



## Secretary's Advisory Committee on Apprenticeship (ACA)

### Industry Engagement in New and Emerging Sectors

#### Subcommittee Members (by sector):

| Employer                                       | Labor                                  | Public           |
|--|--|------------------|
| Amy Kardel                                     | Daniel Bustillo                        | Orrian Willis    |
| Carolyn Holmes Lee<br>Delegate: Pooja Tripathi | John Costa<br>Delegate: Jamaine Gibson | Randi Wolfe, PhD |
|  | Bernadette Oliveira-Rivera             |                  |

**OA Subcommittee Leads:** Cierra Mitchell, Jim Foti

**ACA Subcommittee Spokespersons:** Amy Kardel, Orrian Willis, Daniel Bustillo

**ACA Members from Other Subcommittees:** N/A

#### Year 2 Issue – Registered Apprenticeship Career Pathways in New and Emerging Industries

##### Issue and Background:

How do we use registered apprenticeship to create career pathways for apprentices in new and emerging sectors, without compromising the quality and rigor of the registered apprenticeship system, and ensuring and enabling awareness and access for historically marginalized populations?

##### Strategic Importance of the Priority Issue:

- Many new and emerging sectors are disproportionately filled with workers from historically marginalized populations. This is especially true for the occupations in these industries that pay the lowest wages.
  - We need strategies to create opportunities for historically marginalized populations in low wage positions within new and emerging sectors to have access to registered apprenticeships and the opportunities it provides.
  - We also need strategies to work with employers, community partners, organized labor, and other stakeholders to create opportunities for historically marginalized populations to have access to higher paid industries through registered apprenticeship programs.
- Due to historic systemic segregation (e.g., economic, racial, gender, occupational), under-represented populations have often lacked access to advanced education and job training and to the supportive services necessary to succeed (e.g., tutoring, childcare, transportation, mentorship) in job training and careers.

- We can begin to address historic segregation by providing high quality, rigorous apprenticeships and career pathways that ensure broad access to education and training and effectively provide necessary supportive services.
- Registered Apprenticeship in the United States should be a fundamental driving force for economic growth. However, even in today's strong economy, many workers struggle in the job market and employers cannot find people with the skills they need. The coexistence of many unfilled positions and the large number of unemployed individuals, particularly historically marginalized workers and people of color, suggests that better information must be made available regarding career pathways and what it takes to gain access to and flourish in those pathways.

### **Recommendations and/or Best Practices and/or Definitions:**

- *Identification of relevant best practices*
  - We have to employ recruitment and outreach strategies that ensure that we are effectively targeting workers in new and emerging sectors and reaching the historically marginalized populations we hope to engage (e.g., advertise in the right places and to the right communities).
- *Recommendations for DOL investment*
  - DOL should create a mechanism to track and research the effectiveness of apprenticeship pathways in supporting worker access to upward career mobility, particularly for historically marginalized populations.
  - DOL should invest in marketing needed for the apprenticeship system and make clear to targeted communities how individuals can achieve upward economic mobility. DOL should also invest in marketing to employers, to make the case that by participating in RA there is a ROI for employers in engaging historically marginalized populations and making career pathways available, especially in new and emerging sectors.
  - OA needs to create a map of occupations within a given sector and identify worker pathways from one sector to another. The map should show how an individual can increase their wages along a pathway either within an industry or between industries.
  - OA should consider investing in development of an Apprenticeship Pathways Framework Tool to support workers and their economic growth and mobility. DOL should also make training for this tool widely available to stakeholders (e.g., ETA grantees, apprenticeship sponsors, and intermediaries among others). Lack of a career mobility tool is a challenge for current and former apprentices as well as those looking to enter a registered apprenticeship program. They do not have a way to determine their career paths, promotional opportunities, and future employment prospects, whether in a given occupation, sector or across various sectors.

