

Equal Employment Opportunity (EEO) Self-Audit Checklist

The following checklist is intended as a general guideline for monitoring your employment policies and practices in an effort to minimize the company's exposure to violations of federal anti-discrimination laws or claims of discrimination by employees or applicants. State or local laws may impose additional requirements on employers. This checklist is not intended to be legal advice. If legal advice or other expert opinion is required, you should consult with legal counsel regarding specific facts and circumstances.

	YES	NO
1. Have employee selection procedures been reviewed to ensure that women, minorities, and older workers are not adversely affected by non job-related selection criteria or procedures, for example, tests, interview questions, etc.?	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the company use a job posting procedure to ensure nondiscriminatory access to promotions and transfers?	<input type="checkbox"/>	<input type="checkbox"/>
3. Have interviewers been trained to avoid unlawful inquiries and to use formal checklists of relevant subject areas?	<input type="checkbox"/>	<input type="checkbox"/>
4. If subcontractors or recruiting agencies are used, do contracts prohibit discrimination and avoid joint employer status?	<input type="checkbox"/>	<input type="checkbox"/>
5. If credit reference reports or other investigative services are used, are state and federal Fair Credit Reporting laws followed?	<input type="checkbox"/>	<input type="checkbox"/>
6. If written or performance tests are used to select applicants for employment or employees for promotion, does the company monitor the results of these tests and consider whether minorities or women have been adversely affected? Has the test been validated to establish job-relatedness?	<input type="checkbox"/>	<input type="checkbox"/>
7. If you require post-offer physicals, do you pay the cost of the examination and is the examination used solely to ensure that the applicant is physically, mentally, and/or medically able to perform the essential functions of the job applied for with or without a reasonable accommodation?	<input type="checkbox"/>	<input type="checkbox"/>
NOTE: To comply with the Americans with Disabilities Act, any physical must be given after an offer of employment has been extended.		
8. Are reasonable accommodations made for applicants' and employees' religious practices or disabilities, to ensure consistent treatment with respect to job application procedures, hiring, advancement, or discharge of employees, employee compensation, job training, and other terms, conditions, and privileges of employment in accordance with Title VII of the Civil Rights Act and the Americans with Disabilities Act?	<input type="checkbox"/>	<input type="checkbox"/>
9. Are new employees informed of the following: a) benefits eligibility; b) procedures for seeking resolution of work-related problems, including harassment and discrimination complaints; c) the company is an equal employment opportunity employer; and d) the employment relationship is employment-at-will, to the extent permitted by state law?	<input type="checkbox"/>	<input type="checkbox"/>
10. To avoid violations of the Equal Pay Act, are wage differentials based upon non sex-related factors, for example, productivity, quality of performance, seniority, etc.? Are wages paid according to the salary administration plan? Are wage increases determined based on objective job-related factors and monitored to ensure non discrimination?	<input type="checkbox"/>	<input type="checkbox"/>

		YES	NO
11.	Do the company's group health insurance policies provide coverage equally for all illnesses and disabilities without regard to sex or pregnancy? Do they also provide for equal coverage for the employees' spouses?	<input type="checkbox"/>	<input type="checkbox"/>
12.	Are dress and grooming standards consistently and reasonably enforced? Does the company reasonably accommodate employees' religious and ethnic dress and grooming practices?	<input type="checkbox"/>	<input type="checkbox"/>
13.	If bonuses are paid, are eligibility requirements and the amount of the bonus based on non discriminatory factors? Does the company monitor the effect of its bonus program to ensure that it is administered without regard to race, sex, color, religion, national origin, age, disability, or any other protected class at the federal, state, or local level?	<input type="checkbox"/>	<input type="checkbox"/>
14.	Since administration of leave of absence policies may result in unintended discrimination, does the company: a) post or publish a policy as necessary to be in compliance with applicable federal (for example, Federal Family and Medical Leave Act) and state laws, and b) record each employee who requests a leave; the reason for the leave; and the disposition thereof, for example, granted or denied, and following leave, resigned, reinstated, or replaced?	<input type="checkbox"/>	<input type="checkbox"/>
15.	If the company maintains a pension or retirement plan: a) does the plan comply with the requirements of the Employee Retirement Income Security Act (ERISA), and b) is it consistently administered without regard to race, sex, color, religion, national origin, age, disability, or any other protected class at the federal, state, or local level?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Are supervisors evaluated, in part, upon their efforts and success in managing and complying with federal and state equal employment and affirmative action laws?	<input type="checkbox"/>	<input type="checkbox"/>
17.	Are supervisors evaluated, in part, on their ability to document violations of work rules and any personnel actions taken against employees?	<input type="checkbox"/>	<input type="checkbox"/>
18.	Do the employee handbook, personnel policy manual, and other procedural manuals contain a statement of the company's equal employment opportunity policy?	<input type="checkbox"/>	<input type="checkbox"/>
19.	Have the company's operating procedures and policies been reviewed to eliminate discrimination on the basis of sex or pregnancy, for example, in leaves of absence, benefits, and retirement benefits?	<input type="checkbox"/>	<input type="checkbox"/>
20.	Were adequate and documented warnings given to employees discharged for poor performance, excessive absenteeism, or other violations of the company's work rules or personnel policies?	<input type="checkbox"/>	<input type="checkbox"/>
21.	Prior to terminating employees, are managers and supervisors required to follow consistent procedures to ensure there has been an investigation of the alleged violation of the company's work rules, and discharge decisions are supported by thorough documentation?	<input type="checkbox"/>	<input type="checkbox"/>
22.	Are exit interviews conducted to ensure that discharged employees were not victims of unlawful discrimination or sexual harassment?	<input type="checkbox"/>	<input type="checkbox"/>

		YES	NO
23.	If applicable, is the EEO-1 statistical information form filed with the Equal Employment Opportunity Commission annually by September 30? EEO-1 filing requirements apply to private employers with 100 or more employees and federal contractors with 50 or more employees and \$50,000 in contracts or subcontracts. Refer to section 1 for more information on EEO-1 filing requirements.	<input type="checkbox"/>	<input type="checkbox"/>
24.	If applicable, does a review of the company's five most recent EEO-1 forms indicate that the representation of women and minorities in each EEO-1 category is increasing or decreasing?	<input type="checkbox"/>	<input type="checkbox"/>
25.	Are personnel records retained for at least the minimum periods required by federal and state statutes?	<input type="checkbox"/>	<input type="checkbox"/>
26.	In the event of an investigation by an EEO compliance agency, have supervisors been trained to: a) not disclose information to the investigator without advice of counsel or the administrator; b) obtain a statement of the investigator's purpose and identity; c) immediately report the agency contact to the appropriate company official; and d) assist the company in defending itself during the compliance audit or investigation?	<input type="checkbox"/>	<input type="checkbox"/>

Note: Employers with federal contracts or subcontracts may have specific requirements under certain laws such as Executive Order 11246, the Vietnam Era Veterans Readjustment Assistance Act, or the Vocational Rehabilitation Act. Contact the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) for more information.