

ABA Employer Resources Guide

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INTRODUCTION

This guide is designed to help employers prepare for bringing on apprentices and set them up for success. When employers have a positive experience with the Registered Apprenticeship (RA) model, they are more likely to agree to foster more RA Programs and hire additional apprentices. For Apprenticeship Building America (ABA) grantees, retaining RA employers in the long run is key for grant sustainability.

Since there are numerous resources available through the Office of Apprenticeship (OA) and state apprenticeship offices, intermediaries or others, this guide does not focus on apprenticeship registration. We have included several resources below that will be helpful to supporting employer sponsors through the registration process. What is most important is each employer/sponsor does not go at it alone.

- ▶ Office of Apprenticeship – [Registered Apprenticeship System](#) (includes links to State Apprenticeship Agencies)
- ▶ Office of Apprenticeship – [Express Interest](#) (Connect with an OA Apprenticeship Consultant)
- ▶ Office of Apprenticeship – [Registered Apprenticeship Industry Intermediaries](#)
- ▶ Office of Apprenticeship – [Register Your Program](#)
- ▶ [A Quick Start Toolkit: Building Registered Apprenticeship Programs](#)

How to Use This Guide

This guide has eight “one-pagers” (two are slightly longer than one page), each one a complete resource in and of itself. They have been designed using the ABA logo, colors, and brand so that they can be utilized by all grantees and are print-ready to hand out to employers. These documents can also be emailed separately to employers as attachments. See the instructions below for how to separate this PDF into separate PDF documents for printing or emailing.

To Save Specific PDF Pages

- ▶ In Acrobat, Choose File > Print.
- ▶ In the Print Range pane of the Print dialog box, type the page numbers of the corresponding pages you want to save. For a range of pages, use a hyphen. Separate each page or range with a comma or space (such as “4, 7, 15-34”).
- ▶ Choose Save as PDF as the printer option.

One-Pager Topics

- ▶ Registered Apprenticeship Funding Opportunities for Employers
- ▶ Preparing for an Equitable, Inclusive & Accessible Apprenticeship Environment
- ▶ Recommendations for Quality Related Technical Instruction
- ▶ Effective Mentoring Practices
- ▶ Data and Registered Apprenticeship
- ▶ Apprentice Retention Strategies
- ▶ Three Apprentice Hardship Signs & Troubleshooting Tips
- ▶ How to Address Discrimination Complaints from Apprentices

We recommend grantees select the one-pagers that best align to each employer’s individual needs. For a new RA employer, perhaps provide them with a folder that has all the one-pagers and a thank you letter. An employer who has been hiring apprentices for a while might have a specific area where they could use support, such as apprentice retention. This guide is intended to be flexible. Should grantees have recommendations for additional one-pagers, please let the ABA technical assistance team by emailing ABAGrant@icf.com.

Registered Apprenticeship Funding Opportunities for Employers



There are a variety of funding opportunities for employers who have committed to Registered Apprenticeship (RA) Programs. This can include incentives, direct funding, and/or reimbursement to offset some of the costs of apprentice wages, related training instruction (RTI), and support services apprentices might need to successfully complete their apprenticeships. This document provides an overview of federal, state, and other programs available to RA employers.

Federal

U.S. Department of Labor

Registered Apprenticeship Intermediaries: The Office of Apprenticeship's industry intermediaries offer expertise to help employers launch, promote, and expand RA Programs in growing industries. Many of these partners have direct funding and/or employer incentives available. Employers should contact the intermediaries that align with their sector to find out more. See this [Fact Sheet](#) for a list of organizations and contact information.

Workforce Innovation and Opportunity Act (WIOA):

Employers may receive direct reimbursement for specific RA Program related expenses, or the apprentice may receive reimbursement or access to services an employer otherwise might incur expenses.

Reimbursement for an Apprentice's Wage

- Employers may receive reimbursement of up to 50% of an apprentice's wage. This reimbursement will be for a designated period, usually not more than six months. This covers wages for one or multiple apprentices. There may be additional funding available for the supervision and extraordinary training costs associated with overseeing new apprentices. A small amount of funding is available for employers that hire their incumbent workers as apprentices.

