

RESEARCH. ENGAGEMENT. SOLUTIONS.



Equal Employment Opportunity / Affirmative Action Plan

Preliminary Documents Tab A

Provided by: Southeast Michigan Community Alliance (SEMCA)
Workforce Intelligence Network (WIN)

Created by: Attorneys of SEMCA WIN

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Apprenticeship Program

Employer Program Agreement

This Apprenticeship Program Agreement ("Agreement") is entered into between the Southeast Michigan Community Alliance, Inc., through its Workforce Intelligence Network business unit (also sometimes known as the SEMCA/WIN Workforce Intelligence Network for Southeast Michigan) ("SEMCA/WIN") with an office located at 25363 Eureka Road, Taylor, MI 48180 and _____ ("Employer"), located at _____ Michigan, _____, for the purpose of obtaining approval for and administration of an Apprenticeship Program ("Program"), for which SEMCA/WIN will act as the sponsor-intermediary. SEMCA/WIN and Employer agree as follows:

1. This Agreement shall become effective as of _____, ___, 202__, and shall continue until September 30, 202__, unless terminated earlier by the Employer. This is a fully voluntary program, and as such, Employer may terminate this Agreement at any time for any reason with written notice via email. Employer agrees to comply with all requirements documented in the Program Standards and as otherwise set forth in SEMCA/WIN's Guide for Employers and Partners and understands that SEMCA/WIN may terminate this Agreement at any time via email if Employer fails to do so. The terms and conditions in paragraphs 3, 4, 5, 6, 7, 8, and 9 shall survive termination of this Agreement.
2. SEMCA/WIN will provide its services to Employer at no cost, contingent upon the availability of grant funds to SEMCA/WIN. This Agreement is also subject to amendment or termination by SEMCA/WIN at any time via email due to lack of funds or authorization prior to _____.
3. Employer is responsible for providing all wages, benefits, and on-the-job training to its apprentice(s) under the Program, and SEMCA/WIN has no obligation regarding same. Payment for Related Technical Instruction ("RTI") in the Program is incumbent on the Employer and/or apprentice(s) participating in the program. Further, Employer is exclusively responsible for all occupational and safety standards, environmental standards, and other requirements relating to a safe workplace. Employer agrees to provide all Program apprentices with worker's compensation insurance coverage, to the extent required by law, and not seek any contribution for such insurance coverage from SEMCA/WIN, or indemnification, contribution, or damages from SEMCA/WIN for any workplace injury to any apprentice.
4. Employer shall not assign this Agreement, without prior written consent by an authorized employee of SEMCA/WIN. Any attempted assignment without such written consent shall void this Agreement.
5. In all respects concerning this Agreement, SEMCA/WIN shall operate as an independent contractor and not as a joint employer, dual employer, or co-employer of, or with, Employer and/or any apprentices.
6. Employer shall have the exclusive right to review and adjust the on-the-job training and RTI requirements and delivery pursuant to this Agreement but same shall be consistent with the requirements of Program standards. Employer will promptly notify SEMCA/WIN if delivery issues arise or if they are concerns with Program standards. Accordingly, SEMCA/WIN shall not be liable to Employer, its owners, officers, directors, members, employees (including without limitation apprentices), agents, representatives, and/or RTI providers in any manner whatsoever. Employer agrees to hold harmless and indemnify SEMCA/WIN, its local elected officials, area governments, boards, members, officers, directors, employees, agents and/or representatives (collectively, the "Released Parties"), from all causes of action, lawsuits, damages, claims, demands, injuries, costs, attorney's fees, and/or destruction of property arising out of or in connection in any way with the Program (collectively, "Claims") to the full extent permitted by applicable law, except in cases of proven fraud by SEMCA/WIN or its officers, directors or

employees. Applicable law means the law applicable in the State of Michigan, regardless of any conflict of law principles.

