

Frequently Asked Questions
Demonstrating Good Faith Efforts to Comply with the SEC Contract Standard

1) Is there a specific format required for submitting the information on the total number of contractor's employees, and the number of employees by race, ethnicity, gender, and job title or EEO-1 Report job category?

No. The Contract Standard does not prescribe a specific format for submitting this information. However, for companies already required to file an Employer Information Report EEO-1 with the EEOC (generally, employers with 100 or more employees and Government contractors with 50 or more employees and a government contract of \$50,000 or more), the simplest way to provide the information is by submitting a copy of your most recent EEO-1 Report. Companies with multiple establishments can submit the Consolidated EEO-1 Report that includes all employees.

2) Must the contractor provide a list of *all* subcontractors on the SEC contract?

No. The contractor must provide a list of only "covered" subcontractors, which are those awarded a subcontract for **services** with a dollar value of \$100,000 or more under the SEC contract. For each covered subcontract award, the contractor is asked to provide dollar amount, date of award, and the subcontractor's race, ethnicity, and/or gender ownership status.

If there are no covered subcontracts associated with the prime SEC contract, the contractor should state so in its response.

3) Is there a template for the contractor's plan for ensuring the fair inclusion of minorities and women in its workforce, including outreach efforts?

No. The Contract Standard does not prescribe the contents of a plan for ensuring the fair inclusion of minorities and women in a contractor's workforce, nor does it require a contractor to produce a particular document as support. However, contractors already required to develop a written Affirmative Action Program (AAP) by the Department of Labor regulations implementing Executive Order 11246 may simply submit the company's AAP.

Typically, the AAP includes actions taken by the contractor to ensure the fair inclusion of minorities and women in its workforce, including outreach efforts. Examples within the AAP may include placing vacancy announcements on diverse job websites, recruitment at professional conferences focused on minorities and/or women, participating in job fairs at women's colleges and minority-serving institutions, providing training on eliminating bias in recruitment, hiring, personnel actions and other activities, etc. This is a very limited list of examples, and is provided for illustrative purposes only.

4) Must the contractor submit documentation regarding good faith efforts to comply with the Contract Standard for each covered subcontractor listed in the response?

No. The contractor need only submit the documentation specified in paragraphs (a) and (c) in the Document Request Letter for each covered subcontractor **that has 50 or more employees**.