Obligations as an Affirmative Action Employer

The checklist, details, and attachments in this document are applicable on and after March 24, 2014.
Please click here for contractors' obligations prior to March 24, 2014.

CHECKLIST

1. Create your annual written affirmative action plan (AAP).
2. Keep a copy of last year's AAP and its supporting employment activity data on file. See the heading **Record Retention** under *Checklist Details* following this checklist.
3. Create or modify action plans to address any goals/benchmarks and any significant disparities identified in employment decisions. See **Employment Activity** under *Checklist Details*.
4. Review any statistically significant compensation disparities between males and females and between Caucasians and minorities. See **Compensation** under *Checklist Details*.
5. Make sure that policy manuals, if any, contain an equal employment opportunity (EEO)/affirmative action policy statement, sexual harassment and sex discrimination policies, and a religious observance policy.
6. Make sure that your veterans and disabled equal opportunity policy statement is posted on a bulletin board viewable by applicants and employees. See **Equal Opportunity Policy Statement** under *Checklist Details*.
7. Ensure that EEO Posters are in place. See the heading **Posters** under *Checklist Details*.
8. Post notice that informs applicants and employees of where and when the AAP is available for viewing. See **Availability of the AAP for Employee Inspection** under *Checklist Details*.
9. Make contact with minority and women organizations, and document results. Those contacts that do not provide good referrals should be dropped, and alternatives should be chosen.
10. Review outreach and recruitment efforts of covered veterans and individuals with disabilities, and document the review. See **Self Assessment of Outreach and Recruiting** under *Checklist Details*.
11. List all suitable employment openings with the employment service delivery system or state workforce agency job bank. See **Employment Service Delivery System** under *Checklist Details*.
12. Ensure that help wanted ads contain "EEO Employer/Vet/Disabled" clauses. Keep examples of ads. See **Help Wanted Advertisements** in *Checklist Details*.
13. Ensure that job descriptions contain essential job functions.
14. Review pre-employment exams for selection disparities, and have pre-employment tests validated when there is adverse impact.
15. Ensure that individuals with disabilities are given equal access to your company's personnel processes.
16. Ensure that military records relevant only to job performance are considered for employment purposes.
17. Ensure that applicants are requested to self-identify race, gender, disabled status, and veteran status. See the **Self-Identification Forms** section under *Checklist Details*.
18. Ensure that new hires are requested to self-identify disabled and veteran status. See the **Self-Identification Forms** section under *Checklist Details*.
19. Ensure that the workplace is disabled accessible.
20. Survey the current workforce for disability status at least once every five years, and send out reminders once during the interim.
21. Document requests and the outcome of reasonable accommodation due to disabilities and religious practices.
22. Keep all disability status information in a separate "Data Analysis File."
23. Review Union Agreements to ensure that they contain an affirmative action clause. See **Notifying Labor Unions** under *Checklist Details*.
24. Review contracts to ensure that they include the EEO/affirmative action clause. See **Purchase Orders/Contracts** under *Checklist Details*.
25. Inform your vendors and suppliers of their AAP obligations. See **Letters to Vendors, Subcontractors and Suppliers** under *Checklist Details*.

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CHECKLIST DETAILS

RECORD RETENTION

41 CFR § 60-1.12, 41 CFR § 60-300.44(f)(4), 41 CFR § 60-300 .44(k), 41 CFR § 60-300.80, 41 CFR § 60-741.44(f)(4), 41 CFR § 60-741 .44(k) and 41 CFR § 60-741.80

Each establishment must maintain its current and preceding AAPs and supporting documentation. Under affirmative action regulations covering women and minorities, personnel and employment records made or kept by a contractor must be preserved for two years from the date of the record or from the date of the personnel action, whichever occurs later. However, the record retention period is one year if the contractor has fewer than 150 employees or does not have a federal contract of at least $150,000. Records relating to veteran and disability status, including personnel records and records pertaining to benchmark, must be retained for three years regardless of the number of employees and the amount of the federal contract.

EMPLOYMENT ACTIVITY

41 CFR § 60-2.17(b)(2), [41 CFR § 60-300.44(b) and 41 CFR § 60-741.44(b)

Regulations require that contractors maintain support data for the affirmative action plan, such as progression line charts, seniority rosters (if applicable), applicant flow data, adverse impact analysis reports, promotion data, transfer data, and termination data for women and minorities. Contractors must also gather, analyze, and retain applicant and hire data for veterans and the disabled. The Office of Contract Compliance Programs (OFCCP) closely scrutinizes applicant flow and rejection data during an audit. The purpose of the scrutiny is to determine whether race or gender was a factor in the employment selection decisions. If during an audit a company cannot prove that persons who were hired were more qualified than those who were not hired, the OFCCP may insist that rejected applicants be offered positions and be given back pay to the date they were initially, wrongfully rejected.

