
ADVISORY COMMITTEE ON APPRENTICESHIP
Biennial Report to the Secretary of Labor

May 10, 2023

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Executive Summary

Following from President Joe Biden's February 2021 announcement that the U.S. Department of Labor (USDOL) would reestablish the Advisory Committee on Apprenticeship (ACA or the Committee), the Department issued a notice of intent to reestablish the Committee and requested member nominations.¹ From this call for nominations, the Department appointed a diverse committee of 29 members, representing employers, labor organizations, and members of the public.²

At the outset, the Committee agreed to divide into four Subcommittees, considering apprenticeship-related issues relevant to their respective focus areas and producing recommendations for USDOL to be voted on in the full Committee meetings. The Apprenticeship Modernization Subcommittee focused on approaches to improve and streamline the apprenticeship program development and registration processes. The Increasing Diversity, Equity, Inclusion, and Accessibility (DEIA) Subcommittee considered how USDOL can increase access, engagement, participation, and persistence in apprenticeship programs among underserved and underrepresented communities. The Industry Engagement in New and Emerging Sectors (IENES) Subcommittee studied strategies to increase business and labor engagement and adoption of apprenticeship in new and emerging industries that critically need skilled workers. And finally, the Apprenticeship Pathways Subcommittee looked at how to improve and expand pre-apprenticeship and youth apprenticeship programs as on-ramps to Registered Apprenticeship.

Since its inception, the Committee has held seven public meetings, remotely and in cities across the United States, occurring between October 6, 2021, and May 10, 2023.³ At these meetings, the Committee discussed and debated the work of the Subcommittees, engaged with apprenticeship stakeholders, received reports from Federal officials from other Departments on apprenticeship-related initiatives, and heard directly from apprentices themselves. In addition to these public meetings, during its first year, the Committee developed an Interim Report to the Secretary of Labor, as directed by its charter, which the Committee approved by a vote at its third meeting, on May 16, 2022. The May 2022 Interim Report consisted of 147 recommendations for ways USDOL can improve and expand the Registered Apprenticeship system. The Committee's May 2022 Interim Report forms the basis of this Biennial Report to the Secretary of Labor.

¹ Notice of Intent to Reestablish the Advisory Committee on Apprenticeship (ACA) Charter and Request for Member Nominations, 86 FR 23741 (May 4, 2021).

² U.S. Department of Labor, ApprenticeshipUSA, "Advisory Committee on Apprenticeship: Membership," <https://www.apprenticeship.gov/advisory-committee-apprenticeship/membership> (last visited Apr. 30, 2023).

³ U.S. Department of Labor, ApprenticeshipUSA, "Advisory Committee on Apprenticeship: Meetings," <https://www.apprenticeship.gov/advisory-committee-apprenticeship/meetings> (last visited May 1, 2023).

In the second year of its charter, the Committee expanded upon the recommendations contained in the May 2022 Interim Report, further exploring some of the issues raised therein and developed a Strategic Framework to Advance Apprenticeship, consisting of broad principles to guide policymaking on apprenticeship. The issue briefs included as addendums to this Biennial Report reflect the issues explored by the Subcommittees in greater detail during the second year of the Committee's charter. In addition, the Committee deliberated whether and how the concept of living wage or family-sustaining wage should factor into the Registered Apprenticeship framework. The Committee voted to send this Biennial Report forward to the Secretary of Labor during its last public meeting on May 10, 2023. The Summary of Final Committee Votes section below reflects the Committee membership votes on a living wage resolution, the Subcommittee issue briefs, and this Biennial Report as a whole. The living wage resolution approved by the ACA is presented in Addendum A. Addendum B details additional Subcommittee perspectives on family-sustaining wages. Additional supplemental materials relating to family-sustaining wages that were submitted by Committee members and members of the public are listed in Addendum C. Addendums D through G reflect the final Subcommittee issue briefs. Finally, the 2021 ACA Charter is reprinted as Addendum H. This Biennial Report represents the culmination of 2 years of hard work by dedicated apprenticeship experts and advocates, and the Committee hopes it will help USDOL fulfill its commitment to expanding Registered Apprenticeship as a means to rebuild the middle class and connect a diverse workforce to good jobs.

Advisory Committee on Apprenticeship Members

ACA Chair

Pam Eddinger, PhD – President, Bunker Hill Community College

Employer Representatives

Noel D. Ginsburg – Founder and CEO, CareerWise Colorado (Employer Co-Chair)

Amy Kardel – Senior Vice President of Strategic Workforce Relationships, The Computing Technology Industry Association (CompTIA)

Carolyn Holmes Lee – Executive Director, The Manufacturing Institute

T. David Long – CEO, National Electrical Contractors Association

Obed D. Louissaint – Senior Vice President and Chief People Officer, Aptiv

Karmela Malone – Senior Vice President of Claims, The Hartford

Timothy Oberg – Assistant Director, Independent Electrical Contractors

Valerie S. Richardson – Director, Talent & Workforce Development, Prisma Health

Labor Representatives

Raymond W. Boyd – Assistant Director of Education and Training, United Association of Journeymen and Apprentices of the Plumbing and Pipe Fitting Industry of the United States and Canada

Daniel Bustillo – Executive Director of the Healthcare Career Advancement Program, Service Employees International Union (SEIU)

John A. Costa – International President, Amalgamated Transit Union AFL-CIO/CLC

Stephanie Harris-Kuiper – Executive Director of the Training and Development Fund District 1199J, American Federation of State, County, and Municipal Employees

William K. Irwin, Jr. – Retired Executive Director, Carpenters International Training Fund

Michael C. Oathout – Director of Safety, & Health, Apprenticeships and Scholarships, International Association of Machinists & Aerospace Workers

Vicki L. O’Leary – General Organizer and Director of Diversity, Ironworkers International

Bernadette Oliveira-Rivera – Assistant Director for Training, Laborers’ International Union of North America (Labor Co-Chair)

Anton P. Ruesing – Executive Director of the International Finishing Trades Institute, International Union of Painters and Allied Trades

Todd W. Stafford – Executive Director, The Electrical Training ALLIANCE

Public Representatives

Todd Berch – President, National Association of State and Territorial Apprenticeship Directors (NASTAD)

Walter G. Bumphus, PhD – President and CEO, American Association of Community Colleges

Erin E. Johansson – Research Director, Jobs with Justice

Donna Lenhoff – Principal, Donna Lenhoff Associates; representing Chicago Women in Trades (CWIT)

Robbie Melton, PhD – Associate Vice President & Graduate Dean, Tennessee State University, Smart Global Technology Innovation Center

Traci R. Scott – Vice President of Workforce Development, National Urban League

Orrian Willis – Senior Workforce Development Specialist, San Francisco Office of Economic & Workforce Development

Randi Wolfe, PhD – Executive Director, Early Care & Education Pathways to Success

Subcommittee and Workgroup Membership

Increasing Diversity, Equity, Inclusion, and Accessibility Subcommittee

Employer	Labor	Public
Rosanna Maietta (Year 1) (delegate: Carrie Alexander (Year 1))	Raymond W. Boyd	Donna Lenhoff
Karmela Malone (delegate: Mark Wagner)	Stephanie Harris-Kuiper	Robbie Melton, PhD (delegate: Michael Torrence)
Valerie S. Richardson	Vicki L. O'Leary	Traci R. Scott (delegate: Kevin Ly)

Apprenticeship Modernization Subcommittee

Employer	Labor	Public
Obed D. Louissaint (delegate: Amanda Vitelli (Year 1))	Michael C. Oathout	Erin E. Johansson
Timothy Oberg	Todd W. Stafford (delegate: Marty Riesberg)	Chris Maclarion (delegate for Todd Berch)

Industry Engagement in New and Emerging Sectors Subcommittee

Employer	Labor	Public
Jonathan S. Adelstein (Year 1) (delegate: Brent Weil (Year 1))	Daniel Bustillo	Randi Wolfe, PhD
Amy Kardel (delegate: Richard Braden)	John A. Costa (delegate: Jamaine Gibson)	Orrian Willis
Carolyn Holmes Lee (delegates: Pooja Tripathi (Year 2); Cassi Zumbiel (Year 1))	Bernadette Oliveira-Rivera	

Apprenticeship Pathways Subcommittee

Employer	Labor	Public
Noel D. Ginsburg (delegate: Meaghan Sullivan)	William K. Irwin, Jr.	Todd Berch
T. David Long (delegate: Jared Karbowsky)	Anton P. Ruesing	Walter G. Bumphus, PhD (delegate: Jennifer Worth)

Ex Officio Federal Workgroup

U.S. Department of Commerce: Kevin Gallagher	U.S. Department of Education: Amy Loyd	U.S. Department of Energy: Amy Peterson
U.S. Department of Health and Human Services: Johnathan J. Gardner	U.S. Department of Housing and Urban Development: Diane Shelley (delegates: Lacia Sommars, Amanda Herrmann Vasquez)	U.S. Department of Transportation: Paige Shevlin (Year 2) Michael Shapiro (Year 1)

Table of Abbreviations

Abbreviation	Term
AA	Associate in Arts
AANHPI	Asian Americans, Native Hawaiians, and Pacific Islanders
AAP	affirmative action plan
ACA or Committee	Advisory Committee on Apprenticeship
Administrator	Administrator of the U.S. Department of Labor's Office of Apprenticeship or any person designated by the Administrator
AJC(s)	American Job Center(s)
APR	Apprenticeship Program Reviews
BA	Bachelor of Arts
BIPOC	Black, Indigenous, and people of color
BLS	U.S. Bureau of Labor Statistics
C2ER	Council for Community and Economic Research
CBO(s)	community-based organizations
CFR	Code of Federal Regulations
CNA(s)	certified nursing assistant(s)
COLI	Cost-of-Living Index
Commerce	U.S. Department of Commerce
CTE	Career Technical Education
CWIT	Chicago Women in Trades
DEIA	diversity, equity, inclusion, and accessibility
DFO	Designated Federal Officer
DOE	U.S. Department of Energy
DOT	U.S. Department of Transportation
EAPR	Extended Apprenticeship Program Review
ECE	Early Care and Education
ED	U.S. Department of Education
EEO	equal employment opportunity
EEOC	Equal Employment Opportunity Commission
E.O.	Executive Order
EPA	Environmental Protection Agency
ERISA	Employee Retirement Income Security Act
ESG	Environmental, Social, and Governance
ETA	Employment and Training Administration
ETP	Eligible Training Provider
FACA	Federal Advisory Committee Act
FMCSA	Federal Motor Carrier Safety Administration
FOA	Funding Opportunity Announcement
FPL	Federal poverty level

Abbreviation	Term
FSW	Family-Sustaining Wage
HBCU	Historically Black Colleges and Universities
HHS	U.S. Department of Health and Human Services
HUD	U.S. Department of Housing and Urban Development
IENES	Industry Engagement in New and Emerging Sectors
IWD(s)	individual(s) with disabilities
IWPR	Institute for Women's Policy Research
JATC	Joint Apprenticeship and Training Committees
LGBTQ+	lesbian, gay, bisexual, transgender, queer, gender nonconforming, and nonbinary individuals
LPN(s)	licensed practical nurse(s)
MOB(s)	minority-owned business(es)
MSI(s)	minority-serving institution(s)
NAA	National Apprenticeship Act
NAW	National Apprenticeship Week
NBER	National Bureau of Economic Research
OA	Office of Apprenticeship
ODEP	Office of Disability Employment Policy
OFCCP	Office of Federal Contract Compliance Programs
OJL	on-the-job learning
OJT	on-the-job training
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration
PCT(s)	patient care technician(s)
POC	people of color
PPE	personal protective equipment
PST(s)	patient services technician(s)
QF	Quality Framework
RA	Registered Apprenticeship
RAP(s)	Registered Apprenticeship program(s)
RAPIDS	Registered Apprenticeship Partners Information Data System
RN(s)	registered nurse(s)
ROI	return on investment
RTI	Related Technical Instruction
SAA(s)	State Apprenticeship Agency(ies)
Secretary	Secretary of Labor
SME	subject-matter expert
STEM	science, technology, engineering, and mathematics
TEN	Training and Employment Notice
UDL	Universal Design for Learning
U.S.C.	United States Code

Abbreviation	Term
USDOL	U.S. Department of Labor
WANTO	Women in Apprenticeship and Nontraditional Occupations
WIOA	Workforce Innovation and Opportunity Act
YTTW	Youth Transition to Work

A Strategic Framework to Advance Apprenticeship

In the second year of its charter, the four ACA Subcommittees each developed strategic pillars for apprenticeship relevant to their respective focus areas. Taken together, these principles form a Strategic Framework to Advance Apprenticeship that provides broader context for the totality of the Committee's recommendations, as well as a future roadmap for expanding, diversifying, and modernizing Registered Apprenticeship.

Increasing Diversity, Equity, Inclusion, and Accessibility

- **DEIA is essential to developing a high-performing workforce drawn from all segments of American society** and needs to be fully embedded into all aspects of the Registered Apprenticeship and pre-apprenticeship ecosystem, a system that must use data to ensure DEIA and be free from systemic bias and all discrimination, bullying, harassment, and intimidation.
- **Registered Apprenticeship needs to address occupational segregation**, creating pathways and opportunities for America's increasingly diverse workforce to develop the skills needed to connect with good jobs with family-sustaining wages and wrap-around services, while meeting industry demand.

Industry Engagement in New and Emerging Sectors

- **Given the wide and diverse range of new and emerging sectors**, and the distinguishing and unique characteristics among them, it is essential that the Registered Apprenticeship system accommodate their differences without compromising the rigor and quality of the existing system.
- **To make Registered Apprenticeship accessible to and inclusive of new and emerging sectors**, which would help ensure a more equitable future for the country, USDOL will need to address four areas: branding and perception; incentives; standards and systems building; and sector-specific differences.

Apprenticeship Modernization

- **The Registered Apprenticeship system is the gold standard of workforce development because of its high-quality provisions in labor standards.** OA should strengthen core quality elements—such as outcome- and data-driven decision-making, transparency and safety for apprentices, DEIA principles, strong worker voice, commitments to the safety of apprentices, and oversight/compliance—and link quality standards to Federal procurement vehicles and Federal funding opportunities.
- **Apprenticeship's value far exceeds its uptake, representing only 0.3 percent of the labor force despite its long history of success.** OA should take steps to build

partnerships, technological enhancements, and data to bring information and awareness of the power of apprenticeship to job seekers, employers, students, and parents.

- **OA should work with employers, labor-management groups, and industry leaders to ease the entry point to Registered Apprenticeship.** Ease of access should be comparable to the traditional college/university job recruitment on-ramps. OA should simplify and modernize the administrative processes for starting a new RAP; recruiting, hiring, and onboarding apprentices; and collecting and analyzing apprenticeship data.

Apprenticeship Pathways: Pre-Apprenticeship, Youth Apprenticeship, and Degree Apprenticeship

- **Successful pathways into apprenticeship require integration into the secondary and post-secondary education systems;** recognition as having equal validity to other methods of skill attainment and career advancement; widespread stakeholder support; and linkages to high-quality, fulfilling, and safe jobs in workplaces that embrace diversity and promote equity, inclusion, and accessibility.
- **Apprenticeship pathways are a smart investment:** for employers, they yield a competitive advantage and return on investment (ROI); for participants, they are an options multiplier and a post-secondary education option; and they also provide a direct on-ramp to Registered Apprenticeship, a proven workforce development strategy.

Summary of Final Committee Votes

At the May 10, 2023 public meeting, the Committee voted on a living wage resolution, issue papers submitted to the ACA by each Subcommittee, and whether to send the contents of this Biennial Report forward to the Secretary of Labor. The vote counts for each of these major votes are presented below. Please see the published meeting minutes for additional details regarding each vote.⁴

Vote #1 – Living Wage Resolution and Explanatory Statement

Item:	Approve	Disapprove	Abstain
Living Wage Resolution	17	7	2

Vote #2 – Issue Papers

Item:	Approve	Disapprove	Abstain
DEIA Issue Paper	24	1	1
Pathways Issue Paper	25	1	0
IENES Issue Paper	26	0	0
Modernization Issue Papers (Marketing, Onboarding Programs, Quality Standards)	21 ⁵	3	2

Vote #3 – Biennial Report

Item:	Approve	Disapprove	Abstain
Biennial Report Outline (Plus the Approved Issue Papers)	25	1	0

⁴ U.S. Department of Labor, ApprenticeshipUSA, “Advisory Committee on Apprenticeship: Meetings,” <https://www.apprenticeship.gov/advisory-committee-apprenticeship/meetings> (last visited May 1, 2023).

⁵ Three members voted to approve the three Modernization Subcommittee issue papers, *except that* they dissented/disapproved of the quality badge component of the Quality Standards issue paper.

May 2022 Interim Report

Message from Chair and Co-Chairs

On February 17, 2021, President Joe Biden announced that the U.S. Department of Labor (USDOL) would reestablish the Advisory Committee on Apprenticeship (ACA or Committee) after several years of inactivity. The ACA is authorized by the National Apprenticeship Act (NAA), 29 U.S.C. 50a, which permits the Secretary of Labor (Secretary) to appoint a national advisory committee to serve without compensation. The ACA is a discretionary Committee established by the Secretary in accordance with the provisions of the Federal Advisory Committee Act (FACA), as amended, 5 U.S.C., App. 2, and its implementing regulations (41 CFR 101-6 and 102-3).

The ACA has been in existence for over 80 years and has historically examined and set forth recommendations on a range of issues since its inception, including policy ideas for expansion, policy and regulatory reform, and broadening participation to include all members of our community. The ACA relaunch, as envisioned by President Biden, has held true to this original vision, and continues to ensure “that the voice of workers” contributes to the “development of strategies to rebuild the economy of the future.”