7. SEMCA/WIN agrees that all confidential information provided by the Employer, such as any apprentice social security number or any Employer trade secrets, shall be kept confidential and shall not be disclosed outside of SEMCA/WIN except as required for reporting to the U.S. Department of Labor or as otherwise required by law.
8. The terms and conditions of this Agreement may not be added to, deleted from, or changed except in writing, signed by an authorized representative of SEMCA/WIN and by an authorized representative of the Employer.
9. This Agreement shall be construed in accordance with the law applicable in the State of Michigan but shall not be construed against its drafter. If any term or condition of this Agreement is found illegal, invalid, or otherwise inconsistent with such law, a court of competent jurisdiction shall rewrite such term or condition in a lawful manner consistent with the original intent of WIN and the Employer. Further, this Agreement may be signed electronically by one or more parties and such electronic signature(s) are just as binding as actual handwritten signature(s) in ink would be.

SEMCA/WIN

By: _____
Signature

Dated: _____

Print Name

Title

EMPLOYER

By: _____
Signature

Dated: _____

Print Name

Title

The Equal Opportunity Pledge

As required by 29 C.F.R. § 30.3(c)

Employer: This Pledge must appear on your job postings for apprenticeship openings, as well as on the Application for Apprenticeship as required by the U.S. Department of Labor Office of Apprenticeship.

Post this Pledge on apprentice bulletin boards and electronic media as applicable.

[Insert Employer name] (the “Company”) is an equal opportunity employer and will not discriminate on the basis of age, citizenship, color, disability/handicap, gender identity, genetic information, height, marital status, national origin, race, religion, sex (including pregnancy), sexual orientation, veteran status, weight, or any other status or condition protected in accordance with the requirements of applicable law. The Company will take affirmative action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required under Title 29 of the Code of Federal Regulations, Part 30. The Company also provides reasonable accommodation for individuals with disabilities in accordance with applicable law.

This workforce product was funded by a grant awarded by the U.S. Department of Labor’s Employment and Training Administration. It was created for and by the grant recipient and does not necessarily reflect the official position of the U.S. Department of Labor. The Department of Labor makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by the Southeast Michigan Community Alliance Inc. (through its Workforce Intelligence Network business unit) and McShane & Bowie PLC. and is licensed under a Creative Commons Attribution 4.0 International License. 660792.



Appendix C

AFFIRMATIVE ACTION PLAN

ADOPTED BY

Sponsor-Intermediary SEMCA / WIN Workforce Intelligence Network for Southeast Michigan (registered in Michigan as the Workforce Intelligence Network, part of the Southeast Michigan Community Alliance, Inc. ("WIN")), for itself and each of its apprenticeship partners.



25363 Eureka Rd.
Taylor, MI 48180



AS REQUIRED UNDER 29 CODE OF FEDERAL REGULATIONS PART 30

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

Amanda Bauerschmidt, WIN Workforce Project Manager

Date: _____

Michelle Ureste, Sponsor Executive Director

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, WIN, as sponsor and intermediary, adopt this written affirmative action plan ("Written AAP" or "Plan") in good faith to promote equality of opportunity in our registered apprenticeship program and within each apprenticeship program hosted and administered by our employer and recruitment partners. This Written AAP is a part of our apprenticeship Standards. We also reiterate and incorporate the Equal Opportunity Pledge contained in the Standards for this program:

WIN will not discriminate against apprenticeship applicants or apprentices based on race, color, religion, national origin, sex (including pregnancy and gender identity), sexual orientation, genetic information, or because they are an individual with a disability or a person 40 years old or older. WIN will take affirmative action to provide equal opportunity in apprenticeship and will operate the apprenticeship program as required under Title 29 of the Code of Federal Regulations, Part 30.

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 occupational 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: Invitations to self-identify as an individual with a disability;
- Section IX: Official adoption of the Written AAP. This AAP will be updated every time WIN completes the required Workforce Analyses at Sections I through V below. 29 C.F.R. Part 30.4(e)

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 OCCUPATIONAL 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/registered-apprenticeship>. Sponsors that are not required to use RAPIDS to manage their apprentices are encouraged to work with the appropriate State Apprenticeship Agency to complete their workforce analysis.

The following terms are used in this section:

- An **Occupational Title** is a specific occupation that has been assigned an 8-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 (8-digit SOC/O*NET Code: 47-2181.00), Electrician (SOC/O*NET Code 47-2111.00), Tool and Die Maker (8-digit SOC/O*NET Code: 51-4111.00), and Machinist (8-digit 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 8-digit 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 Code: 47) and Manufacturing (2-digit SOC 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 State Apprenticeship Agency to complete their workforce analysis.