Payment for Apprentice's Related Technical Instruction & Supportive Services

- Eligible apprentices can establish an Individual Training Account for costs related to classroom instruction and distance learning for RTI. Support services, such as transportation, books, supplies, and childcare are also covered.
- Required Partner: A Local [American Job Center](#), Key Contact—Employer Services Representative

Workforce Opportunity Tax Credit (WOTC): This federal tax credit is available to employers who invest in American job seekers who have consistently faced barriers to employment. Employers may meet their business needs and claim a tax credit if they hire an individual who is in a WOTC [targeted group](#).

- Required Partner: State Workforce Agency or a participating agency, such as a federal, state, county, or local government agency or a grantee of these agencies

Federal Bonding Program: The Federal Bonding Program allows employers to receive up to \$5,000 fidelity bonds free of charge as an incentive to hire hard-to-place job applicants. This program has a 99% success rate nationwide, as only one percent of over 50,000 workers receiving bonds proved to be dishonest.

Veterans Administration

GI Bill: Employers can receive incentive funding for hiring apprentices that are veterans. This requires establishing the apprenticeship as a Veterans Administration (VA) Certified Apprenticeship. Veteran apprentices can also use the GI Bill towards RTI tuition/fees when an employer becomes an 'Approved for GI Bill' RA Program sponsor. After an apprenticeship is registered, GI Bill authorization comes from each Department of Veterans Affairs state approving agency.

- Required Partner: [National Association of State Approving Agencies](#), Key Contact—[State Contact](#)

Special Employer Incentive (SEI) Program: Employers hiring veterans approved for the Veteran Administration's Vocational Rehabilitation and Employment (VR&E) services may receive a reimbursement of up to 50% of the veteran's salary for six months. This helps to offset costs associated with a loss of production, training instruction, and training materials.

- Required Partner: [VA Regional Office](#), Key Contact—VR&E Representative

WIOA has a priority service for veterans and their spouses for quality services for veterans as detailed in the [WIOA Final Rule Fact Sheet for Veterans and Spouses](#). See the WIOA section above for details.

There are additional state and local programs, including economic development incentives for veteran-owned businesses that hire veterans and funding available for direct support of veterans while in a RA Program.

State

In many states, employers may be eligible for job training, economic development, workforce, or specifically [RA Program tax credits and/or tuition support for apprentices](#). This varies, so employers should do a search or ask one of their partnering federal agency offices listed above for more information.

Other

There are national and local foundations with a workforce development focus, which may include RA Programs. While many of them provide funding through grants, there may be opportunities for employers to sign on as partners and/or subrecipients.

Community-based organizations are rooted in local neighborhoods or communities that have a special mission to serve disadvantaged residents of those communities. They include community, nonprofit, and faith-based organizations. They can provide a wide range of supportive services for apprentices, including transportation, childcare, counseling, case management, and others to an employer's apprentices.

Preparing for an Equitable, Inclusive & Accessible Apprenticeship Environment



A commitment to diversity, equity, inclusion, and accessibility (DEIA) is essential to ensure that quality jobs and career pathways available through Registered Apprenticeship (RA) Programs are open to all workers. Helping underrepresented populations and underserved communities participate and succeed as apprentices also helps employers increase their talent pool and build a workforce with a broader range of perspectives and experiences that can enhance products, productivity, and profit.

Equal Employment Opportunity

The Equal Employment Opportunity (EEO) regulations for RA Programs protect apprentices from various forms of discrimination based on specific characteristics. The Office of Apprenticeship (OA) has created [learning modules](#) on this topic as part of their RA Academy. Employers that are part of a group sponsorship or are utilizing an intermediary as the sponsor need to be aware of these requirements as sponsors with more than five apprentices have EEO obligations once the apprenticeship is registered.

Diversity, Equity, Inclusion & Accessibility

For the Apprenticeship Building America (ABA) grant, Jobs for the Future (JFF) is serving as the *Diversity, Equity, Inclusion and Accessibility (DEIA) Center of Excellence*. JFF has developed a RA DEIA [framework](#). Based on researched practices, it provides employers with guidance on implementing an organizational structure to help employers move beyond simply enrolling diverse participants into programs.

OA published a [Scaling Diversity, Equity, Inclusion & Accessibility \(DEIA\) in Registered Apprenticeship](#) with recommendations for employers who are instituting RA Programs at their companies.