Heeding the call of President Biden, Secretary Martin J. Walsh began the rebuilding of the ACA on [May 4, 2021](#), with a call for committee nominations and the shaping of a future-looking agenda for the convenings. Secretary Walsh recognized the profound impact Registered Apprenticeship has had on workforce development in the skilled trades and signaled the urgent need to apply this proven strategy for talent development in new and emerging fields. The ACA has been asked to examine our current Registered Apprenticeship systems and practices, to consider the jobs of the future, to uplift historically underrepresented communities, and to offer recommendations to remake apprenticeships for the new century.

On September 15, 2021, the Secretary appointed [29 members](#) to the ACA, comprising leaders in industry/business, labor, and the public sector. Anchored by a Chair and two Co-Chairs from labor and industry/business, and supported by the staff of the Office of Apprenticeship (OA), the ACA, its four Subcommittees, and the Ex Officio Federal Workgroup will serve for a period of 2 years. The outcomes of Committee deliberation are: (1) a preliminary report and recommendations 6 months from the Committee’s inception, on May 16, 2022; and (2) a final report and recommendation by the end of the Committee’s service.

This Interim Report represents the first of the two milestones of the ACA’s work. The ACA shared the progress of its Subcommittees in the first 6 months through three open meetings on October 6, 2021, January 26, 2022, and May 16, 2022. The consultative process within the ACA Subcommittees included sharing early findings and initial recommendations, with feedback widely encouraged from all ACA members.

The Subcommittees and Workgroup of the ACA reflected the forward-thinking nature and the key levers of apprenticeship expansion. The structure and the guiding questions posed to the four Subcommittees signaled the conceptual framework of the revitalization. The Subcommittees and Workgroup are:

1. Increasing Diversity, Equity, Inclusion, and Accessibility (DEIA)
2. Apprenticeship Modernization (Modernization)
3. Industry Engagement in New and Emerging Sectors (IENES)
4. Apprenticeship Pathways: Pre-Apprenticeship, Youth Apprenticeship, and Degree Apprenticeship (Pathways)
5. Ex Officio Federal Workgroup, with representation from the U.S. Departments of Commerce (Commerce), Education (ED), Energy (DOE), Health and Human Services (HHS), Housing and Urban Development (HUD), and Transportation (DOT).

The Ex Officio Federal Workgroup convened to discuss how the executive departments they represent might assist USDOL as it proceeds with implementation of the ACA's recommendations.

In this Interim Report, each one of the four Subcommittees included in its respective section: (1) the identification of priority issues related to its topic; (2) background and guiding questions addressing the issues; and (3) best practices and recommendations.

This Interim Report and the accompanying source materials generated by the ACA will serve as the foundation on which to build a more detailed Final Report over the remainder of the ACA term of service.

In the remainder of this introductory section, you will find an executive summary of the Interim Report, a list of ACA members by sector, a breakout of Subcommittee and Workgroup membership, and a list of acronyms and abbreviations used in the Interim Report.

I am grateful for the clarion vision of President Biden and Secretary Walsh in calling for a reimagining the system of Registered Apprenticeship, the dedication and diverse perspectives of the ACA members, and the expertise of OA leadership and staff in supporting this critical work. In uniting Work, Earn, and Learn, we see a brighter and more equitable future.

Pam Eddinger, PhD

Chair, ACA

President, Bunker Hill Community College

Noel D. Ginsburg

Co-Chair, ACA

CEO, Intertech Plastics

Bernadette Oliveira-Rivera

Co-Chair, ACA

Assistant Director for Training, Laborers' International Union of North America

Executive Summary

The potential for Registered Apprenticeship programs (RAPs) to accelerate workforce preparation for the next decades is dependent on our ability to apply the lessons of the past to emerging industries and sectors not traditionally served by apprenticeships. In the course of this transformation, we are ever mindful that historically excluded populations and communities must have full access to the valuable experiences and opportunities of RAPs across all industries. The diversity and cultural assets of a fully inclusive apprenticeship program will contribute to the depth and the agility of our future workforce.

In assessing the readiness of the Registered Apprenticeship system to meet the changing nature of work, the emergence of new industries, and worker needs, particularly those of historically excluded populations, the ACA also examined the current structure and processes. There is a shared desire across the Subcommittees for more efficient processes that allow for quicker worker and employer engagement, more timely training programs and wraparound learner support, and more resources and incentives for diversity, equity, inclusion, accessibility, sustainability, and growth for the next iteration of Registered Apprenticeship.

The summary of the discussions and recommendations from the four Subcommittees below provides a context for the more detailed discussions within the report. These early recommendations, which the ACA will build on in its Final Report, also outline policy changes that USDOL must consider as it iterates what is already an excellent program into its logical expansion.

Increasing Diversity, Equity, Inclusion, and Accessibility

Three essential questions frame how to advance DEIA in the current Registered Apprenticeship system: Is equity embedded at the heart of the overall Registered Apprenticeship ecosystem and throughout its processes? Do companies and industries view RAPs as a key strategy to achieve equity goals and develop a workforce that reflects and has the cultural competence to meet the needs of America's increasingly diverse communities? Finally, is Registered Apprenticeship accessible to and supportive of all communities, including populations historically underrepresented in Registered Apprenticeship, or are there significant barriers preventing full participation in apprenticeship opportunities?

The findings of the Subcommittee are sobering, and its recommendations far-reaching. They signal a need to shape future policies and incentives to ensure equity of opportunity in order to tap into and unleash the strengths and talents of people from all backgrounds -- thus future-proofing the nation's workforce. USDOL recognizes that diversity is one of America's defining strengths and has among its goals: to develop a high-performing workforce drawn from all segments of American society; to cultivate a culture that encourages collaboration, flexibility, and fairness to enable individuals to contribute to their full potential; and to institutionalize diversity and inclusion as a key strategic priority.

Commitment to DEIA should not be a standalone concept or afterthought, but a fundamental value that drives policies and operation. Apprenticeships, pre-apprenticeships, and wrap-around support services should serve as ways of screening people in, not out. While occupational segregation persists in the overall economy, especially among women and communities of color most impacted by the coronavirus disease of 2019 (COVID-19), Registered Apprenticeship can be a powerful workforce development tool to increase awareness of career options and provide intentionally designed career pathways to highly skilled, in-demand occupations with family-sustaining wages.

Too many are left out of the transformational opportunities that apprenticeships provide. To address this problem, the Subcommittee makes a number of recommendations; among them are that:

- RAPs should reach out to members of underrepresented communities where they live or work through targeted communication channels, one-stop navigation of available resources, and marketing campaigns that feature diverse spokespersons, languages, and concrete benefits for both employers and potential applicants.
- RAPs should create a culture of inclusion through cohorts using the “buddy” system, diverse mentors and trade representation, and development of a national alumni platform.
- RAPs should use equity metrics to track progress towards specific goals based on location, industry, education/skills, and wages/career path, and to inform data-driven decision making.

Apprenticeship Modernization

The discussions and recommendations emerging from the Apprenticeship Modernization Subcommittee spanned a wide scope, from the necessary expansion of the characteristics of apprenticeship to support a new generation of RAPs, to the need for clarity in the evolution of the national Registered Apprenticeship ecosystem, and the development of a new narrative that emphasizes the immense value of apprenticeships.

The expansion of RAPs into industries such as Information Technology, Health Care, and Clean Energy has brought to the forefront new considerations on patterns of learning and core standards. These include time-on-task vs competencies, interim credentials for skills-building, the role of remote learning, and industry-wide and nationally accepted training standards. The holistic view in establishing RAPs for new industries also prevents the “splintering” of current RAPs, preserving effective programs already operating in the ecosystem. To ensure coherence and engagement of all stakeholders in this vision, the Subcommittee proposes to study these new developments and examine the possibility of a hybrid model of learning and assessment that better meets the needs of employers and apprentices in the next decade.

The workforce demands of the labor market continue to change, and so the collaborative relationships within the ecosystem must adapt in order to thrive. The Subcommittee urges a re-examination of 29 CFR parts 29 and 30, which define RAPs, to further ensure and embed the high-quality standards associated with Registered Apprenticeship. The Subcommittee also discussed ways to enhance, reorient, and affirm the relationships among Registered Apprenticeship's key stakeholders, including USDOL, OA, State Apprenticeship Agencies (SAAs), industries, intermediaries, sponsors, training and higher education providers, employers, and apprentices.

The Subcommittee also urged deep intentionality in building the resources necessary to usher in the next generation of RAPs. The braiding of funding across Federal agencies to incentivize the use of apprentices on large-scale projects is one such strategy; building apprenticeship participation requirements into Federal contracts is another.

The multi-faceted impact of technology and data in the modernization of RAPs surfaced repeatedly in this discussion: from the future of remote learning and access, the development of tools and templates, the utility of a Client Relationship Management System, the establishment of a national dataset for performance reporting and continuous messaging to the field, to an agile portal for potential apprentices and employers. Technology is not only a target industry for RAPs, but the information management infrastructure that supports the growth of the ecosystem. Resources and deliberate planning are critical as we move forward.

Finally, the modernization of a system is reflected in the language and aspirations of its participants. Associating Registered Apprenticeship with concepts such as "earn and learn," "career," "degrees and stackable credentials," and communicating continuous advancement broadens the view of job seekers. The Registered Apprenticeship ecosystem as a whole should communicate to school counselors and job coaches that RAPs and pre-apprenticeship programs *are* higher education and open doors to bright futures.

Industry Engagement in New and Emerging Sectors

The expansion of RAPs into new and emerging sectors provides the immediate benefit of meeting urgent workforce needs. The Subcommittee focused on two fast-growing areas that align well with RAP expansion. The Care Economy, which encompasses childcare, early education, and healthcare, is one of the fastest growing employment sectors with a demand for labor. Likewise, the Technology sector faces occupation-specific workforce demands in information technology, biomedical, and environmental sciences, as well as general training requirements in digital literacy across a majority of apprenticeship programs.

In meeting the needs of these emerging and nontraditional sectors, the Subcommittee advocates for the development of industry-wide and nationally accepted training standards to guide RAP scaling. Strong examples include the Construction Trades Occupational Skills Standards; the National Institute for Metal Working Skills; the Building Trades Multi-Craft Core

Curriculum; as well as international models such as Canada's Red Seal Program. The Subcommittee believes we must create a standards-based national system that reflects the context of the new industries.

The Subcommittee points to the importance of inclusion in designing the eligibility standards for these new RAPs, to ensure wide access for traditionally underrepresented workers such as women, people of color, low-wage workers, and care-economy workers. The Subcommittee calls for the establishment of national/regional industry associations and consortia of technology or technology-enabled companies to collect and analyze labor-market information. It also supports the use of proven national/regional intermediaries and provides them with resources and technical support to meet the demands for RAPs in these high-growth and nontraditional emerging sectors.

As part of the efforts to grow RAPs, the Subcommittee also urges USDOL to strengthen the narrative of Registered Apprenticeship. It calls for a clear articulation of the Registered Apprenticeship pathway, from entry to career placement. It envisions apprenticeships and pre-apprenticeships connected to public education, workforce development, and labor-management training systems to enhance service and opportunity for workers. To achieve this, USDOL would review existing policies related to the development and approval of Registered Apprenticeship standards, the determination of apprenticeable occupations, and the allocation of resources. The Subcommittee also asks USDOL to review national and regional RAPs that have splintered over time, and to reconcile them to one national standard or template. The review and renewal process would yield a more coherent system that is facile and transparent for employers and apprentices alike.

Apprenticeship Pathways: Pre-Apprenticeship, Youth Apprenticeship, and Degree Apprenticeship

There is agreement in the field that youth apprenticeships, pre-apprenticeships, and degree apprenticeships are effective on-ramps to Registered Apprenticeship. Individuals exploring careers emerge from these programs committed to entering RAPs, and employers find them better prepared earlier, ready to fill middle-skill jobs. Excellent examples of the youth apprenticeship model include YouthBuild, Job Corps, Career Technical Education (CTE) Centers, and a variety of Workforce Innovation and Opportunity Act (WIOA) youth programs.

With pre-apprenticeships, the pairing of work-based learning with didactic instruction is a winning combination; the attainment of competencies in math, English, and digital literacy, among other subjects, carry long-term benefits of critical thinking and job satisfaction. The college credits accumulated in pre-apprenticeship also become building blocks to further education as the apprentice advances in the field. The barriers to entry are also lower because colleges negotiate collaborative agreements with employers to ensure a smooth transition into RAPs and the workplace. It is important to note that the Federal Government does not place any

age or experience restrictions on participation in pre-apprenticeship, and it is an excellent equity tool as we attempt to diversify our workforce.

Despite the high value of youth apprenticeships and pre-apprenticeships in flexibility and local control, however, the programs are often uneven across the landscape. They lack a uniform definition, regulations, data collection, and metrics for quality control and accountability. Without these prerequisites, it is difficult to formulate programs for expansion and to plan resources for technical assistance. Sustained funding, which is critical for expansion, also depends upon persuasive data and adequate policies and regulations.

Finally, pre-apprenticeship and youth apprenticeship, as well as degree apprenticeship (i.e., credit-bearing apprenticeships), can benefit from a more cohesive vision of a pathway: one that illustrates how and where an individual may enter the apprenticeship pipeline, road signs along the way, and the time and effort required to reach the final destination of a career. The narrative must be developed more fully, and communicated more effectively, that pre-apprenticeship is a viable career pathway with equal dignity to post-secondary education.

Ex Officio Federal Workgroup

Alongside the four ACA Subcommittees, representatives from five Federal agencies were appointed to identify strategies to leverage the deep resources and policymaking role of the Federal Government to dramatically expand Registered Apprenticeship. These agencies are the U.S. Departments of Commerce, Education, Energy, Health and Human Services, Housing and Urban Development, and Transportation. Together, they affect every aspect of American life and work.

The Workgroup members focused their collaborative efforts on the five “Ps”: policy, partnership, procurement, personnel, and programs. Using the purchasing power of government, agencies can incentivize, as well as set, policy regarding the use of apprentices in RAPs for contracts. The Bipartisan Infrastructure Law spending, for example, may carry policy regarding RAPs as an employment and training strategy.

The broadening of Registered Apprenticeship into the areas of energy, health and human services, and transportation likewise invites a national-sector approach to RAPs, highlighting urgent labor-market needs across the country. RAPs might be the answer to urgent workforce needs in trucking, childcare, early education, healthcare, clean energy, telecommunications, and other infrastructure-related jobs. The benefits of opening opportunities to new pools of talent, and yielding a workforce diverse in language, culture, and community is unmatched.

In terms of youth apprenticeship and pre-apprenticeship programming, partnership and policy alignment between USDOL and ED are pivotal in envisioning a seamless and easily accessible pipeline from secondary school and community college to RAPs. The ability for apprentices to earn college credit while fulfilling their RAP requirements also ensures that the building blocks of credit will lead to more advanced training and degrees. One scenario discussed by the

Workgroup imagines a more formal process for recognition of quality pre-apprenticeship programs. Collaboration, rather than competition, would defines the iteration of RAPs within the network of Federal Agencies.

The Road Ahead

The deliberations of the four ACA Subcommittees and the Ex Officio Federal Workgroup are expansive in scope and the forward-thinking in nature, unified by the desire to create a flexible and cohesive national system that would provide guidance at the State and local levels. The 29 members of the ACA, the Federal Workgroup, and the staff of the USDOL Office of Apprenticeship are eager to re-envision a Registered Apprenticeship system that will be responsive for decades to come. The preliminary report and recommendations were 6 months in the making; a Final Report is anticipated in 2023.

Subcommittee Deliberations: Cross Cutting Themes

In their deliberations, the ACA Subcommittees independently identified overlapping issues and arrived at similar, mutually reinforcing recommendations. Indeed, many of the challenges to Registered Apprenticeship cut across the focus areas of the different Subcommittees. The Subcommittees' deliberations recognized these areas of overlap and engaged in important dialogue to identify areas of consensus among the Subcommittees and to ensure consistency in the ACA's recommendations. However, because of the importance of contextualizing recommendations within the specific subjects where they were analyzed, these cross-cutting recommendations have been retained in the sections pertaining to the specific Subcommittees. Doing so was especially important in instances where the different recommendations produced by a Subcommittee support or necessitate one another and thus are more coherent when read together as a whole.

Nonetheless, the recurrence of recommendations from the independent deliberations of different Subcommittees highlights their centrality to the improvement and expansion of Registered Apprenticeship, even where meaningful contexts in Subcommittee-specific sections should still be preserved. In recognition of this fact, listed below are 13 common themes raised by the ACA along with information as to which Subcommittees offered recommendations on those themes. Further, all Subcommittees have identified the need to consider the broad spectrum of apprenticeship stakeholders, including non-governmental entities like sponsors, intermediaries, and others, and how recommendations would impact all players in the ecosystem.

