

Department of Workforce Development
Employment and Training Division
Bureau of Apprenticeship Standards
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November 2, 2020

Wisconsin Apprenticeship Advisory Council

Monday, November 9, 2020

10:00 AM—Noon

Virtual

Access Information

Link: <https://dwdwi.webex.com/dwdwi/j.php?MTID=ma3f281a4be2ada19d8a04adc60f30272>
Meeting number: 145 365 2499
Password: C8zDamXbm75
Join by phone: 1-855-282-6330 US TOLL FREE
Access code: 145 365 2499

Tentative Agenda

1. Call the meeting to order.
2. Introduce attendees.
3. Review the roster.
4. **For Action:** review and approve the minutes of the previous meeting.
5. **Special Topics:**
 - a. National Apprenticeship Week 2020
 - b. Registered Apprenticeship during COVID-19
 - c. State Apprenticeship Council Alliance
 - d. 28th Biennial Conference
 - e. Scheduling Advisory Council meetings annually
6. **For action: review applications for certified pre-apprenticeship programs**
 - a. Multiple applications submitted by WRTP/BIG STEP
 - b. "Manufacturing and Robotics," submitted by Innovative Educational Solutions Institute
7. **For action: Sub-committee Updates (see the enclosed report with individual action items)**
 - a. Career Pathways
 - b. Educational Linkages
 - c. Equal Access
 - d. Outreach
 - e. Policies and Programs

8. Registered Apprenticeship Updates

- a. [Industry-Recognized Apprenticeship Programs](#)
 - b. Federal grants to expand registered apprenticeship
 - c. Implementing revisions to CFR 29.30 (AA/EEO)
 - d. Revising Transition to Trainer
 - e. BAS personnel update
9. Youth Apprenticeship Update
10. Wisconsin Technical System Update
11. Schedule the next meeting.
12. Adjourn.



Draft Minutes of the Wisconsin Apprenticeship Advisory Council

to DWD, Bureau of Apprenticeship Standards & Wisconsin Technical College System Board

October 14, 2020

Virtual

Members Present	
Barker, Daniel	Ariens Company
Cook, Jim	NECA-IBEW Electrical Apprenticeship
Griffith, Tracey	WI Transportation & Builders Association
Grohmann, Gert	Associated General Contractors, Milwaukee
Hayden, Terry (Co-Chair)	Wisconsin Pipe Trades Association
Hellenbrand, Callie	Alliant Energy
Hurt, Henry (Co-Chair)	Hurt Electric
Jacobson, Gene	PDC Electrical Contractors
Lentz, Seth	Workforce Development Board of South Central WI
McHugh, Shawn	Wisconsin Operating Engineers
Mortenson, Brandon	IAMAW District 10
O'Neill, Hollie	IBEW 2150, WI Electrical Power
Reader, Chris	Wisconsin Manufacturers & Commerce
Seeley-Schreck, Chrystal	Wisconsin Technical College System
Tourdote, Kelly (<i>alternate</i>)	Associated Builders & Contractors of WI
Wieseke, Mark	UAW, Region 4

Members Absent	
Anthony Jr., Ruben	Urban League
Branson, Dave	Building Trades Council, Madison
Daily, Michael	United Steel Workers District 2
Pfannerstill, Kathleen	Toolcraft Co., Inc.
Consultants and Guests	
Abbott, Nick	Bureau of Apprenticeship Standards
Anhalt, Tim	NECA-IBEW
Conklin, Oliva	Bureau of Apprenticeship Standards
Crary, Cary	Bureau of Apprenticeship Standards
Dernbach, B.J.	Office of Rep. Petryk
Galvan, Jose	WRTP / BIG STEP
Johnson, Joshua	Bureau of Apprenticeship Standards
Kasper, Andrew	Bureau of Apprenticeship Standards
Myles, Tommy	Bureau of Apprenticeship Standards
Nakkoul, Nancy	Wisconsin Technical College System
O'Shasky, Lynn	Bureau of Apprenticeship Standards
Popp, Corey	Bureau of Apprenticeship Standards
Pratt, Dawn	Bureau of Apprenticeship Standards
Pusch, Liz	Bureau of Apprenticeship Standards
Rogers, Milton	Bureau of Apprenticeship Standards
Smith, Owen	Bureau of Apprenticeship Standards
Stahlecker, Ben	Bureau of Apprenticeship Standards
Wagner, Mike	NECA-IBEW

DRAFT

1. The meeting was called to order at 10:05 a.m. by Co-Chair Henry Hurt.
2. Mr. Owen Smith recorded attendance.
3. Mr. Smith and the Council reviewed the roster. No changes were necessary.
4. **For action: approve the minutes of the prior meeting**

Action: a motion to approve the minutes as revised was made by Ms. Tracey Griffith, seconded by Mr. Dan Barker, and approved by the Council. Revisions included the following: list Co-Chair Hurt as absent; spell Ms. Griffith's name correctly throughout the document.

5. **For action: review application for certified pre-apprenticeship from BankWorks**

Director Joshua Johnson reviewed the Bureau launched the first registered apprenticeship in the finance sector several years ago: Financial Services Professional. The program has been successful, and the Bureau and partners have been working to establish pipeline programs to it and future finance programs.

Mr. Jim Cook asked how long the Financial Services Professional registered apprenticeship has been active and how many sponsors registered. Director Johnson answered that the program has been active for three years and one sponsor, the primary champion of developing the program, has registered apprentices.

Co-Chairs Hayden and Hurt commented that the application is excellent.

Mr. Mike Wanger asked via chat whether the application could be shared with alternates and other non-Council members. Mr. Smith and Director Johnson replied that the Bureau distributes applications for certified pre-apprenticeships to Council members only because the applications often include confidential information on instructors and personnel.

Mr. Gene Jacobsen asked how the Bureau promotes the Financial Services Professional registered apprenticeship. Director Johnson replied that the program is primarily promoted by the sole sponsor, Principal Financial, which championed the development of the program.

Mr. Smith noted that the first registered apprenticeships in a new sector are often championed and sponsored by a single organization for the first few years. This occurred with the Financial Services Professional, Arborist, and Medical Assistant registered apprenticeships.

Action: a motion to approve the application was made by Ms. Griffith, seconded by Mr. McHugh, and approved by the Council.

6. **Special Topics**

a. **Registered apprenticeship during COVID-19**

Director Johnson thanked all attendees for their respective efforts in continuing registered apprenticeship in formats that ensure the safety of apprentices and personnel. He noted that the Bureau broadly support the discretion of sponsors and related instruction providers in determining how to offer on-the-job learning and related instruction during this unprecedented time.