- Historically marginalized workers and people of color are disproportionately affected by the lack of such a tool due to the additional challenges they can face in realizing upward mobility within the workplace.
    - Industry's ability to grow is also affected without a clear map of available registered apprenticeship paths as employers are less able to understand the various ways in which the system can support them in producing a competent worker within existing and emerging occupations.
- *Recommendations for innovation*
  - To advance best practice, we need definitions and agreement on key terms.
    - Pathways and career pathways
    - Occupational segregation
    - Rigor and quality
    - Family sustaining wages (FSW)
    - Living wage [national vs within a state vs by municipality]
  - As a best practice model, we would like to highlight the transit worker programs in Kansas City and Indianapolis. Individuals who have completed a RAP have priority when applying for higher wage positions.
    - The transit program created several apprenticeships in a pathway, where you can go from one to the next. There are prerequisites built into each.
    - In the operator apprenticeship program, there are skills that help you get into the bus mechanic program; if you've completed the operator program, you have the first right to get into the bus mechanic program.
    - The program can take participants from working on buses and trains and on to working on overhead lines.
    - The birth of mechanic program was to enable historically marginalized populations to move into positions that had stable hours and better wages. The program has achieved specific diversity breakthroughs for the targeted populations.
- *Other relevant items the subcommittee wants to report for ACA consideration.*
  - **U.S. National Qualifications Framework**
    - As a supplement to the Apprenticeship Pathways Tool, the DOL should investigate the potential of creating a U.S. National Qualifications Framework.
    - DOL should recruit a task force (or support the recently created U.S. QF) to comprehensively engage private sector, organized labor, education institutions, workforce development stakeholders, training providers, international leaders on the potential development of a U.S. National Qualifications Framework. Frameworks are critical when considering the mapping of career pathways and necessary to ensure the quality, rigor, and consistency of the education and training regimen.

**Addendum**

The below represents non-consensus views among the Industry Engagement in New and Emerging Sectors subcommittee in response to the request that subcommittees consider any implications of the recommendation that a “registered apprenticeship program must end in a family sustaining wage.” Each of the following two groups represents approximately half of the membership of the subcommittee.

*Group 1*

|                            |
|----------------------------|
| <b>Labor</b>               |
| Daniel Bustillo            |
| John Costa                 |
| Delegate: Jamaine Gibson   |
| Bernadette Oliveira-Rivera |

A Registered Apprenticeship must end with a living wage, provide family sustaining benefits, and adhere to the other principles laid out by the Departments of Commerce and Labor as Good Jobs Principles. We further recommend that the DOL only approve registration of apprenticeship programs which, at a minimum, pay its participants a living wage by the last stage of their program participation. This will ensure apprentices are able to successfully prepare for careers that upon completion of the apprenticeship program allow them to support themselves and their families.

Moreover, there should be no difference or special accommodations made for youth in apprenticeship as it relates to wage requirements. The living wage requirement should apply to all workers, including those participating in apprenticeship as part of their K-12 academic experience. This will both ensure that young adults are able to support themselves, while avoiding any potentially exploitative child labor practice.

Building pathways to apprenticeship in new and emerging sectors is critical to supporting the continued growth and expansion of Registered Apprenticeship. In identifying and supporting development of such pathways, special attention should be given to ensuring historically marginalized populations are aware of these opportunities and have equal access to ensure DEIA goals are met.

Based on the Committee’s position that for an occupation to be apprenticeable it must pay a living wage, the following recommendations are made regarding how the DOL can support development of effective apprenticeship pathways that recognize worker accomplishments, support their mobility, address employer needs and meet the goal of ensuring only those occupations that pay a living wage are approved as apprenticeable.

- An apprenticeship program may offer workers industry recognized credentials that enable them to work in certain jobs that are not apprenticeable occupations as part of their apprenticeship experience. For example: As part of a certified teacher apprenticeship program, apprentices may first earn a teacher assistant credential. This credential has value in the workplace and may result in higher wages but is not considered as an apprenticeship completion. Completion of the apprenticeship occurs once the apprentice earns their teacher certification.

