

## Affirmative Action Plan Development Resource

The Minnesota Department of Labor and Industry (DLI) conducts program reviews to assess the overall condition of a sponsor's program and compliance with registered standards and the relevant regulations at 29 Code of Federal Regulations (CFR) [part 29](#) and [part 30](#), and Minnesota Statute [§178](#).

This document is intended to assist programs required to submit a written affirmative action plan (AAP) in their AAP development.

### What is an affirmative action plan?

An AAP is designed to ensure equal opportunity and prevent discrimination in RAPs. An AAP is more than passive nondiscrimination, it requires RAPs to take actively participate in encouraging and promoting equal opportunity and eliminate discrimination.

### Who is required to submit an affirmative action plan?

All programs with five or more apprentices must submit an AAP.

### What does an affirmative action plan consist of?

All AAPs must contain an equal opportunity pledge in addition to the below:

#### Utilization analysis for race, sex, and ethnicity

You can use the RAPIDS system to determine if their apprenticeship demographics are reflective of their recruitment area.

#### Establishment of utilization goals for race, sex, and ethnicity

RAPIDS can provide recommended goals, or RAPs may establish their own goals if they are higher than the goals provided by RAPIDS. Keep in mind, these goals are not quotas and cannot be used to discriminate against a qualified candidate based on a protected class.

#### Utilization goals for individuals with disabilities

All RAPs will use the utilization goal of 7% for individuals with disabilities, as required by [29 CFR 30.7](#). Again, these goals are not quotas and cannot be used to discriminate against a qualified candidate based on a protected class.

## Targeted outreach, recruitment, and retention

When there is an underutilization based on the utilization goals for one or more group (race, sex, ethnicity), the RAP must submit a plan to address the gap between utilization and their goal. As a sponsor, you're required to

- Actively share information about your apprenticeship program with organizations that serve underutilized groups. This includes explaining what your apprenticeship offers, the qualifications needed to apply, how and when opportunities are available, and emphasizing your commitment to equal opportunity. The goal is to ensure these communities are aware of and have access to your program.
- Actively advertise your apprenticeship openings in media outlets that reach underrepresented groups within your recruitment area. This means placing ads in newspapers, websites, radio stations, or community platforms that are widely read or accessed by the people you want to reach.
- Partner with local school boards and vocational education programs as a recruitment channel for underrepresented groups.
- Build relationships—called linkage agreements or partnerships—with organizations that can help you find and recruit qualified candidates for your apprenticeship program. These can include pre-apprenticeship programs, community-based groups, advocacy organizations, or other groups that work with underutilized communities. The goal is to tap into networks that are already supporting and preparing individuals who could be a great fit for your program.

The DLI has provided [recruitment outreach resource lists](#) as a resource for RAPs in creating their targeted plan.

## Review of personnel processes

As part of your affirmative action responsibilities, you are required to conduct a full review of your apprenticeship program every year—no matter how many apprentices you have or whether you're currently underutilized. This review is meant to ensure your program is free from discrimination based on race, color, religion, national origin, sex, sexual orientation, age (40+), genetic information, or disability.

This isn't just a quick check—it needs to be careful, thorough, and organized, covering every part of your program. That includes how you set qualifications, how people apply and are selected, pay rates, recruitment efforts, promotions, training rotations, performance reviews, discipline, accommodations, and whether your program is accessible—especially to people with disabilities, including your use of technology.

If you find any areas that may not meet these standards, you are expected to make changes to bring your program into compliance and ensure equal opportunity for all.

## Invitation to self-identify

You must provide all applicants with an opportunity to self-disclose a disability. The self-disclosure form should be provided at the time of application (either as part of the application or as a separate document), prior to starting the program, and at least once a calendar year.

## What documents to I need to start?

Prior to developing your AAP, you will want to have the following information at the ready:

- Current apprentice demographics for gender, race/ethnicity, veterans, and individuals with disabilities. This information can be found in your RAPIDS account.
- Details on when and how applicants and apprentices are asked to self-disclose a disability(ies)
- Current outreach and recruitment process/procedures
- Description of annual review of personnel and practices, and any recent modifications

## What if I still need assistance or have additional questions?

Reach out to Vicky Castorena at [Vicky.Castorena@state.mn.us](mailto:Vicky.Castorena@state.mn.us) to schedule a technical assistance meeting. Vicky can address questions via email, or you can schedule time with them to assist in developing your AAP.