

OFCCP Announces CSAL List Coming in March 2019

Government Contractor Compliance & Regulatory Update on **February 25, 2019**

OFCCP has [announced](#) that its next Corporate Scheduling Announcement Lists (CSALs) are expected to be published on its [FOIA Library](#) in “mid-to-late March 2019.” As we have previously [reported](#), OFCCP will not mail out CSALs to contractors but will instead publish the lists on its website.

OFCCP also shared that the lists will include [Section 503 Focused Reviews](#) and [Affirmative Action Program Compliance Checks](#). OFCCP additionally promised to provide more Section 503 contractor compliance resources on its website in anticipation of the upcoming focused reviews.

Key Takeaways: The OFCCP’s short announcement provides a few interesting kernels of information for contractors.

First, because CSALs typically are issued in February, OFCCP’s announcement provides contractors some comfort as to when to expect the CSALs to issue. In addition, OFCCP will issue an announcement once the list is posted so contractors can stop constantly checking the OFCCP’s website. We will receive that announcement and will promptly report when the lists are issued on our blog.

Second, the announcement notes that Section 503 focused reviews will be part of this fiscal year’s compliance evaluations. Given that the announcement does not reference VEVRAA or Executive Order 11246 focused reviews, it appears that such focused reviews will not be commenced in the near future.

Finally, the announcement curiously notes that the list will include “compliance checks as outlined in our Affirmative Action Program Verification Initiative Directive.” The AAP Verification Initiative Directive (the “Directive”) mentions compliance checks as a component of the verification initiative that is to be created by OFCCP, but those checks are supposed to confirm the veracity of a contractor’s certification that it has complied with its AAP obligations. As the Directive states: “This [AAP compliance] verification would initially take the form of OFCCP review of a certification, followed by potential compliance checks...” The agency has not provided any information about actual implementation of a certification program, or a compliance check follow up procedure. As such, the reference to “compliance checks” in the recent CSAL announcement is noteworthy. As we learn more details about the compliance checks, we will publish them here.

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