Department of Labor Equity Action Plan

Executive Summary

The U.S Department of Labor (DOL) is committed to improving the well-being of underserved, marginalized, and excluded communities, recognizing that by doing so we improve working conditions and economic opportunities for all workers. This document, submitted in response to Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities, summarizes key aspects of DOL's principles and approach to advancing equity.

In subsequent sections, we detail five areas where DOL plans ambitious activity to support underserved communities, including through: (1) enforcement of wage and hour laws; (2) administering and improving the federal-state Unemployment Insurance system; (3) broadening access to DOL programs, services, and information for workers with limited English proficiency; (4) expanding sector-based training and employment strategies; and (5) diversifying the federal workforce by building new pathways into government apprenticeships.

In each area, we identify barriers to more equitable access to programs and services for relevant populations, detail steps to overcoming those barriers, and lay out planned activities and accountability measures. These five areas represent only a portion of the equity work DOL has carried out and is planning to implement over the coming years. But by releasing a roadmap for these five high-impact program areas, we hope to help the communities we serve better understand our vision for advancing equity—so that they can both give us input and hold us accountable for meaningful change.

Mission and Introduction

The U.S. Department of Labor's (DOL, Department) mission is to "foster, promote, and develop the welfare of the wage earners, job seekers, and retirees of the United States; improve working conditions; advance opportunities for profitable employment; and assure work-related benefits and rights." This mission translates into four core functions: (1) worker protection (including protecting workers' wages, health and safety, and retirement savings, as well as the rights of workers on federal contracts); (2) benefits administration (including overseeing the federal-state Unemployment Insurance system and managing the federal workers compensation system); (3) workforce development (including administering the federal workforce system); and (4) development of labor market information (including the production of important statistical series characterizing the workforce and the economy).

The charge we received through Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government complements and reinforces the Department's core functions, which to be effective necessitate close attention to the needs of workers who have faced and continue to face exclusion, marginalization, and discrimination. Realizing the full promise of wage-and-hour laws, for instance, requires assessing whether we are protecting the most vulnerable workers—such as low-paid workers, women of color workers, LGBTQ+ workers, workers with disabilities, veterans, and immigrant workers—who are most likely to experience violations of their rights. In a similar vein, the federal-state Unemployment Insurance system fails to fulfill its objectives when large numbers of workers—especially low-paid workers or workers of color—cannot access adequate benefits in a timely manner.

The need to center underserved populations in the Department's work would be important at any moment, but it is especially urgent as the country grapples with deep social and economic disparities revealed and accelerated by the COVID-19 pandemic, the accompanying economic crisis, and the current economic recovery. Not only were women, workers of color, immigrant workers, low-paid service-sector workers, and other disadvantaged groups hit hardest by illness and death, but they also suffered some of the largest economic damage. New federal actions, bolstered by the passage of the American Rescue Plan and Bipartisan Infrastructure Law, have provided timely and much-needed support to these vulnerable communities and promise new historic investments in the coming years. But more work remains to ensure that the Department fully realizes its mission that *all* working people, jobseekers, and retirees have the economic security, opportunity, and voice they need to thrive in our society.

<u>**Summary of Early Accomplishments**</u>

Over the past year, the Department of Labor has prioritized initiatives to center underserved populations in how we develop and administer programs and policies. Below, we summarize early actions already underway, noting that this list represents a small proportion of the overall work DOL has carried out to support marginalized, vulnerable, and underserved communities.

- **Broadening the equity impacts of DOL grantmaking:** DOL has established Department-wide principles for advancing equity in our grantmaking, for instance, by removing barriers to the participation of small, new, or emerging community-based organizations in the grantmaking process; encouraging grantees to serve hard-to-reach and historically underserved populations; building a pipeline of diverse community-based organizations capable of delivering services to local communities; supporting existing grantees that demonstrate commitments to expanding their own diversity, equity, and inclusion work; and building accountability for equity in grant reporting requirements and associated research and evaluation activities. In support of these principles, the Employment and Training Administration (ETA) has developed a menu of options for DOL program offices to select and customize when developing grantmaking opportunities. These include options such as extending the open period for applications for certain grants, removing requirements that may have hindered grantee diversity in the past, and increasing the points given to grant applications that propose serving areas of greater need. ETA reviewed and revised FY 2021 funding opportunities to incorporate these options. For instance, ETA's community college investments now require colleges to identify and propose plans for addressing and closing key equity gaps.