- 1. DEIA: USDOL and SAAs should embed DEIA into the heart of Registered Apprenticeship and pre-apprenticeship programs** and policies as a key strategy both to develop the talents and strengths of America's increasingly diverse communities and to meet industry demand for skilled labor. Doing so would provide opportunities for all to lead and succeed. (DEIA, IENES, Modernization, Pathways)
- 2. Apprenticeship infrastructure:** Congress should provide sufficient resources to increase OA and SAA staffing and infrastructure, to carry out the recommendations of the ACA, and to support the Registered Apprenticeship ecosystem. (IENES, DEIA)
- 3. Pathways to family-sustaining wages:** Wages should be more of a criterion for Registered Apprenticeship than they are at present. RAPs should include intentionally designed career paths that lead to family-sustaining wages based on local living standards. (Modernization, DEIA, IENES)
- 4. Higher education:** USDOL should support outreach to reduce stigmas associated with pursuing apprenticeship rather than higher education alone. (DEIA, IENES, Pathways, Modernization) USDOL also should promote coordination between educational institutions, Registered Apprenticeship stakeholders, and relevant agencies to facilitate the transferability of skills and credits between education curricula and RAPs. (Pathways, IENES, Modernization)
- 5. Agency coordination and collaboration:** USDOL should support better coordination between Federal and State agencies, particularly with respect to promoting consistency

in the structure and requirements of incentives related to Registered Apprenticeship, improving apprenticeship outreach, and facilitating the registration of apprenticeships. (Modernization, IENES)

6. **29 CFR parts 29 and 30 compliance:** USDOL should support and facilitate State adoption of laws consistent with 29 CFR parts 29 and 30, to provide for more consistency in Registered Apprenticeship on the whole and to strengthen the system's DEIA and EEO efforts. (DEIA, Modernization, IENES, Pathways)
7. **Industry and Registered Apprenticeship sponsor engagement and outreach:** USDOL should promote better engagement and outreach with industry groups to ensure that Registered Apprenticeship is responsive to business and worker needs. (Modernization, IENES, DEIA, Pathways)
8. **Defining youth apprenticeship and pre-apprenticeship:** USDOL should provide more guidance on, or a definition for, youth apprenticeship and pre-apprenticeship, building on current Training and Employment Notice (TEN) 13-12, which establishes a framework for defining quality pre-apprenticeship programs. (Pathways, IENES, Modernization)
9. **Gathering and leveraging data:** USDOL should gather more data on Registered Apprenticeship (DEIA, Modernization, IENES, Pathways) and leverage that data to identify priority occupations for RAPs with pathways for apprentices to enter into careers with family-sustaining wages (Modernization, IENES), to promote Registered Apprenticeship and explain its benefits (IENES, DEIA, Modernization, Pathways), and to target USDOL resources (DEIA, Modernization).
10. **Tools, resources, and *apprenticeship.gov*:** USDOL should provide improved tools and resources both to prospective apprentices and other Registered Apprenticeship stakeholders; this includes updating *apprenticeship.gov* to make data more usable and accessible (IENES, Modernization, Pathways, DEIA), providing a directory of incentives and funding available for Registered Apprenticeship (IENES, Modernization), developing a universal tool to support apprenticeship management and tracking (IENES), providing tools for educators to integrate pre-apprenticeship into curricula (Pathways), and improving the Universal Outreach Tool and Demographic Analysis Tool (DEIA).
11. **Improving messaging and outreach:** In addition to the strategies described above, USDOL should focus on improving outreach for Registered Apprenticeship, engaging with prospective apprentice and worker populations (Modernization, DEIA, IENES), and utilizing media such as video and social media to tell apprenticeship stories (IENES, DEIA).
12. **Procurement:** The Federal government should use its buying power to support apprenticeship and diversity in apprenticeships. (IENES, DEIA, Modernization)
13. **OA should identify best practices from other countries** such as the United Kingdom, Germany, Canada, and Switzerland to improve and strengthen the apprenticeship ecosystem. (IENES, Pathways)

Diversity, Equity, Inclusion, and Accessibility

Summary of the Overall Issue Area

RAPs are a powerful workforce development tool to increase diversity, equity, inclusion, and accessibility (DEIA) and combat systemic racism, sexism, and able-ism. RAPs have the potential to transform lives by developing the talents and strengths of the nation's increasingly diverse communities and promoting entrance into meaningful careers and family-sustaining wages based on local living standards. And at the same time, Registered Apprenticeship creates a highly skilled and competitive workforce connected with industry demand.

But too many are left out of the Registered Apprenticeship system and the unique opportunities to "earn-and-learn" it offers. The following are systemic contributing factors: With registered apprenticeships traditionally concentrated in construction and the skilled trades, RAPs apprenticeships have often been, and been perceived as, the domain of white, able-bodied men. The result is that many individuals from underrepresented communities, especially women, people of color (POC), and individuals with disabilities (IWDs), are not aware of apprenticeship opportunities and do not think of them as available to them; often RAP sponsors do not recruit or hire such individuals, at best are not aware of how to recruit them, and at worst are actively hostile to hiring them; Registration Agencies⁶ have not consistently prioritized or enforced DEIA requirements such as 29 CFR part 30; and other Registered Apprenticeship stakeholders such as Related Technical Instruction (RTI) providers, school counselors, workforce development agency staff, and other intermediaries often do not promote apprenticeship to individuals from underrepresented communities and do not refer such individuals to RAPs.

At the same time, lacking awareness of Registered Apprenticeship, many companies/industries do not see apprenticeships as a viable solution to achieving DEIA in their workforce and talent pipelines. Additionally, companies rely upon traditional recruiting sources that may not be sufficient to increase representation of underserved communities in RAPs. Nontraditional sources must be identified, relationships cultivated, and targeted strategies implemented to address specific demographics.

Occupational segregation continues to be an issue in RAPs. Only 13.7 percent of active apprentices are women, and women also have lower apprenticeship completion rates. In addition, most women apprentices are in the health, hospitality, education, and care economy sectors, which have lower hourly wages on completion, resulting in a significantly lower wages for women when their apprenticeships end. African American apprentices are also impacted by occupational segregation and have both the lowest completion rate and the lowest hourly wage at completion of any race or ethnicity. While Hispanic apprentices have achieved strong

⁶ Per 29 CFR 30.2, Registration Agency means the Office of Apprenticeship or a recognized SAA that has responsibility for registering apprenticeship programs and apprentices, providing technical assistance and conducting quality assurance assessments and reviews of registered apprenticeship programs for compliance with the requirements of 29 CFR parts 29 and 30.

representation in construction and the skilled trades, they are also impacted by lower completion rates and underrepresented in other sectors, including the high-paying science, technology, engineering, and mathematics (STEM) fields. American Indians and Native Americans are experiencing a slow decline in participation rates in RAPs. Asian Americans, Native Hawaiians, and Pacific Islanders, the fastest growing of America's racial and ethnic groups, account for only 2 percent of all apprentices vs. more than three times that number in the general population. Women, individuals with disabilities, and the Asian American, Native Hawaiian, and Pacific Islander communities are the three most underrepresented groups in RAPs.

In sum, a commitment to equity needs to be embedded much more broadly and deeply across all apprenticeship stakeholders.

Subcommittee members' personal experiences with these issues informed the DEIA Subcommittee's work. In Subcommittee meetings, many Subcommittee members described these experiences with passion and authenticity. The following is a small sample of their remarks. The Subcommittee has collected more of its experiences and remarks in Appendix II.a.

"Apprenticeships are nothing short of a transformative vehicle for achieving DEIA, because they unlock opportunities to meaningful and well-paying occupations."

"When I was an apprentice, I was the only African American. 30 years later my son was an apprentice in the same occupation, and *he* was the only African American. When you see the low numbers of African Americans in certain occupations today -- it is not enough!"

"As we are expanding into new sectors such as healthcare where we already have more representation of women and people of color in the low-wage areas, we must not be lulled into thinking that the problems of under-representation and discrimination are reduced because the representation of women and people of color in apprenticeship has increased. The increase comes from their being in low-wage occupations and doesn't address the problem of occupational segregation at all."

"I know that folks are afraid of speaking about discrimination because they do not know what their employers are going to say. But if we cannot have a conversation about racism, there is no way we can improve these numbers. Unfortunately, not everyone is ready to have that conversation. We have to ask whether there is a pathway for truth and reconciliation."

"When I ran a RAP for my union, I used to welcome [Registration Agency] audits, because I learned a lot from them about how to better implement DEIA -- audits fulfill important educational purposes. But it has been a long time since I've heard of [our Registration Agency] doing an audit of any of our programs."

"We are in the middle of the Great Resignation. The Baby Boomers are retiring. We have a worker shortage that is both urgent and chronic. Apprenticeships can address these

issues. But only if intentional DEIA efforts are used to expand the talent pools from which employers and sponsors draw.”

“The Youth Transition To Work Pre-Apprenticeship Program . . . gave me valuable contacts . . . to study nursing and the necessary preparation to start as a CNA right out of high school. The YTTW workshops and work-readiness training were exactly what I needed to do my apprenticeship.” – *an alumna of a program run by an ACA member*

Scope of Subcommittee’s work

The DEIA Subcommittee used the following five questions to guide its deliberations and define the scope of Subcommittee work:

- **Overall Process:** What are the 3-5 most impactful actions the Department can take to ensure equity is embedded broadly across the national apprenticeship system and that the Department’s goals for diversity, equity, inclusion, and accessibility can be achieved?
- **Industry Demand:** How can we better position Registered Apprenticeship as a DEIA strategy for industries that are seeking to diversify their workforce and those that are not, particularly those industries that may be new to apprenticeship?
- **Supply-Side Barriers:** What challenges do underserved and underrepresented communities face during the apprenticeship process and what plans for support should we put in place to ensure these participants can access, persist, succeed, and complete apprenticeship programs?
- **Strategies:** What innovative DEIA strategies and models can we use on a local, statewide, regional, and national level to improve outreach and engagement connecting industry in well paid, sectors with job seekers in underserved and underrepresented communities?
- **Investments:** What are the most critical investments USDOL can make to support DEIA in apprenticeship and how should we measure, monitor, and assess success? Are there specific Federal workforce programs that should be leveraged to support these equity strategies (e.g., WIOA funding to support pre-apprenticeship)?

Factors critical for understanding Subcommittee’s overall work

1. *First things first.* Broadly speaking, DEIA is, rightly, concerned with all underserved communities. Indeed, the Executive Order (E.O.) on “Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce,” E.O. 14035 (June 25, 2021), includes a number of populations in the term “underserved communities.” (See table and definition in Appendix II.b.)

On the other hand, the regulations governing Registered Apprenticeship, 29 CFR parts 29 and 30, do not cover all of these populations. Those regulations only require RAPs not to discriminate on the following bases: race/color (defined by the Census Bureau to mean Whites, Blacks/African Americans, Asians, Native Americans/Alaska Natives, and Native Hawaiians/Pacific

Islanders); ethnicity (defined by the Census Bureau to mean Hispanics and non-Hispanics); religion; sex (including pregnancy and gender identity); sexual orientation; disability; age (40 and older); and genetic information. The regulations require RAPs to take affirmative action to increase employment opportunity only if their apprentice population is underrepresented for the following groups: Blacks/African Americans; Asians; Native Americans/Alaska Natives; Native Hawaiians/Pacific Islanders; Hispanics; Women; and Individuals with Disabilities. As a result, these are the only categories for which RAPIDS contains data.

To be able to inform Subcommittee recommendations with existing data and produce this Interim Report within 6 months, the Subcommittee decided to limit the scope of its initial work specifically to the populations for which 29 CFR part 30 requires affirmative action. In this section of the Report, we will refer to these populations as “underserved demographic groups.” The Subcommittee hopes to address the other underserved communities as defined in E.O. 14035 in the ACA’s Final Report.

2. *Often, one size does not fit all.* The Subcommittee recognized that many of the issues affecting DEIA differ in kind or significance for different underrepresented communities. Opportunities to increase African American participation in apprenticeships may require different recruiting strategies such as outreach in faith-based and community organizations. In addition, issues involving criminal justice-involved individuals are urgent for African Americans but not as urgent for women, for example. Since Hispanics are relatively well-represented in the nonskilled construction trades but not in the skilled trades, strategies to increase their representation will be different than those for women, whose representation is abysmal in virtually all the trades. Thus, the Subcommittee attempted to ensure that the concerns of some specific populations are included in its general recommendations and expect that, as implemented, the Subcommittee’s recommendations are likely to need to be adapted to the specific needs of the members of the different underserved demographic groups.

For that reason, the Subcommittee strove to ensure that its recommendations address and, indeed, champion, the following concerns: gender; race/ethnicity; youth/pre-apprenticeship; criminal justice-involved individuals; individuals with disabilities; emerging technologies; and procurement and other incentives for employers/RAPs. See more notes on these concerns under consideration by the Subcommittee in Appendix II.e.

3. *At the same time, DEIA efforts can help apprentices from all demographic groups.* The Subcommittee recognized that many of the approaches recommended to respond to a particular group or industry’s needs are likely to have a salutary effect on other populations or industries as well.

Another reason for this result is that individuals often belong to more than one underrepresented community and face intersecting barriers. Targeted outreach at day-care

centers and YWCAs located in neighborhoods with high minority populations is likely to identify apprenticeship candidates who are men of color as well as female.

4. *Follow the money.* Nothing can be accomplished without resources.

Recognizing that basic principle, the Subcommittee makes an overarching recommendation that applies to all of the Subcommittee's specific recommendations: that policy makers invest sufficient resources in the Office of Apprenticeship (OA), the State Apprenticeship Agencies (SAA), and other Registered Apprenticeship stakeholders to accomplish these objectives. This applies to the Subcommittee's recommendations about process, strategies, investments, technical assistance, technology, data, and marketing. To achieve this recommendation will require Congress and USDOL to significantly increase not only the resources available for apprenticeship investments, but also for OA's own core operating budget. For that reason, the Subcommittee strongly urges Congress to pass legislation, such as the National Apprenticeship Act of 2021, H.R. 447, that provides significant resources to the Registered Apprenticeship ecosystem, and to prioritize spending on DEIA activities, taking into account the concerns of the affected communities.

Background

I. *Further background on specific DEIA-related issues and challenge areas*

a. Description of Subcommittee's approach for analyzing the issue

To respond to the guiding questions, the Subcommittee organized its section of the Report into three major "buckets:" overall process for DEIA implementation; industry demand; and supply-side barriers. As applicable in each "bucket," the Subcommittee addresses the impact on particular underrepresented populations; provide specific recommendations for strategies, policy and procedure, investments, technology, data, metrics, innovations, government partnerships, and technical assistance; and highlight best practices.

b. Additional background that would be helpful to the reader

Appendices I and II provide additional background that the Subcommittee reviewed and that would be helpful to the reader.

c. Overview of the specific areas where the Subcommittee developed individual issue papers

As mentioned above, the Subcommittee developed sets of recommendations (contained in individual issue papers set forth in Appendix I.a) on overall process for DEIA implementation; industry demand; and supply-side barriers. The section below entitled "The Subcommittee's specific recommendations" contains an overview of each of these areas.

II. *Impact/benefits/opportunities that could be realized if the issues are addressed successfully*

Embedding DEIA into the Registered Apprenticeship system will future-proof the nation's workforce by cultivating the talents and reflecting the diversity of the nation's economy and people. Doing so would:

- Ensure that all have equitable access to the unique “earn and learn” apprenticeship model
- Meet industry demand for a skilled workforce, recognizing the value of the talents and strengths of the nation's increasingly diverse populations
- Significantly increase the number of active apprentices and the return on investment for employers. The latter would be accomplished by improving completion rates through supporting access to and creation of wrap-around services, the lack of which has a disparate effect on underserved communities
- Create a culture of inclusion supporting a diverse workforce with the cultural and linguistic competencies to connect directly with the local communities in which they live
- Place the most marginalized and under-resourced communities at the heart of RAP program policies and practices, giving everyone from all backgrounds and every walk of life the opportunity to gain a career path with family-sustaining wages based on local living standards, hallmarks of the Registered Apprenticeship system
- Combat occupational segregation by creating intentional pathways into higher paying positions through extending apprenticeships that lead to family-sustaining wages in the service sector; and
- Break the cycle of poverty by creating opportunities for members of underserved communities to lead and succeed, supporting America's most vulnerable families, and broadening access to generational wealth

Increasing industry demand for RAPs to achieve DEIA goals would create a win-win for employers, apprentices, and underserved communities.

Recommendations

I. The Subcommittee's specific recommendations

Overall Recommendations on the Process for DEIA Implementation

While many DEIA best practices are already required under 29 CFR part 30 -- universal outreach, nondiscriminatory selection, anti-harassment training, DEIA benchmarks -- there is widespread lack of awareness and implementation of requirements. The Subcommittee recommends that all apprenticeship stakeholders, including Registration Agencies, put a high priority on improving implementation of existing DEIA requirements (29 CFR part 30) as a primary means of embedding DEIA into the DNA of RAPs.

