



Annual EEO Self-Assessment

Toolkit for Apprenticeship
Program Sponsors



What Equal Employment Opportunity Means in Apprenticeship

Equal Employment Opportunity (EEO) in Registered Apprenticeship Programs (RAPs) guarantees that all individuals have fair and equal access to apprenticeship opportunities. This applies regardless of a person's race, color, religion, national origin, sex (including pregnancy, sexual orientation, and gender identity), age (40 years or older), genetic information, or disability.

Under 29 CFR Part 30, all apprenticeship program sponsors are required to:

- Ensure nondiscrimination by providing equal access to all applicants and apprentices.
- Assign responsibility for EEO compliance to a designated coordinator.
- Communicate EEO policies and pledge clearly to staff and apprentices.
- Implement universal outreach and recruitment to reach all groups.
- Maintain a harassment-, intimidation-, and retaliation-free program environment.
- Keep detailed records of outreach, selection, training, and complaints.
- Develop and implement a written Affirmative Action Plan if required.

Understanding EEO's role is crucial in recognizing why sponsors must evaluate their efforts annually. This review is far more than a procedural step—it is a mandatory compliance requirement under 29 CFR Part 30.



Why The Annual EEO Self-Assessment Matters

An annual EEO self-assessment ensures that apprenticeship programs remain aligned with federal regulations, helping sponsors detect and correct any areas of non-compliance. By conducting this review, sponsors strengthen the legal integrity of their programs and build confidence in their processes and documentation.

A well-executed self-assessment supports sponsors in:

- 01** Documenting compliance efforts, including affirmative action activities, EEO policy implementation, and complaint resolution processes.
- 02** Identifying gaps or inconsistencies in practices, which might otherwise expose the program to compliance risks or enforcement actions.

03 Ensuring continuous improvement, proactively addressing potential issues before they escalate.

04 Preparing for external audits or reviews by regulatory agencies, with complete and organized records.



Ultimately, the annual EEO self-assessment serves as a cornerstone for maintaining compliance and demonstrating accountability. It reinforces the sponsor’s commitment to upholding equal employment opportunities, ensuring a transparent and fair apprenticeship system.

Annual EEO Self-Assessment Tool

The self-assessment tool is designed to assist sponsors in performing a thorough review of six key compliance areas, along with a final Summary of Findings and Corrective Actions. This assessment should be completed annually by the EEO Coordinator and/or Compliance Officer, and the leaders of the apprenticeship program should review it. Sponsors are encouraged to utilize the Notes/Actions column for each section to document findings and corrective actions. This documentation should be retained for quality assurance program review and audit purposes.

SECTION 01

Program Documentation & Governance

01

This section ensures that your program has clear, written policies and designated roles that uphold EEO compliance. Use this section to verify that your EEO policies are current, your EEO Coordinator is properly designated, and all SOPs reflect EEO principles. Regular training should be scheduled and documented.

Compliance Element	Yes	No	In Progress	Notes / Actions
Program has an up-to-date EEO Policy & Pledge prominently displayed and included in materials.				
Program has designated an EEO Coordinator with clear responsibilities and authority.				
Program maintains written Standard Operating Procedures (SOPs), incorporating EEO requirements into processes (outreach, selection, complaints).				
Apprenticeship agreements are updated and include nondiscrimination clauses.				
Program conducts regular staff and stakeholder EEO training.				

SECTION 02

Outreach & Recruitment

Outreach and recruitment are crucial for reaching all populations. Verify that your recruitment list is up to date. Document outreach activities and ensure that postings are made with sufficient notice, and track engagement with community organizations and partners.

Compliance Element	Yes	No	In Progress	Notes / Actions
Program has an updated list of recruitment sources, including local organizations serving groups underrepresented in apprenticeships.				
Program provides a 30-day advance notice of openings to recruitment partners.				
Universal outreach efforts include general and targeted strategies to recruit all populations.				
Program documents outreach activities, postings, and partnerships.				

SECTION 03

Application & Selection Processes

This section focuses on fairness in selection. Ensure criteria are clear, job-related, and consistently applied. Include the EEO Pledge in all materials. Offer voluntary self-identification and track reasonable accommodations. Retain records for at least three years for compliance verification.

Compliance Element	Yes	No	In Progress	Notes / Actions
Application and selection process includes clear criteria applied consistently to all applicants.				
EEO Pledge and complaint procedures are included in application packets.				
Applicants are provided with the opportunity to voluntarily self-identify disabilities (pre-offer, post-offer, and annually).				
Reasonable accommodation requests are offered, documented, and responded to.				
Application and selection records are kept for at least 3 years (or more, depending on your state requirements).				

