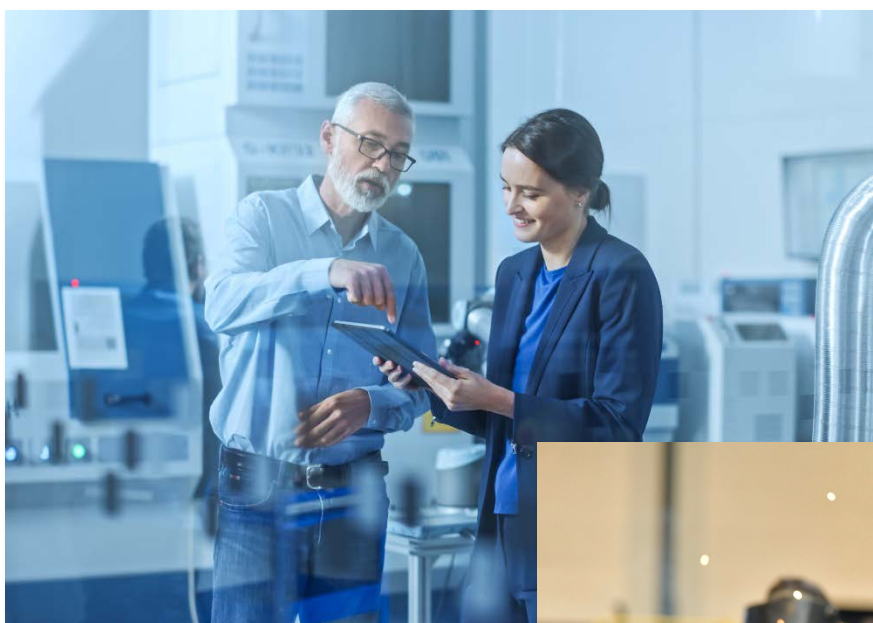


Apprenticeship Program Reviews



Quick Reference Guide
for Registered Apprenticeship Program Sponsors

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Introduction

The information in this document is intended to provide sponsors of registered apprenticeship programs (RAPs) an overview of the apprenticeship program review process.

What is an Apprenticeship Program Review?

An apprenticeship program review is a comprehensive review of all aspects of a registered apprenticeship program's performance.

The registration agency conducts program reviews to assess the overall condition of a sponsor's program and compliance with its registered Standards and the relevant federal regulations (see below), including but not limited to determining if apprentices are receiving:



- On-the-job training in all phases of the apprenticeable occupation
- Scheduled wage increases consistent with the sponsor's registered Standards
- Related instruction through appropriate curriculum and delivery systems
- Equal opportunity in all aspects of the apprenticeship program, in accordance with relevant federal regulations (see below)
- Affirmative action requirements (as applicable)

Program reviews allow the registration agency the opportunity to provide support and technical assistance to ensure sponsors are meeting their obligations complying with the following federal regulations governing RAPs:

- Title 29 CFR part 29, subpart A (Registered Apprenticeship Programs)
- Title 29 CFR part 30 (Equal Employment Opportunity in Apprenticeship)



Scheduling Program Reviews

The registration agency will contact the sponsor to schedule the program review and to let the sponsor know what to expect during the review.

The registration agency schedules and conducts program reviews:

- End of 1st year of program operation (Provisional)
- End of 1st full training cycle
- Subsequently at least once in every 5-year span
- Outside planned review schedule if the registration agency receives:

- Credible information of a sponsor’s failure to conform to its Standards or to relevant CFR regulations
- Aa written complaint of a sponsor’s failure to conform



Tools Used to Document all Aspects of the Program Review

There are two tools that the registration agency uses to guide the program reviewer through the review process: The APR Tool and the EAPR Tool.

APR Tool

The APR Tool is the primary instrument for recording information identified during APRs. It consists of seven checklists, as shown in **Figure 1**. These checklists walk the registration agency through the process of collecting information about the sponsor’s compliance with the labor standards contained in Title 29 CFT Part 29, Subpart A and the EEO responsibilities for all RAPs contained in Part 30.

