



Appendix C

AFFIRMATIVE ACTION PLAN

ADOPTED BY

TX014720001-IEC DALLAS

AS REQUIRED UNDER 29 CODE OF FEDERAL REGULATIONS PART 30

**DEVELOPED IN COOPERATION WITH THE
U. S. DEPARTMENT OF LABOR, OFFICE OF APPRENTICESHIP**

(Registration Agency Representative Signature)

(Registration Agency Representative Typed/Printed Name)

(Title)

(Date)

This Affirmative Action Plan template is provided by the U.S. Department of Labor, Office of Apprenticeship, for the convenience of apprenticeship program sponsors. Its use is recommended to promote understanding of, and compliance with, the Department's EEO in Apprenticeship rules at 29 CFR Part 30.

Please supply all requested information, unless otherwise directed by the form. If needed, use additional pages to complete responses.



AFFIRMATIVE ACTION PLAN

We, TX014720001-IEC DALLAS, adopt this written Affirmative Action Plan (“written AAP” or “Plan”) in good faith to promote equality of opportunity in our registered apprenticeship program. This written AAP is a part our apprenticeship Standards. We also incorporate by reference the Equal Opportunity Pledge contained in the Standards for this program.

This written AAP, which is based upon the minimum requirements for AAP contained in the equal opportunity in apprenticeship final regulation located at 29 CFR Part 30, is composed of nine key components. Each of these components requires us to examine different aspects of our apprentice workforce and document our review. At various stages of our review, we will analyze our utilization, recruitment activities, and selection, training, and assignment practices in order to ensure that all elements of our apprenticeship program are in accordance with equal employment opportunity requirements.

The key components of this AAP are as follows:

- Section I: Workforce Analysis for race, sex, and ethnicity (by occupation title and by major occupation group);
- Section II: Availability Analysis for race, sex, and ethnicity (by major occupation group);
- Section III: Utilization Analysis (comparing the workforce and availability analyses);
- Section IV: Utilization goals for race, sex, and ethnicity (if necessary);
- Section V: Utilization goals for individuals with disabilities;
- Section VI: Targeted outreach, recruitment, and retention activities (if necessary);
- Section VII: Annual review of personnel processes;
- Section VIII: Invitation to self-identify as an individual with a disability;
- Section IX: Official adoption of the written AAP.

Abbreviations Key:

Please note that the following abbreviations denoting relevant racial and ethnic groups appear in the demographic charts contained in this written AAP (Appendix C):

HISP = Hispanic;
AA = African American/Black;
AS = Asian;
AIAN = American Indian or Alaska Native;
NHPI = Native Hawaiian or Other Pacific Islander.

NOTE: For detailed definitions of the above racial and ethnic groups, please see Attachment 1 of the Reference Guide.

PLEASE NOTE: To collect the demographic information on your apprentice workforce requested in Sections I through VIII below, you should consult the data supplied by your program’s apprentices in ETA Form 671. In addition, to ensure timely compliance with the AAP requirements contained in 29 CFR Part 30, you should keep a record of the date(s) on which you completed the analyses and activities described in Sections I through VIII below.



SECTION I – WORKFORCE ANALYSIS FOR RACE, SEX, AND ETHNICITY (BY OCCUPATION TITLE AND BY MAJOR OCCUPATION GROUP)

The apprentice information needed to complete this workforce analysis section is available in the Registered Apprenticeship Partners Information Data System (RAPIDS) for all federally registered programs in the Office of Apprenticeship (OA) States, and for many state programs managed by State Apprenticeship Agencies (SAAs). Access to RAPIDS is available at: <https://dol.appiancloud.com/suite/sites/oa>. Sponsors that are not required to use RAPIDS to manage their apprentices are encouraged to work with the appropriate SAA to complete their workforce analysis.

