## Appendix C

# *(SAMPLE)*
# AFFIRMATIVE ACTION PLAN

# ADOPTED BY

# *(INSERT EMPLOYERS NAMES OR EMPLOYER GROUP NAME OR ASSOCIATION)*

# *(INSERT NAME OF UNION OR LABOR ORGANIZATION)*

**AS REQUIRED UNDER TITLE 29, CODE OF FEDERAL REGULATIONS, PART 30**
**AMENDED MAY 12, 1978**

**DEVELOPED IN COOPERATION WITH THE**
**U. S. DEPARTMENT OF LABOR**
**OFFICE OF APPRENTICESHIP**

**APPROVED BY:** _____
**REGISTRATION AGENCY**

**DATE APPROVED:** _____

## SECTION I - INTRODUCTION

The JATC enters this Affirmative Action Plan (AAP) with good faith for the purpose of promoting equality of opportunity into its Registered Apprenticeship Program. The JATC seeks to increase the recruitment of qualified women and/or minorities for possible selection into the apprenticeship program in the event women and/or minorities are underutilized in the apprenticeship program. The JATC hereby adopts the following nondiscriminatory pledge and the AAP.

This AAP is a supplement to the Apprenticeship Standards. Any changes made by the JATC will become part of this written AAP, once approved by the Registration Agency.

## SECTION II - EQUAL OPPORTUNITY PLEDGE

The JATC commits to the following Equal Opportunity Pledge:

"The recruitment, selection, employment, and training of apprentices during their apprenticeship, shall be without discrimination because of race, color, religion, national origin, or sex. The Sponsor will take affirmative action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required under Title 29 of the Code of Federal Regulations, part 30."

## SECTION III - UTILIZATION AND ANALYSIS, GOALS AND TIMETABLES

In order to allow positive recruitment and full utilization of minorities and women in the apprenticeship program, the JATC pledges to identify outreach efforts under Section IV which will be undertaken. The purpose of the analysis is to determine the minority and women's labor force in the JATC's labor market area. Once the labor force is determined, the JATC can determine if deficiencies exist in terms of underutilization of minorities and/or women in the occupations registered with the Registration Agency. (See attached Affirmative Action Plan Workforce Analysis Worksheet)

## SECTION IV - OUTREACH AND POSITIVE RECRUITMENT

The JATC's AAP includes the following "checked" outreach and positive recruitment efforts that would reasonably be expected to increase minority and women's participation in apprenticeship by expanding the opportunity of minorities and women to become eligible for apprenticeship selection. **Once those efforts have been checked, the JATC will set forth the specific steps they intend to take under each identified effort.** The JATC will identify **a significant number of activities** in order to enable it to meet its obligation under Title 29, CFR part 30.4(c).

A. ☐ An announcement of specific apprenticeship openings must be disseminated thirty (30) days in advance of the earliest date for application at each interval to the following agencies/organizations:

- Registration Agency
- Women's Organizations/Centers
- Local Schools
- Employment Service Centers
- One Stop Centers
- Vocational Education Schools
- Other Organizations/Centers (which can effectively reach minorities and women)
- Newspapers (which are circulated in the minority community and among women)

The announcement will include the nature of the apprenticeship, requirements for admission to apprenticeship, availability of apprenticeship opportunities, sources of apprenticeship applications, and the JATC's equal opportunity policy. The period for accepting applications as established by the JATC is: _____

B. ☐ Participation in annual workshops conducted by employment service agencies for the purpose of familiarizing school, employment service and other appropriate personnel with the apprenticeship program and current opportunities.

C. ☐ Cooperation with school boards and vocational educational systems to develop programs for preparing students to meet the standards and criteria required to qualify for entry into the apprenticeship program.

D. ☐ Internal communication of the JATC's equal opportunity policy should be conducted in such a manner to foster understanding, acceptance, and support among the JATC's various officers, supervisors, employees, and members, and to encourage such persons to take the necessary action to aid in meeting its obligation under Title 29, CFR part 30.

E. ☐ Engaging in programs such as outreach for the positive recruitment and preparation of potential applicants for apprenticeships; where appropriate and feasible, such programs will provide for pre-testing experience and training. In initiating and conducting these programs, the JATC may be required to work with other JATCs and appropriate community organizations. The JATC will also initiate programs to prepare women and encourage women to enter traditionally male programs.

F. ☐ Encouraging the establishment and utilization of programs of pre-apprenticeship, preparatory trade training, or others designed to afford related work experience or prepare candidates for apprenticeship. The JATC will make appropriate provisions in its AAP to assure that those who complete such programs are afforded full and equal opportunity for admission into the apprenticeship program.

