



EQUAL EMPLOYMENT OPPORTUNITY IN APPRENTICESHIP

Quick Guide to EEO Activities and Resources for Sponsors

In 2016, the U.S. Department of Labor released updated Equal Employment Opportunity (EEO) regulations for Registered Apprenticeship programs. The provisions in the regulations are phased-in over two years to provide sponsors with a smooth and easy transition period.

Office of Apprenticeship (OA) sponsors can use this quick guide to track their responsibilities under the apprenticeship EEO regulations. The guide lists the activities to be carried out by sponsors, organized by the dates on which provisions go into effect. The section of the EEO regulations is listed for reference. The guide also contains links to resources and tools that will help sponsors implement the EEO regulations. All apprenticeship sponsors will continue to be responsible for avoiding discrimination on the basis of protected characteristics and for complying with all applicable federal and state EEO laws and regulations.

Apprenticeship sponsors registered with State Apprenticeship Agencies will also be responsible for the activities listed in this table, but the deadlines for implementation will depend on when each state enacts language adopting the updated EEO regulations. For more information on the apprenticeship EEO regulations, visit www.doleta.gov/oa/eo.

PROVISIONS IN EFFECT JANUARY 18, 2017

| <i>Topic</i> | <i>Activity</i> | <i>Resources</i> |
|-----------------------------|--|---|
| <i>Selection procedures</i> | Sponsors are permitted to use any procedures for selecting apprentices that are not discriminatory. ~ [Section 30.10] | ● <u>Resources to Identify Non-discriminatory Apprentice Selection Procedures</u> |
| <i>Complaint procedures</i> | Begin posting notice to all applicants and apprentices of their right to file a discrimination complaint and the procedures for doing so. Also include information about filing a complaint in applications for apprenticeship. ~ [Section 30.14] | ● <u>EEO Complaints</u> |



PROVISIONS IN EFFECT JULY 17, 2017

| Topic | Activity | Resources |
|---|---|---|
| <i>Non-discrimination: Expanded characteristics</i> | Add new characteristics – disability, age (40 and older), sexual orientation, and genetic information – to protection from discrimination involving all personnel practices. ~ [Section 30.3(a)(1)] | <ul style="list-style-type: none"> ● <u>Protected Characteristics Pages</u> |
| <i>Oversight of EEO</i> | Assign responsibility for overseeing EEO in the apprenticeship program. ~ [Section 30.3(b)(1)] | |
| <i>Display of updated EEO pledge</i> | Inform all apprentices and apprenticeship applicants of the organization’s commitment to EEO by posting and publishing the updated EEO pledge. ~ [Section 30.3(b)(2)] | <ul style="list-style-type: none"> ● <u>EEO Pledge and Complaints Poster</u> |
| <i>Outreach and recruitment</i> | Implement outreach and recruitment measures, such as developing a list of recruitment sources, that extend to all persons available for apprenticeship in the recruitment area. ~ [Section 30.3(b)(3)] | <ul style="list-style-type: none"> ● <u>Outreach and Recruitment Resources</u> |
| <i>Anti-harassment training</i> | Provide anti-harassment training to apprentices, journeyworkers and others who regularly work with apprentices. This training may be provided in conjunction with other training planned by the sponsor. | <ul style="list-style-type: none"> ● <u>Anti-Harassment Training Materials</u> |
| <i>Harassment/intimidation complaints</i> | Implement procedures to handle and resolve complaints of harassment and intimidation. ~ [Section 30.3(b)(4)] | |



PROVISIONS IN EFFECT JANUARY 18, 2019*

| Topic | Activity | Resources |
|---|---|--|
| <i>Initial review of personnel practices</i> | Conduct an initial review of the apprenticeship program’s personnel practices. Update, as needed, to meet requirements, and review practices annually thereafter. ~ [Section 30.9] | |
| <i>Initial written affirmative action plan</i> | Develop and maintain a written affirmative action plan. ~ [Section 30.4] | <ul style="list-style-type: none"> ● <i>Under Development</i> |
| <i>Initial workforce analysis</i> | Conduct a workforce analysis to identify the race, sex, ethnicity and disability status of apprentices for each of the program’s occupations. ~ [Section 30.5(b)] | <ul style="list-style-type: none"> ● <i>Under Development</i> |
| <i>Begin invitation for self-identification of disability</i> | Applicants for apprenticeship and current apprentices must be invited to self-identify whether they are an individual with a disability. ~ [Section 30.11] | <ul style="list-style-type: none"> ● <u>Disability Self-Identification Information</u> ● <u>Understanding the 7% Disability Utilization Goal</u> |

* **New sponsors** that register with the Office of Apprenticeship will have two years from their date of registration to implement these provisions.



PROVISIONS IN EFFECT AT SPONSOR’S FIRST COMPLIANCE REVIEW AFTER JANUARY 18, 2017

| <i>Topic</i> | <i>Activity</i> | <i>Resources</i> |
|--|--|--|
| <i>Utilization and availability analyses for race, sex and ethnicity</i> | <p>Determine whether the race, sex and ethnicity of apprentices – by major occupational group – reflects the racial, sex and ethnic representation of available individuals in the relevant recruitment area.</p> <p style="text-align: center;">~ [Section 30.5]</p> | ● <i>Under Development</i> |
| <i>Utilization goal (if necessary) for race, sex and ethnicity</i> | <p>Where analysis shows the program’s inclusion of minorities and women is significantly less than would be expected, based on their availability in the recruitment area, the sponsor must establish a percentage goal at least equal to the availability figure derived from the analysis.</p> <p style="text-align: center;">~ [Section 30.6]</p> | ● <i>Under Development</i> |
| <i>Utilization analysis for individuals with disabilities</i> | <p>If individuals with disabilities are represented in the sponsor’s apprenticeship workforce at a rate less than the national goal of 7%, sponsor must take steps (such as targeted outreach, recruitment and retention activities) to correct any impediments to equal opportunity.</p> <p style="text-align: center;">~ [Section 30.7]</p> | ● <i>Under Development</i> |
| <i>Targeted outreach and recruitment</i> | <p>Conduct targeted outreach, recruitment and retention activities, where underutilization of a specific group or groups is identified and utilization goals are established, or where impediments to equal opportunity exist.</p> <p style="text-align: center;">~ [Section 30.8]</p> | ● <u>Outreach and Recruitment Resources</u> |