- **Understanding—and improving—the equity data we collect:** Advancing equity requires data in order to assess the needs of underserved populations, the scope of existing programs, and the impacts of potential interventions. Last year, DOL conducted an inventory of the equity-oriented data collected by agencies to better understand where there are gaps in necessary data and opportunities for addressing those gaps. One issue identified by this inventory involves missing demographic data for program participants, including employment and training programs, which makes it more difficult to assess whether those programs are reaching our nation's workers. ETA thus launched an analysis to better understand the extent of missing demographic data, its impact on interpreting program data, and options for improving data quality. Lessons from this project are being applied to other programs (including new grant initiatives, within the bounds of federal nondiscrimination law), to expand the collection of demographic data and improve its quality, and to strengthen analyses of equitable access to programs and services.

- **Centering vulnerable and underserved communities in the rulemaking process:** As part of the development of DOL's rulemaking agenda, program agencies have prioritized initiatives which are especially important for low-paid workers, workers of color, and other traditionally underserved communities. For instance, the Occupational Safety and Health Administration (OSHA) issued rules requiring employers to provide time off for vaccination and recovery to remove obstacles to this life-saving protection for low-paid workers in underserved communities. Additionally, OSHA has launched an enforcement initiative on heat-related work hazards, which pose increasing risk to many workers as climate change continues. OSHA also began its rulemaking process around a workplace standard governing hazardous heat conditions, publishing an Advance Notice of Proposed Rulemaking and seeking diverse stakeholder input. The Wage and Hour Division (WHD), for its part, has engaged in rulemaking for tipped workers. Tipped workers are disproportionately people of color and most are women. They suffer a poverty rate over twice that of non-tipped workers. The rule helps ensure tipped workers are treated with dignity and respect and that they receive the appropriate wage for the work they are performing.

- **Building stronger partnerships with community-based organizations:** Another cross-cutting approach DOL is taking to advance equity is forging stronger partnerships with community-based organizations that have trusted relationships and reach into traditionally underserved populations. These partnerships can help workers better understand their workplace rights and expand access to employment and training-related benefits and services. These partnerships can also help DOL better understand the needs faced by specific communities. For instance, the Veterans' Employment and Training Service (VETS) launched an engagement initiative with Historically Black Colleges and Universities (HBCUs) to help connect service members and veterans with employment supports, spread awareness of VETS' work, and better understand the needs of underserved communities of color and their intersection with service members and veterans. For its part, the Office of Disability Employment Policy (ODEP) has launched several national online dialogues to solicit broad stakeholder input on the effectiveness of employment programs and services for people from underrepresented groups within the disability community. ODEP has also entered in a formal alliance with the American Association for Access, Equity, and Diversity, which includes a range of collaborative activities to advance inclusion of people with disabilities into the workforce. OSHA is also expanding its own alliance program to develop more voluntary, collaborative relationships with stakeholders, especially those that can reach vulnerable worker populations.

- **Establishing equity focused Agency Priority Goals (APGs):** APGs are two-year goals that provide agencies a mechanism to focus leadership priorities, set outcomes, and measure results, bringing attention to mission areas where agencies need to drive

significant progress and change. To highlight the importance of this initiative, DOL has established an APG, An Economy for all Workers or "Equity APG", which encompasses the equity initiatives of twelve DOL sub agencies. Equity is also a core component of the Department's other two APGs: Strengthening America's Safety Net for Workers or "UI APG" and Making Safe, Healthful, Fair-Paying and Equitable Workplaces a Priority or "Worker Protection APG." These APGs prioritize the advancement of racial equity, diversity, and inclusion, to better support underserved communities, and to hold the Department accountable to this goal.

Equity Action Plan for Protection of Workers' Wage and Hour Rights

The Department of Labor's Wage and Hour Division (WHD) aims to serve low-paid workers and ensure that they are receiving all the wages they have earned. WHD cannot advance this mission without addressing the impact of systemic inequities on its policies and programs. Indeed, ongoing research suggests that economically marginalized and underserved workers tend to be most vulnerable to wage and hour violations. Data from the Current Population Survey, for instance, indicates that non-citizen workers, Hispanic workers, women workers, and Black workers are especially likely to experience minimum wage violations—that is, failure to receive earnings from their employers to which workers are legally entitled. The pandemic, moreover, highlighted poor compensation and working conditions faced by many of these workers in essential occupations and sectors who kept the country moving forward during the COVID-19 pandemic.

