



What to Know before You EEO

Registered Apprenticeship Sponsors' Equal Employment Opportunity Responsibilities

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Registered Apprenticeship program sponsors must comply with US Department of Labor (DOL) regulations on Equal Employment Opportunity. The rules set expectations for sponsors related to apprentices' recruitment and training. Although the EEO rules may appear complicated, they are similar or identical to many employers' existing practices, policies, and legal requirements and help ensure programs access and retain diverse talent. This fact sheet is a quick guide to help clarify EEO regulations for sponsors.

WHAT IS THE GOAL OF THE EQUAL EMPLOYMENT OPPORTUNITY REGULATIONS?

The EEO regulations [help employers recruit and retain a diverse pool of apprentices](#) by setting consistent sponsor expectations. The rules affirm that it is [unlawful for a Registered Apprenticeship program sponsor to discriminate against an apprentice or applicant](#) based on race, color, religion, national origin, sex, sexual orientation, age (40 or older), genetic information, or disability.

HOW IS THIS DIFFERENT FROM MOST EMPLOYERS' CURRENT PRACTICES?

The practices employers must undertake to comply with EEO in registered apprenticeships are [similar to, or the same as, procedures most employers are already doing](#). These include efforts to attract diverse applicants and ensure a work environment free from unlawful discrimination. Compliance with EEO simply formalizes these processes for your apprenticeship program and ensures that you keep the required records.

DOES EEO COMPLIANCE DIFFER IF I HAVE A STATE-REGISTERED PROGRAM?

The EEO rule applies to all sponsors regardless of whether they have a program registered with the DOL's Office of Apprenticeship or a State Apprenticeship Agency. However, State Apprenticeship Agency-registered programs may have additional requirements. Contact your state agency representative to confirm: <http://urbn.is/3bcTpgg>.

WHAT ROLE DO EMPLOYERS PLAY?

When employers participate in an apprenticeship program sponsored by another organization, they play an essential role in supporting compliance and ensuring a discrimination-free work environment. Employers look to sponsors for information on what to do, including how to improve their recruiting processes and make EEO information available.

WHAT ROLE DO SPONSORS PLAY?

Responsibility for complying with EEO rules falls on program sponsors, with four main responsibilities:

1. Assign EEO responsibilities to specific staff. Sponsors should identify the internal individual(s) (e.g., apprenticeship coordinators) to oversee program compliance with EEO, with the following responsibilities:

- Monitor program activity to ensure EEO compliance.
- Maintain records (for five years) on apprenticeship selection; invitations to self-identify as an individual with a disability; requests for reasonable accommodation; and information on program operations and actions to increase participation for women, people of color, and individuals with disabilities.

- Provide the registration agency with access to records necessary to conduct EEO compliance reviews or investigations (e.g., for nationally registered programs, the registration agency is the Office of Apprenticeships).
- For programs with five or more apprentices, develop and implement an affirmative action plan within two years of registration.

2. Engage in universal outreach, recruitment, and selection. Initiate efforts to reach and recruit diverse candidates, broaden the pool of qualified candidates, and help sponsors and employers develop strong workforces. (See links to the **Universal Outreach Tool** and **affirmative action requirements**, below.) EEO requirements for sponsors include:

- Develop and update annually a list of recruitment sources that will generate referrals from all demographic groups within the relevant recruitment area.
- Confirm a contact person, mailing address, telephone number, and email address for each recruitment source.
- Provide recruitment sources with advance notice (preferably 30 days) of apprenticeship openings to give them time to identify and refer candidates.

3. Maintain an apprenticeship environment free from discrimination, harassment, intimidation, or retaliation. To meet this requirement of EEO regulations, sponsors must:

- Provide interactive antiharassment training (see **antiharassment training materials**, also listed under additional resources below) that communicates, at a minimum, the following:
 - » Harassing conduct won't be tolerated.
 - » The definition of harassment and types of conduct that constitute unlawful harassment.
 - » The right to file a harassment complaint with the registration agency.
- Make facilities and activities available to all and establish and implement their own procedures for handling and resolving complaints about harassment or retaliation.

4. Communicate EEO policy internally. Sponsors or employers must have and communicate an EEO policy (in appropriate publications such as employee handbooks, policy manuals, or other documents) that outlines expectations and steps taken to ensure equal employment opportunity and an environment free from unlawful discrimination.

WHERE CAN I FIND ADDITIONAL RESOURCES?

The Urban Institute's apprenticeship resource page: <http://urbn.is/2tivtpa>.

US Department of Labor Resources

- Guidance for sponsors: <https://urbn.is/3ariDZ4>.
- Universal Outreach Tool to help reach diverse and qualified candidates: <http://urbn.is/3dqFvKb>.
- Affirmative Action Program Requirements: <http://urbn.is/3ats8Ht>.
- Information on protected characteristics: <http://urbn.is/3s3mXng>.
- Ready-to-use materials to help sponsors deliver antiharassment training: <https://urbn.is/3diQBkt>.
- A customizable poster of the required workplace notice providing the EEO Pledge and information regarding the right of apprentices to file discrimination complaints: <http://urbn.is/37qotbc>.

DISCLAIMER

This fact sheet is not intended as legal advice. For legal questions, please review the US Department of Labor's guidance and applicable laws in your jurisdiction or consult a labor discrimination lawyer.