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

NOTE: The workforce analyses by occupational 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 **Occupational 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 – Occupational Titles by Sex

Number of Responses Selecting a Sex				
Occupational Title	8-Digit O*NET Code	Female	Male	Total

TABLE 2 – Occupational Titles by Ethnicity

Number of Responses Selecting an Ethnicity

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.



Occupational Title	8-Digit O*NET Code	Hisp	Non-Hisp	Total

TABLE 3 – Occupational 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.

EXAMPLE: *The sponsor of an apprenticeship program for the occupation of Lodging Manager obtained responses from 18 apprentices who identified their racial characteristics. Of these 18 individuals, 2 identified as AS only, 1 identified as both AS and AA, 4 identified as AA only, 1 identified as both AA and White, 1 identified as AIAN only, 0 identified as NHPI, and 9 identified as White only. While the number of respondents is 18, a total figure of 20 should nevertheless be entered in the “Total” responses column due to the selection by some apprentices of more than one race.*

Number of Responses Selecting One (or More) Race							
Occupational Title	8-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total
Lodging Managers	11-9081.00	3	6	1	0	10	20

Number of Responses Selecting One (or More) Race							
Occupational Title	8-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total

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

Major Occupation Group	2-Digit O*NET Code	Number of Responses Selecting a Sex			Female Percent of Total Responses
		Female	Male	Total	

TABLE 5 – Major Occupation Groups by Ethnicity

Major Occupation Group	2-Digit O*NET Code	Number of Responses Selecting an Ethnicity			Hispanic Percent of Total Responses
		Hispanic	Non-Hispanic	Total	



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.

EXAMPLE: *Using the example above for Table 3, the program sponsor obtained responses from 18 apprentices who identified their racial characteristic. Of these 18 individuals, 2 identified as AS only, 1 identified as both AS and AA, 4 identified as AA only, 1 identified as both AA and White, 1 identified as AIAN only, 0 identified as NHPI, and 9 identified as White only. While the number of respondents is 18, a total figure of 20 should nevertheless be entered in the “Total” responses column due to the selection by some apprentices of more than one race.*

Accordingly, to compute the percentage of total responses within a racial category, the sponsor would compare the number of responses selecting a particular race to the total number of responses (20). For instance, in the sample table below, the AS percentage is determined by calculating the proportion of AS responses (3) to the total number of responses (20), resulting in a figure of 15%.

*(Please note that the occupational title for “Lodging Managers” that appears in Table 3 above is classified under the “Management Occupations” Major Occupation Group for purposes of this table, with a two-digit SOC/O*NET Code of 11).*

6.1 Number of Responses Selecting One (or More) Race							
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total
Management Occupations	11	3	6	1	0	10	20

6.2 Percent of Total Responses					
Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI
Management Occupations	11	15%	30%	5%	0%



6.1 Number of Responses Selecting One (or More) Race

Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI	White	Total

6.2 Percent of Total Responses

Major Occupation Group	2-Digit O*NET Code	AS	AA	AIAN	NHPI

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

Select the minimum educational attainment qualification required to be eligible to enroll in the Major Occupation Group(s) covered by your apprenticeship program from among the options below.

Choose One:

- Not High School graduate
- High School graduate (including equivalency)
- Some College or Associate's degree
- Bachelor's degree
- Master's degree
- Doctorate or professional degree



NOTE: The options listed immediately above correspond to the educational attainment categories for which the U.S. Government compiles workforce data by race, national origin, and sex. Use the same educational qualifications that are in your Standards; check all levels above that apply.

If additional qualifications, credentials, or skills are required for program enrollment beyond those listed above, list them here (please limit the number of characters to 2,000)

NOTE: These required additional qualifications must already be in the sponsor's Standards; they cannot be added subsequently.

B. Designated Recruitment Area for Apprentices

Select the category below that corresponds to the **relevant recruitment area** for each Major Occupation Group represented in your program.

