

*Revised and released December 2021*

# ***Finishing the Job***

## **Best Practices for a Diverse Workforce in the Construction Industry**

A HOW-TO MANUAL FOR CONSTRUCTION OWNERS, DEVELOPERS,  
MANAGERS, CONTRACTORS, SUBCONTRACTORS, BUILDING TRADE  
UNIONS, TRAINING AND APPRENTICESHIP PROGRAMS AND  
COMMUNITY-BASED ORGANIZATIONS



This manual is a work in progress. It is produced by the Policy Group on Tradeswomen's Issues (PGTI), a regional collaboration of researchers, government agencies, unions, community-based organizations, developers and contractors committed to increasing access for women and people of color to good paying careers in the construction trades. Our goal is to make our shared efforts and experiences helpful to industry leaders who share our commitment. It is based on best practices developed on major projects that came close, met, or exceeded workforce hiring goals.

This manual and additional resources are available online at on the PGTI website at [Policy Group on Tradeswomen's Issues](#). There is also a comment section. We look forward to receiving feedback from users that will help us improve the tools contained here.

## **WHAT IS PGTI?**

The Policy Group on Tradeswomen’s Issues (PGTI) is a regional collaboration of stakeholders working together since 2008 to *crush the barriers to women’s access to good paying careers in the construction trades*. Participants include tradeswomen, regional and local political leaders, representatives from state and federal government agencies, union and contractor representatives, staff from pre-apprentice programs, community-based organizations (CBOs) and other interested parties. Participants meet every other month to build relationships and share information across silos of expertise, to identify points of intervention that will get women into training and jobs and support high retention rates for women in the trades. We begin each of our meetings with the following mantra:

*“We are in this together.  
There is no silver bullet.  
We will never, never give up.”*

## **WOMEN FIRST!**

Our focus on women explicitly supports efforts to increase *all* forms of diversity in the construction industry. In urban areas, as many as half of the women entering the trades are women of color. This demographic fact means that bringing more women into the trades addresses economic inequalities of both gender and race. As the industry opens up to women and people of color, the culture of workplaces is improving for all.

## **ACKNOWLEDGEMENTS**

These recommendations build on the work of many, including but not limited to the UMass Boston Labor Resource Center, the Dorchester-Roxbury Labor Committee, the UMass Boston Project Labor Agreement and its Access and Opportunity Committee, the Boston City Council Working Group on the Boston Resident Jobs Policy, the Boston Building and Construction Trades Council of the Metropolitan District, the New England Regional Council of Carpenters Women’s Committee, Building Pathways, Inc. Pre-Apprenticeship, the Massachusetts AFL-CIO, the University of Massachusetts Building Authority (UMBA) and its AOC at the Amherst, Boston and Lowell campuses, the Massachusetts Gaming Commission (MGC) and numerous construction unions and contractors across Massachusetts.

## **REVIEWERS**

Original reviewers (2014): Jill Alexander, Mukiya Baker-Gomez, Jill Houser, Rocky Hwasta, Janet Jones, Liz Skidmore and Susan Moir.

2018 reviewers: Lori Corsi, Maggie Drouineaud, Samantha Glatfelter, Jill Lacey Griffin, Jill Houser, Susan Moir, Margarita Polanco, Liz Skidmore, Danielle Skilling and Mary Vogel.

2021 reviewers: Jill Houser, Mary Vogel, Liz Skidmore.

## INTRODUCTION: THE IMPORTANCE OF WOMEN'S LABOR TO THE CONSTRUCTION INDUSTRY

This manual is intended for those who are committed to building a diverse construction workforce and are struggling with *how to do it* on their jobsite, at their company, in their apprentice training program, in their community or in their union.

For those who are not yet convinced of the value of building a diverse construction workforce, we have published our founding document, the research report [Unfinished Business: Building Equality for Women in the Construction Trades](#). For the convinced, we summarize below the arguments in *Unfinished Business*. You will need them when you face opposition.

Women's growing significance as an important segment of the construction workforce can be understood in the context of four economic factors:

- **The Labor Shortage in the Construction Industry:** The long-term workforce projection in construction is for severe labor shortages due to an aging workforce and early retirement levels in the industry. The average construction worker is now in their late 40s. Women, especially low wage women who are striving to improve their economic position, are an important source of the new talent for the construction workforce.
- **Growing Importance of Women's Earnings:** Women still earn 80¢ for every \$1.00 earned by men. Women of color earn less than 60¢ on the dollar. This disparity puts female-headed households and many families at high risk of financial vulnerability. Increased dependence upon women's earnings makes union construction jobs for women an important pathway to economic prosperity.
- **The Emerging Green Industry:** As the construction industry includes more green technologies and practices, new jobs are created. It is important to ensure that these jobs are union and do not result in an occupationally segregated gender ghetto where women find employment in lower skilled and lower paid jobs.

**DIVERSITY IS A UNION MARKET STRATEGY:** There is increasing demand by owners and developers for a diverse workforce. In Massachusetts, 93% of apprentice tradeswomen and 85% of apprentices of color are in joint union apprentice programs. The ability of building trades unions and joint apprenticeship programs to provide a diverse skilled workforce will grow their market share.

We are less concerned with any company's or individual's motivation to embrace diversity as long as they cease being a barrier to women entering the trades.

The economic drivers above, if combined with the political will to confront and diminish widespread discrimination against women across the construction industry, can create a higher demand and pull more women into better paying construction careers.

## GAME CHANGERS

Since the first publication of this document, some BEST PRACTICES have proven to highly impact change.

- **WOMEN FIRST!** When setting goals, establishing diversity systems, monitoring and enforcing, WOMEN should be the first category of underrepresented workers at each stage. WOMEN are the most underrepresented, the last hired and first laid off, and women of color are entering the trades at higher rates. Diversity categories should be expressed and addressed in the order of priority: WOMEN, “minorities,” residents, veterans.\*
- **DIVERSITY MUST BE EMBEDDED IN OPERATIONS:** Along with constructability, insurability, financial security and safety, diversity goals and practices must be built into the business operations of industry stakeholders at all levels from project owner to sub-tier contractor, from compliance officers to project managers, from union hall to apprenticeship training program.
- **DIVERSE CORE CREWS CHANGE EVERYTHING:** When a contractor or sub-contractor begins work on a project with a crew that is all male and all white, workforce diversity is all about catch up. Once a job has begun, replacing white and/or male core crew members with women and people of color to “improve the numbers” creates resentments and undermines the mission. The game changer is for contractors to diversify the workforce that they carry with them from job to job and *arrive on a project with a crew that meets the goals from day one*. And women workers on core crews get better training and have steadier employment. A non-diverse core crew can no longer be accepted as an excuse for not meeting goals.
- **FREQUENT EXTERNAL MONITORING:** The dynamic and transitory nature of construction makes it nearly impossible to catch up with non-construction related problems. We have found that an external Monitoring Committee (frequently called Access and Opportunity Committees, or AOCs), whose singular responsibility is monitoring compliance and reinforcing best practices for workforce diversity is the best method of staying on track and on time. This body may be established by the construction owners or by affected communities, but it must have the support of the project’s decision makers and at least monthly access to all workforce compliance data by subcontractor and by trade.

