



Appendix C

AFFIRMATIVE ACTION PLAN

ADOPTED BY

_____ (Sponsor)

AS REQUIRED UNDER TITLE 29, CODE OF FEDERAL REGULATIONS, PART 30 and RIGL 28-45

SECTION I - INTRODUCTION

The sponsor enters this affirmative action plan (AAP) in good faith to promote equality of opportunity in its registered apprenticeship program. If women and/or minorities are underutilized in the apprenticeship program, the sponsor seeks to increase the recruitment of qualified women and/or minorities for possible selection into the apprenticeship program. The sponsor hereby adopts the equal opportunity pledge located in Section II and the AAP.

This AAP is a supplement to the apprenticeship standards. Any changes made by the sponsor to the AAP will become part of this written AAP, once approved by the Registration Agency.

SECTION II - EQUAL OPPORTUNITY PLEDGE

The sponsor 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, sex, sexual orientation, gender identity or expression, age, national origin, or disability. The programs shall be conducted to encourage the fullest development of the interests, aptitudes, skills, and capacities of all participants. The sponsor will take affirmative action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required under 29 CFR § 30 and RIGL Title 28. (See 29 CFR §§ 29.5(b)(21); 30.3(b); RIGL 28-5.1-8).

SECTION III - ANALYSES AND GOALS

To ensure full utilization of minorities and women in the apprenticeship program, the sponsor will conduct analyses to determine whether minorities and/or females are being underutilized and, if they are, will establish appropriate goals for the full utilization of minorities and/or women in apprenticeship. To determine whether underutilization exists, the sponsor will analyze at least the following five factors:

- (1) The size of the working age minority and female (minority and nonminority) population in the program sponsor's labor market area;
- (2) The size of the minority and female (minority and nonminority) labor force in the program sponsor's labor market area;

- (3) The percentage of minority and female (minority and nonminority) participation as apprentices in the particular occupation as compared with the percentage of minorities and women (minority and nonminority) in the labor force in the program sponsor's labor market area;
- (4) The percentage of minority and female (minority and nonminority) participation as journeyworkers employed by the employer or employers participating in the program as compared with the percentage of minorities and women (minority and nonminority) in the sponsor's labor market area and the extent to which the sponsor should be expected to correct any deficiencies through the achievement of goals for the selection of apprentices; and
- (5) The general availability of minorities and women (minority and nonminority) with present or potential capacity for apprenticeship in the program sponsor's labor market area.

Underutilization exists if there are fewer minorities and/or women in the registered occupation(s) in the sponsor's apprenticeship program than would reasonably be expected in view of all relevant factors. If the sponsor detects underutilization of minorities and/or women in its apprenticeship program in the registered occupation(s), it will establish goals for the selection of minority and/or female applicants. (For further instructions, see the attached affirmative action plan workforce analysis worksheet.) The sponsor will make good-faith efforts to meet its goals.

SECTION IV - OUTREACH AND POSITIVE RECRUITMENT- 29 CFR § 30.4(c)

The sponsor will undertake appropriate outreach and positive recruitment efforts that would reasonably be expected to increase minorities' and women's participation in apprenticeship by expanding the opportunities of minorities and women to become eligible for apprenticeship selection. The sponsor will set forth the specific steps it intends to take under each selected effort below. The sponsor will undertake a significant number of activities to enable it to meet its obligations under 29 CFR § 30.4(c).

