic qualifications)
- Resumes added to the internal database and date added

Compliance –

- Campus departments must begin efforts now to ensure compliance.
- Human Resources (Employment) staff are available to review your current practices and recommend changes, if needed.
- Human Resources (Employment) will conduct random departmental audits on a quarterly basis.
- Audit results will be shared with college/departmental management and OEO.

In lieu of ensuring compliance in your department, you may choose to contact University Temporary Service to obtain temporary employees. UTS will then be responsible for compliance with the above requirements.

If you have questions, please contact Rick Williams (513-4424), Amy Grubbs (515-4278), or Kathy Lambert (515-4277) prior to taking any action. In addition, if you have questions concerning the applicant tracking information or the adverse impact analysis, please contact Kisha Simmons at 513-3250. You may also visit the US Department of Labor's website at <http://www.dol.gov/esa/ofccp/> for additional information.

Thank you for your assistance with this compliance effort.