## THE CRITICAL NEED FOR DIVERSITY TRAINING IN THE CONSTRUCTION INDUSTRY

The movement to crush the barriers to jobs in the construction industry and open up the trades to women is not simply a matter of counting hours nor can it be reduced to institutional reform. The industry is undergoing a revolutionary cultural change. Not long ago, when one tradeswoman—

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\* A recent study has found that veterans are overrepresented in the construction workforce. See *Springfield Disparity Study*. In addition, data from two large PGTI targeted projects suggests that privileging veterans favors white males and may counteract diversity efforts.

alone—went to work, her struggle was adaptation to a “man’s world.” The hostile workplace and casual harassment perpetrated by this one man or that other guy was an incomplete picture. As we wrote in *Unfinished Business* in 2012, “***It is a culture that support anti-women attitudes and actions.***” Tradeswomen have battled those attitudes and actions for forty plus years. In the post #MeToo world, all women say this is no longer acceptable.

It is not a man’s world anymore (in construction or anywhere else) but the construction worksite continues to be male-dominated. Across our society, researchers, feminists, artists, writers, business, labor and entertainment leaders are asking questions about overcoming gender bias, of how men will change their attitudes and behaviors, of the ways that masculine dominance harms not only women workers, but also productivity and collective action. These are fancy variations on the leadership that tradeswomen have taken for decades every time they walked onto a construction worksite alone on any given workday when they are confronted with sexism and discrimination.

It is time for the male leadership of the industry to take on these questions and be partners in changing the culture of construction from male dominance to one of diversity and equality.

How will this culture change? We do not have all the answers but the women and men of PGTI and our allies in Massachusetts and across North America have identified resources to support change:

- ***Sista in the Brotherhood*** is a 20-minute narrative film that tells the story of “a black tradeswoman who faces discrimination on a new job site and who must choose between making a stand or keeping her job.” This film *shows* viewers the abuses that tradeswomen live with and forces them to take a side. Available [here](#).
- The Ironworkers Union has launched a campaign called “***Be That One Guy.***” Be the tradesman who says, “No, stop that” when a woman is being harassed or is the butt of jokes, is not allowed to learn her trade, is treated as if she does not belong. Be the guy who treats tradeswomen with the respect they deserve. Be the one who takes on the guys who do not.

**Diversity Training** is needed across all stakeholder groups of the industry, but it needs to be *good* training. Good training may be hard to recognize but we can begin by eliminating bad training. Common examples included training to avoid legal troubles, training to learn to “manage” a diverse workforce, “let’s get along training,” such as “team building” that ignores differences and biases, and almost all online training. Good training starts with a skilled facilitator who understands the complexity of the problem and is committed to incorporating and demonstrating inclusiveness and equality in the training itself. One very effective program is [RISE Up](#) (Respect, Inclusion, Safety and Equity in the Construction Trades), a Respectful Workplace Program designed to provide all workers with the tools and support necessary to create and maintain a safe, inclusive and productive environment for everyone.

***A word about dinosaurs:*** Some men in the construction industry will not be not open to change and some will be actively opposed. Many of these will be in positions of power. It is the responsibility of male allies, who have power simply by the accident of being born male, to use that power to confront, isolate, force out or otherwise neutralize those men who will protect the *status quo* and will continue to uphold discrimination against women and people of color.

## **A DIVERSE CONSTRUCTION WORKFORCE IS EVERYONE’S RESPONSIBILITY**

*“The challenge is really getting acceptance by trade unions, contractors, developers, and builders so that they in their minds they can imagine and see a workforce that is 50% women and 50% men.” \**

We include in this document **six Best Practice Checklists**, one for each of the stakeholder groups that have responsibilities for success in increasing diversity in the construction workplace. These are:

- **Page 9-10: CHECKLIST #1: Best Practices for Owners and Developers**
- **Page 11-12: CHECKLIST #2: Best Practices for Construction Managers and General Contractors**
- **Page 13-14 CHECKLIST #3: Best Practices for Subcontractors**
- **Page 15-16: CHECKLIST #4: Best Practices for Building Trades Unions**
- **Page 17: CHECKLIST #5: Best Practices for Community-Based Organizations**
- **Page 18-21: CHECKLIST #6: Best Practices for Training and Apprenticeship Programs**

Each Checklist can be removed from this document and given to the relevant stakeholder. The Checklists identify the actions that should be addressed in each stakeholder’s area of responsibility in order to maximize the chances of success, before and during construction. If there is an overarching “game changer,” it lies in early and constant involvement in a project by all stakeholders—and especially those communities which have the most to gain from greater gender and racial diversity. Project by project, those committed to these goals have the opportunity to try and try again and to do better each time.

All of the Best Practices included in the Checklists have been tested on-site and made possible by broad stakeholder cooperation. To date these Best Practices have been used on over \$7 billion of construction in Massachusetts including, but not limited to, the five campuses of the University of Massachusetts, the three casinos built by the Mass Gaming Commission, and projects in the City of Worcester.

We look forward to feedback on the checklists and to improving them as they continue to be tested and expanded in the field.

Although each stakeholder group in construction has specific responsibilities for diversity, some steps cross all groups. We have identified four:

- Set and communicate high workforce participation goals early and often.
- Seek out and establish the partnerships needed to access and recruit a diverse workforce.
- Monitor and report progress to all stakeholders.
- Do it all again.

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\* Bruce Ratner, President & CEO, Forest City Ratner Companies, 2006, “Celebrating the Women Who Build Our Cities,” Nontraditional Employment for Women (NEW).

## STEP ONE: SET AND COMMUNICATE WORKFORCE PARTICIPATION GOALS EARLY AND OFTEN

Setting goals is relatively easy if a project is under government mandated workforce participation targets. The hard work is communicating and implementing public goals and getting private developers to set and enforce them.

