
APPRENTICESHIP AND TRAINING DIVISION GUIDE TO IMPLEMENTING THE OREGON PLAN

Oregon Plan for Equal Employment Opportunity in Registered Apprenticeship Programs



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BUREAU OF LABOR AND INDUSTRIES
APPRENTICESHIP AND TRAINING DIVISION

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Introduction

Registered Apprenticeship Programs (RAPs) are proven, direct career pathways to the middle class for many Americans. They help employers build a workforce tailored to meet their needs and create career opportunities that build communities across the country.

The US Department of Labor (USDOL) has long provided rules against discrimination based on race, color, national origin, and sex, and has required apprenticeship programs to engage in affirmative action efforts that ensure equal opportunity in apprenticeship. In 2017, USDOL updated the Code of Federal Regulations for Equal Employment Opportunity in Registered Apprenticeship (29 CFR 30) for the first time since 1978. In May 2021, USDOL approved the Oregon Plan for Equal Employment Opportunity in Registered Apprenticeship Programs (Oregon Plan) to align with the revised Code of Federal Regulations.

This update is critical as there are still great disparities for certain groups when it comes to their ability to not only access registered apprenticeship but, see it through to successful completion. Women, for example, continue to represent less than 10% of registered apprentices, despite composing one-half of the workforce. Black, Indigenous, and People of Color (BIPOC) are also under-represented in many industries compared to their representation in workforce¹.

The Oregon Plan is a tool to help programs effectively grow by providing guidance and resources to aide with development of better recruitment strategies that will reach a larger and more diverse pool of applicants. Additionally, it helps programs improve the overall experience for all individuals in registered apprenticeship and improve retention, completion rates and the quality of Oregon programs. Implementing the Oregon Plan will require continuous effort on the part of the ATD staff and our registered apprenticeship partners. For this reason, ATD has put together robust training materials, including a five-part video training series, along with this guide to help programs implement the various aspects of the Oregon Plan.

ATD staff is here to provide technical assistance to our registered apprenticeship partners. Feel free to contact us at ATD.General@boli.oregon.gov with your questions or to schedule a one-on-one consultation with a member of the ATD Team.

Links to all templates included in this guide are available on the ATD [website](#).

The full text of the Oregon Plan for Equal Employment Opportunity in Registered Apprenticeship Programs is permanently located [here](#).

Thank you for all you do to support registered apprenticeship in Oregon!

Sincerely,



Lisa Ransom, Director
Bureau of Labor and Industries-Apprenticeship and Training Division

¹ https://www.dol.gov/sites/dolgov/files/ETA/apprenticeship/pdfs/EEO_Rule_Overview_Fact_Sheet.pdf

Section 1: Guide for Anti-Harassment Training

Anti-Harassment training is a fundamental activity that assists registered apprenticeship programs (RAPs) in creating an environment that operates free of harassment and discrimination based on race, color, religion, national origin, sex, sexual orientation, age, genetic information, and disability. Good anti-harassment training:

1. Explicitly states the program's policy that harassment and discrimination are not tolerated.
2. Clearly defines what behaviors are problematic and potentially unlawful.
3. Creates opportunities for participants to engage with the material and to ask questions for clarity.
4. Informs participants about their rights and what actions are available to them if they feel they have experienced harassment or discrimination during apprenticeship training.

Section 1 will provide an overview of the requirements for anti-harassment training, including who must receive training; training requirements; and provides links to resources available to RAPs that will assist in meeting the requirements of the Oregon Plan for anti-harassment training.

1.1 Anti-harassment Training Requirements

Oregon Plan for Equal Employment Opportunity in Registered Apprenticeship (3) (f) (i) (1-3)

The sponsor must provide anti-harassment training to all individuals connected with the administration or operation of the apprenticeship program, including all apprentices and journey workers who regularly work with apprentices. This training must not be a mere transmittal of information, but must include participation by trainees, such as attending a training session in person or completing an interactive training online. The training content must include, at a minimum, communication of the following:

1. *That the Sponsor shall not tolerate harassing conduct;*
2. *The definition of harassment and the types of conduct that constitute unlawful harassment on the basis of race, color, religion, national origin, sex, sexual orientation, age (18 or older), genetic information, and disability; and*
3. *The right to file a harassment complaint under section 14, ORS 660, and ORS 65A.*

1.1 a Who is Responsible, Who Must Receive Training

The Oregon Plan requires that all registered apprenticeship programs provide anti-harassment training. Since the objective of this training is to create an apprenticeship training environment that is free from

harassment and discrimination, this training must be delivered to all individuals that are connected with administering or operating the apprenticeship program. This means anyone that apprentices regularly come into contact with as a part of their training and includes:

- Apprentices
- Journey workers and other supervisors
- Instructors
- Program administrators and coordinators
- Office staff and administrative support
- Any other individuals that apprentices can reasonably be expected to have regular interactions with as part of their training.

1.2 Interactive Training Requirement

Anti-harassment training must be delivered in a manner that is interactive. Interactive means that participants do not simply read a piece of paper and sign it. Participants should have the opportunity to ask questions or test their understanding of the material.

There are many ways to deliver anti-harassment training that is interactive. Some methods may include:

- In person or live via remote video trainings
- Training videos followed by a question-and-answer session, or
- Online training modules with quizzes and other interactive features.

There are benefits and drawbacks to of these delivery methods. For instance, in person or live remote trainings provide greater opportunities for participants to ask clarifying questions and to really engage with the information. Live trainings also require instructors that are competent and confident in their ability to present the material and answer challenging questions. They require planning and scheduling for groups of participants, which can present challenges.

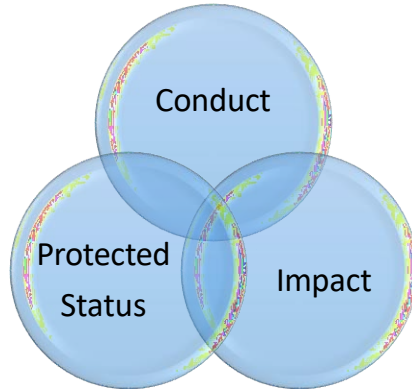
Alternately, online training modules may be more convenient, but they don't allow participants the opportunity to ask clarifying questions or to wrestle with challenging material with the support of skilled trainers. Additionally, it can be challenging for programs to track who has received online training.

Each RAP should thoughtfully consider which method of training best meets the needs and capacity of the program.

1.3 Required Anti-harassment Training Content

Anti-harassment training materials must clearly define what harassment is. Training should include clear statements of the types of behavior that can be considered harassing. Illegal harassment means that the behaviors are directed at a member of a protected class because of their status. ATD strongly encourages your program staff and anti-harassment trainers to use the definitions provided in the resources provided in Section 1.1e of this guide.

At minimum, this definition should include that illegal harassment is a combination of negative behavior/conduct directed at individuals or groups that have protected status because of that status and that the impact of these behaviors is such that a reasonable person believes that enduring them is necessary to keeping their job or apprenticeship. This definition is illustrated in the diagram below:



The definition must include examples of the types of negative conduct or behaviors, such as the use of slurs or epithets, unwanted flirtation, or sexual advances, bullying, intimidation, unwanted touching, etc. It should also provide a description of statuses that are protected under state and federal law to include race/ethnicity, age (18+), sex/gender, sexual orientation/gender expression, disability status, etc.

Anti-harassment training must also include the consequences for engaging in harassing or discriminating behaviors including disciplinary action that may result in the termination of the offending party.

An important component of the Oregon Plan is that all RAPs have a clear anti-harassment statement and strong policies and procedures for how it handles harassment complaints. Anti-harassment training should clearly direct participants to where the program's Anti-Harassment policy can be found and should review the specifics of the program's policy.

Programs that need assistance revising their harassment and discrimination policies and procedures should contact ATD at ATD.General@boli.oregon.gov to schedule a consultation with the EEO Work Team to develop concise, clear anti-harassment policies.

Finally, anti-harassment training must explain how participants can file a harassment/discrimination complaint. ATD has mailed posters to all programs to post in public areas of the training center. Additional copies of these posters can be downloaded and printed from the [ATD website](#).

1.4 Documentation Requirements

All programs must be able to document who has received Anti-Harassment Training. Each program can establish their own documentation method, which can include (but not limited to): issuing completion certificates and maintaining a copy in apprentice and staff records, copies of clearly printed sign in sheets, or copies of training registration spreadsheets.

It is important to remember that completion documentation must be kept for each group that is required to receive training, including:

- Apprentices
- Journey workers and other supervisors
- Instructors
- Program administrators and coordinators
- Office staff and administrative support
- Any other individuals that apprentices can reasonably be expected to have regular interactions with as part of their training.

Programs are required to provide completion documentation for each of these groups at the time of the Affirmative Action Compliance Review.

1.5 Anti-harassment Training Resources

There are many resources available to assist programs in implementing anti-harassment training. This section highlights materials that are free to Oregon RAPs and which include instructor/facilitator tools. Each of these resources meet the requirements for anti-harassment training under the Oregon Plan.

High 5 Teams Training Materials

The High 5 Teams training was developed through a collaboration with ATD staff and Oregon State University to meet the specific needs of registered apprenticeship. This training is comprehensive and helps programs develop Cultural Intelligence (CQ) and effective communication skills that support retention by creating inclusive, effective, and productive teams across apprenticeship training.

The High 5 Teams curriculum consists of four (4) sessions that range from 1.5 – 2 hours each. These sessions can be delivered in person or using a live, remote link. The sessions involve a lot of participant interaction, including surveys, break out groups, thought exercises, and more. The modules are as follows:

- Module 1: Effective Team Communication and Cultural Intelligence (CQ)
- Module 2: High 5 Teams: Skillful Us of the Tools
- Module 3: The Right Communication Tool at The Right Time
- Module 4: High 5 Communication Team Performance Specification in Action.

Each module comes with instructor materials and Power Point presentation. There are a range of supplemental materials from case study scenarios to strategies for teaching the material in an online environment.

High 5 Teams may seem like a significant investment of time and employee resources. However, the benefit of this training is how expansive it is. Not only does it meet the requirements of the Oregon Plan,

High 5 Teams also leads to work teams that are stronger, more inclusive, and in which apprentices and training staff have a variety of tools for effective and respectful communication.

The entire suite of High 5 Teams material is located [here](#).

U.S. Department of Labor – Office of Apprenticeship

The US Department of Labor Office of Apprenticeship (OA) offers several resources to assist RAPs with creating an environment free of harassment and discrimination. These resources include flyers and info sheets for apprentices and programs staff as well as two training resources.

The first training, Unlawful Harassment in Apprenticeship Programs is a facilitator led training using PowerPoint. It can be delivered in person or through a live, remote training. This training includes open ended group discussion questions, role play scenarios, and break out discussions.

The second resource offered by OA is an online self-directed training. This method of training involves sharing a video to all trainees and following up with a web-based quiz.

Note: Using the resources provided by the Office of Apprenticeship requires additional steps be taken by programs.

Committee choosing to utilize the OA materials should take into considerations the following:

- The facilitator led Power Point needs to be customized to the specific RAP
- The self-directed training video must be accompanied by the Checking Your Knowledge web-based quiz to include an interactive component.
 - Programs will have to establish a way of documenting who has completed the self-directed training. There is no completion certificate or proof of completion offered by the website.
 - Documentation must include apprentices, journey workers, instructors, administrators, and other program staff that regularly encounter apprentices.
 - This documentation will be due at the program’s compliance review.

Office of Apprenticeship training resources are available [here](#). Programs interested in using these materials should begin by following the link that leads to the “Guide to Using the Anti-Harassment Training Program.”

In addition to the two training modules, OA has also provided several additional resources for RAPs, apprentices, and those that work with apprentices. These include:

- [Avoiding Discrimination and Harassment Sponsor Quick Reference Guide](#)
- [Unlawful Harassment in Apprenticeship: A Tip Sheet for Apprentices](#)
- [Addressing Harassment in Apprenticeship: A Fact Sheet for Those Who Manage, Train, and Mentor Apprentices](#)

Section 2: Guide for Annual Review of Personnel Processes

The Annual Review of Personnel Processes (Annual Review) is part of a program's affirmative action process. It is an internal activity which assists programs to identify and correct any areas of operation that may be presenting barriers to access and retention for diverse applicants and apprentices.

Section 2 of the ATD Guide to Implementing the Oregon Plan will review the requirements for the Annual Review; required aspects of program operations; and provide different examples of best practices for reviewing each required element. Additionally, included in Appendix A, is an Annual Review of Personnel Processes template and a completed sample can be found in Appendix B.,

All templates can be found on the Committee Resources section of the [ATD website](#).

2.1 Requirements of Annual Review of Personnel Processes

Oregon Plan for Equal Employment Opportunity in Registered Apprenticeship (9) (a)

As part of its affirmative action program, the Sponsor must, for each registered apprenticeship program, engage in an annual review of its personnel processes related to the administration of the apprenticeship program to ensure that the Sponsor is operating an apprenticeship program free from discrimination based on race, color, religion, national origin, sex, sexual orientation, age (18 or older), genetic information, and disability. This annual review is required regardless of whether the Sponsor is underutilized as described in section 5, paragraph (d). The Sponsor must be able to demonstrate that its annual review is careful, thorough, and systematic one and meets the prevailing standards for program evaluation. The Sponsor must be able to demonstrate that its annual review involves all aspects of the apprenticeship program at various levels of analysis, including the program as a whole, the participating industries, and the participating occupations.

2.1.a Who is Required to Complete the Annual Review & Timeline for Reporting

The Annual Review must be undertaken by all programs that are required to complete an Affirmative Action Plan. It applies to any program with five (5) or more apprentices, regardless of how many standards are registered to the program. The Affirmative Action Plan will be discussed in detail in Section 6 of the ATD Guide.

Timeline for Reporting

All programs that exist on or before November 1, 2021, are required to turn in the first Annual Review by April 30, 2022.

Programs that are approved after November 1, 2021, will turn in the Annual Review within two years after the registration date and at the time of regularly scheduled compliance reviews thereafter.

After the initial due date, programs will conduct the review annually and turn in all documentation at the program's regularly scheduled compliance reviews.

2.2 Annual Review: Required Components and Best Practices

The Oregon Plan requires that the Annual Review is “careful, thorough, and systematic.” This means that the review is not a simple box-checking exercise, rather programs must do a deep dive into all aspects of their operations to assess areas that may present barriers to enrollment and retention. Multiple evaluation methods should be employed to examine different areas of program operations.

Additionally, the Oregon Plan states that the Annual Review must meet prevailing standards for program evaluation. While program evaluation can vary across industries and areas of practice, there are four core standards that must be included for any evaluation to meet the “prevailing standards.” These standards and a brief definition are explained in the table below.

Standard	Description
Ethical	Evaluations should be understandable and fair in addressing stakeholder (apprentice) needs. They should protect the rights and dignity of applicants, apprentices, program staff, and stakeholders.
Useful	Evaluations should be conducted by qualified people that have a thorough understanding of their program’s operations. They should focus attention on the full range of individuals involved in their program. Finally, the information collected in the evaluation process should serve the needs of applicants and apprentices.
Feasible	Evaluation procedures should be practical and responsive to the way the program operates. They should use resources effectively and efficiently.
Accurate	Evaluation procedures should produce dependable information that supports decisions made with regards to modifying program operations.