Choose One:

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. Please provide a brief rationale for selecting this recruitment area:

Enter text here

Other recruitment area or source – a source or geographic area *other* than an External Recruitment Area from which a sponsor seeks (or reasonably could seek) to recruit apprentices (such as from the sponsor's existing workforce). Please describe this source or area and explain your reason(s) for selecting it:

Enter text here



Combination of external recruitment area / other recruitment area or source – If your program typically recruits apprentices from an external recruitment area AND another recruitment area or source (such as from your existing workforce), select this option, explain your reason for selecting it, and provide the estimated percentage of selectees that typically come from each source (e.g., 75% selectees from external recruitment area / 25% selectees from existing workforce):

Enter text here

C. Specifying the External Recruitment Area

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) (**CHECK ONE**):

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

If you checked “political jurisdiction” above, please specify the jurisdiction:

County(ies): _____
 State(s): _____

NOTE: Definitions for these Census Bureau political jurisdiction categories are provided in Attachment 3 of the Reference Guide.

If you instead checked “a specified radius from the sponsor’s program location,” please CHECK ONE of the following distances:

<input type="checkbox"/> 5 miles	<input type="checkbox"/> 25 miles	<input type="checkbox"/> 300 miles
<input type="checkbox"/> 10 miles	<input type="checkbox"/> 50 miles	<input type="checkbox"/> 500 miles
<input type="checkbox"/> 15 miles	<input type="checkbox"/> 100 miles	<input type="checkbox"/> 1000 miles
<input type="checkbox"/> 20 miles	<input type="checkbox"/> 200 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, with assistance from the Registration Agency, 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 will need to contact the Registration Agency to conduct 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”, if utilization is less than 80% of availability, it is considered significantly less);
- Two Standard Deviations Method** (Under the “two standard deviations” method, if utilization is more than two standard deviations less than availability, it is considered

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](#)



significantly less. A standard deviation is a statistical test that predicts the likelihood that an outcome – in this case, the outcome that utilization is less than availability – occurs by chance).

PLEASE NOTE: The “two standard deviations” method may only be used if the program sponsor employs a total of 30 or more apprentices, as measured in Table 1 (Occupational Titles by Sex) of this Appendix C; or

- If you choose a method **OTHER** than the 80% Method or the Two Standard Deviations Method, you must describe it in the space below (please limit the number of characters to 2,000). **Please also note that selection of such an alternative method will disqualify you from utilizing the DAT.**

Enter text here

After completion of the DAT with the Registration Agency, attach the results to this Written AAP (Appendix C). Then proceed to Section IV below.



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

Population Group	Significant Underutilization? (Yes/No) <i>[from the DAT Report]</i>	Goal (%) <i>[at least equal to the corresponding figures in the DAT Report]</i>
Women		
Hisp		
AA		
AS		
AIAN		
NHPI		

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, 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 Occupational Title

Table 8 below shows, for each **Occupational 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 Occupational Title

Number of Individuals Responding to the Question: “Do you have a disability?”					
Occupational Title	8-Digit O*NET Code	Yes	No	Did not answer or return form	Total Number of Individuals Responding ‘Yes’ or ‘No’

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)

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. The following are examples of impediments to achieving equal employment opportunity for apprentices with IWDs, which may be utilized in completing Table 10 below.

- Lack of effective outreach to IWDs
- Inaccessible methods for testing applicants' qualifications or readiness for progression
- Qualifications or other selection mechanisms that disfavor IWDs and are not job related
- Hostile or unwelcoming work environments for IWDs
- Different training opportunities or work assignments for IWDs than for others
- Different pay, disciplinary standards, or other working conditions for IWDs
- Failure to provide reasonable accommodations or information about reasonable accommodations
- Provisions in collective bargaining or employer acceptance agreements
- Other: *(fill in the blank)*



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
	1. 2. 3.
	1. 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



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

(Enter text here. (Please limit the number of characters to 2,000.))

2. 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:

(Enter text here. (Please limit the number of characters to 2,000.))

3. 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:

(Enter text here. (Please limit the number of characters to 2,000.))

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.

[Choose one:]

- The documentation of the evaluations of these activities that we conducted since the last review is attached to this Written AAP; **or**
- We did not select or register any apprentices since the last review.

4. We *[Choose one:]* **will** / **will not** also 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.

- Other:

[Choose as many as applicable, or none.]

