



April 25, 2014

VIA ELECTRONIC SUBMISSION: <http://www.regulations.gov>

Mr. William Torrans
Office of National Programs (ONP)
Veterans Employment and Training Service (VETS)
Room S-1316
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Proposed Revisions to the Regulations Implementing Reporting Requirements Under the

align the VETS reporting requirements with those regulations. AGC, does however, have one suggestion in furtherance of this objective. If implemented without changes, the proposed rule will require contractors to begin complying with the new reporting requirements “one year after the effective date of the final rule.” AGC recommends that contractors with existing Affirmative Action Programs (AAP) not become subject to comply with the new reporting requirements until “*one year after the effective date of the final rule, or at the start of their next AAP cycle, whichever is later.*” OFCCP saw fit to allow contractors this flexibility by incorporating the following statement in its recent regulations regarding veterans and individuals with disabilities:

Current contractors subject to subpart C of the existing 41 CFR part 60–300 regulations that have written affirmative action programs (AAP) prepared pursuant to those regulations in place on the effective date of this final rule may maintain that AAP for the duration of their AAP year. Such contractors are required to update their affirmative action programs to come into compliance with the requirements of subpart C of this final rule at the start of their next standard 12-month AAP review and updating cycle.