The following terms are used in this section:

- An **Occupation Title** is a specific occupation that has been assigned a 6-digit “detailed occupation” code in the U.S. Bureau of Labor Statistics’ Standard Occupational Classification and Coding Structure (SOC), <https://www.bls.gov/soc/>, and a corresponding 8-digit code in the Occupational Information Network (O*NET), <https://www.onetonline.org/>. Detailed occupations are defined so that each includes workers who perform similar job tasks based on work performed and, in some cases, on the skills, education and/or training needed to perform the work. For the purposes of completing the workforce analysis, occupation titles are defined by the 8-digit O*NET code. Sponsors can locate the O*NET code associated with their registered occupations from the program occupation tab in RAPIDS.
- A **Major Occupation Group** is the highest-level classification in the SOC, which combines related occupations into major occupation groups. These Major Occupation Groups are designated by the two-digit SOC code and the two-digit prefix of the O*NET code. (*See Attachment 2, “Standard Occupational Classification and Coding Structure” in the accompanying Reference Guide for a complete list of the 23 major occupation groups and their two-digit SOC/O*NET code designations*).

Example: A sponsor has an apprenticeship program that offers training in four different occupation titles: Roofer (SOC/O*NET code: 47-2181.00), Electrician (SOC/O*NET code: 47-2111.00), Tool and Die Maker (SOC/O*NET Code: 51-4111.00), and Machinist (SOC/O*NET code: 51-4041.00). In completing Tables 1, 2, and 3 of the workforce analysis below, the sponsor will enter identifying characteristics for their apprenticeship workforce by utilizing the Occupation Titles and the corresponding SOC/O*NET codes for each of those titles.

In completing Tables 4, 5, and 6 of the analysis, however, the sponsor will classify their apprentice workforce by the two Major Occupation Groups that encompass these titles: Construction (2-digit SOC/O*NET code: 47) and Manufacturing (2-digit SOC/O*NET code: 51).



INSTRUCTIONS FOR COMPLETING THE WORKFORCE ANALYSIS

In completing the tables (1 through 6) contained in this Section I, sponsors should utilize the demographic identification provided by apprentices in their Program Registration and Apprenticeship Agreements (see Form 671, Section II).¹ If you are a RAPIDS user, the workforce analysis is available as a report in the system. As noted above, sponsors that are not required to use RAPIDS to manage their apprentices are encouraged to work with the appropriate SAA to complete their workforce analysis.

A. Workforce Analysis by Occupation Title for Sex, Ethnicity, and Race

NOTE: The workforce analyses by occupation title for sex, ethnicity, and race contained in Tables 1, 2, and 3 in this Section should initially be completed by the second anniversary of the apprenticeship program’s registration with a Registration Agency. Subsequent workforce analyses for sex, ethnicity, and race should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

Instructions:

For each **Occupation Title** in a program, please indicate the total number of **responses** received from apprentices that self-identify for sex, ethnicity, and race in the following tables:

TABLE 1 – Occupation Titles by Sex

Number of Responses Selecting a Sex				
Occupation Title	8-Digit O*NET Code	Female	Male	Total
Electricians	47-2111.00	15	522	537

TABLE 2 – Occupation Titles by Ethnicity

Number of Responses Selecting an Ethnicity				
Occupation Title	8-Digit O*NET Code	HISP	NON-HISP	Total
Electricians	47-2111.00	333	185	518

¹ Self-identification is the most reliable method and preferred method for compiling information about a person’s sex, race, and ethnicity. Sponsors are strongly encouraged to rely on employee self-identification to obtain this information. Please note that while visual observation is an acceptable method for identifying demographic data in the absence of self-identification data, it may not be reliable in every instance, and sponsors should not guess or assume the sex, race, or ethnicity of an apprentice or applicant for apprenticeship.



TABLE 3 – Occupation Titles by Race

Note: For Table 3 below, responding apprentices may elect to choose **one or more** of the specified races. If an apprentice has identified himself or herself as more than one race, count the apprentice in each of the racial categories that he or she has identified.