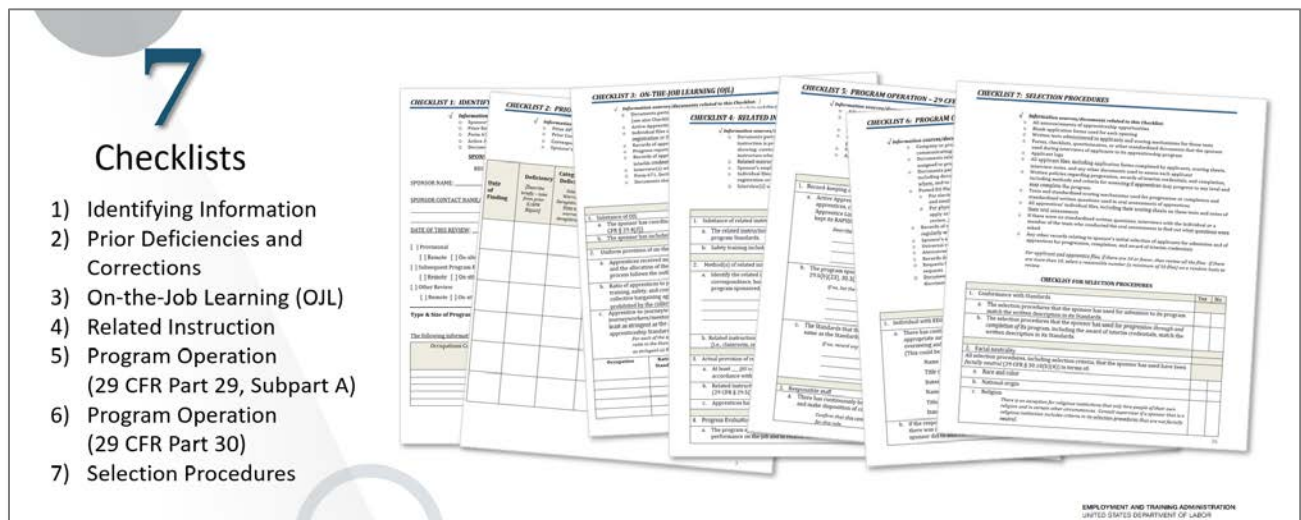


Figure 1: Seven Checklists in the APR Tool

EAPR Tool

The EAPR Tool is the primary instrument for recording information identified during EAPRs. It consists of five Checklists, numbered 8 through 12, as shown in **Figure 2**. The EAPR checklists guide the registration agency through their review of the sponsor’s compliance with 29 CFR part 30—those aspects that apply to apprenticeship programs that are required to develop AAPs.

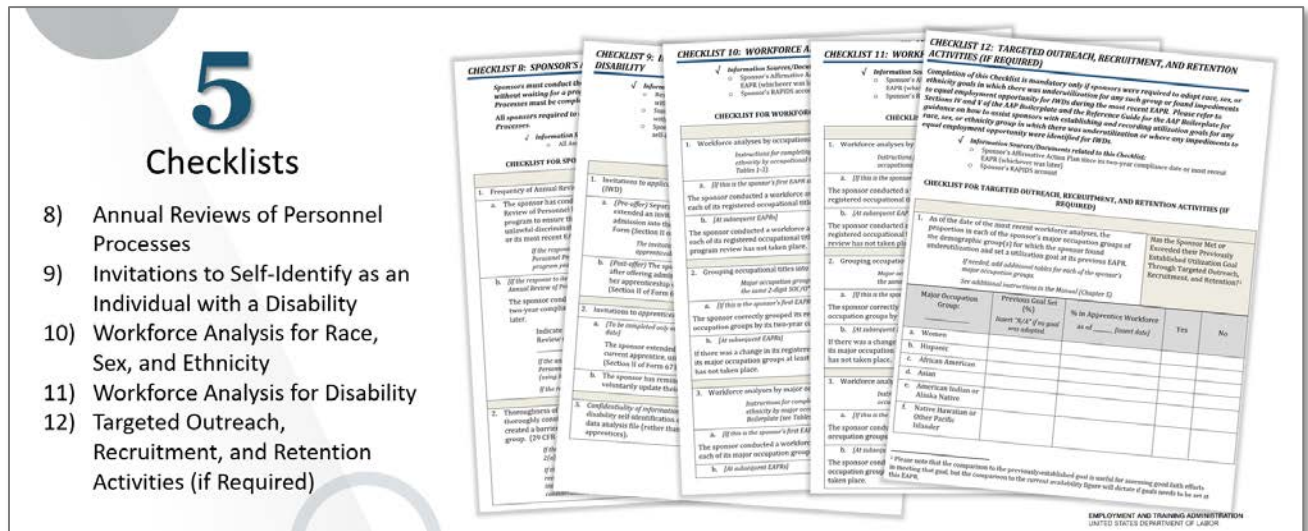


Figure 2: Five Checklists in the EAPR Tool

Three Components of the Program Review

A program review consists of three parts as shown in **Figure 3**: the desk review, the in-person review, and the analysis of findings. This section provides an overview of the activities and tasks in each component.



Figure 3: Three components of a program review



1) Desk Review

The first component of the program review is the desk review. During the desk review, the registration agency gathers and reviews the RAP's documents and data currently on file or in RAPIDS to get familiar with the information and prepare for the in-person review.

The registration agency may ask the sponsor or sponsor's representative to provide additional information or documentation or to update information in RAPIDS. Please respond to such requests in a timely manner.

Notice of Review

After a conversation with the sponsor's representative, the registration agency will send a written Notice of Review to the sponsor confirming the date and time of the review. **Figure 4** contains a list of elements included in the Notice.

