APPRENTICESHIP MINNESOTA

Extended Apprenticeship Program Review (EAPR) Checklist

The Minnesota Department of Labor and Industry (DLI) conducts program reviews to assess the overall condition of a sponsor's program and compliance with registered standards and the relevant regulations at 29 Code of Federal Regulations (CFR) part 29 and part 30, and Minnesota Statutes §178 and Minnesota Rules 5200.0320.

For programs with five or more apprentices, two years after the date a program is registered and prior to the first EAPR review, sponsors need to create a written Affirmative Action Plan (AAP), conduct an initial annual review of the Personnel Process related to the administration of their program to ensure they are operating their programs free from discrimination and begin inviting all applicants and apprentices to self-identify whether they have a disability. This information is needed to conduct an EAPR. Programs with five or more active apprentices must continue to be reviewed annually using the APR and EAPR checklists.

Checklist one: Identification information

Region:

State:

Program name:

Program number:

Sponsor contact name/address

Date program registered:

Date of this last approved AAP:

Two-year compliance date:

Date of this review:

Review type

[ ] Initial EAPR Review

[ ] Subsequent EAPR Review

Review occurred   [ ] Remote   [ ] On-site review

Type and size of program:

[ ] Single employer

[ ] Single employer with a CBA

[ ] Multi-employer

[ ] Multi-employer with a CBA

Corrective letter date

Follow-up date

Corrected date

Checklist eight: Sponsor's annual reviews of personnel process

Frequency of Annual Reviews of Personnel Processes

1. The sponsor has conducted a careful, thorough and systematic Annual Review of Personnel Processes of all aspects of its apprenticeship program in order to ensure that it was operating its program free from unlawful discrimination; this must occur every year from its two-year compliance date or its most recent EAPR, whichever was later. **[ ] Yes [ ]No**

    If the response to item 1 is yes, evaluate the Annual Review of Personnel Processes that the sponsor conducted for its most recent program year (using items 2-3 below).

2. The sponsor conducted such a review for some of the years since its two-year compliance date or its most recent EAPR, whichever was later. **[ ] Yes [ ]No**

    Indicate the years for which the sponsor conducted the Annual Review of Personnel Processes

    If the answer to item 2 is yes, evaluate all the Annual Reviews of Personnel Processes that the sponsor conducted during this period (using items 2-4 below). If the responses to items 1 OR 2 are no, it is a deficiency.

Thoroughness of the Annual Reviews of Personnel Processes

3. The sponsor thoroughly considered whether each of the below aspects of the program created a barrier to equal opportunity for any protected demographic group. **29 CFR § 30.9**

    If the sponsor did not consider an aspect of its program listed in items 3(a)-(j) below at all, check "no." If the sponsor considered an aspect, but not thoroughly, check "no" and record the reason(s) for your evaluation where indicated.

a. Qualifications for apprenticeship **[ ] Yes [ ]No**

b. Application and selection procedures **[ ] Yes [ ]No**

C. Wages **[ ] Yes [ ]No**

d. Outreach and recruitment activities **[ ] Yes [ ]No**

e. Advancement opportunities and promotions **[ ] Yes [ ]No**

f. Work assignments and rotations among all work processes of the occupation **[ ] Yes [ ]No**

g. Evaluations of job performance **[ ] Yes [ ]No**

h. Disciplinary actions **[ ] Yes [ ]No**

i. Handling of requests for reasonable accommodations **[ ] Yes [ ]No**

j. The program's accessibility to IWDs (individuals with disabilities) (including the accessibility of information and communication technology) **[ ] Yes [ ]No**

Sponsor's response to its evaluation of its program.

The sponsor modified its policies and practices —

4. Where it found in its Annual Review of Personnel Processes that any such policy or practice created a barrier to equal opportunity for any protected demographic group. **[ ] Yes [ ]No**

5. If it set goals for any demographic group during its last Affirmative Action Plan and it failed to achieve or make reasonable progress toward those goals. **[ ] Yes [ ]No**

Incorporation into Affirmative Action Plan and standards

6. The sponsor updated its written Affirmative Action Plan by describing its Annual Review of Personnel Processes and identifying any modifications made (or to be made) to the program as a result of that review. **29 CFR § 30.929 CFR § 30.9 [ ] Yes [ ]No**

7. If the modifications required any change(s) to the apprenticeship standards, the sponsor made those changes. **29 CFR § 29.3(i)29 CFR § 29.3(i) [ ] Yes [ ]No**

Checklist nine: Invitations to self-identify as an individual with a disability (IWD)

Invitations to applicants to self-identify as an IWD

1. (Pre-offer) Separately from the application itself, the sponsor has extended an invitation to every applicant before making any offers of admission into the program using the Voluntary Disability Disclosure Form (Section II of Form 671). **[ ] Yes [ ]No**

The invitation may be included with the application materials for apprenticeship, but it must be separate from the application.