COMPENSATION

41 CFR § 60-2.17(b)(3)

After running compensation reports under attorney client privilege, attempt to identify non-discriminatory factors such as duties, responsibilities, seniority, time-in-position, education, and performance ratings that might explain statistically significant differences in salary. A Salary Regression Analysis is a very useful tool that can factor in these explanatory variables and a first step in determining if the salary disparity is statistically significant. A comprehensive cohort analysis is the next step to help identify potential problem areas.

EQUAL OPPORTUNITY POLICY STATEMENT

41 CFR § 60-300.44(a), 41 CFR § 60-741.44(a)

The Equal Opportunity Policy Statement included in your veterans and disabled AAPs 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.

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POSTERS

41 CFR § 60-300.5(a)(9), 41 CFR § 60-741.5(a)(4), 41 CFR § 60-1.4(a), and 29 CFR Part 741, Appendix A to Subpart A

Posters with specific EEO, Veterans and individuals with disabilities language and notice of employee rights under the NLRA pursuant to E.O. 13496 must be posted at the workplace and on company websites, visible to both current employees and applicants. The OFCCP or the Equal Employment Opportunity Commission (EEOC) office in your area can help you obtain the official posters. See http://www.dol.gov/ofccp/regs/compliance/posters/ofccpost.htm for the EEO notice requirements, and for the E.O. 13496 notice requirements, see http://www.dol.gov/olms/regs/compliance/EO13496.htm.

AVAILABILITY OF THE AAP FOR EMPLOYEE INSPECTION

41 CFR § 60-300.41 and 41 CFR § 60-741.41

The Disabled and Veterans portions of the affirmative action plan, absent the applicant and hire data, must be available for inspection upon request to any employee or applicant. The Women & Minorities narrative and statistical materials need not be made available for viewing. A notice identifying the location and hours during which employees and applicants have access to the Disabled and Veterans affirmative action plans must be posted. This is usually done by placing the notice on company letterhead on a company bulletin board next to the EEO poster. See Attachment 1.

SELF-ASSESSMENT OF OUTREACH AND RECRUITING

41 CFR § 60-300.44(f)(3) • 503: 41 CFR § 60-741.44(f)(3)

The VEVRAA and Section 503 regulations require that contractors annually evaluate the effectiveness of outreach efforts. Contractors must determine if each recruitment effort and if the totality of their efforts are effective in identifying and recruiting qualified protected veterans and individuals with disabilities. The self-assessment must include among its criteria at least the applicant and hire data for this year and for the two most recent years. See Attachment 2.

HELP WANTED ADVERTISEMENTS

41 CFR § 60-300.5(a)(12), 41 CFR § 60-741.5(a)(7)

Help wanted solicitations must state that all qualified applicants will be considered without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, veteran, or disabled status. One abbreviated example the OFCCP uses to meet this obligation is: EEO Employer/Vet/Disabled. An unabbreviated version might read, "[Company] is an equal opportunity employer. All qualified applicants will receive consideration for employment without regard to race, religion, color, national origin, sex, sexual orientation, gender identity, age, status as a protected veteran, among other things, or status as a qualified individual with disability."

EMPLOYMENT SERVICE DELIVERY SYSTEM

41 CFR § 60-300.5(a)(2)

In addition to advertising you may undertake, you must also list all employment openings with your state employment service delivery system (ESDS). "All employment openings" includes all positions except executive- and top management-level positions, positions that are filled from within the contractor's organization, and positions that last three days or less. Listing with ESDS does not require that you hire any particular applicant.

Four pieces of background information must be given to ESDS when first listing jobs and whenever there is a change to any of the following four items:

1. Your company is a federal contractor subject to VEVRAA
2. You desire "priority referrals" of protected veterans
3. The name and location of each hiring location within the state
4. Contact information for the hiring officer at each location, including any 3rd party search companies.

The listing must be made in the manner and format permitted by the local ESDS. See Attachment 3.