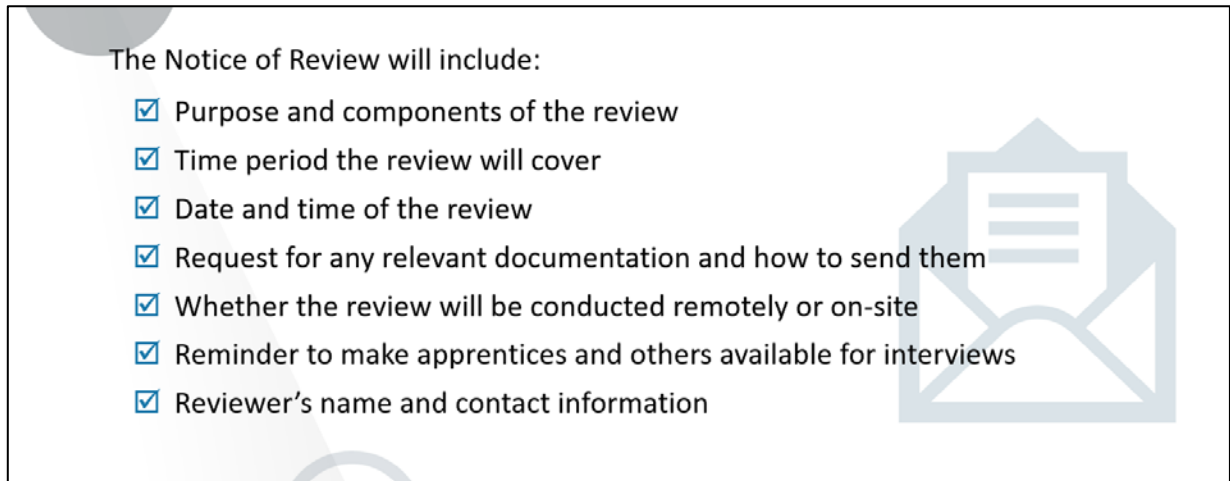


Figure 4: Elements of a Notice of Review



2) In-Person Review

The second component of the program review is the in-person review, which is conducted either on-site at the sponsor's location, participating employers' worksites, and/or related-instruction venues; or remotely, at the registration agency's discretion.

The in-person review is a multi-faceted assessment that is designed to help the registration agency gain a complete picture of a registered apprenticeship program's overall operations and an understanding of the apprentices' experiences within the program. This in-depth review provides an opportunity for sponsors to ask questions and for the registration agency staff to provide technical assistance to help the sponsor comply with 29 CFR part 29, subpart A and 29 CFR part 30.

During the in-person review, the registration agency staff member will:

- ✓ Meet with the sponsor's designated representative to verify, clarify, and fill in any gaps in the information gathered during the desk review
- ✓ Review required records and files
- ✓ Interview at least one apprentice and others as appropriate (e.g., journeyworkers, supervisors, managers, etc.)

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- ✓ Conduct a visual check of at least one worksite, if appropriate
- ✓ Conduct a visual check of the related instruction training site, if appropriate
- ✓ Provide technical assistance as needed to support the sponsor in complying with 29 CFR part 29, subpart A and 29 CFR part 30

For sponsors with five or more apprentices, the registration agency will also:

- ✓ Provide technical assistance as needed to support the sponsor in complying with 29 CFR part 30—those parts that apply to sponsors with five or more apprentices and who are required to develop an Affirmative Action Plan
- ✓ Conduct or review the sponsor’s demographic analyses
- ✓ Review any prior demographic analyses and determine whether the sponsor had any underutilized groups
- ✓ If applicable, review the sponsor’s progress toward their utilization goals
- ✓ If applicable, establish goals for targeted outreach, recruitment, and retention activities

The sponsor or sponsor’s representative will:

- ✓ Provide program and apprenticeship records for review (see **Appendix A: Records Reviewed During Program Reviews** for a list of required records and files)
- ✓ Answer questions to clarify, verify, or fill in gaps in information needed for the program review
- ✓ Make available for interview apprentices and others (e.g., journeyworkers mentors, supervisors, etc.) agreed upon with the registration agency
- ✓ Conduct demographic analyses (if required)
- ✓ Establish goals for targeted outreach, recruitment, and retention activities (if required)

Safety and Diversity, Equity, Inclusion, and Accessibility

We always want to promote safety, as well as diversity, equity, inclusion, and accessibility. **Figure 5** lists some of the items the registration agency will look for regarding these issues during the visual check portion of the in-person review.

