



National  
Urban League



National Urban League Case Study and Best Practices Guide

## **Diversity and Inclusion in Registered Apprenticeship**

Delivering Technical Assistance to Employers in EEO, Affirmative Action  
Planning, and Strategic Training



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# CONTENTS

- 5-8 I. Background: Registered Apprenticeship, Diversity and Inclusion, and the National Urban League Consortium**
  - 5 Introduction: Meeting the Demand for Labor and Ensuring a Diverse Workforce
  - 6 A Workforce Solution through the U.S. DOL Registered Apprenticeship Initiative
  - 6 The Importance of Diversity and Inclusion
  - 8 The NUL Consortium: Training Employers in EEO Compliance and Communicating the Importance of Diversity and Inclusion
  
- 9-14 II. Best Practices Toolkit: Technical Assistance Strategies for Diversity and Inclusion Training**
  - 9 Analyze and Summarize EEO Requirements
  - 9 The Bottom Line: The Compliance Timeline
  - 10 The New EEO Guidelines Are Simplified and Better
  - 11 5 Key Components of EEO Obligations for Employers
  - 12 Affirmative Action Planning
  - 13 The Step-By-Step Technical Assistance Strategy
  
- 15-16 III. Best Practices and Lessons Learned**
  - 15 Lessons Learned
  - 15 Best Practices
  - 16 Success Story: Jonathan Counts
  
- 17 IV. Summary**

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# Diversity and Inclusion in Registered Apprenticeship

## I. BACKGROUND

### Registered Apprenticeship, Diversity and Inclusion, and the National Urban League Consortium



### INTRODUCTION: MEETING THE DEMAND FOR LABOR AND ENSURING A DIVERSE WORKFORCE

The United States is facing an ongoing demand for labor in traditional and evolving industries. In traditional industries such as construction and manufacturing, Baby Boomers are retiring without enough skilled workers to replace them. In new and evolving industries, such as the information and communications technology (ICT) sector, new jobs are being created that require specialized skills and training.

The National Urban League, through its consortium with the Multicultural Media, Telecom and Internet Council (MMTC) and the Wireless Infrastructure Association (WIA) (hereafter “NUL” or “NUL Consortium”), is assisting employers with the promotion and diversification of Registered Apprenticeship (RA) programs designed to address workforce needs pursuant to a contract with the U.S. Department of Labor (USDOL). To assist employers in registering and diversifying their workforces, the NUL Consortium provides trainings on the USDOL’s Equal Employment Opportunity (EEO) requirements, assistance with the creation of Affirmative Action Plans, and more.

This case study examines the NUL Consortium’s strategies for providing technical assistance to employers as they seek to promote and diversify their Registered Apprenticeship programs, including a toolkit detailing the NUL Consortium’s strategies for providing technical assistance to employers as they seek to promote and diversify their Registered Apprenticeship programs. It seeks to serve as a replicable guide for other groups such as industry, equity, and opportunity partners, community-based organizations, and other groups or individuals with similar goals.



## **A WORKFORCE SOLUTION THROUGH THE U.S. DOL REGISTERED APPRENTICESHIP INITIATIVE**

The U.S. Department of Labor is working to meet the demand for labor through Registered Apprenticeship, a formalized, government-credentialed approach for preparing workers for jobs through an employer-driven, “earn-while-you-learn” model.

Apprenticeship has been part of the fabric of America since its earliest beginnings. In 1937, U.S. leaders recognized the benefit of apprenticeship for individuals and industry, and formalized apprenticeship through the National Apprenticeship Act. Today, there are over 545,000 registered apprentices in 1,000 occupations nationwide,<sup>1</sup> and employers have hired over 321,000 apprentices since January 2017.<sup>2</sup> The White House has set an ambitious goal to significantly increase these numbers 1 million by 2022.<sup>3</sup>



In 2016, the United States Department of Labor awarded \$20.4 million in contract awards to 14 national industry intermediaries and national equity partners in order to: 1) accelerate expansion of the scope of Registered Apprenticeship programs, 2) increase the number of individuals engaging employment as Registered Apprentices, and 3) achieve diversity and inclusion of previously underrepresented populations (women, persons of color, persons with a disability, etc.).<sup>4</sup>

## **THE IMPORTANCE OF DIVERSITY AND INCLUSION**

Registered Apprenticeship brings numerous advantages to companies and apprentices. In addition to filling labor shortages with tailor-made hires, it increases employment retention and reduces company turnover, and it allows apprentices to access these earn-while-you-learn pathways for long-term careers in sustainable and expanding industries. As companies embrace Registered Apprenticeship as a workforce solution, however, it is important to ensure that diversity and inclusion (D&I) is embedded in their outreach efforts. Although the U.S. unemployment rate in July was just 3.9 percent,<sup>5</sup> it was 6.6 percent for African Americans and 4.5 percent for Latinos.<sup>6</sup> In many majority-minority communities, the disparity in employment outcomes can skew even higher.<sup>7</sup> This underutilized population represents a large, untapped labor force employers can use to fill workforce shortages.

