Conducting Demographic Analyses for Registered Apprenticeship Programs

A Quick Reference Guide for Apprenticeship Sponsors

Office of Apprenticeship

The apprenticeship Equal Employment Opportunity (EEO) regulations require certain sponsors of Registered Apprenticeship Programs to conduct demographic analyses. Registered Apprenticeship Program sponsors that are required to develop Affirmative Action Programs must perform these analyses to verify that all available and qualified talent from different groups have an equal opportunity to participate in apprenticeship programs.

What are Demographic Analyses?

Demographic analyses are the comparison of a sponsor's apprentice workforce by race, sex, and ethnicity (*workforce analysis*) to the composition by race, sex, and ethnicity of the qualified workforce in the recruitment area (*availability analysis*). These analyses provide a data-based approach for sponsors to examine the diversity of their apprentice workforce and identify how well their apprentice workforce reflects the demographics of the community.

How are Demographic Analyses Conducted?

STEP ❶ Workforce Analysis

Registered Apprenticeship Program sponsors analyze the race, sex, and ethnic composition of their apprentice workforce at two levels: 1) by occupational title (8-digit SOC code); and 2) by major occupation group (2-digit SOC code).
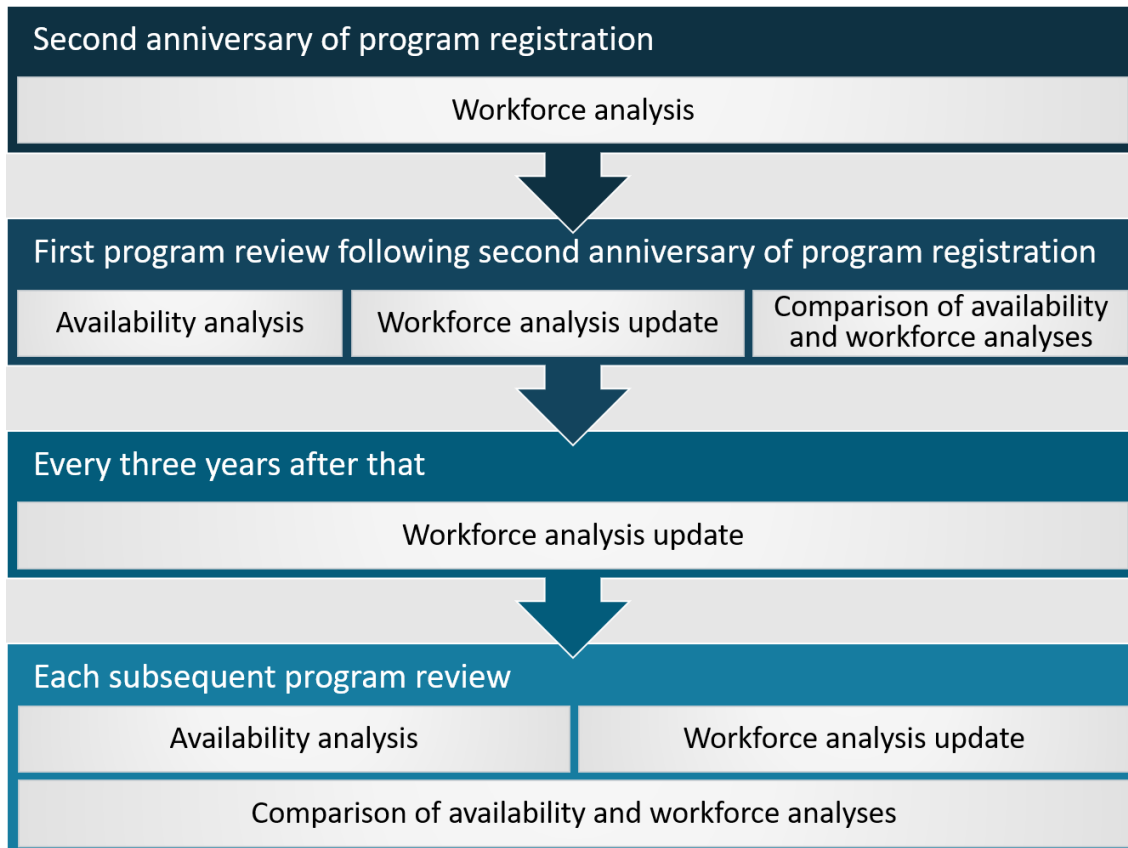
STEP ❷ Availability Analysis

Sponsors identify the race, sex, and ethnicity of the qualified workforce – those individuals eligible for program enrollment – within their recruitment area. The recruitment area is the geographic area from which the sponsor seeks or could seek apprentices.

STEP ❸ Compare the Results

Sponsors compare the workforce and availability data for each major occupation group in the program to determine how closely their apprentice workforce resembles the race, sex, and ethnicity of the available workforce. If the program is underutilizing women or racial or ethnic minorities in a major occupation group, the sponsor will set goals to increase opportunities for the underutilized population(s) and commit to targeted outreach, recruitment, and retention activities to achieve these goals.

When Must Demographic Analyses Be Conducted?

Different portions of the demographic analyses are conducted at different times. Sponsors must conduct their first workforce analysis by the second anniversary of the program's initial registration. Thereafter, sponsors conduct workforce analyses at each compliance review, and again if and when three years have passed without a compliance review. The other portions of the demographic analyses are performed with the Registration Agency during compliance reviews. See the graphic below for the full timeline.