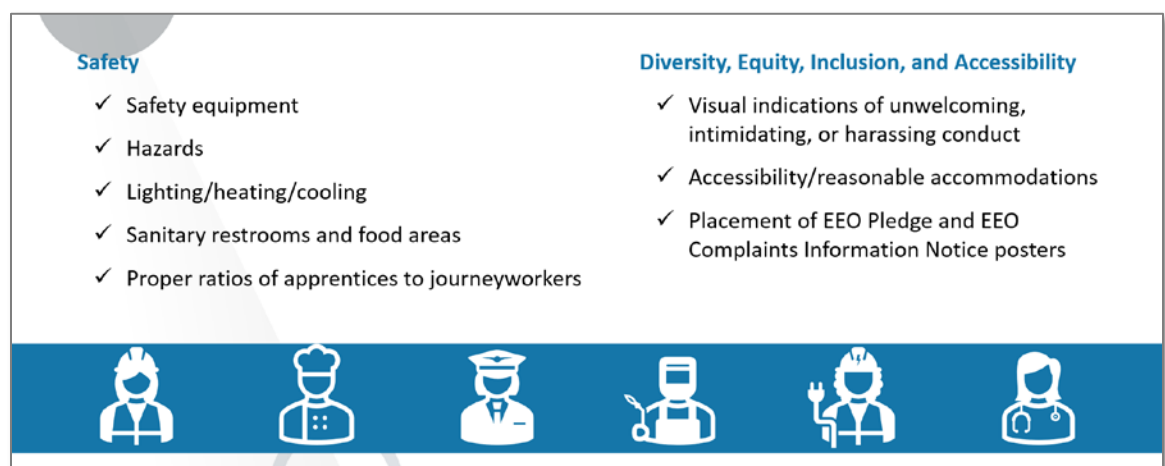


Figure 5: Safety and diversity, equity, inclusion, and accessibility items the registration agency reviewer will look for

Affirmative Action Plan

If the sponsor has five or more apprentices, the program review will include a review of the sponsor's Affirmative Action Plan. Remember that, according to the requirements, unless the program has an exemption, the initial Affirmative Action Plan must be completed within two years of registration and must be updated every time the sponsor completes demographic analyses.

The four major elements that sponsors must include in their Affirmative Action Plans are described in **Figure 6**.

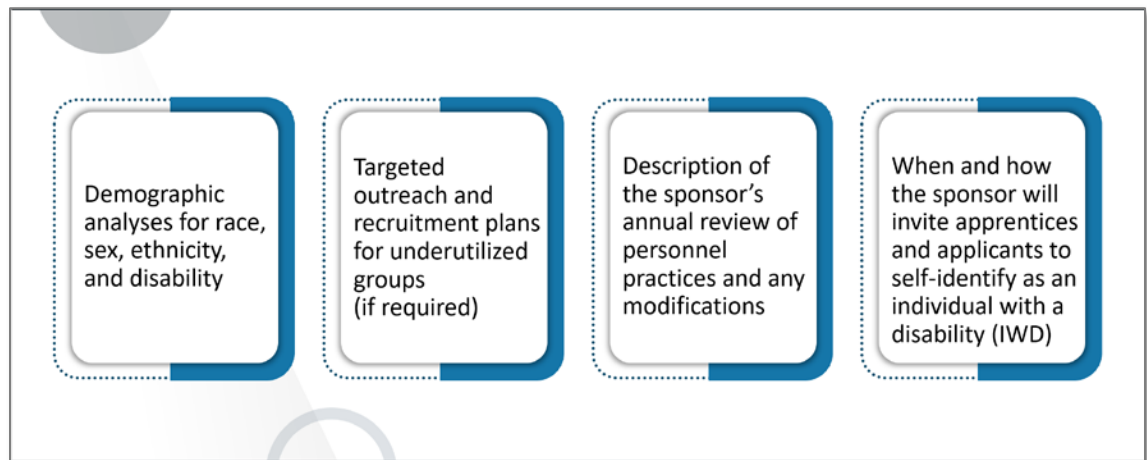


Figure 6: Four elements of an Affirmative Action Plan

Demographic Analyses

Sponsors with five or more apprentices who are required to develop an Affirmative Action Plan must conduct demographic analyses to examine the effectiveness of their diversity and inclusion efforts. Contact your registration agency for assistance in conducting the analyses. See **Appendix B** for detailed information on demographic analyses.



3) Analysis of Findings

The final component of the program review is the analysis of the sponsor's records and results of the in-person review. During this phase, the registration agency will carefully review the information gathered and determine its findings as to whether there are any deficiencies that must be corrected by the sponsor.

Notice of Review Findings

Once the registration agency has analyzed the information gathered during the desk review and in-person review, it will send a Notice of Review Findings to the sponsor. The Notice will inform the sponsor of four items:

1. Any deficiency(ies) identified
2. How to remedy the deficiency(ies), if applicable

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3. The timeframe within which the deficiency(ies) must be corrected, and
4. A description of the potential enforcement actions that may be undertaken if compliance is not achieved within the required timeframe

Sponsor Timelines to Respond to Notice of Review Findings

If the Notice of Review Findings identifies any discrepancies that the sponsor must remedy, the sponsor has two response options:

Option 1: Agree with the findings and remedies and submit a compliance action plan

Option 2: Disagree with the findings and/or remedies and submit a written rebuttal

For each option, the sponsor has deadlines by which to respond, as shown in the following table.

	29 CFR Part 29, Subpart A	29 CFR Part 30
Option 1	Corrective action period	Create and submit a compliance action plan
Option 2	None	Submit a written rebuttal
Deadline	Within 30 calendar days	Within 30 business days
Deadline Extension*	Another 30 days for good cause	Another 30 days for good cause

Sponsor’s Compliance Action Plan

A sponsor’s compliance action plan must include all the elements listed in **Figure 7**.