- Barriers to Equitable Outcomes
    - Concentration of underserved workers, especially workers of color, immigrant workers, workers with disabilities, women, and workers with low levels of formal education, in occupations and sectors especially prone to wage and hour violations
    - Lack of structures for communicating to workers about their workplace rights and access and availability of channels for complaints
    - Worker fear of reporting potential violations due to employer retaliation, especially retaliation related to perceived immigration status
    - Limited enforcement resources relative to the scale of the workforce served, with approximately one WHD investigator for every 190,000 workers

- Intended Impact on Barriers to Equity
    - Target WHD initiatives to sectors disproportionately employing low-paid, essential workers most likely to experience wage and hour violations and where WHD actions will amplify effects on employer practices
    - Improve workers' awareness of rights and knowledge of how to file complaints, especially by targeting education and training campaigns to sectors and regions most likely to have large proportions of vulnerable, low-paid workers and by working through trusted channels of communication, like community-based organizations
    - Maximize WHD capacity to identify and address retaliation against workers who attempt to exercise their workplace rights, especially immigration-based retaliation
    - Develop and leverage strategic partnerships and memorandums of understanding (MOUs) with other entities, including state and local governments and other federal agencies, to yield the greatest possible protections for low-paid, vulnerable workers

- Action, Tracking Progress, and Accountability
    - Maximize Strategic Partnerships with State and Local Governments Informed by a Sector and Place-Based Enforcement Analysis

- WHD has historically focused enforcement on industries that employ some of the lowest-paid workers with the highest rates of wage violations; in addition, WHD will conduct a new enforcement analysis to understand comparative labor standards offered by relevant worker protection laws, including the scope of worker protections, the enforcement capacity of state and local partners, and available remedies across the country
- This enforcement analysis will answer the question, for each U.S. region and industrial sector, what are the different sources of protection that workers can expect to receive from different levels of government and community partners?
- The results of this enforcement analysis will inform the development of strategic partnerships and MOUs to ensure that workers are receiving the greatest possible protections through all tools available in particular regions and sectors of the country
- WHD will focus on ensuring that offices have the training, tools, and resources needed to unleash the power of partnerships with state and local governments, make MOUs more than commitments on paper, and ensure that MOUs are aligned with the enforcement analysis described above.
- These activities will be tracked as part of WHD's agency management plan, and the Department will also be held accountable through its continuing engagement with state and local governments and community and worker organizations

o Reaffirm WHD's Commitment to Preventing and Addressing Retaliation
- All WHD field staff will receive training to identify and address workplace retaliation, particularly immigration-based retaliation and the retaliation and exploitation of vulnerable workers, under the acts enforced by WHD; these trainings will also help investigators to identify more subtle or novel forms of retaliation based on fact patterns that are raised by worker or community stakeholders regularly interacting with vulnerable workers
- This activity will be tracked as part of WHD's agency management plan, and the Department will also be held accountable through its continuing engagement with state and local governments and community and worker organizations participating in strategic partnerships
    - WHD will track as a performance milestone the launch of an agency-wide training initiative focused on retaliation and workplace crimes

o Continue Conducting Equity-Focused Outreach to Essential Workers
- WHD will continue to develop and disseminate worker-focused information and resources to educate workers and raise public awareness of workers' rights, including through posters, audio public service announcements, digital advertising banners, webinars, and educational workshops
- WHD will launch and track a media and outreach campaign focusing on economically marginalized communities and make materials available in multiple languages

- Regional and local WHD offices will receive training on hosting effective listening sessions, including barriers faced by underserved communities when working with WHD, misclassification of workers as independent contractors when they should be classified as employees, and retaliation, among other topics
- Information gathered during listening sessions will be incorporated into future policies and practices; worker impact stories will be collected for analysis and incorporated in future outreach events
- This activity will be tracked as part of WHD's agency management plan, and the Department will also be held accountable through its continuing engagement with state and local governments and community and worker organizations participating in strategic partnerships

o Develop Strategic Partnerships with Community-Based Organizations, Worker Centers, Unions, and Industry Associations
- Many local and regional offices have spent years developing and maintaining meaningful strategic partnerships with community-based organizations, worker centers, unions, industry associations, consulates, faith-based organizations, and worker advocacy groups; many of these organizations work closely with vulnerable communities, including vulnerable communities of color, and are trusted by workers
- WHD will empower each level of the agency—local, regional, and national—to maximize the full potential of these strategic partnerships by providing training, resources, and guidance to ensure meaningful relationships that can impact these communities
- This activity will be tracked as part of WHD's agency management plan, and the Department will also be held accountable through its continuing engagement with state and local governments and community and worker organizations participating in strategic partnerships

Equity Action Plan for Unemployment Insurance

The federal-state Unemployment Insurance (UI) system offers crucial income replacement to workers who have lost a job for good cause or through no fault of their own, as well as macroeconomic support for the overall economy during downturns. During the pandemic, UI benefits helped over 53 million workers and put some $800 billion into the economy.

