



OFFICE FOR ACCESS AND EQUITY

Recording the Hiring Process

The hiring process involves the creation, use, and retention of documents that facilitate hiring and help ensure the University is in compliance with federal and state employment laws and regulations. Failure to comply may lead to a loss of federal funding, subject the University to monetary fines, and place the University at risk for employment-related litigation. Compliance allows the University to demonstrate its commitment to nondiscrimination in recruitment and hiring, respond to reasonable requests for accommodation in the hiring process, and meet its goal of recruiting, developing, and supporting diverse individuals whose work advances the vision and mission of the University.

Hiring process records retention guidance is based on the Americans with Disabilities Act (ADA) and the Office of Federal Contract Compliance Programs' (OFCCP) enforcement of Section 503 of the Rehabilitation Act of 1973, as amended.

Candidate Records

All candidate records created and used during the hiring process for staff recruitments, including those for the hired individual, must be retained for three years after the end of the recruitment. Records include any record dealing with recruitment and hiring but are not limited to:

- A copy of the job description, including basic and additional qualifications, for each position to which the individual applied
- A copy of job advertisements and job postings for each position to which the individual applied
- All applications, resumes, cover letters, diversity statements, and other expressions of interest that were considered
- Requests for reasonable accommodation of applicants
- Copies of applicant screening questions, phone screen results, interview questions, interview notes, tests, test results, and all other screening and evaluation tools used to select candidates from each applicant pool
- Correspondence, letters of reference, references, and notes from reference checks

Activity disposition codes

The OFCCP monitors federal contractors' compliance in the areas of nondiscrimination in the recruitment and selection process, applicant and employee data, and compensation. As a federal contractor, the University must comply with OFCCP regulations by accurately documenting and recording the search process.

Dispositioning is one of the strongest ways to record the hiring process, demonstrate fair and equitable review of applicants, and should be an ongoing activity during the recruitment process, not simply done at the end. Recording activities you go along during the review, evaluation, and hire of candidates results in being able to tell the story of how an applicant was hired, why an applicant was not hired, and the overall selection and hiring process.

Notetaking

Taking notes and documenting answers to interview questions is the best way to refresh your memory of what happened or was said in an interview and discussions with others who interviewed the same person. They can be used to facilitate the selection process and document your fair review of candidates. Notes should be factual, nondiscriminatory, and related to the applicant's qualifications and skills relative to the position. Strive for consistency of quality and quantity when taking notes and documenting scores and interview results. Keep in mind that interview notes and other screening documentation may be examined after the fact (e.g., during an audit, litigation, or public records request), and each word's meaning may be questioned.

After an interview, notes from an interview team may be consolidated into a single interview summary, which is retained, and then the notes may be disposed.