Director Johnson reported that, overall, approximately 1,000 less apprentices are registered at this time than last year, but certain sectors of the economy have been more adversely affected by the pandemic than others. He asked Mr. Andrew Kasper to review a statistical report that compares contract activity this year versus this time last year.

Mr. Kasper reported that the number of registered apprentices with active contracts has declined in many sectors and most occurred in the utility and service sectors. The number of active contracts this year is noticeably less than this time last year and 2018 but does not stand out within the past 10 years. Fortunately, this year's data do not show a large spike in apprentice cancellations, but the data might show a concerning decrease in the registration of new apprentices.

Director Johnson reported hearing similar reports from across the nation was a sobering moment in the recent virtual conference of the National Association of State and Territorial Apprenticeship Directors. Wisconsin and other states are doing their best to connect workers displaced by the pandemic to registered apprenticeships and family-supporting wages.

Ms. Hollie O'Neill commented that the sharp decline in utility apprentices included in Mr. Kasper's report accurately reflects her experience this year; WE Energies did not hold apprenticeship classes this year for any occupations and froze new hires. She projected that the 2021 cohort will be hired this December.

Mr. Kasper and Director Johnson commented that the Bureau is hoping many sectors will resume registering apprentices this fall and winter.

b. For action: mandatory registration in BASERS as of July 1, 2021

Director Johnson explained that the Bureau invested \$2 million to upgrade its internal database, BASERS, to give all sponsors the ability to perform contract actions online, in real time. This was a significant innovation that positioned WI Apprenticeship to nimbly meet the needs of employers and sponsors. BASERS was implemented, and all sponsors registered in the system can fill out, submit and modify both applications and contracts. This capacity has dramatically reduced errors, communications, payroll disputes on white-sheet jobs, and the overall processing period.

Director Johnson elaborated that the Bureau requires all sole sponsors and new registered apprenticeship programs to register in and perform contract actions through BASERS. The response has been overwhelmingly positive and easy across all sectors of apprenticeship except construction. The few sponsors to object have local construction committees: 94% of local construction committees are registered in BASERS; 71% enter applications via BASERS; and 56% request contract actions via BASERS.

Director Johnson acknowledged that those statistics frustrate him. Part of his frustration occurs because industry-recognized apprenticeship programs (IRAPs) were implemented nationally, in part, because registered apprenticeship was perceived as administratively inefficient. When the Bureau implemented an innovative means of nimbly meeting industry's needs, some local construction committees objected that the Bureau is requiring them to perform the tasks of an apprenticeship training representative. In contrast, sole sponsors across all other sectors have applauded the hands-on, real-time access BASERS provides.

In response, Director Johnson recently emailed a letter to all sponsors that informed them they will be required to register in BASERS as of July 1, 2021. He admitted to the Council that he should have first sought its advice and support.

Director Johnson asked the Council for its advice on and support of his proposal to require all sponsors to register in and perform contract actions through BASERS. He acknowledged that he should have sought the Council's guidance prior to emailing a letter to all local construction committees that required them to register in BASERS prior to July 1, 2021.

Co-Chair Hayden reported that some local plumbing and steamfitting committees are opposed to BASERS. He asked other Council members and attendees to share their perspectives.

Ms. Kelly Tourdot explained that Associated Builders & Contractors sponsors 1,400 apprentices. The organization wants to be helpful, helped extensively with the pilot program, and ultimately found that processing contract actions through BASERS results in double-entering data on a large workload of apprentice contracts. double-enter data double-entry on a large workload of apprentice contracts.

Mr. Jim Cook agreed. He explained that his organization sponsors 900 electrical apprentices, wants to be on the cutting edge, and helped beta-test BASERS. His organization, too, concluded that performing subsequent contract actions, especially transfers, results in substantial double-entering of data. As the administrator and budget manager for his organization, he had to request at least a .5 FTE from his oversight board, which was not received well.

Director Johnson thanked Ms. Tourdot and Mr. Cook for their transparency and assistance, which will help the Bureau identify a resolution that will lead to all sponsors using BASERS in a manner that will does not create double entry of data. He noted that the federal apprenticeship program has used electronic registration for 15 years, which means it is one of the few areas in which Wisconsin Apprenticeship is actually behind the curve. He stated that he wants to position Wisconsin Apprenticeship to conduct all contract actions electronically as well as official communications; that would render the entire administrative process paperless. He argued that the pandemic is showing that virtual business will be the new normal.

Co-Chair Hurt asked whether other states utilize or require online contract management. Director Johnson replied that not many states utilize electronic contract management because they lack the funding and resources that Wisconsin has. However, many states continue to contact the Bureau for advice on how to convert their existing databases to an online registration system.

Ms. Tourdot proposed that the Bureau require all sponsors to only register in BASERS, not perform contract actions, as of July 1, 2020; the additional time would allow large committee sponsors to increase staff to perform subsequent contract actions. She added that ABC has frozen its hiring due to COVID-19 and prioritized serving its apprentices first. The paperless is less of a priority. She also noted that ABC does not have a comparable staff size to a federal agency or the Bureau; Wisconsin has many field and administrative staff. She concluded by reiterating that the data entry workload does scale up for larger local committees.

Director Johnson acknowledged Ms. Tourdot's concerns. He agreed that Wisconsin Apprenticeship has a large field staff—the most in the nation—but the overall staff size does not mean each staff has a light workload. In fact, each apprenticeship training representative (ATR) is responsible for 700-1200 apprentices and at least 50 sponsors. The more administrative time ATRs spend processing contracts via mail, email, fax, and phone, the less they perform quality assessments, compliance reviews, and outreach.

Director Johnson agreed that the Bureau is open to improving BASERS's capacities to upload bulk data and communicate with other databases to eliminate double entry. He reiterated that the Bureau needs to have sponsors perform contract actions through BASERS to eliminate the administrative processing time; long-

distance travel to obtain a single signature is an extreme but frequent example. He suggested that the Council propose a deadline and timeline for technical support.

Mr. Cook countered that the Council should form a subcommittee to discuss the topic further because mandating BASERS would heighten conflict between his organization and the Bureau. He noted that his organization and others do not want to be non-compliant; they agree that starting and finishing apprentice contracts is critical; and they do view mandating BASERS as validly problematic. Enhancing BASERS's capacity to communicate with other databases would be helpful, but his organization's database performs many more operations than BASERS does; it tracks day school and night school and more. He agreed that dovetailing BASERS into his organization's database without compromising confidentiality and security would be ideal, but that is very unlikely to occur prior to July 1, 2021.

Director Johnson thanked Mr. Cook and disagreed with the assessment that BASERS poses a new, additional challenge; the Bureau has always processed contracts in the same sequence and manner; no new steps have been added. Bureau staff would receive an application via email or paper and then create an application. BASERS moves the same process online; ATRs now review electronic submissions.

