CONTRACTOR COMPLIANCE CHECKLIST
FOR
CONTRACTORS ON FEDERAL-AID CONSTRUCTION PROJECTS
CONTRACT REQUIREMENTS - SPECIFIC EEO RESPONSIBILITIES

___1. GENERAL (be aware of authority for provisions, the need to cooperate with state and federal government, and scope of coverage)

___2. EEO POLICY (develop company EEO policy statement and have a positive continuing program)

___3. EEO OFFICER (appoint EEO Officer and notify DOTD of appointment) the officer should be someone with the knowledge/expertise in Equal Employment Opportunity and typically is not the owner(s) of the firm.

___4. DISSEMINATION OF POLICY (internally and externally)
   ___meet with key personnel before project begins and then no less often than every 6 months
   ___orient new supervisor as to contractor’s EEO obligations within 30 days
   ___meet periodically with all employees, provide copy of EEO policy, etc.
   ___post policy at home office and project site/ include notices covering employee referrals, training program information, and identification of EEO Officer and contact information

___5. RECRUITMENT (exert good faith efforts to achieve and maintain acceptable representation of minorities and females when vacancies occur in the work force)

   ___include “An Equal Opportunity Employer” notation in all ads
   ___conduct systematic and direct recruitment (identify sources of potential minority and female employees, establish referral procedures, and contact sources)
   ___encourage present employees to refer minority and female applicants through posting notices and discussion with employees

___6. PERSONNEL ACTIONS (must ensure nondiscrimination in wages, working conditions, employee benefits, hiring, upgrading, promotion, transfer, demotion, layoff, and termination)

   ___periodically review selected personnel actions and spread of wages
   ___conduct project site inspections
   ___ensure EEO policy, EEO poster and other required notices are posted
   ___investigate complaints of alleged discrimination

___7. TRAINING AND PROMOTION (if the project and work force can support these actions)

   ___fulfill Training Special Provisions if opt to train under the contract
__provide formal and informal training when appropriate__
__advise employees and applicants of available training programs__
__periodically review the training and promotion potential of minority and female employees and encourage eligible employees to apply__

___8. UNIONS (use best efforts to obtain the cooperation of unions to increase opportunities and to effect referrals of minority group and female employees)___

__cannot rely on unions as sole referral source as they are only given first opportunity to fill requests for referrals__
__conduct independent recruitment if unions are unable to provide a reasonable flow of minority and female referrals within the collective bargaining agreement time limit__

___ 9. SUBCONTRACTING (use best efforts to solicit bids from and utilize minority group and female subcontractors with meaningful minority group and female representation)___

__comply with DBE requirements if contract has a DBE goal__
__ensure subcontractor compliance with EEO obligations__
__include all EEO provisions of prime contract in all subcontracts of $10,000 or more in value__
__Include Required Contract Provisions (FHWA-1273) to material suppliers of $10,000 or more in value and make binding on agreement__

___10. RECORDS AND REPORTS (as required to document actions and determine compliance)___

__must maintain records for at least 3 years following completion of work or longer if necessary__
__must submit Annual EEO Report (Form FHWA-1391), when applicable, by the second Friday in August of each year according to instructions provided by Project Engineers__

The above checklist is provided as a guideline for contractors in complying with EEO contract provisions. For assistance please contact:

Juanita Linton - Contract Compliance Program Manager
Compliance Programs Section - DOTD Headquarters/305 I
Telephone: (225) 379-1361
Fax: (225) 379-1865
Email: juanita.linton@la.gov