

**U.S. Department of Labor**

Office of Federal Contract Compliance Programs  
Southwest and Rocky Mountain Regional Office  
525 South Griffin Street, Suite 840  
Dallas, TX 75202



December 13, 2024

Via Electronic Mail: [info@aflegal.org](mailto:info@aflegal.org)

Will Scolinos  
America First Legal Foundation  
611 Pennsylvania Ave. SE, #231  
Washington, DC 20003

Re: Complaint Number I00314258

Dear Will Scolinos:

This correspondence acknowledges receipt of your organization's complaint, filed against American Airlines, alleging a violation of Executive Order 11246, as amended (EO 11246).

On December 13, 2024, the U.S. Department of Labor, Office of Federal Contract Compliance Programs (OFCCP), held an informal compliance conference with American Airlines in accordance with 41 CFR §60-1.24 (c) (2) to address the allegations made in your complaint filed against American Airlines

This letter confirms the following commitments:

1. American Airlines understands that OFCCP regulations do not permit quotas, preferences, or set asides.
2. American Airlines agrees that placement goals (under Executive Order 11246), utilization goals (under Section 503 of the Rehabilitation Act of 1973, as amended), and hiring benchmarks (under the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. § 4212) are not to be interpreted as a ceiling or floor for the employment of particular groups of persons, but rather should serve as a benchmark against which American Airlines measures the representation of persons within its workforce.
3. If American Airlines fails to meet a utilization goal or hiring benchmark, American Airlines will assess its employment practices and take appropriate measures to address identified problem areas and remedy any unlawful discrimination. Such remedies may include assessing and revising policies and practices that hinder equal employment opportunities, broadening recruitment and outreach to increase the diversity of applicant pools, and/or instituting training and/or apprenticeship programs to increase promotion opportunities and applications from underrepresented groups.

This concludes our processing of this matter.

Sincerely,

*Ronald W. Sullivan, II*

Ronald W. Sullivan, II  
Regional Director