Finally, the Oregon Plan requires that the Annual Review examine 16 specific areas of program operations to determine if the individual processes may have inequitable impacts on certain groups of applicants and apprentices.

ATD has created a tool, the Annual Review of Personnel Processes Template (see Appendix A), to assist programs with ensuring that they are reviewing each required area. Each required element is listed below, along with examples of best practices for reviewing the specific area.

Note: there are many ways to evaluate each specific element. The best practices provided for each area are not comprehensive. Programs can utilize the examples provided or develop other evaluation methods that meet their specific needs.

Best Practices

Planning

The Annual Review is a big undertaking. Best practices begin before a program even starts the review process. The first step to ensuring a careful and systematic review is planning. In Section 6 of this guide, you will learn that each program must have an Assigned EEO Authority. The EEO Authority is the apprenticeship program staff who has been designated as being responsible for ensuring that every element of the Oregon Plan is being followed.

The EEO Authority should create a plan that occurs over time. The review does not have to happen all at once. In fact, thorough reviews take time.

Best Practices:

- Create a plan for how each element will be evaluated.
- Break the review down into parts and schedule different areas throughout the year.
- Involve a variety of individuals to evaluate areas in which they have expertise.

Element 1: Outreach and Recruitment Activities

Every program that is required to participate in affirmative action activities already evaluates their outreach and recruitment activities on an annual basis through the Targeted Plan (see Section 5). There is no need for duplicate efforts. When completing the Annual Review template, programs can enter “See Targeted Plan” under the description of activities for outreach and recruitment.

Any changes made to the Targeted Plan should be documented under the “Program Modifications” column in the template.

Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
1. Outreach and Recruitment Activities: (Targeted Plan)	<ul style="list-style-type: none"> • See comments in Completed 2021 Targeted Plan 	<ul style="list-style-type: none"> • Developed new mentoring guide for seasoned apprentices that mentor new apprentices

Element 2: Accessibility to Individuals with Disabilities

To make apprenticeship more accessible to individuals with disabilities, programs must review their processes, facilities, and activities to determine if any of these elements are creating barriers to applicants with disabilities.

Best practices:

- Have clearly written procedures that identify which program staff is responsible for assessing accessibility and accommodation requests.
- Ensure all staff know the program’s procedures for responding to requests for accommodations, including those from applicants asking for modifications to testing and assessment procedures.
- Inspect physical facilities for accessibility.
- Inspect entrance ways and stairways for ADA compliance.
- Review applications and program materials to ensure they are produced in easily readable fonts that have adequate spacing, so they are easier to read.

Element 3: Qualifications for Apprenticeship

The minimum qualifications (MQs) for apprenticeship programs can pose barriers for applicants, while not actually assessing their fitness for apprenticeship training. This section asks programs to review minimum qualifications and to determine if they are necessary and/or if they pose barriers for successful application and completion of apprenticeship.

Best practices:

- Review MQs for essential elements.
 - Is the program requiring more than what the Minimum Guideline Standards for an occupation require? If so, why?
 - If higher levels of math or science are a part of the MQs, are there equitable alternatives applicants can use to demonstrate competency in those areas?

Element 4: Application and Selection Procedures

Reviewing the application and selection process can reveal areas (or specific items within the process) that are creating a barrier; potentially eliminating applicants who are female, black, indigenous, and people of color (BIPOC), or individuals with disabilities.

Best practices:

- Using the program's Annual Selection spreadsheet, examine the language of the application and selection procedures
 - Are there specific steps in which women and BIPOC drop off at a rate greater than their White, male counterparts?
- If the program requires an interview, is the interview panel diverse? Can applicants see someone with whom they culturally identify on the selection panel?
- Evaluate interview and scoring of applicants and ensure the process is documented. Compare the overall scoring impact on females, BIPOC, and those with disabilities.
- Compare and contrast the rate at which female and BIPOC applicants are selected to that of male and non-minority applicant.
- Identify the item within the selection process that is creating the disparity and incorporate mitigating steps if possible.
- Review application materials of individuals that did not meet the minimum qualifications:
 - Are there specific qualifications that are causing certain groups (women, Latinx, Black, other specific racial/ethnic groups) to not qualify?
- Look at the program's ranking system.
 - What kind of experience is being awarded extra points? What other related experiences are being considered? For example, would points be awarded to an individual with significant sewing experience, which requires dexterity and attention to detail, as it would be to someone with welding experience?
- Review documentation for granting application points for previous work experience to ensure it is uniform across all demographics.

- Identify where validation documentation can be found for any test that is a part of minimum qualifications.

Element 5: Onboarding New Apprentices and Apprentices Returning from Leave

Onboarding is a significant step to retain apprentices. Apprentices, whether new or returning from an extended absence, need to know what the expectations are, what resources are available to help them succeed, and how they can integrate into program processes.

Best practices:

- Review each aspect of the program orientation and onboarding process.
 - Are oral overviews of program Policy and Procedures provided or are apprentices expected to read them on their own?
 - How does the program ensure that apprentices understand what is required from them to successfully complete the program?
 - Does onboarding provide information about resources to support apprentices throughout their training (e.g., mentorship programs, affinity groups, tutoring, mental health resources)?
- What processes are in place for apprentices returning from an extended leave of absence to ensure they successfully reintegrate into their training?

Element 6: Handling of Requests for Reasonable Accommodations

All staff should have a basic understanding of the program's policies and procedures for accommodation to avoid making decisions that are contrary to state and federal laws protecting individuals with disabilities from discrimination. At a minimum, staff should know who is the EEO Authority, familiarize themselves with the program's policy for requests for reasonable accommodation and its location.

Best Practices:

- Review any requests for accommodation received within the previous year:
 - Was it easy for applicants, apprentices and/or staff to navigate the process for making requests?
 - Was the designated EEO Authority clearly identified?
 - Did the responding staff engage in an interactive process with the person requesting an accommodation?
- In addition to a policy, is there a written procedure for responding to accommodation requests? How was it distributed? Is it accessible to all program staff?

Element 7: Wages

In registered apprenticeship, wage and wage progression are designed to be the great equalizer. All second term apprentices, regardless of race/ethnicity, gender, ability status, age, etc., earn a second term wage rate.

Best Practice:

- Survey apprentices to determine if wage progression is being applied consistently.

Element 8: Job Performance

Apprentices should understand their employability and skill level based on feedback from their employers. Training agents should objectively evaluate apprentice performance and provide feedback in a way that is consistent to all apprentices. This evaluation should be provided to the program so that actions can be taken were needed.

Best practices:

- Review MPR and OJT tracking forms. Is there a place for training agents to provide feedback on apprentice job performance?
- Develop and implement an apprentice survey which allows them to provide feedback about whether they are receiving feedback about their skills and deficits.
- Compare and contrast the evaluation comments apprentices have received. Are there patterns demonstrating that different groups are receiving different levels or types of feedback?

Element 9: Advancement Opportunities

Apprentices achieve advancement through rerates (step increases). This process should be reviewed for consistency and whether advancement is equitable to all apprentices.

Best practices:

- During semi-annual reviews, compare the progress of females, BIPOC, and those with disabilities to others in the same cohort.
- Evaluate a yearly cohort of apprentices and identify those that have fallen behind the cohort. Are females, BIPOC, and those with disabilities unequally represented? (This could be accomplished outside the semi-annual review process.)
- Determine the percentage of females, BIPOC, and individuals with disabilities that have not been rerated in over a year; compare it to the percentage and male/white apprentices that have not been rerated in over a year.

Element 10: Promotions

In registered apprenticeship, promotion is the movement from apprentice to journey worker.

Best practices:

- Chose a cohort of apprentices to evaluate, such as a group that started in 2015.
 - Are there disparities in the number of women, BIPOC, and individuals with disabilities successfully finishing their training relative to their white and/or male peers?
 - If disparities are noted, where are different groups cancelling or not successfully completing? Related training classes? OJT?
- Does the program communicate work availability and implement dispatch procedures equitably so that all apprentices can complete in a timely manner?

Element 11: Work Assignments Appropriate for Training

Work assignments can have a significant impact on an apprentice's knowledge and skills. If an apprentice is continuously moved from job site to job site to meet contractual requirements or for other reasons, that apprentice might receive work assignments that aren't appropriate to their term. Thus, that apprentice may be re-rated due to the accumulation of OJT hours and related training, without having gained the skill one would expect for them to move to the next term.

Best practices:

- Conduct an audit by randomly selecting the MPRs for a specific term of apprenticeship.
 - Are the work processes similar for the files that were pulled?
 - Are there patterns demonstrating that certain groups are getting work assignments above or below what one would expect for that term?
- Interview a random selection of apprentices from a specific term.
 - Does their experience correlate with what is listed on their MPRs?
 - Are they doing the type of work they would reasonably expect relative to their current term and the work processes outlined in their training plans?

Element 12: Rotation Among All Work Processes

Work assignments (Element 11) are typically assigned by employers. Rotation among work processes is the responsibility of the apprenticeship program. Rotation procedures should be applied consistently and equitably to ensure all apprentices can become skilled in each aspect that is essential to their trade.

Best Practices:

- Are there written policies and procedures for rotating apprentices?
- If training agents/employers are responsible for rotation, how is the program ensuring equitable implementation?
- Conduct an audit of apprentice files for a specific term, preferably at 80% or higher of program completion:
 - Have all apprentices received training in 75% of work processes?
 - Are there disparities among groups relating to how much training they have received in the work processes?

Element 13: Initiatives to Establish and Maintain Total Worker Health and Handling of Leave Requests

A total worker health approach prioritizes a hazard-free work environment for all workers. It brings together all aspects of work in integrated interventions that collectively address worker safety, health, and well-being. Traditional occupational safety and health protection programs have focused on ensuring that work is safe and that workers are protected from the harms that arise from work itself. A total worker health approach goes further and includes factors such as wages, work hours, workload, interactions with coworkers and supervisors, and

access to paid leave. Total worker health promotes the well-being of workers, their families, and their communities.

Best Practices:

- Review health and wellness programs offered by the program:
 - Are there ways to partner with organizations to provide trainings or programs relating to nutrition, mental health, etc.?
- Are there prominently displayed resources for suicide prevention, mental health assistance, substance abuse help, smoking cessation, etc.?
- Are program staff trained on how to direct apprentices to these resources?
- Does the program have formal or informal mentorship structures in place? Are there affinity groups that promote relationship building among traditionally underrepresented groups?
- Evaluate leave of absence requests received in 12-month period. Are there common themes emerging in the reasons that apprentices are requesting a leave of absence such as depression, anxiety, substance use disorder?
- Develop and implement suspension/leave of absence policies that allow apprentices to have adequate time to address items without adversely impacting their apprentice.

Element 14: Initiatives to Establish and Maintain Respectful Workplaces

A respectful workplace is where all employees are treated fairly, difference is acknowledged and valued, communication is open and civil, conflict is addressed early and there is a culture of empowerment and cooperation.

Best Practices:

- Does the program have a clearly articulated policy about its commitment to respectful workplaces?
- How does the program incorporate respectful workplace concepts into orientation, classes, presentations, and other trainings?
- How does the program ensure that training agents understand the expectations for maintaining a respectful workplace? How do programs evaluate training agent practices?
- Survey apprentices about their experiences in all aspects of their apprenticeship training:
 - Do they report feeling unwelcomed and/or undervalued?
 - Do they name specific areas or employers where they feel unsafe or disrespected?

Element 15: Disciplinary Actions

Disciplinary actions should be utilized as a part of correcting behavior and/or habits that are not conducive to successfully completing apprenticeship. These may include probationary discipline, denial of re-rate, and possibly termination. Disciplinary processes must be conducted in accordance with regulations and applied equitably.

Best Practices:

- Review all citations to appear or other disciplinary actions taken by the Committee in a 12-month period.
 - Are apprentices across demographics receiving the same consequences for the same or similar infractions?
- Are probationary terminations that are a result of the disciplinary process higher or lower for certain groups of individuals?
- Are disciplinary procedures specifically outlined in an apprentice handbook in language that is accessible? Is the appeal process included with the disciplinary policy?

Element 16: Handling Grievances and Complaints

Apprentices can file grievances and complaints for any aspect of their training that they identify as impacting their training, health, safety, or well-being. Complaints may be related to harassment and discrimination or other areas such as program operations or learning conditions.

Best Practices:

- Perform a walkthrough of the training center.
 - Are EEO posters that include the process for filing a harassment or discrimination complaint prominently displayed in public areas of the training center?
- For complaints that do not fall under the EEO umbrella, does the program have a form or other standardized method for collecting grievances or complaints? Is there a process for evaluating them?
- Review all grievances and complaints made over 12-month period.
 - Are there issues that seem to emerge over and over again? Is it a specific group or demographic that is bringing this issue to the program's attention?
- Compare the program's response to complaints received in a specific period.
 - Was the response process applied equitably to all apprentices?

Section 3: Guide for Utilization Analysis and Goals for Race, Sex, and Ethnicity

Utilization Analysis for Race, Sex, and Ethnicity is a review of the different groups of individuals (female, non-binary, BIPOC) that make up an apprenticeship program comparative to the population of the communities from which a program selects apprentices (geographical jurisdiction). Utilization Goals for Race, Sex, and Ethnicity set targets for recruiting and retaining apprentices from these traditionally underrepresented groups. Historically, these were called the Affirmative Action Goals and Timetables prior to the new guidance in the Oregon Plan.

Section 3 of this guide will inform programs about changes in reporting requirements for utilization analysis and goals, explain the elements that ATD uses when creating a Utilization Analysis workbook for programs, and explain how programs should use this information to create realistic, attainable, and

ambitious goals for diversifying the apprenticeship program to reflect the community in which it operates.

Oregon Plan for Equal Employment Opportunity in Registered Apprenticeship (5) (a)

Purpose. The purpose of the utilization analysis is to provide Sponsors with a method for assessing whether possible barriers to apprenticeship exist for particular groups of individuals by determining whether the race, sex, and ethnicity of apprentices in a Sponsor's apprenticeship program is reflective of persons available for apprenticeship by race, sex, and ethnicity in the relevant recruitment area. Where significant disparity exists between availability and representation, the Sponsor will be required to establish a utilization goal pursuant to section 6.

3.1 Demographic Reporting Data Changes

In 2017, the updated 29 Code of Federal Regulations, Part 30 changed the categories for reporting race and ethnicity in apprenticeship

The Federal Office of Management and Budget's Standards for the Classification of Federal Data on Race and Ethnicity made changes in defining "race" and "ethnicity."

The utilization of these changes to Federal apprenticeship reporting are required with the Oregon Plan.

Race & Ethnicity Changes

The two concepts of "race" and "ethnicity" are often used interchangeably, despite their differences. Race includes physical traits regarded as common among people of shared ancestry while, ethnicity encompasses cultural factors such as language and traditions of a distinct population.

Race, for purposes of recordkeeping and affirmative action, has the same meaning as under the Office of Management and Budget's Standards for the Classification of Federal Data on Race and Ethnicity, or any successor standards. Race thus refers to the following designations:

- White—A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
- Black or African American—A person having origins in any of the black racial groups of Africa.
- Native Hawaiian or Other Pacific Islander—A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- Asian—A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

- American Indian or Alaska Native—A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

Ethnicity thus refers to the following designations:

- Hispanic or Latinx—A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Not Hispanic or Latinx.

This means that programs can have apprentices that identify as both African American and Latinx, while others may identify as Dominicans and Haitians or any other racial group combination.