Action: Co-Chair Hurt called for a motion to move the discussion to a special subcommittee; the motion was made by Mr. Grohmann, seconded by Co-Chair Hayden, and approved by the Council.

c. Presentation on the Bureau of Correctional Enterprises by Mr. Wes Ray

Mr. Wes Ray of the Department of Corrections thanked the Council for welcoming him. He explained that the Bureau of Correctional Enterprises is a revenue-funded operation in the agriculture, logistics, and transportation industries. He would like to share information about the BCE outreach campaign to increase the number and variety of employers that hire formerly incarcerated individuals.

Mr. Ray played an outreach video on the BCE programs for attendees.

Afterwards, he reiterated the foundations of BCE's programs. They emphasize three skills: getting to work on time; being productive; and getting along with coworkers. Participants decide whether to apply, interview, and accept offers. The participants decide every day whether to come to work and perform well; they are proud to participate and work hard to keep the opportunity. The programs use relevant training, materials, and equipment. Interested employers should discuss opportunities with the BCE transition team, whom will help employers match with qualified candidates.

Director Johnson explained that he asked Mr. Ray to present to the Council because the Bureau and BCE have been discussing how to connect incarcerated and formerly incarcerated individuals into registered apprenticeships. Director Johnson added that Mr. Ray is searching for individuals to serve on the Prison Industries Board; the board has historically included representatives of the construction sector. Mr. Ray added that board members are appointed by the Governor. He added his telephone number and email to the meeting chat and encouraged interested individuals to contact him.

Mr. Cook, Ms. O'Neill, and Co-Chair Hayden expressed interest in discussing the programs further.

7. **For action: Sub-committee Updates**

Mr. Owen Smith recommended that, in the interest of time, the Council skip to the action items for the Policy and Programs subcommittee. He noted that the conversation would be led by Mr. Andrew Kasper. The Co-Chairs agreed.

Mr. Kasper reviewed the drafts of the Discrimination and Harassment Compliant Form and the Equal Opportunity questions, related to CFR 29.30, and summarized the input of the subcommittee. A general discussion followed on the input; several subcommittee members explained their rationale for the revisions and expressed support for the revised versions.

Action: a motion to approve the Discrimination and Harassment Complaint Form was made by Ms. Tourdot, seconded by Mr. Seth Lentz, and approved by the Council.

Action: a motion to approve the Equal Opportunity questions was made by Co-Chair Hayden, seconded by Ms. Griffith, and approved by the Council.

8. **Registered Apprenticeship Update**

Director Johnson reported that the U.S Department of Labor announced at the National Association of State and Territorial Directors' virtual conference that National Apprenticeship Week will be held November 8-14. Director Johnson encouraged attendees' organization to host virtual events and notify the Bureau of the events so they can be placed on a statewide calendar.

9. The Council agreed to meet again during National Apprenticeship Week to discuss the remaining items. The Bureau will schedule the meeting via online survey.

10. The Council adjourned at 12:02 p.m.

Submitted by Owen Smith, Program and Policy Analyst

November 2, 2020

TO: WI Apprenticeship Advisory Council

FROM: Owen Smith, Program and Policy Analyst, Bureau of Apprenticeship Standards

SUBJECT: Subcommittees of the WI Apprenticeship Advisory Council

1. Career Pathways

a. Key Discussions

- i. Objective: bridge youth apprenticeship and certified pre-apprenticeship to RA
- ii. Objective: bridge RA to associate degree and technical diploma programs
- iii. Align YA, CPA, RA, AAS and technical diplomas to obtain industry credentials

b. For action: recommendations to the Advisory Council

- i. Include a representative of Youth Apprenticeship in the subcommittee.
- ii. Align future projects for the subcommittee with the SAE grant.

2. Educational Linkages

a. Key Discussions

- i. Align or embed existing RA with associate degree or technical diplomas for dual credentials
- ii. Align and streamline assessments of credit for prior learning between BAS and WTCS.
- iii. Clarify the scopes of this subcommittee and the Career Pathways subcommittee.
- iv. Continue partnering with DPI to increase the K-12 system's comprehension of RA.
- v. BAS should complement, not recreate, the career pathway maps used by WTCS and DPI.

b. For action: recommendations to the Advisory Council

- i. Merge this and the Career Pathways subcommittees to focus on aligning all pathways
- ii. Redesign the "Parents' Guide to Registered Apprenticeship"
- iii. Review survey of CTE teachers
- iv. Resume analyzing the results of DPI's apprenticeship survey of K-12 staff
- v. Streamline DPI's apprenticeship awareness website for K-12 staff

3. Equal Access

a. Key Discussions

- i. Some prior documents are working well, such as the program review guide for CPAs.
- ii. Some prior documents should be revised, such as "Successful Interviewing."
- iii. Some prior documents have not been implemented, such as the "Mentoring Guide."
- iv. The subcommittee reviewed the WTCS Systemwide Equity Report.
- v. The Bureau will be reviewing the phrase, "good faith effort," as it relates to sponsors' outreach.

b. For action: recommendations to the Advisory Council

- i. Develop a separate "Successful Interviewing" guide for all other sectors except construction OR
- ii. Revise the "Successful Interviewing" guide with a separate section for construction.
- iii. Implement the "Mentorship Guide" developed by the Council.

4. Outreach

a. Key Discussions

- i. The demand for outreach is high at this time.
- ii. Outreach activities are infused with substantial grant funding.
- iii. BAS has various outreach advisory bodies with overlapping scopes and participants.
- iv. Outreach efforts should focus across all apprenticeship: YA, CPA, and RA.
- v. Apprenticeship stakeholder should advise on content but leave design to creative professionals.

b. For action: recommendations to the Advisory Council

- i. Inventory existing and needed outreach material.
- ii. Clarify the roles of the subcommittee, ATR outreach subcommittee, Consortium, and LEADERS.

5. Policy & Standards

a. Key Discussions

- i. Reviewed the working drafts of documents related to CFR 29.30
- ii. Discussed draft revisions to the WI Apprenticeship Manual prior to submitting to DWD legal counsel.
- iii. Discussed streamlining BAS and WTCS policy and data systems for dual enrollment, CPA to RA.
- iv. Discussed policy impacts of emphasizing aligning programs through the ASE Grant.
- v. Requested reviewing all draft documents for CFR 29.30 prior to Council meeting.

b. For action: recommendations to the Advisory Council *

- i. **Approve** Quality Assurance / Equal Opportunity field guidance for ATRs
- ii. **Approve** Affirmative Action Template

** Documents will be presented by Mr. Andrew Kasper, Program and Policy Analyst.*

AFFIRMATIVE ACTION PLAN

ADOPTED BY

(INSERT SPONSORS' NAMES OR ORGANIZATIONS)

AS REQUIRED UNDER DWD 296 (AND 29 CFR 30)

DEVELOPED IN COOPERATION WITH THE
WISCONSIN BUREAU OF APPRENTICESHIP STANDARDS

(Bureau Representative - Signature)

(Bureau Representative - Printed Name)

(Title)

(Date)

This affirmative action plan template is provided by the Bureau of Apprenticeship Standards for the convenience of apprenticeship program sponsors. Its use is recommended to promote understanding of, and compliance with, state and federal equal employment opportunity rules at (DWD 296 & 29 CFR Part 30).