- A. The sponsor will disseminate information concerning the nature of the apprenticeship, requirements for admission to apprenticeship, availability of apprenticeship opportunities, sources of apprenticeship applications, and its equal opportunity policy to the following:
 - DLT Business Workforce Center
(T: 1-888-616-5627 E: DLT.esu@dlt.ri.gov Web: <http://www.dlt.ri.gov/bwc/>)
 - Register your business in EmployRI and post your job openings
(instruction at <http://www.dlt.ri.gov/bwc/how2reg.htm>)
 - Other outreach programs and community organizations, including those that can effectively reach minorities and women
 - Career and Technical High School programs that align with your program
 - Media outlets which may include community newspapers or social media (Facebook, Twitter, Instagram, LinkedIn, etc.)
 1. Sponsors of programs accepting applications only at specified intervals must disseminate the above information at least 30 days in advance of the earliest date for application at each interval.
 2. Sponsors of programs customarily receiving applications throughout the year must disseminate the above information regularly, not less than semiannually.
- B. The sponsor will participate 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. The sponsor will cooperate with local 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. The sponsor will communicate its equal opportunity policy internally in such a manner as to foster understanding, acceptance, and support of the policy among the sponsor's various officers, supervisors, employees, and members and to encourage such persons to take the necessary action to aid in meeting its obligation under 29 CFR § 30.
- E. The sponsor will engage 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 pretesting experience and training. In initiating and conducting these programs, the sponsor may be required to work with other sponsors and appropriate community organizations. The sponsor will also initiate programs to prepare women and encourage women to enter traditionally male programs.
- F. The sponsor will encourage the establishment and utilization of programs of pre-apprenticeship, preparatory occupational training, or others designed to afford related work experience or prepare candidates for apprenticeship. The sponsor 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. The sponsor will utilize journeyworkers to assist in the implementation of its AAP.
- H. The sponsor will grant advance standing or credit based on previously acquired experience, training, skills, or aptitude for all applicants equally.
- I. The sponsor will take 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, sex, sexual orientation, gender identity or expression, age, national origin, or disability. (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; periodic auditing of AAPs and activities; and development of reasonable procedures to ensure equal employment opportunity, including reporting systems, on-site reviews, and briefing sessions).

For each item checked in Section IV, describe in detail each specific step that the sponsor will undertake to fulfill that outreach and recruitment step:

SECTION V - ANNUAL REVIEW OF AFFIRMATIVE ACTION PLAN

The sponsor will make an annual review of its current AAP and its overall effectiveness and will institute any revisions or modifications warranted. The review will analyze the affirmative action steps (independently and collectively) taken by the sponsor to evaluate their effectiveness in ensuring equal opportunity in all aspects of apprenticeship, including recruitment, selection, employment, and training. The sponsor will continually monitor these processes in order to identify and address any barriers to equal opportunity. This may require that the sponsor identify the need for new affirmative action efforts and/or

deletion of ineffective existing activities. All changes to the AAP must be submitted to the Registration Agency for approval.

SECTION VI - OFFICIAL ADOPTION

The Sponsor, _____, hereby officially adopt this Affirmative Action Plan on this _____ day of _____ / _____ (Month/Year).

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

Signature

Printed Name

AFFIRMATIVE ACTION PLAN WORKFORCE ANALYSIS WORKSHEET

A. SPONSOR INFORMATION

Program Number:	(will be assigned at registration)
Name of Sponsor:	
Address:	
City/State/Zip Code:	
Contact Person:	
Phone Number:	
E-Mail Address:	

B. OCCUPATIONAL INFORMATION

Occupation Title:	
Occupation Codes: RAPIDS:	O*NET-SOC:
Type of Selection Method Used	<input type="checkbox"/> Selection on basis of rank from pool of eligible applicants <input type="checkbox"/> Random selection from pool of eligible applicants <input type="checkbox"/> Selection from pool of current employees <input type="checkbox"/> Alternative selection
Labor Market Area Description:	<input checked="" type="checkbox"/> State <input type="checkbox"/> SMA

C. LABOR MARKET AREA AND OCCUPATIONAL PARTICIPATION DATA

C.1. Total Labor Force in Labor Market Area	551,014	
Source: RI LMI, 2010 Census Labor Force (www.dlt.ri.gov/lmi/census/wf/aa1.htm)		
Number of women:	275,693	50% of labor force
Number of minorities:	112,326	20% of labor force
C.2. Working Age Population in Labor Market Area	688,290	Source: ACS (2010-2014)
Number of women:	350,850	51% of pop. age 18-65
Number of minorities:	165,598	24% of pop. age 18-65
C.3. Apprentice Participation in Occupation in National Apprenticeship System***		
Number of women:		% of apprentices
Number of minorities:		% of apprentices
C.4. General Availability of Minorities and Women with the Present or Potential Capacity for Apprenticeship in relevant Labor Market Area ***		
Number of women:		
Number of minorities:		

