



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF CAREER, TECHNICAL, AND ADULT EDUCATION

### Program Memorandum OCTAE 23-1

**DATE:** February 28, 2023

**TO:** State Directors of Career and Technical Education

**FROM:** Amy Loyd, Ed.L.D. /s/  
Assistant Secretary

**RE:** Registered Apprenticeship Programs and Career and Technical Education

#### Purpose

The purpose of this memorandum is to affirm that funds available under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act (Perkins V), may be used to develop, improve, and support Registered Apprenticeship (RA) programs that are part of the national apprenticeship system authorized by the National Apprenticeship Act of 1937 (29 U.S.C. 50 et seq.) and its implementing regulations (Title 29 C.F.R. Part 29, Subpart A), as well as their prerequisite pre-apprenticeship programs.

RA programs are an important engine of economic mobility that build technical and employability skills through classroom instruction, paid work-based learning under the supervision of a mentor, and wages that increase as participants gain skills and experience. Time-based RA programs are usually tuition-free and last about 4 years, depending on the employer or occupation, although they may take as little as 12 months or as many as 6 years.<sup>1</sup> RA programs may also be offered using a competency-based model or a hybrid model that applies both time and competency. Apprentices who complete an RA program receive a national certificate that is valued by employers across the United States, have a 93% retention rate with their employer and earn, on average, an annual starting salary of \$77,000.<sup>2</sup> RA programs are offered in a variety of industries and over 1,000 apprenticeable occupations.<sup>3</sup> RA programs for high-school-age youth are sometimes described as “youth apprenticeships.”<sup>4</sup>

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<sup>1</sup> Torpey, E. and Farrell, R. (2019), “Apprenticeships: Outlook and wages in selected occupations,” *Career Outlook*. U.S. Bureau of Labor Statistics. Retrieved from: <https://www.bls.gov/careeroutlook/2019/article/apprenticeships-outlook-wages-update.htm>

<sup>2</sup> U.S. Department of Labor, Employment and Training Administration (n.d.), Apprenticeship USA: Explore Registered Apprenticeship. Retrieved from: <https://www.apprenticeship.gov/sites/default/files/dol-industry-factsheet-apprenticeship101-v10.pdf>

<sup>3</sup> U.S. Department of Labor, Employment and Training Administration (n.d.), *Building Registered Apprenticeship Programs: A Quick-Start Toolkit*. Retrieved from: [https://www.doleta.gov/oa/employers/apprenticeship\\_toolkit.pdf](https://www.doleta.gov/oa/employers/apprenticeship_toolkit.pdf)

<sup>4</sup> Boren, Z. et al. (2021), *Youth Apprenticeship Playbook*, the Urban Institute. Retrieved from: <https://www.urban.org/sites/default/files/publication/105029/youth-apprenticeship-playbook.pdf>

While Perkins V does not use the term “Registered Apprenticeship,” RA programs are consistent with the law’s definition of “career and technical education” (CTE). As shown in the table which compares RA program components described in the implementing regulations for the National Apprenticeship Act of 1937 with components of the definition of “CTE” in Perkins V, RA programs include classroom instruction (“related instruction”) that provides “the apprentice with the knowledge of the theoretical and technical subjects related to the apprentice’s occupation,” “on-the job learning,” and the opportunity to earn a “recognized postsecondary credential,” all three of which are key components of the Perkins V definition of CTE.

<b>Registered Apprenticeship Components</b>	<b>Perkins V Definition of CTE</b>
A recommended minimum of 144 hours per year of “related instruction,” <sup>5</sup> which is “an organized and systematic form of instruction designed to provide the apprentice with the knowledge of the theoretical and technical subjects related to the apprentice’s occupation.” <sup>6</sup>	“Organized educational activities” <sup>7</sup> that “offer a sequence of courses” that “provides individuals with rigorous academic content and relevant technical knowledge and skills needed to prepare for further education and careers in current or emerging professions, which may include high-skill, high-wage, or in-demand industry sectors or occupations.” <sup>8</sup>
On-the-job learning, which must comprise at least 2,000 hours per year in time-based RA programs or subsequently be the equivalent of such competency should the program be a competency-based RA program or be delivered through a combination of the two approaches (RA hybrid programs). <sup>9</sup>	Includes “competency-based, work-based, or other applied learning.” <sup>10</sup>
Provides a national certificate of apprenticeship completion. <sup>11</sup>	Provides “technical skill proficiency or a recognized postsecondary credential,” <sup>12</sup> which is defined as “a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree.” <sup>13</sup>