Please supply all requested information, unless otherwise directed by the form. If needed, use additional pages to complete responses.

AFFIRMATIVE ACTION PLAN

We, *(enter Program Sponsor)*, adopt this written affirmative action plan (“written AAP” or “Plan”) in good faith to promote equality of opportunity in our registered apprenticeship program. This written AAP is a part our apprenticeship Standards. We also incorporate by reference the Equal Opportunity Pledge contained in the Standards for this program.

This written AAP, which is based upon the minimum requirements for AAP contained in the equal opportunity in apprenticeship state regulation DWD 296 (federally 29 CFR Part 30), is composed of nine key components. Each of these components requires us to examine different aspects of our apprentice workforce and document our review. At various stages of our review, we will analyze our utilization, recruitment activities, and selection, training, and assignment practices in order to ensure that all elements of our apprenticeship program are in accordance with equal employment opportunity requirements.

The key components of this AAP are as follows:

- Section I: Workforce Analysis for race, sex, and ethnicity (by occupational title and by major occupation group);
- Section II: Availability Analysis for race, sex, and ethnicity (by major occupation group);
- Section III
& IV: Utilization Analysis & Goals (for race, sex, and ethnicity)
- Section V: Utilization goals for individuals with disabilities;
- Section VI: Targeted outreach, recruitment, and retention activities;
- Section VII: Annual review of personnel processes;
- Section VIII: Invitations to self-identify as an individual with a disability;
- Section IX: Official adoption of the written AAP.

Abbreviations Key:

Please note that the following abbreviations denoting relevant racial and ethnic groups appear in the demographic charts contained in this written AAP (Appendix C):

Hisp = Hispanic;
AA = African American/Black;
AS = Asian;
AIAN = American Indian or Alaska Native;
NHPI = Native Hawaiian or Other Pacific Islander.

NOTE: For detailed definitions of the above racial and ethnic groups, please see Attachment 1 of the Reference Guide.

PLEASE NOTE: To collect the demographic information on your apprentice workforce requested in Sections I through VIII below, you should consult the data supplied by your program's apprentices and tracked by BAS. Also, to ensure timely compliance with the AAP requirements, you should keep a record of the date(s) on which you completed the analyses and activities described in Sections I through VIII below.

SECTION I – WORKFORCE ANALYSIS FOR RACE, SEX, AND ETHNICITY (BY OCCUPATIONAL TITLE AND BY MAJOR OCCUPATION GROUP)

The apprentice information needed to complete this workforce analysis section is available in the Bureau of Apprenticeship Standards Information System (BASIS) for all Wisconsin registered apprenticeship programs through BAS. Sponsors are encouraged to work with their BAS Apprenticeship Training Representative to complete their workforce analysis.

The following terms are used in this section:

- An **Occupational Title** is a specific occupation that has been assigned an 8-digit “detailed occupation” code in the U.S. Bureau of Labor Statistics’ Standard Occupational Classification and Coding Structure (SOC), <https://www.bls.gov/soc/>, and a corresponding 8-digit code in the Occupational Information Network (O*NET), <https://www.onetonline.org/>. Detailed occupations are defined so that each includes workers who perform similar job tasks based on work performed and, in some cases, on the skills, education and/or training needed to perform the work. For the purposes of completing the workforce analysis, occupation titles are defined by the 8-digit O*NET code. Sponsors can locate the O*NET code associated with their registered occupations from the program occupation tab in RAPIDS.
- A **Major Occupation Group** is the highest-level classification in the SOC, which combines related occupations into major occupation groups. These Major Occupation Groups are designated by the two-digit SOC code and the two-digit prefix of the O*NET code. *(see Attachment 2, “Standard Occupational Classification and Coding Structure” in the accompanying Reference Guide for a complete list of the 23 major occupation groups and their two-digit SOC/O*NET code designations).*

Example: A sponsor has an apprenticeship program that offers training in four different occupation titles: Roofer (8-digit SOC/O*NET Code: 47-2181.00), Electrician (SOC/O*NET Code 47-2111.00), Tool and Die Maker (8-digit SOC/O*NET Code: 51-4111.00), and Machinist (8-digit SOC/O*NET Code: 51-4041.00). In completing Tables 1, 2, and 3 of the workforce analysis below, the sponsor will enter identifying characteristics for their apprenticeship workforce by utilizing the Occupation Titles and the corresponding 8-digit SOC/O*NET Codes for each of those titles.

In completing Tables 4, 5, and 6 of the analysis, however, the sponsor will classify their apprentice workforce by the two Major Occupation Groups that encompass these titles: Construction (2-digit SOC Code: 47) and Manufacturing (2-digit SOC Code: 51).

INSTRUCTIONS FOR COMPLETING THE WORKFORCE ANALYSIS

In completing the tables (1 through 6) contained in this Section I, sponsors should utilize the demographic identification provided by apprentices in their applications. ¹ Sponsors are encouraged to work with the appropriate State Apprenticeship Agency to complete their workforce analysis.

A. Workforce Analysis by Occupational Title for Sex, Ethnicity, and Race

NOTE: The workforce analyses by occupational title for sex, ethnicity, and race contained in Tables 1, 2, and 3 in this Section should initially be completed by the second anniversary of the apprenticeship program's registration with a Registration Agency. Subsequent workforce analyses for sex, ethnicity, and race should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

Instructions:

For each **Occupational Title** in a program, please indicate the total number of **responses** received from apprentices that self-identify for sex, ethnicity, and race in the following tables:

TABLE 1 – Occupational Titles by Sex

Occupational Title	8-Digit O*NET Code	Number of Responses Selecting a Sex		
		Female	Male	Total

¹ Self-identification is the most reliable method and preferred method for compiling information about a person's sex, race, and ethnicity. Sponsors are strongly encouraged to rely on employee self-identification to obtain this information. Please note that while visual observation is an acceptable method for identifying demographic data in the absence of self-identification data, it may not be reliable in every instance, and sponsors should not guess or assume the sex, race, or ethnicity of an apprentice or applicant for apprenticeship.