<sup>1</sup> Source: U.S. Department of Labor Apprenticeship Shareables, available at:

<https://www.dol.gov/featured/apprenticeship/shareables>

<sup>2</sup> Source: U.S. Department of Labor, available at: <https://www.dol.gov/apprenticeship/>

<sup>3</sup> Source: U.S. Department Of Labor FY 2018-2022 Strategic Plan, available at: <https://www.dol.gov/sites/dolgov/files/legacy-files/budget/2019/FY2018-2022StrategicPlan.pdf>

<sup>4</sup> The USDOL award announcement is available at: <https://www.dol.gov/newsroom/releases/eta/eta20160921>. The USDOL funding announcement describing its aims is available at: <https://www.doleta.gov/grants/docs/FOA-ETA-18-08.pdf>.

<sup>5</sup> The Bureau of Labor Statistics' more detailed U-6 unemployment rate, which includes all persons marginally attached to the labor force and those employed-part time for economic reasons, places the July 2018 unemployment rate much higher, at 7.9%. The BLS does not break this employment rate down by race and ethnicity. <https://www.bls.gov/news.release/empsit.t15.htm>

<sup>6</sup> <https://www.bls.gov/news.release/pdf/empsit.pdf>

<sup>7</sup> In East Carroll Parish, Louisiana, for example, the unemployment rate is 11.9%, while Yuma County, AZ, has an alarming 19.1% unemployment rate. Those areas are 68% African American and 64% Latino, respectively.

## THE IMPORTANCE OF DIVERSITY AND INCLUSION (Continued)

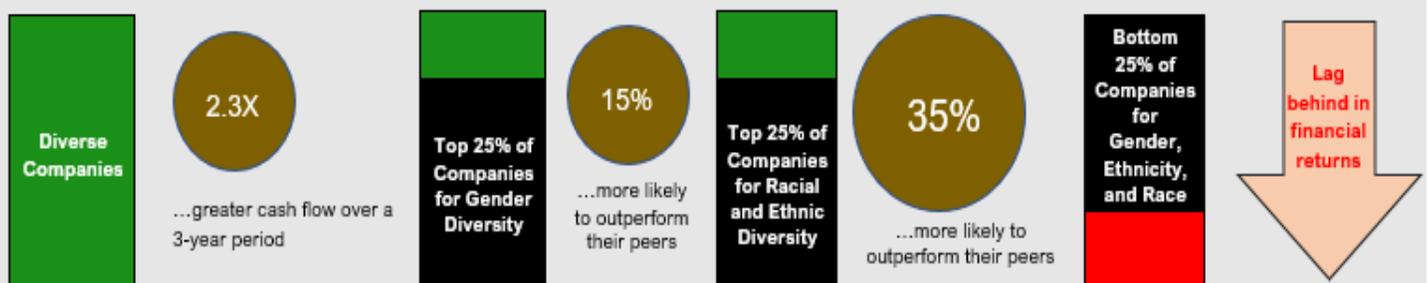
The U.S. Department of Labor recognizes this importance and has included detailed diversity and inclusion requirements for employers who have Registered Apprenticeship programs (known as “Sponsors”).<sup>8</sup> The DOL’s 29 CFR 30 EEO regulations, developed in 1976 and updated in 2016, are designed to help employers attract a larger and more diverse applicant pool, which simultaneously helps bridge skills, labor, and unemployment gaps.

Statistics show that, economically, diverse companies perform better. A McKinsey study links diversity with positive business metrics including productivity, profitability, quality, employee commitment, and retention.<sup>9</sup> Specifically, the study found that the top 25% of companies for racial and ethnic diversity are 35 % more likely to have financial returns above their respective national industry medians; the top 25% of companies for gender diversity are 15% more likely to have financial returns above their respective national industry medians; diverse companies had 2.3 times higher cash flow per employee over a three-year period than non-diverse companies did; and the bottom 25% of companies both for gender and for ethnicity and race lag behind in financial returns. Assessment: As the U.S. expands apprenticeship training nationally, a diverse workplace helps businesses access all of our nation's talent, improving their bottom line.

Further, a focus on workforce diversity is mutually beneficial – there is a workforce shortage in telecom and other growing industries as technology changes, businesses grow, and seasoned workers retire. There are communities where unemployment is high and filled with people ready for jobs that guarantee career growth and advancement. Companies often cite having trouble identifying individuals who are available and ready to work. But targeted outreach, diversity and inclusion planning, and partnerships with local organizations help to bridge this gap. Moreover, companies will find increased value in their workforce by recruiting from a broader pool of candidates.



### The Data: Diverse Companies Perform Better



Source: *Diversity Matters*, by McKinsey & Company, published November 2014.

<sup>8</sup> An RA sponsor is an entity that has its own Registered Apprenticeship program. It can be an employer such as Charter Communications, Inc. (which has its own program) or an industry association such as WIA (which is the sponsor of TIRAP).

