



## Ten Steps to Internet Applicant Compliance

1. Gather race/ethnicity and gender data on applicants to meet *all four* of the *OFCCP Internet Applicant criteria*:
  - a. Individual submits a solicited or unsolicited expression of interest in a current opening or future position, via *any* electronic media.
  - b. Individual is considered for a particular position, including the simplest review of any expression of interest in any format.
  - c. Individual has the basic qualifications for the position (*non-comparative, objective, relevant to the position, and applied uniformly and consistently*), as advertised in a job announcement or established in writing before applicant consideration begins.
  - d. Individual remains interested until a hiring offer is made (*does not expressly withdraw from consideration or does not passively show disinterest by refusing interviews, ignoring inquiries, or by showing disinterest in salary level, type of work, or work location*).
2. Apply an “Any = All” test: If you receive even one (*any*) expression of interest via *any* electronic media for a particular hiring action, then *all* applicants in that hiring action must be treated like an Internet Applicant.
3. Define protocols (*only solicited applications*) and data management techniques (*first 50 applications received*) to reduce the numbers of considered applicants; use consistently and non-comparatively.
4. Ask applicants to self-identify race/ethnicity (*by EEO-1 Report’s seven categories*) and gender information as early as possible in the hiring process - preferably at the application stage.
5. Collect and track applicant race/ethnicity and gender data by job title and hiring requisition number with an electronic Applicant Tracking System (ATS) to analyze data and *document your efforts* to avoid, detect or correct unintentional adverse impact against protected groups.
6. Keep all records “made or kept” during hiring actions for two years following the *completion* of hiring actions.
7. Preserve written Affirmative Action (AA) Plans and documentation of good faith efforts for the current year and the immediately preceding year.
8. Document all database searches on search engines such as *Monster.com, CareerBuilder.com, etc.*, with date, time, search criteria, and name of the recruiter conducting the search.
9. Treat all employment records and AA documentation as *Privileged and Confidential* information.
10. Reasonable accommodation for qualified Internet Applicants with disabilities or disabled veterans should be designed into *all electronic or web-based systems*.

*example:* all kiosks should be accessible to the disabled, and a contact person should be listed on the front page of your applicant website for individuals who need alternate accommodations to apply.

### Compliance Simplified?

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