- ▶ **Inclusive Leaders** set the standards for workplace culture, promote awareness, interrupt unfairness, and lead a working atmosphere of infinite learning for personal and professional growth.
- ▶ **Inclusive Decision Making**, where input from team members is encouraged and valued, can be especially important for new or under-represented members of the team.
- ▶ **Creating a Culture of Recognition** that publicly and privately acknowledges minority contributions to the organization.

- ▶ **Mentorship** to advance skills and build networks, which can help the underserved develop a positive connection to their workplace.
- ▶ **Prohibitive Voice Against Bias** to call out DEIA issues and increase better engagement.

Creating a welcoming, accessible environment for apprentices is an important focus for the ABA grant. See some tips below to prepare:

- ▶ **Explore resources** like the [Employer Assistance and Resource Network on Disability Inclusion \(EARN\)](#) website that provides guidance and background on the what, why, and how of making your company more welcoming and accessible to applicants and employees with disabilities.
- ▶ **Did you know about half of disability accommodations incurred no cost at all?** Accommodations with a cost incurred mostly one-time costs and the median cost was \$500 as indicated in one survey by the [Job Accommodation Network](#).
- ▶ **Create a safe environment** for apprentices to disclose their disability.
 - ▶ **Do not assume — ask questions!** People with disabilities know their abilities and the accommodations they need. Politely asking how you can provide support is the best way to go about it.
 - ▶ **Trust your disabled apprentices.** When discussing or negotiating workplace accommodations, have a 'good faith' mindset and make it a collaborative process.
 - ▶ **Maintain confidentiality** of information about an apprentice's disability and their medical records, if applicable.
- ▶ **Expand your knowledge** using tools from entities like the Partnership on Inclusive Apprenticeship which has a [guide on disclosing disability](#).

Once you have prepared the environment with a DEIA focus, it is time to think about how to bring diverse apprentices on board!

Partnerships are essential to recruiting apprentices from underrepresented populations and underserved communities. These partners, such as community-based organizations, have a deep understanding of the populations they serve and can provide guidance on how to best reach their recipients. The Department of Labor's [Universal Outreach Tool](#) can help you identify local partners.

Recommendations for Quality Related Technical Instruction



Classroom training, also called related technical instruction (RTI), is one of the key elements of a Registered Apprenticeship (RA) Program. The instruction is designed to meet employer needs and can be offered by employers, community colleges, labor unions, online education providers, high schools and more. Apprentices gain core knowledge and develop skills needed to help make on the job training (OJT) meaningful.

Below are recommendations to ensure RTI is of the highest quality and meets apprentice needs. When the employer is providing the RTI, they will have direct influence in adhering to these practices. If the RTI is being provided by another organization, it is recommended employers negotiate as many of these as possible with the RTI provider to ensure apprentices have the highest chances of success.

Align the RTI schedule to the workday. Many apprentices are juggling multiple responsibilities. Allowing them to participate in RTI during apprenticeship work hours has a tremendous impact on apprentice retention. For example, one Apprenticeship Building America (ABA) grantee, a state community college system, shared that when apprentices are required to attend RTI classes in the evenings and weekends, employers experienced a high turnover rate. However, when they can attend as part of their workday (or closely aligned to those hours), apprentice retention is high.

Ensure appropriate pacing. Pacing needs to be a central consideration for RTI. It is important for instructors to teach at a pace that provides apprentices a chance to absorb the material. Think of this as the Goldilocks Zone—not too fast, not too slow. In general, most instructors have the tendency to go too fast as they feel pressure to cover all the material. However, if apprentices feel rushed or do not understand the material, they may end up feeling frustrated or lost. This can have a negative impact on apprenticeship retention. It is important to create an open learning environment where apprentices can provide feedback on program pacing and ask questions if they do not understand a concept.

Integrate real-world examples. Help apprentices start making connections between RTI and actual work processes by integrating real-world examples throughout the coursework. For example, the instructor can state “on the job, you need to know this to...” or “this will help you to...” Real-world examples are helpful to apprentices to make the knowledge transfer to OJT. Provide these examples (if RTI is provided by the employer) or write them up for the RTI provider.