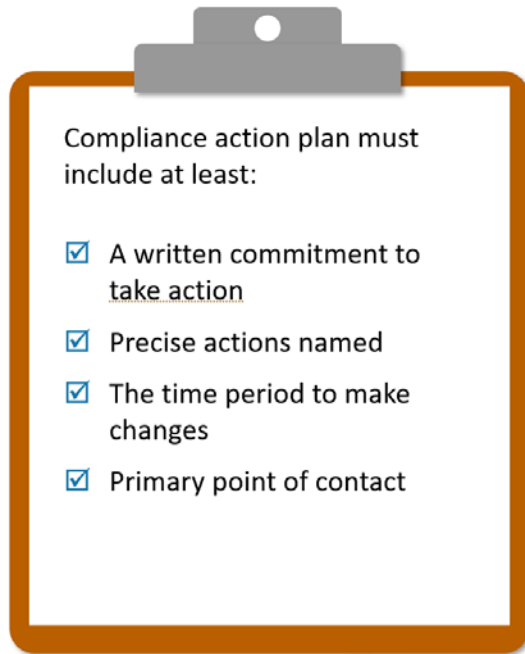


Figure 7: Required elements of a sponsor’s compliance action plan

Registration Agency’s Response to the Sponsor’s Written Rebuttal

If a sponsor submits a written rebuttal, the registration agency will determine one of three possible outcomes that will be documented as shown in the following table.

	Option #1	Option #2	Option #3
Registration Agency’s Decision	Agrees with all rebutted items	Agrees to some rebutted items	Upholds the original Notice of Findings with no changes
Registration Agency’s Recommendation	Amended	Amended	Upheld
Written Notice	New Notice of Findings	Amended Notice of Findings after sponsor submits compliance action plan	Notice: Compliance action plan due
Findings Within the Notice	No findings of deficiency	Findings for the areas identified	Uphold original findings

After Closeout of the Program Review

It is important to note that the responsibilities of the registration agency and the sponsor do not end when the program review is closed out the registration agency. The registration agency is committed to supporting sponsors in implementing the corrective actions outlined in the sponsor's compliance action plan and providing technical assistance as needed. In turn, sponsors must make a good faith effort to implement the corrective actions and to conduct targeted outreach and recruitment activities if demographic analyses reveal underutilization of any protected groups.

For More Information

For detailed information on program reviews, contact your registration agency.

Appendix A: Records Reviewed During Program Reviews

Each Registered Apprenticeship Program Sponsor shall keep records in accordance with the regulations at Title 29, CFR parts 29.5(23), 30.4, and 30.8

1. SPONSOR'S PROGRAM RECORDS RELATING TO TITLE 29 CFR PART 29

- a. Current registered apprenticeship program Standards, with appendices
- b. List of and Agreement(s) with participating employers (Group Programs Only)
- c. Administrative and operational files relating to the Apprenticeship Program
- d. Records relating to correcting any uncorrected deficiencies relating to Title 29 CFR parts 29 and 30 found in prior compliance reviews¹
- e. Records of orientation sessions and periodic information held for new and current apprentices, and other employees
- f. Records of anti-harassment training, including documentation of the training that was provided, when, and to whom
- g. Any other records pertinent to determining compliance with Title 29 CFR parts 29 and 30

2. ANY AGREEMENTS PERTAINING TO EMPLOYMENT OF APPRENTICES, TO WHICH THE SPONSOR IS A PARTY (if applicable)

- a. Collective bargaining agreements
- b. Community benefits agreements
- c. Project labor agreements
- d. Pre-Apprenticeship linkage
- e. Direct Entry agreements

3. ALL CURRENTLY ACTIVE APPRENTICES' FILES

- a. Apprenticeship agreement for each apprentice
- b. Records that show, for each apprentice:
 - (1) On-the-job learning hours, including totals by work category
 - (2) List of their job assignments
 - (3) Pay (current rate of pay and any past changes to pay)
 - (4) Related instruction hours
 - (5) Progress reports and other evaluations of apprentices' performance
 - (6) Apprentice actions (including disciplinary, credit for knowledge or experience, promotions, layoffs, terminations, etc.)

4. DOCUMENTS SHOWING CURRENT JOURNEYWORKER INFORMATION

- a. Current rate of pay for each occupation
- b. Total number in workforce and each occupation, including demographics of:
 - i. African American
 - ii. Hispanic
 - iii. Asian
 - iv. American Indian or Alaska Native
 - v. Native Hawaiian or Other Pacific Islander
 - vi. Women

¹Correspondence with the Registration Agency about these deficiencies or corrections need not be produced.