Gender Inclusive Changes

The inclusion of a third gender option for non-binary apprentices is an additional change to the Oregon apprenticeship registration agreement. “Non-binary” is used to describe the dual classification of exclusively female and male genders that do not fall into one of these two categories. People who are non-binary experience their gender as both male and female, and others experience their gender as neither male nor female. Non-binary can also be used as an umbrella term, encompassing many gender identities that do not fit into the male-female binary.

Apprentices can now select the gender that they most closely (comfortably) identify with at the time of registration. At any time, apprentices can change their selected gender identifier by contacting the Division directly or through their program administrator.

Reporting, Recordkeeping, and Activity Changes

The utilization sections provide the required updates to race and ethnicity tracking, including the addition of the Native Hawaiian or Pacific Islander racial identity and separate goal setting for apprentices who identify as having a Hispanic or Latinx ethnicity. Programs will also need to measure both female and non-binary apprentices as a targeted group.

All apprenticeship applications and ethnicity tracking systems must be updated to reflect the racial categories previously listed.

[Section 3.2 Utilization Analysis for Race, Sex, and Ethnicity](#)

The objective of the Utilization Analysis for Race, Sex, and Ethnicity is to provide an overview of the current ethnic composition of the program and for the Division to assess if it accurately reflects the career seeking community in those in those recruitment areas (geographical jurisdiction). Based upon the first page of your Utilization Goals for Race, Sex, and Ethnicity, the Division will provide the program with a utilization analysis designed to support the program to set achievable Goals.

Timeline and Variations

The Division’s Utilization Analysis will be completed at the same time as the Utilization Goals for Race, Sex, and Ethnicity (formerly known as the Affirmative Action Goals and Timetables). A separate

Utilization Analysis will be performed for each of the program’s standards that have five or more apprentices, unless the qualifying program has no standards that meet these criteria.

All programs are required to participate in Equal Employment Opportunity activities if they have five or more apprentices registered. There will no longer be exemptions for performing Equal Employment Opportunity activities for industrial, utility, and emerging trade apprenticeship programs or *programs with multiple standards with less than five apprentices*. If a program has five or more apprentices but does not have any single standard with five or more apprentices, then they will perform the Utilization Analysis for their program as a whole, not the individual standards.

Program Utilization Analysis Responsibilities

As part of the Utilization Analysis, programs must provide Training Agent Workforce Data for fixed site industrial and emerging trade training agents whose collective bargaining agreements require hiring apprentices exclusively from an internal pool.

Training Agent Workforce Data									
For Industrial & Fixed Site Training Agent Employers Required to Use an Internal Hiring Pool due to a Collective Bargaining Agreement									
Training Agent	Total Employees	Female and Non-Binary	Black or African American (Hispanic+NonHispanic)	American Indian or Alaska Native (Hispanic+NonHispanic)	Asian (Hispanic+NonHispanic)	Native Hawaiian or Other Pacific Islander (Hispanic+NonHispanic)	Hispanic or Latinx (All Races)	2+ Races (Hispanic+NonHispanic)	White (Not Hispanic)

The data obtained from the training agents will benefit programs in two ways:

- Provide assessment if the internal pool closely matches regional demographics calculated by the Division. If not, the program can provide suggestions for recruitment activities to their training agents.
- Provide guidance to programs on how to set Utilization Goals based on the available labor pool.

Apprenticeship & Training Division Utilization Analysis Responsibilities

The Division is responsible for completing the other two sections of the Utilization Analysis workbook.

Apprentice Program Demographics represents the current composition of a program’s active and suspended apprentices. This data is calculated using the information listed on the apprenticeship registration agreements and uploaded to the Oregon Apprenticeship Tracking System (OATS) portal. An example of that data is available below.

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Apprentice Name	Agmnt #	Symbol	Suffix	Apr Ethnic	Apr Hispanic	Apr Sex	Stat
		159		0 WH	N	M	A
		159		0 AI	N	M	A
		159		0 WH	N	M	A
		159		0 WH	N	M	A
		159		0 WH	N	M	A
		159		0 WH	N	M	A
		159		0 HI	Y	M	A
		159		0 WH	N	M	A

Statewide Occupation Demographics are calculated using the same apprenticeship data as Apprenticeship Program Demographics but include demographic information from all standards or programs with your trade(s) registered with the Division.

Regional Demographics using the US Census Bureau’s Quarterly Workforce Indicator data. The Division will calculate the demographics of the working population in the counties covered in apprenticeship standards using this tool. Quarterly Workforce Indicator data is more accurate than that of the general Census data that was used previously and is a true reflection of the working and work seeking population in a region. It should be noted that the regional workforce data is the only part of the Utilization Analysis where the inclusive gender identifier of non-binary is not represented. This omission is intentional due to the Census not yet tracking this information. A sample of the Quarterly Workforce Indicator sheet from the Division’s Utilization Analysis workbook is below.

Quarterly Workforce Indicator											
Mark "State of Oregon" with X if statewide jurisdiction approved in geographical area of standards. Otherwise, mark each county approved in the geographical area of the standards with X (including partial counties).											
County	In Standard	Total	Female	Black or African American (Hisp+NonHisp)	American Indian or Alaska Native (Hisp+NonHisp)	Asian (Hisp+NonHisp)	Native Hawaiian or Other Pacific Islander (Hisp+NonHisp)	Hispanic (All Races)	2+ (Hisp+Non Hisp)	White (Not Hisp)	
Statewide	x	1,854,087	905,939	52,870	27,417	98,753	8,822	230,744	60,673	1,407,734	
Total in Jurisdiction		1,854,087	905,939	52,870	27,417	98,753	8,822	230,744	60,673	1,407,734	
Workforce Availability			Female	Black or African American	American Indian or Alaskan Native	Asian	Native Hawaiian or Pacific Islander	Hispanic or Latinx (All Races)			
			24.4%	2.9%	1.5%	5.3%	0.5%	12.4%			
Counties in Geography											
Total White, Not Hispanic or Latinx % in Geography				75.9%			Total Minority (Historic 29CFR30)		24.1%		

Utilization Analysis Summary

The Division will transfer the summary Utilization Analysis on the first page of the Utilization Goals for Race, Sex, and Ethnicity template prior to sending it to programs. An example of that summary is shown below.

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Occupation apprentice composition as of September 16, 2021:

Percentage of Black or African American :	8.4% (8 of 95 apprentices)
Percentage of American Indian or Alaskan Native :	3.2% (3 of 95 apprentices)
Percentage of Asian :	5.3% (5 of 95 apprentices)
Percentage of Native Hawaiian or Pacific Islander :	2.1% (2 of 95 apprentices)
Percentage of Hispanic or Latinx (all races) :	14.7% (14 of 95 apprentices)
Percentage of female and non-binary :	8.4% (8 of 95 apprentices)

Workforce population for geographic area from Census workforce indicators:

Percentage of Black or African American :	3.4%
Percentage of American Indian or Alaskan Native :	1.3%
Percentage of Asian :	6.5%
Percentage of Native Hawaiian or Pacific Islander :	0.5%
Percentage of Hispanic or Latinx (all races) :	12.3%
Percentage of female :	24.3%

Statewide apprentice participation in occupation as of September 16, 2021:

Percentage of Black or African American :	5.1% (24 of 470 apprentices)
Percentage of American Indian or Alaskan Native :	1.7% (8 of 470 apprentices)
Percentage of Asian :	6.4% (30 of 470 apprentices)
Percentage of Native Hawaiian or Pacific Islander :	2.3% (11 of 470 apprentices)
Percentage of Hispanic or Latinx (all races) :	17.5% (82 of 470 apprentices)
Percentage of female and non-binary :	6.0% (28 of 470 apprentices)

Workforce population from training agent internal pool workforce analysis:

Percentage of Black or African American :	5.9%
Percentage of American Indian or Alaskan Native :	3.5%
Percentage of Asian :	6.0%
Percentage of Native Hawaiian or Pacific Islander :	1.2%
Percentage of Hispanic or Latinx (all races) :	11.6%
Percentage of female and non-binary :	39.4%

A copy of the full Utilization Analysis workbook can be provided upon request.

Section 3.3 Utilization Goals for Race, Sex, and Ethnicity

Utilization Goals for Race, Sex, and Ethnicity (formerly known as Affirmative Action Goals and Timetables) are three-year goals a program has determined as best practices for recruiting targeted groups who have historically been underrepresented in apprenticeships. The Goals are also used to measure the effectiveness of the outreach, recruitment, and retention activities listed in a program’s Targeted Outreach, Recruitment, and Retention Plan (See Section 5). Utilization Goals are set for each occupation/standard that has five or more active or suspended apprentices.

Goals and Timetables vs. Utilization Goals

The existing Goals and Timetables document has been modified to include the updated requirements for Utilization Goals.

For standards and qualifying programs with 11 or more apprentices, targeted racial categories are now broken down into four groups: Black or African American, American Indian or Alaskan Native, Asian, and Native Hawaiian or Pacific Islander. The below graphic demonstrates how the new layout for Utilization Goals for Race, Sex, and Ethnicity for standards with 11 or more apprentices and a full template for is provided in the back of this guide.

Percentage of Black or African American :	9.4% (8 of 85 apprentices)
Percentage of American Indian or Alaskan Native :	2.4% (2 of 85 apprentices)
Percentage of Asian :	4.7% (4 of 85 apprentices)
Percentage of Native Hawaiian or Pacific Islander :	1.2% (1 of 85 apprentices)
Percentage of Hispanic or Latinx (all races) :	2.4% (20 of 85 apprentices)
Percentage of female and non-binary :	10.6% (9 of 85 apprentices)

For standards and qualifying programs with between five to ten apprentices, the four racial categories listed above are combined into one group, but there will still be a separate goal set for Hispanic or Latinx

apprentices. The below graphic demonstrates how the new layout for Utilization Goals for Race, Sex, and Ethnicity for standards with ten or less apprentices.

<u>Program apprentice composition as of 9/16/2021:</u>	
Percentage of Black or African American, American Indian or Alaskan Native, Asian, and/or Native Hawaiian or Pacific Islander:	28.6% (2 of 7 apprentices)
Percentage of Hispanic or Latinx (all races):	14.3% (1 of 7 apprentices)
Percentage of female and non-binary:	14.3% (1 of 7 apprentices)

Utilization Goals - Objectives and Targets

Utilization Goals for Race, Sex, and Ethnicity should demonstrate incremental growth for targeted groups, but also be realistic and achievable. The Oregon Plan (Part 6.d) notes that Utilization Goals:

- May not be rigid and inflexible quotas, which must be met, nor are they to be considered either a ceiling or a floor for the selection of groups as apprentices.
- May not provide a program with a justification to extend a preference to any individual, select an individual, or adversely affect an individual's status as an apprentice, based on that person's race, sex, or ethnicity.
- Do not create set asides for specific groups, nor are they required to achieve proportional representation or equal results.
- May not be used to supersede eligibility requirements for apprenticeship and do not require programs to select a person who lacks qualifications to participate in the apprenticeship program successfully or select a less qualified person in preference to a more qualified one.

The Division's Role

ATD will:

- Inform programs, quarterly, of their Utilization Goals submission due date or their next scheduled compliance evaluation, whichever comes sooner.
- Provide relevant templates and workbooks.
- Complete the Utilization Analysis for Race, Sex, and Ethnicity workbook.
- Using the data obtained in the Utilization Analysis, complete the first page of the Utilization Goals for Race, Sex, and Ethnicity document.
- Email a copy of the incomplete Utilization Goals to the program for them to set the goals on the second page of the document.

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The Division’s Equal Employment Opportunity (EEO) Team will review the Utilization Goals for Race, Sex, and Ethnicity that programs submit. The EEO Team will provide guidance and recommendations for adjustments that may make the goals more achievable.

The Program’s Role

- Programs that are required to select apprentices exclusively from an internal pool as part of a collective bargaining agreement or that have training agents that only hire incumbent workers will need to fill out the *Training Agent Workforce Analysis* sheet with information provided by all Training Agents using exclusive internal pools (depicted in the image below).

Training Agent Workforce Data									
<small>For Industrial & Fixed Site Training Agent Employers Required to Use an Internal Hiring Pool due to a Collective Bargaining Agreement</small>									
Training Agent	Total Employees	Female and Non-Binary	Black or African American (Hispanic+NonHispanic)	American Indian or Alaska Native (Hispanic+NonHispanic)	Asian (Hispanic+NonHispanic)	Native Hawaiian or Other Pacific Islander (Hispanic+NonHispanic)	Hispanic or Latinx (All Races)	2+ Races (Hispanic+NonHispanic)	White (Not Hispanic)

- Programs will set their own incrementally increasing goals on the second page of the Utilization Goals document (See Appendices C and D). The goals should reflect achievable growth for the occupation and program based on the workforce data available for your region as determined in the Utilization Analysis.
- All Affirmative Action Plan materials, including Utilization Goals, require committee approval. Minutes showing an affirmative vote and the Utilization Goals document must be uploaded through the Oregon Apprenticeship Tracking System (OATS).

Best Practices

The Division recommends programs review their progress towards their Utilization Goals on an annual basis. Programs should evaluate and expand outreach, recruitment, and retention activities in their Targeted Plan (Section 5) if it appears that current efforts are not resulting in progress toward the approved Utilization Goals.

Section 4: Utilization Goals for Individuals with Disabilities

The Oregon Plan and the Code of Federal Regulation (Title 29, Part 30) established a goal of 7% for qualified apprentices with disabilities within each major occupational standard managed by a program. This goal is based on analysis conducted by the USDOL which estimates that 16% of the adult working population in the United States has a disability.

Utilization goals for individuals with disabilities may be a new concept to many programs. However, the efforts to attain these goals will be somewhat familiar as they involve developing strategies in the

program’s Targeted Plan (formerly AAWP) for outreach, recruitment, and retention for individuals with disabilities.

This section of the ATD Guide will:

1. Provide definitions for “disability” and associated terms
2. Identify the affirmative action steps programs are required to engage in under the Oregon Plan
3. Explain documentation, reporting, and privacy requirements
4. Review the tools that ATD has created to assist programs to comply with the Oregon Plan
5. Discuss best practices and provide information about additional resources to assist programs in developing outreach, recruitment, and retention strategies for individuals with disabilities

4.1 What is a Disability?

The Oregon Plan provides clear definitions for disability and other terms associated with defining discriminatory disability standards. These definitions are directly from the Americans with Disabilities Act, title I, as amended by, the Equal Employment Opportunity Commission’s regulations for implementing the ADA in the Code of Federal Regulations section 29, part 1630, and from the Oregon Revised Statutes, Chapter 659A.

In general, both the federal and state regulations define a disability as an impairment, which may be physical or mental, that substantially limits a person in a major life activity.

Major life activities include some things that may come immediately to mind like being able to see, hear, and walk. They also include things one might not ordinarily consider, such as being able to sleep, concentrate and communicate.