D. SPONSOR'S WORKFORCE DATA

D.1. Total Number of Journeyworkers Employed		
Number of women:		% of work force
Number of minorities:		% of work force
D.2. Total Percentage of Apprentices or of Applicant Pool		
Percentage of women apprentices or women in applicant pool:		%
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. EEO Occupational Employment Data*** INSERT OCCUPATION, RI EEO Tabulation from 2006-2010 ACS.	%	%

F. DETERMINATION OF UTILIZATION (Yes or No)

Minority underutilization:	YES/NO
Female underutilization:	YES/NO

G. SPONSOR'S GOALS

The program sponsor proposes and agrees to make a good-faith effort to attain the goal of selecting 30% minorities during the next EEO review cycle. This goal comes from the targets set in the USDOL American Apprenticeship Initiative grant funding these efforts. These goals will not be used to discriminate against any qualified applicant based on race, color, religion, national origin, or sex.

The number of new apprentices to be hired during the next year is estimated to be _____.

H. REGISTRATION AGENCY APPROVAL

Sponsor

Registration Agency, RI Office of Apprenticeship

Sponsor's Signature

Registration Agency Signature

Typed Name

Richard Palmiere

Title

Supervisor of Apprenticeship

Date Signed

Date Signed

***For assistance with Labor Market Information please contact Apprenticeship Rhode Island.

Instructions for 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 within a particular occupational title.

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

Part B Occupational information must 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 The sponsor must use the most current and discrete statistical data available in determining availability estimates for the labor market area specified 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 and other training institutions. Where possible, the Registration Agency has provided examples of appropriate sources of data.

For the purpose 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 16 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 29 CFR § 30.5(b)(1) or (2), the data in D.2 must reflect the pool of eligible applicants from which selections are made. If the sponsor utilizes either selection method 29 CFR § 30.5(b)(3) or (4), the data in D.2 must reflect the apprentices currently registered in the program.

Part E Additional resource data for consideration in establishing reasonable goals will be provided by the Registration Agency. These 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 sponsor will determine and record whether minorities and/or women are underutilized.

Part G If the sponsor's analyses determine that minorities and/or women are underutilized, the sponsor, utilizing the resource data found in Parts C, D, and E, will establish goals that are reasonable in consideration of the results that could be expected from its good-faith efforts to make its overall affirmative action program successful. The Registration Agency will assess the proposed goals for minorities and/or women and, if they are found to be reasonable and attainable, will approve the sponsor's goals. The Registration Agency will not approve proposed goals for minorities and/or women that are lower than the current participation rates in the program.



Appendix D

QUALIFICATIONS AND SELECTION PROCEDURES

ADOPTED BY

_____ (Sponsor)

SECTION I - MINIMUM QUALIFICATIONS

Minimum qualifications are detailed in Section IV of these standards.

SECTION II - APPLICATION PROCEDURES (EXAMPLES)

- A. Applicants will be accepted **throughout the year or as specified**. Every person requesting an application will have one made available upon signing the applicant log. Applicants will be asked to self-identify race, ethnicity, and sex in the log book for the purposes of monitoring affirmative action efforts.
- B. All applications will be identical in form and requirements. The application form will be numbered in sequence corresponding with the number appearing on the applicant log so that all applications can be accounted for. These requirements can also be met with an online application system.
- C. Each applicant will be required to review the Apprenticeship Standards and will be provided information about the program. If the applicant has any additional questions on the qualifications or needs additional information to complete the application, it will be provided by the sponsor.
- D. Receipt of the properly completed application form along with required supporting documents (identification, birth certificate, or other acceptable proof of age; acceptable documentation of education) will constitute the completed application.
- E. Completed applications will be checked for minimum qualifications. Applicants deficient in one or more qualifications or requirements or making false statements on their applications will be notified in writing of their disqualification and of the appeal rights available to them. No further processing of such applications will be taken.
- F. Applicants meeting the minimum qualifications and submitting the required documents will be notified as subsequent steps in the selection process.

SECTION III - SELECTION PROCEDURES (EXAMPLES)

Sponsor must select one (1) of the following:

1. ***Alternative selection methods***

The sponsor may select apprentices by any other method, including its present selection method, provided that the sponsor meets the requirements listed in 29 CFR § 30.5(b)(4).