Despite its important relief and stimulative effects, UI's reach across jobless workers remains uneven. While different data sources sometimes point in different directions, the overall picture is that the current system of unemployment insurance—both before and during the pandemic—provides unequal access to benefits for marginalized communities, including racial and ethnic minorities, low-paid and part-time workers, workers with limited English proficiency, and workers with lower levels of formal education. For instance, pre-pandemic, unemployed Black workers were 21% less likely to receive benefits than white workers, according to the 2018 Current Population Survey UI Non-Filers Supplement. The gap by education was even larger: 30% of jobless workers with at least a college degree reported receiving benefits in 2018, compared to just 11% of workers with less than a high school degree.

In light of these equity gaps, the Department of Labor is engaged in a comprehensive effort to improve timely access to benefits for eligible workers, above all for workers historically underserved by the UI system.

- Barriers to Equitable Outcomes (Depending on State Given Federal-State Structure of Program)
  - Lack of structures for communicating with workers about their eligibility for benefits, the application process, and how to fulfill requirements for continuing to receive benefits (like ongoing certification of work search effort)
  - Cumbersome application and ongoing certification processes impose barriers on underserved communities, including individuals with limited internet access, limited English proficiency, disabilities, and low trust in government
  - Large backlogs of claims may have a disparate impact on individuals with historical barriers to access
  - Fraud and identity verification detection methods may deter or disproportionately flag as ineligible underserved workers, especially workers of color or individuals who have changed names or genders
  - Lack of disaggregated data on program access by demographic characteristics prevents regular equity tracking that could promote accountability and inform changes to program laws and administration

- Intended Impact on Barriers to Equity
  - Promote greater worker awareness and knowledge about the program, including by conducting more outreach, training, education, and assistance
  - Piloting efforts to streamline benefits application and certification, including by using more plain language in program communications, reengineering benefits

<mark>application, eligibility determinations, and ongoing certification processes to be faster and less burdensome on workers</mark>

- o Reducing backlogs that have disparate impacts on underserved communities, including through process engineering and supporting new hires
- o Revise fraud detection tools to ensure that screening methods do not have disparate impacts on underserved communities, while still effectively combatting fraud
- o <mark>Create new indicators of program access and barriers to identify equity gaps using UI program data, including key measures like application, recipiency, denial, and timeliness rates broken out by demographic groups (especially race, ethnicity, education, age, gender, disability status, geographic area, and language proficiency)</mark>

- Action, Tracking Progress, and Accountability
  - o Tiger Team Initiative
    - ▪ Multi-disciplined "Tiger Teams" are being sent to individual states to identify technological, operational, and administrative short-term solutions in the areas of equitable access, timeliness, and fraud reduction
    - ▪ Participating states will demonstrate gains in equity of recipiency and develop baseline measurements for the timeliness of benefits across racial demographics, and other attributes of underserved communities
  - o Equity Grants to States (through Unemployment Insurance Program Letter No. 23-21)
    - ▪ This funding opportunity provides up to $260 million in grants to states to promote equitable access to UI programs, including by eliminating administrative barriers to benefits applications, reducing state workload backlogs, improving the timeliness of payments to eligible individuals, and ensuring equity in fraud prevention, detection, and recovery activities
    - ▪ States submitted applications by the end of calendar year 2021; as part of their grant applications, states identified specific outcome measures tied to their proposed equity-related activities
    - ▪ These outcome measures will be used to track the impact of their efforts; for instance, if grant funds were used to modify IT systems to allow individuals with two-letter last names or two-word last names to successfully submit an initial claim electronically, the state might measure first payment timeliness for those groups of claimants
    - ▪ Equity grantee performance will be tracked as part of the Department's strategic plan; in addition, the Department will track state and claimant feedback on this initiative through ongoing engagements with state UI agencies and claimant groups
  - o Pilot Navigator Grants to States (through forthcoming Unemployment Insurance Program Letter)
    - ▪ This funding opportunity provides up to $15 million in grants to states to create navigator programs—partnerships between state UI agencies and community-based organizations—to help underserved workers learn about, apply for, and if eligible, receive UI benefits

