Appendix C

AFFIRMATIVE ACTION PLAN

ADOPTED BY

Northern Nevada Operating Engineers Local 3 JATC
or
Operating Engineers Local #3

RAPIDS PROGRAM ID NUMBER: NV00267002

**DEVELOPED IN COOPERATION WITH
THE NEVADA LABOR COMMMISSIONER, THE NEVADA STATE
APPRENTICESHIP COUNCIL, AND THE U.S. DEPARTMENT OF LABOR**

**AS REQUIRED UNDER TITLE 29, CODE OF FEDERAL REGULATIONS, PART 30 and THE
NEVADA STATE PLAN FOR EQUAL OPPORTUNITY IN APPRENTICESHIP**

SECTION 1 - INTRODUCTION

The sponsor enters this affirmative action plan (AAP) in good faith to promote equality of opportunity in its registered apprenticeship program. If women and/or minorities are underutilized in the apprenticeship program, the sponsor seeks to increase the recruitment of qualified women and/or minorities for possible selection into the apprenticeship program. The sponsor hereby adopts the equal opportunity pledge located in Section II and the AAP.

This AAP is a supplement to the apprenticeship standards. Any changes made by the sponsor to the AAP will become part of this written AAP. All changes to the AAP must be submitted to the Registration Agency for approval.

SECTION 2 - EQUAL OPPORTUNITY PLEDGE – NRS 610.144 and NAC 610.540

The sponsor commits to the following equal opportunity pledge:

"The recruitment, selection, employment and training of apprentices during apprenticeship will be without discrimination because of race, color, religion, sex, sexual orientation, age, disability or national origin. The sponsor will take affirmative action to provide equal opportunity in apprenticeship and will operate the program of apprenticeship as required under Title 29 of the Code of Federal Regulations, Part 30, and all regulations on equal opportunity of employment in the State of Nevada."

SECTION 3 - ANALYSES AND GOALS

To ensure full utilization of minorities and women in the apprenticeship program, the sponsor will conduct analyses to determine whether minorities and/or females are being underutilized and, if they are, will establish appropriate goals for the full utilization of minorities and/or women in apprenticeship. To determine whether underutilization exists, the sponsor will analyze at least the following five factors:

(1) The size of the working age minority and female (minority and nonminority) population in the program sponsor's labor market area.
(2) The size of the minority and female (minority and nonminority) labor force in the program sponsor's labor market area.
(3) The percentage of minority and female (minority and nonminority) participation as apprentices in the particular occupation as compared with the percentage of minorities and women (minority and nonminority) in the labor force in the program sponsor's labor market area.
(4) The percentage of minority and female (minority and nonminority) participation as journeyworkers employed by the employer or employers participating in the program as compared with the percentage of minorities and women (minority and nonminority) in the sponsor's labor market area and the extent to which the sponsor should be expected to correct any deficiencies through the achievement of goals for the selection of apprentices; and

(5) The general availability of minorities and women (minority and nonminority) with present or potential capacity for apprenticeship in the program sponsor's labor market area.

Underutilization exists if there are fewer minorities and/or women in the registered occupation(s) in the sponsor's apprenticeship program than would reasonably be expected in view of all relevant factors. If the sponsor detects underutilization of minorities and/or women in its apprenticeship program in the registered occupation(s), it will establish goals for the selection of minority and/or female applicants. (For further instructions, see the attached affirmative action plan workforce analysis worksheet.) The sponsor will make good-faith efforts to meet its goals.

SECTION 4 - OUTREACH AND POSITIVE RECRUITMENT- 29 CFR § 30.4(c) and NRS 610.144

The sponsor will undertake appropriate outreach and positive recruitment efforts that would reasonably be expected to increase minorities and women's participation in apprenticeship by expanding the opportunities of minorities and women to become eligible for apprenticeship selection. The sponsor will set forth the specific steps it intends to take under each selected effort below. The sponsor will undertake a significant number of activities to enable it to meet its obligations under 29 CFR § 30.4(c) and the Nevada State Plan for EEO.