<sup>9</sup> Source: *Diversity Matters*, by McKinsey & Company, published November 2014, available at:

<https://www.mckinsey.com/~media/mckinsey/business%20functions/organization/our%20insights/why%20diversity%20matters/diversity%20matters.ashx>

## **THE NUL CONSORTIUM: TRAINING EMPLOYERS IN EEO COMPLIANCE AND COMMUNICATING THE IMPORTANCE OF DIVERSITY AND INCLUSION**



In 2016, the National Urban League (NUL) launched its Consortium through a contract with the Department of Labor's Registered Apprenticeship initiative. NUL works with two subcontractors – the Multicultural Media, Telecom and Internet Council (MMTC) and the Wireless Infrastructure Association (WIA) – and partners with numerous Urban League Affiliates from across the nation to promote and diversify Registered Apprenticeship programs.

Under the ongoing contract, NUL is bridging the wealth, skills, and employment gaps by exposing underrepresented populations to middle-skill jobs through apprenticeships and job-readiness programs that support and strengthen America's most important industries.

In order to promote and diversify Registered Apprenticeship programs and opportunities across industries in which RA is already prevalent, and in nascent RA programs in the ICT Sector, NUL has two principal objectives:

- (1) To work with industry employers and other relevant stakeholders to create Registered Apprenticeships in vocations across numerous industries, including wireless and telecommunications infrastructure, public utilities, construction, manufacturing, healthcare, and transportation; and
- (2) To build and leverage a set of regional partnerships, consisting principally of Urban League Affiliates, in order to recruit underrepresented populations for available employment opportunities through Registered Apprenticeships.

To fulfill these goals, NUL has provided extensive 29 CFR 30 EEO training to its partner Urban League Affiliates and RA employers. This training is designed to assist employers with assuring they are in compliance with 29 CFR 30 requirements as they focus on diversity and inclusion within their apprenticeship programs; and to train UL Affiliates, opportunity partners, and other DOL Industry and Equity partners in assisting employers with 29 CFR 30 compliance.



## II. BEST PRACTICES TOOLKIT: TECHNICAL ASSISTANCE STRATEGIES FOR DIVERSITY & INCLUSION TRAINING



Since the start of its DOL contract in 2016, the NUL Consortium has taken several steps to promote diversity and inclusion in Registered Apprenticeship programs. Through the Telecommunications Industry Registered Apprenticeship Program (TIRAP) – a joint venture of telecommunications companies, the Wireless Infrastructure Association (TIRAP’s National Sponsor), and the Department of Labor that develops DOL-credentialed occupations – WIA has credentialed 22 employers with DOL-certified RA programs.

NUL has worked directly with these employers to help ensure they understand the importance of diversity and inclusion, and that they are in compliance with the 29 CFR 30 requirements under the U.S. Department of Labor

regulations. In addition, NUL works with and trains partner Urban League Affiliates from regions across the country so they can further train employers connected to their own workforce development programs and become better equipped to spread the message. NUL is also working with opportunity partners, which include companies, trade organizations, community-based organizations (CBOs), and educational institutions, with the goal of further spreading the message.

The NUL Consortium’s steps can easily be replicated by DOL industry and equity partners, opportunity partners, and other groups that have a goal of training and spreading awareness of EEO requirements.

### ANALYZE AND SUMMARIZE EEO REQUIREMENTS

The Department of Labor’s EEO guidelines are found in Title 29, Part 30 of the Code of Federal Regulations (“29 CFR 30”), broken down into 19 detailed sections. In December 2016, the Department of Labor released updated 29 CFR 30 regulations to make it easier for companies to come into compliance with the rules and assure they reach a larger and more diverse pool of workers. Prior to the 2016 update,

regulations had not been updated in 40 years, despite a large shift in the nation’s overall demographics.

In order to effectively train companies in how to properly come into compliance with these regulations, NUL recognized that it is important to summarize and translate the legalistic language into its key components.

### THE BOTTOM LINE – THE COMPLIANCE TIMELINE:

Existing RA sponsors have 2 years from the updated regulations’ effective date (January 18, 2017) to develop an Affirmative Action Plan (AAP) in line with the new rule. This deadline is January 18, 2019, after which additional requirements under new regulation will go into effect. New RA program sponsors have up to 2 years from the date they became a sponsor to establish initial AAPs.

The January 18, 2019, deadline is quickly approaching for sponsors of existing programs, and the NUL Consortium offers technical assistance to employers to comply with EEO guidelines and develop Affirmative Action Plans.

## THE NEW EEO GUIDELINES ARE SIMPLIFIED AND BETTER:

Updating and modernizing the rules helps employers to attract a larger and more diverse talent pool, while clarifying and streamlining the regulations makes it easier for sponsors to comply. These changes help bring the regulations into accord with the current landscape of civil rights statutes and developing case law.

