Checklist: Targeted Outreach, Recruitment, and Retention Strategies for Registered Apprenticeship Programs

AT A GLANCE

This tool provides an easy-to-use checklist of outreach, recruitment, and retention strategies that Registered Apprenticeship (RA) programs can take when the representation of an underrepresented population in their program falls below the goal they adopted for that population in their Affirmative Action Program (AAP). It covers the steps specifically required by the Office of Apprenticeship's Apprenticeship Equal Employment Opportunity regulations, 29 CFR part 30, as well as additional optional steps that can make outreach, retention, and recruitment efforts even more effective.

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About The Author

Donna Lenhoff is a lawyer and policy developer. She has nearly 40 years of experience implementing, teaching, writing about, and advocating for employment and civil rights law and policy in the U.S. Department of Labor and in nonprofit organizations representing employees' interests. Donna Lenhoff Associates provides best-in-class solutions to make it as easy as possible for organizations, especially Registered Apprenticeship programs, to foster equal employment opportunity, diversity, inclusiveness, and equity.

The content in this document is up to date in accordance with federal regulations as of January 2023. The latest regulations can be found on the U.S. Department of Labor’s Equal Employment Opportunity in Registered Apprenticeship website.
Introduction

The Office of Apprenticeship’s Apprenticeship Equal Employment Opportunity regulations, 29 CFR part 30 (29.30), require RA programs to undertake targeted outreach, recruitment, and retention steps when the representation of an underrepresented population in their program falls below the goal they adopted for that population in their Affirmative Action Program (AAP). (These steps are in addition to the universal outreach steps that every RA program must take.)

This tool provides an easy-to-use checklist of the outreach, recruitment, and retention strategies that the regulations require, as well as additional optional steps that can make outreach, retention, and recruitment efforts even more effective. It supplements OA’s existing resource on outreach and recruitment, “Outreach and Recruitment in Registered Apprenticeship Programs: A Quick Reference Guide for RAPs” (which focuses on universal outreach) and the excellent section on Outreach and Career Education for RAPs on the website of Chicago Women in Trades’ National Center for Women’s Equity in Apprenticeship and Employment. And it draws heavily from JFF’s Program Design Framework for Diversity, Equity, Inclusion, and Accessibility in Registered Apprenticeship (RA DEIA Design Framework). Thanks are also due to Natalie Linton and Jennifer Daley from the US Department of Labor and JFF’s Joshua Johnson for reviewing and commenting on drafts of this publication.
When Are Targeted Efforts Required?

RA programs that have five or more apprentices, have been registered for two or more years, and are not part of a federal contractor or other employer that has an approved Affirmative Action have to develop formal AAPs to codify and focus their efforts at providing equal employment opportunity (EEO). Part of such an AAP is the utilization analysis.

A utilization analysis examines the participation of apprentices from targeted populations in a RA’s program. The targeted populations are:

- Women
- Hispanic/Latinx individuals
- Black people / African Americans
- Asian Americans
- American Indians/Native Americans
- Native Hawaiians / Pacific Islanders
- Individuals With Disabilities
In general, in a utilization analysis, a RA program compares the proportion of the workforce in its recruitment area who meet the minimum qualifications for its program and who fall within each targeted population to the proportion of apprentices from that targeted population in its program. If the proportion in its programs is below 80% of the proportion who meet the minimum qualifications, the RA program sets a numeric goal for that population’s proportion equal to that 80% figure. The RA then must take specified targeted outreach, recruitment, and retention steps aimed at each population for which it has set a goal.

In the example in the text box, the Registered Apprenticeship program is underutilized for women and African Americans and therefore has to make targeted efforts to reach out to, recruit, and retain these two groups.
What Targeted Outreach, Recruitment, and Retention Efforts Are Required, and How Can I Accomplish Them?