- Do not accept the legal floor and oft used loophole of “good faith efforts.” “Good faith” is subjective and easily evaded. Demand “MAXIMUM POSSIBLE EFFORTS” or “ALL STEPS LEGALLY PERMISSIBLE” by all parties.
- If you are responsible for these targets, make them known to all upfront. Put the language in the first paragraph of bid packages and legal documents and in a larger font. Tell everyone from the beginning that the days of weak enforcement are over and they will be held to obeying the law. \*
- If you are a developer or contractor, know what the targets are. ANY PROJECT with a dollar of federal funding is subject to the national goal of 6.9% women’s hours. Statewide in Massachusetts, all “state-funded and state-assisted projects” require 6.9% women’s hours. In Boston, ALL PROJECTS, municipal and private (over 50K SF), require 12% women’s hrs.
- Each project should have a written document such as a Project Labor Agreement or Community Benefits Agreement that includes diversity goals before a shovel goes in the ground.
- Include the commitment to a diverse workforce at EVERY STAGE of a project:
  - Make diversity a prominent part of every pre-construction meeting with potential construction managers, general contractors and subcontractors
  - Require a written Diversity History and a Diversity Plan in bid submissions from all construction managers, general contractors and subcontractors

Subcontractors are both the critical point of entry and the weakest link in the chain. They do most of the hiring on a construction project, they are the most time-driven and can be the most economically marginal. ***THE SUBS MUST KNOW THAT YOU MEAN BUSINESS.***

## STEP TWO: SEEK OUT AND ESTABLISH THE PARTNERSHIPS NEEDED TO ACCESS A DIVERSE WORKFORCE

At the earliest stages of project planning, identify the pipelines needed to bring members of the community into successful apprenticeship and employment on the project. In Massachusetts, industry stakeholders partner with the network of [Building Trades Pre-Apprenticeship Programs](#) and [Build A Life That Works Campaign](#) to promote women’s opportunities in the union trades. Across the United States, tradeswomen’s organizations support pipeline activities. These organizations can be researched at the [National Center for Women’s Equity in Apprenticeship and Employment](#).

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\* See APPENDIX 1 for sample language.



Seek out and build relationships with area community-based organizations (CBOs), building trades unions, tradeswomen’s organizations, area One Stop Career Centers and training programs. Make your goals and commitment known to all partners. Designate the person who will be responsible for building partnerships.

Advertise your goals publicly with signage on the site and through community and social media. Make your commitment known to others in the industry.

## STEP THREE: REPORT AND MONITOR PROGRESS PUBLICLY AND TO ALL STAKEHOLDERS

***“That which gets measured gets done.”\****

Start compliance early and don’t let up. Measure everything weekly. Monitor layoffs and distribution of overtime. Make compliance a team effort including the Super and Project Manager. Know whose job it is to collect and report data. Integrate compliance in all existing systems. If you know how many board feet of lumber you have, do you know how many women’s work hours you have reached? Report data and trends at least bi-weekly. Report data by compliance category, by trade and by apprentice/journeylevel category. It is not acceptable—nor is it legal—to “diversify” through concentrating women and people of color in lower paid unskilled positions. Share data with community partners. Make data publicly available on the web.

A standing stakeholder Monitoring Committee (for example, “The Access and Opportunity Committee”), chaired by the end user, should meet regularly, include all stakeholder groups, and provide an agenda and minutes. †

## STEP FOUR: DO IT ALL AGAIN

Workforce participation targets are only a floor, the lowest of goals. Work toward more than compliance. Build permanent compliance systems into planning and construction. You count your materials inventory; put the same efforts into your human capital. Build a diverse core crew.

Utilize the principles of continuous improvement to achieve the best diversity results; identify opportunities in the process workflow to improve results; plan how the process can be improved; implement changes when necessary.

**Do better on the next project.  
Never, never, never give up.**

\* Then Boston City Councilor, now Congresswomen Ayanna Pressley, on getting compliance done, 2011.

† See APPENDIX 1 for sample contract language for a stakeholder committee.



## CHECKLIST #1: Best Practices for Owners and Developers

	<i>Action Steps</i>
<input type="checkbox"/>	1. Integrate “Women First” workforce diversity goals and strategies into your business operations and organizational structure including diversity training for all staff and diversity orientation for new hires.
<input type="checkbox"/>	2. Include DIVERSITY as a corporate and project Budget Item to ensure the availability of the time and costs that are needed to make workforce diversity a priority.
<input type="checkbox"/>	3. Highlight and emphasize the workforce goals for WOMEN in writing and verbally in all requests for proposals, invitations to bid and throughout bidding & construction process. Include Women First diversity goals as an agenda topic in pre-bid and all subsequent meetings with potential and designated contractors and subcontractors. Goals must be <i>up front and prominent</i> . (See APPENDIX 1 for sample language.)
<input type="checkbox"/>	4. Require CM/GC that are bidding on projects to provide historical and current data on workforce compliance on other projects. Bidders should address their diversity compliance strategy during the interview process.
<input type="checkbox"/>	5. Required workforce diversity goals should include 20% apprentice usage and direct entry to apprenticeship and employment for all successful graduates of <i>Building Pathways</i> or other area pre-apprenticeship programs for women and people of color.
<input type="checkbox"/>	6. Before a shovel hits the ground, <u>write</u> to the Trustees of the area joint apprenticeship programs to make them aware of the upcoming demand for WOMEN on this project. Ask to meet with them before the project begins if large.
<input type="checkbox"/>	7. Require that CM/GCs provide a written Diversity History and Project Diversity <i>Plan</i> and that they emphasize their workforce diversity goals for the project in writing and verbally during and after the bid process for subcontractors.
<input type="checkbox"/>	8. Require that the CM/GC designate a compliance officer for each project. Require that the CM/GC in turn require that all subs designate a single person to be the point of contact and authority for workforce diversity. Require weekly reporting on diversity numbers and weekly diversity meetings. Designate an Owner’s Diversity Representative to attend these meetings. Put language requiring such in your contract with contractual tools to enforce.

<input type="checkbox"/>	9. Establish a project-level Access and Opportunity Committee (AOC) to include all major stakeholder groups and conduct monthly detailed monitoring of compliance by all subcontractors, trades and worker status (journeylevel or apprentice).
<input type="checkbox"/>	10. Require that the CM/GC put processes in place for daily, weekly and monthly monitoring. These practices must include WEEKLY in-person Corrective Action meetings for all subcontractors that are consistently below the project goals. Project supervisors should attend all Corrective Action meetings.
<input type="checkbox"/>	11. Communicate to CM/GC <i>in no uncertain terms</i> that “maximum possible efforts” are required to ensure that <ul style="list-style-type: none"> <li>• Workforce goals will be met.</li> <li>• All anti-discrimination and anti-harassment laws are enforced.</li> <li>• The work environment will be free of harassment and discrimination.</li> </ul>
<input type="checkbox"/>	12. Require GC/CM to hold pre-construction meetings with all subcontractors, union business agents, local enforcement officials (if applicable) and interested community representatives to reinforce the message that this project will have a diverse workforce and to explore solutions to any foreseeable barriers. At these meetings develop specific, written plans for CM/GCs and subs to be successful in meeting the goals.
<input type="checkbox"/>	13. Ensure that an owner compliance representative is present during the review of subcontractor diversity histories and diversity plans and the final selection of subcontractors.
<input type="checkbox"/>	14. Analyze compliance over time for each subcontractor and union. Look closely at High Impact Poor Performers (HIPPs). Non-compliant large subcontractors will have the greatest impact on success or failure. See Appendix for AOC Monitoring Tools.
<input type="checkbox"/>	15. Recognize and acknowledge high performing subcontractors. Publicize success.