2. ***Selection on basis of rank from pool of eligible applicants***

The sponsor may select apprentices from a pool of eligible applicants on the basis of the rank order of their scores on one or more qualification standards where there is a significant statistical relationship between rank order of scores and performance in the apprenticeship program. The selection of any qualification standards beyond minimum legal working age, the use of oral interviews, the notification of applicants, and the establishment of goals for the admission of minorities and women (minority and nonminority) into the pool of eligibles must proceed in accordance with the requirements of 29 CFR § 30.5(b)(1).

3. ***Random selection from pool of eligible applicants***

The sponsor may select apprentices from a pool of eligible applicants on a random basis. The method of random selection is subject to approval by the U.S. Department of Labor. Supervision of the random selection process shall be by an impartial person or persons selected by the sponsor but not associated with the administration of the apprenticeship program. The time and place of the selection, and the number of apprentices to be selected, shall be announced. The place of the selection shall be open to all applicants and the public. The names of apprentices drawn by this method shall be posted immediately following the selection at the program sponsor's place of business.

4. ***Selection from pool of current employees***

The sponsor may select apprentices from an eligibility pool of the workers already employed by the program sponsor or by the sponsor's established promotion policy. The sponsor adopting this method of selecting apprentices shall establish goals for the selection of minority and female apprentices, unless the sponsor concludes, in accordance with the provisions of 29 CFR §§ 30.4(d), (e), and (f) that it does not have deficiencies in terms of underutilization of minorities and/or women (minority and nonminority) in the apprenticeship of journeyworker occupations represented by the program.

SECTION IV - DIRECT ENTRY

Sponsors that wish to invoke the direct entry provision may do so without regard to the existing selection procedure or minimum qualifications used for entry into the apprenticeship program. Individuals selected into the apprenticeship program via direct entry shall include only those individuals described below who have received training or employment in an occupation directly or indirectly related to the occupation(s)

registered in these standards. The sponsor will award credit for previous experience in accordance with Section XII of these standards and will pay each apprentice at the wage rate commensurate with his or her skill attainment. The credit for previous experience shall be awarded without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. The methods for direct entry are as follows:

Sponsor must select the one's they will use

- A. A youth who has completed a Job Corps training program in any occupation covered in these standards and who meets the minimum qualifications of the apprenticeship program may be admitted directly into the program, or if no apprentice opening is available, the Job Corps graduate may be placed at the top of the current applicant ranking list and given first opportunity for placement. The sponsor will evaluate the Job Corps training received to grant appropriate credit on the term of apprenticeship. Entry of Job Corps graduates will be done without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. ***(Note: This is a method of direct entry into the apprenticeship program.)***
- B. A youth who has completed a YouthBuild training program in any occupation covered in these standards and who meets the minimum qualifications of the apprenticeship program may be admitted directly into the program, or if no apprentice opening is available, the YouthBuild graduate may be placed at the top of the current applicant ranking list and given first opportunity for placement. The sponsor will evaluate the YouthBuild training received to grant appropriate credit on the term of apprenticeship. Entry of YouthBuild graduates will be done without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. ***(Note: This is a method of direct entry into the apprenticeship program.)***
- C. A military veteran who is registered with the Helmets to Hardhats program or has completed military technical training school and/or participated in a registered apprenticeship program or related occupation while in the military may be given direct entry into the apprenticeship program. The sponsor shall evaluate the military training received for granting appropriate credit on the term of apprenticeship and the appropriate wage rate. The sponsor will determine what training requirements the veteran needs to meet to ensure he or she receives all necessary training for completion of the apprenticeship program. Applicants must submit a DD-214 to verify military training and/or experience if they are a veteran and wish to receive consideration for such training/experience. Entry of military veterans shall be done without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. ***(Note: This is a method of direct entry into the apprenticeship program.)***
- D. A former inmate of the U.S. Department of Justice Bureau of Prisons (BOP) who has participated in or successfully completed a specific BOP apprenticeship program may be given direct entry into the apprenticeship program. Sponsors agreeing to admit such individuals into apprenticeship must do so without regard to present minimum qualifications, eligibility lists, or scores on written apprenticeship entrance tests. Entry into

the program by this method shall be done without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. ***(Note: This is a method of direct entry into the apprenticeship program.)***