Number of Responses Selecting One (or More) Race							
Occupation Title	8-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total
Electricians	47-2111.00	10	41	24	5	346	424



B. Workforce Analysis by Major Occupation Group for Sex, Ethnicity, and Race

NOTE: The workforce analysis by major occupation group for sex, ethnicity, and race contained in Tables 4, 5, and 6 in this Section should initially be completed by the second anniversary of the apprenticeship program’s registration with a Registration Agency. Subsequent workforce analyses for sex, ethnicity, and race should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

Instructions:

For each **Major Occupation Group** in a program, please complete the following sex, ethnicity, and race tables.

TABLE 4 – Major Occupation Groups by Sex

Number of Responses Selecting a Sex					
Major Occupation Group	2-Digit O*NET Code	Female	Male	Total	Female Percent of Total Responses
Construction and Extraction	47	15	522	537	2.8%

TABLE 5 – Major Occupation Groups by Ethnicity

Number of Responses Selecting an Ethnicity					
Major Occupation Group	2-Digit O*NET Code	HISP	NON- HISP	Total	HISP Percent of Total Responses
Construction and Extraction	47	333	185	518	64.3%



TABLES 6.1 and 6.2 – Major Occupation Groups by Race

Note: For Table 6.1 below, responding apprentices may elect to choose **one or more** of the specified races. If an apprentice has identified himself or herself as more than one race, count the apprentice in each of the race categories that he or she has identified.

For Table 6.2 below, align the Major Occupation Groups and 2-Digit O*NET Codes with the Major Occupation Groups and 2-Digit O*NET Codes completed in Table 6.1, and compute the percentage of total responses within a racial category by comparing the number of responses selecting a particular race to the total number of responses completed in Table 6.1.

6.1 Number of Responses Selecting One (or More) Race							
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total
Construction and Extraction	47	10	41	24	5	346	424

6.2 Percent of Total Responses					
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI
Construction and Extraction	47	2.4%	9.7%	5.7%	1.2%

SECTION II – AVAILABILITY ANALYSIS FOR RACE, SEX, AND ETHNICITY (BY MAJOR OCCUPATION GROUP)

PLEASE NOTE: You should complete this section only in connection with a program review conducted by your Registration Agency. The Registration Agency will provide you with assistance in completing this section.

A. Minimum Educational Attainment Levels Required for Program Enrollment

- High School graduate (including equivalency)



B. Designated Recruitment Area for Apprentices

- External recruitment area

The geographical area from which the sponsor usually seeks or reasonably could seek apprentices when recruiting from outside of its own current employees. An external recruitment area can be an area within a specific radius of a sponsor's location; a county or counties; or a state or states.

Brief Rationale for selecting this recruitment area:

Denton, Collin, Hunt, Dallas, Rockwall, Kaufman, Ellis



C. Specifying the External Recruitment Area

I If you are utilizing an **External Recruitment Area**, please complete the following items:

For each Major Occupation Group, we seek (or reasonably could seek) individuals who live in the following geographical zones or jurisdiction(s)

- A geographical zone that is a specified radius from the sponsor's program location

100 miles



SECTION III: UTILIZATION ANALYSIS (COMPARING THE WORKFORCE AND AVAILABILITY ANALYSES)

NOTE: The utilization analysis contained in this Section should initially be completed, **with the assistance of the Registration Agency**, at the first program review after the second anniversary of registration. Subsequent utilization analyses should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

Determining Whether the Establishment of Utilization Goals Is Necessary: Methods for Utilization Analysis

A. Using the Demographic Analysis Tool

OA strongly encourages you to use the electronic **Demographic Analysis Tool (DAT)**² to conduct a utilization analysis because it provides a streamlined process for conducting the analysis, and also utilizes the most accurate, up-to-date national demographic data. **You are eligible to utilize the DAT if you satisfy ALL of the following criteria:**

- If, for a Major Occupation Group, you do not require applicants to meet credentials or skills beyond those specified in the minimum educational attainment checkboxes in Section II. A (*see Section II. A above*);
- If, for a Major Occupation Group, you recruit apprentices **solely** from an **external recruitment area** (i.e., you choose to establish a recruitment area that is based on a source derived from U.S. Census Bureau data) (*see Section II. B above*), AND
- You choose to utilize either the “80% method” or the “two standard deviations method” (which are described in Section III. B below) for conducting a utilization analysis.