The Subcommittee's numerous specific recommendations for doing so are set out in Appendix II.d, Detailed Recommendations. Here the Subcommittee highlights seven recommendations,

involving policy/procedures, data and metrics, and investments, that the Subcommittee thinks could be game-changers to make real progress in this area:

- OA and the State Apprenticeship Agencies (SAAs) should undertake frequent program reviews during which OA staff audit progress and provide actionable technical assistance.
- To address occupational segregation in apprenticeship and ensure that underrepresented populations are not tracked into low-paying, dead-end jobs through apprenticeship, OA should amend the definition of “apprenticeable occupation” in 29 CFR part 29 to require that, for an occupation to be apprenticeable, completion of a RAP in the occupation must lead to a family-sustaining wage based on local living standards and to a meaningful and intentionally-designed career path.
- OA/SAAs should measure and track success through Equity Indices showing the representation of new, active, and completing apprentices from each underserved demographic group in the context of local area, industry, education/skills, and wages/promotions.
- OA and SAAs should make apprentice demographic data, disaggregated by race, ethnicity, and sex, and separately for each State and for each standard occupation code, public on a dashboard site, and should undertake a data-driven approach (using data from RAPIDS, Program Standards, and program reviews to prioritize program reviews, geographic areas, and industries to inform its investment decisions, determine where to deploy resources, and determine on what topics to provide staff training and technical assistance to sponsors.
- OA should consider gathering new data on RAPs’ and apprentices’ needs through formal, representative surveys (not just anecdotes) including understanding barriers to completion and long-term career pathways.
- OA should create a tailored communication strategy that reaches out to specific underserved demographic groups addressing their unique concerns. OA should fund grantees to actively educate RAPs (including Joint Apprenticeship and Training Committees [JATCs]), apprentices, higher education, and other apprenticeship stakeholders about DEIA practices, including nondiscriminatory selection processes, outreach and recruitment practices, and retention, to ensure that *all* RAPs are aware of DEIA requirements and best practices. Incentives should not be diluted with too many priority groups; issues with particular groups should not be masked by aggregating groups.

a. Industry Demand Recommendations

With regard to the impact of industry demand on DEIA in Registered Apprenticeship, the Subcommittee found that a major limiting factor is that many companies/industries lack awareness of RAPs and do not see apprenticeships as a viable solution to achieving DEIA for their workforce and talent pipelines. The Subcommittee recommends a number of steps be taken to increase industry demand for Registered Apprenticeship to achieve DEIA goals. The

Subcommittee also recommends that DEIA goals be leveraged as a mechanism to achieve Environmental, Social, and Governance (ESG) objectives established by employers. These steps are set out in Appendix II.d, Detailed Recommendations. Here the Subcommittee highlights two recommendations, involving policy/government partnership and investments, that it thinks could be game-changers toward real progress in this area:

- OA should work with the Office of Federal Contract Compliance Programs (OFCCP) to leverage existing Federal procurement requirements to increase demand for apprentices from diverse populations. OA and OFCCP should also establish apprentice utilization goals for federal construction sponsors and consider establishing them for federal supply-and-service contractors as inclusively as possible. Such requirements could have an especially positive impact in promoting DEIA in particular in the construction sector both because of upcoming infrastructure funding and because of the sector's proven track record of providing access to highly skilled, in-demand occupations with family-sustaining wages through registered apprenticeships.
- OA should increase the crucial role it already plays in incentivizing employers to adopt apprenticeships that offer opportunities to underserved demographic groups.
- OA should help employers braid together resources from patchwork of support to provide technical assistance on how to access incentives. (Help in accessing and braiding available support also should be provided to apprentices, to help remove supply-side barriers.)
- OA should help industry leaders emphasize efforts to use apprenticeships as a way of increasing DEIA in career clusters, such as areas in STEM, that may have a greater need for DEIA. (Similarly, OA should focus efforts in reducing supply-side barriers on career clusters such as STEM that have a greater need for DEIA.)

b. Supply-Side Barrier Recommendations

With regard to the supply-side barriers to DEIA in Registered Apprenticeship, the Subcommittee found that individuals from underserved communities often experience barriers to gain access to, to succeed in, and to complete apprenticeship programs. These barriers include lack of awareness of apprenticeship opportunities, lack of necessary skills or qualifications, language barriers, lack of resources to participate in programs, and discrimination and harassment. The Subcommittee's overall recommendation is that the apprenticeship ecosystem make it a priority to remove barriers for individuals from underrepresented communities to gain access to, to succeed in, and to complete apprenticeship programs. The specific recommendations for doing so are set out in Appendix II.d, Detailed Recommendations. Here the Subcommittee highlights five recommendations, involving policy/government partnership, investments, and innovations, that it thinks could be game-changers toward real progress in this area:

- OA and SAAs should address critical areas of concern that interfere with apprentices' entrance into and completion of their apprenticeships, such as aptitude tests that tend to screen out applicants from certain underserved demographic groups; harassment,

discrimination, bullying, and hazing, which may be particularly prevalent in some industries; and discriminatory work assignments and fewer hours.

- USDOL and other Federal and State agencies should invest heavily in quality workforce readiness and pre-apprenticeship programs. (TEN 13-12 establishes a framework for defining quality pre-apprenticeship programs.)
- OA should focus on high school apprenticeship as a critical DEIA strategy.
- USDOL and other Federal and State agencies should consider providing unemployed/dislocated workers incentives to go into an apprenticeship program (e.g., signing bonuses; payments of \$5+/hour on top of wages for a period of time; housing subsidies). These incentives should be focused on workers from underserved demographic groups.
- OA should work with the OSHA (Occupational Safety and Health Administration) to establish and enforce standards for personal protective equipment (PPE) that fits; clean, sex-separate or single-user bathrooms; and workplace violence.

The Subcommittee also highlights the following potentially game-changing best practices:

- Employers/unions/RAP sponsors should create a culture of inclusiveness/belonging before, during, and after the apprenticeship process, which should include having diverse mentors and peer “buddies” support systems by hiring cohorts of two at minimum and creation of member driven national alumni association groups or affinity groups to encourage comradery, networking, and professional development.
- Employers/unions/RAP sponsors should ensure journeyworkers have a common understanding of creating inclusive cultures; should train journeyworkers on how to mentor apprentices; and should establish mentoring programs and buddy systems for all apprentices.
- Provision of childcare for early hours for construction jobs and at night so that apprentices can attend class or related instruction when it is at night.

II. Areas for future exploration or further analysis by the ACA

In the future, the Subcommittee plans to explore the following issues:

- The needs of underserved communities not included among the underrepresented demographic groups that the Subcommittee considers today, including rural populations.
- Resolution of possible conflict between the interests of different underserved communities.
- Prison apprenticeships do not align with outside apprenticeships; the pay is abysmal; they often perpetuate sex-based occupational segregation; they are often so short and inadequate they do not turn out journey-level workers; they do not really help when you get out or lead to meaningful/permanent jobs; when you come out of prison, you still have to try to get into a non-prison apprenticeship before you can journey out.

- How RAPs can address the needs of criminal-justice-involved/formerly incarcerated individuals.
- Mechanisms for ensuring that completion of a RAP leads to family-sustaining wages based on local living standards even in industries, like Early Care and Education (ECE), that provide good jobs but face economic constraints.
- How definitions of family-sustaining wages based on local living standards can be integrated in these mechanisms.
- Should the Eligible Training Provider (ETP) eligibility requirements under WIOA be changed so that quality pre-apprenticeship programs that meet the definition in TEN 13-12 are eligible for ETP inclusion in the same way that RAPs are?

Apprenticeship Modernization

The Subcommittee's Vision for Modernizing Apprenticeship

The ACA's Apprenticeship Modernization Subcommittee's deliberations yielded the following recommendations for USDOL to consider in modernizing the Registered Apprenticeship system and expanding Registered Apprenticeship into new industries while maintaining the high quality that characterizes RAPs in industries and occupations where Registered Apprenticeship is prevalent and successful. The Modernization Subcommittee's discussions were organized across seven issue areas: Apprenticeship Quality, Apprenticeability, Data Usage, Procurement and Funding, the Apprenticeship Ecosystem, Emerging Technologies, and Messaging and Outreach.

In the modern era, data are essential. The Subcommittee's vision for a modernized Registered Apprenticeship system involves leveraging quality data and analytics to target new industries and diverse populations for apprenticeship expansion and uptake and improving and standardizing data collection and reporting to realize the immense benefits of a national, comprehensive data set. The Subcommittee supports and recommends a modernized approach to expanding apprenticeship into new and emerging sectors in a way that avoids "splintering" occupations into overly specific occupational subsets and precludes adverse impacts to successful programs in industries where apprenticeship is well established – data can play an important role in avoiding these outcomes as well. The Subcommittee recommends that a modernized Registered Apprenticeship system take advantage of the benefits of virtual learning and other emerging technologies, where practicable, while maintaining the in-person safety and training elements that have made apprenticeship successful. Overall, the Subcommittee's vision for modernizing and expanding the Registered Apprenticeship system centers on maintaining and building upon high-quality standards for apprenticeship programs and ensuring that apprenticeship programs place participants on a path to quality careers with family-sustaining wages.

Apprenticeship Quality

Registered Apprenticeship has been identified as the "gold standard" workforce development strategy for career seekers and industry leaders. Registered Apprenticeship's focus on employment and training in highly skilled occupations with progressive wages through structured on-the-job learning (OJL), related instruction, and recognized credentials has been a recipe for success. As we look to expand Registered Apprenticeship and modernize it across more industries and occupations, it is important that we look at what has made it successful and what can be built upon. *See Appendix I.b for additional context on apprenticeship quality.*

Recommendations and Best Practices:

- **Define "apprenticeship," "pre-apprenticeship," and "youth apprenticeship" to ensure common understanding and program quality are addressed.**

- **Ensure that RAPs (including youth apprenticeships) are bona-fide apprenticeships that meet quality criteria for Registered Apprenticeship, including employer/industry commitment to hire apprentices during the apprenticeship, and that apprenticeship programs place participants on a path to quality careers with family-sustaining wages.**
- **Develop enhanced policies to ensure any costs to apprentices are transparent and reasonable during their participation in Registered Apprenticeship.**
- **Identify enhanced opportunities to ingrain or expand DEIA and EEO activities into RAPs.**
- **Enhance consistency and standardization across the three current training approaches (time-based, hybrid, and competency-based) to see if updates can be made to ensure competency attainment is achieved through all models, while providing certain protections into standards with regard to time in OJL to ensure proficiency is obtained, potentially expanding the hybrid model as a long-term goal for quality standards.**
- **Study the effectiveness of incorporating online learning into Registered Apprenticeship models, including how to progress successfully through a RAP; assess if online learning is not practical in whole, or in part, for certain occupations/industries.**
- **Consider industry practices and specific aspects of occupations in determining the appropriate divide between in-person and virtual learning.** Some industries or occupations (with important safety considerations, such as in construction, for example) have more of a need to provide instruction in person, while others may be well-suited to moving apprenticeship learning to virtual platforms. In general, programs should seek to maximize the benefits of in-person and virtual learning in a way that makes sense for their industry.
- **Identify opportunities to imbed more industry-recognized credentials as interim credentials into RAP design to enhance program effectiveness and expansion of career pathways.**
- **Engage industry associations, or a table of employers organized through forums, to ensure continued alignment of apprenticeship program standards with industry needs.**
- **Establish OA-SAA committees to study completion rates for occupations nationwide to determine if occupations/programs may not be meeting quality standards and whether technical assistance can be provided or if occupations/programs should be deregistered.**

Apprenticeability

"Apprenticeability" refers to the suitability of an occupation for apprenticeship. (See 29 CFR 29.4.) Per USDOL's current apprenticeship regulations, apprenticeable occupations: (1) involve skills that are customarily learned in a practical way through a structured, systematic program of

supervised OJL; (2) are clearly identified and commonly recognized throughout an industry; (3) involve the progressive attainment of manual, mechanical, or technical skills and knowledge that, in accordance with the industry standard for the occupation, would require the completion of at least 2,000 hours of OJL to attain; and (4) require related instruction to supplement OJL. See *Appendix I.b for additional context on apprenticeability.*

Background and Opportunities

Policymakers considering expanding and modernizing the Registered Apprenticeship system must consider apprenticeability of new occupations that are entering into the system. This consideration should include ensuring occupational integrity, job mobility, and the creation of new RAPs that lead to careers in occupations that provide family-sustaining wages. Policymakers must also consider any adverse impacts on apprenticeship programs for established industries and occupations and whether an occupation is overly specialized to the degree it limits an apprentice's ability to work consistently throughout the year, and must avoid "splintering" (i.e., creating an apprenticeship program/occupation that is too specific in an occupational subset, or splitting occupations unnecessarily.) See *Appendix I.b for more detail on the Apprenticeship Modernization Subcommittee's discussions on apprenticeability.*

Recommendations

- **Leverage industry data points (O*NET), Bureau of Labor Statistics (BLS) data, and other relevant data sources, develop a priority list of jobs/industries into which to expand apprenticeship, avoiding splintering within occupations and adverse impacts to industries with established apprenticeship programs.** Examine occupations/industries where specialization/"splintering" has occurred, but where apprenticeships have generally kept participants within a core career pathway, as instructive examples.
- **Accelerate Registered Apprenticeship deployment in growing industries and sectors, while ensuring Registered Apprenticeship curricula are responsive to industry needs, and that Registered Apprenticeship templates and requirements are compatible with and flexible for different kinds of jobs and industries.** Avoid "splintering" on multiple fronts – ensure new apprenticeship programs are not overly specialized to enable apprentices to apply learned skills across employers in an occupation, and ensure new apprenticeship programs do not divert resources from established RAPs that continue to expand.
- **Ensure that at the end of a RAP, apprentices are on a pathway to careers with family-sustaining wages.** USDOL should assess its options for doing so, including revising the criteria for apprenticeability at 29 CFR 29.4, the requirements for RAP standards at 29 CFR 29.5(b)(5), or both.
- **Seek to enhance the reputation of apprenticeship.** Employers, apprentices, and stakeholders need to see Registered Apprenticeship as a viable pathway to quality jobs.

Organized and unorganized stakeholders need to work together and not be self-serving but promote apprenticeship for all jobs.

Data Usage

Data quality is central to modernizing the Registered Apprenticeship system. The Apprenticeship Modernization Subcommittee discussed ways to improve data quality, make data collection more consistent, and to use data more effectively to tell the apprenticeship story. OA has made strides in recent years to improve its data collection and streamline public access to meaningful apprenticeship data. For example, the Registered Apprenticeship Partners Information Management Data System (RAPIDS) has undergone meaningful improvements in recent years. The Subcommittee's recommendations regarding data should be used to help guide OA in refining its data collection systems based on feedback from ACA members and their unique perspectives as apprenticeship stakeholders from the employer, labor, and public sectors. See *Appendix I.b for additional context on data usage.*

Recommendations

- **Create a more accessible database for apprentices, potential apprentices, job seekers, and those in career transition to search, understand, and apply for apprenticeship opportunities.**
- **Use apprenticeship data to target guidance, outreach, or other elements of performance monitoring.**
- **Use data to make the case for apprenticeship's value and to identify targets for apprenticeship growth.**
- **Make RAPIDS data more publicly available and accessible to improve transparency and accountability, and enable improved insights and analysis related to apprenticeship.**
- **Modernize RAPIDS system to fully capture licenses, degrees (Associate's and other degrees), and the full scope of credentials earned through apprenticeship programs.**
- **Integrate RAPIDS with the existing third-party systems that already have this degree and certification information.**
- **Generally, encourage those States that do not participate in the RAPIDS system, or participate to a lesser degree than full participant States, to participate in the collection and sharing of apprenticeship data for the benefit of the national dataset (RAPIDS).** This may include:
 - **Surveying** States that do not participate (or participate to a lesser degree) in RAPIDS to help understand the challenges – what would it take to integrate more fully? Are there State-level laws or regulations that pose challenges?

- **Providing technical or other guidance** to States about navigating State-level laws and regulations that preclude or prohibit participation, or other issues that preclude or prohibit participation in RAPIDS.
- **If after the above efforts occur there are still SAA States not participating in RAPIDS, OA should make full participation in RAPIDS a requirement in order for a State to receive OA State-level funding.**
- **Encourage sponsors and apprentices to provide requested data for the benefit of a robust, national apprenticeship dataset.** This may include:
 - **Prompts explaining the value** of including a certain piece of data when apprentices or sponsors neglect to fill in (e.g., “Please consider providing data on (x demographic issue), as these data are used to improve apprenticeship outcomes nationally. Your information is deidentified and will not be used for any purpose other than to inform apprenticeship performance outcomes”).
 - **Collecting more contact information from apprentices to better enable them to provide or confirm/verify information** (e.g., “You have been registered as an apprentice, and this is your information – please let us know if any of this is inaccurate”). Relatedly, encourage apprentices to provide data during the registration process.
 - **Agencies should conduct periodic, representative surveys of current and former apprentices** to deepen understanding of apprenticeship programs, experiences and outcomes. The survey could focus on effective practices and concerns related to 29 CFR part 30, as well as apprentices’ satisfaction with their program.
- **To assist stakeholders, including States and sponsors, with improved data collection and usage, OA should consider investments or other financial support to incentivize complete and accurate data collection.**

Procurement/Funding Apprenticeship

Registered Apprenticeship is a premier workforce training program with 85 years of proven experience in the United States. This track record has justified historic investments in the Registered Apprenticeship system at the Federal and State levels through programs such as Davis Bacon, tax credits and apprenticeship expansion grants. The Modernization Subcommittee has explored methods that policy makers should consider leveraging to grow and expand the Registered Apprenticeship model.

Areas explored included items such as how to best leverage Federal investments to drive Registered Apprenticeship expansion, how to leverage the Federal Government’s procurement process to drive Registered Apprenticeship expansion, accountability for those receiving Federal investments and contracts to utilize RAPs and how to achieve greater coordination for Registered Apprenticeship expansion in Federal programs (WIOA, GI bill funds) and Federal agencies (Departments of Education, Transportation, etc.).

The Federal Government must leverage its spending power to incentivize Registered Apprenticeship adoption across an array of industries having contracts via taxpayer funding. This is an opportunity to *ensure intentionality* with Registered Apprenticeship expansion, and having the Federal Government drive it through procurement can lead to desired outcomes. See *Appendix I.b for additional context on procurement/funding apprenticeship*.

Recommendations and Best Practices:

The Modernization Subcommittee recommends the following actions to explore utilizing government procurement and investments to drive Registered Apprenticeship adoption:

- **Mandate coordination among Federal agencies and employment and training programs directing Federal investment.**
- **Use Federal funding to promote more skill development and attainment of multiple, portable credentials during RAPs, thus ensuring greater employability throughout the workforce.**
- **Long-term, sustainable incentives, like tax breaks/credits, to employers for implementing a RAP. Target resources toward diverse populations underserved by Registered Apprenticeship, rather than doubling up funding for programs and populations that are already well-served. Target long-term, sustainable investments for DEIA and ensure accountability to confirm that funding is ending up in the intended place.**
- **On all federally funded projects, apprenticeship utilization goals⁷ should be required to ensure contractors provide these career pipeline opportunities in ways that meet or exceed diversity goals.** The Subcommittee views federally funded projects as important opportunities to promote apprenticeship – not only in construction, but in all sectors and industries where apprenticeships would be valuable and wherein Federal funding could be used to promote apprenticeship adoption. For example, Registered Apprenticeship utilization on Davis Bacon and Federal Works Agency projects should be mandated.
- **Section 13007 of the Bipartisan Infrastructure Law allows (but does not require) State DOTs to spend as much as they want of their highway allocations on “Workforce Development, Training, and Education,” including pre-apprenticeship. Minimum levels of funding should be mandated for creating or expanding pre-apprenticeship programs, creating or expanding adult and youth apprenticeship programs, and funding certain national industry- and equity-intermediary activities, as the National Apprenticeship Act of 2021, H.R. 447, would provide (especially for Registered Apprenticeship opportunities for underrepresented populations).**

⁷ See Appendix I.b for additional context on apprenticeship utilization goals, including current regulatory language (at 29 CFR 30.5).

