

Equal Employment Opportunity Record Keeping for Registered Apprenticeship Programs



Office of Apprenticeship

A Quick Reference Guide for Apprenticeship Sponsors

All sponsors of Registered Apprenticeship Programs (RAP) are required to collect and maintain data and records necessary to determine if the sponsor is in compliance with its equal employment opportunity obligations.

What EEO Information Must be Collected and Maintained?

RAP sponsors must collect and maintain records on all aspects of compliance with the Apprenticeship Equal Employment Opportunity (EEO) regulations, including, but not limited to:

- **Apprentice selection**, including applications, tests and test results, interview notes, bases for selection or rejection, and any other records that disclose the impact that its tests and other selection procedures have upon employment opportunities of persons by identifiable race, sex, and ethnic group. Where there are large numbers of applicants, and procedures are administered frequently, such information may be retained on a sample basis, provided that the sample is appropriate in terms of the applicant population and adequate in size. (These records are described in greater detail in the Uniform Guidelines on Employee Selection Procedures.¹)
- **Operation of the apprenticeship program**, including (but not limited to) job assignments, promotion, demotion, transfer, layoff, termination, rates of pay, other forms of compensation, conditions of work, hours of work, and hours of training provided.
- All personnel records relevant to **EEO complaints** filed with the Registration Agency or other enforcement agencies.
- **Invitations to self-identify** as an individual with a disability.
- Requests for **reasonable accommodation**.
- **Compliance with equal opportunity standards** set forth in the EEO regulations (29 CFR part 30).
- Any other records required by the sponsor's Registration Agency.

Sponsors required to develop an Affirmative Action Program for their RAP must also retain their written Affirmative Action Plan and documentation of its component elements. Sponsors required to develop Affirmative Action Programs are those with five or more apprentices that do not already have an existing Affirmative Action Program under another federal law.

¹ The Uniform Guidelines on Employee Selection Procedures (UGESP), 41 CFR § 60-3.4(a), provide the framework for assessing whether employer selection practices comply with federal requirements prohibiting discrimination. You may view the guidelines and related information at the [Uniform Guidelines website](#).

How Long Must Sponsors Retain EEO Records?

Sponsors must maintain all EEO records for five years from the making of the record or from the personnel action involved (whichever occurs later). EEO records must be made available to the Registration Agency upon request.

For all these records, the sponsor must be able to identify the race, sex, ethnicity (Hispanic or Latino/non-Hispanic or Latino), and when known, disability status of each apprentice, and where possible, the race, sex, ethnicity, and disability status of each applicant to apprenticeship.

What Requirements Apply to Medical Information?

Any information obtained on the medical condition or history of an apprentice or applicant must be collected and maintained on separate forms and in separate medical files. The information must be treated as a confidential medical record and may not be used for any employment-related purposes except in limited circumstances identified in the regulations. Additionally, completed [Voluntary Disability Disclosure Forms](#) must be maintained in a file separate from apprentices' medical records.

Tools and Resources

If you need:

Use these resources:

 Additional information on record keeping	www.apprenticeship.gov/eo/sponsors/record-and-document
 Information on non-discriminatory apprentice selection procedures	www.apprenticeship.gov/eo/sponsors/recruit-and-hire
 Information on the invitation to apprentices and applicants to voluntarily self-identify as an individual with a disability	www.apprenticeship.gov/eo/protected-characteristics/disability
 Information on Affirmative Action Programs	www.apprenticeship.gov/eo/sponsors/create-your-plan
 Information on reasonable accommodations	askjan.org/publications/employers/employers-guide.cfm

Looking for more tools and resources on the EEO regulations? Visit www.apprenticeship.gov/eo