JFF’s RA DEIA Design Framework recommends that programs “use transparent and accessible practices to diversify recruitment.” The four targeted outreach and recruitment steps required by the Apprenticeship EEO regulations are specific examples of such transparent and accessible practices:

- Disseminate information about your program to organizations serving each underutilized group

- Advertise all openings for your program in appropriate wide-circulation media in your recruitment area(s)

- Partner with pre-apprenticeship programs, local schools, vocational education systems, and community-based organizations to help prepare and recruit targeted populations

- Evaluate the effectiveness of your targeted outreach, recruitment, and retention activities after every selection cycle.

We address each of these steps in turn.

**Step 1: Disseminate information about your program to organizations serving the underutilized group, including the requirements for selection, the availability of opportunities, and your EEO Pledge**

You already notify all recruitment sources of openings in your program. Now, when you’re doing targeted outreach and recruitment, you need to do more outreach around upcoming openings and job announcements. Here are some ways you can do that:

- Send information even before you have openings

- Explain what your program is. The organizations you are reaching out to may not be familiar with apprenticeship programs
• Clearly convey entry and success requirements in your outreach and recruitment materials—not just the requirements for selection and the availability and frequency of opportunities but also the procedures for applying

• The Apprenticeship EEO regulations require you to give “preferably” 30 days’ advance notice of openings in your program. But it's wise to give more—enough so that your recruitment sources have time to help potential applicants prepare to take your admissions test

• Don’t just send out one mass email when you have openings. Send several

• Call the recruitment sources that are likely to refer diverse applicants and let them know when and how you’ll be accepting applications

• Use multiple media, such as email, text, snail mail, or social media, to give noticeAnnounce openings and the application process at union meetings

• Don’t just include your EEO Pledge in email, text, snail mail, or social media, go a step further: Indicate that people from the target group are specifically “encouraged to apply.” Here are examples of how to do this in an equitable way:
  
  o “Women as well as men are encouraged to apply”
  
  o “We welcome people from this community”
  
  o “Hispanics, people of color, and people of all genders are encouraged to apply”

• Very important: Make sure that the images and language in your announcements of the career-education events—indeed, in all your outreach and recruitment materials—reflect the population(s) you are targeting. (More detailed suggestions for how to do this can be found below.)
Step 2: Advertise all openings for your program in appropriate wide-circulation media in your recruitment areas

Previously, when you had program openings, you were not required to do more than send a notice of those openings to your recruitment sources. Now, when you’re doing targeted outreach and recruitment, you need affirmatively to advertise openings to the underutilized group(s) you’re targeting. Here are some ways you can do that:

- Always advertise in:
  1. Social media
  2. Job search engines
  3. Media that specifically serve the targeted population

- Think outside the box about where else you can place ads that the targeted population is likely to see:
  1. In buses and other forms of rapid transit that go to neighborhoods where they live
  2. In publications distributed to high school and community college students in your recruitment areas
  3. In neighborhood sales promotional mailings
  4. In venues frequented by your target group(s)
  5. On radio broadcasts of local professional athletic games
  6. At independent living centers and vocational rehabilitation programs
  7. On TikTok and other social media platforms

- Use the openings in your program as a “news hook” to seek coverage by local media (print, broadcast, and online)
Step 3: Partner with pre-apprenticeship programs, local schools, vocational education systems, and community-based organizations

Previously, when you had program openings, you were not required to do more than send a notice of openings to your recruitment sources. Now, when you’re doing targeted outreach and recruitment, you need to partner actively with community groups that can reach the underutilized group(s) you’re targeting. Here are some ways you can do that:

- Make effective use of your recruitment-source list.
  1. Look critically at the list of recruitment sources that you developed using OA’s Universal Outreach Tool. Is it missing anything? Is it short on sources that serve your targeted population? Supplement the list as necessary with local or regional community organizations that specialize in outreach to women, people of color, and individuals with disabilities, such as union hiring halls for occupations related to the ones you train for, faith-based organizations, local workforce boards, Minority Serving Institutions, historically Black colleges and universities, vocational rehabilitation programs, K-12 schools, and organizations serving people who are reentering their communities following incarceration.
  2. Develop relationships with the contact people at these sources and make sure they understand the opportunities you provide and have enough information to generate referrals to your program effectively. Meet with them in person for the strongest impact.