SECTION 04

Apprentice Demographics & Data Management

Track demographic data confidentially and conduct availability/utilization analysis for your AAP. This helps identify underrepresentation and target recruitment and retention efforts. Regularly review data trends and report securely to relevant agencies.

Compliance Element	Yes	No	In Progress	Notes / Actions
Program tracks apprentice demographics (race, ethnicity, gender, disability) confidentially.				
Program conducts availability and utilization analysis as part of the Affirmative Action Plan (if applicable).				
Program reviews data to identify gaps or disparities in participation and completion rates.				
Data is securely maintained and reported as required to the DOL or the State Agency.				

SECTION 05

Harassment, Retaliation, and Complaint Resolution

EEO compliance includes fostering a safe and respectful environment. Ensure anti-harassment policies are visible and enforced. Document training participation, complaint procedures, and resolutions. Maintain logs securely and provide clear avenues for complaints.

Compliance Element	Yes	No	In Progress	Notes / Actions
Program has an anti-harassment policy and conducts interactive training for all participants and staff.				
Complaint procedures are in place and accessible to apprentices and applicants.				
Program keeps a log of all complaints, investigations, and resolutions.				
Facilities and training environments are inclusive and free from harassment, intimidation, and retaliation.				

SECTION 06

Affirmative Action Plan Review (If applicable)

If your program has 5+ apprentices and has operated for 2+ years, maintain a robust AAP. Use this section to review your AAP's effectiveness, conduct analyses, and implement corrective actions where needed. Include any new outreach or retention strategies.

Compliance Element	Yes	No	In Progress	Notes / Actions
Program has an up-to-date AAP (required for programs with 5+ apprentices and in operation 2+ years)				
AAP includes availability and utilization analysis by race, sex, and disability				
Program conducts an annual self-assessment of AAP effectiveness.				
Program implements corrective actions where underrepresentation is identified.				

SECTION 07

Summary of Findings & Corrective Actions

Use this final section to summarize key findings from each section, plan actionable steps, assign responsible persons, and set target dates. This summary will guide your program's continuous improvement efforts and ensure accountability.

Compliance Element	Compliance Element	Compliance Element	Compliance Element
<i>(Describe the specific gap or issue identified during the assessment.)</i>	<i>(Detail the specific corrective or improvement actions to address the issue.)</i>	<i>(Assign a person or team responsible for completing the action.)</i>	<i>(Set a realistic deadline to complete the action.)</i>

Conducting the Self-Assessment

A successful EEO self-assessment hinges on careful planning, thorough review, and clear documentation. Here's how sponsors can approach the process effectively:

01

Plan and Schedule the Assessment

Set a specific date each year—ideally timed before the end of the fiscal or program year—to conduct the self-assessment. This ensures consistency and allows sufficient time to implement any corrective actions before external audits or compliance reviews. Consider integrating the assessment into your annual operational calendar to make it a routine part of program management.

02

Collect All Relevant Documents

Gather all documents and records necessary to complete the self-assessment. This includes, but is not limited to:

- Current EEO policies and pledge statements.
- Updated lists of recruitment sources and outreach activities.
- Records of training logs for staff, supervisors, and apprentices on EEO compliance.
- Complaint logs, including dates, descriptions, actions taken, and resolutions.
- Documented Standard Operating Procedures for EEO-related processes such as outreach, selection, and complaint handling.
- Updated apprenticeship agreements incorporating nondiscrimination clauses

Having these records organized and accessible ensures an efficient review and supports accurate assessment completion.

03

Review and Complete the Checklist

For each compliance area in the self-assessment tool, review the relevant documents and mark the compliance status as Yes, No, or In Progress. Use the Notes/Actions column to document observations, potential challenges, and necessary follow-up steps. Be specific—note which documents were reviewed, any discrepancies found, and the nature of incomplete compliance. This creates a transparent record of the assessment's findings.

04

Analyze Gaps and Challenges

Identify and prioritize areas where compliance is lacking or documentation is incomplete. These gaps might include missing outreach records, inadequate training documentation, or incomplete complaint logs. Analyze whether the gaps result from isolated incidents or systemic issues. For systemic issues, consider root causes, such as unclear procedures, insufficient staff training, or inadequate documentation practices.

