



Apprenticeship EEO Monitoring

7/19/16

Apprenticeship EEO Monitoring

- Sponsors with an Affirmative Action Plan (AT603) will receive a letter showing their current demographic data as compared to the local labor market
- Sponsors with an Affirmative Action Pledge (AT602) will continue to have their EEO efforts reviewed on a regular basis as part of program monitoring

One of the goals of a quality apprenticeship program is ensuring diversity among apprentices. We are beginning review and evaluate the diversity in programs.

Reviews have been conducted comparing the demographic data for programs to the local labor market data for the area where sponsors recruit.

A letter will be sent out to inform sponsors who use an AT603 form (those with 5 or more apprentices) of their current demographic data.

The data reflects the information sponsors reported for their current active apprentices (from Apprenticeship Agreements – AT401 forms) and their journeyworkers (from Affirmative Action Plan – AT603 form).

For sponsors using an AT602 (those with less than 5 apprentices), the EEO monitoring will continue to be a part of regular monitoring visits.

What Does the Letter Look Like?

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<DATE>

Contact Name
 Contact Title
 Sponsor Name
 Address
 City, State, Zip

Sponsor Code/ATP Code

Dear < >:

We have recently reviewed the demographic data for your < > program and compared it to the local labor market data for the area where you recruit. The data shown below reflects the information you have reported for your current active apprentices (from Apprenticeship Agreements – AT401 forms) and your journeyworkers (from your Affirmative Action Plan – AT603 form).

| Minorities | | Women | |
|------------|--|-------|---|
| A | Number of minority apprentices in your program | < > | Number of women apprentices in your program |
| B | Number of minority journeyworkers | < > | Number of women journeyworkers |
| C | Percentage of minorities in the labor market where you recruit | < > % | Statewide standard for women in apprenticeship |
| D | Percentage of minority apprentices in your program | < > % | Percentage of women apprentices in your program |
| E | EEO Performance – Minority (apprentices only) | < > % | EEO Performance – Women (apprentices only) |
| F | Percentage of minority apprentices and journeyworkers | < > % | Percentage of women apprentices and journeyworkers |
| G | EEO Performance – Minority (apprentices and journeyworkers) | < > % | EEO Performance – Women (apprentices and journeyworkers) |

Your program has a status of **Satisfactory** if either Line E or Line G is at or above 80% (for both minorities and women).

Your program has a status of **Unsatisfactory** if both Line E and Line G are below 80% (for either minorities or women).

This is an example of the letter that sponsors will receive if they have an Affirmative Action Plan (AT603).

Page 1 of the letter provides a comparison of the demographics in a program and the local labor market.

What Does the Letter Look Like?

If your program has a status of unsatisfactory, you may consider doing one or more of the following:

- **Increase your outreach** – make changes to where your recruitments are publicized in order to reach target populations. Examples of publications and/or Community Based Organizations (CBOs) that you may wish to use include: local community newspapers, minority churches and radio stations, and other organizations. Some CBOs may also provide support services such as child care and transportation. Strategies you can use to reach and recruit women include using females on advertisements, or bringing a female to job fairs to share an apprenticeship experience.
- **Change your recruitment type** – review the type of recruitment you are using to determine if it is maximizing the candidate pool. The different types of recruitments include: area-wide (periodic and continuous); local; limited to current employees; and online. Your Apprentice Training Representative (ATR) can assist you to make changes to your recruitment method.
- **Utilize Direct Entry** – Direct Entry is an alternative method of enrolling apprentices allowing you to reach underrepresented populations which may help you meet your EEO goals. Additional information, as well as a list of approved Direct Entry Providers, can be found at the following link to our website: <http://www.labor.state.ny.us/apprenticeship/direct-entry.shtml>.
- **Revise minimum qualifications/selection criteria** – consider whether the minimum qualifications and/or selection criteria for apprentices should be revised to improve alignment with the requirements of the training program, allowing you to reach better qualified candidates.

Resources are available on the Apprenticeship website with further information on ways you can increase the number of minorities and women in your program. These resources can be found at the following link: <http://www.labor.state.ny.us/apprenticeship/apprenticeship-newsletters.shtml>. In addition, we will be happy to provide technical assistance to ensure you are making all possible good faith efforts to meet Equal Employment Opportunity (EEO) standards.

Please note, we will continue to review your program's EEO performance, particularly at time of Recruitment and at Recertification.

We understand the journeyworker data above reflects information from your AT603 which was filed within the last five years, and therefore, may not be an exact representation of your current workforce. If you feel the data does not accurately reflect your apprenticeship program or workforce, or if you have additional pertinent information you would like to provide, please submit to your ATR, <ATR>, at <ATR Email Address>.