The new regulations provide:

- Simplified and clarified instructions and expectations
- Longer deadlines for new apprenticeship programs to develop initial Affirmative Action Plans
- Additional flexibility for all apprenticeship programs in how often they must update their plans
- A more flexible framework for delivering technical assistance
- Guidance to bring apprenticeship programs back into compliance that may not be meeting their responsibilities

## 5 KEY COMPONENTS OF EEO OBLIGATIONS FOR EMPLOYERS:

### 1. Assign responsibility

Each sponsor must designate an individual(s) to oversee the sponsor's commitment to equal opportunity in its apprenticeship program. The person will be responsible for:

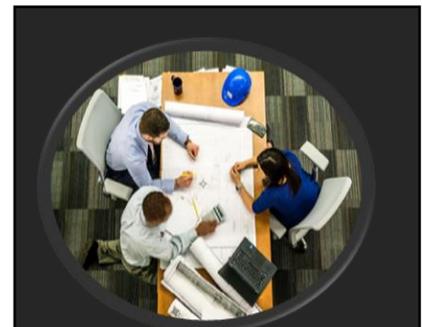
- Monitoring activity to ensure compliance
- Maintaining records
- Generating and submitting reports to the Department of Labor's Office of Apprenticeship or State Apprenticeship Agency (SAA)
- Developing and implementing an Affirmative Action Plan

### 2. Protect employees

Sponsors must keep the workplace free from discrimination, harassment, intimidation, and retaliation using anti-harassment training and complaint procedures. While the previous regulation prohibited discrimination in the recruitment, selection, employment, and training of apprentices on the basis of race, color, religion, national origin, and sex, the updated final rule expands protected groups to include disability, age (40 or older), sexual orientation, and genetic information.

Some examples of prohibited discriminatory actions include disparate employee treatment in areas such as: recruitment, outreach, and selection procedures; imposition of penalties or other disciplinary actions; rates of pay; condition of work; job assignments; leaves of absence; sick leave; and benefits.

In addition, employers must ensure the workplace is free from harassment and other discriminatory behavior.



### Employer Requirements to Ensure Workplace is Free From Harassment and Other Discriminatory Behavior

- Provide interactive anti-harassment training (online or in-person – the Office of Apprenticeship's EEO website has resources available)
- Make facilities and activities available to all
- Establish and implement procedures for handling and resolving complaints of harassment and retaliation



## 5 KEY COMPONENTS OF EEO OBLIGATIONS FOR EMPLOYERS (Continued):

### 3 Required Outreach and Recruitment Steps for RA Sponsors

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

### 3. Conduct broad outreach and recruitment

Employers must provide notice to diverse recruitment sources about openings. Specifically, they must ensure that their outreach to, and recruitment of, apprentices extends to all persons available for apprenticeship within their relevant recruitment area without regard to race, sex, ethnicity, or disability.<sup>10</sup>

There are three outreach steps all RA sponsors are required to take.

Examples of broad recruitment resources include career centers, community-based organizations such as local Urban League Affiliates, community colleges, and vocational schools. To support sponsors in this effort, DOL's Office of Apprenticeship provides a directory of national organizations and umbrella groups that have state or local chapters or affiliates, that may generate referrals from all demographic groups within the relevant recruitment area.<sup>11</sup>

NUL also offers assistance to employers by mapping their locations with Urban League Affiliates in their region, as well as providing lists and contact information for other local recruitment resources.

### 4. Distribute the EEO policy

RA sponsors must conduct and keep records of periodic orientation, training, and information sessions for their designated EEO individual, company staff, and new hires. In addition, they are required to publish and post an Equal Employment Opportunity (EEO) Pledge and information regarding the right of apprentices to file discrimination complaints.

WIAAI provides a link to a customizable EEO Compliance Pledge poster free for download on its website. The EEO Compliance Pledge poster includes information for employees on their rights and how to file complaints.<sup>12</sup>

### 5. Keep detailed records

RA sponsors must maintain detailed records necessary for the state or federal apprenticeship agency to determine if the sponsor is complying with the regulations. These records on apprenticeship selection, program operations, and Affirmative Action Plan steps to increase diversity must be retained for at least 5 years.

Examples of records include:

- Apprentice Selection
- Invitation to apprentices to self-identify as an individual with a disability
- Information about program orientation
- Affirmative Action steps taken to increase opportunities for women, minorities, and individuals with disabilities

## EQUAL EMPLOYMENT OPPORTUNITY PLEDGE

[INSERT SPONSOR NAME] will not discriminate against apprenticeship applicants or apprentices based on RACE, COLOR, RELIGION, NATIONAL ORIGIN, SEX (INCLUDING PREGNANCY AND GENDER IDENTITY), SEXUAL ORIENTATION, GENETIC INFORMATION, OR BECAUSE THEY ARE AN INDIVIDUAL WITH A DISABILITY OR A PERSON 40 YEARS OLD OR OLDER.

[INSERT SPONSOR NAME] will take affirmative action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required under **Title 29 of the Code of Federal Regulations, part 30.**



<sup>10</sup> Apprenticeship programs registered with State Apprenticeship Agencies (SAAs) will be subject to the same requirements after their revised State EEO Plans are approved by the Office of Apprenticeship (OA).

<sup>11</sup> DOL's Outreach and Recruitment Directory is available at: [https://doleta.gov/oa/eoo/outreach\\_recruitment/outreach-directory.cfm](https://doleta.gov/oa/eoo/outreach_recruitment/outreach-directory.cfm)

<sup>12</sup> Use of this particular poster is optional, but if a sponsor prefers not to use it, the sponsor still must comply with the requirements to communicate its EEO Compliance in accordance with 29 C.F.R. § 30.3(b)(2) (EEO Pledge dissemination) and § 30.14(b) (complaints notice).

## Affirmative Action Planning



Similar to the previous rule, larger sponsors work with state and federal registration agencies to develop Affirmative Action Plans (AAPs) to ensure equal opportunity in the recruitment, selection, employment, and training of apprentices. An Affirmative Action Plan is simply a plan outlining the policies, practices, and procedures that a U.S. federal contractor implements to ensure that all qualified applicants and employees receive an equal opportunity for recruitment, selection, advancement, and every other term and privilege associated with employment.

Each employer's Affirmative Action Plan is customized to reflect its unique organizational structure, policies, practices, programs, and data. It typically includes: an organization profile and display reflecting the demographics of its employees; an analysis of job groups and workforce by position; placement of employees within each group; an analysis of the demographics of qualified persons available to fill the company's positions; diverse hiree placement goals; a list of responsibilities for managers, supervisors, and the EEO manager; the identification of areas of concern and corrective actions; action-oriented programs; an internal audit and reporting system; a record of personnel activity by job category (promotions, terminations, layoffs, etc.); a log of the flow of applicants to the company; a summary of year-over-year AAP progress; guidelines on discrimination; and a list of procedures to take when discrimination occurs in the workplace.

Employers are also required to compile and maintain records in support of the AAP. Records may include:

- Collective bargaining agreements and other documents that indicate employment policies and practices;
- Copies of letters sent to suppliers and vendors stating the EEO/affirmative action policy;
- Copies of letters sent to recruitment sources and community organizations; and
- Copies of contract language incorporating the regulatory EEO clause.

The NUL Consortium offers assistance to employers to create effective Affirmative Action Plans for their workforce and to review existing Affirmative Action Plans for their compliance with federal requirements. For example, NUL can provide sample Affirmative Action Plans and other materials to help companies understand how best to meet their diversity and recruitment goals. Additionally, NUL works to help demystify Affirmative Action Planning and dispel some of the myths associated with AAPs.

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#### What Affirmative Action Plans Are:

- Reports on the affirmative steps a company is already taking to attract diverse candidates, such as online outreach and recruitment through local organizations
- A look at where a company stands and how it can grow



#### What Affirmative Action Plans Are Not:

- Quotas
- Requirements to hire unqualified candidates

### Quotas vs. Goals

While companies must conduct a survey of diversity within their workforce and set goals and benchmarks for increasing their diversity metrics, **the only requirement is that progress is measured and tracked** – not that quotas are met. The EEO guidelines require companies to **take affirmative steps toward increasing diversity through broad outreach and recruitment**. This ensures that companies do not feel pressured to hire candidates who may be underqualified for the sake of fulfilling a goal. The broad outreach, recruitment, and selection approach means that companies will attract more diverse, qualified applicants, and workforce diversity will grow organically as more diverse groups apply.

## STEP BY STEP: NUL'S TECHNICAL ASSISTANCE STRATEGY

### Technical Assistance Action Steps

- ✓ Identify and engage with employers
- ✓ Provide trainings on EEO (29 CFR 30) guidelines and compliance requirements
- ✓ Follow up with individual employer meetings and calls
- ✓ Provided a menu of available services
- ✓ Process feedback and incorporate into future trainings and messaging
- ✓ Provide EEO and AAP support to specific companies
- ✓ Connect employers with UL Affiliates with the goal of broad outreach and recruitment

After conducting a thorough analysis of 29 CFR 30 EEO requirements, summarizing, and simplifying the information, NUL undertook a step-by-step strategy to provide technical assistance to employers. The NUL Consortium engaged in the following steps for working with employers to inform and amplify diversity and inclusion importance and requirements:

#### 1. Identified and engaged with employers

NUL developed relationships with the 22 registered TIRAP employers, employers that work with partner Urban League Affiliates, and companies NUL Consortium representatives met at events such as conferences, trade shows, and job fairs. NUL Consortium members had ongoing conversations with TIRAP employers and opportunity partners, discussing the Consortium, the DOL and its goals, the importance of diversity and inclusion, and opportunities to work together to spread the message and increase diversity.

#### 2. Provided trainings focused on diversity and inclusion

In 2018, the NUL Consortium conducted 6 webinars and an in-person training on the importance of diversity and inclusion, methods of amplifying D&I in Registered Apprenticeship, 29 CFR 30 EEO guidelines, and compliance requirements. Webinars were held for numerous audiences, including other DOL-contracted Industry and Equity Partners, Apprenticeship Access Initiative Grantees, Urban League Affiliates, and TIRAP employers. Additionally, the NUL Consortium held an in-depth in-person training.

NUL tailored trainings for each audience, focusing on either direct training for employers on how they can ensure they are in compliance with 29 CFR 30 requirements, or on trainings for Urban League Affiliates and other partners on how they can support employers in EEO compliance and amplify D&I importance.

#### 3. Followed up with individual employer meetings and calls

An NUL Consortium representative held bi-weekly calls with individual employers, offering technical assistance. Directly following the EEO webinars, NUL Consortium members held one-on-one conference calls with employers to provide further details, discuss strategies, and offer assistance with Affirmative Action Planning. In addition to these more generalized bi-weekly calls, the Consortium had calls with employers such as Hightower Solutions and Tilson Technology to discuss specific AAP-development assistance and other offerings.



<sup>13</sup> Six webinars were conducted at the time this case study was published, with a seventh scheduled for prior to the end of the NUL Consortium's 2<sup>nd</sup> contract year.

## STEP BY STEP: NUL'S TECHNICAL ASSISTANCE STRATEGY (Continued)

### 4. Developed a menu of available technical assistance services

Although NUL offered technical assistance to employers, it was discovered that employers did not realize exactly what these offerings entailed. To address this, the NUL Consortium developed a menu of technical assistance service offerings available →

### 5. Processed and incorporated feedback into future trainings and messaging

As the NUL Consortium planned and developed each of its webinars and trainings, it processed feedback from participants to understand how to improve over time. Each training was honed based on this feedback to better address participant concerns and suggestions.

### 6. Provided EEO and AAP support to specific companies

The NUL Consortium had meetings and calls with individual companies to discuss how it could better provide technical assistance tailored to each company's needs. The Consortium is providing ongoing assistance to Tilson Technology in the development of its Affirmative Action Plan. NUL anticipates additional requests for support as the compliance deadlines approach for new and existing employers.

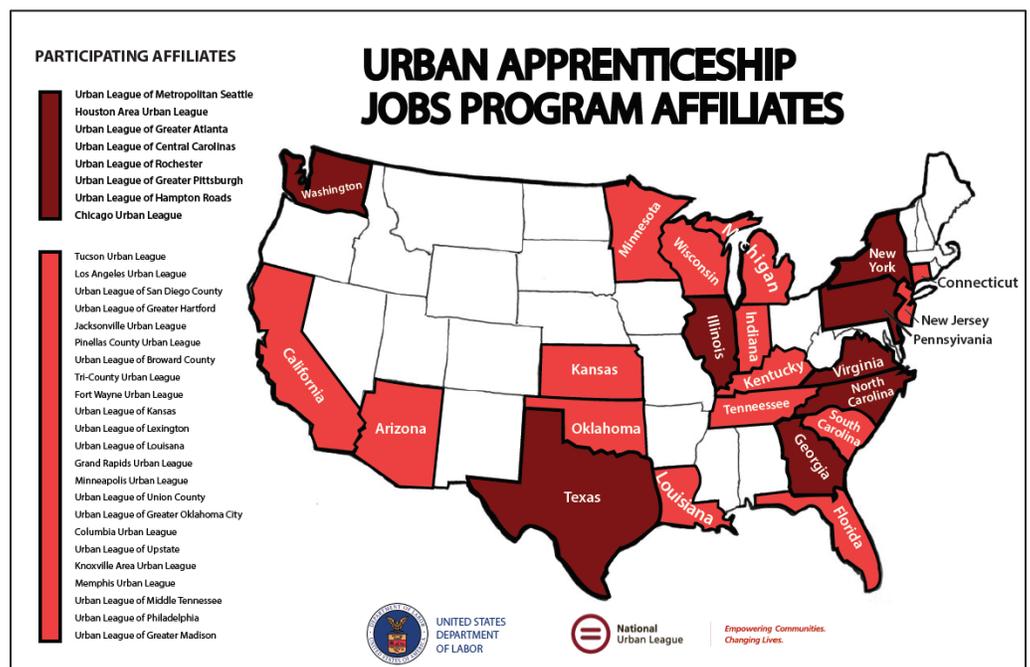
#### Menu of WIAAI Services

- Review of Affirmative Action Plan
- Mapping of Employer Locations with Regional UL Affiliates
- Assistance with Development of Recruitment Sources/Connections
- Customization of EEO Poster
- Assistance with Pre-apprenticeship Sources
- Assistance with Anti-Harassment Training Resources
- Assistance with TIRAP Handbook



### 7. Connected employers with UL Affiliates with the goal of broad outreach and recruitment

The NUL Consortium provided customized mapping for employers, linking local Urban League Affiliates with nationwide company locations and the locations of available positions. The Consortium then connected employers with the local Urban League Affiliate designees so they could provide additional, localized support, including broad dissemination of job postings and referrals for candidates from Affiliates' pre-apprenticeship and job-readiness programs. Affiliates also provide candidates with supportive services, such as childcare and transportation, to best foster on-the-job success.



# III. BEST PRACTICES AND LESSONS LEARNED

As it developed its 29 CFR 30 technical assistance strategy from scratch, the NUL Consortium learned many lessons to improve its delivery and support to employers. Thanks to ongoing discussions with employers, Affiliates, and other entities to which support was delivered, NUL was able to streamline its communication, messaging, and delivery of its technical assistance.

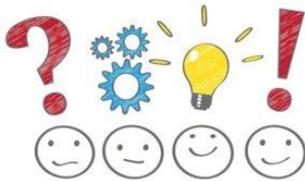
## LESSONS LEARNED

### Too Much Technical Language



Original EEO webinars were too technical and legalistic, and they made 29 CFR 30 compliance sound too onerous when in reality, the requirements boil down to broad outreach and recruitment strategies, and record-keeping of these strategies – actions most employers are already taking. NUL worked to emphasize this, and added language specifically focused on dispelling myths around Affirmative Action Planning and EEO requirements.

### Clarity of Services Offered



The NUL Consortium consistently offered technical assistance support to employers, but through feedback learned that employers were unsure of the specific types of support the Consortium was offering. The Consortium took this into account and developed a menu of service offerings for employers.

## BEST PRACTICES

### Communicate in a Language Companies Speak

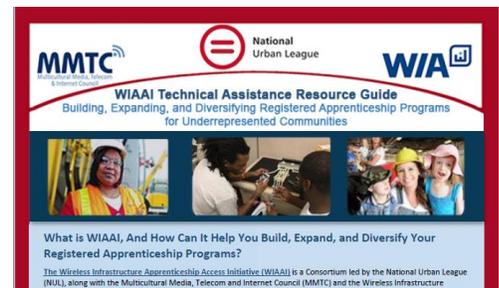
NUL’s initial strategy focused on translating and summarizing the technical 29 CFR 30 language into its key components. Over time, NUL learned that doing this in a language companies speak, with anecdotes, is key in assisting employers. →

### Provide Sample EEO Tools

The NUL Consortium has developed and shared a number of EEO tools to assist employers with understanding the 29 CFR 30 compliance process. These tools include an “EEO Toolkit” to serve as a one-sheet aggregation of information employers can use as they seek to diversify their workforces and Registered Apprenticeship programs, and to comply with 29 CFR 30 EEO requirements. The document features links to all TA tools created by the NUL Consortium, including case studies, an Affirmative Action Plan Guidance document, EEO guidelines and compliance documents, a brochure on RA programs, TIRAP occupations, apprenticeship podcasts, and more. Each of these tools is available on NUL’s Urban Apprenticeship Jobs Program website, [www.nulapprenticeships.org](http://www.nulapprenticeships.org).

### Companies Prefer

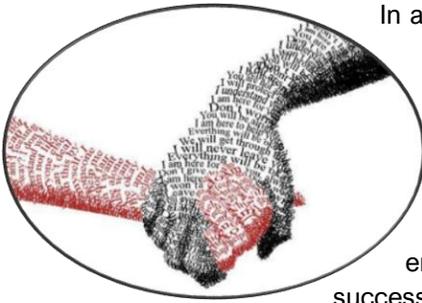
- Simplicity of communication
- Avoidance of language that is too technical, sounds too legalistic, or appears too onerous
- Hard numbers about the (positive) impact on their bottom line
- Success stories that show how active steps toward diversity and inclusion Registered Apprenticeship yield



<sup>14</sup> Details and a toolkit on the NUL Consortium’s use of digital media to promote and amplify Registered Apprenticeship, diversity, and inclusion are available in another NUL case study, “Marketing Registered Apprenticeships Through Social Media: A Case Study and Best Practices Guide on Amplifying Registered Apprenticeship Using Social Media and Digital Platforms,” available on the Urban Apprenticeship Jobs Program website.

## BEST PRACTICES (Continued)

### A Personal Touch: Personalize Positive Messaging through Success Stories



In addition to the simplified language and hard numbers developed and demonstrated throughout this case study, NUL learned that employers are very receptive to and encouraged by success stories. NUL collected success stories from its regional Affiliates about diverse workforce program graduates and their noteworthy accomplishments with TIR AP employers. One such story came from the Urban League of Central Carolinas (ULCC), which has prepared diverse candidates through workforce development and apprenticeship programs for years, and has enjoyed further development of its programs through NUL's USDOL contract. The success story below highlights the diverse talent that employers can access through work with the National Urban League today.

### Success Story from the Urban League of Central Carolinas: Jonathan Counts

Before applying for the Fiber Optic Broadband and Premise Cabling Program at the Urban League of Central Carolinas, Jonathan Counts was working at a local fast food restaurant. With the goal of securing a stable career and supporting his three sons, Counts was ready to seize any opportunity that came his way. He was facing multiple barriers to employment having served two terms in prison, totaling 9 years. These barriers kept him in low-wage positions with little to no opportunities for upward mobility. When speaking with an Urban League representative, Counts realized the ULCC Fiber Program was the breakthrough he had been waiting for. He had a passion for technology, working with his hands, and the starting salary would provide a living wage for him and his family.