## NOTES

## CHECKLIST #2: Best Practices for Construction Managers (CMs) and General Contractors (GCs)

	<i>Action Steps</i>
<input type="checkbox"/>	1. Integrate “Women First” workforce diversity goals and strategies into your business operations and organizational structure.
<input type="checkbox"/>	2. Include DIVERSITY as a company and project Budget Item to ensure the availability of the time and resources that are needed to make workforce diversity a priority.
<input type="checkbox"/>	3. Highlight and emphasize the workforce goals for WOMEN in writing and verbally in all requests for proposals, invitations to bid and throughout the construction process. Include “Women First” diversity goals as an agenda topic in pre-bid and all subsequent meetings with potential and designated subcontractors. Clarify that “best faith efforts” are insufficient and the project requires MAXIMUM EFFORT.
<input type="checkbox"/>	4. Before a shovel hits the ground, <u>write</u> to the Trustees of regional joint apprenticeship programs (JATCs) to make them aware of the upcoming demand for WOMEN on this project.
<input type="checkbox"/>	5. Identify community stakeholders and meet with them periodically to update the community and get feedback.
<input type="checkbox"/>	6. Host and publicize Community Information Sessions about the project and the workforce goals. Invite union representatives to attend and provide information on apprenticeship and employment.
<input type="checkbox"/>	7. Include the costs of training and employing an on-site Compliance Officer in your project costs. Ensure that compliance appears as a project budget time and cost item.
<input type="checkbox"/>	8. “THE WOMAN IN THE TRAILER” Maximize the resources on site. You have an administrative staff person—usually a female—who is receiving and collating data. Expand her responsibilities to managing diversity data and monitoring implementation on site.
<input type="checkbox"/>	9. Establish a project-level Access and Opportunity Committee (AOC) to include all major stakeholder groups and conduct monthly detailed monitoring of compliance by all subcontractors, trades and worker status (journeylevel or apprentice).
<input type="checkbox"/>	10. Require that subcontractors provide a written company Diversity History as part of their bid submission. The requirement should specify the terms of the history, e.g., past three years, past 6 projects, or some other measure of past diversity performance. Tell subs to show up day 1 with a diverse crew. “We’ll fix it later” doesn’t work.

<input type="checkbox"/>	11. Require that subcontractors designate a single person to be the point of contact and authority for workforce diversity. Require weekly reporting on diversity numbers and weekly diversity meetings. Designate a GC/CM representative to attend these meetings.
<input type="checkbox"/>	12. Analyze compliance over time for each subcontractor. Compare workforce diversity with workforce projections. Look closely at High Impact Poor Performers (HIPPs). Non-compliant large subcontractors will have the greatest impact on success or failure.
<input type="checkbox"/>	13. Communicate to subcontractors <i>in no uncertain terms</i> that “maximum efforts” are required to ensure that <ul style="list-style-type: none"> <li>• All anti-discrimination and anti-harassment laws are enforced.</li> <li>• The work environment will be free of harassment and discrimination.</li> <li>• Workforce goals will be met.</li> </ul>
<input type="checkbox"/>	14. Communicate the goals of the Project Diversity Plan and expectations for on-site behaviors directly and in person to ALL on-site personnel. <ul style="list-style-type: none"> <li>• Require all on-site leadership (project supervisors, forepersons, stewards and others) to attend an orientation to the Project Diversity Plan before beginning work on the site.</li> <li>• Discuss the goals and expectations of the Project Diversity Plan with all new employees in their orientation.</li> <li>• Conduct regular toolbox talks on diversity to reinforce and remind all of expectations for behavior on-site.</li> </ul>
<input type="checkbox"/>	15. Ensure someone is assigned to perform regular audits of the entire jobsite to find and remove any sexist, racist or otherwise offensive items including calendars, pin-ups and graffiti, paying particular attention to portable toilets.
<input type="checkbox"/>	16. Require that all subcontractor requests for women workers and replies from the unions <b>MUST BE IN WRITING</b> and retained for the length of the project. The members of the AOC may review this documentation upon their request.
<input type="checkbox"/>	17. Corrective Action meetings with contractors who have failed to meet their contractual goals should be held <b>IN PERSON</b> and should include company representatives with the authority to change hiring practices, representatives from the relevant trade unions and joint apprenticeship programs. Each Corrective Action meeting should result in a written plan to be shared with the Access and Opportunity Committee.
<input type="checkbox"/>	18. When failure to comply is egregious, the CM/GC should notify the subcontractor that they are in violation of their contract. Monetary penalties and future debarment from bidding should be considered as company policy.

## CHECKLIST #3: Best Practices for Subcontractors

Subcontractors are the key to success of the hiring goals for any project because generally subs are the primary employers of tradespeople.

	<i>Action Steps</i>
<input type="checkbox"/>	1. Integrate “Women First” workforce diversity goals and strategies into your business operations and organizational structure.
<input type="checkbox"/>	2. Demonstrate and document that your company is making <i>maximum possible</i> efforts to meet the workforce participation goals, especially for WOMEN, as required by your contract. Examples: <ul style="list-style-type: none"> <li>○ Have you budgeted for diversity compliance?</li> <li>○ Do you have someone on staff who is knowledgeable about diversity issues?</li> <li>○ Are all your site supervisory personnel aware of and supporting your diversity goals? If not, are you providing direction and training?</li> <li>○ Have you conducted an audit of diversity on past projects?</li> <li>○ Do you have women on your core crews?</li> <li>○ Have you contacted your signatory joint apprenticeship program about your needs for women and tradespeople of color before the project begins??</li> </ul>
<input type="checkbox"/>	3. Meet workforce goals on all projects by hiring a diverse workforce <i>by trade, by week</i> from day one.
<input type="checkbox"/>	4. Bring WOMEN, people of color and local residents into your core crew. The long-term solution to meeting workforce hiring goals is to include women and people of color in your core crew. When you find solid women and people of color, keep them, mentor them, invest in them as you always have for your traditional core crew.
<input type="checkbox"/>	Your workforce is trained by a <b>Joint</b> labor management apprenticeship center. Make clear to your management trustees that you are hiring more tradeswomen and need the JATC to admit them and retain them.
<input type="checkbox"/>	6. Ensure that the company owner/ president monitors compliance frequently.
<input type="checkbox"/>	7. Refuse to engage in “checkerboarding,” the practice of bringing workers on jobs to meet goals, then moving them to another project. Checkerboarding is unfair, illegal and often results in inadequate skill development.
<input type="checkbox"/>	8. Treat the goals like a floor, not a ceiling. Exceeding the goals IS THE GOAL>

***Workforce diversity is the future.***

***Subcontractors who get on board will increase their market share.***

“Awareness of the business case for inclusion and diversity is on the rise. While social justice typically is the initial impetus behind these efforts, companies have increasingly begun to regard inclusion and diversity as a source of competitive advantage...”