Apprenticeship Ecosystem

Over the years, the success of Registered Apprenticeship models has led to a significant increase in stakeholders in the Registered Apprenticeship system. While RAPs are still operated by the sponsor (which can include labor organizations, associations, community colleges, employers, and intermediaries) and registered by either USDOL or a USDOL-recognized State Apprenticeship Agency (SAA), there are many more stakeholders in the system. The Modernization Subcommittee has researched the current Registered Apprenticeship system in order to bring about greater cohesion and system building to define, increase, and identify opportunities for a high-quality and functioning Registered Apprenticeship system. See *Appendix I.b for additional context on the apprenticeship ecosystem.*

Recommendations and Best Practices:

The Modernization Subcommittee recommends the following actions to explore creating a more cohesive Registered Apprenticeship system that promotes quality programs, enhances EEO and DEIA efforts, and provides a clearer role for new actors in the Registered Apprenticeship system to build and supplement these activities:

- **Assist States (including by leveraging funding) in adopting apprenticeship laws that conform with Federal regulations at 29 CFR parts 29 and 30.**
- **Identify opportunities for more standardization across the Registered Apprenticeship system while preserving necessary flexibilities to ensure the Registered Apprenticeship model is adaptable to different industry and regional needs.**
- **Ensure Federal funds are used efficiently and ensure Federal funds are not spent in a duplicative manner (unintentionally on the same program or individual).**
- **Provide detailed guidance so that State-level or employer/sponsor-level stakeholders know exactly where they need to go and what they need to do to register a program, obtain answers to questions, funding opportunities and whether there are templates or other guidance to get them started.**
- **Enhance/study the referral between OA/SAA States, intermediaries, and other stakeholders in apprenticeship from a customer and employer perspective.**
- **Hold regular convenings for the stakeholders in the apprenticeship ecosystem that bring together stakeholders to address the challenges and create a more cohesive ecosystem.**
- **Identify workforce development boards that refer people to RAPs and provide apprentices/employers with funding support.** Bring boards together to share best practices (policies, benchmarks, relationships, outreach, etc.), and to explore what barriers remain for promoting Registered Apprenticeship. Create a toolkit/resource to communicate this information and refine apprenticeship referral processes, support provided to apprentices, etc.

- **Assess, enhance, and publicize the toolkit (or other new resources) for RAPs that identifies the various sources of funding that can be tapped for supporting apprentices (fees, tools, pay for RTI, etc.), for pre-apprenticeship and outreach activities, and for expanding/modernizing the program.**
- **Create an Innovation Fund with WIOA funding to States that can be used by workforce boards for pilot projects that enhance the connection with apprenticeship programs and advance DEIA goals (e.g., dedicated Registered Apprenticeship “navigators” at the workforce boards to interface between RAPs and American Job Center (AJC) resources).**

Emerging Technologies

Taking advantage of developments in technology, including improvements on existing technology and leveraging new or unique capabilities from emerging technologies, is an important aspect of apprenticeship modernization. Over the past 2 years, industries have been forced to grapple with the impact of the COVID-19 pandemic, including staying engaged with a workforce that has transitioned to working from home in many sectors. There are many lessons to be learned from this transition, including successes and challenges, and incorporating virtual learning and engagement stands out as a key topic in the emerging technologies space. New technologies continue to develop and the Apprenticeship Modernization Subcommittee discussed ways to leverage emerging technologies to enhance apprenticeship and workplace learning programs and opportunities, including assessing whether there are any challenges with employer/sponsor uptake or incorporation of emerging technologies. *See Appendix I.b for additional context on emerging technologies.*

Recommendations

- **Update and enhance standards and guidance to reflect new and emerging technologies (including any updates to existing or emerging Standards Builder boilerplates/templates).** This could help achieve greater leveraging of tools to enhance the customer/sponsor experience in dealing with Registered Apprenticeship.
- **Incorporate advantages from emerging technologies in the client management space** (e.g., Salesforce and related client management services).
- **Capitalize on growing interest in online/livestream learning platforms for occupations/industries where virtual/online instruction enhances related instruction while ensuring in-person instruction continues to be prioritized in occupations where hands-on/in-person related instruction is critical (e.g., cybersecurity versus electrician.)** Online formats may have helped drive attendance/retaining of apprentices during the increased rollout of such platforms during the pandemic.
 - **Relatedly, better understand the implications of incorporating emerging technologies like virtual learning by industry.** Ensure that apprenticeship

remains 'nimble' and able to react to emerging technology benefits. Established standards/language should not preclude incorporation of benefits from new technologies. Achieve a sensible balance between job skills that must be taught in person and any opportunities to learn virtually.

- **Identify and target support to programs that may benefit from an emerging technology in the job skill training space.**
 - Ingrain pre-apprenticeship and Registered Apprenticeship in high schools, where the curriculum, newly purchased equipment, or both can be used to spark interest among students/pre-apprentices in a given industry or occupation.
 - Leverage emerging technologies to enhance learning, job skill development, and ensure underserved communities will have support to access those technologies.
- **Use new and emerging technologies to support awareness and implementation of EEO standards and diversity, equity, and inclusion goals.** For example, online DEIA-focused trainings for sponsors, managers, or mentors.

Messaging and Outreach Around Apprenticeship

Background/Challenges:

The messaging of Registered Apprenticeship as the nation's premier career training program can be viewed as archaic and requires continuously updating the language used to describe apprenticeships and to promote their success. Ensuring that apprenticeship and its related terminology is modern will enhance the ability to target all populations and industries accurately and effectively in apprenticeship expansion. *See Appendix I.b for additional context on messaging and outreach around apprenticeship.*

Recommendations:

- **Modernize language used to describe apprenticeship and related terminology.**
- **Emphasize "paid work experience" and ensure all RAPs provide paid OJL from day one of the apprenticeship.**
- **Identify and replace outdated terms.** Ensure outdated terms such as "journeymen" and "indentured apprentice" are replaced with words such as "journeyperson" or "registered apprentice" in all States and in all standards of apprenticeship.
- **Emphasize terms like "earn while you learn" and "career versus job" language in promoting apprenticeship on all government websites/material.**
- **Emphasize apprenticeship as a pathway to debt-free education.** Ensure ED understands these benefits, and engage with ED stakeholders in this space to ensure that educational institutions receiving government funding maximize the benefits of Registered Apprenticeship.
- **Equate apprenticeship programs with higher education, leveraging examples from major organizations/RAPs** (such as the Independent Electrical Contractors, Electrical

Training ALLIANCE, IBM and International Association of Machinists and Aerospace Workers).

- **Collaborate with focus groups to solicit feedback, refine messaging and conduct outreach** (e.g., USDOL's Women's Bureau outreach to historically black colleges and universities (HBCUs) for gathering/incorporating feedback to increase Registered Apprenticeship uptake among women of color). Consider the end-user/recipient of apprenticeship messaging and modernize language to enhance effectiveness in achieving buy-in.
- **Through OFCCP and other Federal agencies, encourage utilization of the Apprenticeship Finder (and other similar tools) to identify current opportunities/openings and to prepopulate a timeline for when programs may have openings.** Ensure all agencies are aware of Registered Apprenticeship as a hiring and training option and maximize its use.
- **Share information about *apprenticeship.gov*, the apprenticeship finder tool, and other relevant tools with sponsors during the program registration process.** Maximize RAPIDS for all employers and Sponsors and increase the visibility and accessibility of tools like USDOL/OA's Apprenticeship Finder while also integrating/utilizing low-cost advertising/engagement with other search platforms/algorithms to ensure Apprenticeship/Partner finder tools (and other similar tools) show up when searchers use key terms.
- **Develop and offer nationwide resources to assist States/sponsors with providing high school counselors and staff with updated and current apprenticeship information and resources to ensure students/parents/teachers are educated on Registered Apprenticeship as a debt-free career option.**
- **Enhance high school level apprenticeships with credit given for direct entry into formal RAPs.**
 - Connect with other Federal agency stakeholders on this general topic (including representatives from the Department of Education.))

Industry Engagement in New and Emerging Sectors

Summary of the Overall Issue Area

The IENES Subcommittee of the ACA believes that New and Emerging Sectors represent an enormous and unique opportunity through which to expand Registered Apprenticeship. The IENES Subcommittee believes engaging New and Emerging Sectors will be essential in supporting America's economic recovery and can play an integral role in establishing a more equitable future for the country. Registered Apprenticeship is a tried and true, data-driven model that, when adopted at scale by New and Emerging Sectors, can create millions of earn and learn career opportunities for communities that have too often been systematically barred from pathways to upward mobility.

The challenge before the IENES Subcommittee is this: Given the wide and diverse range of New and Emerging Sectors, and the distinguishing and unique characteristics among them, how can the Registered Apprenticeship system accommodate their differences without compromising the rigor and quality of the existing system?

Acknowledging USDOL successes already achieved through past attempts to make Registered Apprenticeship accessible to and inclusive of New and Emerging sectors, the Subcommittee focused on how to achieve consistency, investment, and scale across four specific areas:

- Branding and Perception
- Incentives
- Standards and Systems Building
- Sector Specific Differences

Specific Area Backgrounds and Recommendations

Branding and Perception

Background

How can USDOL/the ACA improve customer awareness and perception of Registered Apprenticeship? Opportunities for improving Registered Apprenticeship branding and perception in New and Emerging Sectors could promote union and nonunion stakeholders working together and present a unified message, preserve the identity and differentiation of Registered Apprenticeship from other work-based training, unlock power from Registered Apprenticeship being closer to customers (employers and apprentices), and expand Registered Apprenticeship to be used successfully in occupations beyond the traditional trades, including union and nonunion jobs and newer occupations.

Recommendations

Best Practices

1. Educators should not speak of apprenticeship as less than a college option for students; Registered Apprenticeship should be seen as a viable option on the pathway to becoming a successful middle-class American. Branding and marketing at 4-year institutions, 2-year institutions, and training providers generally should address misconceptions about apprenticeships as only limited to skilled trades.
2. Plans should be customer-centric in sectors; solutions should be designed for the customers' requirements.
3. USDOL should engage with industry and trade-associations in developing branding and awareness campaigns.
4. Assets and resources should be broken up and accessible according to audience
5. USDOL in partnership with Registered Apprenticeship sponsors should explore ways to leverage best practices from the current model of Registered Apprenticeship as well as various international models of Registered Apprenticeship such as Canada, Germany and Switzerland, to show how apprenticeships can work more effectively for a large part of the workforce.

Overall Recommendations

6. USDOL must engage with all stakeholders and customers to acknowledge their current biases and perceptions prior to creating any new branding or awareness campaigns.
7. USDOL should partner with industry, organized Labor and trade associations to get more engagement from industry, both generally and specifically with respect to promoting Registered Apprenticeship.
8. Branding, perception, and marketing materials and outreach plans should include recognition of and strategies supporting a wide range of diverse applicants and address specific concerns of underserved communities.
9. State resources: USDOL should create an asset map of what States have for branding and perception.
10. Stories: more stories should be shared, in case-studies, using video.
11. Messaging should emphasize data on apprenticeship outcomes, especially in supporting the importance of DEIA policies.
12. USDOL should leverage momentum from National Apprenticeship Week (NAW) and provide apprentice messaging year-round. Messaging should be directed to a national audience through a national campaign.

Recommendations for Policy Changes

13. Grants and funding should have restrictions removed that preclude funding for public awareness/branding. In particular, Employee Retirement Income Security Act (ERISA) regulations should be examined to relax restrictions on expenditures for public awareness.
14. Intermediaries need to be closer to their customers. Trade associations are a good example of entities closer to their customers. Supporting intermediaries who are closer

to the customer (employers and apprentices) provides an opportunity for the key stakeholders to have a trusted partner and voice when engaging in Registered Apprenticeship.

Recommendations for Innovation

15. USDOL should rely more on *Apprenticeship.gov* and Apprenticeship USA rather than “Discover Apprenticeship” because of the proliferation of apprenticeship brands, especially across States and localities.
16. The Apprenticeship USA logo should be utilized instead of the “Discover Apprenticeship” logo. There should be a concerted effort by USDOL to stick with one brand in order to create brand recognition by all customers and stakeholders.
17. The program logo and name should not change with administrations. Doing so confuses the market.
18. OA should be used more as a brand rather than USDOL in order to minimize employer caution around USDOL.
19. *Apprenticeship.gov* should be better mapped to the customer journey. Old forms should be updated to reflect modern customers; forms and terminology on the workforce side should be re-evaluated to use employer language. Forms also should be fillable PDFs, and possibly prefilled.
20. Coordination between grantees and investments: grantees should convene to provide feedback on best practices relevant to Registered Apprenticeship branding and promotion, perhaps in a Stakeholder Workshop or focus group. USDOL should facilitate this process.
21. Outcomes of this coordination or stakeholder workshop should be shared among grantees.
22. There should be a ramp-up between year zero, year one, and year two goals of new apprenticeship programs to recognize the importance of branding and perception challenges faced by new apprenticeship programs.

Other Recommendations

23. Changes pursuant to ACA and timelines for those changes should be articulated, shared, and communicated. Utilize the organizations that are a part of the ACA to share any changes or new opportunities made by OA in order to reach all of the key stakeholders the ACA members represent.
24. USDOL should work with other agencies; more connectivity should be demonstrated, but the roles of each agency should remain clear and distinct. For example, USDOL should work with the ED where educational institutions are involved in the delivery of apprenticeship.
25. Messaging from the administration should be careful to favor neither union nor nonunion apprenticeships. Buy-in and conversation from the administration is still important.

26. USDOL should develop or promote stronger regional networks to leverage State asset maps for more industry collaboration and integration of Registered Apprenticeship.
27. USDOL should consistently define and communicate how stakeholders will benefit from registering an apprenticeship and how workers can benefit from joining an apprenticeship program.

Incentives

Background

Well-designed incentives can be highly effective to support wider adoption of Registered Apprenticeship. However, the current system of incentives—administered through Federal grants as well as directly through the public workforce system—is not directly tied to performance outcomes or sufficiently coordinated or robust to move the needle for new and emerging industry sectors. Properly targeted incentives, designed with and on behalf of employers, labor unions, joint labor-management training programs, and other training partners, can overcome inertia and spur wider adoption of Registered Apprenticeship.

Recommendations

Recommendations for Policy

1. Legislatures should provide tax credits for wage and training expenses for apprentices in RAPs – these can be highly effective to support the growth of Registered Apprenticeship in nontraditional industries.
2. Partial wage support to apprentices in RAPs, with appropriate guardrails to ensure that supports are short-term solutions toward starting up self-sustaining apprenticeships and tied to completion metrics, can be effectively employed. These incentives should be targeted and focused on start-up support.
3. USDOL should provide stable, multi-year incentive contracts through dedicated funding to better align with sponsors' and Industry Intermediaries' planning and training cycles. These contracts can include increased expectations year over year as programs ramp up.
4. Model language can help standardize State and local incentives. USDOL should consider providing a guidance letter with suggested language for implementing incentives in order to address the challenge of State and local agencies having to produce redundant systems. Clear definitions around the conditions and uses of incentives is also useful.
5. Agencies should consider nonmonetary supports, such as public recognition, support for outreach, and recruitment assistance.
6. Providing academic credit for apprenticeship training or tuition reimbursement can be effective incentives for apprentices; USDOL should coordinate with the Department of Education and education institutions to promote the use of this strategy.

Recommendations for USDOL Investment

7. USDOL should continue expansion of Industry Intermediary Contracts targeting new and emerging sectors. They have been effective engines of targeted incentives commensurate with the startup support required for apprenticeships in these nontraditional sectors.
8. Categorical funding (targeting size of organization, industry sector, geography) can be used to capitalize on specific expertise.
9. There should be an increase in WIOA/ETP funding dedicated to Registered Apprenticeship; the process for procuring this funding also should be streamlined.

Recommendations for Innovation

10. USDOL should provide or support a universal tool to support apprenticeship management and tracking (an app to log hours or competencies).
11. USDOL should provide or support a directory of incentives available to employers and individuals in Registered Apprenticeship (organized according to the ZIP codes in which the incentives are available).

Standards and System Building

Background

In the last decade, policymakers, industry, and job seekers alike have increasingly recognized the value of Registered Apprenticeship as a pathway to living-wage careers. This has led to a concerted effort by key stakeholders to grow and expand Registered Apprenticeship across all sectors of the economy. In order to support this expansion, it has become clear that current systems and standards must be updated and refined.

Many factors currently influence the national apprenticeship system's ability to effectively support expansion efforts. Shifts in practice such as those associated with the impact of technology in the workplace and in the classroom, the unique and immediate workforce needs of sponsors in nontraditional sectors, the lack of a cohesive system for identifying and defining new and existing occupations, the absence of a process to qualify, support and oversee the work of pipeline agencies (such as Industry Intermediaries) and the need to align Registered Apprenticeship efforts among SAAs and OA are all challenges that must be addressed. (See *Appendix I.c.3, Challenge Statement section*.)

Without an integrated Registered Apprenticeship ecosystem, stakeholders such as apprentices, intermediaries, sponsors, and training providers cannot obtain a clear understanding of what opportunities exist. By updating Registered Apprenticeship's systems and standards to meet 21st Century needs, employers, job seekers, and pipeline entities will be better able to develop, implement, manage, evaluate and expand Registered Apprenticeship. (See *Appendix I.c.3, Opportunities section*.)

Recommendations emerging from the Subcommittee's work are presented below for consideration. These aim to improve existing systems and standards and create social and economic opportunity through Registered Apprenticeship.