G. ☐ Utilizing journeyworkers to assist in the implementation of affirmative action in the apprenticeship program.

H. ☐ Granting advance standing or credit on the basis of previously acquired experience, training, skills, or aptitude for all applicants equally.

I. ☐ Other appropriate action to ensure that the recruitment, selection, employment, and training of apprentices during their apprenticeship will be without discrimination because of race, color, religion, national origin, or sex (e.g., general publication of apprenticeship opportunities and advantages in advertisements, industry reports, articles, etc., use of present minority and women apprentices and journeyworkers as recruiters; career counseling; development of reasonable procedures to ensure employment opportunity, including reporting systems, on-site reviews, briefing sessions).

**(Identify Action:)**

_____
_____
_____
_____
_____
_____
_____
_____
_____

**FOR EACH ITEM CHECKED IN SECTION IV, LIST EACH SPECIFIC STEP THAT THE JATC WILL UNDERTAKE TO FULFILL THAT OUTREACH AND RECRUITMENT STEP**

_____
_____
_____
_____
_____
_____

*(add additional pages as necessary)*

## SECTION V - ANNUAL REVIEW OF AFFIRMATIVE ACTION PLAN

The JATC will make an annual review of its current AAP and its overall effectiveness and institute any revisions or modifications warranted. The review will analyze (independently and collectively) the affirmative action steps taken by the JATC for evaluating the positive impact, as well as the adverse impact in the areas of outreach and recruitment, selection, employment, and training. They will work diligently to identify the cause and affect that result from their affirmative action measures. The JATC will continually monitor these processes in order to identify the need for a new affirmative action effort and/or deletion of ineffective existing activity(ies). All changes to the AAP must be submitted to the Registration Agency for approval. The JATC will continually monitor the participation rates of minorities and women in the apprenticeship program in an effort to identify any type of underutilization. If underutilization exists, corrective action will be immediately implemented. The goals and timetables also will be reviewed periodically as determined by the Registration Agency and updated where necessary.

## SECTION VI - OFFICIAL ADOPTION

**The *(Insert Employers Name or Employer Group Name or Association) (Insert Union or Labor Organization's Name)* hereby officially adopts this Affirmative Action Plan on this _____Day of (Insert Month/Year).**

| | |
|---|---|
| _____ | _____ |
| **Signature of Management** | **Signature of Labor** |
| _____ | _____ |
| **Printed Name** | **Printed Name** |
| _____ | _____ |
| **Signature of Management** | **Signature of Labor** |
| _____ | _____ |
| **Printed Name** | **Printed Name** |

*Sponsor(s) may designate the appropriate person(s) to sign the Standards on their behalf.*

# AFFIRMATIVE ACTION PLAN
# WORKFORCE ANALYSIS WORKSHEET

## A. SPONSOR INFORMATION

| | | |
|---|---|---|
| Program Number: | | |
| Name of Sponsor: | | |
| Address: | | |
| City/State/Zip Code: | | |
| Contact Person: | | |
| Phone Number: | | FAX Number: |
| E-Mail Address: | | |

## B. OCCUPATIONAL INFORMATION

| | |
|---|---|
| Occupational Title: * | |
| RAPIDS Code: | O*NET/SOC Code: |
| Type of selection method used: | |
| Labor Market Area description: | |

## C. LABOR MARKET AREA & OCCUPATIONAL PARTICIPATION DATA

| | | |
|---|---|---|
| **C.1 Total Labor Force in Labor Market Area *** | | |
| Number of Women: | | % of labor force |
| Number of Minorities: | | % of labor force |
| **C.2 Working Age Population in Labor Market Area *** | | |
| Number of Women: | | % of labor force |
| Number of Minorities: | | % of labor force |
| **C.3 Apprentice Participation in Craft/Occupation in National Apprenticeship System **** | | |
| Number of Women: | | % of apprentices |
| Number of Minorities: | | % of apprentices |
| **C.4 The General Availability of Minorities and Women with the Present or Potential Capacity for Apprenticeship in Program Sponsor's Labor Market Area. ***** | | |
| Number of Women: | | |
| Number of Minorities: | | |

Resources for obtaining labor market information.