—Hunt *et al*, *Delivering Through Diversity*, Jan 2018.

“Workplace diversity is strongly related to team performance and overall profitability.”

—Serban, R, *Here’s How Workplace Diversity Boosts Profitability*, Jul 2017.

“Companies that understand the need for diversity and inclusion and develop policies and culture to support it are better poised to compete.”

--Murray, *Why Diversity is the Key to the Construction Industry’s Future*, Oct 2015.



## CHECKLIST #4: Best Practices for Building Trades Unions

	<i>Action Steps</i>
<input type="checkbox"/>	<p>1. Inform all staff and the membership of the Union’s commitment to employing <i>maximum possible</i> efforts to meet diversity goals on area construction projects.</p> <ul style="list-style-type: none"> <li>○ Provide training for union leadership and the membership on diversity, anti-discrimination and cultural competency.</li> <li>○ Require certification in diversity practices for stewards and forepersons.</li> <li>○ Adopt the “Be That One Guy” approach to training men to support tradeswomen in their unions and at work.</li> <li>○ Adopt the goal and plan out concrete steps and timelines to achieve <b>20% tradeswomen</b></li> </ul>
<input type="checkbox"/>	<p>2. Develop outreach tools to recruit WOMEN as new apprentice applicants, including application dates and locations, requirements, criteria and the process used to determine how applicants will be chosen for apprenticeships. Bring female members to career fairs and other outreach events.</p>
<input type="checkbox"/>	<p>3. Advertise for women apprentices with language such as “Actively Seeking Women Applicants.”</p>
<input type="checkbox"/>	<p>4. Build relationships with organizations that can be pipelines to new, qualified members. These include pre-apprenticeship programs and community-based organizations.</p>
<input type="checkbox"/>	<p>5. Develop and implement strategies to improve retention of women and people of color including mentoring and constituent committees and caucuses. Support the establishment of a union Women’s Committee and other leadership opportunities for tradeswomen.</p>
<input type="checkbox"/>	<p>6. Support and collaborate with community groups on pre-apprentice and retention programs for women and people of color.</p>
<input type="checkbox"/>	<p>7. Develop and implement strategies to address underutilization in apprentice enrollment as well as apprentice completion.</p>
<input type="checkbox"/>	<p>8. Repudiate “checkerboarding,” i.e., keeping women and people of color on jobs just long enough to meet the compliance hours, and instead commit to increasing the numbers of women and people of color who reach journeyworker status.</p>
<input type="checkbox"/>	<p>9. Elevate a tradeswoman into a position of liaison and advocate for the women in the membership. MAKE WOMEN STEWARDS.</p>
<input type="checkbox"/>	<p>10. PROMOTE women to be stewards, forepersons, apprentice instructors, executive committee members and other leadership positions. Promote one woman for every man until you reach 20% female representation.</p>
<input type="checkbox"/>	<p>11. Outreach at community events, job fairs, voc-tech schools including <i>MA Girls in Trades</i> and the <i>Build A Life That Works</i> initiative.</p>

<input type="checkbox"/>	12. Sign a Direct Entry Agreement with union-affiliated pre-apprenticeship programs to accept qualified graduates who have prepared for the trade of their choice.
<input type="checkbox"/>	13. Advertise orientation activities to women and people of color. Offer Trade Talks, boot camps, prep classes and other activities to educate a diverse group of applicants for your trade.
<input type="checkbox"/>	14. Attend pre-construction meetings on new projects to better understand the diversity needs of the projected workforce and demonstrate the commitment of the union to providing women and people of color.
<input type="checkbox"/>	15. Designate a representative to each active Access and Opportunity Committee and ensure that the representative attends and participates in the AOC meetings.
<input type="checkbox"/>	16. Respond to written requests for diverse workers in writing. Share those letters with your JATC to help close the supply/demand loop. The JATC needs to know if/when the Local isn't meeting goals.
<input type="checkbox"/>	17. PUBLICIZE UNION SUCCESS ON BUILDING A DIVERSE WORKFORCE AND MOVING TOWARD 20% TRADESWOMEN.

## NOTES



## CHECKLIST #5: Best Practices for Community-Based Organizations (CBOs)

	<i>Action Steps</i>
<input type="checkbox"/>	1. Ensure inclusion of area Community Based Organizations on notification lists for projects before Request for Proposals (RFP) stage.
<input type="checkbox"/>	2. Identify each developer, the funding source(s) and the size and duration of a area project. Meet with the developer and owner as early as possible to discuss their plans for meeting hiring goals. Build relationships with public and private entities that do ongoing construction such Mass Department of Transportation, local colleges and hospitals, etc.). Know that key decisions are made on projects about 2 years before a shovel breaks ground and get involved early.
<input type="checkbox"/>	3. Ensure community benefits and participation agreements are prominently included in Requests for Proposals (RFP). Advocate for a compliance committee like an Access and Opportunity Committee.
<input type="checkbox"/>	4. Obtain data on the past 5 years of compliance with the Boston Resident Jobs Policy (BRJP) or other relevant state and/or federal mandates for General Contractors (GCs) and Construction Managers (CMs).*
<input type="checkbox"/>	5. Ensure that scheduled post-award meetings with the developer and GC/CM before the project starts include CBO representatives as well as other stakeholders. Identify the developer's and CM/GC's designated persons responsible for community relationships and compliance.
<input type="checkbox"/>	6. Ensure CBO representatives meet with GC representatives, city or state monitors and other stakeholders to review and discuss compliance numbers and related issues at least every 2 weeks (or as needed) for duration of project. Insist on remedies anywhere compliance is lacking.
<input type="checkbox"/>	7. Monitor walk-on list and other recruiting methods at each meeting.
<input type="checkbox"/>	8. Designate permanent representatives to the Access and Opportunity Committee and ensure that they provide regular reports to CBO membership.