Enter text here

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 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, 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: (insert date), we made or will make the modifications to the program listed in **Table 12** below. Examples of modifications that may improve equal employment for apprentices may include, but not limited to:

- Developing, revising, or enhancing training or information sessions on EEO requirements, and providing a nondiscriminatory, welcoming work environment
- Taking appropriate disciplinary actions (up to and including termination) against staff or apprentices who engage in unlawful harassment or otherwise fail to provide equal employment opportunity
- Renegotiating or terminating collective bargaining or employer acceptance agreements to eliminate discriminatory policies or processes or otherwise allow the sponsor to address barriers or impediments to EEO
- Taking steps to ensure that compensation in an occupational group does not vary based on any protected category
- Revising work assignments to ensure that they do not discriminate on the basis of any protected category
- Revising disciplinary standards to ensure that they do not discriminate on the basis of any protected category
- Other provision of reasonable accommodations to IWDs: Fill in the blank

TABLE 12 – Modifications of Personnel Practices

Modification of Personnel Practices	Date Made or To Be Made



SECTION VIII – INVITATIONS 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 (insert date), 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 (insert date).
- 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 (insert date).
- 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.



SECTION IX – OFFICIAL ADOPTION OF WRITTEN AFFIRMATIVE ACTION PLAN

1. Adoption by the Sponsor

(where there is no labor union involvement in the sponsorship of the program)

NAME adopts this written Affirmative Action Plan on this _____ day of _____, 20_____.
_____.

Amanda Bauerschmidt, WIN Workforce Project Manager

Date: _____

Michelle Ureste, Sponsor Executive Director

Date: _____

(insert typed/printed name) _____

2. Adoption by Labor and Management Representatives of the Sponsor (where applicable)

[Complete below ONLY IF there is joint union-management sponsorship of the apprenticeship program, and where separate signatures from labor union and management representatives are required.]

SEMCA/WIN Workforce Intelligence Network for Southeast Michigan, registered in Michigan as the Workforce Intelligence Network, part of the Southeast Michigan Community Alliance, Inc. adopts this written Affirmative Action Plan on this (day) day of (month), 20 (year).

Signature of Management Representative

Signature of Labor Representative

Name: _____

Name: _____

Date: _____

Date: _____

653014 3 Feb. 2021

Outreach Tool

Universal Outreach Tool

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Anti Harassment
Resources

Complaints
Information

Disability Self-
Identification

General Questions,
FAQs

Non-Discriminatory
Selection Procedures

**Outreach &
Recruitment**

Outreach Directory

Outreach Tool

Outreach Tool
Tutorial

Pledge Poster

Protected
Characteristics

Webinars

Apprenticeship program sponsors can use the [Universal Outreach Tool](#) to help expand recruitment to diverse and qualified candidates in their area, while also meeting a key provision of the apprenticeship Equal Employment Opportunity (EEO) regulations.

What is the Universal Outreach Tool?

The [Universal Outreach Tool](#) is a resource to help sponsors find diverse candidates for their apprenticeship programs. The tool includes non-profit, state, local, and community organizations across the country, and sponsors can use the tool to identify organizations in their area that can help them recruit diverse apprentices.



How does the Universal Outreach Tool work?

The [Universal Outreach Tool](#) is a clickable map that allows sponsors to quickly locate organizations in their area.

Watch this [tutorial](#) for a quick explanation of how to use the tool most effectively.

The U.S. Department of Labor Universal Outreach Tool

The Universal Outreach Tool is a resource provided by the U.S. Department of Labor to help sponsors of federally registered apprenticeship programs find diverse candidates in their area, while also meeting a key provision of the apprenticeship Equal Employment Opportunity (EEO) regulations.

The tool is accessed and used online at:

<https://www.dol.gov/agencies/eta/apprenticeship/eeo/recruitment/outreach-tool>

653121

Corporation for a Skilled Workforce Releases "Understanding Your Community: Labor Market and Workforce Development System Data Toolkit"

Release Date

January 11, 2019

Access to accurate, easily shared data is an essential resource that helps local and state workforce development leaders and practitioners better understand local demographic trends, business and talent development needs, and their choices for investing limited government resources in workforce development initiatives and programs. With support from JPMorgan Chase & Co., Corporation for a Skilled Workforce (CSW) has developed [Understanding Your Community: Labor Market and Workforce Development System Data Toolkit](#) for mayors' offices and other workforce development stakeholders to better understand what data and related resources are available to answer questions about local and regional labor markets, existing and emerging talent pipelines, and the workforce development system in their cities and help inform and improve access to critical workforce development resources, programs, and services.