2. *(Post-offer) The sponsor has extended an invitation to every applicant after offering admission into the program, but before beginning his or her apprenticeship; this has been done using the Voluntary Disability Disclosure Form (Section II of Form 671).* **[ ] Yes [ ]No**

Invitations to *apprentices* to self-identify as an (IWD)

3. *[To be completed only at the first EAPR after the sponsor's two-year compliance date]* The sponsor extended an invitation to self-identify as an IWD to every current apprentice, using the Voluntary Disability Disclosure Form (Section II of Form 671), by its two-year compliance date. **[ ] Yes [ ]No**

4. The sponsor has reminded its apprentices yearly that they may voluntarily update their disability status. **[ ] Yes [ ]No**

Confidentiality of information

5. The sponsor has kept all information on disability self-identification confidential and maintained it in a separate data analysis file (rather than in the medical or program files of individual apprentices). **[ ] Yes [ ]No**

Checklist 10: Workforce analysis for race, sex and ethnicity

Instructions for completing workforce analyses for race, sex and ethnicity by occupational title are contained in the AAP Boilerplate (see Tables 1-3).

Workforce analyses by occupational title.

1. *If this is the sponsor's first EAPR since its two-year compliance date]* The sponsor conducted a workforce analysis for race, sex and ethnicity for each of its registered occupational titles by its two-year compliance date. **[ ] Yes [ ]No**

2. *[At subsequent EAPRs]* The sponsor conducted a workforce analysis for race, sex and ethnicity for each of its registered occupational titles at least once every three years if a program review has not taken place. **[ ] Yes [ ]No**

Grouping occupational titles into major occupation groups.

*Major occupation groups consist of all the occupational titles that share the same 2-digit SOC/O*NET code*

3. *[If this is the sponsor's first EAPR since its two-year compliance date*] The sponsor correctly grouped its registered occupational titles into major occupation groups by its two-year compliance date. **[ ] Yes [ ]No**

   [At subsequent EAPRs] If there was a change in its registered occupational titles, the sponsor updated its major occupation groups at least once every three years if a program review has not taken place. **[ ] Yes [ ]No**

Workforce analyses by major occupation group.

Instructions for completing workforce analyses for race, sex and ethnicity by major occupation groups are contained in the AAP Boilerplate (see Tables 4-6).

4. *[If this is the sponsor's first EAPR since its two-year compliance date]* The sponsor conducted a workforce analysis for race, sex and ethnicity for each of its major occupation groups by its two-year compliance date. **[ ] Yes [ ]No**

5. *[At subsequent EAPRs]* The sponsor conducted a workforce analysis for race, sex and ethnicity for each of its major occupation groups at least once every three years if a program review has not taken place **[ ] Yes [ ]No**

Checklist 11: Workforce analysis for disability

Workforce analyses by occupational title.

Instructions for completing workforce analyses for disability by occupational title are contained in the AAP Boilerplate (see Table 8).

1. *[If this is the sponsor's first EAPR since its two-year compliance date]* The sponsor conducted a workforce analysis for disability for each of its registered occupational titles by its two-year compliance date. **[ ] Yes [ ]No**

2. *[At subsequent EAPRs]* The sponsor conducted a workforce analysis for disability for each of its registered occupational titles at least once every three years if a program review has not taken place. **[ ] Yes [ ]No**

Grouping occupational titles into major occupation groups

Major occupation groups consist of all the occupational titles that share the same 2-digit SOC/O*NET code.

3. *[If this is the sponsor's first EAPR since its two-year compliance date]* The sponsor correctly grouped its registered occupational titles into major occupation groups by its two-year compliance date.
   [ ] Yes [ ]No

4. *[At subsequent EAPRs]* If there was a change in its registered occupational titles, the sponsor updated its major occupation groups at least once every three years if a program review has not taken place.
   [ ] Yes [ ]No

Workforce analyses by major occupation group

Instructions for completing workforce analyses for disability by major occupation group are contained in the AAP Boilerplate (see Table 9).