Use a variety of teaching approaches. Apprentices will have different learning styles and come from a range of educational backgrounds. Consider this and round out formal presentations with group discussions, videos, labs, hands-on activities, and projects. In addition, integrate soft skills into RTI. Share how soft skills, such as teamwork and communication, are used on the job and provide the apprentices opportunities to apply these skills in learning activities.

Provide support and intervention. For community college or other formal education partners, support and intervention are part of their RTI offerings. This includes financial aid, advising, and counseling. If RTI is offered through another entity, be sure to set up these supports either through your organization or another partner to help flag any issues apprentices may have with keeping up with classes. For employers providing the RTI, ask experienced employees to volunteer as tutors. Community-based organizations may offer these services.

Institute a continuous improvement process. Apprentices can offer some of the most relevant feedback on how RTI is aligned to OJT and learning. Invite apprentices to complete course evaluations and/or ask for their feedback directly. In addition, ask their mentors to share feedback on how apprentices are applying what they are learning in the workplace. Use this feedback to update and improve curricula/courses.

Effective Mentoring Practices



Mentoring has many facets in many contexts, but a common thread is relationships. Even in the structured mentorship of Registered Apprenticeship (RA), the mentor and apprentice will establish a reciprocal bond that goes beyond “tutor-pupil.” A mentor models the skills and behaviors in the expectation that the apprentice will learn and emulate these skills and behaviors. Mentoring is a two-way street, which necessitates a level of trust between mentor and apprentice.

Selecting Mentors

Good employees do not always make effective mentors. The following are tips for selecting mentors.

- ▶ Choose mentors who are fully committed to the concept and value mentoring apprentices; mentors who have been an apprentice themselves can bring a valuable perspective to the mentorship and needs of the apprentice.
- ▶ Mentors are role models, not just of the occupation, but of the company culture; if a mentor has not bought into the company culture, neither will the apprentice.
- ▶ Mentors must be good, active listeners; apprentices should feel comfortable communicating difficulties and questions to the mentor without fear of judgment.
- ▶ Mentors are patient, respectful, and have a good sense of humor – apprentices make mistakes; it is not the end of the world.

Understanding and applying diversity, equity, inclusion, and accessibility (DEIA) is also essential in the mentoring relationship. Mentors may come from different backgrounds than their mentees, so this is essential for the mentor/mentee relationship to thrive and to retain apprentices. This is why it is recommended mentors take advantage of Jobs for the Future course on this topic (eight 20-minute modules, free, registration required):

[Diversity, Equity, Inclusion, and Accessibility in Mentorship for Registered Apprenticeship](#)

How to Mentor

The mentor's primary role in an apprenticeship is to convey job skills to the apprentice such that the apprentice will become independently capable of doing the work. However, before that begins, once paired as mentor-mentee, the process of forming a relationship begins. Literature suggests that they spend time at the beginning of the process getting to know each other, sharing goals, aspirations, experience, and beginning to build trust. The mentee needs to feel

comfortable bringing work and non-work concerns to the mentor. The mentor is not a psychologist or social worker but knows from experience that problems away from work often impact job performance and needs to convey that understanding to the apprentice. The mentor should have access to resources to which the apprentice can be referred to deal with such problems – the mentor needs to know when to help and when and how to get help.

Apprenticeship mentoring is a structured process. 80% of the apprentice's training – and most of their learning – will be accomplished on the job. The mentor needs to be well acquainted with the apprentice's training goals and requirements as laid out in the apprenticeship standards so the mentor can guide the apprentice through the progression of skills necessary for successful completion of the apprenticeship. A good mentor will know the theory the apprentice is learning in the related technical instruction (RTI) and help the apprentice apply it in practice on the job.

Keep good records. Diligence in assessments is an invaluable tool in tracking the apprentice's progress. This will ensure the apprentice is being measured consistently and rewarded fairly for their progress through the apprenticeship.