<sup>5</sup> 29 C.F.R. § 29.5 (b)(4)

<sup>6</sup> 29 C.F.R. § 29.2

<sup>7</sup> Perkins V section 3(5)

<sup>8</sup> Perkins V section 3(5)(A)(i)

<sup>9</sup> 29 C.F.R. § 29.5 (b)(2)

<sup>10</sup> Perkins V section 3(5)(B)

<sup>11</sup> 29 C.F.R. § 29.2

<sup>12</sup> Perkins V section 3(5)(A)(ii)

<sup>13</sup> Perkins V section 3(43) and section 3(52) of the Workforce Innovation and Opportunity Act.

Pre-apprenticeship programs that provide individuals with rigorous academic content and build technical skill proficiency to prepare them to succeed in RA programs constitute “prerequisite courses” as contemplated by the Perkins V definition of CTE.<sup>14</sup> Quality pre-apprenticeships play a critical role in preparing individuals to succeed in RAs through at least one partnership with a RA program and a combination of simulated experience, connection to supportive services, and aligned classroom instruction. Pre-apprenticeship is also a successful strategy to increase diversity in RA programs by recruiting and preparing underrepresented populations to be successful in RA.<sup>15</sup>

Consequently, states may use Perkins V state leadership funds to develop, improve, and support RA programs, and their components and prerequisites. Subrecipients may also use Perkins V funds to develop, coordinate, implement, or improve RA programs and their components and prerequisites provided that these programs are sufficient in “size, scope, and quality to be effective” as determined by the state,<sup>16</sup> address needs identified in the biennial comprehensive local needs assessment required by section 134(c),<sup>17</sup> and meet other applicable requirements of Perkins V. For example:

- A state may use state leadership funds to support the development and expansion of youth apprenticeship, pre-apprenticeship and RA programs aligned to state and local economic and education needs that begin in high school.<sup>18</sup>
- A state may use state leadership funds available to support preparation for non-traditional fields to recruit women and girls to participate in RA programs in careers like electrician and software developer in which women are underrepresented.<sup>19</sup>
- A state may use leadership funds to partner with a qualified intermediary organization with expertise in apprenticeship to help develop and scale RA programs throughout the state.<sup>20</sup>
- A state may use leadership funds to connect pre-apprenticeship and RA programs with related 2-year degree programs<sup>21</sup> or to bridge RA and degree programs by supporting an evaluation by college faculty or other experts of the learning and experience that apprentices receive to identify college credit equivalencies that may be eligible to transfer to degree and certification programs at institutions of higher education.<sup>22</sup>
- A state may use reserve funds available under section 112(a) of Perkins V to award subgrants in eligible areas of the state to incentivize the development of RA programs that bridge secondary and postsecondary CTE systems.<sup>23</sup>

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<sup>14</sup> Perkins V section 3(5)(A)(iii).

<sup>15</sup> See U.S. Department of Labor (2012), *Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources* (Training and Employment Notice No. 13-12). Retrieved from: <https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-13-12>

<sup>16</sup> Perkins V section 135(b).

<sup>17</sup> Perkins V section 135(a).

<sup>18</sup> Perkins V section 124(b)(4).

<sup>19</sup> Perkins V section 124(a)(1)(A).

<sup>20</sup> Perkins V section 124(b)(13).

<sup>21</sup> Perkins V section 124(b)(8)(A).

<sup>22</sup> Perkins V section 124(b)(20).

<sup>23</sup> Perkins V section 112(c). Eligible areas are rural areas, areas with high percentages of CTE concentrators or CTE participants, areas with high numbers of CTE concentrators or CTE participants, areas with disparities or gaps in performance.

- A community college may use Perkins V funds for curriculum and professional development and other expenses associated with developing the “related instruction” component of an RA program and integrating it within a certificate or associate degree program so that RA participants earn college credit when they complete the RA.<sup>24</sup>
- A local educational agency (LEA) may use Perkins V funds to pay the out-of-pocket expenses associated with participating in an RA, such as books, tools, childcare, and transportation, for students who are members of special populations,<sup>25</sup> such as individuals from economically disadvantaged families and single parents.<sup>26</sup>
- An LEA may use Perkins V funds to strengthen its career guidance and academic counseling program by developing and delivering to students and their families information about RA opportunities and how to pursue them.<sup>27</sup>
- An LEA may use Perkins V funds to support programs and activities that increase access and success in RAs focused on science, technology, engineering, and mathematics fields for students who are members of groups underrepresented in these fields, such as women and students of color.<sup>28</sup>

The Office of Career, Technical, and Adult Education (OCTAE) has and will continue to support states and local practitioners in their efforts to provide pre-apprenticeship, youth apprenticeship, and RA opportunities to secondary and postsecondary CTE students. In 2018, OCTAE used Perkins V national activities funding for 6 state grants under the “[Pathways to STEM Apprenticeship for High School Career and Technical Education Students](#)” demonstration program. The 6 states—Kentucky, Maryland, Nebraska, Oregon, Rhode Island, and Tennessee—used their funds to expand and improve the transition of high school CTE students to postsecondary education and employment through apprenticeships in science, technology, engineering, and mathematics (STEM) fields, including computer science, that begin during high school. The Maryland Department of Education, for example, used its grant to expand Apprenticeship Maryland from a pilot program developed in counties to a statewide model through subgrants to LEAs and community colleges. Participating students start Apprenticeship Maryland in their junior year and complete at least 1 year of related classroom instruction and a minimum of 450 hours of paid work-based learning under the supervision of an RA sponsor.<sup>29</sup> Another grantee, the Kentucky Department of Education, used its grant to enhance and expand the Tech Ready Apprentices for Careers in Kentucky (TRACK) youth apprenticeship program, which it administers in partnership with the Kentucky Office of Apprenticeship, to provide high school students with career pathway opportunities into RA programs. Students enter TRACK in their junior year and take CTE courses selected by the RA employer sponsor and participate in work-based

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<sup>24</sup> See Perkins V sections 135(b)(2) and (5).

<sup>25</sup> Perkins V section 135(b)(5)(S).

<sup>26</sup> Section 3(48) of Perkins V defines the term “special populations” to mean “individuals with disabilities; individuals from economically disadvantaged families, including low-income youth and adults; individuals preparing for non-traditional fields; single parents, including single pregnant women; out-of-workforce individuals; English learners; homeless individuals described in section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); youth who are in, or have aged out of, the foster care system; and youth with a parent who is a member of the armed forces (as such term is defined in section 101(a)(4) of title 10, United States Code) and is on active duty (as such term is defined in section 101(d)(1) of such title.”

<sup>27</sup> Perkins V section 135(b)(1).

<sup>28</sup> Perkins V section 135(b)(5)(M).

<sup>29</sup> Maryland Department of Education (2022), “Apprenticeship Maryland: Earn and Learn Opportunities for Youth.”

Retrieved from:

[https://marylandpublicschools.org/programs/Documents/CTE/ApprenticeshipMD/Apprenticeship\\_Maryland\\_flier\\_education\\_06-2022.pdf](https://marylandpublicschools.org/programs/Documents/CTE/ApprenticeshipMD/Apprenticeship_Maryland_flier_education_06-2022.pdf)

learning. Upon high school graduation, TRACK participants may continue their training with the employer sponsor, applying up to 50 percent of their classroom and work-based learning time toward the requirements of the RA.<sup>30</sup>

Secondary and postsecondary educators interested in learning more about RA and their prerequisite pre-apprenticeship programs can find a variety of resources on the U.S. Department of Labor's [Apprenticeship.gov](https://www.dol.gov/apprenticeship) website, including examples of successful RA programs launched by or in partnership with LEAs and community colleges.

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<sup>30</sup> U.S. Department of Education, Office of Career, Technical, and Adult Education (2016), *Connecting Secondary Career and Technical Education and Registered Apprenticeship: A Profile of Six State Systems*. Retrieved from: [https://s3.amazonaws.com/PCRN/reports/Connecting\\_Secondary\\_CTE\\_and\\_Registered\\_Apprenticeship.pdf](https://s3.amazonaws.com/PCRN/reports/Connecting_Secondary_CTE_and_Registered_Apprenticeship.pdf)