- - Selected states will partner with community-based organizations with documented experience working with underserved workers on activities that may include outreach, training UI agency staff, education, and general assistance with completing applications for UI benefits
    - Community-based organizations participating as navigators will also regularly report on barriers experienced by the populations they are serving to state agencies and DOL; these organizations will then work with state UI agencies to collaboratively address identified barriers
    - The Department will help states and community-based organizations better target their efforts by sharing equity indicators that can inform outreach, education, training, and assistance activities
    - As a condition of receiving the grant, states and community navigators will participate in an evaluation conducted by the Department of Labor to identify promising practices and scalable approaches for future navigator initiatives
    - Navigator grantee performance will be tracked as part of the Department's strategic plan; in addition, the Department will convene a learning community between navigator grantees to share best practices, common obstacles, and lessons learned across states
    - Lastly, the Department will track state and claimant feedback on this initiative through ongoing engagements with state UI agencies and claimant groups
  - Elizabeth Brandeis UI Equity Research to Action Center
    - The Department of Labor's Chief Evaluation Office is launching a grant competition for an academic institution (or network of institutions) to create a new center to conduct and disseminate research related to the UI system, with a cross-cutting focus on equity in program administration and outcomes
    - The research center will support training and teaching, data collection, research and evaluation, and outreach and education to researchers, practitioners, program administrators, policymakers, and the general public
    - An important priority for the research center's work is recruiting, retaining, and training diverse students, scholars, and researchers, especially scholars and students who are affiliated with institutions that have not had the capacity to mentor students or conduct research on the UI program in the past
    - Another important priority for the research center's work involves partnership-building—including with state UI agencies, community and worker organizations, and the Department of Labor—to make the evidence that the research center generates actionable; this includes providing expertise to DOL and state UI agencies on research and evaluations, public programming, events, and trainings, and fellowship programs to bring researchers into government, for instance, to DOL through Intergovernmental Personnel Act assignments

- o Equity Data Partnerships with States
  - The Department of Labor's Chief Evaluation Office is initiating a series of pilot data partnerships with state UI agencies to receive state UI records and produce, for the first time, disaggregated federal indicators of access to UI benefits by demographic groups
  - These partnerships will produce indicators of application, recipiency, denial, and timeliness by demographic groups and across regions within a state that state UI agencies can use to inform changes to program administration to improve equity for underserved populations, including through new outreach, education, and training
  - States can use funds from the Equity Grants described above for these partnerships
  - The Department is currently moving ahead with partnerships in five states, and plans to release initial results for these states by summer 2022
  - The Department will recruit more states throughout 2022 and 2023, and will also produce broader lessons learned from these partnerships that will be applied to ongoing UI modernization efforts
  - Equity data partnership progress will be tracked as part of the Department's strategic plan; in addition, the Department will convene a learning community between equity data partners to share best practices, common obstacles, and lessons learned across states
  - The Department will track state and claimant feedback on this initiative through ongoing engagements with state UI agencies and claimant groups

Equity Action Plan for Improving Language Access

Carrying out the mission of the Department of Labor requires reaching all segments of the population, including those individuals with limited English proficiency (LEP). According to the latest data available from the American Community Survey, in 2019 8.5% of the labor force reported limited English proficiency, totaling over 14 million workers. Data suggest that LEP workers are disproportionately likely to experience workplace violations, like wage theft, and during the COVID-19 pandemic language barriers posed significant risks to LEP workers who were unable to receive important health and safety information from employers or government agencies. The Department is committed to ensuring that all workers, including LEP workers, are fully aware of their rights, knowledgeable about the process for exercising their rights in the event of a potential violation, and able to report any suspected violations to appropriate authorities without fear of retaliation. Language access barriers prevent LEP workers from fully participating in programs and activities, and receiving important services provided by DOL.