5. *[If this is the sponsor's first EAPR since its two-year compliance date]* The sponsor conducted a workforce analysis for disability for each of its major occupation groups by its two-year compliance date.
   [ ] Yes [ ]No

6. *[At subsequent EAPRs]* The sponsor conducted a workforce analysis for disability for each of its major occupation groups at least once every three years if a program review has not taken place.
   [ ] Yes [ ]No

Checklist 12: Targeted outreach, recruitment and retention activities (if required)

Completion of this checklist is mandatory only if sponsors were required to adopt race, sex or ethnicity goals because there were impediments or underutilization for any such group that prevented equal employment opportunity for IWDs during the most recent EAPR. Please refer to Sections IV and V of the AAP Boilerplate and the Reference Guide for the AAP Boilerplate for guidance on how to assist sponsors with establishing and recording utilization goals for any race, sex, or ethnicity group in which there was underutilization or where any impediments to equal employment opportunity were identified for IWDs.

As of the date of the most recent workforce analyses, the proportion in each of the sponsor's major occupation groups of the demographic group(s) for which the sponsor found underutilization and set a utilization goal at its previous EAPR.

Major Occupation Group

1. As of the date of the most recent workforce analyses, the proportion in each of the sponsor's major occupation groups of the demographic group(s) for which the sponsor found underutilization and set a utilization goal at its previous EAPR.

Demographic group	Previous goal set (%)	% in apprentice workforce	Has the sponsor met or exceeded their previously established utilization goal through targeted outreach, recruitment and retention?	2. Record the reasons the sponsor has given
a. Women	%	%	[ ] Yes [ ]No	
b. Hispanic	%	%	[ ] Yes [ ]No	
c. African American	%	%	[ ] Yes [ ]No	
d. Asian	%	%	[ ] Yes [ ]No	
e. American Indian or Alaska Native	%	%	[ ] Yes [ ]No	
f. Native Hawaiian or Other Pacific Islander	%	%	[ ] Yes [ ]No	
g. Individual with a Disability	%	%	[ ] Yes [ ]No	

- Number of new apprentices the sponsor registered since its previous EAPR in each major occupation group. See additional information about this item in the manual (Chapter 5).

Major occupation group	Number of new apprentices registered

3. Record your observations and overall assessment of the sponsor's good faith efforts

_____

4. The sponsor disseminated information to organizations serving each underutilized group regarding the nature of apprenticeship, requirements for selection for apprenticeship, availability of apprenticeship opportunities and the equal opportunity pledge.

Major Occupation Group

Demographic group	Organization(s) serving population to which information was disseminated
a. Women	
b. Hispanic	
c. African American	
d. Asian	
e. American Indian or Alaska Native	
f. Native Hawaiian or Other Pacific Islander	
g. Individual with a Disability	

5. The sponsor has advertised openings for apprenticeship opportunities by publishing advertisements in the following media that have wide circulation in the relevant recruitment areas:

_____

6. The sponsor has cooperated with the following local school boards and vocational education systems to develop and/or establish relationships with pre-apprenticeship programs targeting students from each underutilized group to prepare them to meet the standards and criteria required to qualify for entry into apprenticeship programs:

_____

7. The sponsor has established linkage agreements or partnerships with the following pre-apprenticeship programs, community-based organizations, advocacy organizations, or other appropriate organizations, in recruiting qualified individuals for apprenticeship:

_____

8. After every selection cycle for registering apprentices, the sponsor evaluated and documented the overall effectiveness of its targeted outreach and recruitment activities and refine them as needed.
   [ ] Yes [ ]No

9. The sponsor has undertaken the following optional activities that may assist with addressing any barriers to equal opportunity in apprenticeship:

   a. Enlist journeyworkers from the underutilized group(s) in order to assist in implementing the Affirmative Action Plan **[ ] Yes [ ]No**

   b. Enlist journeyworkers from the underutilized group(s) to mentor apprentices and assist with targeted outreach and recruitment activities. **[ ] Yes [ ]No**

   c. Conduct exit interviews of each apprentice who leaves the apprenticeship program before completion in order to understand better why they left and to help shape retention activities. **[ ] Yes [ ]No**

   d. Other: