

**Proposed Recommendations to Increase the Number of
Women in the Building Trades**

Commissioned by:

Advisory Committee of Apprenticeship

**Ad-Hoc Workgroup on Increasing the Number of Women in the
Building Trades**

Presented to:

**United States Department of Labor
Employment and Training Administration
Office of Apprenticeship**

2016

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I Executive Summary

History

29 Part 30 was modified to include women in the 1970s. In the years since a variety of approaches have been tried to move the needle on increasing the number of women in apprenticeship, specifically in the building trades. These efforts included the creation of the Diversity Team of the mid 90s, Federal Committee on Apprenticeship subcommittee and Intermittent WANTO funding. Most recently there was an ACA briefing in 2015 and efforts to increase diversity continued into 2016. There have been some variance in female participation rates but it has remained relatively steady around 2.5 percent for the last twenty years.

Key Opportunities for Impact

Key opportunities for impact were identified and consolidated into three main areas: outreach and recruitment, training and retention and compliance. Several themes were consistent across all of the challenge areas. The overarching commonalities include:

Existing resources should be more widely promoted, distributed and more easily available through known and reliable points of contact within the apprenticeship and workforce development community. The expertise that exists in Tradeswomen's organizations has produced extensive recommendations and demonstrated statistically significant gains for women in the building trades and having this be recognized and incorporated into practice throughout the National Apprenticeship System would help take these proven strategies to scale.

Creating an effective mechanism to address complaints, gather feedback on problem areas and systematically identify the most egregious breakdown of equal opportunity within the National Apprenticeship System will assist with concentrating resources on eliminating major barriers. Ensuring a safe mechanism for female building trades apprentices to report violations so they are not vulnerable to retaliation, particularly as they need a green light at several levels (subcontractor, contractor, business agent, business manager) to continue working or be placed on a new job, will allow violations to become more visible and be addressed. Greater transparency in EEO data and universal EEO review reporting will allow sponsors with exemplary performance to be rewarded and those with poor performance to receive guidance.

Strategies to ensure both supply and demand of adequately prepared female candidates for apprenticeship should be developed. EEO in apprenticeship should be viewed as a workforce development issue for communities/regions rather than be viewed locally as a compliance issue with individual sponsors.

Goals for women, demonstration of EEO principals and a "gender lens" should be included in apprenticeship expansion efforts, funding streams, Job Corp, YouthBuild, ApprenticeshipUSA marketing materials, apprenticeship and other ETA grants, in funding for pre-apprenticeship programs and training provided by OA and associated with Registered Apprenticeship.

Setting the tone for women to be accepted as professional tradesworker equals, will mean that inequitable treatment is not tolerated and will ameliorate unconscious bias or lack of cultural competence. Eliminating inequity within every aspect of the apprenticeship experience including outreach and recruitment, selection procedures, training classes, work hours and on the job training will lead to greater registration and retention of women. Addressing inequality is hard work and needs to be consciously and consistently included on the agenda in order to increase the participation of women and other underrepresented groups.

General Recommendations for Action and Impact

Prioritize the recommendations that can be initiated immediately.

Include a statement in OA Deputy Director and Division Director annual performance standards to “Build off the success of the WANTO program by requiring States and organizations to engage, recruit, and service under-represented populations, with a particular emphasis on increasing representation of women in apprenticeship programs”. Identify one Deputy or Division Director as lead for OA on this issue.

Implement recommendations that require locating and posting USDOL grantee supported or created resources on the OA website with links to these resources from other OA and ETA webpages within six weeks of the submission of this report.

Identify and disperse funds to implement SAA training identified in this document, integration of women welcome messaging throughout ApprenticeshipUSA and expansion of web-based resources.

Create a high level intra-agency team to continue this effort with recognized subject matter experts.

II Introduction

Numerous attempts have been made to address the lack of improvement in participation rates of women in the building trades. A federally funded program, Women Apprentices in Non Traditional Occupations (WANTO) has sporadically provided limited amounts of funding to support a variety of strategies to increase the number of women, particularly in the building trades. This has been the sole funding source targeted specifically to support women in nontraditional careers within USDOL. While there have been some successful WANTO programs there has never been a sustained or significant campaign to support a national effort to address this entrenched problem. WANTO, while struck from the FY17 budget proposal, has partially funded several pre-apprenticeship programs and supported the development of technical assistance material and two regional assistance centers. In localities that have had access to established/experienced pre-apprenticeship training centers (Chicago Women in the Trades, Oregon Tradeswomen Inc., Nontraditional Employment for Women, NEW, in New York City) the number of women in the trades has increased significantly. In other parts of the country unfunded volunteer collaborations (Policy Group on Tradeswomens Issues (PGTI) in Boston, Minnesota Tradeswomen, Mississippi Women in the Trades) are creating successful strategies and can identify local areas of concern and advocate for legislation and policies to support both supply and demand for women in the trades.

The minor wave of tradeswomen that swept into apprenticeship programs in the mid-70s are at the twilight of their life changing careers. Many of them are dedicated to improving the situation for the sisters that came behind them. With the advent of social media it has become easier for tradeswomen to communicate among themselves, share information about successes and support each other in times of stress. For the all too common isolated women, alone on a job site, there are increasing virtual support opportunities provided by unpaid volunteers, most frequently other tradeswomen.

The challenges faced by women trying to learn about construction, get into a building trades apprenticeship program and survive into retirement are well known to the tradeswomen who have chosen this path. Decades of reports, papers, studies, articles and research return to the same issues over and over again. The work of this ad-hoc group did not uncover new challenges or identify solutions that have not been previously expressed. The difference this time may hinge on the availability of electronic tools to gather and disseminate targeted information to the national apprenticeship community and the political will to lift up and thoroughly integrate the message that women are welcome here.

III Opportunities, Challenges and Recommendations

OUTREACH AND RECRUITMENT

Create quality, targeted outreach and marketing material, with a “gender lens”

Print and electronic media portraying the construction trades, including information on building trades apprenticeship, should include positive images of women trades workers. These images should clearly be women truly engaged in construction activities. Having professional women in outreach and informational material sends a strong message to all women about their opportunities in the construction trades, the message – you do belong here!

Suggested solutions:

1. USDOL should implement digital strategy that promotes construction careers for women
 - a. Videos – solicit videos from tradeswomen talking about their careers in construction; should be organic/real stories, not produced by DOL; could be made on iPhone, tablet, etc.; pick the best to promote through DOL social media; Incentivize participation by some sort of contest
 - b. USDOL Twitter – regular tweets about women in construction
 - c. USDOL blogs – feature women in construction; could include tradeswomen-generated video clips
 - d. PSAs
 - e. National Apprenticeship Day – develop and disseminate social media campaign materials to specifically target women in NTOs; USDOL should encourage States and OA to publicly recognize best performers in increasing women in the building trades, showcase them at National Apprenticeship Week events, invite them to conferences and roundtables, highlight in publications, etc. Develop a strong and clear strand of the

ApprenticeshipUSA brand which shares the inclusive message “Apprenticeship is for Everyone” or “Apprenticeship Looks Like America” and incorporate it thoroughly in marketing and National Apprenticeship Week material.

2. Develop gender targeted marketing material including posters that feature women in construction – could post in One-Stop career centers and be available to other users by download from DOL site

Increase the knowledge/expertise in marketing to women by Apprenticeship Programs, Agencies and Sponsors

State Agencies charged with promoting registered apprenticeship, providing technical assistance to sponsors and potential sponsors as well as the apprenticeship programs (and pre-apprenticeship programs) would benefit from technical assistance to increase their knowledge on marketing, particularly to selected targeted populations within their local area. Providing templates, how to guides and content options to Apprenticeship staff, sponsors and other allies of apprenticeship can begin to address this challenge.

Suggested solutions:

3. Develop orientation curricula for apprenticeship program staff on outreach to women; could be promoted through DOL/WB/OA-hosted webinars and/or promote TAC curricula/webinars (see Oregon Tradeswomen Inc. attachments inserted)
4. Expand number of and funding for Technical Assistance Centers
5. USDOL should provide links to organizations that represent and serve women, people of color, and other underrepresented on DOL’s website.
6. USDOL should reference on its website the technical assistance tools and materials developed by WANTO grantees that can be used to facilitate sponsors’ outreach, recruitment, and retention efforts
7. USDOL should publish contact information for tradeswomen organizations that can provide best practice resources and technical assistance to programs in industries in which women are under-represented to inform their outreach, recruitment, and retention activities

General lack of preparation for women in the building trades.

When women do learn enough about building trade apprenticeship programs and express interest in them they may find it difficult understand the varied and multi-phased application procedures and may lack a basic understanding of the type of work they will be expected to perform of the physical conditioning to assure success at the work. Without reliable sources of information on apprenticeship targeted to women, specifically pre-apprenticeship programs, the number of women who have a working knowledge of a construction trade, are able to navigate the complexities of a selection procedure and obtain work in the trade may remain under 5%.

Suggested actions:

1. Expand number of and funding for Technical Assistance Centers
2. Expand funding for pre-apprenticeship programs to target women
3. Encourage CTEs, Community Colleges and other post-secondary institutions with construction trade programs to create formal linkages to registered apprenticeship programs (pre-apprenticeship).

Women are not educated about opportunities in the construction industry

The current low numbers of women in the construction trades, their lack of visibility, the lack of awareness of the high skill, high wage opportunities in construction (minus the college debt) and the somewhat arcane selection procedures required to gain entry all combine to create a kind of awareness void for women relative to the opportunities that exist in the building trades.

Suggested actions:

1. Encourage DOE and other federal agencies to link to DOL resources on their respective sites (especially on DOE CTE pages (if any)).
2. USDOL should closely connect with Veterans' Employment and Training Service (VETS) to obtain assistance in outreaching to women vets.
3. Encourage career education that includes formal and informal apprenticeship information and orientation sessions describing what is entailed in the apprenticeship, the work to be performed, the requirements and processes for applying, what constitutes a competitive candidate, and explanations of the selection process. These sessions can be particularly useful if they are held at the apprenticeship site (although not exclusively) and include opportunities for potential applicants to meet with women.

TRAINING AND RETENTION

Improving women's retention, advancement and leadership in apprenticeship, in the union and on the job is critical to achieving equity for women in these fields. While there are many variables involved in assessing women's retention in the industry, it appears that women lag just a few percentage points behind men in terms of graduation rates, but many drop out just a few years later. Recent interviews with women graduating from or otherwise leaving apprenticeship found that, while there has been some improvement in conditions for women in the trades, lack of equitable on-the-job training and employment opportunity continue to derail many women's careers. Other issues, including sexual and other forms of harassment, isolation from co-workers and work expectations that can, at times, be incompatible with raising children, also continue to be barriers for many women. While some have been successful, women in general have not become integrated into the favored crews that work the most stable hours and the most overtime, and instead, continue to be among the last hired and first fired. If a company is not invested in a new apprentice, they are unlikely to receive quality training and, as the years go by, it gets more and more difficult and discouraging to find that next job and meet contractor expectations. Women apprentices are particularly susceptible to not completing their apprenticeship programs given the unique barriers they face throughout their apprenticeships, including isolation, harassment, discrimination, stereotyping, micro-inequities, and a lack of training rotation on the job.

Targeted retention measures are therefore necessary to confront these obstacles. OA should offer guidelines on retention outlining efforts sponsors must undertake to increase retention rates.

Inequitable training on the job i.e. assigning to menial job tasks

1. Set standards for on-the-job training and carefully monitor apprentices' work assignments and attainment of competencies. To ensure such equitable opportunities have been afforded, apprentices should undergo a review prior to their transition to the next year of their apprenticeship and an "exit interview" upon completion.
2. UPAT mentoring material, recruitment and retention work is being done by NBT, program Standards include monitoring for equitable training.
3. Assign female apprentices to a mentor.
4. Reference best practice guidelines for program staff, instructors and On-The-Job Training (OJT) journey workers and supervisors, such as the "Inclusive and Equitable Classrooms, Instruction and OJT" training guidelines and materials and other online resources at "The Midwest Technical Assistance Center."ⁱ
5. Train apprenticeship personnel and journey workers on effective gender inclusive and neutral teaching practices that extends to both classroom-related instruction and worksites - CWIT has materials.
6. Transition to Trainer: This curriculum was developed by the State of Wisconsin apprenticeship system to assist with retaining apprentices. It is designed to teach experienced workers how to pass on their skills to the new worker, and is available to use free of charge, "a gift to the apprenticeship community from the State of Wisconsin." Attached.
7. Hire women and minorities in leadership positions, as project superintendents, engineers, supervisor and crew leaders.

Gaining acceptance as equals on the job

1. Promote professional development activities for apprenticeship staff and sponsors on cultural competency to raise awareness of how beliefs and actions about women in the trades impact retention.
2. Training on cultural competency complements EEO/AA policies by providing personnel a set of tools, knowledge and skills to take into the classroom, a Joint Apprenticeship and Training Committee (JATC), and the worksite.
3. Establish guidelines for equitable workplace environments that promote respect and inclusion.
4. Conduct training for supervisory personnel and workers on how to foster and support a workplace that is culturally competent, respectful and inclusive.
5. Create awareness and training on being an ally to underrepresented populations - see: **being an ally (publication)**.
6. Conduct training for female apprentices on surviving and thriving in a male-dominated environment – see CWIT publication Tools for Success.
7. Incorporate into apprenticeship training awareness on Health and Safety from a Gender Lens- **<http://www.jff.org/initiatives/greenways/pink-green-toolkit-section-6>**
8. **Fair Amount of Work: Relationships & mentoring:** Most apprentices work in a teamwork or crew environment. Thus, an apprentice's ability to have a good working relationship with their

co-workers is critical for the apprentice to learn, perform and be successful. When the relationship building is left to chance or to the apprentice, barriers of race and gender may get in the way of the apprentice becoming a true part of the work crew. Mentorship programs could contribute to apprentices from underrepresented groups gaining the crew connections and social guidance needed to be successful.

9. Adopt recommendations of the Advisory Committee on Occupational Safety and Health in its report “Women in the Construction Workplace: Providing Equitable Safety and Health Protection. <https://www.osha.gov/doc/accsh/haswicformal.html>. This report, known as the HASWIC Report, found that temporary facilities on worksites are usually unisex, often without privacy, and are generally not well maintained. Sometimes there are no sanitary facilities available for women to use. Due to the lack of facilities, women report that they avoid drinking water on the job, risking heat stress and other health problems. The HASWIC Report recommends, among other things, that gender-separate, external and internal locking sanitary and changing facilities be provided on worksites, that employees be allowed to use such facilities as needed and be provided keys for gender appropriate facilities, that the toilet facilities be maintained in a sanitary condition and in good repair (e.g., with working locks), that clean toilet paper be provided within reach of the toilet, and that hand washing facilities be located within close proximity to toilet facilities to ensure privacy between the sexes and support safety and health measures.

Lack of work and Lack of critical mass on the job sites

1. Promote EEO hiring and diversity goals in Community Benefit Agreements, PLA’s, contracts- See:
 - CWIT’s publication, *Drafting the Blueprint* offers a step-by-step process that leads to the development of a blueprint for workforce equity services. CWIT has three publications that outline best practices and examples of where it’s worked
<http://chicagowomenintrades2.org/resources-3/cwit-publications/>
 - <http://chicagowomenintrades2.org/mtac/wp-content/uploads/2015/06/Best-Practices-Supporting-Equal-Opportunity-in-Construction-FINAL-8-2014-3-2.pdf>,
 - <http://www.policygroupontradeswomen.org/>
2. Replicate best practice models for site-based goals, monitoring and technical assistance, examples are Viking and Boston UMASS, which have good data to show this works.
3. Jobs for Justice is doing report on best practices, we need to amplify and replicate this message.
4. Increase impact of Megaprojects, strong hiring goals, more synergistic collaboration. Use the Dodge report that gives OFCCP an earlier heads-up on mega projects coming.
5. Ensure that women comprise 20% or other negotiated number/percentage of apprentices employed by the company (e.g., CWIT/Chicago Regional District Council of Carpenters proposed initiative).
6. Retain apprentices hired through the Equity Partners program for a minimum of one year assuming availability of work.
7. Promote DOL-OFCCP E.O.11246 that at least 2 women are present on a job site.

8. Promote a nationwide, more accessible complaint/feedback option - Hot line.
9. Watch out for, and discuss with your employers if you find that minority and female apprentices are getting laid off sooner and thus not getting the hours to advance. With lay-off choices sometimes being the responsibility of a mid-level supervisor or superintendent, unintended biases or personal friendships may influence unknowingly their lay-off choices, resulting in fewer work hours for apprentices from underrepresented groups.

Lack of support

1. Establish targeted and consistent mentoring programs and initiatives through union apprenticeship programs, and contractors - Sample forms for enrolling mentors and program agendas are available at: <http://chicagowomenintrades2.org/mtac/apprenticeship/training/> IUPAT has mentoring material, program standards include monitoring for equitable training.
2. Promote, convene and support attendance at Conferences Women Build Nations, gender-specific mentoring for women and minority groups, such as the IBEW Electrical Minority Caucus, Carpenter's Sisters in the Brotherhood, organizations such as Oregon Tradeswomen. These offer a chance to learn survival and success skills in a safe environment from those from the underrepresented group who have been successful.
3. Create tradeswomen support groups in A/U/E. Establishing and engaging tradeswomen groups by union or industry offers numerous ways for tradeswomen to get support and act in a unified manner to improve women's status in their sector (examples of committee agendas, conferences and publications are available to download see: [sistersinthebrotherhood](#))

These support groups and more formal committees are designed to:

- Promote increase and diversity in women's numbers and retention through the creation of a supportive environment at the apprenticeship school, at the local union level, and on jobsites.
 - Promote the trade to women and support union/apprenticeship staff in outreach.
 - Provide a networking/linkage opportunity.
 - Provide mentoring and support for each other.
 - Identify issues, propose and advocate for solutions.
 - Build a visible community of tradeswomen.
 - Foster women's increased representation and leadership in union activities.
 - Offer sample contract language or policy for training programs to promote equitable and family-friendly practices.
 - Host conferences, meetings and social activities.
4. Educate union members, apprentices see: [being an ally \(publication\)](#)
 5. National Building Trades for Stewards training, more training for job site personnel.
 6. Promote examples of women and underrepresented groups in materials and throughout the training facility and OJT worksites;
 7. Strive to hire a diverse teaching and support staff;
 8. Build Work/family supports into apprenticeship standards (i.e. how to handle pregnancy leave during apprenticeship) Develop personnel policies that meet the needs of families.
 9. Support for informal support groups, peer counseling and networking activities.

10. Identify practices to avoid isolating individuals from underrepresented groups.
11. Provide an orientation or “boot camp” for new apprentices that helps them prepare for industry expectations and culture around attendance, performance, appropriate work behavior and work ethic, as well as deepen their understanding of the trade and job site environment.
12. Help for issues or concerns: Make sure apprentices know where to get help for issues or concerns that might arise. Apprentices need to know who to go to if they experience difficulties. This could be an apprentice rep, the apprenticeship coordinator, an apprentice liaison, apprenticeship instructors, a job steward, an employee assistance program or a mentorship program. In general, women and minority apprentices have trouble speaking up for themselves and don’t want to rock the boat by complaining, so need to have spelled out for them very clearly the safe and proper channels to get help.
13. New worker has an assigned go-to journey worker. May not work every day with them, but is that experienced worker’s responsibility to help the new worker understand expectations, get questions answered, be safe, get settled in.
14. Ombudsperson – a person of authority, recognized by the JATC, to be an apprentice liaison, to assist the apprentice with apprenticeship or job site issues that come up such as low scores on math test, harassment on the job, understanding construction culture, make sure the apprentice is receiving adequate training, as well as assist the employer in communicating job site expectations or mediating worker to worker conflicts.

Sexual Harassment

1. Embed NABTU Gender Lens curriculum to address sexual harassment into apprenticeship training curriculum <http://www.iff.org/initiatives/greenways/pink-green-toolkit-section-5>
2. Provide training using curriculum to address sexual harassment to union and employer personnel – on site, at union meetings or convenings.
3. Provide train the trainer training and teacher guide to contractors’ supervisory staff and union leadership (business managers, stewards, organizers) (CWIT has train the trainer materials.
4. Conduct training for female apprentices on surviving and thriving in a male-dominated environment – see CWIT publication **Tools for Success**

Lack of leadership and advancement opportunities

1. Identify opportunities and criteria for leadership positions.
2. Promote career pathways information.
3. Provide Coaching, Job Shadowing, Mentoring, to support leadership advancement opportunities

COMPLIANCE

Discrimination in hiring and training practices

Examples include women being told there were no openings, women not being given credit in interviews for equivalent education or work experience, non-validated entry tests being used to measure physical strength, requiring knowledge of industry- specific tools, female apprentices not being given job lists to find jobs under “intent to hire” process when male apprentices are given a list, etc. In addition to these are some of the most more blatant examples, and do not address the unintentional biases that may also exist in the marketing material, informational sessions or and interview and selection processes. Treatment of women in related instruction and during on- the- job training is sometimes uneven, and there are frequent reports of women working in isolation, with no journey worker assigned to train them;; women working significantly fewer hours than male apprentices;; and women assigned simple tasks for longer periods of time and therefore not being fully training at the completion of the apprenticeship. The combined effect is women entering and completing apprenticeship training in the building trades at rates below every other industry. Suggested solutions:

1. The unions, contractors and business partners of Sponsors, be they individual employers, parties to Employer Participation Agreements, Signatory Contractors or other parties to an Apprenticeship Agreement or Standards of Apprenticeship would benefit from education regarding their EEO responsibilities relative to Registered Apprenticeship, which in most cases is similar to their responsibilities as employers and unions under Title VII of the Civil Rights Act of 1964, including the Uniform Guidelines for Employee Selection Procedures (UGESP) and under state EEO laws and as contractors under Executive Order 11246. This could be accomplished by OA and SAA State Directors informing all existing Sponsors of these responsibilities; the National Office using an email blast to deliver similar information during National Apprenticeship Week; and/or sharing resources about anti-discrimination requirements on a dedicated webspace. Existing training resources used by OFCCP and EEOC to address discrimination could be incorporated.
2. It would also be helpful if the EEOC and OFCCP affirmatively did training on identifying and preventing discrimination for apprenticeship staff (differentiating between the EEO training that OA staff get as government employees and the specific areas that sponsors and apprenticeship staff need to be knowledgeable about to ensure safe and welcoming workplaces for apprentices).
3. Teach OFCCP and other agencies about the requirements for EEO in Registered Apprenticeship and share TA resources available.
4. Create an Interagency Council (to include OA, WB, OFCCP, EEOC, DOT, Commerce, Energy, DOD) to investigate the underutilization of women in the building trades. This group might work to define “under-represented or nontraditional” consistently and suggest solutions that would work in other “nontraditional” fields such as energy, manufacturing, transportation, IT, safety and protective services. A good model exists with the Federal Interagency Reentry Council, which coordinates and sparks government programs to promote reintegrating ex-offenders into

civil society. See <https://www.justice.gov/reentry/federal-interagency-reentry-council> and GAO's study of this Council, <http://www.gao.gov/assets/670/660952.pdf>.

5. Provide On-Line Continuing Education for Sponsors, consisting of Great Apprenticeship Aides and Fact Sheets for Sponsors on relevant topics such as: Setting and meeting goals, Targeted Outreach, Tips to ensure equitable supervised on-the-job training, How to track attendance and work progress reports, How to measure performance in related instruction, and a Checklist for Annual Self-Assessment; and make this material available to all sponsors on the OA website. Share these aides widely with SAAs, education partners, intermediaries and other partners.
6. Encourage States and OA to publicly recognize best performers in increasing women in the building trades, showcase them at National Apprenticeship Week events, invite them to conferences and roundtables, highlight in publications, etc. If possible, incentivize awarding of grants, contracts or other resources to Sponsors with a proven record of success. Develop a strong and clear strand of the ApprenticeshipUSA brand which shares the inclusive message "Apprenticeship is for Everyone" or "Apprenticeship Looks Like America" and incorporate it thoroughly in marketing and National Apprenticeship Week material.
7. OA can host an Employer Roundtable to provide employers the opportunity to develop solutions to this problem.
8. Agencies cannot address discrimination if they do not know about it. Complaints are an important source of such information for agencies. It would be very helpful to increase apprentices' awareness of complaint procedures and to provide resources to support women on completing and filing complaints in a timely manner. An important part of ensure that timely complaints are filed, moreover, is ensuring that they are investigated on a timely basis.
9. Develop relationships with National Partners, such as the National Building Trades Apprenticeship Directors Committee, that can assist in developing and rolling out training to address workplace discrimination. The International Foundation, a group of Union Apprenticeship Directors who meet with management every two years, is a possible partner, as is the National Building Tradeswomens Committee.
10. Collaborate with Federal and State Government Agencies that are experts in this area.

Lack of EEO Compliance Reviews

Many SAA states do not conduct regularly scheduled EEO reviews, as required, and the reviews that are conducted may not include the analysis outlined in 29.30. Some states may not have adopted regulations consistent with the current 29.30.

Suggested solutions:

1. Circulars determine Standard Operating Procedure for the USDOL. It would be helpful if OA ensures that Circulars are delivered to the parties listed and that the parties listed understand their legal significance.
2. OA could create a national sense of urgency and generate buy-in regarding the impact of our national apprenticeship system compliance efforts with state agencies and sponsors. Reviewing

relevant business practices, the exposure that a state agency or sponsor could face if discrimination goes unaddressed including potential large financial liability in sex and race discrimination cases (including sexual harassment) (such as the NY SMW settlement, LA County Sheriff).

3. An annual email blast to all sponsors with five or more apprentices, reminding them of the need to perform an annual assessment and including contact information for their local ATR/State Director, would be helpful.
4. Work with NASTAD to create a joint SAA and OA EEO compliance training plan and review calendar, include as a priority in OA FY 18 Performance Standards. Verify that all states have EEO in Apprenticeship regulations.
5. Track and report EEO reviews and including participation rates, to provide transparency and accountability so the lowest performers may be identified and corrective action taken. This will also allow for identification of best performers and possibly new best practices.

Lack of support/guidance/training on how to conduct compliance reviews

Conducting EEO Compliance Reviews is the most complex aspect of the Apprenticeship and Training Representatives job and is the foundation for the federal grade 12 job classification. An ATR needs to be able to assess every aspect of sponsor outreach, selection criteria including minimum qualifications, interview process and records, they must be able to analyze the progress of apprentices through the training program and compare results of subpopulations for signs of disparate impact and offer appropriate technical assistance to increase the overall success in training a diverse populations of apprentices. Actions performed by a sponsor as “good faith efforts” should produce a measurably positive outcome.

While OA has had the resources over the past few years to train new Apprenticeship and Training Representatives and State Directors there still remain a significant number of long term employees involved with program development and administration who have not received even basic training on 29.30. For State Directors and Regional Directors several years, in some instances decades, have passed since they have performed an EEO review or received or delivered specific training on conducting EEO compliance reviews. Similarly, SAA states often lack the time and resources to adequately train their staff on state EEO regulations and how to conduct a comprehensive EEO review. In addition, due to high turnover in both SAA and OA States, staff who had been trained on conducting compliance reviews have left the agency and current staff do not have the capacity to train or conduct the reviews.

Suggested actions:

1. Share all current OA Training material on conducting compliance reviews with SAA staff, consider making this material publically available to sponsors and the public at large.
2. As resources allow, prioritize face to face EEO review training to SAA staff, particularly new State Directors and Directors not previously trained and experienced in performing federally compliant EEO reviews. Include an OJT component that includes OA Multi-State Navigators

accompanying SAA staff as they prepare for and perform their initial field EEO review. MSN then continues as resource.

3. Train OA and SAA staff to identify and offer Technical Assistance which will assist Sponsors in addressing gender bias in delivery of both OJT and RI.
4. OA and SAA need to be trained to perform the analysis necessary to determine if lack of work is a compliance issue for women and people of color. Unequal distribution of work, including overtime hours, impacts wages earned, program retention and completion rates so should be considered in both quality and compliance reviews.
5. Incorporate Circular 2016-04 (includes some guidance on Good Faith Effort) and Circular 2016-05 into basic ATR training immediately.
6. Prepare a training plan and training material to train OA ATRs and SDs and SAA SDs on the application of the revised 29.30 for current and future apprenticeship sponsors. Deliver this training to OA within 6 months of release of revised regulations. Within 18 months to SAA partners.
7. Develop and specific guidance and training on “Direct Entry” options.

IV Ad-Hoc Committee Members

V List of Resources

TO: MEMBERS OF THE APPRENTICESHIP COMMUNITY

FROM: CONNIE ASHBROOK, EXECUTIVE DIRECTOR, OREGON TRADESWOMEN, INC. 503-335-8200 x 22
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SUBJECT: ELEMENTS FOR RECRUITING AND RETAINING DIVERSE APPRENTICES

DATE: APRIL 9, 2011

Elements for recruiting and retaining diverse apprentices

Three Principles of Effective Recruitment

1. Repeated contact with your intended audience.
2. Clear next step for them to take.
3. Build relationships for trust and word of mouth recruiting.

Five Key Actions to Recruit for Diversity

1. A marketing plan that reaches your desired audience with a message targeted to them.
2. Nurture diverse applicants so they feel welcome and stay motivated throughout the sometimes long application process.
3. Keep diverse applicants connected to your industry, so they continue to be interested and gain industry knowledge and skill.
4. Feed the pipeline by reaching the younger generation.
5. Build relationships with those your desired audience trusts.

Action One

Reach Your Desired Audience with a Targeted Message

- Target with the image itself; show successful women and minority workers from your industry. This makes it clear you are interested in reaching those groups.
- Target through where it is posted or sent or presented. For instance to Girl Scouts, minority advocacy or service groups, minority or women oriented news media, or minority or women oriented events.
- Target by who gives the message. Women and minorities from your industry are the best recruiters and spokespeople to reach a diverse audience.
- People need to hear/see the message more than once in order to respond. Cultivate your audiences with regular repeat messages over time.

Action Two

Nurture Your Female and Minority Applicants

- Have women and minorities from your industry be part of orientations. This shows women and minority applicants that they are welcome and can be successful. It connects them to important mentors for when they get started.
- Inform applicants that women and minorities are welcome and successful in your industry during orientation or application. This message from a respected industry leader sets the tone for the whole group as well as the individual minority or female applicant. This message can help applicants stay interested and motivated throughout the sometimes long and difficult application process.
- Arrange a follow up phone call to them from females or minorities from your industry. This also provides an opportunity to begin a mentoring relationship, and a chance to ask questions that applicants may not feel comfortable asking in public or of a white male.
- Encourage those who do not score well to apply again through a letter or phone call; call or write again periodically or just before your next opening to encourage re-application. You have worked hard to get minorities and women thru your door, make this effort continue to pay off by retaining potential candidates. Make sure they know of actions they could take to improve their scores or chances of being selected.

Action Three

Keep Female and Minority Applicants Connected to Your Industry

- Ask your employers to hire the best female and minority candidates in entry-level positions such as material handler, warehouse or yard helper so that they gain skills and remain interested.
- If your industry has a women's group or minority caucus, send the applicant an invitation to their next meeting.

Action Four

Feed the Pipeline by Reaching the Younger Generation

- Adopt a school that has a large minority population, and sponsor their team.
- Teach workshops about your industry at schools or youth groups; taught by women and minorities from your industry. Target youth groups that serve minorities or girls.
- Host field trips to your offices or to job sites for groups of young women and minority youth.
- Provide summer internships for high school aged young women and minority youth.

Action Five

Build relationships with those your audience trusts

- Join organizations that represent various minority groups such as the Urban League, Metropolitan Hispanic Chamber of Commerce, Tribal organizations, etc.
- Send a representative to speak about your industry and opportunities.
- Attend and support events such as dinners, International Women's Day celebrations, Martin Luther King Day events, pow-wows, etc.

Example: 5-Step Marketing Plan for Reaching Diverse Applicants

- Ads featuring photos of women and minorities from your industry with a message inviting women and minorities to apply – run 4-6 times a year in general news media as well as news media that serves minorities or women.
- Create a poster and brochure with photos of women and minorities from your industry and mail 4-6 times a year to community groups, employment offices, libraries, community centers, etc.
- Brochures and cover letter mailed to women and minorities in your industry several times annually asking them to refer their family and friends – take advantage of word of mouth recruiting.
- Post images of women and minorities and a welcoming message on your web site.
- Staff your career fair booth and orientations with women and minorities from your industry.

Five Key Action Steps Apprenticeship Programs Can Take for Effective Retention of Women and Minority Apprentices

1. **Orientation:** Provide an orientation or "boot camp" for new apprentices that helps them prepare for industry expectations and culture around attendance, performance, appropriate work behavior and work ethic, as well as deepen their understanding of the trade and job site environment.
2. **Welcoming job site environment:** Assist your employers to create a respectful and welcoming job site environment, including defining expectations of employers who have the privilege of using apprentices, teaching about best practices for training apprentices, and providing employers with information about the economic costs of apprentice cancelation (a 2009 study of apprentice retention in the Cincinnati area estimated that apprentice attrition was costing local industry over \$7 million annually). A job site that helps new apprentices feel welcome,

confident in what is expected of them, a part of the crew, and knowledgeable about how to work safely, gains a more productive worker.

3. **Skills training:** Make sure your employers provide apprentices with the opportunity to learn more technical aspects of the trade on the job; carefully monitor to make sure minority and women apprentices don't solely do grunt work and are learning the practical on-the-job skills that lead to being a valued worker. Women and minority apprentices may find themselves relegated to sweeping up, moving materials or doing simple repetitive tasks. In order for minorities and women to become good hands, employable, and confident in their skills, they need to learn more technical aspects of the trade. While not practical to train every apprentice on every aspect of the trade on the job, apprenticeship programs can set the standard for on the job training and carefully plan with their employers for all apprentices to grow in their skill.
4. **Help for issues or concerns:** Make sure apprentices know where to get help for issues or concerns that might arise. Apprentices need to know who to go to if they experience difficulties. This could be an apprentice rep, the apprenticeship coordinator, an apprentice liaison, apprenticeship instructors, a job steward, an employee assistance program or a mentorship program. In general, women and minority apprentices have trouble speaking up for themselves and don't want to rock the boat by complaining, so need to have spelled out for them very clearly the safe and proper channels to get help.
5. **Fair Amount of Work:** Watch out for, and discuss with your employers if you find that minority and female apprentices are getting laid off sooner and thus not getting the hours to advance. With lay-off choices sometimes being the responsibility of a mid-level foreman or superintendent, unintended biases or personal friendships may influence unknowingly their lay-off choices, resulting in fewer work hours for apprentices from underrepresented groups.
6. **Relationships & mentoring:** Most apprentices work in a teamwork or crew environment. Thus, an apprentice's ability to have a good working relationship with their co-workers is critical for the apprentice to learn, perform and be successful. When the relationship-building is left to chance or to the apprentice, barriers of race and gender may get in the way of the apprentice becoming a true part of the work crew. The following mentorship elements could contribute to apprentices from underrepresented groups gaining the crew connections and social guidance needed to be successful.
 - **New worker job site orientation:** Very complete orientation to the job site and its expectations on the first day/week on the job: how to be safe, attendance expectations, appropriate work behavior, etc. Best for those giving the orientation to follow a check list – sometimes job site expectations are so assumed by the established worker that they are not communicated and they trip up a new worker. (see checklist from the State of Wisconsin's "Transition to Trainer" job site mentoring curriculum at the end of this document).

- New worker has an assigned go-to journey worker. May not work every day with them, but is that experienced worker's responsibility to help the new worker understand expectations, get questions answered, be safe, get settled in.
- Culturally or gender-specific mentoring for women and minority groups, such as the IBEW Electrical Minority Caucus, Carpenter's Sisters in the Brotherhood, organizations such as Oregon Tradeswomen. A chance to learn survival and success skills in a safe environment from those from the underrepresented group who have been successful.
- Harassment-prevention: JATCs can train employers on prevention techniques, set the tone at related-training, and thru curriculum designed to train apprentices on the value of a harassment-free environment.
- Ombudsperson – a person of authority, recognized by the JATC, to be an apprentice liaison, to assist the apprentice with apprenticeship or job site issues that come up such as low scores on math test, harassment on the job, understanding construction culture, make sure the apprentice is receiving adequate training, as well as assist the employer in communicating job site expectations or mediating worker to worker conflicts.
- Transition to Trainer: This curriculum was developed by the State of Wisconsin apprenticeship system to assist with retaining apprentices. It is designed to teach experienced workers how to pass on their skills to the new worker, and is available to use free of charge, "a gift to the apprenticeship community from the State of Wisconsin."

Note: Apprenticeship Programs have little direct authority to mandate on-the-job aspects of retention, but could have standards for training agents, training for new training agents, provide forums for their training agents to discuss best practices in training and in retaining minority and female apprentices, and could have trainings for employers that would include how to develop retention processes.

Apprentice Orientation Checklist from "Transition to Trainer" Wisconsin's job site mentoring curriculum

Make sure the following items are addressed with the apprentice sometime during the first week on the job site. The list may vary depending on the individual trade, the role of Human Resources, and the time the apprentice has been on the job.

- ☐ Overall organization: apprentice's relationship to the company
- ☐ Job duties
- ☐ Introductions: Who's who?
- ☐ Personnel policies
- ☐ Performance evaluations
- ☐ Related instruction/school schedule
- ☐ Terminology
- ☐ Employee handbook

- ☐ Tour (restrooms, eating facilities)
- ☐ Location of work area
- ☐ How to operate telephone
- ☐ Necessary supplies and equipment
- ☐ Safety procedures
- ☐ Fire extinguishers
- ☐ Keys
- ☐ Personal appearance, dress code
- ☐ Personal protective equipment
- ☐ Attendance, punctuality
- ☐ Work hours; time sheets
- ☐ Breaks; lunch
- ☐ Pay procedures
- ☐ Overtime
- ☐ Who to call in the case of illness, tardiness, etc.
- ☐ Relationship to other trades
- ☐ Filling out the work reports or card



ⁱ *Midwest Technical Assistance Center, Chicago Women in Trades,*
<http://chicagowomenintrades2.org/mtac/>