- Barriers to Equitable Outcomes
  - Translation and language access activities are frequently decentralized across each of the Department's agencies, with each agency being responsible for identifying and funding the language access needs of the populations they serve
  - As a result of this decentralization, agency compliance with language access requirements has been inconsistent and, at times, runs the risk of being insufficient to fulfill the Department's interests and responsibilities of reaching all workers, and especially vulnerable workers

- Intended Impact on Barriers to Equity
  - Improved understanding of the language needs of the populations we serve across all Departmental agencies
  - Increasing internal DOL language capacity through hiring and retaining more bilingual and multilingual staff
  - Development of centralized resources for Departmental agencies to use to meet needs for individual programs and populations served
  - More Departmental information resources and interactions available in the languages used by populations served

- Action, Tracking Progress, and Accountability
  - Agency-Specific Language Access Initiatives
    - Individual agencies, including the Occupational Safety and Health Administration (OSHA) and the Mine Safety and Health Administration (MSHA), are planning efforts to reach LEP workers in the populations that these agencies currently serve over the next year

- OSHA's Susan Harwood Training Grant Program funds hazard recognition and prevention training in hard-to-reach and diverse communities of at-risk workers; OSHA is planning to expand and track the number of Harwood grant applicants proposing to deliver or develop materials for training in languages other than English to broaden the reach of this important program to more non-English language speaking communities that may be at risk for workplace safety and health dangers
- MSHA is planning several initiatives to expand its reach to Spanish language-speaking populations, including by recruiting for new bilingual positions in regions where there is a mining community that is predominantly Spanish-speaking, developing more bilingual signs to inform mine workers of health and safety risks in languages they can read and understand, and introducing new bilingual training assistance, including for mine operators and contractors, to ensure that health and safety training initiatives reach all mine workers
- These activities will be tracked through OSHA and MSHA's agency management plans
  - OSHA will track as a performance measure the percentage of Harwood grant applicants proposing to deliver or develop materials for training in languages other than English
  - In addition, MSHA will track as a performance milestone when half of all MSHA signs are available in Spanish
- o Greater Department-wide Language Access Planning
  - The Department is requesting funds to support a centralized team, staffed at both the national and regional levels by the Civil Rights Center and the Office of Public Affairs, to develop greater consistency in the delivery of language access services across all Department agencies and programs
  - This centralized language access team would also develop and provide training to DOL employees on language access policies and procedures, oversee the ongoing translation of vital information on DOL's website, and ensure the Department's digital communications are reaching LEP communities
  - The centralized language access team would use existing data along with new surveys of Departmental agency staff to better understand language needs for common material (such as the Department's website) as well as the language needs of local and regional service populations, providing support at both the national and regional/local levels
  - If funded, this team would track its activities through new performance indicators in the Department's management plan

Equity Action Plan for Workforce Training

The mission of the public workforce system is to develop the welfare of job seekers by improving their working conditions and advancing opportunities for profitable employment. To accomplish this goal and foster equity, the Department must center historically marginalized and underserved workers and job seekers. Prior to the COVID-19 pandemic, for example, the Bureau of Labor Statistics reported that the unemployment rate for Black workers was 6.1% compared to 3.3% for white workers. These disparities have persisted through the pandemic and the recovery; as of November 2021, Black workers are 65% more likely to be unemployed than their white counterparts.

In order to realize its mission, the Department must intensify its focus on workers who have been and continue to be marginalized in the public workforce system and the labor market.

- Barriers to Equitable Outcomes
    - Outreach efforts are necessary to understand the unique challenges faced by members of underserved communities in accessing ETA programs, services, and benefits, and to achieve equitable outcomes
    - Missing data and incomplete demographic data creates challenges in assessing the equity of access to services and outcomes within workforce programs; deeper analysis into workforce performance data is required to identify programmatic barriers to marginalized job seekers and set accountability goals
    - Current discretionary grant policies and processes may limit the ability of smaller diverse organizations to access federal workforce funding; these organizations, often based locally in underserved communities, may be particularly well positioned to address the regional training, education, and labor market barriers of job seekers
    - Specific populations, like individuals who were formerly incarcerated and at-risk youth, may require additional support and programs to address their unique challenges
    - Workforce development training and services that do not lead to actual job placements or that result in low quality employment, particularly for workers from underserved communities

- Intended Goals to Address Barriers to Equity
    - Identify programmatic barriers, through workforce system data analysis, that prevent underserved populations from receiving full and equitable access to workforce services and establish performance measures to drive accountability
    - Establish and maintain strong relationships with stakeholders representing underserved communities to better understand and address the needs of the community
    - Leverage stakeholder feedback and data analytics to identify barriers in the equitable distribution of discretionary grant funding and create performance measures to incentivize behaviors that will advance equity goals

o Develop and continue to invest in programs and services that mitigate the challenges faced by underserved communities with specific needs and expand diversity within Registered Apprenticeships

o Invest in industry and sector-based high road training partnerships that focus on equity and job quality, bringing together workers, labor and other worker organizations, employers, and training entities to jointly develop workforce development solutions with pathways to quality jobs especially for vulnerable workers