Tips for Teaching Tasks

- ▶ Start by describing the context of the task, then follow with specific examples and instructions.
- ▶ Don't flood the apprentice with information. Apprentices can only absorb so much at a time; emphasize what is important and be open to questions.
- ▶ Communicate; ensure that what you are saying is what the apprentice is hearing and understanding – communication is a two-way street.
- ▶ Ask open-ended questions (questions that elicit more than a yes or no response).
- ▶ When tasks are especially complex, break them down into key steps and summarize each point.
- ▶ Ask the apprentice to describe the task before tackling it, especially if safety is an issue.
- ▶ Be constructive, and engage the apprentice with questions that spur self-evaluation, e.g., “Why did you do this step in this particular way?”
- ▶ Have the apprentice repeat the task, even if it was done correctly. Repetition breeds learning.
- ▶ With few exceptions, most tasks have multiple paths to successful (and safe) execution; be open to learning yourself from the path the apprentice takes.

- ▶ Observe the apprentice performing the task, intervening only if asked or if there is a safety issue.
- ▶ Again, remember that apprentices will not always get it right; mistakes are part of learning. Have a sense of humor.

Tips for Supporting the Whole Person

- ▶ Be purposeful about your engagement with your apprentice; plan and organize.
- ▶ Listen, ask questions, and encourage.
- ▶ Get to know who your apprentice is beyond their workplace persona.
- ▶ Be interested in what matters to them.
- ▶ Build your apprentice's confidence and self-esteem.
- ▶ Confidentiality and trust are important; keep confidential information private.
- ▶ Be diligent about evaluation and follow-up.

Data and Registered Apprenticeship



As an employer connected to an Apprenticeship Building America (ABA) grantee, there are data elements that must be reported to the US Department of Labor's Employment & Training Administration (ETA) as part of your grantee's grant agreement called "performance reporting." Grantees submit data quarterly in narrative and quantitative (numerical) forms related to performance targets and measurements.

At a minimum, all grantees report on the number of stakeholders engaged, new and expanded pre-apprenticeship and Registered Apprenticeship (RA) Programs, and pre-apprentices and apprentices enrolled using grant funds. Other grantees must report specific details about pre-apprentices and apprentices, such as demographic information, types of support services they are receiving, enrollment dates, and completion dates. As the employer that hires the apprentices, your ABA partner will be asking for this type of information. If you need assistance with what data to collect or how to collect it, reach out to your grantee.

For RA Programs to be successful and sustainable, employers need to understand how they are benefiting their organization and where there might be room for improvements. Keep the communications channel open with your ABA partner about the data that is most important to you. Much of this data will be included in the performance reporting data, however, there may be additional data you both decide to collect. This might be gained through surveys, focus groups or interviews, or other means.

Three Data Questions for Employers to Consider

1. For the ABA grant, what data will be most valuable to your organization?
2. Why are those important to you?
3. If we were able to collect that data with accuracy and efficiency, how would you use that data?

These are foundation questions for employers who want to understand how RA is impacting their company.

For the ABA grant, what data will be most valuable to your organization? This might include:

- ▶ Demographics and background of our apprentices
- ▶ Apprentice completion rates
- ▶ Alignment of related technical instruction to on-the-job training

Why are those important to you? This might include impact around:

- ▶ Addressing our talent shortage
- ▶ The diversity of our workforce
- ▶ Our company's bottom line

If we were able to collect that data with accuracy and efficiency, how would you use that data? Especially for employers that are new to RA, this might include:

- ▶ **Improve specific elements of our RA Program.** Not giving up on the RA model but seeking to understand aspects that may need to be adjusted is ideal. Using data to make continuous improvements can ensure the RA model has time to mature and meet its potential.
- ▶ **Identify apprentice barriers that impede completion.** When brought to the surface, most apprentice barriers can be remedied by the employer or a partner, such as a community-based organization. This type of data can be collected through a short survey or interviewing mentors. See the "Apprentice Retention Strategies" and "Three Apprentice Hardship Signs and Troubleshooting Tips" one-pagers for recommended strategies and promising practices for remedying the most common apprentice challenges.
- ▶ **Expand RA Programs.** Given RA offers access to hundreds of in-demand occupations, there is tremendous opportunity to grow RA Programs at your company. Employers are utilizing RA for common cross-cutting occupations such as IT support technician, project manager, marketing manager, maintenance and repair, and customer service.
- ▶ **Reconsider RA Programs.** While the RA model has a wide array of applicability for employers, there is the possibility it may end up not being the right fit. If that is the case, consider other work-based learning models or workforce development tactics that are successful in recruiting and retaining a diverse workforce.

