



Understanding Your Protected Veterans AAP

Affirmative Action Program for Protected Veterans

The AAP for Protected Veterans 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 Protected Veterans AAP:

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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 protected veteran status. 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.

Spouses of Protected Veterans - this section is a single sentence that restates the requirement contractors have to ensure that your company's policies do not exclude qualified individuals because of their relationship or association with a protected veteran. Ensure that all responsible parties are aware of this requirement. 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 is 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 describes 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. In an audit, documentation of actions taken to comply with the requirement in this section is required.

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 Protected Veterans.

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.

Benchmarks for Hiring Veterans - this page is an introduction to the Hiring Benchmark for Protected Veterans report. The language in this section is required and should be altered only with the guidance of your company's attorney.

Benchmark for Protected Veterans - This report shows the hiring benchmark your company has chosen for the current plan year, whether by adopting the National Percentage of Veterans in the Civilian Labor Force percentage that you see by default on your report, or by establishing your own benchmark using the Develop Individualized Hiring Benchmarks instructions at the [VEVRAA Benchmark Database](#). If using the former method of adopting the National Percentage of Veterans in the Civilian Labor Force percentage, ensure that your report reflects the [correct percentage](#).