

## Best Practices for Communicating EEO Requirements to Employers/Sponsors of Registered Apprentices

The **National Urban League (NUL)**, with its regional **Urban League Affiliates** and subcontractors the **Multicultural Media, Telecom and Internet Council (MMTC)** and **Wireless Infrastructure Association (WIA)**, serves as an Equity Partner under a U.S. Department of Labor (USDOL) contract to help employers ensure that diversity and inclusion (D&I) is embedded in their outreach efforts for their Registered Apprenticeship (RA) programs. The legal requirements for Equal Employment Opportunity (EEO) and Affirmative Action Plans (AAP) are contained in the USDOL's 29 CFR 30 regulations. These regulations, developed in 1976 and updated in 2016, are designed to help employers attract a larger and more diverse applicant pool, which simultaneously helps them to bridge skills, labor, and unemployment gaps.

Many employers/sponsors are already implementing some of the 29 CFR 30 guidelines but need assistance understanding the requirements. To demystify the process of complying with the USDOL's EEO and D&I goals, NUL has simplified the key components of EEO compliance and Affirmative Action Plans.

### Key Components of EEO Obligations: The 5 "D's" to Demystify EEO for Employers

It is important to communicate the 29 CFR 30 regulations to employers in a way that is easy to understand and reflects that the regulations **neither require nor should result in QUOTAS**. The 5 "D's" to understanding the USDOL's EEO requirements for employers are:

- ✓ **DESIGNATE:** Designate an individual (s) to oversee the company's EEO efforts
- ✓ **DON'T DISCRIMINATE:** Protect employees – keep the workplace free from discrimination, harassment, intimidation, and retaliation using anti-harassment training and complaint procedures.
- ✓ **DIVERSIFY:** Conduct broad outreach and recruitment – provide notice to diverse recruitment sources about openings at within the company..
- ✓ **DISTRIBUTE:** Distribute the EEO policy – publish and post an Equal Employment Opportunity (EEO) Pledge and information regarding the right of apprentices to file discrimination complaints.
- ✓ **DETAIL:** Keep detailed records – maintain detailed records about D&I efforts necessary for the state or federal apprenticeship agency.

### Demystifying Affirmative Action Plans: "Cooking with GAS"

Employers are required to develop an Affirmative Action Plan (AAP) to ensure equal opportunity in the recruitment, selection, employment, and training of apprentices. **AAPs are NOT QUOTAS** and do not require employers to hire candidates who are not qualified. The deadlines to develop an AAP are:

- *Existing employers:* January 18, 2019 (two years 29 CFR 30 update).
- *New employers:* Up to 2 years from the date they become an RA sponsor.

AAPs are designed to fuel the employer's diverse hiring practices. A handy way to remember what is required of employers with strong Affirmative Action Plans is to say they are "cooking with GAS" as they recruit a wider selection of qualified candidates for open positions.

- **GOALS:**
  - ✓ Develop diverse hire placement goals for the company's workforce
- **ACTIONS:**
  - ✓ Identify areas of concern and corrective actions
  - ✓ Create action-oriented programs
  - ✓ Develop an internal audit and reporting system
  - ✓ Summarize year-over-year AAP progress
  - ✓ Develop guidelines on discrimination and procedures for corrective action managers should take
- **SURVEY:**
  - ✓ An organization profile and apprentice demographics
  - ✓ Breakdown of employee diversity by occupation
  - ✓ Personnel activity such as promotions, terminations, and layoffs
  - ✓ List manager, EEO manager, and supervisor responsibilities

**The National Urban League's Consortium to diversify Registered Apprenticeships offers assistance to employers to create effective Affirmative Action Plans for their workforce and to review existing Affirmative Action Plans for their compliance with federal EEO and AAP requirements. We encourage others to use the tools outlined above when working with employers to help demystify Affirmative Action Planning and dispel some of the myths associated with EEO compliance.**

**For more information on creating a Registered Apprenticeship program, becoming a partner, or becoming an apprentice, email Brandi Pray, Manager, Workforce Development at [bpray@nul.org](mailto:bpray@nul.org).**

**Visit [www.nulapprenticeships.org](http://www.nulapprenticeships.org)**



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