



Understanding Your Women & Minorities AAP

Affirmative Action Program for Women & Minorities

The AAP for Women & Minorities 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. Unlike the AAP for Protected Veterans and Individuals with Disabilities, the Women & Minorities narrative and statistical materials need not be made available for viewing. See sample notices and other documentation pertaining to the components of your Women & Minorities AAP in Yocom & McKee's [Implementing Your AAP](#) document.

These are the components of the Women & Minorities 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.

Confidential Trade Secret Materials - this is a statement intended to protect you from dissemination of the contents of your affirmative action program by the OFCCP, and is not required. You may want to have your company's counsel review the statement and adjust it as necessary.

Introduction - this is a basic statement of compliance that also serves to absolve your company of the implications of some terminology required by OFCCP regulations, such as "problem areas." This page is not required, and can be adjusted, ideally with the help of legal counsel.

Designation of Responsibility - this page names the high-level manager who is ultimately responsible for implementing the affirmative action plan. The executive officer appoints an EEO Coordinator whose required responsibilities are listed on this page. Read through the responsibilities to ensure that they are being performed, and add other actions taken above and beyond the required.

Identification of Problem Areas - this section is required by regulation, and you should not remove any numbered items. Item 1 is satisfied by the Annual Goals report in the AAP for Women & Minorities. Item 2 is satisfied by the Disparity Analysis - Applicants and Hires in your Support Data document. Item 3 refers to the requirement to evaluate your compensation systems. It is important to note that OFCCP's August 24, 2023 Scheduling Letter requires additional information regarding compensation, including, among other things, an explanation of factors used to determine compensation (item 19), when the compensation analysis was conducted, total employees analyzed (item 22), etc. See Yocom & McKee's [Preparing for an OFCCP Audit](#) document for more details. The actions listed in item 4 are not in your AAP documents; you will want to ensure that your company is indeed carrying through on all actions listed. The bulleted items should not be removed or edited without the guidance of your company's attorney, but you may add to the list as necessary.

Organizational Profile - this page is required and should not be edited without the guidance of your company's attorney. This page describes two of the different types of organizational profiles allowed by regulations. Yocom & McKee, Inc. recommends that the Organizational Display be used because, unlike the Workforce Analysis, it does not display salary data.

Organizational Display - this report is described in a document you may reach by clicking [here](#). You should not edit or change any part of this report.

Organizational Demographics - Companywide - this graph displays the demographic information of your company's current workforce. You should edit no part of this graph.

Workforce by Job Group - this page is required and should not be edited without the guidance of your company's attorney. This page iterates the regulations that require the Job Group Analysis, and affirms that the report is prepared.

Job Group Analysis - this report is described in a document you may reach by clicking [here](#). You should not edit or change any part of this report.



Organizational Demographics - By Job Group - this graph displays the demographic information of each of your company's job groups. You should edit no part of this graph.

Job Group Analysis - Annotations - this report is described in the same document as the Job Group Analysis. You should not edit or change any part of this report.

Determining Availability - this page iterates the regulations that require the Availability Analysis, and states that your company carries out the requirements. There is little to edit on this page, and it should be edited only with the guidance of your company's attorney.

Availability Analysis - this report is described in a document you may reach by clicking [here](#). You should not edit or change any part of this report.

Placement Goals - Comparing Incumbency to Availability - this page iterates the regulations that require the Annual Goals Report, and states that your company carries out the requirements. There is little to edit on this page, and it should be edited only with the guidance of your company's attorney.

Annual Goals Report - this report is described in a document you may reach by clicking [here](#). You should not edit or change any part of this report.

Availability and Utilization Summary Graph - this graph is a visual representation of the results of your Annual Goals Report, and should not be edited or changed in any way.

Action Oriented Programs - this section lists the good-faith efforts your organization takes to reach availability goals and eliminate underutilization and disparity. Review and consider customizing the boilerplate *Selection Process, Recruitment, and Promotions* lists and gather additional documentation that demonstrates the development and execution of action-oriented programs designed to correct any specific problem areas discovered in the areas outlined in [41 CFR 60-2.17\(b\)](#).

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. Along with naming the activity, you should also describe the activity, and write an evaluation about whether the activity is or was successful in attracting women and minority candidates. It is best to list activities that target recruitment of women or minorities in any job groups that had placement goals in the prior AAP year.

Internal Audit and Reporting Systems - 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 reach placement goals.

Religion and National Origin Discrimination Guidelines - this section is required by regulation, and you should not remove any numbered items. Ensure that your company is following through on the activities listed, and add any other activities undertaken to ensure that religion and national origin are not used as a basis for employment decisions. A copy of this document must be included in your company's policy manual.

Accommodation for Religious Observance and Practice - 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.



Nondiscrimination - 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 those responsible for selecting candidates and managing employees are aware of this requirement.