A. The sponsor will disseminate information concerning the nature of the apprenticeship, requirements for admission to apprenticeship, availability of apprenticeship opportunities, sources of apprenticeship applications, and its equal opportunity policy to the following:

- Registration Agency
- Women's centers
- Local schools
- Employment service offices
- Other outreach programs and community organizations, including those that can effectively reach minorities and women
- Newspapers, including those that are circulated in minority communities and among women
- Social media outlets (Facebook, Twitter, Instagram, LinkedIn, etc.)

1. ☐ Sponsors of programs accepting applications only at specified intervals must disseminate the above information at least 30 days in advance of the earliest date for application at each interval.
2. ☒ Sponsors of programs customarily receiving applications throughout the year must disseminate the above information regularly, not less than semiannually.

B. ☒ The sponsor will participate in annual workshops conducted by employment service agencies for the purpose of familiarizing school, employment service, and other appropriate personnel with the apprenticeship program and current opportunities.

C. ☒ The sponsor will cooperate with local school boards and vocational educational systems to develop programs for preparing students to meet the standards and criteria required to qualify for entry into the apprenticeship program.

D. ☒ The sponsor will communicate its equal opportunity policy internally in such a manner as to foster understanding, acceptance, and support of the policy among the sponsor's various officers, supervisors, employees, and members and to encourage such persons

to take the necessary action to aid in meeting its obligation under 29 CFR § 30 and the Nevada State Plan for EEO.

E. ☒ The sponsor will engage in programs such as outreach for the positive recruitment and preparation of potential applicants for apprenticeships; where appropriate and feasible, such programs will provide for pretesting experience and training. In initiating and conducting these programs, the sponsor may be required to work with other sponsors and appropriate community organizations. The sponsor will also initiate programs to prepare women and encourage women to enter traditionally male programs.

F. ☒ The sponsor will encourage the establishment and utilization of programs of pre-apprenticeship, preparatory occupational training, or others designed to afford related work experience or prepare candidates for apprenticeship. The sponsor will make appropriate provisions in its AAP to assure that those who complete such programs are afforded full and equal opportunity for admission into the apprenticeship program.

G. ☒ The sponsor will utilize journeyworkers to assist in the implementation of its AAP.

H. ☒ The sponsor will grant advance standing or credit based on previously acquired experience, training, skills, or aptitude for all applicants equally.

I. ☒ The sponsor will take other appropriate action to ensure that the recruitment, selection, employment, and training of apprentices during their apprenticeship will be without discrimination because of race, color, religion, national origin, or sex (e.g., general publication of apprenticeship opportunities and advantages in advertisements, industry reports, articles, etc.; use of present minority and women apprentices and journeyworkers as recruiters; career counseling; periodic auditing of AAPs and activities; and development of reasonable procedures to ensure equal employment opportunity, including reporting systems, on-site reviews, and briefing sessions).

For each item checked in Section IV, describe in detail each specific step that the sponsor will undertake to fulfill that outreach and recruitment step:

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(Add pages as necessary)

SECTION 5 - ANNUAL REVIEW OF AFFIRMATIVE ACTION PLAN

The sponsor will make an annual review of its current AAP and its overall effectiveness and will institute any revisions or modifications warranted. The review will analyze the affirmative action steps (independently and collectively) taken by the sponsor to evaluate their effectiveness in ensuring equal opportunity in all aspects of apprenticeship, including recruitment, selection, employment, and training. The sponsor will continually monitor these processes to identify and address any barriers to equal opportunity. This may require that the sponsor identify the need for new affirmative action efforts and/or deletion of ineffective existing activities. All changes to the AAP must be submitted to the Registration Agency for approval.