- E. A senior citizen who has completed a Senior Community Service Employment Program (SCSEP) pre-apprenticeship training program in any health care occupation covered in these standards and who meets the minimum qualifications of the apprenticeship program may be admitted directly into the program, or if no apprentice opening is available, the SCSEP graduate may be placed at the top of the current applicant ranking list and given first opportunity for placement. The sponsor will evaluate the SCSEP training received to grant appropriate credit on the term of apprenticeship. Entry of SCSEP graduates will be done without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. ***(Note: This is a method of direct entry into the apprenticeship program for the health care industry.)***
- F. An individual who has completed a structured pre-apprenticeship training program that meets the requirements outlined in Training and Employment Notice 13-12, Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources, in any occupational area covered in these standards of apprenticeship and who meets the minimum qualifications of the apprenticeship program may be admitted directly into the program. The candidate shall provide official documentation confirming that he or she fulfilled the specific requirements of the pre-apprenticeship program, such as completion/graduation certificates, transcripts, notarized letters of confirmation, and sworn statements. The sponsor will evaluate the training received to grant appropriate credit on the term of apprenticeship. Entry of pre-apprenticeship candidates shall be done without discrimination because of race, color, religion, sex, sexual orientation, gender identity or expression, age, national origin, or disability. ***(Note: This is a method of direct entry into the apprenticeship program.)***

SECTION V - COMPLAINT PROCEDURE

- A. Any apprentice or applicant for apprenticeship who believes that he/she has been discriminated against on the basis of race, color, religion, national origin, or sex with regard to apprenticeship or that the equal opportunity standards with respect to his/her selection have not been followed in the operation of an apprenticeship program may, personally or through an authorized representative, file a complaint with the Registration Agency or, at the apprentice or applicant's election, with the private review body established by the sponsor (if applicable).
- B. The complaint will be in writing and will be signed by the complainant. It must include the name, address, and telephone number of the person allegedly discriminated against, the sponsor involved, and a brief description of the circumstances of the failure to apply equal opportunity standards.
- C. The complaint must be filed not later than 180 days from the date of the alleged discrimination or specified failure to follow the equal opportunity standards. In the case of a complaint filed directly with the review body designated by the sponsor to review such complaints, any referral

of such complaint by the complainant to the Registration Agency must occur within the time limitation stated above or 30 days from the final decision of such review body, whichever is later. The time may be extended by the Registration Agency for good cause shown.

- D. Complaints of discrimination and failure to follow equal opportunity standards in the apprenticeship program may be filed and processed under 29 CFR § 30 and the procedures as set forth above.
- E. The sponsor will provide written notice of its complaint procedure to all applicants for apprenticeship and all apprentices.

SECTION VI - MAINTENANCE OF APPLICATION AND SELECTION RECORDS

The sponsor will keep adequate records, including a summary of the qualifications of each applicant; the basis for evaluation and for selection or rejection of each applicant; the records pertaining to interviews of applicants; the original application for each applicant; information

relative to the operation of the apprenticeship program, including, but not limited to, job assignment, promotion, demotion, layoff, or termination; rates of pay or other forms of compensation or conditions of work; hours including hours of work and, separately, hours of training provided; and any other records pertinent to a determination of compliance with 29 CFR § 30, as may be required by the U.S. Department of Labor. The records pertaining to individual applicants, selected or rejected, will be maintained in such manner as to permit the identification of minority and women (minority and nonminority) participants.

Each sponsor must retain a statement of its affirmative action plan for the prompt achievement of full and equal opportunity in apprenticeship, including all data and analyses made pursuant to the requirements of 29 CFR § 30.4. Each sponsor also must maintain evidence that its qualification standards have been validated in accordance with the requirements set forth in 29 CFR § 30.5(b).

If applicants are interviewed during the selection process, adequate records include a brief summary of each interview and the conclusions on each of the specific factors - e.g., motivation, ambition, and willingness to accept direction - that are part of the total judgment.

Records will be maintained for 5 years from the date of last action and made available upon request to the U.S. Department of Labor or other authorized representative.

SECTION VII - OFFICIAL ADOPTION OF SELECTION PROCEDURES

The Sponsor, _____ hereby officially adopts these selection procedures on this _____ day of _____ / _____ (Month/Year).

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

Signature of Sponsor (*designee*)

Printed Name