\* Data on compliance with Boston Resident Jobs Policy is available online at <http://www.cityofboston.gov/brjp/> and <https://data.boston.gov/dataset/boston-jobs-policy-compliance-reports/resource/5ab4b4de-c970-4619-ab55-ce4338535b24?filters=Agency%3ABRA>

## CHECKLIST #6: Best Practices for Training and Apprenticeship Programs

PGTI's proposed National Generic Checklist, comments from DOL/OA. 10/20/2021

	<i>Action Steps</i>
<p><b>INTERNAL COMMUNICATION OF THE SPONSOR'S EQUAL OPPORTUNITY POLICY</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The Training or Apprenticeship Program includes the EEO (Equal Employment Opportunity) pledge clearly in outreach and promotional materials.</li> <li><b><i>“[Name of sponsor] 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. [Name of sponsor] 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.”</i></b></li> <li><input type="checkbox"/> The sponsor’s Affirmative Action Plan (AAP) and Selection Procedure was completed on [date] and the next required annual analysis and review will be completed by [date].</li> <li><input type="checkbox"/> Revisions to the AAP and Selection Procedures based on the annual review were submitted to the Registration Agency for approval on [date].</li> <li><input type="checkbox"/> The EEO Pledge is prominently posted in the Training Center /Employer Sponsor facilities and in common meeting spaces where apprentices and journeymen may gather.</li> <li><input type="checkbox"/> All training center personnel, including trustees, staff and instructors, have received training in the goals and practices of the Affirmative Action Plan and Selection Procedure and are familiar with diversity, equity and inclusion practices, anti-discrimination and cultural competence.</li> <li><input type="checkbox"/> Female journeymen are actively involved in all steps of the AAP’s implementation including communication, outreach, selection, placement and retention.</li> <li><input type="checkbox"/> The AAP is widely disseminated within the organization, ensuring that staff and apprentices receive it.</li> </ul>

## OUTREACH

- Those persons responsible for outreach to women, people of color and other under-represented populations are clearly identified and a budget is allocated.
- An analysis of deficiencies in past outreach and selection has been completed and used to inform the updated data appearing in the SAA/OA Workforce Analysis Sheet. This information is used to inform the updated AAP and Selection Procedures.
- A detailed written plan for adequate and positive outreach which identifies at least 5 “best sources” for qualified women applicants is complete and incorporated into the AAP. Sources will include, but not be limited to:
  - Local tradeswomen’s organizations
  - One Stop Career Centers and Employment Service Agencies
  - Women’s organizations and educational institutions
  - Vocational and technical schools including high schools
  - Area pre-apprenticeship programs
  - Any additional relevant Community-Based Organizations
- The written plan includes:
  - Who will be contacted? (agency, person, etc.)
  - When they will be contacted? (date, frequency)
  - Where are they located? (city, state)
  - How they will be contacted? (electronic media, newspaper ads, career fairs, community flyers, public transportation ads, PSAs, etc.)
  - Subject matter of contact
  - Who will be contacting the source
  - Sample of job posting including the language “**Actively seeking women applicants**” when women are under-represented based on local labor force participation.
  - Sample of correspondence notifying applicant(s) of status
- Outreach materials include but are not limited to:
  - when and where to apply
  - qualifications as listed in the sponsors standards
  - a sample application
  - short testimonials from current/past female apprentices
  - gender sensitive FAs
  - the phrase “**Actively seeking women applicants**” when women are under-represented based on local labor force participation.

<p><b>SELECTION</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Women journeypersons are actively involved in reviewing, interviewing and selecting applicants.</li> <li><input type="checkbox"/> Before selection begins, the eligibility pool is analyzed to ensure adequate representation by women before selection.</li> <li><input type="checkbox"/> Additional strategies may require bringing in outside consultation from the state Division of Apprentice Standards or regional tradeswomen’s organizations.</li> <li><input type="checkbox"/> If selection uses a ranked pool, after ranking, the pool is again reviewed to ensure adequate representation by women before final selection. All applicants’ names, gender, ethnicity and rank are documented in a bound log maintained by the Sponsor.</li> </ul>
<p><b>PLACEMENT</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> All apprentices are rotated through OJT and receive equal opportunity and hours on the job. Performance is documented on evaluation.</li> <li><input type="checkbox"/> If the annual review reveals unequal hours worked by female apprentices, placement procedures are modified to equalize training hours on the job. The annual review will collect data regarding access to and placement on contractor core crews.</li> <li><input type="checkbox"/> The Training Center and its Trustees and Employer/Sponsors will host an annual EEO workshop for <u>employers and training staff</u> to review an updated plan, to clarify the goals and procedures of the AAP and discuss collaborations for improvement. Career Centers, CBOs, OA, OFCCP and SAA and other partners are invited to EEO workshops.</li> </ul>
<p><b>RETENTION</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The training staff of the Center/Employer Sponsor is diverse, reflecting the equal opportunity goals of the sponsor.</li> <li><input type="checkbox"/> The periodic review and evaluation of apprentices’ performance is essential to well-rounded training and is required in the Program Standards of the SAA/OA. The review shall include an analysis of possible bias by individuals within the evaluation procedures and/or acknowledgment of mitigating factors that are negatively impacting apprentice performance and the offer of reasonable accommodations and support as appropriate.</li> <li><input type="checkbox"/> Programs with Affirmative Action Plans are required to perform an annual review that must be a careful, thorough, and systematic one and include review of all aspects of the apprenticeship program at the program, industry and occupation level, including, but not 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,</li> </ul>

	<p>and the program’s accessibility to individuals with disabilities (including to the use of information and communication technology). The sponsor must make any necessary modifications to its program to ensure that its obligations under this part are met.</p> <p><input type="checkbox"/> Adequate and safe equipment and facilities for training and supervision (as called for the Program Standards) should be of a size that is suitable to all sizes apprentices, including women.</p> <p><input type="checkbox"/> Exit interviews should be used to capture the extent of factors that contributed to the loss of each apprentice and used to inform policy and procedure.</p>
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**The goal for women in apprenticeship programs is 40% ... give or take.**

The Department of Labor’s new Equal Employment Opportunity (EEO) regulations for Registered Apprenticeship Programs (29 CFR Part 30) were created to help women, people of color and individuals with disabilities have greater access to and success in apprenticeship in the construction trades and other fields.

The new EEO Regulations require apprenticeship programs to conduct systematic and detailed analysis of groups in their recruitment area that have been historically excluded from apprenticeship (“underutilization”). For people of color, online tools have been developed to assist in these calculations. For people with disabilities, there is a national standard of 7% which programs will use to assess “whether or not impediments to equal opportunity exist.”

