

APPENDIX C

Affirmative Action Plan

A written Affirmative Action Plan must be developed detailing the sponsor's commitment to equal opportunity in the recruitment, selection, employment and training of all apprentices.

Representatives of the local Registration Agency should be contacted to assist the JATC in developing its Standards of Apprenticeship using the sample Standards provided. They can also assist in the development of an Affirmative Action Plan. Once developed, these documents must be submitted to the local Registration Agency for approval and registration.

A sample Affirmative Action Plan has been developed for your use and is available for use locally.

SAMPLE

AFFIRMATIVE ACTION PLAN

ADOPTED BY

(INSERT NAME OF LOCAL JATC SPONSORING PROGRAM)

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

**Developed by the International Pipe Trades Joint Training Committee
In Cooperation with
the U.S. Department of Labor, Office of Apprenticeship**

APPROVED BY (NAME OF REGISTRATION AGENCY)

DATE APPROVED: _____

AFFIRMATIVE ACTION PLAN

SECTION I – INTRODUCTION

In order to conform to Title 29, Code of Federal Regulations (CFR) part 30 – Equal Employment Opportunity in Apprenticeship, **(NAME OF LOCAL JATC SPONSOR)**, hereinafter referred to as JATC, hereby adopts the following nondiscriminatory pledge and Affirmative Action Plan (AAP). The JATC enters this AAP with good faith for the purpose of promoting equality of opportunity into its registered apprenticeship program.

This AAP is a supplement to the Apprenticeship Standards. It may be amended at a later date as experience dictates. Any changes made by the JATC shall become part of this written Plan, once approved by the Registration Agency.

SECTION II – EQUAL OPPORTUNITY PLEDGE

In compliance with Section 30.3(b) of Title 29, CFR part 30, as amended May 12, 1978, 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 JATC 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, as amended.”

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 the procedures and methods covered in Section IV. Affirmative Action also includes an analysis of the workforce in the areas in which this AAP operates at the time the AAP is executed. The purpose of the analysis is to determine the minority and women’s labor force in the JATC’s labor market area as provided by **(State Labor Market Analysis Division)**. 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. If underutilization exists, the JATC will **attach goals and timetable** for the selection of minority and/or women (minority and non-minority) applicants into the apprenticeship program. **(See the attached Affirmative Action Plan Workforce Analysis Worksheet.)**

SECTION IV – OUTREACH AND POSITIVE RECRUITMENT

The JATC pledges to engage in various outreach and positive recruitment activities by employing the following approach:

When programs customarily receive applications throughout the year, application information shall be regularly disseminated, but not less than semi-annually. For specific intervals, application information shall be disseminated 30-60 days in advance of the earliest date for each application. The announcement should include the place of application, the minimum qualifications and documentation required and the equal

opportunity policy of the local JATC. **(Local JATC identifies whether they will utilize specific interval or year-round opening and whom announcement will be disseminated to):**

- Office of Apprenticeship and/or State Apprenticeship Agency
- Minority Organizations
- Women's Organizations
- Job Corps Center
- Local School Districts
- One Stop Centers
- Vocational Education Schools
- Veterans Organizations

The JATC will also undertake positive recruitment activities **(the following are samples; local JATC must identify which activities they will undertake):**

- Participate in high school career days and job fairs that are sponsored by local school districts, Job Service Centers, and any other community based organizations.
- Internally communicate the sponsor's equal opportunity policy in order to foster understanding, acceptance, and support among supervisors and employees in order to aid the JATC in meeting its positive recruitment obligations.
- Engage in outreach with women and minority organizations for the positive recruitment and preparation of potential applicants.
- Utilize journeyworkers to assist in the implementation of sponsor's affirmative action program.
- Cooperate and counsel with secondary and vocational school administrators concerning needs of the industry and how transition of women and minority students from school to the pipe trades apprenticeship can best be accomplished.
- Attempt to secure public service time on radio and/or TV station(s) commonly identified with the minority/female community.
- Sponsor informational activities with area guidance counselors, identifying requirements for entrance into apprenticeship and successful completion of apprenticeship.
- Post public announcements of the Apprenticeship Opportunity in commercial establishments and public facilities normally frequented by minorities and/or women.
- Adopt other outreach activities deemed necessary to accomplish the goals **(Local JATC must identify)**.

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. Said review shall analyze the affirmative action steps taken by the JATC—evaluating for positive impact, as well as, adverse impact in the areas of outreach, selection and retention. The JATC will work diligently to identify the cause and effect that result from their affirmative action measures. The JATC will continually monitor recruitment, selection, and attrition as it tries to identify the need for new affirmative action efforts and/or deletion of ineffective existing activity. All changes to the JATC’s AAP must be submitted to the Registration Agency for approval before implementation.

SECTION VI – ADOPTION OF AFFIRMATIVE ACTION PLAN

The JATC hereby adopts this Affirmative Action Plan. This AAP shall remain in effect until it is updated by the JATC based on the need to modify or revise the AAP to insure greater success in the recruitment, selection and retention of minorities and women.

Signature - JATC Chairman

Date

Signature - JATC Secretary

Date

REGISTERED WITH AND APPROVED BY:

Signature - Registration Agency

Date

Title

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 of 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.