TABLE 2 – Occupational Titles by Ethnicity

		Number of Responses Selecting an Ethnicity		
Occupational Title	8-Digit O*NET Code	Hisp	Non-Hisp	Total

TABLE 3 – Occupational Titles by Race

Note: For Table 3 below, responding apprentices may elect to choose **one or more** of the specified races. If an apprentice has identified himself or herself as more than one race, count the apprentice in each of the racial categories that he or she has identified.

EXAMPLE: The sponsor of an apprenticeship program for the occupation of Lodging Manager obtained responses from 18 apprentices who identified their racial characteristics. Of these 18 individuals, 2 identified as AS only, 1 identified as both AS and AA, 4 identified as AA only, 1 identified as both AA and White, 1 identified as AIAN only, 0 identified as NHPI, and 9 identified as White only. While the number of respondents is 18, a total figure of 20 should nevertheless be entered in the “Total” responses column due to the selection by some apprentices of more than one race.

Number of Responses Selecting One (or More) Race							
Occupational Title	8-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total
Lodging Managers	11-9081.00	3	6	1	0	10	20

Number of Responses Selecting One (or More) Race							
Occupational Title	8-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total

B. Workforce Analysis by Major Occupation Group for Sex, Ethnicity, and Race

NOTE: The workforce analysis by major occupation group for sex, ethnicity, and race contained in Tables 4, 5, and 6 in this Section should initially be completed by the second anniversary of the apprenticeship program's registration with a Registration Agency. Subsequent workforce analyses for sex, ethnicity, and race should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

Instructions:

For each **Major Occupation Group** in a program, please complete the following sex, ethnicity, and race tables.

TABLE 4 – Major Occupation Groups by Sex

Number of Responses Selecting a Sex					
Major Occupation Group	2-Digit O*NET Code	Female	Male	Total	Female Percent of Total Responses

TABLE 5 – Major Occupation Groups by Ethnicity

Number of Responses Selecting an Ethnicity					
Major Occupation Group	2-Digit O*NET Code	Hisp	Non- Hisp	Total	Hisp Percent of Total Responses

TABLES 6.1 and 6.2 – Major Occupation Groups by Race

Note: For Table 6.1 below, responding apprentices may elect to choose **one or more** of the specified races. If an apprentice has identified himself or herself as more than one race, count the apprentice in each of the race categories that he or she has identified.

For Table 6.2 below, align the Major Occupation Groups and 2-Digit O*NET Codes with the Major Occupation Groups and 2-Digit O*NET Codes completed in Table 6.1, and compute the percentage of total responses within a racial category by comparing the number of responses selecting a particular race to the total number of responses completed in Table 6.1.

EXAMPLE: Using the example above for Table 3, the program sponsor obtained responses from 18 apprentices who identified their racial characteristic. Of these 18 individuals, 2 identified as AS only, 1 identified as both AS and AA, 4 identified as AA only, 1 identified as both AA and White, 1 identified as AIAN only, 0 identified as NHPI, and 9 identified as White only. While the number of respondents is 18, a total figure of 20 should nevertheless be entered in the “Total” responses column due to the selection by some apprentices of more than one race.

Accordingly, to compute the percentage of total responses within a racial category, the sponsor would compare the number of responses selecting a particular race to the total number of responses (20). For instance, in the sample table below, the AS percentage is determined by calculating the proportion of AS responses (3) to the total number of responses (20), resulting in a figure of 15%.

(Please note that the occupational title for “Lodging Managers” that appears in Table 3 above is classified under the “Management Occupations” Major Occupation Group for purposes of this table, with a two-digit SOC/O*NET Code of 11).

6.1 Number of Responses Selecting One (or More) Race							
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total
Management Occupations	11	3	6	1	0	10	20

6.2 Percent of Total Responses					
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI
Management Occupations	11	15%	30%	5%	0%

6.1 Number of Responses Selecting One (or More) Race							
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total

6.2 Percent of Total Responses					
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI

SECTION II – AVAILABILITY ANALYSIS FOR RACE, SEX, AND ETHNICITY (BY MAJOR OCCUPATION GROUP)

NOTE: You should complete this section only in connection with a program review conducted by BAS. BAS will provide you with assistance in completing this section.

A. Minimum Requirements for Program Enrollment

Detail the minimum age and educational attainment qualification required to be eligible to enroll in the major occupation group(s) covered by your apprenticeship program from among the options below.

Education Level:

Age:

Additional Qualifications:

If additional qualifications, credentials, or skills are required for program enrollment beyond those listed above, list them here (please limit the number of characters to 2,000)

NOTE: These minimum qualifications must match what is in the sponsor's standards.

B. Designated Recruitment Area for Apprentices

Select the category below that corresponds to the relevant recruitment area for each major occupation group represented in your program.

Choose One:

- ☐ **External recruitment area** – the geographical area from which the sponsor usually seeks or reasonably could seek apprentices when recruiting from outside of its own current employees. An external recruitment area can be an area within a specific radius of a sponsor's location; a county or counties; or a state or states. Please provide a brief rationale for selecting this recruitment area:

Enter text here

- ☐ **Other recruitment area or source** – a source or geographic area *other* than an external recruitment area from which a sponsor seeks, or reasonably could seek, to recruit apprentices, such as from the sponsor's existing workforce. Please describe this source or area and explain your reasons for selecting it:

Enter text here

C. Specifying the External Recruitment Area

If you are utilizing an external recruitment area please complete the following:

For each major occupation group, we seek, or reasonably could seek, individuals who live in the following jurisdictions:

☐ Counties: County(ies)

☐ States: State(s)

D. Demographic Analysis of Relevant Recruitment Area

The availability analysis, which require use of up-to-date demographic data, can be conducted using Wisconomy or U.S. Census datasets:

- <https://jobcenterofwisconsin.com/wisconomy/query>
- <https://data.census.gov/cedsci/table?q=United%20States&tid=ACSDP1Y2018.DP05&hidePreview=false>

Sponsors may work with their ATR in conducting the availability analysis for the relevant recruitment area. Once complete, the values from the analysis can be used to fill the following tables.

Race					
Asian	African American	American Indian/ Alaska Native	Native Hawaiian/Pacific Islander	White	Available Pop. in Relevant Recruitment Area

Ethnicity		
Hispanic or Latino	Non-Hispanic	Available Pop. in Relevant Recruitment Area

Sex		
Female	Male	Available Pop. in Relevant Recruitment Area

SECTION III & IV: UTILIZATION ANALYSIS & GOALS FOR RACE, SEX, AND ETHNICITY (COMPARING THE WORKFORCE AND AVAILABILITY ANALYSES)

NOTE: It is recommended that the utilization analysis be completed with the assistance of BAS. For new first-time programs, this will occur at the first compliance review after the second anniversary of registration. Subsequent utilization analyses should be undertaken at the time of each compliance review or at least once every three years if a program review does not take place.