5. DOCUMENTS PERTAINING TO OJL WORK PROCESS SCHEDULE (FOR EACH OCCUPATION)

6. DOCUMENTS PERTAINING TO CURRICULUM, INSTRUCTORS, AND ADMINISTRATION OF RELATED INSTRUCTION (FOR EACH OCCUPATION)

7. WRITTEN COMPANY EMPLOYMENT-RELATED POLICIES

- a. Physical and electronic company handbooks, manuals, Internet and Intranet pages, and similar documents reflecting company employment-related policy as of the date of the request letter (or a later date of the sponsor's choosing)
- b. Sponsor's procedures for handling complaints about harassment and intimidation and retaliation for engaging in protected activity
- c. A copy of all publications, including electronic publications, containing the sponsor's Equal Opportunity Pledge

8. FILES RELATING TO RECRUITMENT AND SELECTION OF APPRENTICES FOR OPENINGS

- a. Most recently prepared list of recruitment sources that will generate referrals from all demographic groups (universal recruitment-source list)
- b. Announcement(s) of apprenticeship openings occurring since the last program review or 5 years, whichever is more recent.
- c. Records demonstrating to whom, when, and how these announcements were sent
- d. Documentation of responses from organizations contacted
- e. Records relating to the process by which the sponsor selected all apprentices who were enrolled since the last program review, including:
 - (1) All applicants' original applications
 - (2) Documentation relating to applicants' qualifications
 - (3) Test results and scoring sheets for each test administered
 - (4) Any supporting documentation that can validate selection procedures
 - (5) Records of the basis of selection or rejection
 - (6) Interview records
 - (7) Ranking lists (lists of qualified applicants in order by rating total (education, experience, interview))
 - (8) Applicant rating form, including interview scores
 - (9) Letters of rejection or acceptance
 - (10) Any other notifications to any applicant(s) regarding qualification/lack of qualification
 - (11) Applicant log(s) or other documents showing, for each apprentice class:
 - i. Applicant name
 - ii. Race²
 - iii. Ethnicity (Hispanic or non-Hispanic)
 - iv. Sex (including pregnancy, sexual orientation, and gender identity)
 - v. A summary of the qualifications of each applicant
 - vi. Date of application
 - vii. Date of interview (if applicable)
 - viii. Applicant score (if applicable)
 - ix. Final disposition and date

² Per the White House Office of Management and Budget's Standards for the Classification of Federal Data on Race and Ethnicity, race should be broken down into the following categories:

- a. African American
- b. Asian
- c. American Indian or Alaska Native
- d. Native Hawaiian or Other Pacific Islander

9. SPONSOR'S PROGRAM RECORDS RELATING TO EEO OR COMPLIANCE WITH TITLE 29 CFR PART 30 IN GENERAL (SINCE THE PROGRAM'S PREVIOUS REVIEW) (if applicable)

- a. Orders and findings by, and conciliation agreements and settlements approved by, courts, government agencies, or arbitrators pertaining to the sponsor's provision of equal employment or educational opportunity
- b. Any correspondence with the U.S. Equal Employment Opportunity Commission, state or local FEP Agency, U.S. Department of Education Office of Civil Rights, or other relevant agency about the sponsor's provision of equal employment or educational opportunity
- c. Any private settlements of allegations of violations of equal employment or educational opportunity laws that the sponsor has entered into, whether confidential or otherwise

The following additional records pertain to sponsors with five or more apprentices who are required to develop an Affirmative Action Plan.

10. RECORDS PERTAINING TO AFFIRMATIVE ACTION PLAN

- a. Current approved Affirmative Action Plan
- b. Annual review of personnel processes
- c. Invitations to self-identify as an individual with a disability and Voluntary Disability Self-Identification Forms
- d. Affirmative Action Program Goals Determination Worksheet

11. SPONSOR'S PROGRAM RECORDS RELATING TO 29 CFR PARTS 29 AND 30

- a. Current registered apprenticeship program Standards, with appendices
- b. List of and Agreement(s) with participating employers (Group Programs Only)
- c. Administrative and operational files relating to the Apprenticeship Program
- d. Records relating to correcting any uncorrected deficiencies relating to 29 CFR parts 29 and 30 found in prior reviews³
- e. Records of orientation sessions and periodic information held for new and current apprentices, and other employees
- f. Records of anti-harassment training, including documentation of the training that was provided, when, and to whom
- g. Any other records pertinent to determining compliance with 29 CFR parts 29 and 30

³Correspondence with the Registration Agency about these deficiencies or corrections need not be produced.


Appendix B: Demographic Analyses

Demographic analyses are conducted at different points throughout the program lifecycle. See **Figure 8** through **Figure 11** below for key information related to conducting demographic analyses.