- A job/position that currently exists in the marketplace, which does not pay workers a living wage, but which gives them foundational knowledge and skills that can be helpful to them in entering a related apprenticeable occupation can be developed as a pre-apprenticeship to apprenticeship pathway. For example, in healthcare a training program for a range of entry-level occupations can be formalized as a pre-apprenticeship to apprenticeship pathway through articulation agreements with healthcare Registered Apprenticeship programs for higher wage occupations. Direct entry and advanced credit could be given to apprentices entering the program through the pre-apprenticeship to apprenticeship pathway.
- Sponsors in new and emerging sectors that have multiple apprenticeship programs for various occupations all of which pay a living wage, can create pathways for apprentices to continue to grow and to meet DEIA and industry needs. Workers that have completed an apprenticeship program with the sponsor and are working within that occupation, but who are interested in transitioning into a new position could be given preference for entry into a new/different apprenticeship program and receive credit for any relevant skills gained in their previous apprenticeship. For example: An apprentice that completes a bus conductor apprenticeship program with a transit sponsor that also has a registered apprenticeship program for bus mechanic, could be offered direct entry into the bus mechanic apprenticeship program and be given credit/advanced placement into that program based on relevant transferrable skills.

Group 2

| <b>Employer</b>                                | <b>Public</b>    |
|--|------------------|
| Amy Kardel                                     | Orrian Willis    |
| Carolyn Holmes Lee<br>Delegate: Pooja Tripathi | Randi Wolfe, PhD |

**AREAS AROUND WHICH TO DEVELOP ADDITIONAL RECOMMENDATIONS  
RELATED TO WAGES AND REGISTERED APPRENTICES**

1. **Clarifying that a “wage threshold” would primarily apply to Apprenticeability vs. Individual Programs.**
  - It is not clear how Family Sustaining Wages (FSW) becoming a determinant for the apprenticeability of occupations would work in practice. Would existing apprenticeable occupations be “grandfathered” in? If so, that could put an unfair and unreasonable burden on new occupations, while not holding existing occupations to the higher standard supposedly at the root of the FSW recommendation. And if existing apprenticeable occupations are not grandfathered in, there would need to be a system through which currently apprenticeable occupations could be “recertified” as apprenticeable once having proven they meet the FSW requirement. Additionally, there would need to be the infrastructure in place to execute that system.
  - While DOL cannot mandate wages, it can and does use wages currently as one of the criteria for determining apprenticeability (e.g., requirements around wage scales and

prevailing wages). Rather than applying an FSW wage threshold to apprenticeability determinations, DOL should consider a formula including criteria such as:

- Is the occupation part of a pathway that leads to FSW?
- Does the journey level wage equal a certain wage criteria (e.g., percentage of FSW, CA Employment Training Panel trainee wage scale, living wage, 2X poverty wage)?
- Does the occupation require a post-secondary degree, Industry-Recognized Credential or License, etc., such that RAP certification could replace the current requirement?
- Does the journey level role generally meet the criteria of the DOL's [Good Jobs](#) principles?

## 2. Interim (Stackable) Credentials, as opposed to Stackable Apprenticeships.

- On the issue of “interim credentials, as opposed to stackable apprenticeships,” given that funding is often tied to apprentices’ completion rates, would an apprentice who chose to “stop” at the level of an interim credential/off-ramp be counted as a program completer? It would be very problematic if the only apprentices considered to be “completers” are those who continue until completion of the final credential.
- Career Pathways are an essential strategy for building our middle class. By integrating registered apprenticeship into pathway development, we create more equity by allowing participants to earn and learn. Further, when apprenticeships are [stacked in a pathway](#), the pathway is more approachable for workers from diverse backgrounds.
- Examples of best practice around stackable apprenticeships and career pathways include:
  - ICURO in California
  - NCEE Pathways 2-pager – <http://ncee.org/wp-content/uploads/2023/03/GlobalModelCareerPathways.pdf>
  - [Qualifications Frameworks](#) allow for workers to achieve credit for prior learning which can provide workers an ability to move through pathways more efficiently and allow for what is known as “permeability” between pathways. Qualification Frameworks support workers by allowing them to move through career pathways in a lattice as opposed to a ladder by giving them credit for any of their learnings along their work-based learning and educational continuum. The suggested analysis is specifically for improvement and sustainability of the registered apprenticeship system with the understanding that the results could have benefits more broadly across the US economy, our National Education Systems and National Workforce Development systems.
- Pathways and stackable credentials are widely used in the care economy, early care and education, transportation, cyber and IT industries. They are strong ways to build skills and lead to increased wages and more comprehensive compensation (e.g., health benefits).