A. Utilization Analysis Review

Use the 80 percent/whole person to evaluate whether the utilization of women, Hispanics or Latinos, or a particular racial minority group in your apprenticeship workforce is significantly less than would be reasonably expected given the availability of such individuals for apprenticeship in the relevant recruitment area. This exercise should be conducted for each major occupation group of the apprenticeship program. Under the 80 percent/whole person method, underutilization is identified when the incumbent apprentice workforce is less than 80 percent of the availability by one whole person or more.

For example, underutilization occurs when: $(0.8 \times \text{Availability \% of Demographic Group}) \times \text{Total Apprentices in Major Occupation Group} > 1 \text{ Whole person}$

Total Apprentices in Major Occupation Group = 10

Percent of Asian Apprentices in Major Occupation Group = 10%

Asian Availability = 15%

First, find 80 percent of the Asian availability percentage $(0.8 \times 15 = 12 \text{ percent})$;

Then, calculate twelve percent of the total apprentices in the Major Occupation Group $(0.12 \times 10 = 1.2)$

Now, compare the number of Asians in the group to the result of the previous calculation (1 vs 1.2)

Because 1.2 does not exceed 1 by one whole person or more, a placement goal is not set. If utilization is less than 80 percent of availability by one whole person, it is considered significantly less and utilization goals must be established.

B. Underutilization

If the results of your utilization analysis (Section A above) did not identify any significant underutilization of apprentices by sex, race, or ethnicity in a major occupation group, you may skip this section and proceed to Section V.

Based on the demographic analysis, identify the sex, race, and ethnic group for which the proportion in your major occupation group was significantly less than that group's availability in the relevant recruitment area. Record the results in Table 7 below by indicating "yes" or "no" for the utilization outcomes from your demographic analysis in the second column of the table.

Next, enter the percentage utilization goal for any race, sex, or ethnicity group in which there was significant underutilization. The goal for any such group must at least equal the corresponding availability figure in the demographic analysis, rounded to the nearest whole number. For any row in which the response in the second column is "no," leave the third column blank.

TABLE 7 – Underutilization of Sex, Ethnicity, and Race

Population Group	Significant Underutilization? (Yes/No)	Goal (%) <i>[at least equal to the corresponding figures in the availability analysis]</i>
Women		
Hisp		
AA		
AS		
AIAN		
NHPI		

NOTE: The percentage goals listed in Table 7 above are not intended and will not be used by the program sponsor to discriminate against any qualified applicant or apprentice on the basis of race, color, religion, national origin, sex, sexual orientation, age (40 or older), genetic information, or disability. These goals do not supersede eligibility requirements for this apprenticeship program.

The program sponsor will not use these goals as rigid and inflexible quotas; as either a ceiling or a floor for the selection of members of a particular group(s) as apprentices; or as a justification to extend a preference to any individual, select an individual, or adversely affect an individual's status as an apprentice. Instead, the sponsor

will use these goals as objectives or targets, applying every good faith effort to make all aspects of the entire affirmative action program work and to attain the goals.

SECTION V – UTILIZATION GOALS FOR INDIVIDUALS WITH DISABILITIES

NOTE: The workforce analysis for individuals with disabilities in this section should initially be completed by the second anniversary of the apprenticeship program’s registration with a BAS. Subsequent workforce analyses for individuals with disabilities should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

A. Workforce Analysis for Individuals with Disabilities by Occupational Title

Table 8 below shows, for each occupational title represented in the program, the numbers of apprentices in the workforce whose responses to the question “do you have a disability?” on their most recent voluntary disability disclosure form was “yes;” “no;” or “I do not wish to answer” (or who did not return the form).

TABLE 8 –Disability Status by Occupational Title

Number of Individuals Responding to the Question: “Do you have a disability?”					
Occupational Title	8-Digit O*NET Code	Yes	No	Did not answer or return form	Total Number of Individuals Responding ‘Yes’ or ‘No’

B. Workforce Analysis for Individuals with Disabilities by Major Occupation Group

Table 9 below shows, for each major occupation group represented in the program, the numbers and percentages of apprentices whose responses to the question “do you have a disability?” on their most recent voluntary disability disclosure form was “yes;” “no;” or “I do not wish to answer” (or who did not return the form).

TABLE 9 – Disability Status by Major Occupation Group

Number of Individuals Responding to the Disability Disclosure Form						
Major Occupation Group	2-Digit O*NET Code	Yes	No	Did not answer or return form	Total Number of Individuals Responding 'Yes' or 'No'	Percentage responding 'yes' of the total individuals that responded either 'yes' or 'no'

C. Identification of Potential Impediments for Individuals with Disabilities

The major occupation group(s) in our program in which the percentage of individuals with disabilities was less than seven percent is/are listed in the first column of Table 10 below. For these groups, we reviewed our program to identify any impediments to equal opportunity for individuals with disabilities, with the results shown in the second column. The following are examples of impediments to achieving equal employment opportunity for apprentices with disabilities, which may be utilized in completing Table 10 below.

- Lack of effective outreach
- Inaccessible methods for testing applicants' qualifications or readiness for progression
- Qualifications or other selection mechanisms that disfavor individuals with disabilities and are not job related
- Hostile or unwelcoming work environments
- Different training opportunities or work assignments for individuals with disabilities than others
- Different pay, disciplinary standards, or other working conditions for individuals with disabilities
- Failure to provide reasonable accommodations or information about reasonable accommodations
- Provisions in collective bargaining or employer acceptance agreements
- Other: (fill in the blank)

TABLE 10 – Impediments for individuals with disabilities

Major occupation groups in which the percentage of individuals with disabilities was less than 7%	Impediments for individuals with disabilities
	<ol style="list-style-type: none"> 1. 2. 3.
	<ol style="list-style-type: none"> 1. 2. 3.

SECTION VI – TARGETED OUTREACH, RECRUITMENT, AND RETENTION ACTIVITIES

PLEASE NOTE: Completion of this section is mandatory if you were required to adopt race, sex, or ethnicity goals (under Section IV of this written AAP) or if you found impediments to equal employment opportunity for individuals with disabilities (under Section V of this written AAP). Otherwise, completion of this section is purely optional.

In the coming year, we will undertake the outreach, recruitment, and retention activities listed below. These activities are targeted to the race/sex/ethnicity group(s) for which we adopted goals (as shown in Section IV) and/or to individuals with disabilities (if we found impediments to equal employment opportunity for such individuals, as shown in Section V).