- Action, Tracking Progress, and Accountability
  o Leverage and Expand Public Workforce System Data to Identify and Address Barriers to Underserved Populations
    ▪ Accurate and complete data are critical to understanding the degree to which employment and training services are administered equitably; ETA plans to undertake a number of actions to assess the adequacy and limitations of its demographic program data, mitigate challenges presented by incomplete data where feasible, and take steps to improve the quality and scope of data collections including data disaggregation
    ▪ ETA will identify data collection techniques and features of program administration that are associated with high or low demographic response rates, develop recommendations for future information collections, and provide technical assistance to states to improve demographic data quality
    ▪ ETA plans to expand the scope of apprenticeship data collected in the Registered Apprenticeship Partners Information Management Data System (RAPIDS) to cover all states to support comprehensive demographic analyses of the Registered Apprenticeship system
    ▪ ETA plans to analyze participant outcomes and access to services segmented by salient demographic variables for key ETA programs; the results of this analysis, along with qualitative analysis and other evidence, will inform the development of equity-related strategies, activities, and performance metrics in FY23
    ▪ ETA will be held accountable for the completion of these activities through milestones tracked in the agency management plan
  o Engage with Stakeholders to Identify Barriers to Equity in ETA Administered Services, Programs, and Benefits
    ▪ ETA will engage with stakeholders that represent underserved communities to identify equity barriers in employment and training services for individuals and to discuss potential barriers and solutions for organizations seeking grants
    ▪ ETA will use the information gathered through stakeholder outreach to work with existing grantees to improve access to services in structurally disadvantaged communities
    ▪ ETA will work closely with the Diversity and Inclusion Registered Apprenticeship Technical Assistance (RA-TA) Center of Excellence to

ensure that it is successful in providing technical assistance to employers and industries in order to expand opportunities in Registered Apprenticeship to underserved populations

- ETA will also work with DOL leadership to support the Advisory Committee on Apprenticeship (ACA) which includes a diverse set of stakeholders from across the nation, reflective of communities, including those communities most affected by poverty, to build a Registered Apprenticeship Program (RAP) that works in all communities
- ETA will be held accountable for the completion of these activities through milestones tracked in the agency management plan

o Foster Equity in Discretionary Grantmaking
- ETA and VETS will conduct an equity assessment to identify and address barriers that prevent organizations representing underserved communities from receiving discretionary grant funding; this includes a review of the discretionary grantmaking process, including conducting analysis on grantees, participants served, and associated outcomes to identify opportunities to advance equity goals and develop performance measures and milestones to drive accountability in FY23
- ETA and VETS will assess the developmental phase in grantmaking to identify opportunities for pre-notices, stakeholder engagements, and other tools to increase feedback opportunities for stakeholders, test and assess the feasibility of the proposed approaches as well as an extended application period
- In order to identify and eliminate outdated and unnecessary requirements and inform planning and procedures for the FY 2023 grant year, ETA and VETS will conduct a retrospective review of FY 2022 grants and program designs and issue new guidelines as appropriate
- ETA and VETS will be held accountable for the completion of these activities through milestones tracked in agency management plans

o Pilot Programs and Services, Issue Grants, and Provide Technical Assistance (TA) to Mitigate Deep Barriers Faced by Specific Populations
- ETA will continue to invest in employment and training services for those most affected by the COVID-19 pandemic, including historically marginalized groups such as women, people of color, immigrants, youth, persons with disabilities, and justice-impacted individuals, among others by providing TA on evidence-based strategies to improve employment outcomes for program participants
- As part of a White House-led effort to incorporate Community Violence Intervention (CVI) strategies, ETA will inform, support, and fund workforce system practitioners to participate in CVI; in addition to issuing guidance to grantees and leading cross-agency guidance for community-wide impact, ETA will award Reentry Employment Opportunities (REO) youth grants that focus on CVI strategies and best practices for serving populations that have higher incidents of poverty and homelessness

