



# EEO in Apprenticeship Compliance Timetable

<b>EXISTING Sponsors – Initial Obligations*</b>	<b>NEW Sponsors – Initial Obligations*</b>
<p><b>On Effective Date (January 18, 2017)</b></p> <p>All obligations in rule not specifically listed below take effect (e.g., selection procedures (§ 30.10), recordkeeping (§ 30.12), compliance review/complaint procedures (§§ 30.13-14), sanctions (§ 30.15), intimidation/retaliation protections (§ 30.17))</p>	<p><b>Upon Registration (or Effective Date, whichever is later)</b></p> <p>All obligations in rule not specifically listed below take effect (e.g., selection procedures (§ 30.10), recordkeeping (§ 30.12), compliance review/complaint procedures (§§ 30.13-14), sanctions (§ 30.15), intimidation/retaliation protections (§ 30.17))</p>
<p><b>180 Days post-Effective Date</b></p> <p>Non-discrimination / general affirmative action obligations in § 30.3</p> <ul style="list-style-type: none"> <li>• Refrain from discrimination, including new protected bases</li> <li>• Update and disseminate EO pledge</li> <li>• Begin universal outreach efforts</li> <li>• Implement anti-harassment measures</li> </ul>	<p><b>Upon Registration (or 180 days post-Effective Date, whichever is later)</b></p> <p>Non-discrimination / general affirmative action obligations in § 30.3</p> <ul style="list-style-type: none"> <li>• Refrain from discrimination, including new protected bases</li> <li>• Update and disseminate EO pledge</li> <li>• Begin universal outreach efforts</li> <li>• Implement anti-harassment measures</li> </ul>
<p><b>2 Years post-Effective Date</b></p> <ul style="list-style-type: none"> <li>• By 2 year mark, disseminate one-time invitation to self-identify (ID) for all current apprentices, begin self-ID at pre and post stage (§ 30.11)</li> <li>• Begin invitations to self-ID at pre-offer and post-offer stage (§ 30.11)</li> <li>• Conduct initial workforce analysis for race/sex (§ 30.5(b)) and individuals with disabilities (§ 30.7(d)(2))</li> <li>• Conduct initial review of personnel processes (§ 30.9)</li> <li>• Draft written AAP (§ 30.4(e))</li> </ul>	<p><b>2 Years post-Registration</b></p> <ul style="list-style-type: none"> <li>• By 2 year mark, disseminate one-time invitation to self-ID for all current apprentices, begin self-ID at pre and post stage (§ 30.11)</li> <li>• Begin invitations to self-ID at pre-offer and post-offer stage (§ 30.11)</li> <li>• Conduct initial workforce analysis for race/sex (§ 30.5(b)) and IWD (§ 30.7(d)(2))</li> <li>• Conduct initial review of personnel processes (§ 30.9)</li> <li>• Draft written AAP (§ 30.4(e))</li> </ul>
<p><b>At First Compliance Review After Effective Date (whenever that occurs)</b></p> <ul style="list-style-type: none"> <li>• Conduct utilization analysis for race/sex (w/ RA assistance) (§ 30.5(c))</li> <li>• If data shows underutilization for sex, minority group, or IWDs, set utilization goal (§§ 30.6, 30.7)</li> </ul>	<p><b>At First Compliance Review After Effective Date (whenever that occurs)</b></p> <ul style="list-style-type: none"> <li>• Conduct utilization analysis for race/sex (w/ RA assistance) (§ 30.5(c))</li> <li>• If data shows underutilization for sex, minority group, or IWDs, set utilization goal (§§ 30.6, 30.7)</li> </ul>
<p><b>Upon Finding of Underutilization and Utilization Goal Being Set</b></p> <ul style="list-style-type: none"> <li>• For IWD, determine whether impediments to EEO exist (considering outreach/recruitment and review of personnel processes); if so, undertake action-oriented programs in § 30.8</li> <li>• For race/sex, undertake action-oriented programs in § 30.8</li> </ul>	<p><b>Upon Finding of Underutilization and Utilization Goal Being Set</b></p> <ul style="list-style-type: none"> <li>• For IWD, determine whether impediments to EEO exist (considering outreach/recruitment and review of personnel processes); if so, undertake action-oriented programs in § 30.8</li> <li>• For race/sex, undertake action-oriented programs in § 30.8</li> </ul>

\* These deadlines also apply to sponsors in SAA states, with the prerequisite that the state has enacted language adopting the updated part 30 regulation, per § 30.18.

## Schedule of Recurring Obligations

### **Update List of Recruitment Sources (§ 30(b)(3)(i)):**

- Annually

### **Update Written AAP (§ 30.4(e))**

- Each time workforce analysis is done (at compliance review, and then again in 3 years if no intervening compliance review)

### **Conduct Workforce Analysis (race/sex/ethnicity) (§ 30.5(b)):**

- At each compliance review, and again if 3 years have passed since last workforce analysis without a compliance review

### **Conduct Availability Analysis (race/sex/ethnicity) (§ 30.5(c)):**

- At each compliance review

### **Establish Utilization Goals (race/sex/ethnicity) (§ 30.6(a)):**

- At each compliance review (if underutilized)

### **Conduct Workforce Analysis (disability) (§ 30.7(d)(2)):**

- At each compliance review, and again if 3 years have passed since last workforce analysis without a compliance review

### **Action oriented efforts (§ 30.8):**

- Race/sex/ethnicity: Only undertaken if goal is set at compliance review
- Disability: Only undertaken if underutilization determined and impediments to EEO are determined to exist

### **Review of personnel processes (§ 30.9):**

- Annually

### **Invitation to self-identify as individual with a disability (§ 30.11):**

- Pre-offer: When individual applies or is considered for apprenticeship
- Post-offer: After acceptance into program, but before apprenticeship begins
- Reminder to apprentices in program that they can update self-ID: Annually.