Second anniversary of program registration
Workforce analysis

⬇

First program review following second anniversary of program registration		
Availability analysis	Workforce analysis update	Comparison of availability and workforce analyses

⬇

Every three years after that
Workforce analysis update

⬇

Each subsequent program review	
Availability analysis	Workforce analysis update
Comparison of availability and workforce analyses	

The requirement to conduct demographic analyses is currently in effect for covered sponsors with programs that have been registered with the U.S. Department of Labor's Office of Apprenticeship for two or more years. For programs registered with a State Apprenticeship Agency (SAA), check with the SAA regarding implementation deadlines.

Guide to Using the Demographic Analysis Tool

The Office of Apprenticeship has developed a Demographic Analysis Tool (DAT) to simplify the demographic analyses for sex, race, and ethnicity. This tool is part of the Affirmative Action Plan Builder in the Registered Apprenticeship Partners Information Management Data System (RAPIDS). The DAT is primarily designed for sponsors that recruit externally and use education level as the only requirement for program eligibility. However, all sponsors that recruit externally are encouraged to use the DAT to conduct their demographic analyses and determine their utilization rate for women and racial and ethnic minorities. For sponsors that have

specific program eligibility requirements beyond education level, Registration Agency staff will work with sponsors to consider the validity of the DAT results.

Once a sponsor accesses the Affirmative Action Plan Builder in RAPIDS, the DAT will pre-fill much of the information needed for the demographic analyses. The steps in the process are as follows:

1. The DAT pulls data for the sponsor's apprentice workforce by race, sex, and ethnicity (workforce analysis) from RAPIDS – first by occupational title and then by major occupation group.
2. The sponsor selects the minimum educational attainment requirements for program entry from the drop-down menu.
3. The sponsor identifies recruitment as external, other, or a combination of external and other. If external recruitment is selected, the sponsor then specifies its recruitment area from the drop-down menu.
4. The sponsor selects a methodology for evaluating underutilization – either the 80% method or the two standard deviations method.
5. The DAT fills in the available workforce data (availability analysis) and calculates the differences between workforce and availability for race, sex, and ethnicity (utilization analysis).
6. The DAT then displays any categories of "underutilization" for race, sex, or ethnic groups within the program.

> Refer to the DAT User Instructions within the Affirmative Action Plan Builder in RAPIDS for additional details on using the DAT.

Significant Underutilization: 80% and Two Standard Deviations Methods

The Office of Apprenticeship has approved two methods to evaluate underutilization. Sponsors should select one of these methods and use it for all three characteristics (race, sex, and ethnicity).

Method	Description	Which Sponsors Can Use It?
80% method	Evaluates whether a program's utilization of apprentices for race, sex, and ethnicity is below 80% of that group's availability in the sponsor's recruitment area. If so, the difference is considered significant.	Any sponsor may use the 80% method.
Two standard deviations method	Evaluates whether a program's utilization of apprentices for race, sex, and ethnicity is more than two standard deviations below that group's availability in the sponsor's recruitment area. If so, the difference is considered significant.	Only sponsors with 30 or more apprentices may use the two standard deviations method.

How are Demographic Analyses Conducted for Individuals with Disabilities?

Sponsors will also conduct a workforce analysis on the disability status of their apprentice workforce, using data from the Voluntary Disability Disclosure Form completed by apprentices. This step (the workforce analysis) is the same as for race, sex, and ethnicity – data from the completed forms provides the proportion of apprentices with disabilities in each occupational title and major occupation group. However, no availability analysis is needed for disability. Instead, the proportion of apprentices with disabilities in each major occupation group is compared to an aspirational nationwide goal of 7%. When this comparison shows that the program's inclusion of individuals with disabilities is less than 7%, the sponsor will investigate whether or not impediments to equal opportunity exist. If impediments do exist, the sponsor will undertake targeted outreach, recruitment, and retention activities to increase opportunities for individuals with disabilities in the program.

Reminders About Demographic Analyses:

- The DAT is only effective if the necessary data are in RAPIDS. Sponsors should encourage their apprentices to voluntarily identify their demographic information, and sponsors should keep this information current in RAPIDS.
- All forms containing demographic data should be stored separately from records used for the purpose of recruiting, hiring, or promoting apprentices. Demographic data may not be used for hiring or promotion decisions.
- Goals are simply that: good faith efforts to enhance diversity in apprenticeship programs.

Tools and Resources

If you need:	Use these resources:
More information on demographic analyses	www.apprenticeship.gov/eeo/sponsors/create-your-plan
User instructions for the Demographic Analysis Tool	Log into your RAPIDS account and navigate to the Affirmative Action Plan Builder
Help from your Apprenticeship Office in conducting these analyses	www.apprenticeship.gov/contact-us
Information on identifying and removing impediments for individuals with disabilities	www.apprenticeship.gov/eeo/protected-characteristics/disability
Information on targeted outreach and recruitment	www.apprenticeship.gov/eeo/sponsors/recruit-and-hire
Help encouraging apprentices to disclose disabilities	https://inclusiveapprenticeship.org/guide/phase-2-creating-inclusive-classroom-instruction/encourage-disability-disclosure

Looking for more tools and resources on the EEO regulations? Visit www.apprenticeship.gov/eeo.