Below are terms and definitions that are essential for developing strategies to reach utilization goals for individuals with disabilities:

Key Term	Definition
Disability	<ul style="list-style-type: none"> • A physical or mental impairment that substantially limits one or more major life activities of an individual • A record of such an impairment, or • Being regarded as having such an impairment
Major life activities	<ul style="list-style-type: none"> • Include, but are not limited to: Caring for oneself, doing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working. • Impacts the operation of a major bodily function including, but not limited to: Functions of the immune system, special sense organs and skin, normal cell growth, and digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions. • The operation of an individual organ within a body system.
Physical or mental impairment	<ul style="list-style-type: none"> • Any physiological disorder or condition cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as

	<p>neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine; or</p> <ul style="list-style-type: none">• Any mental or psychological disorder, such as an intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.
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In Oregon, the Disability and Health Data System (DHDS) reports that 21.1% of Oregonians between the ages of 18 and 44 reported having a disability in 2019. The rate for older working age adults was even higher – 27.2% for those ages 45 to 64².

It is unlawful to exclude qualified individuals with disabilities from work opportunities, including registered apprenticeship. Excluding individuals with disabilities also closes off access to a significant talent pool which limits opportunities to meet the state’s workforce needs.

4.2 Requirements of the Oregon Plan

Section 7 of the Oregon Plan establishes key provisions that all programs must undertake with regards to individuals with disabilities. These include: Non-discrimination, equal employment opportunity, the opportunity for individuals to self-identify as having a disability, disability utilization analysis and reporting, providing instructions for how to file a complaint, and the process for receiving and evaluating requests for reasonable accommodations.

Non-Discrimination

The Oregon Plan and federal EEO regulations establish protections against discrimination for individuals with disabilities. In addition to protections from discrimination and harassment, qualified applicants and apprentices are entitled to reasonable accommodations for a disability if the accommodations do not pose an undue hardship for programs or their training agents.

Section 4.3 of the ATD Guide will provide information about the process for requesting reasonable accommodations and how those requests must be evaluated.

Equal Employment Opportunity

Programs that have five or more apprentices will need to document equal employment opportunity (affirmative action) efforts under the Oregon Plan.

The USDOL has set a nationwide utilization goal of 7% for individuals with disabilities. This goal applies to each major occupational standard within an apprenticeship program and covers the employment of qualified individuals with disabilities as apprentices.

Invitation to Self-Identify as an Individual with a Disability

Programs with five or more apprentices are required to present opportunities for individuals to voluntarily self-identify as an individual with a disability. This process of presenting opportunities is

²Behavioral Risk Factor Surveillance System (BRFSS). 2019 Reports. https://www.cdc.gov/brfss/annual_data/annual_2019.html

required of the program, but self-identification is voluntary for the individual. The Division has provided an Invitation to Self-Identify as an Individual with a Disability form that meets the criteria of the Oregon Plan and federal regulations in Appendix E.

Programs must offer the opportunity to self-identify at specific times. The table below provides information about the requirements for when to issue the invitation to self-identify as an individual with a disability and what is required under the Oregon Plan and federal apprenticeship regulations.

When	What
Pre-Offer -- Applicants	<ul style="list-style-type: none"> • Must be provided to every applicant when applying or being considered for apprenticeship • Must be separate from the application though it may be included with application materials
Post-Offer – Applicants	<ul style="list-style-type: none"> • Programs must invite applicants to inform the program if they are an individual with a disability using the language and, in the manner, provided on the Invitation to Self-Identify form. • This must occur between the time an applicant is accepted into the apprenticeship program but before the applicant is registered.
Current Apprentices – Apprentices registered prior to November 1, 2021	<ul style="list-style-type: none"> • Programs must make a one-time invitation to current apprentices to inform the programs if they are an individual with a disability • Must be made using the language and in the manner provided on the Invitation to Self-Identify form provided by the Division.
Annually	<ul style="list-style-type: none"> • Programs must remind apprentices yearly that they may voluntarily update their disability status.

The self-identification of disability status is confidential and must be kept separate from any application considerations and applicant and apprentice files.

Best Practice: Programs should review the Invitation to Self-Identify forms on file at least once a year and move completed and terminated apprentices to a different file for inactive participants.

As with all apprentice records, programs must retain copies of the invitations to self-identify for five years after the last action date of the apprentices in your program. Copies of the Invitation to Self-Identify as an Individual with a Disability form will be reviewed at the time of the program’s compliance review.

Disability Utilization Analysis and Reporting

The Division will provide a Disability Utilization Workbook for programs to use to track and report their compliance with these regulations and to understand their performance relative to the utilization goals. An example is pictured below.

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Program Disability Workforce Data			
9991		Program Name:	Southern Limited Ele
Occupation	Symbol. Suffix	Total Active & Suspended Apprentices	Total Active & Suspended Apprentices with Disclosed Disabilities
Limited Energy - A	459.0	75	5
Limited Energy - B	459.1	25	4
Totals		100	9
Percent of Apprentices with Disclosed Disability			9.0%

Programs will use the information obtained from the completed Invitation to Self-Identify as an Individual with a Disability form to complete the workbook. Only the total number of active and suspended apprentices registered at the time of the compliance review should be recorded.

The completed Disability Utilization Workbook will help programs meet the analysis and reporting information required by the Division. It will also help to determine a program’s progress towards the disability utilization goal of at least 7% of each occupation’s apprenticeship population.

The Disability Utilization Workbook will be provided to programs at the time they are notified of an upcoming compliance review. Programs will have 30 days to return the workbook to the Division along with any other materials requested at that time. Programs that demonstrate good cause may ask for a one-time 30-day extension for their submission.

Filing a Complaint

Programs must provide written notice to all applicants and apprentices about their right to file a complaint if they believe they have been subject to discrimination based on their disability status, including the contact information and procedure for doing so. See Section 1.3 of this guide for more information about filing a complaint and the resources ATD has provided to assist programs in meeting this requirement.

Privacy Guidelines

Applicants and apprentices have the right to keep their disability status or condition private. This applies to the voluntary nature of the self-disclosure and the requirement to keep the records confidential.

Programs and training agents cannot require medical verification of an individual’s disability status unless they have received a request for reasonable accommodation, at which time they can request medical verification of the condition that requires accommodation.

All medical information, including completed Invitation to Self-Disclose forms must be maintained separately from applicant, apprentice, and/or supervisory files. Hard copy files should be kept under lock and key and electronic records should be encrypted.

Programs are encouraged to consult the Oregon Bureau of Labor and Industries [Disability Rights](#) web site to review frequently asked questions information for workers and employers.

BOLI’s Technical Assistance for Employers unit is available to provide guidance for employers or workers with questions about disability rights and reasonable accommodations:

BOLI_TAFrontDesk@boli.oregon.gov.

4.3 Requests for Reasonable Accommodations

The American with Disabilities Act (ADA), Oregon Revised Statutes part 659a, and the Oregon Plan protect apprentices and applicants from discrimination based on disability. Programs and training agents may not discriminate against **qualified applicants** nor apprentices who meet the Minimum Qualifications for entry into an apprenticeship program and who are able to perform its **essential functions**, with or without accommodation. Programs and training agents are required to make **reasonable accommodations** for applicants and apprentices with disabilities to allow them to perform their jobs *unless* providing the accommodation would pose an **undue hardship**.

The bolded terms above are essential for programs to understand for evaluating requests for reasonable accommodations. These, and other key terms, are defined in the table below.

Key Term	Definition
Qualified Applicant	An individual who, with or without reasonable accommodation, can: <ul style="list-style-type: none"> • Perform the essential functions of the apprenticeship program for which the individual applied, or • Is enrolled in and meets the minimum qualifications as set forth in the apprenticeship program standards.
Essential Functions	The fundamental duties of a position: the things a person holding the job absolutely must be able to do. An applicant or apprentice who can't perform the essential job functions, even with a reasonable accommodation, isn't considered a qualified applicant or apprentice covered under the Americans with Disabilities Act.
Reasonable Accommodation	<ul style="list-style-type: none"> • Modifications or adjustments to an apprenticeship application process that enable a qualified applicant with a disability to be considered for the program they desire to enter. • Modifications or adjustments to the work environment, or to the manner or conditions of the position that allow a qualified individual to perform the essential functions of that position. • Modifications or adjustment that enable an apprentice with a disability to enjoy equal benefits and privileges of the apprenticeship training program that are enjoyed by other

	<p>apprentices without disabilities.</p> <ul style="list-style-type: none"> • May include, but are not limited to: <ul style="list-style-type: none"> ○ Making existing facilities accessible and usable by individuals with disabilities, ○ Job restructuring; part-time or modified work schedules; reassignment to a vacant position, ○ Acquisition or modifications of equipment or devices, ○ Appropriate adjustment or modifications of examinations, assessments, training materials, or policies, ○ Providing qualified readers or interpreters.
Undue Hardship	<p>Significant difficulty or expense incurred by a program to provide a reasonable accommodation. Factors to evaluate in determining undue hardship include:</p> <ul style="list-style-type: none"> • The nature and net cost of the accommodation needed, including potential tax credits and deductions and outside funding sources, • The overall financial resources of the <i>facilities</i> involved in providing the accommodation and the effect on expenses and resources, • The overall financial resources of the <i>program</i> with respect to the number of apprentices and the number, type, and location of its facilities, • The type of operations of the program, including its composition, structure, and functions of its workforce, how separate its facilities may be geographically, and the administrative or fiscal relationship of training facilities in relation to the program.
Interactive Process	<p>A process of evaluating a request for reasonable accommodations in which the program has a discussion with the applicant or apprentice and potentially their healthcare provider about the nature of their disability and the limitations that may affect their ability to perform essential job duties.</p>
Direct Threat	<p>A significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by a reasonable accommodation. To determine if there is a direct threat, there must be an individualized assessment of the person’s present ability to safely perform the essential functions of the job.</p>

Requests for Accommodation Process³

Requests for a reasonable accommodation are always initiated by the applicant or the apprentice.

³ This section summarizes EEOC Notice Number 915.002 of October 17, 2002. <https://www.eeoc.gov/laws/guidance/enforcement-guidance-reasonable-accommodation-and-undue-hardship-under-ada>

Program staff should never use the Invitation to Self-Identify as an Individual with a Disability to initiate a conversation with an applicant or apprentice about their disclosed disability. This form is for recordkeeping and utilization analysis only.

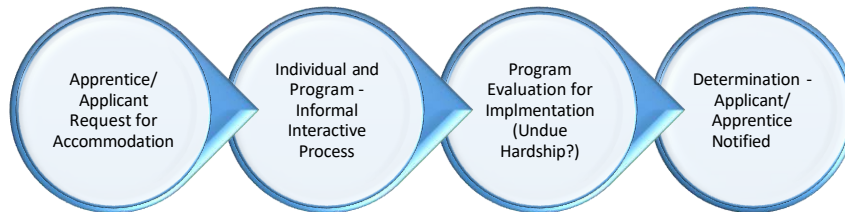
An applicant or apprentice that determines they need to request an accommodation must let the program or training agent know they need an adjustment or change at work for a reason related to a medical condition. The applicant or apprentice may use plain language to make this request – they do not need to use the phrase “reasonable accommodation” or mention the Americans with Disability Act. Additionally, requests for reasonable accommodation do not need to be in writing. Individuals may request accommodations in conversation or may use any other mode of communication. Programs may ask the individual to fill out a form or submit the request in written form, but the employer cannot ignore the initial request.

Best Practice

Upon receiving a request for reasonable accommodation, whether verbally or in writing, program staff should write a memorandum or letter confirming the individual's request.

An employer also may request reasonable documentation that the applicant or apprentice has an ADA disability and needs a reasonable accommodation.

The illustration below summarizes the process of receiving and evaluating requests for reasonable accommodation.



Applicants and apprentices may request a reasonable accommodation at any time during the application process or during the period of apprenticeship program. Designated program staff and the individual with a disability should engage in an informal process to clarify what they need and identify the appropriate reasonable accommodation. The designated program staff may ask the apprentice/applicant relevant questions that will help to make an informed decision about the request. This includes asking what type of reasonable accommodation is needed.

The program and training agent have the obligation to re-engage in the interactive process if there is a change in disability condition, the accommodation is not working, or if the apprentice requests a change in the accommodation.

When the disability and/or the need for accommodation is not obvious, program staff may ask the applicant/apprentice for reasonable documentation about their disability and functional limitations. The

program is entitled to know that the individual has a covered disability for which they need a reasonable accommodation. This request can only include information relevant to establish that the applicant/apprentice has a disability that necessitates a reasonable accommodation and does not permit access to their entire medical record.

After the program has evaluated documentation and engaged in the interactive process, they can then determine what steps are necessary to implement the accommodation. If, during the evaluation and interactive process, the program determines that implementing the accommodation would pose an undue hardship the program should document how this finding was arrived at. Programs must notify applicants/apprentices about whether the accommodation will be implemented and how it will be applied.

Interviewers should be careful not to ask any follow-up questions if an applicant makes a disclosure that they have a disability during an interview as part of the process of becoming an apprentice. The interviewee has the right to mention such information about themselves. However, interviewers should gently move on to the next prepared question. Programs should include training for interviewers about civil rights laws as they relate to disabilities.

4.4 Additional Disability Resources

This section includes information for programs about language and terminology and other materials to assist programs in working with individuals with disabilities.

Language

Programs are encouraged to use person-centered language, such as “person with a disability” rather than “disabled person.” This puts the emphasis on the individual rather than labeling someone.

Language and terminology change as society evolves. It is important to avoid terms that are outdated and/or offensive. Terms like “handicapped,” which was once the widely accepted way to refer to an individual with a disability, are now considered outdated and should not be used.

The Center for Disease Control has developed a guide for using person-centered language that includes terms that are no longer used or that are considered offensive. This guide can be found here:

<https://www.cdc.gov/ncbddd/disabilityandhealth/materials/factsheets/fs-communicating-with-people.html>.

Apprenticeship Specific Information

The US Department of Labor’s Office of Disability Employment Policy has a variety of toolkits and advisories specific to apprenticeship.

Apprenticeship and Disabilities - <https://www.dol.gov/agencies/odep/program-areas/apprenticeship>.

USDOL also has pages devoted to the subjects of “Stay at Work” and “Return to Work,” which are a part of disability rights related to existing apprentices. This can provide important information for retention efforts. <https://www.dol.gov/agencies/odep/initiatives/saw-rtw/research-pubs>

Oregon Resources

The BOLI Civil Rights Division provides information about Disability Rights in Oregon:

<https://www.oregon.gov/boli/civil-rights/Pages/disability-rights.aspx>.

BOLI’s Technical Assistance for Employers unit can help programs and training agents with avoiding making missteps when evaluating requests for accommodation or other disability related questions:

BOLI_TAFrontDesk@boli.oregon.gov.

Veterans with Disabilities

Veterans and Servicemembers may receive Veteran Readiness and Employment (VR&E) (Formerly known as Vocational Rehabilitation and Employment) services to help with job training, employment accommodations, resume development, and job seeking skills coaching. See this national resource:

<https://www.benefits.va.gov/vocrehab/>. Disability Rights Oregon provides a variety of links for veterans with disabilities here: <https://www.droregon.org/veterans>

Construction Workers, Pain, Mental Health, and Suicide Prevention

Registered apprenticeship is a common pathway for individuals entering skilled construction work. Numerous recent studies, articles and advisories have focused on mental health needs among construction workers, some of which is also related to pain management.