- Identify the organizations that have the capability to help prepare the targeted population to meet the requirements for entry into your program. Reach out to them to make sure they are preparing people to meet your requirements!
  1. These might be pre-apprenticeship programs, high schools, trade schools, community colleges, worker centers, Urban League chapters, YMCAs and YWCAs, American Job Centers, workforce development boards, local church groups/mosques/synagogues, unions, independent living centers, vocational rehabilitation programs, or Goodwill programs. Your local unemployment office should be able to help you identify such programs.
  2. If there is no program that meets your needs, consider providing funding to a local organization so that it can offer such a program.
• Some organizations only have the capability to let qualified individuals know about your program and recruit them to apply. In addition to the ones listed above, these might be:

1. Social-service agencies, NAACP chapters, Hispanic and Black Chambers of Commerce, AARP chapters, adult sports leagues, daycare centers, boys’ and girls’ clubs, neighborhood associations, and offices of legislative officials

• Participate in job fairs, especially in communities where your targeted population lives, and in other high-visibility community events like parades.

• Sponsor a local amateur sports team (and don’t forget the women’s teams).

**Step 4: Evaluate the effectiveness of your targeted outreach, recruitment, and retention activities after every selection cycle**

This is a common-sense step that you are required to take as part of your targeted outreach and recruitment. Here are some ways you can evaluate your effectiveness:

• Keep track of how your applicants found out about or were referred to your program.

• Keep track of the demographics of your applicants so that you can see which referral sources were the most effective at sending a diverse applicant pool.

• If a source is not referring a diverse pool of candidates, find a better one.

**What Additional Targeted Outreach, Recruitment, and Retention Efforts Are Effective?**

Here are some additional ideas of things you can undertake to target an underrepresented population for outreach, recruitment, and/or retention. (Although we have tried to categorize these as one of the three, they often overlap. For example, involving your apprentices and graduates of your program who are women, people of color, and individuals with disabilities in recruiting through their personal networks also has the positive effect of communicating to them that they are valued and helps to retain them; providing child care vouchers both retains apprentices and encourages potential applicants to apply because they can see that the program is interested in them and will support their successful employment.)
Best practices for Outreach to Target Groups

• Hold regular apprenticeship information sessions or career education workshops.

  1. Hold workshops at your facility, high schools, community colleges, community centers, and unemployment agencies

  2. Co-host such sessions with a tradeswomen’s organization, pre-apprenticeship program, workforce board, community organization, or city officials

  3. Host field trips to your facility, led by instructors and tradeswomen, to introduce prospective apprentices to your program

  4. Publicize your career-education events widely through ads in newspapers and magazines, local earned-media coverage, public-service announcements, flyers distributed on the street and posted in community venues, mass transit postings, social media, etc.

  5. Make sure that both your materials and your outreach events themselves are accessible to individuals with disabilities

    a. Follow accessibility requirements and guidelines to make your online documents readable with assistive technology

    b. Offer sign language interpretation and other accommodations for your events

Best practices for Recruitment of Target Groups

• Be sure your notices of openings appeal to your target group(s).

  1. Feature images of your target group(s) on your notices. “You can’t be it if you can’t see it!”

    a. Avoid using sex-referent language or non-inclusive language in your notices of openings or job announcements and other outreach and recruitment materials

    b. Provide your notices in the language that your target group speaks

  2. In the notices, address the concerns that potential apprentices from your target group are likely to have—for example, “transportation to the jobsite provided;” “previous experience in this field not required;” “college degree not required”
• Ensure that staff members who are responsible for recruitment reflect the diversity of the community and include members of your target group(s).

• Ask journey workers and apprentices from the target group(s) to recruit people in their networks.

• Ensure that your apprentices are prepared to succeed in your program by providing or funding pre-apprenticeship programs that serve underrepresented groups and follow OA’s Quality Framework for Pre-Apprenticeship Programs or JFF’s Framework for a High-Quality Pre-Apprenticeship Program.

