

# OFCCP Provides Anticipated Guidance On Section 503 Focused Reviews

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**Quick Hit:** As we previously [reported](#), OFCCP is about to introduce “focused reviews” – compliance evaluations focused on a particular area of OFCCP enforcement – and its upcoming publication of the 2019 CSAL list will include Section 503 Focused Reviews. In advance of the launch of focused reviews, OFCCP has established a Section 503 Focused Reviews [webpage](#) (“Section 503 webpage”). The Section 503 webpage provides contractors with resources aimed at assisting with Section 503 focused reviews, including: a Section 503 [FAQ page](#), a copy of the Section 503 Focused Review Scheduling [Letter](#), and “OFCCP compiled disability related [best practices](#) to assist federal contractors with compliance.”

**Key Takeaway:**

Contractors should familiarize themselves with the contents of Section 503 webpage, which provides some useful guidance. Of particular note, the FAQ page provides helpful answers for some common questions about the focused reviews as well as new insights. For example:

- Although the Section 503 Focused Review Scheduling Letter requests a copy of the contractor’s EO 11246 Affirmative Action Program, the document is not reviewed as part of the focused review; rather, it will be used to help the compliance officer understand the contractor’s organizational structure and compliance efforts.
- Contractors will not be scheduled for full compliance evaluations while undergoing a Section 503 Focused Review (but will not be immune from investigations into individual complaints alleging violations of the laws OFCCP administers);
- For now, Section 503 Focused reviews will be conducted only at contractors’ corporate headquarters locations.

OFCCP provides other resources as well, including links to its best practices with regard to recruiting, hiring, and retaining disabled individuals, which should help contractors anticipate the practices that OFCCP will be looking for during a focused review.

**More Detail:** On March 8, 2018 OFCCP published its Section 503 webpage. OFCCP intends the Section 503 webpage “to provide contractors with helpful information and assistance in implementing best practices and increasing the employment of individuals with disabilities[.]” and to “serve as a resource center for contractors.” The Section 503 Webpage can be accessed [here](#).

The Section 503 webpage provides a number of resources, including:

- [Directive 2018-04](#) (which establishes focused reviews);
- A [sample](#) Section 503 Focused Review Scheduling Letter so contractors can know what OFCCP will request if they are selected for such a review;
- Section 503 Focused Reviews [Frequently Asked Questions](#) where OFCCP has posted 12 questions and answers about Section 503 Focused Reviews;
- Section 503 regulations
- OFCCP’s “Best Practices” for Section 503 compliance;
- Section 503 resources “providing help, assistance, guidance, support and advice”; and
- The voluntary self-identification form for individuals with disabilities.

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