Construction work and mental health problems (often related to pain):

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3795897/>

Article in contractor magazine: <https://www.constructormagazine.com/construction-industry-needs-to-make-supporting-workers-mental-health-a-top-priority/>

NCCER on mental health: <https://www.nccer.org/news-research/newsroom/blogpost/breaking-ground-the-nccer-blog/2019/10/10/how-to-support-mental-health-in-the-construction-workforce>

Harvard study: <https://www.hsph.harvard.edu/news/features/construction-workers-struggle-with-pain-stress-from-injuries/>

From Big Rentz: <https://www.bigrentz.com/blog/mental-health-in-construction>

Pregnancy

The EEOC (see <https://www.eeoc.gov/laws/guidance/fact-sheet-small-businesses-pregnancy-discrimination>) provides the following information about the Pregnancy Discrimination Act (PDA):

*The PDA requires that a covered employer treat women affected by **pregnancy, childbirth, or related medical conditions** in the **same** manner as other applicants or employees who are **similar in their ability or inability to work**. The PDA covers all aspects of employment, including firing, hiring, promotions, and fringe benefits (such as leave and health insurance benefits). Pregnant workers are protected from discrimination based on current pregnancy, past pregnancy, and potential pregnancy.*

The EEOC also advises small employers as follows on the subject of pregnancy and the ADA:

Although pregnancy itself is not a disability, pregnant workers may have impairments related to their pregnancies that qualify as disabilities under the ADA. Amendments to the ADA made in 2008 make it much easier than it used to be to show that an impairment is a disability. A number of pregnancy-related impairments are likely to be disabilities, even though they are temporary, such as pregnancy-related carpal tunnel syndrome, gestational diabetes, pregnancy-related sciatica, and preeclampsia.

An employer may not discriminate against an individual whose pregnancy-related impairment is a disability under the ADA and must provide an individual with a reasonable accommodation if needed because of a pregnancy-related disability, unless the accommodation would result in significant difficulty or expense ("undue hardship").

There are other laws that apply regarding pregnancy and employment, including federal and state laws governing leaves and breaks. A Better Balance provides a website called *Baby Gate* that includes information specific to Oregon (<https://babygate.abetterbalance.org/oregon/>) on the topics of Pregnancy, Pregnancy Loss, Leaving Work for Childbirth & Bonding, and Returning to Work: Recovery, Nursing, and Sick Time.

Individuals with Learning Disabilities

Registered apprenticeship incorporates related classroom instruction as well as work-based learning. Programs need to be aware of how disabilities are understood within the educational environment as well as the workplace.

Learning disabilities range in severity and may interfere with the acquisition and development of one or more of the following:

- oral language (e.g., listening, speaking, understanding);
- reading (e.g., phonetic knowledge, decoding, reading fluency, word recognition, and comprehension);
- written language (e.g., spelling, writing fluency, and written expression); and
- mathematics (e.g., number sense, computation, math fact fluency, and problem solving).

Learning disabilities often run in families. They should not be confused with other disabilities such as intellectual disabilities, autism, deafness, blindness, and behavioral disorders. None of these conditions are learning disabilities. Because learning disabilities cannot be seen, they often go undetected. Recognizing a learning disability is even more difficult because the severity and characteristics vary.

Understanding learning disabilities: <https://ldaamerica.org/support/new-to-ld/>.

Understanding the difference between learning disabilities and intellectual disabilities: <https://www.understood.org/articles/en/whats-the-difference-between-learning-disabilities-and-intellectual-disabilities>.

Individuals with Attention Deficit Disorder (ADD) and Attention Deficit and Hyperactive Disorder (ADHD)

Individuals with Attention Deficit Disorder (ADD) or Attention Deficit and Hyperactive Disorder (ADHD) may have difficulty focusing, which can be a challenge in managing their work and schooling. However, they can also be drawn to work that is fast paced and varied, which sometimes makes individuals with these conditions drawn to traditional apprenticeable occupations like construction, and to prefer learning styles that emphasize the applied rather than theoretical aspects of a subject. Below are some articles about ADD and ADHD related to construction specifically and to work more generally:

ADD in construction: <https://www.forconstructionpros.com/business/business-services/article/12134618/leading-the-add-construction-employee>.

Advantage of trades for individuals with ADHD: <https://chadd.org/attention-article/training-in-the-trades/>.

ADHD resources for workers: <https://lifehacker.com/how-to-manage-your-adhd-while-at-work-1832374499>.

ADHD and work: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3599848/>

Individuals on the Autism Spectrum

Autism is a neurological developmental disability, and individuals who are diagnosed with autism are said to be “on the Autism Spectrum” or sometimes more briefly as “on the Spectrum.” Individuals who are on the Spectrum may refer to themselves as being “neurodivergent” (or collectively as “neurodiverse”) and to individuals who are not on the Spectrum as being “neurotypical.”

It is estimated that one to two percent (1-2%) of the population in the United States and worldwide has autism. Individuals with autism are diverse. Accordingly, the way an individual experiences the symptoms of autism, and the kinds of supports and services an individual needs can vary widely.

Individuals on the Spectrum commonly have some combination of neurodiverse (or atypical) traits related to:

- language and communication,
- social interaction,
- motor coordination,
- sensory processing, and
- executive functioning.

The Office of Disability Employment Policy (ODEP) reports:

Americans on the autism spectrum experience substantial challenges to attaining competitive integrated employment opportunities that match their interests, gifts, and talents. They experience substantial unemployment and underemployment, according to the research literature. Adults and youth on the autism spectrum also experience barriers to completing postsecondary education and training opportunities, accessing healthcare, and attaining integrating community living.

Resources that can help employers and others support employees on the autism spectrum include those listed on the ODEP’s website: <https://www.dol.gov/agencies/odep/program-areas/autism>

Section 5: Targeted Outreach, Recruitment and Retention Plan

The Targeted Outreach, Recruitment, and Retention (Targeted Plan) plan is a tool used that can help programs diversify and provide equitable access and retention for applicants and apprentices. In the Targeted Plan, programs undertake targeted outreach, recruitment, and retention activities that are likely to generate an increase in applications for apprenticeship and improve retention of apprentices that have been traditionally underrepresented in apprenticeships. A copy of the new Targeted Plan template is in Appendix F of this guide.

The Targeted Plan will look familiar to many programs. It is similar to what was formerly called the Affirmative Action Work Plan. The Targeted Plan includes many of the elements that were a part of the Affirmative Action Work Plan but has been updated to include the geographical jurisdictions for each standard in the program and newly required recruitment activities related to the program's Recruitment Source List. There are also some minor changes to the activity descriptions to provide clarity, but the content and purpose for those sections will remain the same.

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...the Sponsor must undertake targeted outreach, recruitment, and retention activities that are likely to generate an increase in applications for apprenticeship and improve retention of apprentices from the targeted group or groups and/or from individuals with disabilities, as appropriate. In furtherance of this requirement, the Sponsor must:

- i) Set forth in its written affirmative action plan the specific targeted outreach, recruitment, and retention activities it plans to take for the upcoming program year....
- ii) Evaluate and document after every selection cycle for registering apprentices the overall effectiveness of such activities;
- iii) Refine its targeted outreach, recruitment, and retention activities as needed; and
- iv) Maintain records of its targeted outreach, recruitment, and retention activities and records related to its evaluation of these activities.

5.2 Developing the Targeted Plan

The Division's Equal Employment Opportunity Team can help provide ideas for establishing strategies that will be effective for programs in developing their Target Plan.

One strategy that can be effective for developing steps in the plan is to set **specific, measurable, achievable, relevant, time-based**, or SMART, goals for each step. SMART

- **Specific:** Clearly defined. In the example of a Targeted Plan, this would mean that the step has an action and/or contact source.

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- **Measurable:** How can progress be measured towards completing the step. For example, sending in an opening announcement to the program’s Recruitment Source List (see section 5.2) twice a year.
- **Achievable:** Something that can be accomplished within the year of the Plan.
- **Relevant:** Appropriate to reaching and retaining the targeted population for race, sex, ethnicity, and disability.
- **Time-bound:** A target date to complete each step in the Targeted Plan.

The method a program chooses should be a defined strategy for attracting, hiring, onboarding, and retaining a targeted population of people from traditionally underrepresented groups in apprenticeship with the aim of helping the program reach their Utilization Goals for Race, Sex, and Ethnicity and the federally established Utilization Goal for Disability that is currently set at 7%.

Programs in the industrial, utility, and emerging trades that are newly eligible to participate in the Targeted Plan should reach out to the human resources department of their training agents because they may already be performing targeted outreach, recruitment, and retention activities that can be used in the program’s Targeted Plan.

Recruitment

The first section of the Targeted Plan is where recruitment activities will be documented. These activities are undertaken to produce applications to the program for the current open cycle while attracting suitable candidates from targeted groups. The easiest explanation for this section is that it is related to where programs post and advertise active recruitments and opening announcements to reach applicants within the program’s recruitment area.

Example: Recruitment Steps

Recruitment Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Advertise Openings:					
1.	Required Activity: Develop and update annually a list of current Recruitment Sources that will generate referrals from all demographic groups within the relevant Recruitment area.	Designated EEO Authority	April 30, 2022		
2.	Required Activity: Provide Recruitment Sources advance notice, preferably 30 days, of apprenticeship openings so that the recruitment sources can notify and refer candidates.	Designated EEO Authority	May 9, 2022 & Oct. 3, 2022		

3.	Post opening announcement on Indeed	Designated EEO Authority	April & Sept. 2022		
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Outreach

Outreach activities are the efforts the program makes to partner and present information to other organizations, groups, specific audiences, or the public. Outreach activities should lead to increased applications from underrepresented groups for any currently or *future* opening announcements.

Outreach Steps for Disseminating Information

The Outreach activities on the Targeted Plan should provide information to organizations serving underutilized groups regarding the nature of apprenticeship, requirements for selection for apprenticeship, availability of apprenticeship opportunities, and include the equal opportunity pledge that is required for programs. These organizations may include community-based organizations, local high schools, local community colleges, local vocational, career and technical schools, and local workforce system partners including One Stop Career Centers such as WorkSource Oregon.

Example: Outreach Steps

	Outreach Activity: Specific Steps Taken to Disseminate Information:	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.	Lead info sessions for women’s advocacy organizations: <ul style="list-style-type: none"> • Womanspace • Center for Women’s Leaderships • General Federation of Women’s Clubs 	Designated EEO Authority & Training Agent or Journey Worker	3x a year		
2.	Send program fliers to Vocational Rehabilitation office in Medford, Klamath Falls, Coos Bay, and Florence	Designated Coordinator	September		

Working with School Boards and Vocational Education Systems

The Outreach section of the Targeted plan should also demonstrate how the program will cooperate with local school boards and vocational education systems to develop and/or establish relationships with pre-apprenticeship programs targeting students from underutilized groups to prepare them to meet the standards and criteria required to qualify for entry into apprenticeship programs.

Example: Outreach Step for Working with School Boards and Vocational Education Systems

Outreach Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Work with School Boards and Vocational Education Systems:					
1.	Host presentation of common tools of the trade to North High School juniors and seniors	Training Agents and Journey Workers	2x a year		
2.	Lead virtual presentations to Blue Mountain Community College career exploration classes	EEO Authority	4 times per quarter		

Establish Links with Community-Based Organizations

Another required Outreach section of the Targeted Plan asks that programs establish partnerships enlisting the assistance and support of pre-apprenticeship programs, community-based organizations, advocacy organizations, or other appropriate organizations, in recruiting qualified individuals for apprenticeship.

Example: Outreach Steps for Establishing Links with Community-Based Organizations

Outreach Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Establish Link with Community Organizations:					
1.	Lead Native American Youth and Family Center Presentation Sessions	Designated EEO Authority & One Journey Worker Each Session	2x a year		
2.	Oregon Trades Women Career Fair	Designated Coordinator / Training Agents	May 13 th and 14 th 2022		

Retention

The Retention section is where programs list the practices to retain targeted populations and [maintain](#) a working [environment](#) which supports [current](#) apprentices in the program. This includes committee retention policies aimed at addressing the various needs of apprentices with the goal of enhancing their [job satisfaction](#) and reducing the [substantial costs](#) involved in hiring and [training](#) new apprentices.

Best Practices:

- Enlisting the use of journey workers from the underutilized group or groups to assist in the implementation of the program’s affirmative action program

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- Enlisting the use of journey workers from the underutilized group or groups to mentor apprentices and to assist with the program’s targeted outreach and recruitment activities and
- Conducting exit interviews of each apprentice who leaves the program’s apprenticeship program due to cancelation, termination, or transfer to understand better why the apprentice is leaving the program and to help shape the retention activities.

Example:

Retention Activities	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1. Utilize current apprentice workforce for female and minority support	Training Agents	On Going		
2. Offer apprentice awards (Grades / Attendance) or incentives	Committee	December		
3. Conduct exit interviews	EEO Authority	On Going		

Evaluation and Recordkeeping

Programs should begin building the next year’s Targeted Plan based on the successes and challenges in the current plan to refine its targeted outreach, recruitment, and retention activities as needed. It is important to record activity progress and complete sections throughout the year as they are accomplished in order to improve upon current efforts.

Programs are also required to:

- Evaluate and document, after every selection cycle for registering apprentices, the overall effectiveness of such activities.
- Refine its targeted outreach, recruitment, and retention activities as needed; and
- Maintain records of its targeted outreach, recruitment, and retention activities and records related to its evaluation of these activities.

Completion of Activities

Completed Targeted Plan for the year are due annually to the Division. The completed plan must include the dates tasks were completed with detailed Results and Comments recorded after performing each step. Detailed results may include:

- The total number of people in attendance at events, the number of applications received from a recruitment source, and any connections made because of the activity.
- The race, sex, and ethnicity of applicants that result from recruitment activities—this will inform you if the activity is contributing to your goal of reaching a targeted population.

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- Conclusions that the step was not beneficial for your Targeted Plan and your intent to remove the step in subsequent years.

Example:

Recruitment Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Advertise Openings:					
1.	Required Activity: Develop and update annually a list of current Recruitment Sources that will generate referrals from all demographic groups within the relevant Recruitment area.	Designated EEO Authority	April 30th, 2021	March 11th, 2021	Reviewed and updated
2.	Post opening announcement on Indeed	Designated EEO Authority	April & Sept. 2021	April 4th and Sept. 5th	23 applications total- 6 female 2 African American 5 Latinx 1 Pacific Islander
Outreach Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Disseminate Information:					
1.	Info sessions for women’s advocacy organizations: <ul style="list-style-type: none"> • Womanspace • Center for Women’s Leaderships • General Federation of Women’s Clubs 	Designated EEO Authority & Training Agent or Journey Worker	3x a year	March 2nd, June 9th, and September 5th 2021	Presented to a total of 112 women
Outreach Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Work with School Boards and Vocational Education Systems:					
1.	North High School Career Fair	Designated EEO Authority	March 3rd,	March 3rd	Hosted table at career fair. 130

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		& Training Coordinator	2021	2021	students attended, 8 student referrals from event including 2 BIPOC and 2 female
Outreach Activity:		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
Specific Steps Taken to Establish Link with Community Organizations:					
1.	Native American Youth and Family Center Presentation Sessions	Designated EEO Authority & One Journey Worker Each Session	2x a year	June 19th 2021 & Oct. 25th 2021	Presented Apprenticeship Opportunities to 75 attendees
Retention Activities		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.	Utilize current apprentice workforce for female and minority support: Enlist the use of journey workers from the underutilized group or groups to mentor apprentices.	Designated EEO Authority Organizes, Training Agents Lead	On going	December 15th, 2021	2 BIPOC mentors & 4 female mentors connected to apprentices

5.2 Recruitment Source List

One new element required under the Oregon Plan is the development and utilization of a Recruitment Source List. For this tool, programs will need to develop and annually update a list of current recruitment sources that will generate referrals from all demographic groups within the program’s recruitment area. Examples of recruitment sources include: WorkSource Oregon’s One-Stop Career Centers and local workforce investment boards, community-based organizations, community colleges, vocational, career and technical schools, pre-apprenticeship programs, and federally funded, youth job-training programs such as Job Corps. The List should include any organization that the program currently sends or plans to send opening announcements to during the upcoming year.