- ETA will continue testing and evaluating pre-release services for incarcerated individuals, through a third round of the Pathways Home grants in FY 2022
- ETA will continue administering the WIOA Indian and Native American Program (INAP) and publish a funding opportunity to award INAP grants; ETA plans to continue engaging with the Native American Employment and Training Council and to consider their recommendations on INAP program administration
- ETA will continue to implement State Apprenticeship Expansion, Equity, and Innovation (SAEEI) grants that bolster states' efforts to expand programming and recruitment strategies to attract a diverse workforce
- ETA will be held accountable for the completion of these activities through milestones tracked in the agency management plan

o Establish and Invest in Industry and Sector-based High Road Training Partnerships (HRTPs) that Build Pathways to Quality Jobs for Vulnerable Workers.
- ETA will invest in high road training partnerships (HRTPs) that bring together workers, labor and other worker organizations, employers, and training providers to collaborate in developing industry and sector-based workforce solutions that focus on equity and job quality
- By establishing a framework in which industry leaders (workers, labor, and employers) and training entities partner to address industry and workforce needs in real-time, HRTPs provide marginalized workers with pathways to quality jobs (including actual employment in good jobs), while employers benefit from a skilled workforce and increased market competitiveness
- ETA will consider how to integrate the HRTP approach into existing discretionary grants to promote economic mobility and equitable access to good jobs for underserved and marginalized workers

Equity Action Plan for Government Apprenticeships

Advancing equity requires a qualified and diverse Federal Government workforce that is representative of the communities that it serves. One way to advance this goal is through developing Government Apprenticeships that can provide new pathways to federal service for job applicants and help close the gap for the demand for skilled workers.

- Barriers to Equitable Outcomes
    - Existing hiring practices and pre-qualifications may inadvertently dissuade or exclude otherwise talented and diverse candidates from accessing employment apprenticeship opportunities in the Federal Government
    - Recruitment geography for most Federal Government jobs is often limited to larger, high-cost metropolitan areas (*e.g.*, San Francisco, CA; Washington, D.C.; Boston, Massachusetts) which may be a deterrent for talented individuals unable or unwilling to relocate away from their families and communities
    - Lack of support for relocation and completion of apprenticeship programs (*e.g.*, transportation, flexible timing, access to childcare, and support for additional education, training, and pre-apprenticeship opportunities)

- Intended Impact on Barriers to Equity
    - Provide new pathways for diverse candidates to find employment in the Federal Government through developing a framework for Public Service/Federal Government Registered Apprenticeships that other program offices or agencies can implement
    - Expand the recruitment pool by leveraging Historically Black Colleges and Universities (HCBUs), other educational institutions serving diverse populations, national advocacy organizations, and other local community partners that can help promote on-ramps to Registered Apprenticeship opportunities; evaluating eligibility for supports for unemployed, underemployed, underrepresented individuals, as well as communities that have been adversely impacted by the pandemic to align with the President's diversity and reemployment goals
    - Provide support, including mentors/coaches or other supportive services, needed to persist, succeed, and complete an apprenticeship program

- Action, Tracking Progress, and Accountability
    - Conduct Stakeholder Outreach to Government Agencies
        - Host listening sessions with existing federal agencies that sponsor existing apprenticeship programs to identify best practices and lessons learned
        - Establish a partnership effort with the Office of Personnel Management (OPM) to explore opportunities to expand public service apprenticeships, particularly in common occupations across the Federal Government
    - Launch Apprenticeship Programs within DOL and Beyond

- ETA plans to lead by example by launching an internal apprenticeship program based on the successful pathways apprenticeship program DOL piloted several years ago; the goal is to develop a framework and structure that other DOL agencies and offices can eventually utilize
- ETA is working with other agencies within DOL to explore opportunities to expand apprenticeship across the Department
- ETA plans to track development of Federal Government Registered Apprenticeship Programs in the Registered Apprenticeship Partners Information Management Data System (RAPIDS)

o Innovate Recruitment and Support Strategies to Target Public Service/Federal Government Registered Apprenticeship Opportunities for Underrepresented Communities by Expanding Jobs to the Areas in Which They Live
- Widely publicize recruitment for key positions used across multiple agencies (*e.g.*, program analysts, program specialists, training representatives, project and contracting officers, etc.) to create economies of scale in on-boarding and training apprentices
- Work with OPM to consider options for larger-scale recruitment and pathway opportunities that can benefit multiple agencies in need of more Federal workers, while offering greater flexibilities that expand jobs to more localities
- Consider using "Opportunity Zones" and other areas highlighted by the Federal Government with grants and incentives for DEIA development and support to define geographic areas
- Use existing resources such as the Universal Outreach Tool to help with targeting and outreach