Purpose of Demographic Analyses

One aspect of Affirmative Action Programs:

- Looks at race, sex, and ethnic characteristics
- Compares the demographics of a sponsor’s apprentice workforce to the demographics of the workforce in the recruitment area
- Indicates how well sponsors are using all available qualified talent and if additional steps are needed to increase representation



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UNITED STATES DEPARTMENT OF LABOR

Figure 8: Purpose of demographic analyses

How to conduct demographic analyses

Workforce Analysis (Sponsor conducts)	Availability Analysis (Sponsor conducts with OA)	Utilization Analysis (Sponsor conducts)
<ul style="list-style-type: none"> • Group occupations by major occupational group • Identify the demographic composition of the program’s apprentice workforce by race, sex, ethnicity, and disability status, compiled by occupational title for each occupation in an occupational title or major occupation group 	<ul style="list-style-type: none"> • Estimates the number of qualified individuals available for apprenticeship in the sponsor’s recruitment area by race, ethnicity, and sex. (29 CFR § 30.5(c)(2).) • Expressed as a percentage <p style="font-size: small; margin-top: 10px;">NOTE: Availability analysis is not done for disability</p>	<ul style="list-style-type: none"> • Determines whether the demographics of the apprentices in the program reflect the composition of the persons available for apprenticeship in the sponsor’s recruitment area • For IWDs, determines whether the program is meeting the aspirational 7% utilization goal

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Figure 9: How to conduct demographic analyses

When to conduct demographic analyses

Analysis	Second anniversary of program registration	First program review following 2 nd anniversary of program registration	Every three years after the first program review	Each subsequent program review
Workforce Analysis	X	X	X	X
Availability Analysis		X		X
Utilization Analysis		X		X

- 2nd anniversary of the program’s initial registration—workforce analysis only
- 1st program review following program registration 2nd anniversary and each subsequent program review—all demographic analyses
- Every three years after that—workforce analysis only

Figure 10: When to conduct demographic analyses

Setting utilization goals and targeted outreach

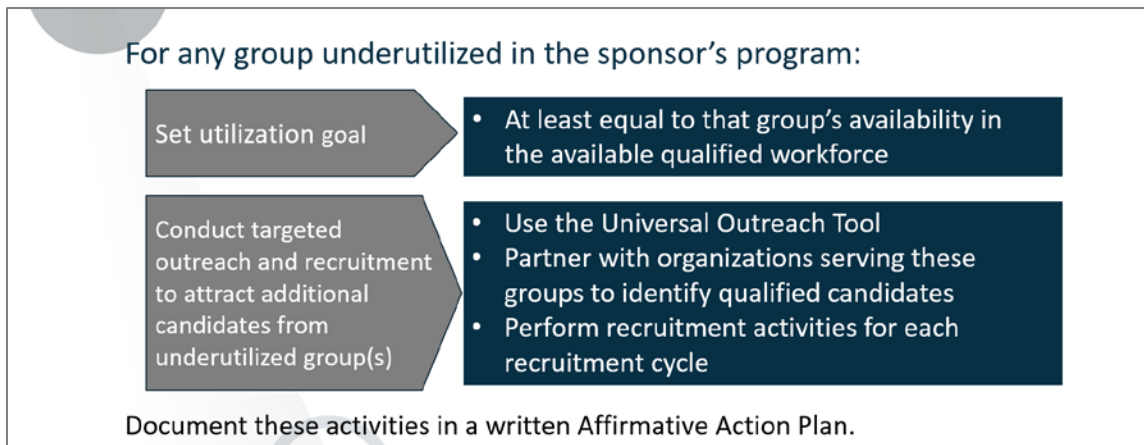


Figure 11: Setting utilization goals and targeted outreach and recruitment activities

What are disparities and why must sponsors assess their significance?

A central premise underlying affirmative action is that absent discrimination, over time, a sponsor’s apprenticeship program, generally, will reflect the sex (including pregnancy, sexual orientation, and gender identity), race, ethnicity, and disability profile of the labor pools from which the sponsor recruits and selects. As part of their Affirmative Action Programs (AAPs), sponsors assess whether possible barriers to apprenticeship exist for particular groups of individuals by determining whether the race, sex, and ethnicity of apprentices their program is reflective of persons available for apprenticeship by race, sex, and ethnicity in their relevant recruitment area.⁴ If there is a significant disparity between the utilization and availability for women, Hispanics or Latinos, or a particular racial minority group, the sponsor must adopt a utilization goal for that group in its apprenticeship program. The “significance” requirement distinguishes between disparities

that occur within a tolerance level and those that are greater than would reasonably be expected given the availability of eligible individuals from the population group.

That's why assessing the statistical significance of any disparity between a gender, racial, or ethnic group's utilization and its availability is a key step in the AAP process.

What are the methods for assessing the significance of disparities?

While sponsors may choose any "appropriate" method of statistical analysis to assess the significance of disparities, the two most commonly used are **the 80% (or four-fifths) rule** and **the two standard deviations statistical test**. These two methods are specifically endorsed as "appropriate" in the Preamble to the 2016 update to the Apprenticeship EEO regulations.

- The **80% rule** determines if utilization is below 80% of that group's availability. According to the *Uniform Guidelines on Employee Selection Procedures 41 CFR § 60-3.4(D)* "A selection rate for any race, sex, or ethnic group which is less than four-fifths (4/5) (or eighty percent) of the rate for the group with the highest rate will generally be regarded by the Federal enforcement agencies as evidence of adverse impact." *The Uniform Guidelines on Employee Selection Procedures 41 CFR § 60-3.4(D), are explicitly incorporated into the Apprenticeship EEO regulations by 29 CFR § 30.10.*
- The **two standard deviations method** determines if utilization is more than two standard deviations below availability. If so, the difference between them is considered "significant."
Two standard deviations is a statistical computation that predicts the likelihood of an outcome – in this case, the outcome of utilization being less than availability. Its use for assessing employment discrimination was endorsed by the Supreme Court in Hazelwood School Dist. v. United States, 433 U.S. 299, 308-309 n.14 (1977).