The Recruitment Source List should specifically include sources that reach underutilized demographics. In general, local high schools are considered valuable sources as their populations are usually reflective of the community. Some examples are provided on the template sample below. Note that sources will vary based on region.

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Annual Recruitment Source List : Update and submit annually with Targeted Plan					
Source Name	Contact Person at Source	Mailing Address	Email Address	Opening Announcement Sent Date	Date: Information Updated
Examples:					
WorkSource Oregon Local Offices					
GED Testing Centers					
Career-Tech Programs					
Pre-apprenticeship Programs					
Job Corps					
Vocational Rehabilitation Counselors					
Youthbuild Program					
College Financial Aid Offices					
Community-based Organizations					
Local High School Career Counselors					
Workforce Investment Boards					
Community Colleges					
Chamber of Commerce					
Trade or Industry Groups					

The Division will provide an Annual Recruitment Source List template (pictured above) to programs upon request. However, programs can use whichever template they prefer if it includes all the requirements listed in this section.

Purpose, Information Required, And Use of the Annual Recruitment Source List

Purpose of Recruitment Source List:

- Recruitment sources are specifically selected to reach underrepresented populations and receive applications for current apprenticeship openings.

What Should be Included:

- Each recruitment source should contain the source, a contact person that represents the source, mailing address, email address, the date the opening announcement was sent and the date which the information for the contact was updated.

Use:

- Provide an opening announcement to each source preferably 30 days in advance. If the program is open continuously, provide the opening announcement approximately every six months. The Recruitment Source List is to be updated annually and submitted along with the annual Targeted Plan.

Recordkeeping Requirements

Tracking Activities on Recruitment Source List

- During the application process, it is a best practice to provide the applicant a place to explain where they heard about the program and opening announcement. Track the information in the Recruitment Source List. If a source is determined to be beneficial, then it should be a retained source and activity. Sources that are not initially beneficial are not as easy to determine as they may have benefits, but none that are immediately identifiable. Those that are not beneficial should be removed. Even activities that were not initially beneficial should be recycled occasionally. Just because it did not work once, does not mean it will never work.

Tracking Recruitment Source List Activities on the Targeted Plan

- There are two steps related to the Recruitment Source List now required in the Targeted Plan.

New Recruitment Activities - Specific Steps Taken to Advertise Openings:

1. Required Activity: Develop and update annually a list of current Recruitment Sources that will generate referrals from all demographic groups within the relevant Recruitment area.
2. Required Activity: Provide Recruitment Sources advance notice, preferably 30 days, of apprenticeship openings so that the recruitment sources can notify and refer candidates.

As with the other sections of the Targeted Plan, programs should ensure that they have tracked the date the Recruitment Source List Activities were completed as well as any comments regarding the list.

5.3 Affirmative Action Program: Additional Elements

Three other updates to the Oregon Plan include assigning the person responsible for Equal Employment Opportunity within each program; posting and publishing the updated pledge for Equal Employment Opportunity; and posting the Equal Opportunity Statement. These requirements are addressed below.

Assignment of program EEO Authority

Each registered apprenticeship program must assign one person as the designated EEO Authority for their program. This person can be a program's apprenticeship coordinator or other individual(s) that have the resources, support, and access to the program leadership to ensure effective implementation.

According to the Oregon Plan Section 3 Part C, the EEO Authority's duties shall include:

- Monitoring all registered apprenticeship activity to ensure compliance with the nondiscrimination and affirmative action obligations required by the Oregon Plan
- Maintaining the EEO records required
- Generating and submitting reports as may be required by the Division

To Designate the EEO Authority:

The assignment of the EEO Authority needs to occur by a committee vote. After the vote, programs must upload the minutes showing a Motion/Second/Carried vote designating the EEO Authority, along with their contact information, to OATS. EEO Authorities can be changed in OATS using the same methods as adding and removing committee members.

Updated EEO Pledge to Accompany Opening Announcements

Another update that occurred with the Oregon Plan was the drafting of the new *EEO Pledge*. This pledge must be included on all apprenticeship opening announcements and publications, such as apprentice and employee handbooks, policy manuals, and newsletters. This includes when announcements are

disseminated to the sources on the required Recruitment Source List, when they are posted online, printed out and displayed, or publicized in any other format.

The required pledge language is as follows:

[Name of Program] shall not discriminate against apprenticeship applicants or apprentices based on race, color, religion, national origin, sex (including pregnancy and gender identity), sexual orientation, genetic information, or because they are an individual with a disability or a person 18 years old or older. [Name of Program] shall take affirmative action to provide equal opportunity in apprenticeship and shall operate the apprenticeship program as required under this Plan and Title 29 CFR, part 30.

The Division has sent a poster containing the language of the EEO Pledge to all programs eligible for EEO. Copies of the poster are also available to print from the Apprenticeship & Training Division website.

Updated Right to EEO & Complaint Statement

In addition to the EEO Pledge, programs will need to include the new *Right to Equal Opportunity* statement on program application materials. This statement must also be prominently displayed in a public location where all apprentices will see the notice.

The required Right to Equal Opportunity statement is as follows:

(1) Your Right to Equal Opportunity

(2) It is against the law for a Sponsor of an apprenticeship program registered for Federal purposes to discriminate against an apprenticeship applicant or apprentice based on race, color, religion, national origin, sex, sexual orientation, age (18 years or older), genetic information, or disability. The Sponsor must ensure equal opportunity with regard to all terms, conditions, and privileges associated with apprenticeship. If you think that you have been subjected to discrimination, you may file a complaint within 300 days from the date of the alleged discrimination or failure to follow the equal opportunity standards with Oregon Bureau of Labor and Industries, 800 NE Oregon Street, Suite 1045, Portland, OR 97232. You may also be able to file complaints directly with the EEOC, or State fair employment practices agency at the above location.

(3) Each complaint filed must be made in writing and include the following information:

- (a) Complainant's name, address and telephone number, or other means for contacting the complainant;
- (b) The identity of the respondent (i.e. the name, address, and telephone number of the individual or entity that the complainant alleges is responsible for the discrimination);
- (c) A short description of the events that the complainant believes were discriminatory, including but not limited to when the events took place, what occurred, and why the complainant believes the actions were discriminatory (for example, because of his/her race, color, religion, sex, sexual orientation, national origin, age (18 or older), genetic information, or disability);

(d) The complainant's signature or the signature of the complainant's authorized representative.

The EEO Pledge poster referenced in the previous section also includes the required language in the Right to Equal Opportunity state. The posters have been sent to all programs and copies are available to print from the Apprenticeship & Training Division [website](#).

Section 5: Compliance Timeline and Requirements

The Oregon Plan for Equal Employment Opportunity in Apprenticeship (Oregon Plan) will be published on November 1, 2021. After that, existing apprenticeship programs and the Division have 180 days to come into compliance with all elements of the Oregon Plan. This means that everything must be in place by April 30, 2022.

New programs that are registered after the Oregon State Apprenticeship and Training Council's fourth quarter, 2021 meeting, must have comply with all sections of the Oregon Plan no later than two years after the date of their registration.

Initial Compliance Assessment

The Division is required to ensure that programs understand the foundational requirements of the Oregon Plan. This will require programs to submit the required components by the April 30, 2022 compliance deadline.

The Division's first compliance assessment will occur after programs have submitted all the below items due April 30, 2022. The outcome of this initial assessment will not result in punitive actions for non-compliance but will be used as an opportunity to provide technical assistance for programs that may be struggling with meeting the requirements of the Oregon Plan. Our Equal Employment Opportunity Team will provide coaching where modifications or improvements should be made. Non-submittal of documents by the April 30, deadline is discussed in the Enforcement section below.

EEO Items Due April 30, 2022

The following documents will be due prior to the April 30, 2022 deadline:

- Anti-Harassment Training Materials
 - The training itself and supporting materials
- Disability Apprentice Workforce Analysis Workbook (Division template) *or* the Worksheet of Data for Disability Tracking (Program created)
- Apprentice Selection Tracking Sheet for 2021
 - Programs will be able to turn in the selection data tracking worksheet previously used in past years, where racial groups were combined as "minority" registrations
 - Starting in 2022, so due in 2023, programs must transition to the new form—a copy of the form can be found in the back of this guide
- *If Due for 2022-24-* Utilization Goals for Race, Sex, and Ethnicity
- Minutes showing vote on the above Equal Employment Opportunity materials

Programs Newly Eligible for EEO

A major update in the Oregon Plan requires all programs to participate in EEO activities if they have five or more apprentices registered to their program. There will no longer be exemptions for performing EEO activities for industrial, utility, and emerging trade apprenticeship programs or programs with multiple standards that have less than five apprentices.

All programs that have five or more apprentices total, regardless of whether they are industrial, fixed site, or in emerging occupations, must meet perform EEO requirements.

Enforcement

Programs that fail to implement the components of the Oregon Plan listed above by the April 30, 2022, deadline shall be subject to an enforcement action. These actions can include suspension of rights to register new apprentices, suspension of the program, deregistration of the program, referral to the Equal Employment Opportunity Commission, referral to the Civil Rights Division of the Oregon Bureau of Labor and Industries, and/or referral to the Office of Federal Contract Compliance Programs.

Section 5.1: Annual Recordkeeping and Submission Requirements after the Roll Out of the Oregon Plan

After the April 30, 2022 implementation and initial document submission, programs must submit a portion of the EEO materials to the Division on an annual basis. The submission deadlines for your materials are dependent on the submission schedule chosen by your program:

- *Calendar*: activities that will be performed January 1 to December 31
 - **Due on or before January 31 of the new Targeted Plan year**
- *Fiscal*: activities that will be performed July 1 to June 30 of the following year
 - **Due on or before July 31 of the new Targeted Plan year**

Please contact the Division’s Equal Employment Opportunity team immediately at General.ATD@boli.oregon.gov if you wish to change the timeframe of your Plan year.

Documents Submitted Annually to the Division	
Targeted Outreach, Recruitment, and Retention Plan (Targeted Plan)	<ul style="list-style-type: none">• Targeted Plan for the upcoming year<ul style="list-style-type: none">○ Required template provided by the Division• Targeted Plan for the completed year to include the date the activities were completed and the results of the activities• Recruitment Source List<ul style="list-style-type: none">○ Sample worksheet available from the Division

Documents Submitted Annually to the Division	
Personnel Process Review	<ul style="list-style-type: none"> • Annually completed review of personnel processes <ul style="list-style-type: none"> ○ Required template provided by the Division
Affirmative Action Program	<ul style="list-style-type: none"> • Apprentice Selection Data tracking worksheet(s) <ul style="list-style-type: none"> ○ Required worksheet(s) will be provided by the Division
Minutes	<ul style="list-style-type: none"> • Minutes showing program vote for approval of: <ul style="list-style-type: none"> ○ Targeted Outreach, Recruitment, and Retention Plan for upcoming year ○ Approval of Personnel Processes Review

Utilization Goals Set to Expire Prior to Scheduled Compliance Reviews

Please note, that if a program’s Utilization Goals for Race, Sex, and Ethnicity are due for 2023-2025 or 2024-26, and you do not have your EEO Compliance Review scheduled before that time, then you will be required to submit Utilization Goals for Race, Sex, and Ethnicity as outlined in the training guide for that subject.

Section 6: Equal Employment Opportunity Compliance Reviews

Equal Employment Opportunity (EEO) Compliance Reviews, formerly known as Affirmative Action Compliance Reviews, will include a review of all the materials required in the Oregon Plan. You can view a copy of the EEO Compliance Review Report template in Appendix G.

EEO Compliance Reviews will no longer occur on an annual basis. Starting in 2022, EEO Reviews will be performed at the same time as Program Operation Quality Assurance Assessments.

The schedule for those reviews will occur:

- Annually for new programs for their first three years of operation (the probationary period for new programs).
- Once every three years for programs that are in compliance and have been established for over three years; *or*
- Annually for programs that have been found out of compliance for EEO at the time of their most recent Review.

The Division will provide programs with a 30-day notice prior to performing a compliance review. Programs must submit the requested material on or before that date. A one-time extension of another 30 days will be granted upon request.

Programs can reach out to the Division to find out when they will be scheduled for their next EEO and Program Operation Compliance Review.

Section 6.1: EEO Compliance Review Recordkeeping and Submission Requirements

The Division will have many of the required records on file due to annual document submission requirements. Programs will be given 30 days to submit the remainder of the required components.

The below table identifies the documents that must be submitted at the time of the EEO Compliance Review.

Documents Submitted at the Time of Compliance Reviews to the Division	
Affirmative Action Program	<ul style="list-style-type: none"> • Applicant data tracking worksheet(s) or log(s) <ul style="list-style-type: none"> ○ Sample Excel worksheet available from the Division • Documents supporting selection or rejection of apprentices: Selection for apprenticeship, including applications, tests and test results, and interview notes • Copy of recruitment posting(s) with required the EEO pledge
Anti-Harassment Training	<ul style="list-style-type: none"> • Copy of anti-harassment training and training materials used • Documentation of the training being completed by apprentices, training agents, committee members, and program staff

<p>Disability</p>	<ul style="list-style-type: none"> • Copies of the invitation to disclose disability forms <ul style="list-style-type: none"> ○ Required form provided by Division • Apprentice workforce analysis <ul style="list-style-type: none"> ○ Required worksheet will be provided by the Division • Requests for reasonable accommodation
<p>Utilization Analysis</p>	<ul style="list-style-type: none"> • Workforce analysis tracking for industrial training agents that use internal pools due to the requirements of a Collective Bargaining Agreement <ul style="list-style-type: none"> ○ Required worksheet will be provided by the Division

6.2 : EEO Compliance Review Findings and Steps for Out of Compliance Findings

The Division will submit and EEO Compliance Review report to programs within 45 days of the review. The compliance ratings for EEO are: compliance, good faith compliance, and out of compliance.

If the compliance review indicates an out-of-compliance finding, the Division will inform the program of the following:

- The deficiency(ies) identified;
- How to remedy the deficiency(ies);
- The timeframe within which the deficiency(ies) must be corrected; and
- Enforcement actions that may be undertaken if compliance is not achieved within the required timeframe.

Programs found out of compliance must do the following within 30 business days of receiving the compliance report:

1. Implement a **compliance action plan**.
2. Provide the compliance action plan to the Division; or
3. Submit a written rebuttal to the findings.

A one-time extension of up to 30 days will be granted if the program can demonstrate good cause.

Compliance Action Plan

The contents of the compliance action plan must include:

- A specific commitment, in writing, to correct or remediate identified deficiency(ies) and area(s) of noncompliance;
- The precise actions to be taken for each deficiency identified;
- The time within which the cited deficiency(ies) will be remedied and any corrective program changes implemented; and
- The name of the individual(s) responsible for correcting each deficiency identified.