• Develop direct entry admission mechanisms with these pre-apprenticeship programs.

• Offer other support to help participants meet any prerequisites for entry into your RA.

• In the application process, ensure all applicants can access assessments or pre-work required for program entry by providing accessible materials, offering different ways for participants to demonstrate knowledge, and providing testing accommodations.

• Remove questions about conviction records as part of the application process, except in cases where such screening is required by specific job eligibility criteria (“ban the box”).

**Best practices for Retaining Target Groups**

Programs can do a lot to increase their retention of apprentices from their target groups, and many of these actions are recommended as part of the design of the apprentice experience element in JFF’s RA DEIA Design Framework. In particular, the Framework suggests adopting the following elements as part of the design of the apprentice experience:

• Designing training and classroom instruction to be accessible and representative of participants

• Providing comprehensive and quality mentorship to participants

• Supporting participant success with robust and responsive retention services.

Many of the steps suggested in this section are among the specific tactics that the JFF RA DEIA Design Framework suggests taking to accomplish each of the above elements.
Maintain a Welcoming, Supportive Workplace Culture

Research shows that employees stay at their jobs when they feel they are valued and respected, when they feel they can contribute and be successful, and when they feel they \textit{belong}. Apprentices are no different. Much of what is needed to retain apprentices of a target group and to create such a work environment for members of the group involves steps like these:

- Adopt a workplace culture in which harassment, bullying, microinequities, and retaliation against your target group—against \textit{any} group!—are not tolerated.

1. Undertake a Respectful Workplaces Campaign designed to shift the culture of workplaces to be more inclusive to a diverse workforce. One example is \textit{“RISE Up”} (Respect, Inclusion, Safety and Equity in the Construction Trades)

2. Make prevention of harassment, discrimination, and retaliation for reporting those actions an element of your supervisors’ performance evaluations

3. Make clear to all your employees that if they engage in harassment, discrimination, and retaliation, they will be disciplined and even fired—and be sure to follow through

4. Address the isolation that members of the target group might feel if they are one of only a few workers from their group:
   a. Where possible, assign two or more apprentices from the target group to the same worksite
   b. Promote affinity groups for apprentices and journey workers from the target group(s)

- Ensure that apprentices from your target group(s) feel that their concerns are heard and their contributions are valued:

  1. Meet regularly with apprentices to discuss their needs and work with them to develop individualized plans and make connections to services and partners as needed
  2. Help apprentices grow their social capital by introducing them to employers, community partners, and other stakeholders to build their professional networks
• Enlist your journey workers who are from the target group(s) to help with your retention efforts:
  
  o Ask them to serve in leadership roles in your program
  
  o Ask them to mentor apprentices

**Design a mentorship program that enables all participants to thrive and succeed**

• A robust mentorship program is key to making apprentices feel valued and welcomed.

  1. Assign a mentor to every apprentice.
  
  2. Recruit and engage mentors with backgrounds representative of the community and the program’s participants
  
  3. Establish goals and a clear purpose for the mentorship program in partnership with mentors and apprentices
  
  4. Train mentors to help them support apprentices from the target group(s) to address challenges they may be having
  
  5. Support mentor training by engaging partners to deliver training, develop or offer resources, provide funding, or provide race and gender conscious mentoring online or in person
  
  6. Support accessibility by offering multiple ways for mentors and mentees to connect, such as in person, virtually, or in group settings
  
  7. Ensure that mentors have mechanisms to continue supporting apprentices after they have completed the program

**Ensure opportunity for advancement and leadership to members of the target group**

• Pay for apprentices to go to annual meetings of their union or attend conferences like Tradeswomen Build Nations

• Encourage members of the target group to participate in support, mentorship, and advocacy groups like the LA Black Workers’ Center’s Black Labor Construction Council or Lean In Circles for Union Tradeswomen, Sisters in the Brotherhood, Heartland Women in the Trades
Ensure equitable practices for classroom and on-the-job training

- Train your instructors and the journey workers who train apprentices on the job in equitable training practices, including how to deliver culturally relevant and accessible learning and training.