Sincerely,

Jane Thompson
Director,
Apprenticeship Training

Page 2 provides recommendations for reaching underrepresented populations.

| | Minorities | | Women | |
|---------------|---|-------|--|------|
| Line A | A Number of minority apprentices in your program (per database from AT401s) | 837 | Number of women apprentices in your program (per database from AT401s) | 182 |
| Line B | B Number of minority journeyworkers (pg. 4 of AT603 – add African Amer., Hispanic & Other Minority) | 9,822 | Number of women journeyworkers (pg 4 of AT603) | 280 |
| Line C | C Percentage of minorities in the labor market where you recruit (pg 3 of AT603) | 63.9% | National standard for women in apprenticeship (pg 3 of AT603) | 6.9% |

Line B: Page 4 of AT-603

A. CURRENT STAFFING IN THE ABOVE TRADE

| | Total | African American | Hispanic | Other Minority | Women |
|-----------------------|--------|------------------|----------|----------------|-------|
| Active Journeyworkers | 15,374 | 5780 | 3563 | 479 | 280 |
| | 15.3% | 37.6% | 2.9% | 3.1% | 1.8% |

Line C: Page 3 of AT-603

B. The total minority and women staffing goals of this program are the percentage of these groups in the labor force in the county (counties) of recruitment.
63.9% for minorities; 6.9% current standard for females.

This chart is part of the letter and contains information for a sample program.

Line A shows the number of minority and women apprentices in the program – this comes from our database from information provided on AT401s.

Line B shows the number of minority and women journeyworkers – this comes from the “Current Staffing” section on page 4 of the AT603 (shown in yellow). The number of minority journeyworkers is obtained by adding the African American, Hispanic & Other Minority active journeyworkers.

Line C shows the percentage of minorities in the labor market where the sponsor recruits – this comes from the “Total Minority and Women Staffing Goals” section on page 3 of the AT603 (shown in blue). For women in apprenticeship, there is a national standard of 6.9%.

| | Minorities | | Women | | |
|---------------------------|------------|--|---------|---|---------|
| Chart from previous slide | A | Number of minority apprentices in your program (per database from AT401s) | 837 | Number of women apprentices in your program (per database from AT401s) | 182 |
| | B | Number of minority journeyworkers (pg. 4 of AT603 – add African Amer., Hispanic & Other Minority) | 9,822 | Number of women journeyworkers (pg 4 of AT603) | 280 |
| | C | Percentage of minorities in the labor market where you recruit (pg 3 of AT603) | 63.9% | National standard for women in apprenticeship (pg 3 of AT603) | 6.9% |
| Line D | D | Percentage of minority apprentices in your program (Line A / total # active apprentices per database) | 68.66% | Percentage of women apprentices in your program (Line A / total # active apprentices per database) | 14.93% |
| Line E | E | EEO Performance – Minority (apprentices only) (Line D / Line C) | 107.47% | EEO Performance – Women (apprentices only) (Line D / Line C) | 216.38% |
| Line F | F | Percentage of minority apprentices and journeyworkers (Lines A+B / total # active apprentices per database + total journeyworkers per AT603) | 63.44% | Percentage of women apprentices and journeyworkers (Lines A+B / total # active apprentices per database + total journeyworkers per AT603) | 2.75% |
| Line G | G | EEO Performance – Minority (apprentices and journeyworkers) (Line F / Line C) | 99.28% | EEO Performance – Women (apprentices and journeyworkers) (Line F / Line C) | 39.85% |

The top chart is carried over from the previous slide.

Line D shows the percentage of minority and women apprentices in the program. This is equal to the number of minority/women apprentices in Line A divided by the total # of active apprentices currently in the program (from our database).

Line E shows EEO performance for minority and women – apprentices ONLY. This is equal to Line D divided by Line C.

Line F shows the percentage of minority and women apprentices and journeyworkers. This is the same calculation as Line D, but includes journeyworkers.

Line G shows EEO performance for minority and women – apprentices AND journeyworkers. This is equal to Line F divided by Line C.

What is Satisfactory?

Satisfactory – either Line E **or** Line G is at or above 80% (for both minorities and women).

Unsatisfactory – both Line E **and** Line G are below 80% (for either minorities or women).

| | | | | |
|---|--|---------|---|---------|
| E | <i>EEO Performance – Minority (apprentices only)</i> | 107.47% | <i>EEO Performance – Women (apprentices only)</i> | 216.38% |
| G | <i>EEO Performance – Minority (apprentices and journeyworkers)</i> | 99.28% | <i>EEO Performance – Women (apprentices and journeyworkers)</i> | 39.85% |

The program would have a status of **Satisfactory** if either Line E **or** Line G is at or above 80% (for both minorities and women).

The program would have a status of **Unsatisfactory** if both Line E **and** Line G are below 80% (for either minorities or women).

In this example, the program is Satisfactory because Line E is above 80% for both women and minorities.

What if a Program's EEO Performance is Unsatisfactory?

- Increase outreach
- Change the recruitment type
- Utilize Direct Entry
- Revise the minimum qualifications/selection criteria

If a program has a status of unsatisfactory, the sponsor may consider doing one or more of the following, as outlined in the letter:

Increase outreach

- Make changes to where recruitments are publicized in order to reach target populations.
- Use publications and/or Community Based Organizations (CBOs) – local newspapers, minority churches and radio stations, and other organizations.
- Some CBOs may also provide support services such as child care and transportation.

Change the recruitment type

- Review the type of recruitment being used to determine if it is maximizing the candidate pool.
- Apprentice Training Representatives can assist with making changes to recruitment methods.

Utilize Direct Entry

- An alternative method of enrolling apprentices allowing sponsors to reach underrepresented populations which may help with meeting EEO goals.

Revise minimum qualifications/selection criteria

- Consider whether the minimum qualifications and/or selection criteria for apprentices should be revised in order to reach better qualified candidates.