As part of JPMorgan Chase & Co.'s \$150 million commitment to Detroit's economic recovery, CSW conducted research and authored two workforce development system mappings reports, [Detroit's Untapped Talent: Jobs and On-Ramps Needed](#) and [Detroit's Untapped Talent: Partnerships and Pathways to Success](#) along with a [working paper](#). These reports are intended to help identify and align different workforce development efforts and investments across the public, philanthropic, and private-sector. They also provide a snapshot of the mix of funding in the system, the range of organizations providing workforce development programs and services, and industry sector and other partnerships in the region.

To develop this toolkit, CSW built upon the research previously conducted in Detroit, reviewed data collection and reporting efforts across the country, and interviewed stakeholders from other cities for their input on indicators and data relevant to their local workforce development systems. CSW combined the feedback collected with our expertise in collecting these data over our 27-year history to develop a comprehensive

guide. The toolkit provides guidance on how to answer key questions facing communities about their local workforce development system, including parsing analysis across relevant demographics to better identify disparities.

This toolkit also provides a snapshot of the innovative ways other cities and regions around the country are increasing local capacity to access, apply, and share new sources of data and information to inform and support workforce development decision-making. This toolkit is meant to provide a foundation for regions and cities interested in conducting similar workforce development system research and analyses.

To access the toolkit and its strategies for tailoring data collection and related products to your local workforce development system, [please click here](#).

To learn more about similar research and analyses conducted by CSW, including the Detroit Workforce Mapping reports or about the [National Workforce Benchmarking Network](#), the country's largest national dataset of community-based workforce outcomes, housed at CSW, [please click here](#).

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Employment & Training

Administration (ETA)

An agency within the U.S.
Department of Labor

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Washington, DC 20210

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Searchable American Community Survey data of the U.S. Census

at

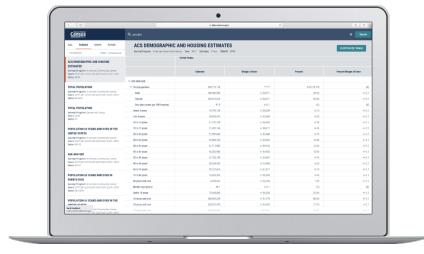
<https://data.census.gov/cedsci/>

Explore Census Data

The Census Bureau is the leading source of quality data about the nation's people and economy.

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Tables

Check out our new table display which allows you to dynamically add geographies, topics, or any applicable filters. You can reorder, pin, and hide columns all with simple drag and drop functionality. Tab through different tables to make sure you found the right one, customize it, and then download multiple vintages of it quickly. If you don't see a functionality you need, find a bug, or have a comment, drop us a line at cedsci.feedback@census.gov.

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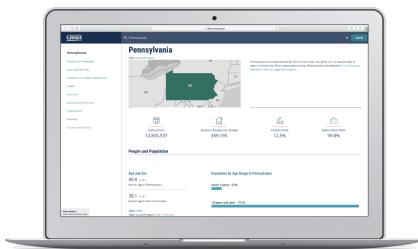
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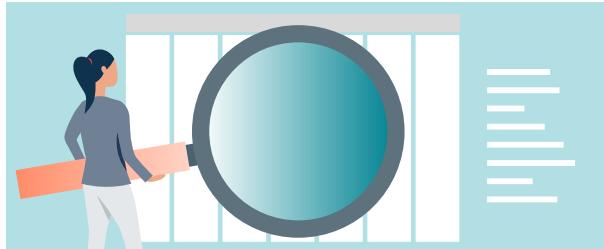
Profiles

Get an overview of your state, county, or place all in one location with our geo-profile pages. They provide high-level statistics about your area regarding people and population, race and ethnicity, families and living arrangements, health, education, business and economy, employment, housing, and income and poverty. Try searching for your hometown to see what data we have, and don't forget to share or embed the maps and charts. If you have an idea on how to make these pages better, find a bug, or have a question, drop us a line at cedsci.feedback@census.gov.