PLEASE NOTE: If you do **not** meet each of the three criteria listed above, you should contact the Registration Agency for assistance in conducting your utilization analysis.

B. Applicable Methodology for Utilization Analysis Review

Select the method used to evaluate whether the utilization of women, Hispanics or Latinos, or a particular racial minority group in your workforce is significantly less than would be reasonably expected given the availability of such individuals for apprenticeship:

- 80% Method(Under the “80% method”

(Under the “80% method”, if utilization is less than 80% of availability, it is considered significantly less)

Eligible sponsors may complete the DAT by accessing RAPIDS:

<https://dol.appiancloud.com/suite/sites/oa>.

After entering the data requested by the DAT, print a copy of the DAT Report, and attach it to this written AAP (Appendix C). Then proceed to Section IV below.

² The DAT utilizes U.S. Census Bureau data derived from the [EEO Tabulation EEO-ALL07R-N1: Educational Attainment \(6\) by Younger Age Groups, Sex, and Race/Ethnicity \(Part I\) for Residence Geography, Total Population, Number](#)



SECTION IV: UTILIZATION GOALS FOR RACE, SEX, AND ETHNICITY (IF NECESSARY)

PLEASE NOTE: *If the results of your utilization analysis (Section III above) did not identify any significant underutilization of apprentices by sex, race, or ethnicity in a Major Occupation Group, you may skip this section and proceed to Section V.*

Completion of Table 7 below is only required in connection with a program review conducted by a Registration Agency. The Registration Agency will provide you with assistance in completing this section.

Based on the analyses summarized in the **DAT Report**, identify the sex/race/ethnic group(s) for which the proportion in your Major Occupation Group was significantly less than that group's availability in the relevant recruitment area(s). Record the results in **Table 7** below by copying the "yes" and "no" utilization outcomes from the **DAT Report** in the second column of the Table.

Next, enter the percentage utilization goal for any race, sex, or ethnicity group in which there was significant underutilization. The goal for any such group must at least equal the corresponding availability figure in the **DAT Report**, rounded to the nearest whole number. For any row in which the response in the second column is "no," leave the third column blank.

TABLE 7 – Underutilization of Sex, Ethnicity, and Race

47 - Construction and Extraction

Population Group	Significant Underutilization? (Yes/No) [from the DAT Report]	Goal (%) [at least equal to the corresponding figures in the DAT Report]
Women	Yes	44.94
Hisp	No	23.84
AA	Yes	15.94
AS	Yes	2.65
AIAN	No	0.55
NHPI	No	0.11

PLEASE NOTE: *The percentage goals listed in Table 7 above are not intended and will not be used by the program sponsor to discriminate against any qualified applicant or apprentice on the basis of race, color, religion, national origin, sex (including pregnancy, gender identity, and sexual orientation), sexual orientation, age (40 or older), genetic information, or disability. These goals do not supersede eligibility requirements for this apprenticeship program.*

The program sponsor will not use these goals as rigid and inflexible quotas; as either a ceiling or a floor for the selection of members of a particular group(s) as apprentices; or as a justification to extend a preference to any individual, select an individual, or adversely affect an individual's status as an apprentice. Instead, the sponsor will use these goals as objectives or targets, applying every good faith effort to make all aspects of the entire affirmative action program work and to attain the goals.



SECTION V – UTILIZATION GOALS FOR INDIVIDUALS WITH DISABILITIES

NOTE: The workforce analysis for individuals with disabilities (IWDs) in this Section should initially be completed by the second anniversary of the apprenticeship program’s registration with a Registration Agency. Subsequent workforce analyses for individuals with disabilities should be undertaken at the time of each subsequent program review (or at least once every three years if a program review does not take place).