Compliance Enforcement

Programs that fail to respond to out of compliance findings by the time set forth in the Oregon Plan will be subject to enforcement actions. These actions can include suspension of rights to register new apprentices, suspension of the program, deregistration of the program, referral to the Equal Employment Opportunity Commission, referral to the Civil Rights Division of the Oregon Bureau of Labor and Industries, and/or referral to the Office of Federal Contract Compliance Programs.

Section 7: Affirmative Action Plan (AAP)

The term Affirmative Action Plan (AAP) will have a different meaning after the November 1, 2021 implementation of The Oregon Plan. As noted in previous sections, the document that was known as the *Affirmative Action Work Plan* under the previous regulations has been renamed *Targeted Outreach, Recruitment, and Retention Plan (Targeted Plan)*.

7.1 : Affirmative Action Plan (AAP) Contents

Under the Oregon Plan, an AAP is the entirety of the consolidated contents submitted to meet the requirements of the Oregon Plan.

The contents AAP will include:

- **Utilization Analysis and Goals for Race, Sex, and Ethnicity**
- **Disability Utilization Print Out**
- **Current Targeted Plan for Race, Sex, and Ethnicity**
- **Current Personnel Process Review**

The Division will build the program's AAP with the above content at the closing of your Equal Employment Opportunity Compliance Reviews and return the finalized document for the program to review.

Program Responsibility

Programs must vote on and submit minutes approving the contents of the consolidated Affirmative Action Plan within 90 days of its receipt from the Division. After this vote, the Division will submit the

program's Utilization Goals for Race, Sex, and Ethnicity to the Oregon State Apprenticeship and Training Council for review.

Best Practice:

Programs should review their AAP on an annual basis to evaluate the progress towards their Utilization Goals for Race, Sex, and Ethnicity and the Utilization Goal for Disabilities, which is set at 7% for all programs.

Section 8: Closing Statement

We appreciate the time you have taken to learn about the required elements of the Oregon Plan. At this point you should have all the materials that will help you complete each of the necessary components and the timeline you will be required to submit those materials. Please reach out to the Division at General.ATD@boli.oregon.gov if you are missing any of the templates or documents required.

Our Equal Employment Opportunity Team is available provide one-on-one coaching and consultation to programs to assist them in completing what is required to comply with The Oregon Plan. Please contact the EEO Team through the email listed above.

Thank you for your work to diversify apprenticeship in Oregon.

Appendix A: Annual Review of Personnel Processes Template

Annual Review of Personnel Processes

MA #: Click or tap here to enter text.

Program Name: Click or tap here to enter text.

Review Period: Click or tap here to enter text.

Completion Date: Click or tap to enter a date.

Name of Program EEO Authority: Click or tap here to enter text.

Personnel Involvement:	
Names and Titles of All Persons Involved in the Annual Personnel Processes Review:	

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
6 Outreach and Recruitment Activities: (Targeted Plan)	•	•
7 Accessibility to Individuals with Disabilities:	•	•
8 Qualifications for Apprenticeship (minimum qualifications):	•	•
9 Application and Selection of Apprentices:	•	•
10 Onboarding New Apprentices and Apprentices Returning from Extended Leaves/Suspension:	•	•
11 Handling Requests for Reasonable Accommodations	•	•
12 Wages:	•	•
13 Job Performance:	•	•
14 Advancement Opportunities:	•	•
15 Promotions (re-rates, completions):	•	•
16 Work Assignments Appropriate for Training:	•	•

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
17 Rotation Among All Work Processes:	•	•
18 Initiatives to Establish & Maintain Total Worker Health and Handling of Leave Requests	•	•
19 Initiatives to Establish & Maintain Respectful Workplaces:	•	•
20 Disciplinary Actions:	•	•
21 Handling Grievances & Complaints:	•	•

Appendix B: Example of Completed Annual Review of Personnel Processes

**Bureau of Labor and Industries
Apprenticeship and Training Division
Annual Review of Personnel Processes**

MA #: 9999

Program Name: Best Boilermaker Apprenticeship JATC

Review Period: January 2021 – December 2021

Completion Date: 3/1/2022

Name of Program EEO Authority: Antonia Marquez

Personnel Involvement:	
Names and Titles of All Persons Involved in the Annual Personnel Processes Review:	Antonia Marquez, Director of Apprenticeship Jamal Smith, Apprenticeship Coordinator Cindy Stanton, Committee Member Jon Urriba, Committee Member Paul Ng, Apprentice Jennifer LaCombe, Apprentice Casey Ellsworth, Apprentice

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
1. Outreach and Recruitment Activities: (Targeted Plan)	<ul style="list-style-type: none"> Completed previous year’s Outreach and Recruitment sections on Targeted Plan made adjustments for next year’s plan. 	<ul style="list-style-type: none"> None at this time.
2. Accessibility to Individuals with Disabilities:	<ul style="list-style-type: none"> Reviewed physical training center and written materials looking for ways to reduce barriers. Reviewed complaint received from applicant regarding access to application materials not available in large print. 	Based on applicant complaint that she was told she could not use a magnifying reader to take the Boilermaker Aptitude Assessment <ul style="list-style-type: none"> Added training section to annual anti-harassment about reasonable accommodations Provided training to administrative and instructional staff about responding to accommodation requests
3. Qualifications for Apprenticeship (minimum qualifications):	<ul style="list-style-type: none"> Looked at MQs to determine if more is being asked than necessary for entry into program. Random review of apprentice files to ensure MQ documentation is on file. 	<ul style="list-style-type: none"> None

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
4. Application and Selection of Apprentices:	<ul style="list-style-type: none"> Reviewed annual applicant selection worksheet. Reviewed ranking spreadsheet. 	<p>A review of the applicant selection worksheet for 2021 showed that BIPOC were not progressing past the interview stage of application to the ranked pool. We reviewed applicant worksheets for the 2017-2020 and found similar patterns</p> <ul style="list-style-type: none"> Reviewed interview questions with Boilermakers Minority Caucus (BMC) for bias or other content issues Implemented suggestions made by BMC New internal policy that all interview panels must be diverse and include female and BIPOC representation
5. Onboarding New Apprentices and Apprentices Returning from Extended Leaves/Suspension:	<ul style="list-style-type: none"> Reviewed random sample of apprentice files to ensure that signed receipt of Policy and Procedure are on file. Reviewed onboarding processes to ensure apprentices are aware of requirements of apprenticeship. 	<ul style="list-style-type: none"> None
6. Handling Requests for Reasonable Accommodations	<ul style="list-style-type: none"> Reviewed 2021 requests for accommodations. We received 1 request in 2021, which was granted. 	<ul style="list-style-type: none"> The request for accommodation the program received in 2021 was not a challenge for our program. However, in responding to the request showed that we didn't have a clear process for what to do when a request is made and who evaluates requests. We now have a written procedure that has been disseminated to all program staff and registered training agents.
7. Wages:	<ul style="list-style-type: none"> Ensured wages are current and filed with BOLI ATD. 	<ul style="list-style-type: none"> None
8. Job Performance:	<ul style="list-style-type: none"> Ensured no apprentices overdue for semi-annual review. 	<ul style="list-style-type: none"> None

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
9. Advancement Opportunities:	<ul style="list-style-type: none"> Reviewed apprentices held for a year or more to look for different impact on women, BIPOC and/or persons with disabilities. Reviewed retention activities in Targeted Plan – do they have mentorship? Are activities working? 	<ul style="list-style-type: none"> We did not find unequal impact in this area. However, we found that there were more apprentices held for related training grades than we would like and that many of these holds were for the same RT class. We have implemented drop in tutoring hours throughout the week in subject areas that have been more challenging for apprentices. We will continue to evaluate these efforts and make adjustments as needed.
10. Promotions (re-rates, completions):	<ul style="list-style-type: none"> Looked at cohort of apprentices registered in 2017 to evaluate completion and cancellation rates for different impact on women, BIPOC, and/or persons with disabilities. 	<ul style="list-style-type: none"> Our program continues to see increases in minority enrollment. However, minorities aren't completing at the same rate. We have consulted with the Boilermakers Minority Caucus about starting an affinity group for minorities in our program. We have also reached out to other local programs with affinity groups in their training programs to assist with this effort. Goal is to have affinity group for BIPOC apprentices by end of 2022.
11. Work Assignments Appropriate for Training:	<ul style="list-style-type: none"> Conducted random selection of 6th term apprentice MPRs (12 female, 12 BIPOC, 12 white male, 12 self-identified individuals with disabilities) to review work processes in relation to apprenticeship term for disparities. Interviewed random selection of 4th term apprentices to ask about work processes and expectations for their current term. 	<ul style="list-style-type: none"> Our interviews with 4th term apprentices indicated that female identified apprentices felt they were being moved too often to help employers meet diversity requirements. Some reported feeling like each move made them feel like they were starting over doing more menial tasks and weren't able to develop relationships with new crews before moving again. Our program staff and committee are currently reviewing our rotation and dispatch processes and plan to implement new policies in 2022.

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
12. Rotation Among All Work Processes:	<ul style="list-style-type: none"> As part of review in item 11 above, reviewed files to ensure all 6th term apprentices had received training in 75% of work processes. 	<ul style="list-style-type: none"> None
13. Initiatives to Establish & Maintain Total Worker Health and Handling of Leave Requests	<ul style="list-style-type: none"> Reviewed general health and welfare trainings offered to promote apprentice well-being. Reviewed all leave requests for 2021 to ensure that leaves for mental and emotional health were being granted in the same manner that requests for physical conditions were being granted. 	<ul style="list-style-type: none"> Our program currently offers nutrition and financial wellness courses to all apprentices. We are currently implementing suicide awareness training developed specifically for the construction industry that will be free to all apprentices. Posted crisis hotline numbers in all public gathering areas of training center.
14. Initiatives to Establish & Maintain Respectful Workplaces:	<ul style="list-style-type: none"> Performed physical walkthrough of training center to ensure EEO posters are up in multiple areas. Conducted EEO orientation for all new program staff and participants held quarterly. Provided EEO periodic info sessions offered for existing staff March 17, 2021, August 18, 2021. 	<ul style="list-style-type: none"> None
15. Disciplinary Actions:	<ul style="list-style-type: none"> Reviewed Policy and Procedures manual to ensure disciplinary policy is documented and easy to locate. Reviewed notices to appear and disciplinary terminations for all apprentices in 2021. Looked at outcomes to ensure that disciplinary actions were applied equally for similar infractions. 	<ul style="list-style-type: none"> None

Annual Review of Personnel Processes		
Required Element	Description of Review Please include specific elements of how you reviewed each required item	Program Modifications List any modifications you made, or are making, as a result of this review. May include changes to Policies and Procedures, standards, practices, etc.
16. Handling Grievances & Complaints:	<ul style="list-style-type: none"> Reviewed complaints received in 2021 to ensure apprentices making potential discrimination complaints were provided with correct referral information. 	<ul style="list-style-type: none"> None

Appendix C – Template for Utilization Goals for Race, Sex, and Ethnicity for standards with 11 or more apprentices

Occupation or Program apprentice composition as of [Current Date]:

Percentage of Black or African American:	% (of	apprentices)
Percentage of American Indian or Alaskan Native:	% (of	apprentices)
Percentage of Asian:	% (of	apprentices)
Percentage of Native Hawaiian or Pacific Islander:	% (of	apprentices)
Percentage of Hispanic or Latinx (all races):	% (of	apprentices)
Percentage of female and non-binary:	% (of	apprentices)

Statewide apprentice participation in occupation or program as of [Current Date]:

Percentage of Black or African American:	% (of	apprentices)
Percentage of American Indian or Alaskan Native:	% (of	apprentices)
Percentage of Asian:	% (of	apprentices)
Percentage of Native Hawaiian or Pacific Islander:	% (of	apprentices)
Percentage of Hispanic or Latinx (all races):	% (of	apprentices)
Percentage of female and non-binary:	% (of	apprentices)

Workforce population for geographic area from Census workforce indicators:

Percentage of Black or African American:	%
Percentage of American Indian or Alaskan Native:	%
Percentage of Asian:	%
Percentage of Native Hawaiian or Pacific Islander:	%
Percentage of Hispanic or Latinx (all races):	%
Percentage of female:	%

Workforce population from training agent internal pool workforce analysis:

Percentage of Black or African American:	%
Percentage of American Indian or Alaskan Native:	%
Percentage of Asian:	%
Percentage of Native Hawaiian or Pacific Islander:	%
Percentage of Hispanic or Latinx (all races):	%
Percentage of female and non-binary:	%

Utilization Goals for Race, Sex, and Ethnicity

Year 1: [Year]	Black or African American:	% (of	apprentices)
	American Indian or Alaskan Native:	% (of	apprentices)
	Asian:	% (of	apprentices)
	Native Hawaiian or Pacific Islander:	% (of	apprentices)
	Hispanic or Latinx (All Races):	% (of	apprentices)
	Female and non-binary:	% (of	apprentices)
Year 2: [Year]	Black or African American:	% (of	apprentices)
	American Indian or Alaskan Native:	% (of	apprentices)
	Asian:	% (of	apprentices)
	Native Hawaiian or Pacific Islander:	% (of	apprentices)
	Hispanic or Latinx (All Races):	% (of	apprentices)
	Female and non-binary:	% (of	apprentices)
Year 3: [Year]	Black or African American:	% (of	apprentices)
	American Indian or Alaskan Native:	% (of	apprentices)
	Asian:	% (of	apprentices)
	Native Hawaiian or Pacific Islander:	% (of	apprentices)
	Hispanic or Latinx (All Races):	% (of	apprentices)
	Female and non-binary:	% (of	apprentices)

EEO work team recommends approval: **Yes** **No**

Work team comments:

Appendix D – Template for Utilization Goals for Race, Sex, and Ethnicity for standards with 10 or less apprentices

Program or occupation apprentice composition as of [Current Date]:

Percentage of **Black or African American, American Indian or Alaskan Native, Asian, and/or Native Hawaiian or Pacific Islander:** % (of apprentices)
 Percentage of **Hispanic or Latinx (all races):** % (of apprentices)
 Percentage of **female and non-binary:** % (of apprentices)

Statewide apprentice participation in program or occupation as of [Current Date]:

Percentage of **Black or African American:** % (of apprentices)
 Percentage of **American Indian or Alaskan Native:** % (of apprentices)
 Percentage of **Asian:** % (of apprentices)
 Percentage of **Native Hawaiian or Pacific Islander:** % (of apprentices)
 Percentage of **Hispanic or Latinx (all races):** % (of apprentices)
 Percentage of **female and non-binary:** % (of apprentices)

Workforce population for geographic area from Census workforce indicators:

Percentage of **Black or African American:** %
 Percentage of **American Indian or Alaskan Native:** %
 Percentage of **Asian:** %
 Percentage of **Native Hawaiian or Pacific Islander:** %
 Percentage of **Hispanic or Latinx (all races):** %
 Percentage of **female:** %

Workforce population from training agent internal pool workforce analysis:

Percentage of **Black or African American:** %
 Percentage of **American Indian or Alaskan Native:** %
 Percentage of **Asian:** %
 Percentage of **Native Hawaiian or Pacific Islander:** %
 Percentage of **Hispanic or Latinx (all races):** %
 Percentage of **female and non-binary:** %

Utilization Goals for Race, Sex, and Ethnicity

Year 1: [Year]

Black or African American, American Indian or Alaskan Native, Asian, and/or Native Hawaiian or Pacific Islander:	% (of)	apprentices)
Hispanic or Latinx (all races):	% (of)	apprentices)
Female and non-binary:	% (of)	apprentices)

Year 2: [Year]

Black or African American, American Indian or Alaskan Native, Asian, and/or Native Hawaiian or Pacific Islander:	% (of)	apprentices)
Hispanic or Latinx (all races):	% (of)	apprentices)
Female and non-binary:	% (of)	apprentices)

Year 3: [Year]

Black or African American, American Indian or Alaskan Native, Asian, and/or Native Hawaiian or Pacific Islander:	% (of)	apprentices)
Hispanic or Latinx (all races):	% (of)	apprentices)
Female and non-binary:	% (of)	apprentices)

EEO work team recommends approval: **Yes** **No**

Work team comments:

Appendix E: Invitation to Self-Identify as an Individual with a Disability

Oregon Bureau of Labor and Industries, Apprenticeship and Training Division
INVITATION TO SELF-IDENTIFY AS AN INDIVIDUAL WITH A DISABILITY

Why are you being asked to complete this form?