Recommendations

1. The approval of future apprenticeship frameworks should be tied to high-quality, industry-accepted occupational skills standards. These standards should be developed according to recognized best practices and include key stakeholder input by frontline workers, industry, Labor and the community.
2. USDOL should be the sole agency responsible for determining how occupations are designated and apprenticeships are organized and approved. Decisions should be based on established criteria. A centralized repository for current and new apprenticeable occupations should be developed and maintained.
3. USDOL should consider revisiting a National Skills Standards Board approach and adopting an occupational skills classification system similar to Canada, UK, Germany, Switzerland, and other countries.
4. Formula funding should be established to ensure USDOL has the necessary staffing and technology to adequately support the growth and expansion of Registered Apprenticeship, particularly into emerging sectors. USDOL should finance a comprehensive analysis to determine the level of investment needed to modernize and expand the Registered Apprenticeship infrastructure to meet USDOL's Registered Apprenticeship expansion goals.
5. When approving occupations, standards, and related apprenticeship applications, USDOL should ensure that completion of a RAP leads to family-sustaining wages based on local living standards. Efforts should be made to leverage the Registered Apprenticeship system in a way that elevates lower wage careers to living-wage careers with full benefits.
6. USDOL should seek opportunities for alignment and collaboration with other Federal and State agencies. Procurement guidelines by Federal, State, and local governments should be leveraged to encourage the development of high-quality, living-wage RAPs and to promote DEIA in these careers. USDOL also should work to ensure that SAAs adopt State apprenticeship law that conforms with 29 CFR parts 29 and 30.
7. Systems should be built to allow Federal and State agencies to reduce friction and competition between Federal and State apprenticeship registration and to better align approval, management and support of apprenticeships, particularly as it relates to emerging sectors. USDOL also should facilitate cross-agency collaboration to address regulatory barriers in specific industries.
8. Formula funds should be available for established intermediaries that meet predetermined quality and performance criteria as determined by USDOL. Reapplication for grants should not be necessary for proven intermediaries that successfully meet these criteria.

9. USDOL should develop a plan and the necessary infrastructure to move toward a system for developing, classifying, and updating occupational training standards in Registered Apprenticeship consistent with the recommendations above. (*See Appendix I.c.3, Recommendations and Best Practices section, for more details on such a system.*)

Sector-Specific Differences

Background

In facing the challenge of promoting Registered Apprenticeship while both accommodating the differences of New and Emerging Sectors and preserving the rigor and quality of the existing system, the ACA offers the following recommendations as strategies through which USDOL could address these Sector-Specific differences. These recommendations would capitalize on opportunities: to create an Registered Apprenticeship system that would be more responsive to, and inclusive of, currently underrepresented sectors and underrepresented workers; to broadly integrate the care economy, which employs large numbers of women, people of color, first generation college students, nonnative English speakers, and essential service providers, into the Registered Apprenticeship system, which would then open to these workers apprenticeship opportunities that include intentionally designed career paths with family-sustaining wages; to leverage Registered Apprenticeship toward closing wage-gaps in industries, such as ECE, that provide good jobs but face economic constraints; and to establish the Registered Apprenticeship system as one that both integrates technology as an emerging sector while also articulating and incorporating technology skills across industries that are appropriate, common, and essential for all 21st century workers. These recommendations are discussed more extensively in Appendix I.c.4.

Recommendations

Within the goal of fully incorporating New and Emerging Sectors into the Registered Apprenticeship system, USDOL needs to consider the following recommendations:

Inclusion

1. USDOL needs to establish equitable, universal, nonexclusionary eligibility standards that can be balanced with sector-specific employment requirements unique to nontraditional and emerging sectors.
2. USDOL should establish policies and eligibility criteria related to Registered Apprenticeship standards, apprenticeable occupations, and allocation of Registered Apprenticeship resources to ensure full inclusion and equal stature to sectors focused on workers traditionally underrepresented in Registered Apprenticeship (e.g., women, people of color, low-wage workers, care-economy workers).

Care Economy

3. ECE RAPs that lead to family-sustaining wages based on local living standards must be prioritized as an essential industry and not penalized for the “wage issue” (e.g., the fact that ECE is not publicly funded, in contrast to the K-12 system, and therefore relies on private dollars and unsustainable State or Federal programs). Instead, the Registered Apprenticeship system needs to be part of the solution to that issue and lead the way for necessary system change and policy reform (e.g., compensation parity with K-12 teachers).
4. In healthcare, a sustained effort aimed at decreasing regulatory barriers and addressing degree inflation for a variety of higher wage occupations is required (e.g., AB 1273 in California and HB 4106 in Oregon). This would facilitate career mobility options targeted at addressing occupational segregation, providing family-sustaining wages through career pathways for incumbent workers or direct entry into the sector.

Technology

5. Recognizing that technology and technology skills are required across all sectors, USDOL, with the assistance of SAAs, should coordinate efforts and resources to ensure that Registered Apprenticeship development and expansion in New and Emerging sectors sufficiently incorporates technology and technology skills.
6. The Registered Apprenticeship system needs to recognize and address challenges unique to the technology sector (e.g., relying on contingent or contract workforces; providing effective in-house mentors and journey-to-apprentice ratios; challenges resulting from the predominance of technology workers operating remotely).

Other recommendations

7. USDOL should promote the expansion of public sector apprenticeships as pathways for USDOL workforce development program participants. Entry-level public sector employment opportunities, including public sector RAPs, should be viewed as an extension of the public workforce development system.
8. To support the creation of a national system of skills standards, work skills that are essential, universal, and relevant across all sectors and all RAPs should be identified and codified. At the same time, skills unique to particular sectors or groups of sectors (including New and Emerging Sectors) should be identified and codified as such.

Apprenticeship Pathways: Pre-Apprenticeship, Youth Apprenticeship, and Degree Apprenticeship

Summary of the Overall Issue Area

The Apprenticeship Pathways Subcommittee was charged to explore and elevate various ways to increase participation in the Registered Apprenticeship system, including expanding access to quality pre-apprenticeship programs that act as a direct pipeline into RAPs, and ultimately long-term meaningful careers. RAPs have had the benefit of a well-defined structure and oversight, and they have proven successful in meeting employer- and industry-driven strategies for hiring, training, and retaining employees. In contrast, while there are many quality pre-apprenticeship programs in existence across the country, generally the term “pre-apprenticeship” lacks a collectively agreed-upon definition, structure, and policy guidance. This flexibility has been championed by various program leaders who present rational arguments for why fixed structures do not always apply to pre-apprenticeships. However, in some cases, these less specific elements have signaled a lack of quality, safety, protection, or clearly defined career pathways for participants as compared to Registered Apprenticeship opportunities.

Registered Apprenticeship is clearly defined in 29 CFR part 29, and while at this time there is no widely accepted definition of pre-apprenticeship, in very simple terms, one of its major defining features is that a desired short-term outcome of pre-apprenticeship is entry into Registered Apprenticeship (for those individuals who wish to pursue Registered Apprenticeship opportunities). The lack of a clear and consistent definition of pre-apprenticeship creates confusion about the differences between pre-apprenticeship, Registered Apprenticeship, and other job training activities (e.g., internship programs, certificate programs), which has led to the misuse or conflation of the terms. Further complicating the issue is the misclassification of some targeted apprenticeship or pre-apprenticeship programs, such as those focused on distinct populations (e.g., youth, veterans, or women).

The Subcommittee recognized the fact that the general public is relatively unaware of pre-apprenticeship opportunities and their benefits. In order to embed a widely supported strategy of pre-apprenticeship as a pathway into Registered Apprenticeship, pre-apprenticeship needs better and more innovative framing so that the public values it and holds it in equally high regard as other skilling programs (e.g., military, higher education).

The Subcommittee concluded that an unpacking of the definitions, quality controls, and policies around pre-apprenticeship is warranted. Above all else, however, the Subcommittee believed that any pre-apprenticeship skill acquisition must be industry relevant. Investigating academic strategies alone to streamline and coordinate a national system of Registered Apprenticeship on-ramps was not sufficient, as the Subcommittee wanted to make recommendations that would be in service to the employers that would benefit from these skilled apprentices, while also opening up the pipeline to a broader talent pool.

Background

While the path for many apprentices is direct entry into State or federally approved RAPs, there are various reasons individuals can benefit from pre-apprenticeship experiences as on-ramps to the structure of a formal Registered Apprenticeship. For example:

- An individual may lack foundational or certain required literacy and/or numeracy skills.
- An individual may fail to meet some of the mandatory credentials as entry requirements (e.g., high school diploma, GED).
- A potential apprentice may not know what trade or occupation they wish to pursue and prefer a less occupation-specific career exploration option.

Rather than putting this type of skill development on the employer's to-do list, pre-apprenticeship programs serve as a means to shore up the learner before entry into a formalized and occupation-specific program.

The benefits of Registered Apprenticeship are fairly well documented—approximately 150-percent return on investment (ROI), around 90-percent retention rate, higher pay, etc.⁸ Due in part to the lack of a standard definition and structure, there are few, if any, studies on the ROI in pre-apprenticeship programs. However, the direct linkage between pre-apprenticeship and Registered Apprenticeship points to many of the same benefits for all participants and interested parties. As general and skilled worker shortages can overwhelm employers looking to attract new employees or train new hires, pre-apprenticeship programs leading to Registered Apprenticeship expand and strengthen the recruiting pipeline for employers, yielding higher skilled and better prepared employees. The higher retention rates and lower attrition rates attributed to registered and pre-apprenticeship increase the ROI of these programs, and ultimately decrease the money employers spend on recruitment and replacement worker training. Employers benefit in many ways from a more diverse workforce, and just as pre-apprenticeship unlocks opportunities for workers, it also unlocks the employer's potential to grow their workforce through diversity.

One of the most valuable aspects of pre-apprenticeship is the accessibility of these programs by a diverse talent pool, providing more equitable access to a career skills training pipeline and to highly rewarding, in-demand, long-term careers for workers. Recruitment into these programs can be targeted toward specific groups, such as women, people of color, veterans, or even youth, providing an early access gateway with very low barriers of entry into Registered Apprenticeship. At the same time, it is important that pre-apprenticeship not act as a barrier, or be the default pathway, to registered apprenticeship for individuals from underrepresented communities who qualify directly for a RAP and do not need pre-apprenticeship for that purpose. In addition to the high job satisfaction and sense of self that comes with good pay,

⁸ See ROI studies available at <https://apprenticeship.workforcegps.org/resources/2017/08/29/12/43/Expanding-Apprenticeship-Return-on-Investment-ROI> (last accessed Apr. 19, 2022).

benefits, and potential for advancement in a meaningful career, these programs provide the necessary training with very little to no student debt. They foster a career development strategy to lifelong growth within industry. Both pre-apprenticeship and Registered Apprenticeship should be viewed as equal in dignity to higher education, and for many, an even better opportunity.

A benefit to the government and national economy of pre-apprenticeship is that such training helps close the national skills gap, meaning we will rely less on outsourcing, and the increased earnings will lead to increased income tax revenues.

While pre-apprenticeship activities aim to ultimately lead to a long-term, meaningful, middle-skilled career, it is only through entry into Registered Apprenticeship that these objectives truly can be fulfilled. As such, building bridges to RAPs into pre-apprenticeship programs is key to their success as a workforce development strategy.

Finally, the Subcommittee is aware of the administration's existing plans to invest more in pre-apprenticeship and supports those plans. To that end, final passage of H.R. 447, the National Apprenticeship Act of 2021, in the 117th Congress would expand opportunities for and access to pre-apprenticeships, among other items. Relatedly, planned increased investments in transportation and infrastructure could be used to support and expand pre-apprenticeship.

Recommendations

Primary Recommendations

CLARITY

Recommendation 1: More clearly define “pre-apprenticeship” to ensure programs align with quality metrics

Before pre-apprenticeship truly can be used as a tool to increase participation in registered apprenticeship, it needs a clear, widely accepted definition that identifies how pre-apprenticeship fits within a career pathway model and indicates how pre-apprenticeship leads to registered apprenticeship. To arrive at a broadly accepted definition, it must be developed by engaging key stakeholders, including program sponsors, educators, support service providers, policymakers, churches and other community organizations, workforce development boards, and especially employers. Data on existing programs and their impact needs to be collected and analyzed, and using that data and existing guidance—namely TEN 13-12, “Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources”⁹—the definition should be expanded to include all of the following principles.

Pre-apprenticeship programs work alongside other education; dual enrollment programs will be encouraged. Prior training and OJL, including credit earned in high school, CTE, or college

⁹ Available at https://wdr.doleta.gov/directives/attach/TEN/TEN_13-12_Acc.pdf (last accessed Apr. 19, 2022).

programs, needs to be recognized. In addition, a framework of stackable and portable credentials, certifications, and certificates should be encouraged.

Pre-apprenticeship programs are a vehicle for diversity, equity, and inclusion, preparing traditionally underserved populations and those in most need for entry into registered apprenticeship. Targeting youth, women, and minority groups for recruitment into pre-apprenticeship is a key strategy to support equitable and inclusive growth of registered apprenticeship. As such, it will be clarified that pre-apprenticeship does not have any age restrictions (unless required by safety regulations), and youth-focused pre-apprenticeship programs provide early access into the system. Additionally, voluntary compliance with any relevant equal employment opportunity regulations in 29 CFR part 30 will be encouraged as a best practice for pre-apprenticeship programs.

While defining pre-apprenticeship, care must be exercised to ensure it remains flexible. The definition needs to work for all industries, as it is not a one-size-fits-all approach. As such, any definition must encompass both occupation-specific training and more general training (e.g., GED, math, English as a foreign language, employability/transition to work). In other words, it will be inclusive of, but not limited to, occupation-specific training.

The Subcommittee supports “apprenticeship for all” and a minimum of entry requirements for RAPs. In some cases, regulations or employers impose such requirements (e.g., ability to pass a background check or lift a certain weight). The Subcommittee suggests limiting those requirements to the greatest extent possible, while also clearly disclosing them to participants at the pre-apprenticeship stage so they understand the potential impact on their work opportunities.

While engaging the stakeholders noted above, some discussion around the various barriers to entry must take place, including identifying the types of support services or barrier reduction activities needed. Funding wraparound services targeted to ensuring equity in program access will help remove such barriers.

The Subcommittee suggests replacing TEN 13-12 with a new TEN that largely retains the current content, removing only information that is no longer relevant or accurate (e.g., references to outdated resources), yet builds upon it in line with the guiding principles outlined above and other considerations that support DEIA efforts, safety, quality, and consistency.

FLEXIBILITY

Recommendation 2: Provide an alternative validation method (recognition) to manage quality and encourage voluntary (opt-in) compliance with standards

As an alternative validation method to “registration,” voluntary (opt-in) compliance with quality standards, including those set forth in the new TEN, should be encouraged by USDOL and result in “recognition” as a quality pre-apprenticeship program.

The Subcommittee considered the pros and cons of registration for pre-apprenticeship and examined multiple approaches before coming to the decision to recommend voluntary or “opt in” compliance with quality standards, rather than full registration. There were several factors that influenced this recommendation, but the one that carried the most weight was the need for flexibility in pre-apprenticeship. In order to provide for a broader range of programs, such as those that function as apprenticeship readiness training, programs are required to meet the individuals where they are and bring them to the level required to enter into a RAP. As such, they cannot be constrained by the same requirements of registered apprenticeship. Additionally, this flexibility allows for more local control to better meet the needs of employers, program sponsors, and individuals. It also gives the option to offer credit for an academic component of a pre-apprenticeship (badging) even if work-based learning is not offered alongside that academic component. Further, programs will have flexibility to make some decisions about pre-apprenticeship endorsements within government-issued policy. Voluntary recognition could be encouraged as a potential differentiator from unrecognized programs when applying for grants, or in marketing and recruitment efforts.

While registration of pre-apprenticeship would help to ensure quality, the additional restrictions resulting from compliance requirements could create more barriers to entry for pre-apprenticeship programs and reduce the effectiveness of programs designed to help prepare individuals for registered apprenticeship. Additionally, there would be a new compliance-related burden on USDOL for these programs, which would draw resources away from registered apprenticeship. As the Subcommittee recommends pre-apprenticeship programs be linked to RAPs, this would be a duplicative and unnecessary administrative effort. In addition, State apprenticeship agencies can develop frameworks or provide additional guidance for recognition decisions.

Maintaining the status quo was also briefly considered. However, making no changes to the system would likely yield the same results currently experienced (underutilization of pre-apprenticeship). Additionally, under the voluntary recognition model, programs that did not choose to opt in would essentially uphold that status quo.

Additional Recommendations

INCLUSION

Recommendation 3: Promote applicant pool diversification for pre-apprenticeship in service to diversifying registered apprenticeships

Use Federal dollars from USDOL and other sources to focus on uplifting individuals from talent pools that historically have been underserved by pre-apprenticeship and registered apprenticeship (e.g., WIOA in-school youth) as a skilling method and an on-ramp to registered apprenticeship for those who are not yet ready to enter RAPs directly.

GRANTS

Recommendation 4: Prioritize employers and RAPs that invest in pre-apprenticeship

Leverage Federal grants to prioritize funding for employers and RAPs that choose to offer conditional offers of Registered Apprenticeship employment at the start of a pre-apprenticeship program, pending successful completion of the pre-apprenticeship. If direct entry into a RAP is impossible, at minimum, employers and RAPs should endeavor to provide job interview opportunities upon completion of the pre-apprenticeship program. (Note: The Subcommittee does not support the use of funds to subsidize employers' payroll costs.)

COLLABORATION

Recommendation 5: More intentionally coordinate CTE pre-apprenticeship efforts and funding between the Departments of Education and Labor

From outcome goals, evaluation systems, language/definitions, employer outreach, and overall coordination, two key investors in pre-apprenticeship—ED and USDOL—must coordinate resources, staff, and grantees to eliminate frustration among employers and the partners that operationalize these efforts on the ground (e.g., intermediaries, related technical instruction providers).