The final step in analysis of underutilization is a choice between two statistical methods, one of which is the 80% method. “Under the ‘80% method,’ if utilization is less than 80% of availability, it is considered significantly less.” While the actual demographic analysis tool is not yet on the Office of Apprenticeship website, the 80% method is simple for calculating the goal for women.

**Let’s do the math.**

- Calculate the number of individuals in the recruitment area who meet the program qualifications of minimum age and education level. (Remember that previous experience and skill level are NOT requirements to enter apprenticeship).
- Calculate the percent of those who are eligible who are women = ~50% (may be higher as women generally have higher educational attainment levels).
- **Apply the 80% method: 80% of 50% = 40%**

Through the application of “underutilization” and “availability in the relevant recruitment area” as standards for judging opportunity, the new EEO Regulations establish a goal of **40%** (give or take) for women’s participation in apprenticeship programs.

**RESOURCES**

The US Department of Labor’s Office of Apprenticeship at <https://www.dol.gov/agencies/eta/apprenticeship>

The Policy Group on Tradeswomen’s Issues (PGTI) has an archive of resources at <https://policygroupontradeswomen.org/resources-for-training-and-apprenticeship-programs/>.

## APPENDIX 1:

### SAMPLE CONTRACT LANGUAGE FOR STAKEHOLDER COMMITTEE

From the **UMASS BOSTON Project Labor Agreement** (full PLA available [here](#))

#### ARTICLE III-A

##### ACCESS AND OPPORTUNITY COMMITTEE

The parties have agreed to various provisions of the PLA to achieve the inclusion of minority business enterprises and women business enterprises in the contracting opportunities and minority and women individuals in the employment opportunities created by the covered work. In order to implement and monitor the progress of these anti-discrimination and equal contracting and employment opportunity provisions, the parties, in recognition of their mutual commitment and the partnership they have established to achieve those goals, shall form an Access and Opportunity Committee. The Access and Opportunity Committee will serve as the central forum for representatives of all interested or affected individuals to exchange information and ideas and to advise the parties concerning the operation and results of the Program Requirements contained in Appendix C and the ongoing role of this PLA as an integral component of the Program. As part of these responsibilities, the Access and Opportunity Committee will assess the obstacles to success of achieving inclusion of minority and women workers in the construction opportunities and shall make recommendations for additional programmatic efforts to overcome some of those obstacles.

##### Section 1. Membership and organization

- (a) The Owner shall appoint representatives of all interested segments of the community to an Access and Opportunity Committee, which will include local, minority and women business organizations, community-based organizations, the Unions and Contractors, and the Owner. The Owner shall seek the advice of the Access and Opportunity Committee in considering the appointment of subsequent members.
- (b) The Access and Opportunity Committee will establish its rules of procedure.
- (c) A representative of the Construction Manager, or some other person or entity selected by the Owner, will chair the Access and Opportunity Committee.

##### Section 2. Meetings

- (a) The Access and Opportunity Committee will meet monthly or, more frequently at the call of the Chair.
- (b) A representative of the Owner, preferably the staff member or contracted individual to lead monitoring and compliance efforts on behalf of the Owner, shall chair the Access and Opportunity Committee. The chair will establish agenda topics with input from the committee members and send notices of meetings with the agenda in advance of the meetings.
- (c) The meetings will receive reports and consider work progress and practices, minority business enterprise and women business enterprise utilization, minority and women participation as labor, apprentice development and utilization, pre-apprentice recruitment (if any), training and referral, and other issues of concern to the Access and Opportunity Committee.
- (d) Each Contractor shall report on monthly progress on these issues and provide ongoing workforce projections for their work.

## **APPENDIX 2: The United States Department of Labor’s required “16 Steps” for a safe and diverse construction workplace**

**The 16 Steps – 41 CFR 60-4.3(a)(7)** The Contractor shall take specific affirmative actions to ensure equal employment opportunity. The evaluation of the Contractor's compliance with these specifications shall be based upon its effort to achieve maximum results from its actions. The Contractor shall document these efforts fully, and shall implement affirmative action steps at least as extensive as the following:

a. Ensure and maintain a **working environment free of harassment, intimidation, and coercion** at all sites, and in all facilities at which the Contractor's employees are assigned to work. The Contractor, where possible, will **assign two or more women to each construction project**.

The Contractor shall specifically **ensure that all foremen, superintendents, and other on-site supervisory personnel are aware of and carry out the Contractor's obligation to maintain such a working environment**, with specific attention to minority or female individuals working at such sites or in such facilities.

b. Establish and maintain a **current list of minority and female recruitment sources**, provide **written notification to minority and female recruitment sources** and to community organizations **when the Contractor or its unions have employment opportunities available**, and maintain a record of the organizations' responses.

c. Maintain a **current file of** the names, addresses and telephone numbers of **each minority and female off-the-street applicant and minority or female referral** from a union, a recruitment source or community organization and of what action was taken with respect to each such individual. If such individual was sent to the union hiring hall for referral and was not referred back to the Contractor by the union or, if referred, not employed by the Contractor, this shall be documented in the file with the reason therefor, along with whatever additional actions the Contractor may have taken.

d. Provide immediate written **notification to the Director when the union or unions with which the Contractor has a collective bargaining agreement has not referred to the Contractor a minority person or woman sent by the Contractor**, or when the Contractor has other information that the union referral process has impeded the Contractor's efforts to meet its obligations.

e. **Develop on-the-job training opportunities and/or participate in training programs** for the area which expressly include people of color and women, including upgrading programs and apprenticeship and trainee programs relevant to the Contractor's employment needs, especially those programs funded or approved by the Department of Labor. The Contractor shall provide notice of these programs to the sources compiled under 7b above.

f. **Disseminate the Contractor's EEO policy** by providing notice of the policy **to unions and training programs** and requesting their cooperation in assisting the Contractor in meeting its EEO obligations; by including it in any policy manual and collective bargaining agreement; by publicizing it in the company newspaper, annual report, etc.; by **specific review of the policy with all management personnel and with all minority and female employees at least once a year**; and by posting the company EEO policy on bulletin boards accessible to all employees at each location where construction work is performed.

g. **Review, at least annually, the company's EEO policy and affirmative action obligations under these specifications with all employees having any responsibility for hiring, assignment, layoff, termination or other employment decisions including specific review** of these items **with onsite supervisory personnel** such as Superintendents, General Foremen, etc., **prior to the initiation of construction work at any job site**. A written record shall be made and maintained identifying the time and place of these meetings, persons attending, subject matter discussed, and disposition of the subject matter.

