



OFCCP Releases Latest Audit Scheduling List: Federal Contractors Should Execute This 6-Step Plan if You've Been Selected

Insights

11.21.24

The Office of Federal Contract Compliance Programs (OFCCP) just released its 2025 Corporate Scheduling Announcement List (CSAL), which identified about 2,000 establishments of supply and service contractors that have been selected for an upcoming audit. Federal contractors and subcontractors should immediately examine the list to determine if one or more of your establishments have been identified for such an audit. This Insight explains how to find out if you've been selected, summarizes the scheduling methodology in more detail so you can learn why you were chosen, and provides a six-step plan for responding.

How Can We Find Out If We've Been Selected for Audit?

You should immediately review the [2025 Corporate Scheduling Announcement List \(CSAL\)](#) by [clicking on this link](#) and choosing "FY 2025 CSAL Supply & Service Scheduling List." Doing so will generate an Excel document as a downloadable file, which contains the actual list.

What Should Contractors on the FY2025 List Do?

Contractors who are on the 2025 CSAL list should consider following this six-point plan:

1. Ensure that your affirmative action programs and other regulatorily required documents and postings are prepared for a compliance review.
2. Notify your EEO coordinators, as well as your top U.S. ranking officials, to be on the lookout for a [Scheduling Letter and Itemized Listing](#) from OFCCP. The letters may arrive via U.S. mail or via email.
3. If you have more than one establishment selected for audit, you should anticipate that your audits may occur simultaneously and will likely be handled by the same regional office, regardless of the geographic location of the establishments selected for audit. Prepare accordingly. Similarly, if the selected location is on a campus or in a "campus-like" setting, OFCCP will likely audit all establishments on that campus.
4. Understand that receiving the Scheduling Letter begins the timeline for the compliance reviews. Once the Scheduling Letter is received, you will have the standard 30 days to submit the items listed in the Scheduling Letter. This includes your affirmative action plans as well as items that

may be requested in an Itemized Listing, including documentation of your outreach efforts, compensation information, and more.

5. Be mindful that the OFCCP may send audit notices at any point now that the list has been released.
6. Finally, and most importantly, you should consult with your legal counsel to prepare your audit responses.

What Was the OFCCP's Methodology for Selecting Contractors?

Contractors often ask themselves, "why us?" For this CSAL list, OFCCP published the following scheduling methodology online, explaining that it applied the following criteria in selecting establishments for the CSAL:

- OFCCP accessed the USAspending.gov database and downloaded a list of federal contracts valued at \$50,000 or more. Establishment-based reviews for the list include reviews for financial institutions, universities, and colleges. OFCCP removed contracts awarded to federal, state, local, municipal, tribal, city, and foreign governments, and school districts, OFCCP also removed companies that only engaged in construction contracts with the federal government and healthcare contracts covered by certain OFCCP's rules.
- OFCCP then matched company names and addresses against the 2022 EEO-1 filings to identify establishments with 400 employees in all U.S.-based establishments, with at least 50 employees in the selected establishment, to be included in the pool of federal contractors and prime subcontractors to be considered for audit selection.
- The OFCCP also cross-referenced all eligible establishments and functional units with the agency's compliance management system to remove those that were currently: under review; in a monitoring period pursuant to a conciliation agreement; within the exemption period following a closed review; or pending scheduling for review from a prior scheduling list. It also removed those that have an active separate facilities waiver.
- To finalize reviews, the OFCCP selected the establishments with the highest employee counts in each district office. The OFCCP did not include more than 10 establishments of any parent company. OFCCP selected 10 Corporate Management Compliance Evaluation (CMCE) reviews of contractors that did not have more than 10 establishments per OFCCP region. The agency selected one hospital for review per OFCCP region and two colleges/universities per OFCCP region. Additionally, for Functional Affirmative Action Program (FAAP) reviews, OFCCP selected eight functional units with the highest employee count in each OFCCP region but limited its review to a maximum of four FAAP units of any parent company.
- Establishments that have fewer than 400 employees at the time of scheduling but otherwise meets OFCCP's jurisdictional thresholds are eligible for a compliance review. Notably, regions can balance workloads by transferring cases across their district offices or to other regions.

What Else Do You Need to Know?

The CSAL list also identifies the several types of audits that federal contractors and subcontractors will be subject upon receipt of their official audit notice:

- Full Compliance Review (Establishment Review);
- Corporate Management Compliance Evaluation (CMCE); or
- Functional Affirmative Action Program (FAAP) Review.

You can learn more about each type of review on OFCCP's website or by speaking with your Fisher Phillips attorney.

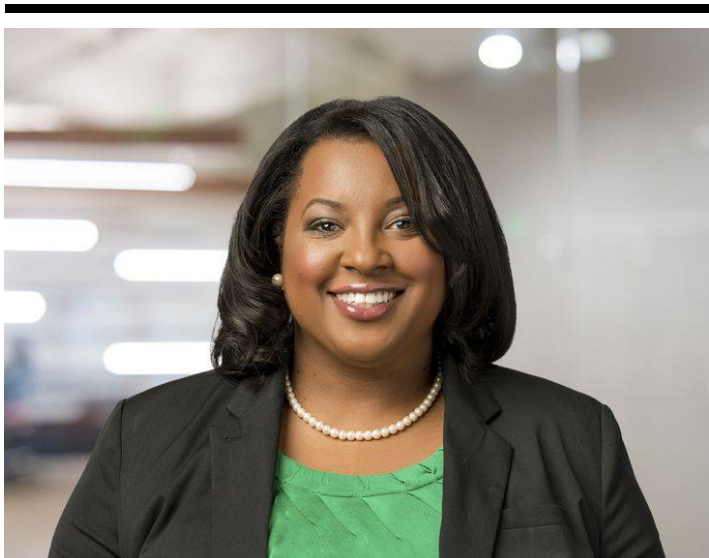
Notably, contractors on prior CSAL lists should not breathe a sigh of relief, OFCCP does not purge unscheduled cases from prior lists, so those contractors can, and likely will, be scheduled for an audit.

Importantly, **federal contractors not identified on the CSAL list may be selected for an audit in certain circumstances.** This could happen through a complaint, contract award notice, or as a result of a conciliation agreement or consent decree progress report monitoring.

Conclusion

Fisher Phillips will continue to monitor any further developments in this area as they occur, so you should ensure you are subscribed to [Fisher Phillips' Insight System](#) to gather the most up-to-date information. If you have any questions about how this development impacts your organization, please consult your Fisher Phillips attorney, the authors of this Insight, or a member of Fisher Phillips' [Affirmative Action and Federal Contract Compliance Practice Group](#).

Related People



Sheila M. Abron

Partner

803.740.7676

Email

Service Focus

Affirmative Action and Federal Contract Compliance