Apprentice Retention Strategies



Apprentice retention is key to the success of any Registered Apprenticeship (RA). The strategies in this document are ones that employers can put in place in advance to mitigate the common reasons apprentices do not complete. We have included many of the barriers discussed in the American Institute of Research report [Improving Apprenticeship Completion Rates](#) and offer promising practices discussed in the report and those being instituted by Apprenticeship Building America (ABA) grantees.

Common Apprentice Barrier	Recommended Employer Strategy	Promising Practices
Financial instability	Minimize direct costs to apprentices	- Start base wage at a rate that can support living expenses in the region. - Provide uniform and other clothing required on the job. - Connect with your local American Job Center and community-based organizations (CBOs)—funding may be available to qualified apprentices for transportation, childcare, tuition, fees and more. - Offer financial management workshops or create a list of online resources on the topic.
Personal and/or life challenges	Make resources available to apprentices to address their challenges Consider trauma informed approaches to the workplace*	- Partnerships with CBOs are key as they may offer case management, counseling, and other supportive services. - Train mentors on building trusting relationships with their mentees. See the <i>Effective Mentoring</i> document in this guide. - Create opportunities for apprentices to connect with their peers and team members to build a social support system and sense of belonging.
Unrealistic expectations of the job/apprenticeship	Provide detailed information on the nature of the job/apprenticeship	- Have employees/apprentices (vs. someone from HR) participate in panels with partners that are offering information sessions. - Develop detailed descriptions of the job/apprenticeship, progression, wages, and any special requirements (ex. travel or being on-call). - Have potential apprentices participate in a job shadowing day, several days, or week.
Dissatisfaction with the level of skills being gained	Invest in intentional workforce planning processes to ensure apprentices can have meaningful skill gains	Develop a learning environment where apprentices are supported in learning new, higher-level skills with practice and support versus an overabundance of low-skill tasks.
Bias, discrimination, and/or a hostile work environment	Set up clear processes for apprentices to report bias, discrimination, and/or a hostile work environment without fear of retribution	- Consider adopting Jobs for the Future's Language Matters Guide. - Invest in diversity, equity, inclusion, and implicit bias training for all staff. - Designate a mediator to address issues of bias, discrimination, or harassment. Ensure apprentices know who and how to report these issues. - See Addressing Harassment in Apprenticeship: A Fact Sheet for Those Who Manage, Train, and Mentor Apprentices from the US Department of Labor.

*Resources for Trauma-informed Workplaces

Harvard Business Review: [We Need Trauma-Informed Workplaces](#)

National Fund for Workforce Solutions: [A Trauma-Informed Approach to Workforce: An Introductory Guide for Employers and Workforce Development Organizations](#)

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Three Apprentice Hardship Signs and Troubleshooting Tips



Included in this Employer Toolkit is a set of Apprentice Retention Strategies. These build on the top reasons apprentices drop out of Registered Apprenticeship (RA) Programs. If as the employer you have addressed most or all these recommendations, this will go a long way to preventing apprentices from dropping out.

However, apprentices may experience life circumstances beyond an employer's control that can impact their ability to complete an apprenticeship, which is the impetus for creating this tip sheet. Given the extensive time and resources put into every single apprentice, we have compiled a set of three trouble signs an apprentice may be experiencing some type of barrier and a troubleshooting tip for how this might be handled to maximize the chance of keeping that apprentice on board. Both the trouble signs and troubleshooting tips are based on input from Apprenticeship Building America (ABA) grantees and coaches.

#1: Cell Phone Number Not Working/Out of Service

If an apprentice's cell phone goes to voicemail for several days or there is a not in service message, it may be a sign of financial struggles.

Troubleshooting Tip: When an apprentice is hired, ask for an emergency contact and phone number. Try this individual first. Sometimes the employer still might not be able to reach the apprentice. To remedy this immediately, set up an emergency fund for apprentices that can be used for instances like this or other situations that need immediate attention, like a car repair or to pay a power bill. This would be a relief to both the apprentice and employer. Then, connect the apprentice with financial resources, such as a financial management course, community partners, a local utility foundation (if they may be having trouble paying their electric/heating bill), and/or a food pantry (the apprentice may also be experiencing food insecurity).

#2: Frequent Absences

While frequent absences may be the sign of illness, they can also be a sign an apprentice is having a personal challenge, such as lack of transportation, childcare, caring for a family member, or a mental health issue, such as depression.