- Be sure that evaluations of the classroom work of apprentices from the target group are made without intentional or unconscious bias.

- Ensure that classroom and on-the-job instruction are accessible to all participants by offering materials in multiple languages and providing apprentices with a range of ways to demonstrate knowledge gains (universal design for learning).

- Integrate learning strategies that help participants understand how the skills they are developing relate to the work they will be doing on the job and provide opportunities for active learning, problem-based learning, and reflection (contextualized learning).

- Empower learners by supporting individual agency, providing opportunities for peer teaching, offering autonomous learning options, and recognizing the apprentices’ contributions to the organizational environment.

Ensure equitable practices in the day-to-day operation of your program

- Be sure apprentices from the target group work as many hours as other apprentices.

- Be sure apprentices from the target group get assignments in all the required work processes so that they can progress through the program at the same pace as other apprentices.

- When evaluating apprentices for promotion to the next level or for completion of the program, make sure apprentices from the target group are evaluated equitably.

- Regularly review all your apprentices' hours worked, assignments, and promotion and completion rates to make sure that the target group is treated without discrimination.
Remove financial barriers to ongoing participation by covering expenses or providing supportive services that apprentices from the target group might need

- Provide transportation or transportation subsidies.
- Subsidize costs of the related instruction, such as admission fees, books and other training materials, and computer access.
- Provide or pay for testing fees, uniforms, work boots, tools, personal protective equipment (PPE), and other equipment.
- Connect apprentices with services and support through partnerships and robust referral networks that can help provide resources such as housing, food access, transportation, and mental health services.

There are several sources of outside funding for supportive services that RA programs may be able to take advantage of, including these:

- State departments of transportation (DOT) can spend their federal funds for supportive services for highway workers, and a number of states have programs that allow RA programs to apply for such funding

- In Oregon, for example, the state DOT funds the Bureau of Labor and Industry to provide apprentices in heavy-highway occupations (carpenter, cement mason, ironworker, laborer, operating engineer, and painter) with financial assistance for child care expenses, fuel if required to travel more than 60 miles, lodging and meals if required to stay overnight, and expenses for tools and PPE

- JFF and other OA industry intermediaries can provide RA programs with financial assistance for supportive services as part of their incentive funding. (See JFF’s Registered Apprenticeship Roles and Responsibilities: Intermediaries and Sponsors)

- Public workforce funding, including Supplemental Nutrition Assistance Program (SNAP) Employment and Training and Workforce Investment Opportunity Act dollars, can expand services and supports for apprentices

- If apprentices are building or working at large (more than $150 million) commercial fabrication facilities funded by the federal CHIPS and Science Act of 2022, the project owner must fund or provide access to child care
If women are a target group . . .

- Provide lockable and sanitary restrooms and changing facilities that are reasonably close to their worksites.
- Make sure PPE fits properly.
- Provide or subsidize child care (men from some underrepresented communities might also need child care).
- Make your program family-friendly (men from some underrepresented communities who have child care or elder-care responsibilities might also find these helpful):
  - Allow flexibility in scheduling wherever possible
  - Provide paid family and medical leave

If individuals with disabilities are a target group . . .

- Make sure all worksites and facilities are accessible to all physical abilities by providing adaptive tools and equipment and proper accommodation to participants as needed (accessibility).
- Ensure that the intake and orientation processes (“onboarding”) are accessible to individuals with disabilities.
- Respond to requests for reasonable accommodations promptly.

Assess and Evaluate

- Conduct exit interviews of each apprentice who leaves your program without completing it successfully to understand better why they left and to help shape future practices.
- When you conduct your annual self-review of your program’s personnel practices to ensure that it “is operating an apprenticeship program free from discrimination based on race, color, religion, national origin, sex, sexual orientation, age (40 or older), genetic information, and disability” (29 CFR § 30.9(a)), pay special attention to the target group and assess your program for its impact on recruiting, enrolling, and retaining the target group.