SECTION 6 - OFFICIAL ADOPTION OF AFFIRMATIVE ACTION PLAN

Northern Nevada Operating Engineers Local #3 JATC hereby officially adopts this Affirmative Action Plan.

Sponsor(s) must designate the appropriate person(s) to sign the standards.

_____ **Date:** 09/23/2022
Signature of Sponsor / JATC *(designee)*

Administrator
Type Name/Title

_____ **Date:** _____
Signature of Sponsor / Employer *(designee)*

_____
Type Name/Title

AFFIRMATIVE ACTION PLAN
WORKFORCE ANALYSIS WORKSHEET

A. SPONSOR INFORMATION

Program Number:	NV00267002	
Name of Sponsor:	Northern Nevada Operating Engineers Local 3 JATC	
Address:	P.O. Box 20962	
City/State/Zip Code:	Reno Nevada 89515	
Contact Person:	Brian Prather	
Phone Number: 775-575-2729		Fax Number: 775-575-2825
E-Mail Address:	NNVJACBPf@aol.com	

B. OCCUPATIONAL INFORMATION

Occupation Title:	Heavy Equipment Operator
RAPIDS Code: 0365	O*NET-SOC Code:
Type of Selection Method Used:	☒ Selection on basis of rank from pool of eligible applicants ☐ Random selection from pool of eligible applicants ☐ Selection from pool of current employees ☐ Alternative selection
Labor Market Area Description:	☐ State ☐ SMA ☒ County

C. LABOR MARKET AREA AND OCCUPATIONAL PARTICIPATION DATA

C.1. Total Labor Force in Labor Market Area*		
	154426	48% of labor force
Number of minorities:	203951	51% of labor force
C.2. Working Age Population in Labor Market Area*		
Number of women:	143158	48% of labor force
Number of minorities:	151730	51% of labor force
C.3. Apprentice Participation in Occupation in National Apprenticeship System*		
Number of women:	73677	9% of apprentices
Number of minorities:	568078	69% of apprentices
C.4. General Availability of Minorities and Women with the Present or Potential Capacity for Apprenticeship in relevant Labor Market Area**		
Number of women:	5551	
Number of minorities:	10120xx	

D. SPONSOR'S WORKFORCE DATA

D.1. Total Number of Journeyworkers Employed	1328	
Number of women:	46	3% of work force
Number of minorities:	240	18% of work force
D.2. Total Percentage of Apprentices or of Applicant Pool (Depending on Selection Method Used)		
Percentage of women apprentices or women in applicant pool:	5	6%
Percentage of minority apprentices or minorities in applicant pool:	23	26%

E. ADDITIONAL RESOURCE DATA FOR CONSIDERATION IN ESTABLISHING GOALS

Industry Source Data	Minority rate of participation	Female rate of participation
E.1. Registered Apprenticeship Partners Information Data System (RAPIDS)	10	6
E.2. EEOC Occupational Employment Data***		

F. DETERMINATION OF UTILIZATION

Analysis	Yes	No
Minority underutilization:		x
Female underutilization:	x	

G. SPONSOR'S GOALS

The program sponsor proposes and agrees to make a good-faith effort to attain the goal of selecting 23 % minorities and/or 4.5 % women during the next EEO review cycle. These goals will not be used to discriminate against any qualified applicant based on race, color, religion, national origin, or sex.

The number of new apprentices to be hired during the next year (or selection period) is estimated to be 25-30.

The undersigned certifies that it is the sponsor's responsibility to complete all the above to the best of their ability and in utilizing the existing labor market area and occupational participation data, sponsor's workforce data, and additional resource data to create the determination of utilization and establish the above sponsor's goals.

Program Sponsor's Signature

Brian Prather
Typed Name

Administrator
Title

9/23/2022
Date Signed

Suggested resources for obtaining labor market information:

* http://bls.gov/

** Program sponsors may use any reasonable method to propose the entries for "The General Availability of Minorities and Women with the Present or Potential Capacity for Apprenticeship," including relying on the data recorded in Section C.1 for "Total Labor Force," C.2 for "Working Age Population," and C.3 for "Apprentice Participation in Occupation."

