

Office of Federal Contracts Compliance Programs

Methodology for Developing the Scheduling List Supply & Service Federal Contractors FY 2018, Release - 1

The process of developing the first release of the FY 2018 Supply and Service scheduling list started by downloading Federal contract information from archived files of the Federal Procurement Data System–Next Generation (FPDS-NG) for years 2015, 2016 and 2017. The FPDS-NG is a publicly-available information system administered by the U.S. General Services Administration (GSA). The downloaded transactional data were consolidated to create a single record for each contract, containing: the contract number, contractor names, establishment address, contract-related dates, contract-related dollar amounts, contracting agency, the Data Universal Numbering System (DUNS) number, the North American Industry Classification System (NAICS) code, and employee count. Next, OFCCP removed: (1) cancelled contracts, (2) contracts associated with debarred companies, (3) contracts that expired by January 31, 2017, (4) contracts valued at less than \$50,000, and (5) contracts awarded to federal, state, local, municipal, tribal, city, and Foreign governments, school districts, or construction companies. In addition, contracts that did not have any modification in the last fifteen months were assumed closed or cancelled, and were removed. OFCCP considered the remaining records as active contracts within OFCCP’s jurisdiction.

If a contractor had only one contract at a given establishment address, the contract record was called the “Establishment Record.” If a contractor had multiple contracts at the same physical address, the contract record with the farthest expiration date became the Establishment Record and all contract numbers from other contract records were added to it. These establishments were called “Direct Establishments.” Company names and addresses of Direct Establishments were matched against the EEO-1 database, which is administered by the Equal Employment Opportunity Commission (EEOC). For Establishment Records that matched EEO-1 records, OFCCP added the parent name, establishment name, unit number, headquarter number, establishment status, employee count, and contact information from the EEO-1 records to the respective Establishment Records. Establishment records were further consolidated at the parent level to capture all contracts held by each parent company. If a parent had only one establishment with a contract(s), the “Parent Record” was the same as the Establishment Record. If a parent had multiple establishments with contract(s), the Establishment Record that had the farthest contract expiration date became the Parent Record and all contract numbers from all its establishment records were added to it. Consistent with OFCCP’s TRICARE Directive (DIR 2014-01), healthcare establishments that did not have a separate contract establishing OFCCP jurisdiction were not consolidated at the Parent level. Accordingly, no TRICARE subcontractors were included in the scheduling list. This process created a Contract File, an Establishment File, and a Parent File.

For each parent in the Parent File, OFCCP extracted all establishments with 100 or more employees from the EEO-1 database and added them to the Establishment File. These extracted establishments did not have direct contracts but fell within OFCCP’s jurisdiction because their

parent entity had a covered direct contract(s). These additional establishments were called “Associate Establishments.” OFCCP then added contract information from the parent record to the respective Associate Establishment records. Such contract information included: contract numbers, contract dollar values, and contract expiration date. All of these Direct and Associate Establishments became the “Available Pool” for scheduling.

All functional units of companies that had active Functional Affirmative Action Program (FAAP) agreements and all establishments of FAAP contractors that were not part of the FAAP agreements were added to the Available Pool. Contract information relevant to FAAP companies was retrieved from the Parent File and added to the respective FAAP functional units and establishments. Each record in the Available Pool was labelled as: Direct Contract Establishment (D), Associate Contract Establishment (A), Corporate/Division Headquarter (M), FAAP Functional Unit (F) or University (U).

Once the “Available Pool” was complete, OFCCP compared it to the agency’s administrative database (OFIS) removing establishments currently under review, those that completed a review within the last five years, were currently under monitoring pursuant to an ongoing conciliation agreement/consent decree, had a separate facility exemption, had contracts expiring before March 31, 2018, or were available for scheduling from an earlier list. Using EEO-1 data, OFCCP removed Direct Establishments with less than 70 employees. Finally, using Lexis-Nexis Corporate Structure and Duns and Bradstreet Family Tree, OFCCP removed independent subsidiaries of corporations that did not have contract coverage. The remaining establishments in the Available Pool were assigned unique serial numbers for identification and an OFCCP district office code based on the establishment’s physical address. This process created separate pools of available establishments for each district office. Based on OFCCP’s available resources – FTE as of December 2017 – the scheduling list was capped at 1,000 establishments. Each OFCCP district office’s share of the total list was computed based on FTE count.

The Available Pool was ordered by employee count (highest to lowest) within each district office. OFCCP applied the following criteria to select the specific number of establishments that each district office received for scheduling: (1) priority for establishments with higher employee count regardless of Direct or Associate establishment status, (2) no more than 10 establishments of a parent company in the entire scheduling list, (3) no district office to have more than four establishments of the same company, (4) no more than two functional units of each FAAP company, and (5) no district office to have more than two corporate/regional headquarter (CMCE), two FAAP Units and one university for review. Once all establishments for this release were identified, they were randomly ordered, uploaded into the Case Management System and, if necessary, appended to district offices’ lists of unscheduled establishments. OFCCP does not purge unscheduled cases from prior lists before releasing a new scheduling list.

DISCLAIMER: OFCCP’s decision to publish its scheduling methodology is voluntary. OFCCP has no legal obligation to publish its methodology and will revisit the decision to publish its scheduling methodology each time the methodology is revised.