AWARENESS

Recommendation 6: Provide funding to support promotion, awareness, and uptake of pre-apprenticeship

Such funding would help individuals understand pre-apprenticeship's benefits and how to get involved, whether as a participant, employer/program sponsor, intermediary, or in another role. Some specific items this funding could support are tools for school counselors and teachers to integrate pre-apprenticeship into curricula and offer advice and education to students about pre-apprenticeship as part of a career pathway; resources to connect employers, schools, students, and parents to achieve greater buy-in around pre-apprenticeship; and a retooling of *Apprenticeship.gov* to educate the public about pre-apprenticeship and highlight pre-apprenticeship opportunities.

MARKETING

Recommendation 7: Create a "Pre-Apprenticeship Friendly" marketing program to encourage employers to hire and RAPs to recruit pre-apprentices

In an effort to stimulate interest in pre-apprenticeship and encourage participation in the system by both program sponsors (including intermediaries) and employers, a multi-faceted tiered marketing and recognition program could be created. The program should include images of women, people of color, people with disabilities, and people of varying ages, and a significant portion of the marketing should be targeted at audiences who historically have been excluded from registered apprenticeship, such as inner-city schools and churches in underserved communities.

The program could be open to employers that meet minimum thresholds for hiring and retention of recent pre-apprenticeship program completers, or currently enrolled pre-apprentices, and provide multiple tiers for employers with higher metrics. Likewise, program sponsors (or RAPs) that provide for direct entry for program completers or register a minimum number of apprentices who previously completed a pre-apprenticeship also could be recognized through a tiered system. Programs or employers could distinguish themselves and their level of participation through branded logos or taglines, such as "Pre-Apprenticeship Friendly Employer" or "Pre-Apprenticeship Friendly Apprenticeship," in marketing materials, on websites, or in commercials.

Additional incentives could be provided for employers and programs by connecting them to determination for eligibility for government-funded opportunities or through tax credits for employers that develop/sponsor pre-apprenticeship programs or hire pre-apprenticeship program completers. Program sponsors that participate could gain advanced standing for grant eligibility or other funding opportunities.

Conclusion and Next Steps

The ACA's deliberations over the past few months – from the first full meeting of the ACA in October, through the intervening months leading up to the presentation of this Interim Report – covered a wide range of topics related to Registered Apprenticeship. ACA members brought their unique perspectives as apprenticeship stakeholders in the employer, labor, and public sectors to discuss what makes Registered Apprenticeship successful, how to improve it, and how to expand and modernize Registered Apprenticeship going forward. This Interim Report contains important recommendations for the Secretary of Labor to consider in expanding Registered Apprenticeship into new industries, promoting apprenticeship as a viable and attractive career pathway, achieving DEIA goals, and ensuring that apprenticeship continues to work well as a workforce development tool for employers and job seekers. Apprenticeship carries important benefits for all its stakeholders – from helping employers find workers with the skills and training they need, to helping apprentices develop their skills and increase their employability – and the ACA believes that an expanded, modernized Registered Apprenticeship system that is inclusive of historically underserved populations will yield ongoing economic benefits and contribute to economic growth in the United States.

Some of the issues discussed in this Interim Report will require further deliberation and refinement; for example, the ACA believes it is important to continue to work with OA to determine the best way to strengthen wage standards and other hallmarks of apprenticeship quality within Registered Apprenticeship. The ACA is interested in following OA's efforts to expand apprenticeship into new industries and to reach diverse populations. Building on the recommendations contained within this Interim Report, the ACA can continue to assist OA as it develops apprenticeship outreach and onboarding strategies. Refinements of and further deliberations on the important issues discussed in this report will be reflected in the ACA's Final Report to the Secretary, to be delivered in 2023. Going forward, the ACA is eager to work closely with the Secretary of Labor and USDOL to further develop and refine these recommendations, consider the best ways to implement recommendations, and otherwise pursue improvements to Registered Apprenticeship and workforce development in the United States.

Interim Report Appendix I: Subcommittee Issue Papers

Interim Report Appendix I.a: Increasing Diversity, Equity, Inclusion, and Accessibility in Apprenticeship Issue Paper

Interim Report Appendix I.a.1: DEIA Subcommittee Background

Guiding Questions:

The DEIA Subcommittee members agreed to use the following five questions to guide their deliberations:

- **OVERALL PROCESS:** What are the 3-5 most impactful actions the Department can take to ensure equity is embedded broadly across the national apprenticeship system and that the Department's goals for diversity, equity, inclusion, and accessibility can be achieved?
- **INDUSTRY DEMAND:** How can we better position Registered Apprenticeship as a DEIA strategy for industries that are seeking to diversify their workforce and those that are not, particularly those industries that may be new to apprenticeship?
- **SUPPLY-SIDE BARRIERS:** What challenges do underserved and underrepresented communities face during the apprenticeship process and what plans for support should we put in place to ensure these participants can access, persist, succeed, and complete apprenticeship programs?
- **STRATEGIES:** What innovative DEIA strategies and models can we use on a local, statewide, regional, and national level to improve outreach and engagement connecting industry in well paid, sectors with job seekers in underserved and underrepresented communities?
- **INVESTMENTS:** What are the most critical investments USDOL can make to support DEIA in apprenticeship and how should we measure, monitor, and assess success? Are there specific federal workforce programs that should be leveraged to support these equity strategies (e.g., WIOA funding to support pre-apprenticeship)?

The subcommittee agreed to incorporate responses to **STRATEGIES** and **INVESTMENTS** into each of the first three questions and provide specific recommendations addressing policy changes, investment plans, and technology and data innovations in the issue templates.

Executive Summary:

The DEIA Subcommittee identified the following key issues:

- **Overall Process:** Equity is not embedded broadly or deeply enough across the national apprenticeship system (broadly defined to include intermediaries, sponsors, etc.). If equity were better embedded, the Department could better achieve its goals for diversity, equity, inclusion, and accessibility.

- **Industry Demand:** Many companies/industries lack awareness of Registered Apprenticeship Programs (RAPs) and may not see apprenticeships as a viable solution to achieving DEIA strategies for their workforce and talent pipelines.
- **Supply-Side Barriers:** Individuals from underserved communities often experience barriers to gain access to, to succeed in, and to complete apprenticeship programs. These barriers include: lack of awareness of apprenticeship opportunities, lack of necessary skills or qualifications, language barriers, lack of resources to participate in programs, and discrimination and harassment.

The Subcommittee also wishes to emphasize two overall points:

- 1) Recommendation that policy makers invest sufficient resources in the Office of Apprenticeship (OA) and the State Apprenticeship Agencies (SAA) to accomplish the Subcommittee's objectives.
- 2) Recognition that the general plans will need to be adapted to the specific needs of the members of different underserved communities – one size does not fit all.

Additional Read-Ahead Materials:

Issue templates and additional supplemental materials are included as read-ahead materials as well as a one-page summary of OA DEIA metrics and goals including discussion of CFR 29.30 and a five-page briefing on DEIA in Registered Apprenticeship Programs.

Interim Report Appendix I.a.2: Overall Process

Issue and Background:

Equity is not embedded broadly or deeply enough across the national apprenticeship system. If equity were better embedded, the Department could better achieve its goals for diversity, equity, inclusion, and accessibility.

Recommendations and Best Practices:

The national apprenticeship ecosystem should put a high priority on improving programs' implementation of existing DEIA requirements (29 CFR part 30) as a primary means of embedding DEIA into the DNA of RAPs and Registration Agencies.

- Recommendations for policy changes
 - OA and SAAs should undertake frequent program reviews (sometimes known as "audits") during which OA staff review programs' progress and provide actionable technical assistance. For example, it could help programs be more successful at reaching/recruiting underrepresented communities if OA and the SAAs went out to show RAPs and training centers how they could improve their outreach and recruitment. Program reviews fulfill educational purposes. Programs should be reviewed after first year of operation; after second year, for affirmative-action plans; and again at least every 3 years.
 - OA and SAAs should put a high priority on planning for EEO when helping RAPs develop their standards and initially register their programs.
 - OA should remove administrative barriers to make 29.30 implementation as easy as possible for RAPs (for example, Universal Outreach Tool, Demographic Analysis Tool, and Affirmative Action Plan Builder).
 - OA/SAAs should improve discrimination-complaints investigative processes.
- Recommendations for USDOL investment
 - OA should use funding to incentivize representation of, specifically, women, POC, and IWDs among apprentices in sectors where these groups are underrepresented. Don't dilute with too many priority groups (in other words, include only the underrepresented populations mentioned above), and don't mask issues with particular groups by aggregating them (in other words, measure each group's participation separately).
 - OA should fund grantees to actively educate RAPs (including JATCs), employers (including managers and mentors and others who work with apprentices), apprentices, higher education, and other apprenticeship stakeholders about DEIA practices (including nondiscriminatory selection processes such as competency-based hiring, outreach and recruitment practices, and retention) through, for

example, a series of handbooks. Make sure that all RAPs are aware of DEIA requirements and best practices.

- Recommendations for innovation
 - OA and SAAs should use data from RAPIDS, Program Standards, and program reviews to prioritize program reviews, geographic areas, and industries to determine needed resources, including investments, and training. Demographic data should be made public on a dashboard site.
 - OA should make existing technology tools (UOT, DAT, Apprenticeship Jobs Finder) more useable.
 - OA should enhance its technology usage by using strategic social media and networks marketing to increase awareness and produce PR marketing videos strategically targeted to underserved groups.
- Other relevant items the subcommittee wants to report for ACA consideration
 - OA should work with OFCCP to strengthen contractor/subcontractor requirements for DEIA in the construction industry and other industries where apprenticeship occurs to increase demand for apprentices from underrepresented groups.

Issue on Overall Process Supplemental Information

Additional Recommendations Under Consideration for Innovation (Data and Technology):

- OA and the SAAs should use data from RAPIDS, Program Standards, and audits to help prioritize what programs, geographic areas, industries to determine needed resources and training.
 - Review existing data for breakdowns of apprentice percentage by sex/race/ethnicity/disability status (as reported in RAPIDS) by trade, by SOC code, by industry, by State, by region
 - Consider gathering new data on programs' needs through formal, representative surveys (not just anecdotes)
 - OA should make the RAPIDS-data breakdowns of apprentice percentage by sex/race/ethnicity/disability status available to the public through a "big data" dashboard.
 - OA should use RAPIDS, program review, complaints, and program data to help prioritize what programs, geographic areas, and industries to review.
 - OA should use RAPIDS, program-review, complaints, and program data to inform its investment decisions.
 - OA should enhance its technology usage by using strategic social media and networks marketing to increase awareness and producing PR marketing videos

strategically targeted to underserved groups (such as short media clips of companies showcasing underserved groups in their apprenticeship programs).

- OA should help RAPs track and monitor applications to their programs (perhaps by making available dashboard tracking-software for this purpose).
- OA should use and expand the USDOL-supported web portal of SkillsCommons (<https://www.skillscommons.org>) for apprenticeship resources: <https://www.skillscommons.org/discover?query=apprenticeship>.

Additional Recommendations Under Consideration for Government Partnerships:

1. OA should work with OFCCP to strengthen contractor/subcontractor requirements for DEIA in the construction industry and other industries where apprenticeship occurs to increase demand for apprentices from underrepresented groups.
 - In particular, OFCCP's goals applicable to construction need updating to align them better with current Supreme Court precedent on affirmative action. Specifically, the 6.9-percent participation goal for women, applicable nationwide, is too low in many places and for many trades. The numeric participation goals for minorities aggregate the minority racial and ethnic groups together, masking underrepresentation of individual race or ethnic groups. The minority goals are also based on the 1970 Census. The goals should also be determined based on measures that do not lock in the current representation of a group, because current representation reflects years of discrimination, and the current good-faith standard should be strengthened.
 - Apprentice utilization goals by trade should be established for construction workforce to ensure that entry-level jobs are available on federally contracted and federally assisted construction work.

Processes and requirements for large infrastructure projects ("mega-projects") should be established. These should include requiring projects to establish and provide resources for regular community input information about goals and to make information about the progress that contractors make toward their goals to be available to the public, so that community groups can monitor participation in real time. They should also include requiring federal agencies to include contractors' participation in mega-projects and adherence to their Affirmative Action Plans as a bid condition and in their contracts.

Interim Report Appendix I.a.3: Industry Demand

Issue and Background:

Many companies/industries lack awareness of Registered Apprenticeship Programs (RAPs) and may not see apprenticeships as a viable solution to achieving DEIA strategies for their workforce and talent pipelines. Stronger employer participation and engagement in apprentice screening, selection may increase apprentice alignment to hiring requirements, increase retention and result in career progression.

Recommendations and Best Practices:

Increasing industry demand for registered apprenticeships to achieve DEIA goals creates a win-win for employers, apprentices, and underserved communities.

- Identification of relevant best practices
 - Make the case for employers to leverage DEIA and RAPs as key strategies to meet the demand for a highly skilled workforce tapping into an increasingly diverse labor pool
 - Invest in high schools that hire career school counselors that successfully identify, recruit, and develop integrated partnerships to include long term strategic plans, co-creation of curriculum and co-branding opportunities with employers.
 - Collaborate with Department of Education/Career and Technology Education (CTE) and the Technical College system, community colleges, and minority-serving institutions (MSIs) to become part of the community to promote apprenticeships as a viable work-based learning options for students and their families
 - Expand partnerships and outreach to local workforce centers and community-based organizations (CBOs) to create or expand talent pipeline in the local market (i.e., dislocated workers)
 - Create partnerships with local businesses, including minority-owned businesses (MOBs), in diverse school locations that foster career exploration and opportunities to explore career clusters
 - Education: Increase awareness/change perceptions at high schools, community/technical colleges, MSIs
- Recommendations for policy changes
 - Consider leveraging Federal procurement requirements to increase demand for apprentices from diverse populations.
- Recommendations for USDOL investment

- Incentivize high schools with funding to partner with RAPs to include goals that focus the percentage of completers and recognition via signing days.
- Provide incentives to employers that hire and train apprentices while enrolled in targeted workforce development programs that are connected with RAPs.
- Provide incentives to sourcing pools for retention beyond initial employment through completions of the apprenticeships.
- Enhance tracking, data and analytics to demonstrate benefits of registered apprentice to DEIA strategies, employee retention, and career progression.
- Continue to invest in engaging business/trade associations/unions to promote and play a role in developing registered apprenticeships as part of their DEIA strategies in both traditional and emerging industries.
- Recommendations for innovation
 - [Leap - Microsoft Leap Apprenticeship Program](#) – link programs like this into the schools.

Issue on Industry Demand Supplemental Information

Other Recommendations Under Consideration Related to High Schools and Colleges:

Educational programs in high school don't support the direct movement to emerging company sponsored apprenticeships. Apprenticeships are not considered practical options for students and suffer from the stigma that they are something less than a four-year degree. This is evidenced by State and national statistics that measure high school success on college attendance while ignoring apprenticeships in any statistical data. Additionally, high school counselors don't realize apprenticeships are more than a trade occupation and often present higher wages than four-year graduates.

According to BLS, 66.2 percent of high school graduates enroll in college (only one-third will graduate in 4 years). In addition, they will also have approximately \$31,000 in student loan debt. If school counselors promoted the vast array of apprenticeship programs, additional high school graduates from underrepresented communities could have a well-paying career with no student debt. The apprentice experience can often accelerate the student's pathway towards proficiency in a career, fill the workforce void and support DEIA strategies creating a win-win for both students and employers.

- Provide tax incentives to employers that hire and train apprentices after high school graduation
- Set goals for percentage of students signing and completing apprenticeships
- Provide incentives to sourcing pools for retention beyond initial employment through completions of apprenticeships
- Create partnerships with local businesses in diverse school locations that foster career exploration and opportunities to explore career clusters

- Intake options for emerging industries to manage pipelines
- Expand screening opportunities for employers. How do we do more than the schools are doing for us?
- Rubrics that include what employers need to help select students

Other Recommendations Under Consideration Related to Government:

Federal contracting requirements are another lever for increasing demand for diverse workers. There are slightly different requirements for supply-and-service contractors¹⁰ and for construction contractors. Companies that hold federal supply-and-service contracts must assess the availability of qualified women and minorities¹¹ in their communities and make good-faith efforts to ensure that their employees in each job group reflect those community percentages. Companies that hold direct federal or federally assisted construction contracts must make good-faith efforts to reach prescribed goals for their construction workforces (6.9 percent for women, and varying percentages that depend on geographic location for minorities). Both types of contractors must strive to meet a 7-percent goal for individuals with disabilities (IWDs).¹² The ultimate sanction for failing to comply with these obligations is debarment from federal contracts. OFCCP, which is part of USDOL, enforces these requirements.

These requirements can provide strong incentives for federal contractors to hire apprentices who are women, minorities, and IWDs. That is because apprentices are entry-level jobs: apprentices don't need to already have the skill level of a journeyworker, since they will be trained on the job; the only qualifications that apprentices need to have are the minimum qualifications for entry into the apprenticeship program (such as a high-school degree/GED). Moreover, apprenticeships are a way for companies to hire employees who are outside their core crews or existing workforces, and thus who represent a broader cross-section of the workforce in a contractor's community. Thus, it can be in a contractor's interest to hire as many apprentices as applicable trade or State journeyworker-to-apprentice ratios allow.

Although the requirements for appropriate representation of women, minorities, and IWDs in contractors' workforces are written into federal contracts, many contractors are not aware of them, and OFCCP is only able to check on whether contractors are implementing the requirements in a fraction of the hundreds of thousands of federal contracts.

- Federal agencies and State DOTs that let covered contracts should ensure that every contractor is aware of the goals for women, minorities, and IWDs, and makes their

¹⁰ Requirements apply to subcontractors under federal contracts. For this discussion, the word "contract" refers to federal contracts and include "subcontracts" on those contracts, and the word "contractor" refers to federal contractors and include "subcontractors" on those contracts. In construction, companies contracting with State DOTs receiving federal DOT grants are covered.

¹¹ "Minority" includes Hispanics, Black/African Americans, Asians, Native Hawaiian/Pacific Islanders, Alaska Indians/Alaska Natives.

