

On March 24, 2014, federal contractors/subcontractors were required to:

- list job openings "in any manner and format" that the appropriate employment service delivery system(s) (ESDS(s)) permit(s) that will allow for priority referrals of protected veterans (go to <http://www.jobbankinfo.org/> to locate your ESDS(s));
- provide additional information to the ESDS(s) concurrent with the first job listing on or after March 24, 2014, as well as anytime there is a change to the information that must be sent to the ESDS(s), including the employer's status as a federal contractor and a request for priority referrals of protected veterans, along with the name, location, and hiring official's contact information for each location within the state;
- ensure notices to applicants and employees are provided in a form that is accessible and understandable;
- post notices electronically for employees who work off-site provided that the employees have access to the electronically posted notices (i.e. notices must be posted in a conspicuous location and format on an intranet site or sent by email);
- incorporate a means of accessing an electronic version of the "EEO is the Law" poster on applicant websites either by using a link to the poster on the EEOC website or, preferably, to a page on your website that contains the poster;
- notify labor organizations about the non-discrimination and affirmative action obligations, if applicable;
- modify the EO "tag line" in all solicitations and advertisements to state that all qualified applicants will receive consideration without regard to veteran status and will not be discriminated against on the basis of disability;
- incorporate the equal opportunity clauses into applicable contracts and subcontracts, using the specific language provided in the regulations in bold text;
- extend reasonable accommodations to qualified individuals with disabilities who are otherwise not able to fully utilize electronic and online job application systems (required) and, if possible, make the online job application system compatible with assistive technologies used by individuals with disabilities (best practice); and
- revise record keeping requirements to retain records on outreach, data collection, and hiring benchmarks for three years.

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On the first day of the AAP year following March 24, 2014, federal contractors/subcontractors are required to:

- begin providing pre-offer and post-offer invitations to self-identify as a protected veteran;
- begin providing pre-offer and post-offer invitations to self-identify as an individual with a disability using the OMB approved form provided by the OFCCP;
- revise the policy statement to indicate "the top U.S. executive's (such as the CEO or the President of the U.S. Division of a foreign company) support for the contractor's affirmative action program...", if needed;
- send written notification of company policy related to your affirmative action efforts to all subcontractors, request their cooperation, and retain documentation;
- undertake appropriate outreach and positive recruitment activities;
- document and review, on an on-going basis, the outreach and recruitment efforts made to identify and recruit qualified protected veterans and individuals with disabilities, evaluate the effectiveness of the efforts, document the evaluations, identify and implement alternative methods if the efforts are not effective, and retain the records for three years;
- incorporate the AA policy in your policy manual, or make it otherwise available to employees;
- notify union officials of the AA policy, if applicable;
- design and implement a self-audit and internal reporting system, document all actions taken to comply with the audit and reporting requirements, undertake any necessary action to bring the AAP into compliance if the AAP is found to be deficient, and retain the documentation for the current and prior AAP years;
- begin collecting and periodically reviewing data on protected veteran status from applicants and hires (i.e. all positions, external/internal and competitive/non-competitive), and retain the records for three years;
- begin collecting and periodically reviewing data on disability status from applicants and hires (i.e. all positions, external/internal and competitive/non-competitive) and retain the records for three years;
- establish a benchmark for hiring protected veterans and retain the records for three years; and
- apply the utilization goal for individuals with disabilities to each job group in the workforce (or to the entire workforce for contractors with 100 or fewer employees).

In the second AAP following March 24, 2014, federal contractors/subcontractors are required to:

- review personnel processes, make any necessary modifications to ensure that obligations are carried out, and document the review (including the date the assessment was performed, any actions taken or changes made as a result of the assessment, and the date of the next scheduled assessment);
- review physical and mental job qualifications to ensure that, to the extent qualification standards tend to screen out qualified disabled veterans or individuals with disabilities, they are job-related for the position in question and are consistent with business necessity and document the assessment, and document the review (including the date the assessment was performed, any actions taken or changes made as a result of the assessment, and the date of the next scheduled assessment);
- review the outreach and recruitment efforts made to identify and recruit qualified protected veterans and individuals with disabilities and evaluate the effectiveness of the efforts, document the evaluations (including the outreach/recruitment activity, the date of the activity, a description, and the evaluation), and identify and implement alternative methods if the efforts are not effective;
- document all actions taken to comply with the audit and reporting system requirements and, where the affirmative action program is found to be deficient, undertake necessary action to bring the program into compliance;
- document the data collected for protected veterans and individuals with disabilities;
- measure the progress toward achieving equal employment opportunity for protected veterans; and
- measure the representation of individuals with disabilities in each job group in the workforce (or to the entire workforce for contractors with 100 or fewer employees) and compare to the utilization goal.

In addition, sometime between first day of the AAP year following March 24, 2014 and the first day of the second AAP following March 24, 2014, the contractor is required to invite all employees to voluntarily self-identify as an individual with a disability, and then again every five years. At least once during the five year intervals, the contractor is required to remind employees that they may change their disability status at any time.