NOTE: Whatever method the sponsor chooses, it must apply the same method to assess the significance of disparities for each gender, racial, and ethnic group. For example, a sponsor cannot use the 80% rule to assess the disparity for African Americans but the two standard deviations test to assess the disparity for women.

How can we do these calculations?

1. The Department's Demographic Analysis Tool (DAT) automatically calculates disparities using the 80% rule for all programs. If a program has 30 or more apprentices, the DAT also automatically calculates statistical significance using the two standard deviations method.

Sponsors who choose not to use the automated approach to computing disparities offered by the DAT may instead elect to perform the necessary calculations manually on their own, or with the assistance of a professional with expertise in statistical analysis. However, as these calculations are complex, we strongly encourage program sponsors to consider using the DAT to reduce administrative burdens and ensure mathematical accuracy.

2. For a program that cannot use the DAT (for example, if a program recruits apprentices only from its incumbent workforce), manually compute using the following formulas:
 - a. **The 80% rule.**

Calculate the ratio of the utilization of the group to their availability.

Steps:

- 1) Calculate the Expected # Available based on the Percentage Available in Race/Ethnic EEO group or Gender group.
 This is the Total # of Employees in an EEO Job Category (X %) of Availability for Race/Ethnic EEO group or Gender group (Available Labor Market %)
 For instance, if the program has 40 percent of their program is female; compared with the 51 percent of females in the respective Available Labor Market.
- 2) Calculate 80 percent of the Expected number Available: 80% X Expected Available in Race/Ethnic EEO group or Gender group
- 3) Compare 80 percent of Expected Available number to Utilized number in each major occupation group (employees in each major occupation group within the apprenticeship workforce). *If the number Utilized in Workforce for the Race/Ethnic EEO group or Gender group is less than 80% of Expected number Available for the group, then underutilization is declared.*

b. Two standard deviation method.

The mathematical formulation for calculating the standard deviation is the square root of the product of the availability (A) of a group (expressed as a fraction) times one minus that availability(1-A), multiplied by the total number of apprentices in the workforce (N).

Steps:

- 1) 'A' equals the percentage availability of a group, and
- 2) 'N' equals the number of apprentices in the sponsor's program --
 - Standard deviation = $\sqrt{A*(1-A)*N}$
 - Two standard deviations = $2 * (\sqrt{A*(1-A)*N})$

Is there a calculation example?

Using the following data:

	Total #	# Female	% Female
Individuals in apprenticeship program (utilization)	100	20	20%
Eligible individuals in relevant recruitment area (availability)	1000	600	60%

a. 80% Method

- Utilization = 20%
- Availability = 60%
- Ratio of utilization to availability = 20% / 60% = 33%

Since 33% is less than 80%, this is an impactful disparity under the 80% Rule.

b. Two Standard Deviation Method

STEP	INSTRUCTIONS
1	Calculate $A*(1-A)*N$. That is, multiply A by 1-A, and then multiply that product by N. In this example: $A = .6$; $1-A = .4$; and $N = 100$. So, $A*(1-A)*N = .6*(1.00-.6)*100 = 24$.
2	Find the square root of this product; this is one standard deviation. In this example: the square root of 24 is 4.9.
3	Double the square root; this is two standard deviations. In this example: $4.9*2 = 9.8$.
4	Calculate the expected number of apprentices from the relevant race/sex/ethnic group by multiplying their percentage availability (A) by the total number of apprentices in their program (N). <ul style="list-style-type: none"> ▪ $A = 60\%$ ▪ $N = 100$ ▪ $A*N = 60\% * 100 = 60$ Thus, here, the expected number of female apprentices is 60.
5	Subtract the number of female apprentices in the program from the expected number of female apprentices. In this example: $60 - 20$, or 40.
6	If this difference is greater than two standard deviations, the disparity is significant. In this example: 40 is greater than 9.8. Since 40 is greater than 9.8, this disparity is significant under the two standard deviations methodology.

Tools and Resources for Conducting Demographic Analyses

The following table provides resources to assist RAP sponsors with demographic analyses.

To find:	Use these resources:
General information on demographic analyses	www.apprenticeship.gov/eo/sponsors/create-your-plan
User instructions and desk aids for the Demographic Analysis Tool (DAT)	Log into your RAPIDS account and navigate to the Affirmative Action Plan Builder
Help from your Apprenticeship Office in conducting demographic analyses	www.apprenticeship.gov/contact-us
Information on identifying and	www.apprenticeship.gov/eo/protected-

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removing impediments for individuals with disabilities	characteristics/disability
Information on targeted outreach and recruitment	www.apprenticeship.gov/eeo/sponsors/recruit-and-hire