* http://www.census.gov/hhes/www/eeoindex/page_c.html

** RAPIDS Data available from Registration Agency.

*** Program Sponsors may use any reasonable method for determining the general availability of minorities and women with the present or potential capacity for apprenticeship, including relying on the data recorded in Section C.1 for "Total Labor

Force", C.2 for "Working Age Population", and C.3 "Apprentice Participation in Particular Craft/Occupation" to propose the entries for "The General Availability of Minorities and Women."

## D. SPONSOR'S WORKFORCE DATA

| | | |
|---|---|---|
| D.1 Total Number of Journey/Craft Workers Employed: | | |
| Number of Women: | | % of work force |
| Number of Minorities: | | % of work force |
| D.2 Total Percentage of Apprentices or of Applicant Pool (depending on selection method used) | | |
| Numerical percentage of Women apprentices or women in applicant pool: | | % |
| Numerical percentage of Minority apprentices or minorities in applicant pool: | | % |

## E. ADDITIONAL RESOURCE DATA FOR CONSIDERATION IN ESTABLISHING GOALS

| Industry Source Data | Minority rate of participation | Female rate of participation |
|---|---|---|
| E.1 Registered Apprenticeship Partners Information Data System (RAPIDS): * | | |
| E.2 EEOC Occupational Employment Data: ** | | |

* Data available from Registration Agency

** http://www.eeoc.gov/stats/jobpat/jobpat.html

## F. DETERMINATION OF UTILIZATION

| Analysis | Yes | No |
|---|---|---|
| Minority Underutilization: | | |
| Female Underutilization: | | |

## G. SPONSOR'S GOALS:

The program sponsor proposes and agrees to make a good faith effort to attain the goal of selecting _____ % minorities and _____ % women during the next EEO Review cycle. These goals will not be used to discriminate against any qualified applicant on the basis or race, color, religion, national origin or sex.

The number of new apprentices to be hired during the next year (or selection period) is estimated to be: _____

## H. REGISTRATION AGENCY APPROVAL:

| Sponsor | Registration Agency |
|---|---|
| _____ | _____ |
| Sponsor's Signature | Registration Agency Signature |
| _____ | _____ |
| Typed Name | Typed Name |
| _____ | _____ |
| Title | Title |
| _____ | _____ |
| Date Signed | Date Signed |

## Instructions for preparing and completing this worksheet

The purpose of this workforce analysis worksheet is to establish a benchmark against which the demographic composition of the sponsor's apprenticeship program can be compared. The sponsor must separately determine the availability of minorities and women for each occupational title represented by the program. In determining availability, the sponsor must consider, at the very least, the factors identified at 29 CFR 30.4(e) in order to determine whether barriers to equal employment opportunity may exist with a particular occupational title.

Part A The Program Sponsor information section may be prepared by the sponsor representative or servicing Registration Agency Representative.

Part B Occupational information will be taken from the registered program standards, and may be prepared by the sponsor representative or servicing Registration Agency Representative. A Workforce Analysis Worksheet must be completed for each occupational title identified.

Part C Sponsors must use the most current and discrete statistical data available in determining availability estimates for the labor market area specified by the sponsor in Part B. Census data is one example of an appropriate source of statistical information. Other sources include data from local job service offices and data from colleges or other training institutions. Where possible, the Registration Agency has provided examples of appropriate sources of data.

For purposes of this section, the term "labor force" is defined to include both those individuals who are employed and those who are unemployed but looking for employment. The term "working age population" means persons ages 15 years and over whether or not they are currently in the labor force or looking for employment.

Part D The Program Sponsor must provide current workforce data as described in Part D. If the sponsor utilizes either Selection Method §30.5(b) (1) or (2), the data in D-2 will be reflective of the "pool" from which selections will be made. If the sponsor utilizes the Selection Method under §30.5(b) (3) or (4), the data in D-2 will be reflective of the current apprentices registered in the program.

Part E Additional Resource Data for consideration in establishing reasonable goals will be provided by the Registration Agency. This data will provide a snapshot of the national labor force for the given occupation title.

Part F Utilizing the data found in Parts C, D and E, the Program Sponsor is to determine if minorities and/or women are underutilized and must check the appropriate response.

Part G If the Program Sponsor's analysis determines that minorities and/or women are underutilized, the Sponsor, utilizing the resource data found in Parts C, D and E, will establish goals which are reasonable in consideration of the results which could be expected from its good faith efforts to make its overall affirmative action program successful. The Registration Agency will review and access the proposed goals and if found to be reasonable and attainable, will acknowledge receipt of the Sponsors goals for minorities and/or women.

Proposed goals for minorities and/or women that are lower than the current participation rate under the Program Sponsor will not be approved.