Troubleshooting Tip: As discussed in the *Effective Mentoring Practices* document, the relationship between mentor and mentee is incredibly important. Building rapport where the apprentice can bring nonwork related concerns is essential. The mentor can make a referral to either an internal resource or to a community organization if the apprentice is struggling with childcare, mental health issues, trauma, or other reasons.

#3: Behavioral Change

Change in an apprentice's behavior, such as withdrawal or aggressiveness, can signal many issues. The apprentice may be a victim of harassment or micro-aggression. It could be the individual is having mental health issues, or, perhaps, there is something is happening in their home environment.

Troubleshooting Tip: As with frequent absence, the first person to approach the apprentice should be the mentor from a place of care and concern. Then, a human resources intervention may be required if there is a problem in the work environment, the individual might want to access an Employee Assistance Program or provide a list of community partners if the apprentice may need counseling or case management.

How to Address Discrimination Complaints from Apprentices



Critical to the success of your business is a diverse workforce team. There may be discrimination complaints that arise, and it is best to address them effectively. It sends a message to all employees that the organization values diversity, equity, inclusion, and accessibility and takes complaints seriously. Addressing Registered Apprenticeship (RA) Equal Employment Opportunity (EEO) requirements is a great start to managing discrimination.

Title 29 C.F.R. 30.3 Equal Employment Opportunity in Apprenticeship provides clarity relating to every sponsor's general duty to ensure that apprenticeship programs are operated [free from harassment, intimidation, and retaliation](#). Some employers serve as sponsors and others participate in RA Programs under the umbrella of another employer or intermediary serving as the sponsor. While, ultimately, it is the sponsor who has the obligation to undertake steps to address any violation EEO, all employers, regardless of their sponsorship role, need to have processes in place to address any issues that arise among apprentices.

The contents of this document are from the [Office of Apprenticeship](#) and are reprinted here to provide employers with a succinct overview of how discrimination complaints should be handled. Employers can also refer to the [U.S. Department of Labor's Addressing Harassment in Apprenticeship: A Fact Sheet for Those Who Manage, Train, and Mentor Apprentices](#).

Apprentices and applicants to Registered Apprenticeship Programs may file a discrimination complaint if they believe they have been discriminated against on the basis of race, color, religion, national origin, sex (including pregnancy, sexual orientation, and gender identity), sexual orientation, age (40 or older), genetic information, or disability with regard to apprenticeship, or if they believe they have been retaliated against. The complaint must be filed within 300 days of the alleged discrimination or the alleged failure to follow the EEO standards. Sponsors must notify apprentices and applicants of their right to file a discrimination complaint and the procedures for doing so, using the [complaints notice information](#) contained in the apprenticeship EEO regulations.

Below are the actions required of sponsor and employers:

- ▶ Publish the [EEO Pledge](#) in apprenticeship program standards and in appropriate publications, such as apprentice and employee handbooks, policy manuals, newsletters, and electronic media.
 - ▶ Sponsors registered with the U.S. Department of Labor, Office of Apprenticeship may add the EEO Pledge Update Addendum in Circular 2017-02 to their existing standards.
 - ▶ Sponsors registered with a State Apprenticeship Agency should contact that agency for guidance.
 - ▶ You can find out if your program is registered with the federal government or a state government agency by looking at the State Apprenticeship Agency map.
- ▶ Post the [EEO Pledge](#) in conspicuous places in the workplace.
- ▶ Include the [EEO Pledge](#) in apprenticeship opportunity announcements.
- ▶ Notify apprentices and applicants for apprenticeship of their right to file a discrimination complaint and the procedures for doing so using the complaints notice information.
 - ▶ Provide the notice in the application for apprenticeship.
 - ▶ Display the notice in a prominent, publicly available location where all apprentices will see it.
- ▶ Conduct orientation and periodic information sessions for all individuals connected with the administration or operation of the program (including apprentices and mentors/journeyworkers who work with apprentices) to inform and remind them of the sponsor's apprenticeship EEO policy.
- ▶ Maintain records to demonstrate adherence to these requirements and make these records available to the registration agency upon request.

[Learn how to get your own EEO Pledge poster.](#)