SELF-IDENTIFICATION FORMS

41 CFR § 60-1.12(c)(ii), 41 CFR § 60-300.42 and 41 CFR § 60-741.42

A Pre-employment Information Form for Women and Minorities must be given to each applicant to complete. Completed Voluntary Identification forms should be kept in a file separate from other applicant/employee information. The government allows contractors to visually determine race and sex when applicants refuse to self-identify. See Attachment 4. The Vietnam Era Veterans Readjustment Assistance Act require affirmative action employers to invite all eligible veterans to identify themselves. The Pre- and Post-Offer Self-Identification Form for Eligible Veterans must be given to all applicants, and must be given to all new-hires after they have been offered a job but before they begin their first day of work; see attachment 5. Section 503 of The Rehabilitation Act requires affirmative action employers to invite all disabled individuals to identify themselves. The linked form on attachment 6 is the only form that has been provided by the OFCCP to serve as both the Pre-Employment and Post-Offer Information Forms for the Disabled.

NOTIFYING LABOR UNIONS

41 CFR § 60-300.5(a)(10) and 41 CFR § 60-741.5(a)(5)

Contractors must notify each labor union with which it has a current collective bargaining agreement of its commitment to nondiscrimination, and to take affirmative action to employ qualified disabled individuals and protected veterans. Contractors must also request the cooperation of labor unions to these commitments. This notice is only required to be sent once per collective bargaining agreement, unless the agreement is altered, amended, or modified See Attachment 7.

PURCHASE ORDERS/CONTRACTS

41 C.F.R § 60-300.5(a)(11), 41 C.F.R § 60-741.5(a)(6), 41 CFR § 60-1.4(a), and 29 CFR Part 741, Appendix A to Subpart A

An Equal Employment Opportunity (EEO) Clause for individuals with disabilities, covered veterans, women, and minorities, and a clause relating to employee rights under the National Labor Relations Act (NLRA) must be incorporated in bold print into each non-exempt subcontract. A common practice is to place the clause on all subcontracting documents without assessing on an individual basis whether each subcontractor is covered by affirmative action requirements. See Attachment 8.

NOTIFICATION TO VENDORS, SUBCONTRACTORS & SUPPLIERS

41 CFR § 60-300.44(f)(1)(ii) and 41 CFR § 60-741.44(f)(1)(ii)

These regulations require contractors to notify subcontractors, vendors and suppliers of its equal opportunity policy and request appropriate action on their part. See Attachment 9.

ATTACHMENT 1

NOTICE OF AFFIRMATIVE ACTION PLAN FOR INDIVIDUALS WITH DISABILITIES, DISABLED VETERANS AND OTHER ELIGIBLE VETERANS

It is the policy of this Company to seek and employ qualified individuals at all locations and facilities, and to provide equal employment opportunities for all applicants and employees in recruiting, hiring, placement, training, compensation, insurance, benefits, promotion, transfer, and termination. To achieve this, we are dedicated to taking affirmative action to employ and advance in employment qualified individuals with disabilities, disabled veterans, and other eligible veterans.

The objective in adopting the Affirmative Action Programs is to place qualified individuals with disabilities, disabled veterans and other eligible veterans in all job classifications. These Affirmative Action Programs are available for inspection by any applicant or employee by contacting the Company's EEO Coordinator, in the Human Resources office, Monday through Friday, 8am to 5pm.

(This Notice must be posted where employees and applicants will view it.)

ATTACHMENT 2

SAMPLE ASSESSMENT OF OUTREACH AND RECRUITMENT ACTIVITIES

Outreach/Recruitment Activity	Date of Activity	Description	Evaluation
Listed job openings with local Veteran	Ongoing	In addition to listing openings with local Employment Service Delivery System (ESDS), openings are also listed with a local Veteran Advocacy Group.	Received 32 applications from protected veterans, of which 4 were hired. This is an effective activity.
Briefing of Vet-Reps in local community college campus	July 15, 2014	Briefed Vet-Reps of Contractor's services and current hiring needs.	Will begin sending job listings to Vet-Reps for assistance in attracting veteran applicants. This is an ongoing effort and we will monitor the success of this initiative.
Participated in Veteran JobFair	November 13, 2014	Veteran Job Fair was hosted by local veterans' groups, and over 30 employers participated.	Received 25 applications from qualified veterans. Conducted 15 initial interviews. 10 follow-up interviews were scheduled, which resulted in 3 hires. This is a successful outreach effort.

Criteria for Evaluation:

1. Did the activity attract qualified applicants with disabilities and/or protected veterans?
2. Did the activity result in the hiring of qualified individuals with disabilities and/or protected veterans?
3. Did the activity expand Contractor's outreach to individuals with disabilities and/or protected veterans in the community?

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ATTACHMENT 3

NOTIFICATION TO EMPLOYMENT SERVICE DELIVERY SYSTEM

[Company] is a federal contractor or subcontractor subject to the requirements of the Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) of 1974, as amended (38 U.S.C. § 4212).