A. Workforce Analysis for Individuals with Disabilities by Occupation Title

Table 8 below shows, for each **Occupation Title** represented in the program, the numbers of apprentices in the workforce whose responses to the question “do you have a disability?” on their most recent Voluntary Disability Disclosure Form was “yes;” “no;” or “I do not wish to answer” (or who did not return the form).

TABLE 8 - Disability Status by Occupation Title

Number of Individuals Responding to the Question: “Do you have a disability?”					
Occupation Title	8-Digit O*NET Code	Yes	No	Did not answer or return form	Total Number of Individuals Responding Either ‘Yes’ or ‘No’
Electricians	47-2111.00	13	381	152	394

B. Workforce Analysis for Individuals with Disabilities by Major Occupation Group

Table 9 below shows, for each **Major Occupation Group** represented in the program, the numbers and percentages of apprentices whose responses to the question “do you have a disability?” on their most recent Voluntary Disability Disclosure Form was “yes;” “no;” or “I do not wish to answer” (or who did not return the form).

TABLE 9 – Disability Status by Major Occupation Group

Number of Individuals Responding to the Question: “Do you have a disability?”						
Major Occupation Group	2-Digit O*NET Code	Yes	No	Did not answer or return form	Total Number of Individuals Responding ‘Yes’ or ‘No’	Proportion of persons responding ‘yes’ to the total number of individuals that responded either ‘yes’ or ‘no’ (expressed as a percentage)
Construction and Extraction	47	13	381	152	394	72.2%



C. Identification of Potential Impediments for Individuals with Disabilities (IWDs)

The Major Occupation Group(s) in our program in **which the percentage of IWDs was less than seven percent** is/are listed in the **first column of Table 10 below**. For these groups, we reviewed our program to identify any impediments to equal opportunity for IWDs, with the results shown in the second column.

TABLE 10 – Impediments to EEO for IWDs

Major Occupation Groups in which the percentage of IWDs was less than 7%	Impediments to EEO for IWDs
Construction and Extraction	1. Other-This is our initial AAP and we are currently at 3% and are working towards a goal 7%. Still need to meet OSHA requirements.
	2.
	3.

SECTION VI – TARGETED OUTREACH, RECRUITMENT, AND RETENTION ACTIVITIES (IF NECESSARY)

PLEASE NOTE: Completion of this section is **mandatory** if you were required to adopt race, sex, or ethnicity goals (under Section IV of this written AAP) or if you found impediments to equal employment opportunity for IWDs (under Section V of this written AAP). Otherwise, completion of this section is purely optional.

In the coming year, we will undertake the outreach, recruitment, and retention activities listed below. These activities are targeted to the race/sex/ethnicity group(s) for which we adopted goals (as shown in **Section IV**) and/or to IWDs (if we found impediments to equal employment opportunity for such individuals, as shown in **Section V**).

1. We will disseminate information to organizations serving each underutilized group regarding the nature of our apprenticeship program, requirements for selection for apprenticeship, availability of apprenticeship opportunities, and our equal opportunity pledge. The Universal Outreach Tool (UOT) can help connect sponsors with local organizations who may be able to assist sponsors in meeting their outreach, recruitment, and retention goals; the UOT may be accessed at: <https://apprenticeshipusa.secure.force.com/eeoresourcetool>.) These organizations and the group(s) that each serve are listed in **Table 11**:

TABLE 11 – Organizations Serving Underutilized Populations

Major Occupation Group	Underutilized Population (i.e., Women, AA, HISP, AS, AIAN, NHPI, IWDs)	Organization(s) serving population to which information will be disseminated
Construction and Extraction	Women	NAWIC, ISDs, Women in our Ads,
Construction and Extraction	African American/Black	ISDs. Black Contractors Association, market in urban area
Construction and Extraction	Asian	ISDs, Asian American Contractors & Professional Assoc



2. We will advertise all openings for apprenticeship opportunities by publishing advertisements in the following media that have wide circulation in our relevant recruitment areas:

Facebook, Indeed, Instagram, LinkedIn, email, retail shops, Associations

3. We will cooperate with the following local school boards and vocational education systems to develop and/or establish relationships with pre-apprenticeship programs targeting students from each underutilized group to prepare them to meet the standards and criteria required to qualify for entry into our apprenticeship programs:

Garland, Grand Prairie, Irving, Forney, Duncanville, Desoto, Lancaster,

4. We will establish linkage agreements or partnerships with the following pre-apprenticeship programs, community-based organizations, advocacy organizations, or other appropriate organizations, in recruiting qualified individuals for apprenticeship:

Goodwill, Job Corps, Workforce Solutions, YouthBuild

5. After every selection cycle for registering apprentices, we will evaluate and document the overall effectiveness of the above-targeted outreach and recruitment activities and refine them as needed.

The documentation of the evaluations of these activities that we conducted since the last review is attached to this written AAP

6. We **will** undertake the following optional activities:

Enlist journeyworkers (i.e., experienced workers) from the underutilized group(s) to assist in implementing our AAP.

Enlist journeyworkers from the underutilized group(s) to mentor apprentices and to assist with our targeted outreach and recruitment activities.

Conduct exit interviews of each apprentice who leaves our apprenticeship program before completion to understand better why he/she left and to help shape retention activities.

SECTION VII – ANNUAL REVIEW OF PERSONNEL PRACTICES

PLEASE NOTE: You should initially complete this section by the second anniversary of your program’s registration with a Registration Agency, and again on an annual basis.

We conduct a thorough, systematic, and comprehensive review at the program, industry and occupation level of our personnel processes related to the administration of the apprenticeship program annually. Such an annual review ensures that the apprenticeship program is operating free from discrimination based on race, color, religion, national origin, sex (including pregnancy, gender identity, and sexual orientation), sexual orientation, age (40 or older),



genetic information, and disability.

Our reviews have included (but may not be limited to): the qualifications for apprenticeship, application and selection procedures, wages, outreach and recruitment activities, advancement opportunities, promotions, work assignments, job performance, rotations among all work processes of the occupation, disciplinary actions, handling of requests for reasonable accommodations, and the program's accessibility to individuals with disabilities (including the use of information and communication technology).

As a result of our most recent annual review, which was conducted on 3/24/1999; 3/11/2005; 11/23/2010; 5/30/2013, we made or will make the modifications to the program listed in **Table 12** below.

TABLE 12 - Modifications of Personnel Practices

Modification of Personnel Practices	Date Made or To Be Made
Other We will ensure our personnel practices are reviewed on an annual basis.	

SECTION VIII - INVITATION TO SELF-IDENTIFY AS AN INDIVIDUAL WITH A DISABILITY

PLEASE NOTE: You should initially complete this section by the second anniversary of your program's registration with a Registration Agency, and again on each occasion that you update your written AAP.

On 7/1/2023, we began inviting all applicants for our program, at the time that they apply or are considered for apprenticeship, to inform us whether they believe that they are IWDs.

We invited our then-current apprentices to self-identify on 7/1/2023.

Since then, we have continued to invite all applicants to self-identify when they apply, and all accepted applicants to self-identify after acceptance into the program but before they begin their apprenticeships.

Every year, we have reminded all current apprentices that they may update their Voluntary Disability Disclosure Form. We sent our most recent reminder on 7/1/2023.

We use the Voluntary Disability Disclosure Form for these self-identification invitations, and keep it separate from the application and the apprentice's program files.

We keep the Voluntary Disability Disclosure Form separate from the application and the apprentice's program files.



SECTION IX – OFFICIAL ADOPTION OF THE WRITTEN AFFIRMATIVE ACTION PLAN

Adoption by the Sponsor

TX014720001-IEC DALLAS adopts this written Affirmative Action Plan on this 18th day of July, 2023.

Signature of Sponsor’s Representative

Typed/Printed Name

Date

Signature of Sponsor’s Representative

Typed/Printed Name

Date

Signature of Sponsor’s Representative

Typed/Printed Name

Date

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