1. We will disseminate information to organizations serving each underutilized group regarding the nature of our apprenticeship program, requirements for selection for apprenticeship, availability of apprenticeship opportunities, and our equal opportunity pledge. BAS and DOL have developed a universal outreach guide to help connect sponsors with local organizations who may be able to assist sponsors in meeting their outreach, recruitment, and retention goals. The guides may be accessed at <https://dwd.wisconsin.gov/apprenticeship/aaeeo.htm> & <https://apprenticeshipusa.secure.force.com/eeoresourcetool>. These organizations and the groups that each serve are listed in Table 11.

TABLE 11 – Organizations Serving Underutilized Populations

Major Occupation Group	Underutilized Population (i.e., Women, AA, HISP, AS, AIAN, NHPI, IWDs)	Organization(s) serving population to which information will be disseminated

2. We will advertise all openings for apprenticeship opportunities by publishing advertisements in the following media that have wide circulation in our relevant recruitment areas:

Enter text here. (Please limit the number of characters to 2,000.)

3. We will cooperate 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 our apprenticeship programs:

Enter text here. (Please limit the number of characters to 2,000.)

4. We will establish 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:

Enter text here. (Please limit the number of characters to 2,000.)

5. After every selection cycle for registering apprentices, we will evaluate and document the overall effectiveness of the above targeted outreach and recruitment activities and refine them as needed. The selection cycle for each sponsor should coincide with the cycle stated in their selection procedures, but in no case should exceed one year. Where none exists, the sponsor and ATR will work together to identify an appropriate cycle period.

[Choose one:]

- ☐ The documentation of the evaluations of these activities that we conducted since the last review is attached to this written AAP; **or**
- ☐ We did not select or register any apprentices since the last review.

6. We *[Choose one:]* ☐ **will** / ☐ **will not** also undertake the following optional activities:

- ☐ Enlist journeyworkers (i.e., experienced workers) from the underutilized group(s) to assist in implementing our AAP.
- ☐ Enlist journeyworkers from the underutilized group(s) to mentor apprentices and to assist with our targeted outreach and recruitment activities.
- ☐ Conduct exit interviews of each apprentice who leaves our apprenticeship program before completion to understand better why he/she left and to help shape retention activities.
- ☐ Other:

[Choose as many as applicable, or none.]

Enter text here

SECTION VII – ANNUAL REVIEW OF PERSONNEL PRACTICES

NOTE: Sponsor's should initially complete this section by the second anniversary of the program's registration with a Registration Agency, and again on an annual basis.

We conduct a thorough, systematic, and comprehensive review of our personnel processes related to the administration of the apprenticeship program annually. Such an annual review ensures that the apprenticeship program is operating free from discrimination based on race, color, religion, national origin, sex, sexual orientation, age (40 or older), genetic information, and disability.

Our reviews have included (but may not be limited to): the qualifications for apprenticeship, application and selection procedures, wages, outreach and recruitment activities, advancement opportunities, promotions, work assignments, job performance, rotations among all work processes of the occupation, disciplinary actions, handling of requests for reasonable accommodations, and the program's accessibility to individuals with disabilities (including the use of information and communication technology).

As a result of our most recent annual review, which was conducted on: *(insert date)*, we made or will make the modifications to the program listed in Table 12 below. Examples of modifications that may improve equal employment for apprentices may include, but not limited to:

- Developing, revising, or enhancing training or information sessions on EEO requirements, and providing a nondiscriminatory, welcoming environment
- Ensuring appropriate disciplinary action is taken against staff or apprentices who engage in unlawful harassment or otherwise fail to provide equal employment opportunity
- Renegotiating or terminating collective bargaining or employer acceptance agreements to eliminate discriminatory policies or processes or otherwise allow the sponsor to address barriers or impediments to EEO
- Taking steps to ensure that compensation in an occupational group does not vary based on any protected category
- Reviewing work assignments to ensure that they do not discriminate on the basis of any protected category
- Ensuring disciplinary standards used within the program do not discriminate on the basis of any protected category
- Other improvement related to Table 10, individuals with disabilities

TABLE 12 – Modifications of Personnel Practices

Modification of Personnel Practices	Date Made or To Be Made

SECTION VIII – INVITATIONS TO SELF-IDENTIFY AS AN INDIVIDUAL WITH A DISABILITY

NOTE: Sponsors should initially complete this section within two years of the program’s registration with a BAS, and again on each occasion that the written AAP is updated.

- ☐ On *(insert date)*_____, we began inviting all applicants for our program, at the time that they apply or are considered for apprenticeship, to disclose if they have a disability.
- ☐ We have continued to invite all applicants to self-identify when they apply, and all accepted applicants to self-identify after acceptance into the program but before they begin their apprenticeships.
- ☐ We use the voluntary disability disclosure form for these self-identification invitations, and keep it separate from the application and the apprentice’s program files.
- ☒ *Every year, BAS reminds all current apprentices that they may update their voluntary disability disclosure form. BAS sends each apprentice a disclosure form on the anniversary of their start date.*

SECTION IX – OFFICIAL ADOPTION OF WRITTEN AFFIRMATIVE ACTION PLAN

1. Adoption by the Sponsor

(where there is no labor union involvement in the sponsorship of the program)

(insert official name of sponsor) _____ adopts this written Affirmative Action
Plan on this *(day)* day of *(month)*, 20 *(year)*.

Signature of Sponsor's Representative

(insert typed/printed name) _____
Typed/Printed Name

(insert date) _____
Date

2. Adoption by Labor and Management Representatives of the Sponsor

(where applicable)

*[Complete below ONLY IF there is joint union-management sponsorship of the apprenticeship program,
and where separate signatures from labor union and management representatives are required.]*

(insert official name of sponsor) _____ adopts this written Affirmative Action
Plan on this *(day)* day of *(month)*, 20 *(year)*.

Signature of Management Representative

(insert typed/printed name) _____
Typed/Printed Name

(insert date) _____
Date

Signature of Labor Representative

(insert typed/printed name) _____
Typed/Printed Name

(insert date) _____
Date

3.6.4 Equal Opportunity

The questions in this section are to ensure that the sponsor is performing each activity required of them under the current version of the state's equal opportunity and affirmative action regulations for registered apprenticeship (Wis. Admin. Code § DWD 296), which were revised in 2019.

Resources for sponsors in meeting compliance with this section can be found on the BAS website: <https://dwd.wisconsin.gov/apprenticeship/aaeeo.htm>. In limited cases, the actions in this section will be undertaken by an employer, rather than a committee. However it is the responsibility of the committee to maintain and furnish the appropriate record during the quality assessment demonstrating compliance where such delegation occurs.

Collect answers to questionnaire Section IX *Equal Opportunity* with the Sponsor.

1. Sponsor has designated an individual to oversee the program's equal opportunity obligations under Wis. Admin. Code § DWD 296.

This individual will be designated to act as a point of contact for BAS for matters related to equal opportunity. The sponsor can designate multiple individuals to execute the equal opportunity functions but must indicate a primary contact. This person's contact information must be entered into BASIS on the sponsor page.