We request priority referrals of protected veterans for job openings. The following is a list of [Company] hiring locations in the state for which [Company] seeks to list available openings:

1. [Name of company's first hiring location]
   Attn: [Name of hiring official at this location]
   Address of hiring location in the state
   Contact information (phone, email, etc.) for hiring official at this location .

2. [Name of company's second hiring location]
   Attn: [Name of hiring official at this location]
   Address of hiring location in the state
   Contact information (phone, email, etc.) for hiring official at this location
   (Etc.)

We are also using the following external job search organization(s) to assist us to hire individuals for available openings:

1. [Name of External Job Search Organization]
   Attn: [Name of Contact Individual with the external job search organization]
   Contact information (address, phone, email, etc.)

If our contact information changes, we will notify you with our next listing to your agency.

Sincerely,

[Company contact]

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ATTACHMENT 4

Please click here for a Word version of the Pre-Employment Self-ID Form for Women and Minorities.

PRE-EMPLOYMENT INFORMATION FORM FOR WOMEN AND MINORITIES

Race/Ethnic Group:

Are you Hispanic/Latino?	☐	If yes, check box and skip to Gender. Others use the race categories below:
White	☐	
Black	☐	
Asian	☐	
Am Indian/Alaska Native	☐	
Hawaiian/Pacific Islander	☐	
Two or More Races	☐	

Gender: Male: _____ Female: _____

I do not wish to disclose my race/ethnic and/or gender status ☐

_____ _____

Date Name

_____

Signature

Please complete this information to assist us in complying with equal opportunity/affirmative action record keeping and reporting requirements. Providing this information is voluntary, refusal to provide the information will not result in any adverse treatment. This Information Form will be kept in a separate, confidential file and will be used only for government reporting purposes.

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ATTACHMENT 5

Please click here for a Word version of the Pre- and Post-Offer Self-ID Form for Protected Veterans.

PRE- AND POST-OFFER SELF-IDENTIFICATION FORM FOR PROTECTED VETERANS

This employer is a Government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. § 4212 (VEVRAA), which requires Government contractors to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans. These classifications are defined as follows:

- A "disabled veteran" is one of the following:
  - a veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or
  - a person who was discharged or released from active duty because of a service-connected disability.
- A "recently separated veteran" means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.
- An "active duty wartime or campaign badge veteran" means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.
- An "Armed forces service medal veteran" means a veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

Protected veterans may have additional rights under USERRA—the Uniformed Services Employment and Reemployment Rights Act. In particular, if you were absent from employment in order to perform service in the uniformed service, you may be entitled to be reemployed by your employer in the position you would have obtained with reasonable certainty if not for the absence due to service. For more information, call the U.S. Department of Labor's Veterans Employment and Training Service (VETS), toll-free, at 1-866-4-USA-DOL.

If you believe you belong to any of the categories of protected veterans listed above, please indicate by checking the appropriate box below. As a Government contractor subject to VEVRAA, we request this information in order to measure the effectiveness of the outreach and positive recruitment efforts we undertake pursuant to VEVRAA.

[ ] I IDENTIFY AS ONE OR MORE OF THE CLASSIFICATIONS OF PROTECTED VETERAN LISTED ABOVE

[ ] I AM NOT A PROTECTED VETERAN

[ ] I DO NOT WISH TO DISCLOSE MY STATUS

If you are a disabled veteran it would assist us if you tell us whether there are accommodations we could make that would enable you to perform the essential functions of the job, including special equipment, changes in the physical layout of the job, changes in the way the job is customarily performed, provision of personal assistance services or other accommodations. This information will assist us in making reasonable accommodations for your disability.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are consistent with the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended.

The information you submit will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans, and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and (iii) Government officials engaged in enforcing laws administered by the Office of Federal Contract Compliance Programs, or enforcing the Americans with Disabilities Act, may be informed.

_____ _____

Date Name

_____

Signature

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ATTACHMENT 6

PRE- AND POST-OFFER INFORMATION FORM FOR INDIVIDUALS WITH DISABILITIES

The OFCCP intends that the Voluntary Self-Identification of Disability Form will be used for:

1. *Pre-offer voluntary self-ID*
2. *Post-offer voluntary self-ID*
3. *First year survey of workforce*
4. *Every 5th year survey of workforce*

Contractors may create an electronically fillable copy of the form provided it meets certain requirements:
Display the OMB number and expiration date; Contain the text of the form without alteration; Use a sans-serif font, such as Calibri or Arial; and Use at least 11-pitch for font size (with the exception of the footnote and burden statement, which must be at least 10-pitch in size).

