



EEO in Apprenticeship Compliance Timetable

EXISTING Sponsors – Initial Obligations*	NEW Sponsors – Initial Obligations*
<p>On Effective Date (January 18, 2017)</p> <p>All obligations in rule not specifically listed below take effect (e.g., selection procedures (§ 30.10), recordkeeping (§ 30.12), compliance review/complaint procedures (§§ 30.13-14), sanctions (§ 30.15), intimidation/retaliation protections (§ 30.17))</p>	<p>Upon Registration (or Effective Date, whichever is later)</p> <p>All obligations in rule not specifically listed below take effect (e.g., selection procedures (§ 30.10), recordkeeping (§ 30.12), compliance review/complaint procedures (§§ 30.13-14), sanctions (§ 30.15), intimidation/retaliation protections (§ 30.17))</p>
<p>180 Days post-Effective Date</p> <p>Non-discrimination / general affirmative action obligations in § 30.3</p> <ul style="list-style-type: none"> • Refrain from discrimination, including new protected bases • Update and disseminate EO pledge • Begin universal outreach efforts • Implement anti-harassment measures 	<p>Upon Registration (or 180 days post-Effective Date, whichever is later)</p> <p>Non-discrimination / general affirmative action obligations in § 30.3</p> <ul style="list-style-type: none"> • Refrain from discrimination, including new protected bases • Update and disseminate EO pledge • Begin universal outreach efforts • Implement anti-harassment measures
<p>2 Years post-Effective Date</p> <ul style="list-style-type: none"> • By 2 year mark, disseminate one-time invitation to self-identify (ID) for all current apprentices, begin self-ID at pre and post stage (§ 30.11) • Begin invitations to self-ID at pre-offer and post-offer stage (§ 30.11) • Conduct initial workforce analysis for race/sex (§ 30.5(b)) and individuals with disabilities (§ 30.7(d)(2)) • Conduct initial review of personnel processes (§ 30.9) • Draft written AAP (§ 30.4(e)) 	<p>2 Years post-Registration</p> <ul style="list-style-type: none"> • By 2 year mark, disseminate one-time invitation to self-ID for all current apprentices, begin self-ID at pre and post stage (§ 30.11) • Begin invitations to self-ID at pre-offer and post-offer stage (§ 30.11) • Conduct initial workforce analysis for race/sex (§ 30.5(b)) and IWD (§ 30.7(d)(2)) • Conduct initial review of personnel processes (§ 30.9) • Draft written AAP (§ 30.4(e))
<p>At First Compliance Review After Effective Date (whenever that occurs)</p> <ul style="list-style-type: none"> • Conduct utilization analysis for race/sex (w/ RA assistance) (§ 30.5(c)) • If data shows underutilization for sex, minority group, or IWDs, set utilization goal (§§ 30.6, 30.7) 	<p>At First Compliance Review After Effective Date (whenever that occurs)</p> <ul style="list-style-type: none"> • Conduct utilization analysis for race/sex (w/ RA assistance) (§ 30.5(c)) • If data shows underutilization for sex, minority group, or IWDs, set utilization goal (§§ 30.6, 30.7)
<p>Upon Finding of Underutilization and Utilization Goal Being Set</p> <ul style="list-style-type: none"> • For IWD, determine whether impediments to EEO exist (considering outreach/recruitment and review of personnel processes); if so, undertake action-oriented programs in § 30.8 • For race/sex, undertake action-oriented programs in § 30.8 	<p>Upon Finding of Underutilization and Utilization Goal Being Set</p> <ul style="list-style-type: none"> • For IWD, determine whether impediments to EEO exist (considering outreach/recruitment and review of personnel processes); if so, undertake action-oriented programs in § 30.8 • For race/sex, undertake action-oriented programs in § 30.8

* These deadlines also apply to sponsors in SAA states, with the prerequisite that the state has enacted language adopting the updated part 30 regulation, per § 30.18.

Schedule of Recurring Obligations

Update List of Recruitment Sources (§ 30(b)(3)(i)):

- Annually

Update Written AAP (§ 30.4(e))

- Each time workforce analysis is done (at compliance review, and then again in 3 years if no intervening compliance review)

Conduct Workforce Analysis (race/sex/ethnicity) (§ 30.5(b)):

- At each compliance review, and again if 3 years have passed since last workforce analysis without a compliance review

Conduct Availability Analysis (race/sex/ethnicity) (§ 30.5(c)):

- At each compliance review

Establish Utilization Goals (race/sex/ethnicity) (§ 30.6(a)):

- At each compliance review (if underutilized)

Conduct Workforce Analysis (disability) (§ 30.7(d)(2)):

- At each compliance review, and again if 3 years have passed since last workforce analysis without a compliance review

Action oriented efforts (§ 30.8):

- Race/sex/ethnicity: Only undertaken if goal is set at compliance review
- Disability: Only undertaken if underutilization determined and impediments to EEO are determined to exist

Review of personnel processes (§ 30.9):

- Annually

Invitation to self-identify as individual with a disability (§ 30.11):

- Pre-offer: When individual applies or is considered for apprenticeship
- Post-offer: After acceptance into program, but before apprenticeship begins
- Reminder to apprentices in program that they can update self-ID: Annually.