2. Apprentices and apprentice applicants are informed in writing of the procedures for filing an equal opportunity complaint as outlined in Wis. Admin. Code § DWD 296.14(2).

The purpose of this section is to inform all registered apprentices and applicants that they may file a complaint with BAS, the Wisconsin Equal Rights Division, or the federal Equal Employment Opportunity Commission (EEOC) related to discrimination or retaliation in the apprenticeship program. A sponsor may disseminate in writing to apprentices the instructions for filing such a complaint using their own format, or the poster template available on the BAS website AA/EEO page. It is important that this information is conveyed to potential apprentices during the application process, too.

3. The equal opportunity pledge is published in the sponsor's standards, apprenticeship opportunity announcements and other apprenticeship-related materials.

ATRs can obtain a signature from the sponsor on the updated equal opportunity pledge (alternately referred to as the non-discrimination pledge), accessible through the BAS AA/EEO webpage or BASIS, and file the updated pledge as a revision to the program standards. The sponsor should also include the pledge in its apprenticeship job announcements and other publications. The sponsor may use the Apprentice Application – Voluntary EEO Form that is accessible through the "Admin" tab in BASIS and contains the equal opportunity pledge.

4. The equal opportunity pledge is posted in a conspicuous location.

Preferably, the sponsor should post the pledge along with instructions on how to file an external discrimination complaint (see Question 2) using the poster provided through the AA/EEO webpage. However, the sponsor may also meet this requirement by using their own template or document for posting the pledge. A conspicuous location may mean electronically through social media or the sponsor's website, or in a break room, training center, or other location accessible by all apprentices and applicants. If no acceptable location is available, committee-based apprenticeship programs may distribute the document to its employers to post and use online formats.

5. Sponsor has procedures for handling and resolving complaints of harassment, intimidation and retaliation.

In addition to the requirement that apprentices are notified of their recourse for filing a discrimination complaint with outside entities, each apprenticeship sponsor must have a written procedure for receiving and resolving apprentice complaints of harassment, intimidation and retaliation internally. The sponsor must provide a copy of the procedure to the ATR for verification. The human resource policies and procedures of most employers will already fulfill this requirement, so long as they have a complaint process. However, sponsors who do not have a such a procedure, must draft one promptly and provide a copy to the ATR.

a. All individuals involved with the apprenticeship program, including apprentices, administrators and journey workers, have completed a satisfactory anti-harassment training program.

The pre-approved U.S. Department of Labor anti-harassment training program includes a short, five-minute video which can be accessed through the link on the AA/EEO webpage. Other training modules are acceptable so long as the training is interactive in some way (whether in-person or online) and includes the following elements:

- That harassing conduct shall not be tolerated.
- The definition of harassment and the types of conduct that constitute unlawful harassment.
- The right to file a harassment complaint with BAS, the Wisconsin Equal Rights Division or the EEOC (as described in Question 2)

The sponsor must keep a log or other satisfactory record documenting which apprentices, committee members, and sponsor staff and have completed this training and when. For journeyworkers and staff not employed by the program sponsor, the sponsor should share their strategy with the ATR for ensuring their participation.

6. The selection procedures detailed in the sponsor's standards are current and facially neutral.

Each sponsor's method and criteria for selecting apprentices must be detailed in their standards. The selection criteria contained in the standards should reflect the complete and current process and requirements the sponsor uses to select apprentices. The term "facially neutral" refers to absence of any apparent discriminatory criteria or apprentice entry requirements.

a. Sponsor maintains a list of recruitment sources to generate applicant referrals from all demographic groups in the relevant recruitment area.

The sponsor must maintain a list of recruitment sources, along with name, mailing address, telephone number and email address, to distribute its apprentice job openings, or disseminate information about gaining entry into its apprenticeship program. These sources must be updated on an annual basis and reach potential apprentice applicants from all demographic groups in the relevant recruitment area. The relevant recruitment area is defined as the area from which the sponsor usually seeks, or reasonably could seek, apprentices.

If a sponsor strictly recruits and hires apprentices from within, they must demonstrate a strategy for circulating information about apprentice openings and their apprenticeship program to incumbent workers in all potential departments or work areas for recruitment. This may be done by posting information about the apprenticeship program in work or break areas or circulating office emails with this information. If a sponsor has hired a non-incumbent apprentice in the last hiring cycle, they must maintain a list of outside recruitment sources.

For committee-base programs, where the employer performs the recruitment and hiring of apprentices, the committee may maintain the recruitment list and perform periodic outreach on behalf of the employers so potential applicants are aware of how to apply for and obtain an apprenticeship with the affiliated employers.

Examples of recruitment sources include, but are not limited to, local workforce investment boards and job centers, community-based organizations, community colleges, vocational, career, and technical schools, pre-apprenticeship programs, high schools, and federally funded, youth job-training programs. Sponsors are encouraged to use Wisconsin TechConnect and Jobcenter of Wisconsin online recruitment platforms. The AA/EEO webpage also contains a directory of recruitment resources.

b. Sponsor provides advance notice to recruitment sources of apprenticeship openings.

In anticipation of an apprentice opening, the sponsor must provide advance notice, preferably 30 days, to their recruitment sources listed in Question 6a. Sponsors should keep a written log of their apprenticeship job announcements and which recruitment sources received notice of the announcement, including the equal opportunity pledge, and on what date.

7. If the sponsor provides restrooms or changing facilities, those facilities are separate, or single user, to assure privacy between sexes.

If restroom facilities are present, the sponsor must ensure separation of the facilities to ensure privacy between the sexes, or the presence of single user bathrooms.

8. Sponsor maintains the records necessary to demonstrate compliance with this section and Wis. Admin. Code § DWD 296.12

If a sponsor affirms compliance with a question in this section but does not have the documentation or necessary records to demonstrate compliance, the ATR should work with the employer to implement a process to ensure such records are maintained. This may entail coordinating with employers associated with an apprenticeship committee.

9. Describe existing deficiencies and recommendations. (Must be completed for each item answered No, above.)

Enter a description of findings of deficiencies and what you recommend for correction. If this is the first quality assessment administered to the sponsor that contains the equal opportunity section, and deficiencies are identified, the ATR should not use a corrective action plan. Instead, leave the quality assessment as "unfinished" in BASIS while working with the sponsor to address non-compliant questions. ATRs will provide technical assistance and allow the sponsor a reasonable period of time to come into compliance. Once the sponsor is able to demonstrate compliance, the ATR can complete the quality assessment with a "passing" grade. If the sponsor continually struggles to complete the requirements in this section, the ATR can consult their supervisor and consider appropriate measures, such as a corrective action plan.