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Microdata



Can't find what you need in the pre-tabulated data tables? For a number of demographic datasets, such as the American Community Survey and the Current Population Survey, public use microdata files are available that allow you to create custom tables.

[EXPLORE MICRODATA](#)

Our Development Depends on Your Feedback

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Measuring America's People, Places and Economy

Requirement	Date(s) Completed	By whom	Where/ Other Notes
Set up and keep current your DOL Apprenticeship Compliance File (5-year retention requirement).			
Post the Equal Opportunity Pledge: <ul style="list-style-type: none"> • All Apprenticeship Program advertising & notices • Workplace bulletin board; • Employee/Apprentice electronic media (if applicable); • Apprentice Handbook (if applicable); • Share with all who work with apprentices. 			
Use the Universal Outreach Tool to recruit apprentices.			
Apprenticeship Applications (even for those not hired) – keep in DOL Apprenticeship Compliance File (5 yrs.).			
Invite Applicants and Apprentices to fill out the Voluntary Identification of Disability form at the following times: <ul style="list-style-type: none"> • With Employment Application; • Again after apprentice is hired but before they start; • Annually after that. • Keep in DOL Apprenticeship Compliance File (5 yrs.). 			
Apprentice Interview and Rating Form and other documents relating to reasons for selection or rejection (even for those not hired) – keep in DOL Apprenticeship Compliance File (5 yrs.).			
Conditional Offer Letter: To apprentice before criminal background check and medical examination. Keep in DOL Apprenticeship Compliance File (5 yrs.).			

Requirement	Date(s) Completed	By whom	Where/ Other Notes
Apprentice Acceptance Letter: To apprentice after passing background check and medical exam. Keep in DOL Apprenticeship Compliance File (5 yrs.).			
WIN Apprentice Agreement – have hired apprentice(s) sign. Please return to WIN.			
DOL Apprentice Agreement – have hired apprentice(s) sign. Please return to WIN.			
Equal Opportunity & Discrimination/ Harassment Prevention Policy <ul style="list-style-type: none"> • Give to each new apprentice and have them sign; and • Recirculate it each year for apprentices' signature with the Voluntary Identification of Disability Form. 			
Training for apprentices and all employees, apprentices, and journey people who work with apprentices.			
Training for managers and supervisors of apprentices.			
Request for Accommodation and Action list – record all apprentice requests for accommodation and action taken. Keep in DOL Apprenticeship Compliance File (5 yrs.).			
Apprentice Exhibit Interview – keep in DOL Apprenticeship Compliance File (5 yrs.)			

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Department of Labor Apprenticeship Compliance File — Contents

As required by 29 C.F.R. §§ 30.11(e) and 30.12

Place the following documents in your DOL Apprenticeship Compliance File (keep for 5 years).

Your apprenticeship sponsor/intermediary SEMCA/WIN will need to keep a duplicate of this file and will check in with you periodically to obtain documents you add from time to time.

This file should contain all records relating to:

- All Voluntary Identification of Disability forms returned to you (including for those not hired)
- Apprentice applications (including for those not hired)
- Interview notes and records (including for those not hired)
- Reasons for acceptance/rejection (including for those not hired)
- Rotation among work processes
- Penalties or discipline
- Compliance with WIN's Affirmative Action Plan
- Any personnel records relevant to Equal Employment Opportunity complaints by apprentices
- Actions to establish and Implement procedures for handling/resolving complaints about harassment / intimidation based on protected traits and complaints about retaliation for engaging in protected activity
- Recruitment and outreach records including your use of the Universal Outreach Tool
- Posting of the EEO Pledge in your workplace and on electronic media as applicable
- Your Employer/Partner Checklist
- Accommodations under the Americans with Disabilities Act (record on the Action Log at Tab D.3 in this Guide).
- All job assignments in all components of the occupation
- Leaves of absence, sick or other leave
- Records required by the Equal Employment Opportunity Commission's Uniform Guidelines on Employee Selection
- Actions to make the workplace and apprenticeship activities accessible to all apprentices regardless of race, color, religion, national origin, sex, sexual orientation, age, genetic info., or disability (separate or single-user restrooms/changing rooms required)
- Hiring, promotion, demotion, transfer, layoff, return after layoff, termination, pay rates, other compensation, work conditions, work hours, hours of training provided

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