

Affirmative Action Plans

Information for RI Registered Apprenticeship Program Sponsors

U.S. Department of Labor Equal Employment Opportunity regulations require Registered Apprenticeship Program (RAP) sponsors to develop an Affirmative Action Plan when the program has more than five apprentices. An Affirmative Action Plan (AAP) is a written document that outlines the steps a sponsor will take to ensure equal opportunity and prevent discrimination in a RAP. This guide provides information on how to successfully comply with U.S. DOL Equal Employment Opportunity regulations and achieve great results.



When is an Affirmative Action Plan (AAP) required?

AAP's are required when a RAP sponsor does not already have an approved Equal Employment Opportunity (EEO) program and the RAP has **five or more apprentices**. Plans are incorporated as Appendix C to the program standards. Sponsors do not submit the AAP to RIDLT but must have it available upon request.

What is the purpose of Affirmative Action Plans?

AAP's assists sponsors in detecting, diagnosing, and correcting any barriers to equal opportunity that may exist in the RAP. An Affirmative Action Plan is designed to ensure equal opportunity and prevent discrimination in apprenticeship programs. Affirmative Action Plans do **not** impose quotas or mandate hiring unqualified people.

Inside this guide, how to:

- Gather Data
- Conduct Demographic Analysis
- Set Utilization Goals (if necessary)
- Implement a Targeted Outreach Plan (if necessary)
- Review Personnel Policies

Building Futures' Apprenticeship Rhode Island initiative is a partnership with RI Department of Labor and Training (RIDLT) to maximize the use of quality Registered Apprenticeships.

Registered Apprenticeship is a proven strategy for employers to recruit, train, and retain a skilled workforce and for Rhode Islanders to launch family-sustaining careers. We provide no-cost technical assistance to design, register, and implement Registered Apprenticeship Programs in new industries and occupations.

Visit www.bfri.org/ari-EEO to access the other guides in this series.

Steps to design and implement an Affirmative Action Plan (AAP) for your RAP

The Affirmative Action Plan is Appendix C of the RI Registered Apprenticeship Program Standards. Sponsors required to complete Appendix C and implement an AAP must do so within two years of the RAP registration date – or two years from the date the RAP registers its fifth apprentice – whichever is later. Apprenticeship Rhode Island staff are available to help sponsors in this process.

STEP 1

Gather Data

- Encourage, but do not require, apprentices to identify their race, sex, and ethnicity on the Apprenticeship Agreement.
- Provide the [Voluntary Disability Disclosure Form](#) to the apprentice at the same time, allowing an apprentice to disclose disability status, should they choose to.

Gathering data on apprentices with disabilities

As part of completing the Apprenticeship Agreement, sponsors may collect racial, sex, and ethnicity data about an apprentice using internal organization forms but are required to provide apprentices with the [Voluntary Disability Disclosure Form](#). Refer to U.S. DOL's [Disability Self-Identification: A Guide for Apprenticeship Sponsors](#) for more information.

STEP 2

Conduct Demographic Analysis

- Sponsor completes a *Workforce Analysis* of its current apprentice workforce.
- RAPIDS, the Registered Apprenticeship Partners Information Database System, can calculate the Workforce Analysis for sponsors after apprentices are registered.

Three analyses make up the Affirmative Action Plan. The sponsor is responsible for the Workforce Analysis. RIDLT and/or Apprenticeship RI staff complete the other two analyses in partnership with the RAP sponsor.



Workforce Analysis

Sponsors identify the racial, sex, and ethnicity demographics of the RAP's apprentice workforce by occupational title and major occupation group.



Availability Analysis

Apprenticeship RI or DLT staff use Labor Market Information determines the racial, gender, and ethnic representation of qualified individuals available for apprenticeship in the local recruitment area.



Utilization Analysis

Apprenticeship RI and/or RIDLT staff compare the Workforce and Availability analyses to determine if the RAP workforce represents the demographics of the local recruitment area.

Goals for Individuals with disabilities

U.S. DOL has set a utilization goal of 7% for individuals with disabilities in all Registered Apprenticeship programs. Apprenticeship RI and RIDLT use the goal of 7% to measure the representation of individuals with disabilities in the sponsor's apprentice workforce by major occupation group.

Accessing Technical Assistance

Sponsors have technical assistance available to complete Affirmative Action Plans.

Contact Apprenticeship RI at Building Futures, 401-919-5919 or info@bfri.org.



Data & Analysis Steps Summary



Sponsors complete the Workforce Analysis by reviewing demographic information of apprentices, collected in the Apprenticeship Agreement. After apprentices are registered in RAPIDS, RAPIDS can automatically create this analysis.



Apprenticeship RI and/or RIDLT staff complete the Availability Analysis using Labor Market Information statistics to determine RI workforce demographics in your specific occupations and industry.



Apprenticeship RI and/or RIDLT complete the Utilization Analysis by comparing the Workforce Analysis to the Availability Analysis. If the apprentice workforce demographics are significantly different than what would be expected given availability in the local recruitment area, goals are set.

STEP 3

Set Utilization Goals

- Apprenticeship RI and/or RIDLT staff assist in setting Utilization Goals if necessary. Utilization goals are if there are significantly fewer women, ethnic, or racial minorities in a program than would be reasonably expected based on the demographics of the RAP recruitment area.

Utilization Goals are targets by which to measure the effectiveness of the RAP recruitment efforts.

Utilization Goals are not:

- Admission or evidence of discrimination.
- Quotas - quotas are not allowed in RAPs.
- Justification to prefer an applicant on the basis of race, sex, ethnicity or disability.
- Mandates to hire anyone except qualified individuals.

STEP 4

Implement A Targeted Outreach Plan

- If necessary (i.e., utilization goals have been established), the Sponsor must document its targeted outreach plan, in addition to the universal outreach RA sponsors conduct and document.

Rhode Island has a vibrant network of workforce programs and community-based organizations that work with women, Rhode Island's diverse ethnic and racial minority communities, and people with disabilities. Partnerships with these organizations can ensure that recruitment efforts reach demographic communities identified in Utilization Goals.

For more information on adopting a Universal Outreach Plan to meet your RAP's needs visit www.bfri.org/ari-EEO.

STEP 5

Review Personnel Practices

- By the two-year anniversary of having five or more apprentices, Sponsors will review RAP personnel practices with Apprenticeship RI and/or RIDLT staff.
- Sponsors will review personnel practices related to the RAP annually thereafter and document any program modifications resulting from the review.

Personnel policy review includes apprentice qualifications, application and selection procedures, wages, recruitment activities, job performance, advancement and promotions, work assignments, disciplinary actions, handling of requests for reasonable accommodations, and accessibility to individuals with disabilities.

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