05

Develop an Action Plan

Based on the assessment’s findings, create a detailed action plan that outlines:

- Specific steps to address each identified issue (e.g., updating SOPs, conducting refresher training, revising outreach strategies)
- Assigned responsibilities to ensure accountability for each action item
- Realistic timelines and deadlines to complete corrective actions before the next review cycle or audit
- Documentation of follow-up actions, ensuring a clear record of progress and resolutions

By following this structured approach, sponsors not only maintain compliance but also establish a culture of continuous improvement. A proactive and well-documented self-assessment strengthens the program’s integrity and prepares it for both internal reviews and external regulatory audits.

Final Reporting & Quality Assurance

After completing the self-assessment, sponsors must compile and retain comprehensive documentation that supports both internal quality assurance and audit readiness. This step is not simply an administrative task; it is a proactive measure that demonstrates the program’s integrity, readiness for review, and commitment to maintaining continuous compliance with Title 29 CFR Part 30.

Proper documentation serves multiple purposes:



It provides evidence of compliance during external audits conducted by the U.S. DOL Office of Apprenticeship (OA) or State Apprenticeship Agencies (SAA).



It allows the program to track its progress over time, ensuring that improvements identified during the assessment are implemented and sustained.



It reinforces the program’s ability to identify trends or recurring issues, which can inform future policy updates and training efforts.



Sponsors should establish a systematic process for organizing and storing records to ensure that information is readily available when needed. This includes maintaining both digital and physical files in a secure and confidential manner.

Key records to retain include:



Completed annual EEO self-assessment tool, with detailed notes on observations, identified gaps, action steps, and follow-up measures taken.



Updated EEO policies and procedures, including the most recent versions of the EEO Policy and Pledge, SOPs, and apprenticeship agreements that incorporate nondiscrimination clauses.



Outreach and recruitment records, documenting efforts to engage broader talent pools. This includes job postings, partnership agreements with community organizations, event participation, and communications with potential outreach partners.



Training records and materials, including schedules, attendance logs, session content, and materials used in EEO compliance and non-discrimination training for staff, supervisors, and apprentices.



Complaint records and resolutions, ensuring that all complaints are documented with dates, details, actions taken, and final resolutions, while maintaining strict confidentiality to protect the privacy of all parties involved.



Action plans addressing identified gaps, along with documentation of the corrective actions implemented, timelines for completion, and evidence of follow-up activities.



In addition to these records, sponsors are encouraged to establish a routine of regular internal reviews, even beyond the annual self-assessment. Periodic spot checks or mid-year reviews can help identify emerging issues early and demonstrate a continuous commitment to maintaining compliance and program integrity.

By using the findings from the self-assessment as a roadmap, sponsors can inform strategic planning, enhance processes, and ensure that their apprenticeship programs continue to meet the highest standards of fairness and compliance. This comprehensive approach not only satisfies regulatory requirements but also positions the program for long-term success and operational excellence.

Additional Resources

For more information and practical tools to support your program's compliance with Title 29 CFR Part 30, we recommend exploring the following resources:



Jobs For The Future

5 Equal Employment Opportunity Steps to Take When Setting Up a Registered Apprenticeship Program:

This tool documents the steps RA sponsors need to take under the Apprenticeship Equal Employment Opportunity regulations, 29 CFR Part 30.

5 Initial Steps to Equal Employment Opportunity for Registered Youth and Adult Apprenticeships:

This self-paced, online training course walks you through the first five actions RA programs must complete to meet EEO obligations.

Responses to Potential Sponsors' Concerns About Equal Employment Opportunity in Apprenticeship:

Organizations considering registering an RA program often have concerns about what EEO regulations mean for them. These talking points address many of their frequently asked questions.

Other Resources

- **Kansas State EEO Information Page:** Information and resources on the EEO requirements and implementation for program sponsors. **Colorado State EEO Information Page.**
- **Apprentice Outreach and Recruitment:** This webpage provides a list of helpful tools, links, and training webinars for universal outreach following EEO regulations.
- **Conducting Demographic Analysis for Registered Apprenticeship Programs:** A quick reference guide for apprenticeship sponsors to help understand workplace demographics.
- **RAPIDS Partner Finder Guide:** The Registered Apprenticeship Partners Information Database System, or RAPIDS, is a case management program that is the primary platform for managing apprentices, occupations, and relevant job openings.
- **US Department of Labor EEO Complaint Form:** Information and Complaint Form on how apprentices can submit formal complaints with the USDOL.
- **US Equal Employment Opportunity Commission Contact Info:** Information and resources on finding and contacting your local field office and employee rights on EEO complaints.

This workforce product was funded by a grant awarded by the U.S. Department of Labor (DOL)'s Employment and Training Administration (ETA). The product was created by the recipient and does not necessarily reflect the official position of DOL/ETA. DOL/ETA makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the institution that created it.