*** http://www.census.gov/eeo2000/index.html

Instructions for Completing This Worksheet

The purpose of this workforce analysis worksheet is to establish a benchmark against which the demographic composition of the sponsor's apprenticeship program can be compared. The sponsor must separately determine the availability of minorities and women for each occupational title represented by the program. In determining availability, the sponsor must consider, at the very least, the factors identified at 29 CFR § 30.4(e) and the Nevada State Plan for EEO to determine whether barriers to equal employment opportunity may exist within a particular occupational title.

Part A — The sponsor information section will be prepared by the sponsor representative.

Part B — Occupational information must be taken from the registered program standards and must be prepared by the sponsor representative. A workforce analysis worksheet must be completed for each occupational title identified.

Part C — The sponsor must use the most current and discrete statistical data available in determining availability estimates for the labor market area specified in Part B. Census data is one example of an appropriate source of statistical information. Other sources include data from local job service offices and data from colleges and other training institutions.

For the purpose of this section, the term "labor force" is defined to include both those individuals who are employed and those who are unemployed but looking for employment. The term "working age population" means persons ages 16 years and over whether or not they are currently in the labor force or looking for employment.

Part D — The program sponsor must provide current workforce data as described in Part D. If the sponsor utilizes either selection method 29 CFR § 30.5(b)(1) or (2), the data in D.2 must reflect the pool of eligible applicants from which selections are made. If the sponsor utilizes either selection method 29 CFR § 30.5(b)(3) or (4), the data in D.2 must reflect the apprentices currently registered in the program.

Part E — Utilizing the data found in Parts C and D, the sponsor will determine and record whether minorities and/or women are underutilized.

Parts F&G — If the sponsor's analyses determine that minorities and/or women are underutilized, the sponsor, utilizing the resource data found in Parts C and D, will establish goals that are reasonable in consideration of the results that could be expected from its good-faith efforts to make its overall affirmative action program successful.

NORTHERN NEVADA OPERATING ENGINEERS
JOINT APPRENTICESHIP COMMITTEE

Operating Engineers
Local Union No. 3
of the International Union of
Operating Engineers - AFL-CIO

THE NUCLEUS 3 APPRENTICESHIP OF CRAFTSMANSHIP

The Nevada Chapter
of Associated
General Contractors, Inc.

P.O. BOX 20962. RENO, NV 89515 * 775.575.2729 * FAX 775.575.2825

SECTION 4 – OUTREACH AND POSITIVE RECRUITMENT

A. (2) Dissemination of the above information is done by semiannual posting of our Non-Discriminatory Policy in a locally printed newspaper.

B. The Northern Nevada Operating Engineers Local 3 JAC participates annually in activities such as the Reno Labor-Fest and Construction Career day, Miner's Expo among others.

C. The Northern Nevada Operating Engineers Local 3 JAC participates throughout the year in High School Career Fairs in the 13 northern counties of Nevada.

D. All staff participates in the recruitment events that include minorities and women.

E. The Northern Nevada Operating Engineers Local JAC participates in multiple events encouraging youth, minorities, and women to consider a career as an Operating Engineer.

F. Our pre-apprenticeship program includes MSHA training, First Aid Training, classroom training on equipment nomenclature and time on equipment.

G. We encourage Journeyman to reach out in their communities, family members, friends, to share the career opportunities we provide.

H. Apprentices who have prior experience or training can request an advance to the next step. Those requests are reviewed by the Joint Apprenticeship Committee for approval.

I. The selection process for apprenticeship and employment is based on how an individual scores on their entry exam and how they score in their oral interview. Selection for employment starts with the highest scoring individual. This process eliminates the possibility of not giving an individual an equal opportunity based solely on their race, color, religion, national origin, or sex.