



Secretary’s Advisory Committee on
Apprenticeship (ACA)

Modernization Subcommittee

Subcommittee Members (by sector):

Employer	Labor	Public
Obed Louissaint, Aptiv	Todd Stafford, Electrical Training ALLIANCE Delegate: Marty Riesberg	Erin Johansson, Jobs with Justice
Tim Oberg, Independent Electrical Contractors	Michael Oathout, International Association of Machinists and Aerospace Workers	Todd Berch, NASTAD Delegate: Chris Maclarion, State of Maryland

OA Subcommittee Leads: Erin Johansson and Chris Maclarion

ACA Subcommittee Spokespersons: Erin Johansson

ACA Members from Other Subcommittees: N/A

Year 2 Issue – Quality Standards

Issue and Background:

Registered Apprenticeship is arguably the nation’s premier workforce training system. Since the inception of The National Apprenticeship Act in 1937 employers, unions, associations and workers have utilized the Registered Apprenticeship system to become highly skilled and highly paid employees. However, despite having 85 years as an approved program, Registered Apprenticeship remains largely a “niche” training model predominantly utilized by the construction sector. Addressing occupational segregation is paramount to improving the success of Registered Apprenticeship and to implement high quality programs in new industries and occupations. In addition, this expansion will help to further promote inclusiveness for women, individuals with disabilities, and the Asian American, Native Hawaiian, and Pacific Islander communities who are underrepresented in today’s registered apprenticeship system, and to be more inclusive Black and Hispanic apprentices who are underrepresented in higher paying occupations.

Existing guidance from the USDOL OA and SAAs does not provide a comprehensive framework or controlling guidance for the definition of a “Quality Registered Apprenticeship Program.” The Registered Apprenticeship System is poised for dramatic expansion, given both expanded federal and state grants for apprenticeship, as well as the \$4 trillion in new federal funds that could dramatically expand opportunities for registered apprenticeship. The OA and

SAs could play a role in ensuring that our taxpayer investments are maximized, providing successful career outcomes for apprentices and benefits for participating employers. This leads us to ask: “How can we create a standard for a High-Quality Registered Apprenticeship System that benefits all parties and can be rapidly scaled across the nation?”

Strategic Importance of the Priority Issue:

Registered Apprenticeship has seen historic investments in programming, staffing and support for apprentices. In order for these investments to continue it is of critical importance that legislators, taxpayers, businesses, schools, associations and unions receive the maximum impact from the funding and Registered Apprenticeship Programs. These investments must be utilized in a manner which creates not only the most highly skilled workforce but also creates a diverse workforce representative of the communities they are located in. Last, these apprenticeship programs must produce graduates from the program who are able to contribute immediate value adds to participating employers, who in turn are generating career level family supporting wages. Anything less than these outcomes will dilute the value of Registered Apprenticeship and result in a loss of support and funding for expansion.

Recommendations and/or Best Practices:

These investments should continue and as a condition for further funding the programs should be given incentives by the federal government to meet defined quality standards. The USDOL OA should issue a Training and Employment Notice (TEN) or other policy defining Quality Guidelines for RAPs which will be higher than merely complying with 29.29 and 29.30. The OA and SAA’s, through this guidance, could offer RAPs a process for applying to receive a “Quality Seal of Approval” based on the TEN/Guidance. Programs that achieve this Quality Seal would then be maintained on a list of programs that meet these quality standards for the public review. In addition, programs who receive this Quality Seal would be prioritized for preference for federal grants awards. In addition, states could use this framework, should they desire, when awarding state funded grants and/or tax credits. Employers who hire apprentices from a Quality Seal RAP could also be given preference in bidding for and being awarded federal work (e.g. a points system could be allocated for Quality Seal RAP affiliation and NOFOs could include language encouraging the involvement of Quality Seal RAPs).

A Registered Apprenticeship Program must meet the following criteria in order to be deemed as being high quality:

1. Valuable outcomes
 - a. Completion results in an industry-recognized credential in an in-demand occupation that is transferable across multiple employers.
 - i. USDOL OA should reinstate the national completion averages for occupations. This should be calculated yearly AND calculated retroactively back to 2010 to create an immediate completion baseline.

- ii. USDOL OA, with consultation with the SAAs, should include variables for occupations impacted by events such as weather and technology. (Example: roofers and bricklayers.)
 - b. Industry-recognized interim and stackable credentials provided.
 - i. Licenses should be factored in where applicable
 - ii. Certifications should be factored in where applicable
 - c. Programs with high completion percentages in which the journey-level wages are family-sustaining wages with benefits, allowing one adult to support 2 children, according to the [MIT living wage calculator](#).
 - i. USDOL OA and the SAA's should require comprehensive sharing of hourly wages. If a state declines to participate they should not be included in federal grant funding for RAP's. Wage information can be supplied by participating states through wages of apprentices upon completion of their apprenticeship through RAPIDS or through a state's internal apprenticeship data management system.
 - ii. USDOL OA and the SAA's should require wage verification as part of the Quality and Compliance Review process. These results should be included as part of a wage study conducted by USDOL where applicable for grants and other USDOL/SAA studies.
 - d. The program graduates at a minimum of 75% all apprentices once the probation period is completed.
- 2. Transparency for apprentices
 - a. Programs are required to provide apprentices with a copy of the Standards of Apprenticeship AND a copy of their Apprenticeship Agreement. Programs found to not be in compliance would not be eligible for the Quality Seal and should receive technical assistance and/or deregistration. Programs are encouraged to provide each apprentice with a one page fact sheet to help ensure the apprentice understands the:
 - i. Defined length of time of program and the skills, knowledge and abilities needed to advance and graduate.
 - ii. Clear and standardized wage progression.
 - iii. Expectations of all aspects of the program
- 3. Diversity of participants
 - a. Programs demonstrate that their current apprentices reflect the racial, ethnic and gender diversity of their communities.
 - b. If a program does demonstrate this diversity, it can show year-over-year progress towards racial, ethnic, and gender diversity goals.
 - c. Graduation rates are not differentiated by race, ethnicity and gender.
- 4. Worker voice
 - a. Workers (apprentices and journeypersons) have opportunities to voice workers' (non-management employees) concerns, feedback on safety, training, program expectations, curricula, etc. with respect to apprenticeship programs in which they participate. If they are not represented by a union, this collective feedback process must be spelled out. For instance, an employer, industry group or community

college could maintain an ongoing committee of apprentices and journey persons that provides input on the sponsor's RAP.

- b. A process is in place for an apprentice to appeal any decisions regarding their participation in the program.
5. Ratios
 - a. A ratio in hazardous occupations should be maintained at a minimum of 1 apprentice to 1 journeyworker, at minimum, to ensure the safety of the apprentice, journeyworker and public as outlined in Circular 2021-02.
 - b. A ratio in non-hazardous occupations should occur at a ratio of 1:1 until the sponsor can demonstrate the safety of the apprentice, journeyworker and public, as applicable, and a high completion rate for the apprentices.
 - c. Deviations for the above should be consistent with USDOL Circular 2021-02 and/or individual SAA/State guidance.
 6. Sector-based strategies
 - a. Programs that demonstrate an involvement in broader sectoral coalitions with strategies and plans for expanding and strengthening registered apprenticeship in a given sector. The RAP operates within a defined and robust ecosystem.
 - b. Sector-based strategies reflect the interests of a range of stakeholders, including industry groups, unions, community-based organizations, and other government agencies.
 7. Compliance:
 - a. Programs who do not meet the minimum requirements during the Compliance/Quality Review process should have that designation noted on a Quality Seal RAP created by the USDOL OA and maintained on their site.