- Examples of those pathways can be found in the table on Pages 4-5.

### **3. Other Specific Wage-related Issues to be clarified.**

- It is not feasible to recommend that apprenticeships must provide an FSW by some point during the apprenticeship program, especially since we don't have an agreed upon definition of the term.
- Without the definition and additional data to see if apprenticeships are leading to these higher wages, it isn't reasonable to request or require apprenticeship programs to achieve these wages before program completion. This could lead to the opposite of DOL's goal of encouraging more industries and companies to adopt Registered Apprenticeships.
- Since the concept of FSW is based on family structure, how would we impose that standard on an apprenticeship in which the apprentices represent a variety of family structures? For example, a single person with no children would be paid at one rate, while a single mother of three would be paid at another rate, while a married couple with no children would be paid at a third rate. Obviously, we can't have a situation in which two apprentices enter the same program and are paid at different rates. Using a family structure to determine appropriate wages for an apprentice would disproportionately and negatively impact workers who are parents. And as such, such a wage structure would disincentivize employers from hiring parents due to the requirement to pay them higher wages.
- There could be constitutional issues or civil rights or EEO violations arising from implementing a FSW requirement, particularly insofar as it disadvantages particular groups of with families.
- It is impractical to apply a requirement to employers, as wages are currently only recommended in the Schedule D of Apprenticeship Standards.
- There would be a marketing problem if employers were told what they are required to pay in order to work with registered apprenticeships.

**EXAMPLES OF INDUSTRY-SPECIFIC EXISTING APPRENTICESHIP PATHWAYS**

| Industry               | Occupations & Pathways   | Duration   | Wages   | Credentials Earned   | Brief Description  |
|------------------------|--|--|---|--|--|
| Early Care & Education | Associate Teachers to ECE Teachers to ECE Lead Teachers OR Home Visitor OR Expanded Learning Program Leader OR PreK-3 Paraprofessional | Associate Teacher: 18-24 months<br><br>ECE Teacher: 2-3 years<br><br>ECE Lead Teacher: 2-3 years | Associate Teacher - median annual salary: \$29,000<br><br>ECE Teachers - median annual salary: \$32,000<br><br>ECE Lead Teachers - median annual salary: \$58,000 | Associate Teacher Permit<br><br>Teacher Permit + AA degree<br><br>Master Teacher Permit + Site Supervisor Permit + BA degree | <p>Apprentices start in an Associate Teacher Apprenticeship, earning 12 college credits, 2000 hours of OJT, and becoming qualified for positions as Teacher’s Aide or Assistant.</p> <p>They are then eligible to advance into the Teacher Apprenticeship, earning AA degrees and 2000 hours of OJT training.</p> <p>Then they can choose between four advanced apprenticeships (Lead Teacher, Home Visitor, Expanded Learning Program Leader, or PreK-3 Paraprofessional), earning BA degrees and requisite professional credentials.</p> |
| IT/ Cyber              | IT Generalist to Information Security Analyst  | 1 <sup>st</sup> program is 12 months.<br><br>2 <sup>nd</sup> program is 18 months.               | IT Generalist Journey Level Wage \$30/hour<br><br>Information Security Analyst Journey Level Wage - \$42/hour   | CompTIA and other Industry Recognized Credentials  | <p>The IT Generalist RA prepares people for intro IT roles like Helpdesk. There are intro to security principles integrated into the IT Generalist program and the OJT as well as the RTI, which positions apprentices perfectly for a Information Security Apprenticeships.</p> <p>The Information Security Apprenticeship moves a worker from Intro IT skills to being a fully proficient entry-level Security Analyst.</p>  |



|                |                      |  |   |  |  |
|----------------|----------------------|--|---|--|--|
| Transportation | Operator to Mechanic |  | Operator: \$25-\$44/hour<br>Mechanic: \$35-\$59 |  | <p>In the operator apprenticeship program, there are skills that help you get into the bus mechanic program; if you've completed the operator program, you have the first right to get into the bus mechanic program. The program can take you from working on buses and trains all the way to overhead lines.</p> <p>The original intention of the mechanic program was to enable underrepresented populations to move into positions that had stable hours and better wages.</p> |
|----------------|----------------------|--|---|--|--|

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