Completed forms should be kept in a separate "Data Analysis File" - not in the personnel file or your medical file. Please click here for a Word version of the Self-ID form shown below.

Voluntary Self-Identification of Disability

Form CC-305
OMB Control Number 1250-0005
Expires 1/31/2017
Page 12 of 16

Why are you being asked to complete this form?

Because we do business with the government, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities.[1] To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. Completing this form is voluntary, but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

How do I know if I have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

- Blindness
- Deafness
- Cancer
- Diabetes
- Epilepsy
- Autism
- Cerebral palsy
- HIV/AIDS
- Schizophrenia
- Muscular dystrophy
- Bipolar disorder
- Major depression
- Multiple sclerosis (MS)
- Missing limbs or partially missing limbs
- Post-traumatic stress disorder (PTSD)
- Obsessive compulsive disorder
- Impairments requiring the use of a wheelchair
- Intellectual disability (previously called mental retardation)

Voluntary Self-Identification of Disability

Please check one of the boxes below:

- ☐ YES, I HAVE A DISABILITY (or previously had a disability)
- ☐ NO, I DON'T HAVE A DISABILITY
- ☐ I DON'T WISH TO ANSWER

Click here to enter text.
Your Name

Click here to enter text.
Today's Date

Reasonable Accommodation Notice

Federal law requires employers to provide reasonable accommodation to qualified individuals with disabilities. Please tell us if you require a reasonable accommodation to apply for a job or to perform your job. Examples of reasonable accommodation include making a change to the application process or work procedures, providing documents in an alternate format, using a sign language interpreter, or using specialized equipment.

[1] Section 503 of the Rehabilitation Act of 1973, as amended. For more information about this form or the equal employment obligations of Federal contractors, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at www.dol.gov/ofccp.

PUBLIC BURDEN STATEMENT: According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about 5 minutes to complete.

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ATTACHMENT 7

SAMPLE LETTER - DISSEMINATED TO UNION

Dear _____:

(Company) strives to comply with the requirement of Executive Order 11246, as amended, related to affirmative action; Section 503 of the Rehabilitation Act and the Americans with Disabilities Act, covering the employment of the disabled; and the Vietnam Era Readjustment Assistance Act of 1974 as amended, covering the employment of veterans. Please consider this letter as official notice that we do not discriminate against protected veterans and individuals with disabilities and are committed to take affirmative action to employ and advance in employment protected veterans and individuals with disabilities. We ask your cooperation in doing the same.

We appreciate your cooperation in our effort to fully comply with these Federal requirements.

Sincerely,

(Name)
EEO Coordinator

ATTACHMENT 8

PURCHASE ORDER/SUBCONTRACT CLAUSES

The following clause must be included in all Purchase Orders unless the contract is exempt under the rules and regulations of the Secretary of Labor. **(Text referencing the individuals with disabilities and protected veteran regulations must be in bold and must include introductory citation to 41 CFR.)** This combined clause includes references to requirements related to EEO laws under 41 CFR § 60-1.4(a), protected veterans under 41 CFR § 60-300.5, individuals with disabilities under 41 CFR § 60-741.5, and employee rights under the NLRA pursuant to 29 CFR Part 741, Appendix A to Subpart A and E.O. 13496.

This contractor and all covered subcontractors shall abide by the requirements of 29 CFR Part 741, 41 CFR § 60-1.4(a), Appendix A to Subpart A, 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin. Moreover, these regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability.

ATTACHMENT 9

SAMPLE LETTER – SUBCONTRACTORS, VENDORS & SUPPLIERS

[Company] is a covered federal contractor [or subcontractor] and must comply with certain affirmative action efforts. Also, pursuant to 41 CFR § 60- 300.44(f)(i)(ii), implementing 38 U.S.C. § 4212, a portion of the Vietnam Era Veterans Readjustment Assistance of 1974, and 41 CFR § 60-741.44(f)(i)(ii), implementing Section 503 of The Rehabilitation Act of 1973; [our Company] must send you written notification of our affirmative action efforts on behalf of protected veterans and individuals with disabilities.

[Company] expects all of its subcontractors, suppliers and vendors to comply with all of their applicable obligations under Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. § 4212 or any other law requiring equal opportunity for disabled persons, and other protected veterans. Further, the equal employment opportunity clauses set forth in 41 CFR § 60-1.4(a), 41 CFR 60-300.5(a) and 41 CFR § 60-741.5(a) are hereby incorporated by reference into all of the transactions between our companies.

We appreciate your cooperation in our effort to fully comply with these Federal requirements.

_____
[Name]
[Title]