**Federal contractor obligations**

What to do next if your organization is a federal contractor and required to have an AAP?

Answer: (1) prepare a written Affirmative Action Program; (2) track and store employee personnel transaction records and applicant records; (3) fulfil other federal contractor obligations during program implementation.

**I. Written Affirmative Action Program (AAP):**

Your organization has 120 days from the date of signing the federal contract(s), to complete a written affirmative action program (AAP). You can select any date in the calendar year as the AAP effective date. The AAP covers 12 months forward from the effective date and must be updated annually. The AAP covers three programs:

* Women and minorities program covered under Executive Order 11246
* Individuals with disabilities covered under Section 503 of Rehabilitation Act
* Protected veterans covered under Vietnam Era Veterans’ Readjustment Assistance Act

Each U.S. location with 50 or more employees must have its own AAP. They usually are referenced as AAP Locations, AAP Sites, or AA Plans. All employees working remotely or in small locations with fewer than 50 employees, must be covered in the AAP Locations by methods such as geographic rollups or first-level direct-report. The bottom line is that all U.S. employees must be included in an AAP.

**II. Personnel Transaction Tracking and Recordkeeping:**

Your organization must begin to track and keep your personnel transactions including candidate/applicant records, external hires, promotions, internal transfers, and terminations. If you do not have electronic system for recordkeeping already, you may want to consider implementing such systems to track and store the records. Many organizations track the employee transactions in their existing human resources system and track the candidate/applicant records in a separate Applicant Tracking System (ATS).

**III. Program Implementation:**

In addition to preparing a written AAP and tracking personnel transactions, your organization must begin to comply with the other obligations including posting required posters internally; establishing or reviewing existing policies and procedures; external job postings and outreach; evaluations of outreach efforts, etc. We provide a comprehensive Affirmative Action Program Implementation Checklist to assist you in meeting these obligations. The program implementation is ongoing and the details within may be slightly different depending on the results of the AAP each year.