

Meeting Minutes: Apprenticeship Advisory Board (Special Meeting)

Date: August 22, 2025
Prepared by: Nou Yang
Location: Online via Microsoft Teams

Attendance (Attendees are listed alphabetically order by last name)

Members Present

- Andy Campeau
- Tom Dicklich
- Erin Larsen
- Don Mullin
- Sarah Paul
- Melissa Stachovich
- Sophie Thaden

DLI Staff Present

- Annie Jenkins
- Byron Millea

Visitors Present

- Clara Albert
- Adam Hanson
- Stephanie Holland

Agenda items:

1. Call to order

- The meeting was called to order by Don Mullin at 1:30 p.m. Roll call was taken by Erin Larsen, and a quorum was declared.

2. Approval of agenda

- A motion was made, seconded, and carried to approve the Apprenticeship Advisory Board Special Meeting agenda for August 22, 2025.

3. Proposed Rules for 29 CFR 30 – Equal Employment Opportunity (EEO)

- Byron Millea, Attorney, Office of General Counsel reported the latest developments regarding 29 CFR 30, Equal Employment Opportunity (EEO).
- Current status of 29 CFR 30 Required EEO Statement
 - Required EEO statement
 - Affirmative Action Plans
 - Utilization Analysis based on demographics
 - Establishment of utilization goals
 - Targeted outreach/recruitment/retention
 - EEO Compliance reviews
 - Specific data collection (disability self-identification)
 - Complaint procedures
- US DOL's stated reasons for changes to 29 CFR Parts 29 and 30
 - Eliminating duplication of federal civil rights protection in other laws
 - Deregulation and reducing administrative burden
 - Shifting focus from Equal Opportunity to Merit-Based Opportunity
- Proposed Revisions to 29 CFR 30
 - Eliminates 11 sections of part 30 entirely
 - Rescinds requirements to create and implement affirmative action plan
 - Rescinds requirement for sponsors to perform underutilization analysis
 - Rescinds requirement for Apprenticeship Minnesota to regularly conduct EEO compliance reviews of sponsors
 - Requires Apprenticeship Minnesota to refer discrimination complaints to EEOC, DOJ, or state enforcement body (MN Dept of Human Rights or MN AGO)
 - Requires Apprenticeship Minnesota to submit a state plan for nondiscrimination in apprenticeship
 - Would require a legislative changes to Section 178.07
- Proposed Revisions to 29 CFR 29 – Labor Standards
 - Technical revisions to align with revisions to part 30

- Removing “sexual orientation” as a protected class required within apprenticeship agreement standards
- Removing requirements for requesting specific demographic information related to race, sex, ethnicity, and disability status and replacing with general requirement to request demographic data
- What does this mean for Sponsors?
 - All apprenticeship standards must be updated – SAAs have one year to comply after the final rule takes effect, and RAPS must comply within 180 days after that
 - Compliance reviews will be limited to Apprenticeship Program Reviews – extended reviewed addressing 29 CFR 30 will no longer be completed
 - Programs with 5 or more apprentices will no longer be required to complete an affirmative action plan
- Comment Period
 - Open until September 2, 2025

4. Apprenticeship Minnesota: Listening Sessions

- Apprenticeship MN hosted three listening sessions
 - August 7th, August 14th, and August 25th
 - 55 attendees across 18 programs to date (Signatory employers, community-based organizations, and related instruction providers also participated)
- Feedback from the listening sessions
 - There was confusion within the attendees on who was proposing the new rules
 - Many attendees stated they are hesitant to express concerns publicly
 - Programs expressed equity related concerns
 - Logistical questions related to updating standards, agreement language, and timelines
 - Some were worried about the implications for state and federal apprenticeship grants

5. Apprenticeship Minnesota Proposed Comments

- Apprenticeship Minnesota is working to clarify the listed topics with US DOL.
 - Understanding the USDOL enforcement process for non-compliance with proposed rules.
 - Clarification of whether Apprenticeship Minnesota can consider other characteristics, such as geography, low-income status, or veteran status.
 - Examples are requested to illustrate what non-conformance in policies and operational procedures might look like under the proposed rules.
 - Determining whether an increase in diversity could be interpreted by the USDOL as a presumption of non-compliance.
 - The interaction between state laws related to protected classes and the proposed federal rules needs to be clarified.
 - Guidance is needed on data collection requirements for apprenticeship agreements.
 - Clarity on program’s ability to implement preferred recruitment strategies within the framework of the proposed rules.
 - More information on the timeline for implementing the proposed rules is needed.

- Next Steps
 - Minnesota Department of Labor and Industry will submit comments to USDOL by September 2

6. Board Discussion-Approval of Report

- A motion was made, seconded, and approved.

7. Adjourn

- A motion was made, seconded, and meeting was adjourned. The next Apprenticeship Advisory Board meeting is scheduled for October 9, 2025.