



Understanding Your Individuals with Disabilities AAP

Affirmative Action Program for Individuals with Disabilities

The AAP for Individuals with Disabilities consists of narrative text and several reports required by the Office of Contract Compliance Programs' (OFCCP) regulations. The narrative portion of your affirmative action program (AAP) includes any non-report documents, and describes the structure and policies backing your AAP. This AAP must be available for inspection upon request to any employee or applicant. Post notice on a virtual or real bulletin board that informs applicants and employees of where and between which business hours the AAP is available for viewing. See a sample notice of posting, and other sample documentation in Yocom & McKee's [Implementing Your AAP](#) document.

These are the components of the Individuals with Disabilities AAP:

- ❖ Individuals with Disabilities AAP Cover Page
 - [Contact Information](#)
 - [Equal Employment Opportunity Policy](#)
 - [Harassment](#)
 - [External Dissemination of Policy](#)
 - [Assessment of External Outreach and Recruitment Efforts](#)
 - [Assessment of Outreach and Recruitment Activities](#)
 - [Internal Dissemination of Policy](#)
 - [Audit and Reporting System](#)
 - [Responsibility for Implementation](#)
 - [Training](#)
 - [Utilization Goals for Individuals with Disabilities](#)
 - [Utilization Summary of Individuals with Disabilities](#)
 - [Action Oriented Programs](#)
 - [Identification of Problem Areas](#)



Contact Information - this page contains the information a Compliance Officer (i.e. auditor) needs to know when conducting a desk audit. The page can list the name and address of the AAP location, the Executive Officer's name and title, the EEO Coordinator's name and address, the parent company of the location, and Dun & Bradstreet, EIN, and EEO-1 numbers for both the location and the parent company.

Equal Employment Opportunity Policy - this required document should be adjusted only upon the guidance of your company's attorney. A copy of this policy must appear in your company's policy manuals, and it must be posted conspicuously on bulletin boards, electronic postings, or other appropriate locations. Applicants and employees with disabilities must be provided the notice in a form that is accessible and understandable to the individual. This includes but is not limited to posting a copy of the notice at a lower height viewable by persons in wheelchairs, or providing Braille or large print versions of the notice.

Harassment - this section is a single sentence that restates the requirement contractors have to ensure that its employees are not harassed on the basis of disability. This section should not be altered unless under the advisement of your company's attorney. Ensure that all managers and supervisors are aware of this requirement.

External Dissemination of Policy - this section restates the regulations that require contractors to communicate its affirmative action efforts externally to external parties. Items 1 and 2 in this section are required, and you should alter these only with the guidance of your company's attorney. Item 3 of this section should be customized to reflect actual actions taken by your company to disseminate policy; add items that are applicable to your company, and remove any that are not applicable. Items 4 and 7 have "safe" language that indicates that you may take those actions; adjust this language to reflect your company's actions. Items 5, 6 and 8 are required actions that you should ensure your company is following through with; you should alter these only with the guidance of your company's attorney.

Assessment of External Outreach and Recruitment Efforts - this section restates the regulations requiring the Assessment of Outreach and Recruitment Activities report. Review the statement, especially the final sentence. Customize the boilerplate language indicating that your company has concluded that the totality of its efforts are effective, and either in this document or a separate one, follow through on the documentation requirements in the Assessment of Outreach and Recruitment Activities below. .

Assessment of Outreach and Recruitment Activities - this report lists outreach carried out on an ongoing basis or on specific dates in the 12 months prior to your current AAP year. You should review the name, dates, description, and evaluation of the activities, and remove/add items as necessary. When adding new items, name the activity, specify whether the activity occurred on a specific date or is ongoing, describe the activity, and write an evaluation about whether the activity is or was successful in attracting disabled candidates. It is best to list activities that target recruitment of individuals with disabilities in any job groups that did not meet utilization goals in the prior AAP year. This report has become increasingly scrutinized in audits, and the OFCCP expects that you maintain detailed documentation that describe your actions in implementing and identifying alternative efforts where underutilization persists.

Internal Dissemination of Policy - this section restates the regulations that require contractors to communicate its affirmative action efforts internally within the company. Ensure that your company is following through on the actions listed, and add any other measures taken to disseminate policy. This required section should be adjusted only upon the guidance of your company's attorney.

Audit and Reporting System - this section is required by regulation, and you should not remove any numbered items. Ensure that your company is following through on the measures listed, and add any other measures taken to ensure affirmative action to recruit Individuals with Disabilities. In an audit, documentation of actions taken to comply with the requirement in this section is required.



Responsibility for Implementation - this page names the EEO Coordinator, whose required responsibilities are listed in this section. Read through the responsibilities to ensure that they are being performed, and add other actions taken above and beyond the required.

Training - this section is required by regulation, and you should not edit or change any part of it without the guidance of your company's attorney. Ensure that all responsible parties are trained to ensure the implementation of your affirmative action program.

Utilization Goals for Individuals with Disabilities - this page is an introduction to the Utilization Summary of Individuals with Disabilities. The language in this section is required and should be altered only with the guidance of your company's attorney. As required by regulation, if any underutilization of individuals with disabilities is identified, you must provide a description of the steps taken to determine whether and where impediments for equal employment opportunity exist. The description must include your assessment of personnel processes, reference to your action oriented programs documentation (see Action Oriented Programs below), the results of your AAP audit (see Audit and Reporting Systems above), and any other areas that might affect the success of your AAP.

Utilization Summary of Individuals with Disabilities - this report compares the number of employees who self identified as individuals with disabilities to the total number of employees in the group. The group's utilization is compared to the Disabled Availability percentage to determine if the group met the goal selected for the group.

Action Oriented Programs - this section states outright that your company has not identified any problem areas; if you see any job groups with "No" in the *Met Goal* column of the Utilization Summary of Individuals with Disabilities you will want to eliminate that statement. You will want to describe good faith efforts to address any underutilization found in the Utilization Summary of Individuals with Disabilities. These efforts should be targeted at drawing individuals into specific job groups that are underutilized.