Through membership with the ULCC's Fiber Optic Corporate Advisory Council, fiber optic/broadband, premise cabling, and telecom companies are invited to engage with the program and program participants. This process encourages relationship building and partnerships. Most importantly, it makes for a smooth transition from the preparatory program to the apprenticeship onboarding process. This interaction also allows for a close relationship between hiring managers, program graduates, and ULCC support staff.

Counts worked hard in the program and engaged with employers in class and during ULCC industry-specific career fairs, where he participated in mock interviews and resume prep sessions. Counts was hired on Nov. 7 by MasTec, Inc. a leading satellite installation company. For the past 2.5 years of working at MasTec, Counts has been celebrated for his dependable and quality work. Now the manager of a field team of 7, Counts is ranked 6th in the company based on workload and quality metrics.

Since Jonathan's story, ULCC has become further empowered to help countless more individuals to achieve similar success. ULCC worked through the NUL Consortium to apply for official designation of its Fiber Optic Broadband and Premise Cabling program as a credentialed Pre-Apprenticeship program with TIRAP. This designation was granted in early 2018. NUL is currently with ULCC to replicate its program across other UL Affiliates, so companies across the nation can unlock access to a pool of diverse talent that was previously overlooked.



## IV. SUMMARY

The National Urban League created a consortium in 2016 to assist with diversifying Registered Apprenticeship programs under a U.S. Department of Labor contract. The NUL Consortium, with the Multicultural Media, Telecom and Internet Council and the Wireless Infrastructure Association as sub-contractors, has spent the first two years of its contract developing, delivering, and honing technical assistance strategies to train Registered Apprenticeship program employers, as well as partners such as Urban League regional Affiliates, on 29 CFR 30 EEO regulations and requirements for compliance.

### **National Urban League's Technical Assistance Strategies for Training RA Sponsors and Partners**

- Devised Technical Assistance Strategies for Diversity and Inclusion
  - Analyzed and summarized EEO requirements
  - Emphasized the bottom line for employers – the January 19, 2019, compliance deadline
  - Outlined how the new EEO guidelines are simplified and better
  - Outlined the 5 key components of EEO obligations for Registered Apprenticeship sponsors
- Outlined a Step-by-Step Technical Assistance Strategy
  - Identify and engage with employers
  - Provide trainings on EEO (29 CFR 30) guidelines and compliance requirements
  - Follow up with individual employer meetings and calls
  - Provide a menu of available services
  - Process and incorporate feedback into future trainings and messaging
  - Provide EEO and AAP support to specific companies
  - Connect employers with UL Affiliates with the goal of broad outreach and recruitment
- Developed Best Practices and Lessons Learned
  - Lessons learned include staying away from legalistic, technical language and ensuring employers have a clear understanding of technical assistance services offered.
  - Best practices include communicating in a language companies speak, personalizing positive messaging through success stories, and providing sample EEO tools.

The National Urban League encourages other groups to employ its model to provide further assistance to employers across the nation, with the goal of promoting diversity and inclusion in Registered Apprenticeship and other workforce development programs.

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## Authors and Contact Information:

- Marcella Gadson, Director of Communications, MMTC  
[mgadson@mmtconline.org](mailto:mgadson@mmtconline.org)
- Maurita Coley Flippin, President and CEO, MMTC  
[mcoley@mmtconline.org](mailto:mcoley@mmtconline.org)
- Dr. Rikin Thakker, Vice President of Telecommunications and Spectrum Policy, MMTC  
[rthakker@mmtconline.org](mailto:rthakker@mmtconline.org)

## About the Consortium Members:

**The National Urban League** (NUL) is an historic civil rights organization dedicated to economic empowerment in order to elevate the standard of living in historically underserved communities. NUL serves as a Department of Labor Office of Apprenticeship Equity Partner and has cultivated apprenticeship opportunities in the areas of seven of its 90 Regional Affiliates. [www.nul.org](http://www.nul.org) and [www.nulapprenticeships.org](http://www.nulapprenticeships.org)

**The Multicultural Media, Telecom and Internet Council** (MMTC) is a nonprofit organization with a 30-year track record of increasing diversity in media and telecommunications access, ownership, and employment. MMTC develops and implements the curriculum, technical assistance, and training and marketing material for DOL-approved occupations under the WIAAI Consortium, and conducts program evaluation. [www.mmtconline.org](http://www.mmtconline.org)

**The Wireless Infrastructure Association** (WIA) is the principal trade association representing over 230 companies that build, own, upgrade, and maintain the U.S. wireless communications network. WIA's role in the Consortium is to provide access to Registered Apprenticeships through identified and committed employers. [www.wia.org](http://www.wia.org)

**For more information on WIAAI assistance with building, diversifying, and expanding your RA program, contact Brandi Pray, NUL Manager, Workforce Development, at [bpray@nul.org](mailto:bpray@nul.org).**