h. **Disseminate the Contractor's EEO policy externally** by including it in any advertising in the news media, specifically including minority and female news media, **and providing written notification to and discussing the Contractor's EEO policy with other Contractors and Subcontractors with whom the Contractor does or anticipates doing business**.

i. **Direct its recruitment efforts, both oral and written, to minority, female and community organizations**, to schools with minority and female students and to minority and female recruitment and training organizations serving the Contractor's recruitment area and employment needs. Not later than one month prior to the date for the acceptance of applications for apprenticeship or other training by any recruitment source, the Contractor shall send written notification to organizations such as the above, describing the openings, screening procedures, and tests to be used in the selection process.

j. **Encourage present minority and female employees to recruit other minority persons and women** and, where reasonable, provide after school, summer and vacation employment to minority and female youth both on the site and in other areas of a Contractor's work force.

k. **Validate all tests and other selection requirements** where there is an obligation to do so under 41 CFR Part 603.

l. Conduct, at least annually, an inventory and **evaluation at least of all minority and female personnel for promotional opportunities** and encourage these employees to seek or to prepare for, through appropriate training, etc., such opportunities.

m. **Ensure that seniority practices, job classifications, work assignments and other**



**personnel practices, do not have a discriminatory effect by continually monitoring all personnel and employment related activities** to ensure that the EEO policy and the Contractor's obligations under these specifications are being carried out.

n. **Ensure that all facilities and company activities are nonsegregated except that separate or single-user toilet and necessary changing facilities shall be provided** to assure privacy between the sexes.

o. Document and **maintain a record of all solicitations of offers for subcontracts from minority and female construction contractors** and suppliers, including circulation of solicitations to minority and female contractor associations and other business associations.

p. Conduct a **review, at least annually, of all supervisors' adherence to and performance under the Contractor's EEO policies and affirmative action obligations.**

## APPENDIX 3: Compliance Monitoring Tools

### GC/CM Best Practices

1. **CORE CREWS:** All subcontractors were notified repeatedly in their contract and at pre-bid and pre-construction meetings of the requirement to begin work with a diverse crew. Any subcontractors that fail to arrive on site on day one without a diverse core crew should receive a written warning that informs them of the requirement to bring on only tradeswomen and tradespeople of color as the crew expands until such time as they have exceeded the contract requirements for diversity. (It is NOT a Best Practice to lay off non-diverse workers and replace them with women and people of color. This breeds resentment and may create hazardous working conditions for the new workers).
2. Monitor and maintain 20% of hours completed by apprentices. New and previously disadvantaged workers are heavily represented in apprenticeship.
3. Workforce diversity hours for ALL subcontractors should be reviewed on a daily basis by the GC/CM Compliance Officer.
4. **Corrective Action Meetings** should be held immediately with all subs that fall below the required goals. Standard practices for Corrective Action should include;
  - a. Participation by the relevant union Business Agents.
  - b. Written documentation of the sub's ask and the union's response to workforce requests.
  - c. Written documentation of the sub's notification to the Trustees of their Apprenticeship Training Program of their increased need for women and/or people of color in order to meet the sub's contractual obligations for a diverse workforce.
5. **MAINTAIN ALL BEST PRACTICES DURING OVERTIME SHIFTS.** The industry slips back into old and exclusive practices during overtime. Monitor fairness of overtime opportunities for ALL workers.

### Monitoring Committee Best Practices - HIPP Analysis (High Impact Poor Performers)

The Monitoring Committee should review compliance data for all subcontractors at least monthly.

Developer/owners and GC/CMs should develop **internal penalty systems** for subcontractors that consistently fail to meet the contractual requirements for a diverse workforce. These penalties should include the risk of debarment from further contracts where it becomes clear that non-compliance is egregious.

During the life of a project, non-compliant large subcontractors will have the greatest impact on success or failure of meeting the diversity goals. HIPP analysis (High Impact Poor Performers) aids in identifying and targeting these subs.

1. Identify the 6-10 subcontractors that are performing the highest number of hours.
2. ID the HIPPs, those high hour subcontractors who are below the required diversity goals.
3. Target the HIPPs for *special attention* before the next meeting of the Monitoring Committee meeting.



## ***Game Changers***

### **Proven strategies for increasing gender and racial diversity on construction sites**

1. Prioritize diversity from day one of conception of the project. Budget and plan for diversity.
2. Project Labor Agreements are proven to improve diversity performance.
3. Establish an Access and Opportunities Committee (AOC) that includes all stakeholders, meets monthly and rigorously reviews monitoring data and compliance strategies.
4. Establish and budget for a comprehensive reporting and monitoring system, including collecting written documentation of all workforce requests and union responses.
5. Use HIPP analysis (High Impact Poor Performers) to identify and improve the worst performers.
6. Workforce participation targets are a floor, not a ceiling. Aim above the targets.
7. Report data at least monthly in an online and searchable format.
8. Establish from the bid process that core crews are no excuse for not complying with contractually mandated workforce diversity. Prioritize the placement of women and people of color on core crews to ensure steady employment and consistent skills training.
9. End “checkerboarding.” Stop the practice of moving women and people of color from job to job to cover diversity targets. Checkerboarding interrupts tradesperson’s on-the-job skills training and results in fewer women staying in the trades.
10. End tradeswomen’s isolation on worksites. Assign tradeswomen, especially those new to the trades, in pairs or more.
11. WBEs are not a solution. Historically WBEs hire women at lower rates than other contractors.
12. When subcontractors fail to comply with their contracts, fine them using the New Haven model of clear notification followed by small initial fines with aggressive escalation.
13. It is the increase in numbers and the presence of tradeswomen on sites that will change the industry and drive all diversity goals. Hire more women.

PGTI's mantra: *We are in this together. There is no silver bullet.  
We will never never never give up.*

## 5 tips for increasing women's participation in the construction trades from New Zealand's Canterbury Rebuild \*



### Develop and communicate your business case

Develop your business case: for example, high demand for a skilled workforce and low numbers of women training or working in your industry

### Collaboration

Identify your allies and get a core of influential people and organisations together



### Visibility

Make women in trades in your industry or region visible

### Treasure what you measure

Measure baselines and set targets to increase understanding and drive accountability



### Leading from where you are

Make the most of your leaders wherever they are.

\* Getting it done: Utilising women's skills in the workforce-Lessons from the Canterbury rebuild, New Zealand Ministry for Women, August 2015, <http://women.govt.nz/documents/getting-it-done-utilising-womens-skills-workforce-2015>

## Punchlist for Finishing the Job:

- *We are in this together.*
- *There is no silver bullet.*
- *We will never, never give up.*