Because we are a sponsor of a registered apprenticeship program and participate in the Oregon Registered Apprenticeship System that is regulated by the Oregon Bureau of Labor and Industries, we must reach out to, enroll, and provide equal opportunity in apprenticeship to qualified people with disabilities¹. To help us learn how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability.

If you already are an apprentice within our registered apprenticeship program, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our apprentices at the time of enrollment, and then remind them yearly, that they may update their information. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

NOTICE

Applicants:	Self-disclosure <u>is not</u> an invitation for the apprenticeship program to follow-up with you.
Apprentices:	Self-disclosure <u>is not</u> a request for accommodation nor is it an invitation for the apprenticeship program to follow-up with you.
Program Staff:	This form is for utilization analysis. It may not be used to follow-up with applicants or apprentices unless an explicit request for accommodation is made.

If you are an individual with a disability and need an accommodation, please contact the program administrator for the procedures to make a formal request.

How do I know if I have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition. Disabilities include, but are not limited to: blindness, deafness, cancer, diabetes, epilepsy, autism, cerebral palsy, HIV/AIDS, schizophrenia, muscular dystrophy, bipolar disorder, major depression, multiple sclerosis (MS), missing limbs or partially missing limbs, post-traumatic stress disorder (PTSD), obsessive compulsive disorder, impairments requiring the use of a wheelchair, intellectual disability (previously called mental retardation).

Please check one of the boxes below:

- YES, I HAVE A DISABILITY (or previously had a disability)
- NO, I DON'T HAVE A DISABILITY
- I DON'T WISH TO ANSWER

Signature: _____ Date: _____

Printed Name _____

¹ Oregon Plan for Equal Employment Opportunity in Apprenticeship, OAR 839-011-0200. For more information about this form or the equal employment obligations of Oregon's apprenticeship programs, visit the Oregon Bureau of Labor and Industries website at https://www.oregon.gov/boli/apprenticeship/pages/default.aspx	Apprenticeship Programs Must Complete this Section	
	Apprenticeship Agreement Number:	_____
	Occupational Standard:	_____
	Symbol.Suffix	_____

Targeted Outreach, Recruitment and Retention Plan
[Committee] – MA [####]
[Month / Year] to [Month / Year]

The geographic area for Outreach and Recruitment shall be [Counties in Standard(s)] county/counties in the State of Oregon

Instructions:

1. Develop targeted outreach, recruitment, and retention activities that are likely to generate an increase in applications for apprenticeship and improve retention of apprentices from targeted groups and/or from individuals with disabilities.
2. Designate the responsible party tasked with performing the activities and project the timeline for completion.
3. Track the date that activities were completed and evaluate and document the overall effectiveness of such activities in the Results and Comments. Examples of this could be attendance numbers, number of applications received from targeted groups, and the type(s) of information delivered.
4. Maintain records of targeted outreach, recruitment, and retention activities and records related to its evaluation of these activities.
5. Begin building next year’s plan based on the success of your current plan and refine its targeted outreach, recruitment, and retention activities as needed.

Please contact ATD’s Equal Employment Opportunity Team at General.ATD@boli.oregon.gov for activity ideas and/or more information on completing this plan.

Activity 1: Recruitment 1
Steps taken to advertise openings:..... 1

Activity 2: Outreach 2
Steps taken to distribute information to organizations serving targeted populations:..... 2
Steps taken to work with school boards and vocational education systems..... 2
Steps taken to connect with community organizations and pre-apprenticeship programs for the purpose of adding them to Recruitment Source List..... 3

Activity 3: Retention 4

Activity 1: Recruitment

Required Recruitment Activity:

Advertising openings for apprenticeship opportunities by publishing advertisements in appropriate media which have wide circulation in the relevant recruitment areas.

<i>Steps taken to advertise openings:</i>		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.	Required Activity: Develop and update annually a list of current Recruitment Sources that will generate referrals from all demographic groups within the relevant Recruitment area.				
2.	Required Activity: Provide Recruitment Sources advance notice, preferably 30 days, of apprenticeship openings so that the recruitment sources can notify and refer candidates.				
3.					
4.					

Other Recruitment Activities		Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.					
2.					
3.					
4.					
5.					
6.					
7.					

Activity 2: Outreach

Required Outreach Activity:

Dissemination of information to organizations serving the underutilized group regarding the nature of apprenticeship, requirements for selection for apprenticeship, availability of apprenticeship opportunities, and the equal opportunity pledge of the sponsor. These organizations may include Community-based organizations; local high schools; local community colleges; local vocational, career and technical schools; and local workforce system partners including WorkSource centers.

Steps taken to distribute information to organizations serving targeted populations:	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.				
2.				
3.				
4.				

Required Outreach Activity:

Cooperation with local school boards and vocational education systems to develop and/or establish relationships with pre-apprenticeship programs targeting students from the underutilized group to prepare them to meet the standards and criteria required to qualify for entry into apprenticeship programs.

Steps taken to work with school boards and vocational education systems:	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.				
2.				
3.				
4.				

Required Outreach Activity:

Establishment of linkage agreements or partnerships enlisting the assistance and support of pre-apprenticeship programs, community-based organizations, advocacy organizations, or other appropriate organizations, in recruiting qualified individuals for apprenticeship.

Steps taken to connect with community organizations and pre-apprenticeship programs for the purpose of adding them to Recruitment Source List:	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.				
2.				
3.				
4.				

Other Outreach Activities	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.				
2.				
3.				
4.				
5.				
6.				

Activity 3: Retention

Practices to retain targeted populations and committee effort to [maintain](#) a working [environment](#) which supports [current](#) apprentices to remain with the program. This includes committee retention policies aimed at addressing the various needs of apprentices with the goal of enhancing their [job satisfaction](#) and reducing the [substantial costs](#) involved in hiring and [training](#) new apprentices.

Retention Activities	Responsible Person or Organization	Projected Timeline	Date Completed	Results and Comments
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				

Annual Recruitment Source List : Update and submit annually with Targeted Plan					
Source Name	Contact Person at Source	Mailing Address	Email Address	Opening Announcement Sent Date	Date: Information Updated
Examples (Not All-Inclusive List):					
WorkSource Oregon Local Offices					
GED Testing Centers					
Career-Tech Programs					
Pre-apprenticeship Programs					
Job Corps					
Vocational Rehabilitation Counselors					
Youthbuild Program					
College Financial Aid Offices					
Community-based Organizations					
Local High School Career Counselors					
Workforce Investment Boards					
Community Colleges					
Chamber of Commerce					
Trade or Industry Groups					

[DATE]

[Administrator name], [Administrator Title]

[MA # - Program name]

[Program address]

Subject: MA [XXXX] – [Committee Name] Compliance Review Report

Dear [Administrator/Coordinator/(Title)] [Last Name],

The Apprenticeship and Training Division’s (ATD) mission is to support opportunities for family wage jobs and a qualified workforce through apprenticeship programs. We aim to provide the necessary support to ensure that the apprenticeship system in Oregon runs effectively. We recently conducted a compliance review of your program. The purpose of the review was to determine whether your program is following applicable state and federal regulations. Review findings:

Equal Employment Opportunity Review Period: [Date to Date] **Finding:** [Level] Compliance

Your program [may/must] submit a written response to the review to address the remedies required in the Compliance Action Plan on page [#]. Your response will be forwarded to the Oregon State Apprenticeship and Training Council (OSATC) with this compliance report. [Should you wish to respond, p][P]lease ensure that your response includes the following:

- A specific commitment to correct identified deficiency[ies] and area[s] of noncompliance;
- The precise actions to be taken for each deficiency identified;
- The time period within which the cited deficiency[ies] will be remedied and any corrective program changes implemented; and
- The name of the individual(s) responsible for correcting each deficiency identified.

[Optional/Required] response due: [DATE]

Submit to: [Reviewer Name]

at GeneralATD@boli.state.or.us

(Delete if in full compliance) A committee representative is also required to attend the below meeting:

OSATC Meeting: [DATE & TIME]

Meetings are currently being held online. Please visit

www.oregon.gov/boli/apprenticeship/Pages/oregon-state-apprenticeship-and-training-council.aspx for the link to attend.

Please contact me at the email address listed above, or by phone at [reviewer’s office phone #] if you have any questions regarding the review.

Sincerely,

Bureau of Labor and Industries – Apprenticeship and Training Division

Equal Employment Opportunity Compliance Report for Committee

MA – Committee:		Review date:	
Reviewer:		Review period:	
Occupation[s]:			

Review finding:	<input type="checkbox"/> Compliance Progress made towards Utilization Goals; Targeted Outreach, Recruitment, and Retention Plan and Selection Procedures implemented as approved with required documentation; Anti-Harassment Training implemented; Personnel Processes reviewed; Disability Invitations and other required records on file; and minimal changes required.
	<input type="checkbox"/> Good Faith Compliance Progress made towards Utilization Goals; Targeted Outreach, Recruitment, and Retention Plan and Selection Procedure implemented as approved with required documentation; Anti-Harassment Training implemented but records of training partially on file; Personnel Processes reviewed at least at least once during review period; Disability Invitations partially on file; and minimal changes required. Other factors may be considered in this determination. Please see Comments section below.
	<input type="checkbox"/> Out of Compliance No progress made towards Utilization Goals; Targeted Outreach, Recruitment, and Retention Plan and Selection Procedures not current or on file; Personnel Processes not reviewed; Disability Invitations not on file; and substantial changes required. Other factors may be considered in this determination. Please see Comments section below.
	<input type="checkbox"/> Disparate Impact Noted Over Ten Year Span or <input type="checkbox"/> N/A Information collected during this performance period indicates a disparate impact on target races, sex, and ethnicity.

Date report sent to committee:	Date [optional/required] response due:
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Compliance Areas	Applicable Regulation	Change Required*	No Change Required	Not Applicable
1. Targeted Outreach, Recruitment, and Retention Plan				
a. Targeted outreach, recruitment, and retention plan updated annually	<i>Oregon Plan for Equal Employment Opportunity in Apprenticeship (Oregon Plan) Section 8</i>			
b. Recruitment source list utilized and maintained	<i>Oregon Plan Section 3 Part (e)</i>			
c. Planned or equivalent activities completed	<i>Oregon Plan Section 8</i>			
2. Review of Personnel Processes				
a. Performed annually during the review period	<i>Oregon Plan Section 9</i>			
b. Modifications made to personnel processes if adverse impact detected	<i>Oregon Plan Section 9 (b)</i>			
3. Utilization for Race, Sex, and Ethnicity				

ATD Guide to Implementing the Oregon Plan

a. Workforce analysis performed during review period	<i>Oregon Plan Section 5 Part (b)</i>			
Compliance Areas. Approved utilization goals in place	Applicable Regulation	Change Required*	No Change Required	Not Applicable
c. Progress made towards goals	<i>Oregon Plan Section 6 Part (d)</i>			
4. Anti-Harassment Training				
a. Approved training content	<i>Oregon Plan Section 3 Part (f)</i>			
b. Documentation of training completed by apprentices, training agents, committee members, and program staff	<i>Oregon Plan Section 3 Part (f)</i>			
5. Affirmative Action Program Records				
a. Person assigned as program EEO authority	<i>Oregon Plan Section 3 Part (c)</i>			
b. Published and posted EEO pledge	<i>Oregon Plan Section 3 Part (d)</i>			
c. Apprentice selection worksheet submitted to the Division annually	<i>Oregon Plan Section 12 Part (a)</i>			
d. Applicant tracking system in place and reportable to the Division	<i>Oregon Plan Section 12 Part (b)</i>			
e. Apprentice selection procedures approved and in standard(s) of apprenticeship	<i>Oregon Plan Section 10 Part (a)</i>			
6. Disability Utilization and Tracking				
a. Invitations to self-identify performed and on file	<i>Oregon Plan Section 11</i>			
b. Workforce analysis performed during review period	<i>Oregon Plan Section 7 Part (d)</i>			
c. Progress towards utilization goal made for review period	<i>Oregon Plan Section 7 Part (h)</i>			
<p><u>Previous Compliance Findings</u></p> <p>####-#### EEO Finding: [FINDING]</p> <p>####-#### EEO Finding: [FINDING]</p> <p><u>Comments</u></p> <p><u>The program is being found in XXX Compliance due to the following factors:</u></p> <ul style="list-style-type: none"> • • <p>* Additional required follow-up is noted in bold print below.</p>				
Area 1	TARGETED OUTREACH, RECRUITMENT AND RETENTION PLAN			

ATD Guide to Implementing the Oregon Plan

	[delete unused lettered items (preferred)]
	<ul style="list-style-type: none"> a. Targeted outreach, recruitment, and retention plan updated annually: b. Recruitment source list utilized and maintained: c. Planned or equivalent activities completed:
Area 2	<p>REVIEW OF PERSONNEL PROCESSES</p> <ul style="list-style-type: none"> a. Performed annually during the review period: b. Modifications made to personnel processes if adverse impact detected:
Area 3	<p>UTILIZATION FOR RACE, SEX, AND ETHNICITY</p> <ul style="list-style-type: none"> a. Workforce analysis performed during review period: b. Approved utilization goals in place: c. Progress made towards goals during review period:
Area 4	<p>ANTI-HARASSMENT TRAINING</p> <ul style="list-style-type: none"> a. Approved training content: b. Documentation of training completed by apprentices, training agents, committee members, and program staff:
Area 5	<p>AFFIRMATIVE ACTION PROGRAM RECORDS</p> <ul style="list-style-type: none"> a. Responsible person assigned as program EEO authority: b. Published and posted EEO pledge: c. Apprentice selection worksheet submitted to the Division annually: d. Applicant tracking system in place and reportable to the Division: e. Apprentice selection procedures approved and in standard(s) of apprenticeship:
Area 6	<p>DISABILITY UTILIZATION AND TRACKING</p> <ul style="list-style-type: none"> a. Invitations to self-identify performed and on file: b. Workforce analysis performed during review period: c. Progress towards utilization goals made during review period:
Report 1	<p>COMPLETION RATE COMPARISON</p> <p><u>Review period:</u></p> <p style="padding-left: 40px;">xxx</p> <p><u>10-year comparison:</u></p> <p style="padding-left: 40px;">xxx</p>
Report 2	<p>STANDARD REVIEW</p>

COMPLIANCE ACTION PLAN		
DEFICIENCY	REMEDY	DUE DATE
(Delete Unused Rows. Optional: use section numbering [2b, etc.])		