¹² These requirements cover contractors that have at least 50 employees and \$50,000 in federal contracts.

subcontractors aware of them as well. These agencies should also educate the contractor community about how Registered Apprenticeship can help them meet their goals.

- Working with the Office of Apprenticeship, OFCCP should ensure its staff are familiar with Registered Apprenticeship and how contractors can use Registered Apprenticeship to increase inclusion of women, people of color, and IWDs.
- To maximize its limited resources, OFCCP should conduct a data-driven program of strategically targeted, timely, frequent, and effective compliance reviews and complaint investigations whose results are publicized in the regulated community.

Other Recommendations Under Consideration:

Sponsoring Business:

- Promote a targeted marketing plan to showcase how diversity, equity and inclusion elevates businesses.
 - According to the U.S. Chamber of Commerce, merchants that increase diversity and inclusion in the workplace have 19 percent higher innovation revenues, have a 35-percent performance advantage over their homogenous counterparts, and are 36 percent more profitable.
 - The American economy can gain \$8 trillion by 2050 by closing the racial equity gap. (U.S. Chamber of Commerce, "Closing the Racial Equality Gap Would Generate \$8 Trillion in U.S. GDP Growth" (Apr. 25, 2020), <https://www.uschamber.com/on-demand/economy/closing-the-racial-equality-gap-would-generate-8-trillion-in-u-s-gdp-growth>.)
- Engaging business/trade associations in emerging industries to promote and play a role in developing registered apprenticeships for their employer members as a part of the business/trade associations DEIA strategies and goals.
- Provide unemployed workers incentives to go into an apprenticeship program. Bonuses and/or pay workers \$5+/hour on top of a worker's wage for a period of time/housing subsidy for several months
- Provide tax incentives for new businesses that hire apprentices and make it easy to do this. (For instance, the AZ@Work plan was arduous. By the time I had the information Arizona requested; the apprentices only had a few months left in their program and we were going to have to report their hours every week along with documentation in order to get ~\$500 a week per apprentice) – Traditional grants are also difficult to navigate
- American Council on Education accreditation for "OJL review" is ~\$25,000. Provide grants to offset this cost for the business
- Provide incentives to community colleges that receive federal funding to work with businesses in curriculum development. (For example, in lieu of Philosophy 101- create a Critical Thinking 101 course)

- Educate industry leaders regarding the new apprenticeship grant payment process for technical/community colleges – expenses are charged by the technical college on behalf of the apprentice aligned to the business
- Educate industry leaders to use apprenticeships as career development that positively impacts retention outcomes
- Educate industry leaders that apprenticeship is a win: win financially for the participant and the business. No upfront cost for the apprentice; cost avoidance to their tuition assistance benefit
- Industry leaders can utilize their current job profile/descriptions to create OJL that aligns with education standards as well as new employee orientation
- Provide business case to demonstrate employee turnover is more expensive than cost to upskill current employees
- Provide information to industry leaders that apprenticeships aligned with technical/community colleges are cost effective and builds the apprentices' confidence to seek additional education

Workforce Boards:

- Build awareness of emerging apprenticeships to attract funding and diverse populations in the local workforce
- Represent our needed skill sets, career paths, compensation structures, and business involvement in apprenticeship offerings
- Attract diverse group of workers transitioning between industries and dislocated workers

Business to Business Pipelines:

- Build direct pipelines from RAPs to companies that promote educational benefits or "first job" benefits. i.e., Amazon Career Choice, McDonald's First Job programs
- Partner with employer councils, chamber of commerce, non-profit organizations to build community pipelines
- Build brand awareness on business commitment to DEIA in the organizations and how apprenticeships are a tool to creating pipelines

Interim Report Appendix I.a.4: Supply-Side Barriers

Issue and Background:

Individuals from underserved communities often experience barriers to gain access to, to succeed in, and to complete apprenticeship programs. These barriers include: lack of awareness of apprenticeship opportunities, lack of necessary skills or qualifications, language barriers, lack of resources to participate in programs, and harassment and discrimination.

Once individuals become apprentices, the current system suffers from problems in three main areas: a lack of mentorship and training support, insufficient wrap-around services, persistent bullying, harassment and intimidation in some industries and a reporting process on the part of the employer that can feel burdensome and complex.

Recommendations and Best Practices:

Enhance training and support of apprentices along the journey to ensure completion of program, ensuring they have their basic needs met through wraparound services and address areas of concern especially around harassment, discrimination, or bullying.

- Identification of relevant best practices
 - Expand recruitment and outreach to increase awareness and overcome the stigma of apprenticeship by reaching out to underserved communities to change perceptions about apprenticeships and enhance awareness of RAP benefits
 - Address critical areas of concern around harassment, discrimination, and bullying, which may be especially prevalent in specific industries
 - Create a culture of inclusion before, during, and after the apprenticeship process.
- Recommendations for policy changes
 - Utilizing federal grant funding to provide apprentices with a stipend used for wraparound services (transportation, childcare, purchasing specialized equipment or attire) in addition to what WIOA currently provides.
 - If WIOA funds are available, help employers more easily access these funds to provide wrap around services and increase awareness of the existence of these funds.
 - Consider eliminating aptitude tests for applying apprentices, which may be a barrier for some, particularly in some industries.
- Recommendations for USDOL investment
 - Invest in workforce readiness and pre-apprenticeship programs
 - Enhance training and support of apprentices to ensure access and completion of program by meeting need for wraparound services: stipends for childcare, transportation, equipment, etc.

- Recommendations for innovation
 - Establish relationships with trade associations, unions, community organizations, and businesses and provide training help to meet the need for mentorship and support throughout the apprenticeship
 - Equipment and access, partnerships with: libraries, AJCs, Job Corps, career technology centers, MSIs

Supplemental Information

Other Recommendations Under Consideration Related to Continued Discrimination or Failure to Provide Required Equal Employment Opportunity:

OA must do a more effective job of educating RAPs about what is required under 29.30 and must review RAPs more effectively to see if they are implementing 29.30.

1. Implement stronger DEIA training for employers and mentors to cover topics such as: (29.30 currently requires RAPs (and employers) to provide some of this training, including basic information about the RAPs' EEO policy and anti-harassment training. One problem here is bare-bones requirements and failure for those requirements to be implemented)
 - cultural competency; inclusivity; bias awareness; anti-discrimination law; managing difficult conversations with diverse populations (including race/ethnicity, gender identity/expression); dealing with microaggressions or unconscious biases
2. Training may not be equal for women and POC. Some journeymen do not train equally and equitably
3. Bullying, harassment, and intimidation
4. Lack of anti-harassment training
5. Hazing by journeyman on jobsites
6. PPE that fits each individual, big or small
7. Lack of outreach
8. Indiscriminate work hours - paid the same hourly, but less hours
9. Women and POC must prove their skills repeatedly. It is assumed simply because of your gender or race that you do not have skill. Men are assumed to have skill and must prove otherwise
10. When issues come up on jobsites many times the woman will be moved to another job or laid off vs. the aggressor

Additional Recommendations Under Consideration:

11. Streamline and simplify the registration process (need to distinguish between process for apprentices to become registered apprentices, or for apprenticeship programs to register with OA or their SAA)
12. Ensure simplified, culture-agnostic language on apprenticeship is relayed
13. Lack of understanding of cultural norms for underrepresented groups
14. "Good faith effort" is not always good faith (standard of "good faith" is too low?)
15. Mentorship outside of jobsite
16. Lack of support
17. Separate washroom facilities
18. Last hired/first fired

19. Promote the use of federal grant funding to use towards transportation/childcare costs
 - Childcare for early hours in construction/childcare for class when it is at night
 - Transportation and childcare issues prevent them from getting to their employer/job shadow, etc.
20. High schools lack vocational-technical training
21. Influence high school career counselors to encourage apprentice options and partner with those businesses
22. Incentivize high schools with funding to partner with emerging RAPs
23. Fund organizations that can best influence high schools and potential candidates
24. Deal with the stigma that an apprenticeship is something less than a four-year degree
25. Supply high schools with qualified instructors that best represent the industries diversity, quality, and equitable work environments that apprenticeships offer
26. Offer college credit for pre-apprenticeship or youth apprenticeship participation
27. Recruit students directly into apprenticeship programs and market the offerings pre-acceptance
28. Allow college credit for OJL opportunities not unlike on campus labs
29. Develop technical curriculum teaching 21st century skills in institutions and supply qualified adjunct professors
30. Integrate the offerings into first year college curriculum
31. Co-brand learning with employment
32. Partner with targeted HBCU's, demographically diverse colleges, and multi-cultural clubs
33. Educate parents on apprenticeship. Work while you earn in building trades unions are also earning college credit
34. Journeymen are not trained to train/mentor
35. Lack of Paid Maternity Leave. You should not have to choose between growing your family and not having a paycheck. Very few building trades unions have paid Maternity leave. The Ironworkers do, the painters do. (In some States, employers must provide paid family/medical leave, and not doing that would be unlawful.)
36. No paid time off
37. OSHA - workplace violence
38. Inability to buy tools and proper construction clothing to start
39. The process is complex and time consuming (need to elaborate which process)
40. Access to reliable resources in underpopulated areas (i.e., high speed internet)
41. Disproportionate access to higher education opportunities

Interim Report Appendix I.b: Apprenticeship Modernization Subcommittee Issue Papers

Interim Report Appendix I.b.1: Apprenticeship Quality

Registered Apprenticeship is known as the “gold standard” workforce development strategy for career seekers and industry leaders. Registered Apprenticeship’s focus on employment and training in highly skilled occupations with progressive wages through structured OJL, related instruction, and recognized credentials has been a recipe for success. As we look to expand Registered Apprenticeship and modernize it across more industries and occupations, it is important that we look at what has made it successful and what can be built upon.

Background

What is core to Registered Apprenticeship? How do we best expand and protect what “apprenticeship”? As more stakeholders have entered the apprenticeship space, it is important to emphasize and build upon the quality aspects of Registered Apprenticeship as it continues to grow. How do we lift up high-quality programs and avoid programs using the term “apprenticeship” to describe a program that does not adhere to the core tenets of Registered Apprenticeship? How do we best ensure that current apprenticeships - and any new programs established via apprenticeship expansion - lead to great jobs and family-sustaining careers upon completion of the program?

We view these as core elements of a quality RAP:

- Work-based learning with progressive wages
- Nondiscrimination and intentional DEIA efforts – creating a culture of inclusiveness and belonging for all
- Community engagement in recruitment of apprentices
- Completion of the program leads to family-sustaining wages and a long-term career with opportunities for advancement
- Workers (apprentices and journeypersons) have opportunities to voice workers’ (nonmanagement) concerns, preferences, feedback, thoughts on safety, training, program expectations, curricula, etc. with respect to apprenticeship programs in which they participate
- Offers an industry-recognized credential

Registered Apprenticeship currently is structured through three different methods of acquiring proficiency in occupations: *Time-based*, *Competency-based* and *hybrids models* (a combination of a range of time and measured through competency). How do we identify the appropriate delivery method (time-based, competency-based, or hybrid) to appropriately upskill the registered apprentice is generally based on industry demand and employer preference? How do we determine whether apprenticeship programs in different occupations/industries should focus on time or competency, or an appropriate combination of both? There have been some criticisms of a strict time-based approach, since it does not involve a measurement of a worker’s

progression, while measuring solely based on competency provides some risk for how apprentices are determined proficient and competent in an occupation, potentially short-changing the critical OJL obtained through employment. Does the right measure of “competency” achieve goals related to equality in programs given online vs. in-person?

Interim, transferrable, and portable credentials: How do we best establish a framework of interim credentials that allows potential apprentices to build credits toward completion of an apprenticeship program, mastery of a skill, or other essential job facets like safety, EEO issues, incremental OJL milestones, and others? Relatedly, how do interim/transferrable/portable credentials influence the relationship between educational institutions, apprenticeship programs, and employers? How do we ensure that interim credentials lead to increased job mobility for an increasingly mobile talent pool, and how do we position an interim credentials framework to enhance the attractiveness of apprenticeship programs?

Consistency and standardization: How do we achieve industry-wide and nation-wide consensus on credentials, competency vs. time-based training programs, and other aspects of apprenticeship quality. Are there State and regional differences to consider? Are there occupational- or industry-specific differences to consider?

Online learning: How do we best develop standards for programs that will occur primarily (or partly) in an online setting, including ensuring equality between in-person and online programs? With the expansion of online learning, we must also take into account the digital divide between those who have easy access to the Internet and those who do not – the latter of whom are more likely to be from underrepresented populations.

Opportunities

- Ensure greater attention and investments in RAPs are focused on expanding and growing on bona fide/high-quality programs, and enhanced criteria around quality and labor standards so RAP is not about programs chasing grant funds, but long-term industry investments in their workforce.
- Ensure policy and program updates that enhance Registered Apprenticeship’s reputation as the highest quality standard for workforce development:
 - Greater use of on-line learning, but how do we ensure it is quality and equitable?
 - How do we measure competency and proficiency, while ensuring RAPs are leading to long-term careers and not just short-term training?
- The appropriate amount of online learning versus in person varies across sectors. COVID-19 afforded colleges, companies, and apprentices the opportunity to push boundaries and identify how much online versus place-based teaching was appropriate.

Interim Report Appendix I.b.2: Apprenticesability

"Apprenticesability" refers to the suitability of an occupation for apprenticeship. Per USDOL's current apprenticeship regulations, apprenticeable occupations: (1) involve skills that are customarily learned in a practical way through a structured, systematic program of supervised OJL; (2) are clearly identified and commonly recognized throughout an industry; (3) involve the progressive attainment of manual, mechanical, or technical skills and knowledge that, in accordance with the industry standard for the occupation, would require the completion of at least 2,000 hours of OJL to attain; and (4) require related instruction to supplement OJL.¹³

Background and Opportunities

Policymakers considering expanding and modernizing the Registered Apprenticeship system must consider apprenticesability of new occupations entering into the system. This consideration should include ensuring occupational integrity, job mobility, and the creation of new RAPs that lead to careers in occupations providing family-sustaining wages. Policymakers must also consider any adverse impacts on apprenticeship programs for established industries and occupations and whether an occupation is overly specialized to the degree it limits an apprentice's ability to work consistently throughout the year, and must avoid "splintering" (i.e., creating an apprenticeship program/occupation that is too specific in an occupational subset, or splitting occupations unnecessarily.)

With apprenticeship expansion, there is a need to develop deeper connections with industries newer to apprenticeship (like IT) to gain better understanding of training requirements, best practices, etc. Can the Registered Apprenticeship system be more proactive and less reactive?

Is there potential to use data to identify jobs growing at rapid rates, prioritizing entry points into these sectors/jobs? For example, is there potential to examine USDOL/OA 'certificates' for jobs that have gone unfilled as another starting point for developing ready-made apprenticeship frameworks.

¹³ USDOL's "Criteria for apprenticeable occupations," 29 CFR 29.4.

Interim Report Appendix I.b.3: Data Usage

Data quality is central to any discussions regarding modernization of the Registered Apprenticeship system, and the Apprenticeship Modernization Subcommittee discussed ways to improve data quality, make data collection more consistent across States and stakeholders, and use data more effectively to tell the apprenticeship story. OA has made strides in recent years to improve its data collection and streamline public access to meaningful apprenticeship data – for example, the Registered Apprenticeship Partners Information Data System (RAPIDS) has undergone meaningful improvements in recent years. The Modernization Subcommittee’s recommendations regarding data usage should help guide OA in refining its data collection systems based on feedback from ACA members and their unique perspectives as apprenticeship stakeholders from the employer, labor, and public sectors.

Background and Opportunities

The Modernization Subcommittee organized its discussions on how to improve data quality and usage into two overarching challenge areas:

1. How can we leverage data about apprenticeship programs to tell the apprenticeship story?

There are several ways data can be leveraged to communicate key elements of apprenticeship, including where apprenticeship is successful, and where efforts might be focused to expand apprenticeship into new industries and occupations. The Subcommittee discussed whether there are ways to improve and enhance accuracy in apprenticeship performance reporting and monitoring in order to tell the apprenticeship story more accurately. Apprenticeship stakeholders should be able to easily access and understand data to understand the comprehensive State of apprenticeship programs (including opportunities, uptake, and outcomes) nationwide – for example, apprenticeship sponsors should be able to both understand and communicate their successes and challenges in achieving desired outcomes related to serving diverse populations. Anyone – from sponsors, to current apprentices, to prospective apprentices – should be able to understand the story that apprenticeship data tells, no matter their level of data expertise.

2. How can we encourage stakeholders (Federal players and partners, States, Sponsors, Apprentices) to fully participate in the data collection space?

The Apprenticeship Modernization Subcommittee thinks it is important to achieve consistent and uniform participation in OA’s RAPIDS database by all States and territories, but understands there are State-level regulations that may complicate this process.

In addition to some divergence among States in their apprenticeship data collection behaviors, there are differences in how sponsors or apprentices engage with data collection efforts. The Subcommittee discussed the reasons for this divergence and what might cause it – are there

privacy concerns (Social Security numbers, other personally identifiable information (PII)? Is there uncertainty over how these data are used and why it is collected? Is there a level of reluctance on the part of sponsors to enter data on behalf of apprentices? Grant-funded sponsors may also find it challenging to enter data into multiple systems – RAPIDS and the Participant Individual Record Layout (PIRL) system. Are there ways to streamline these two systems of data collection?

Finally, the Subcommittee discussed challenges related to capturing certain types of data. For example, is disability data captured and kept up to date in the RAPIDS system? Does the system capture outcome data beyond wages, including licenses obtained, associate's or other degrees obtained? Does the system capture the full scope of credentials earned?

There are important opportunities to keep in mind when discussing these challenges in the context of apprenticeship modernization. First, the Modernization Subcommittee believes that OA should seek to fully realize the immense value of a national, uniform data set that provides a comprehensive, uniform view of Registered Apprenticeship in the United States. Modernization of data systems offers an opportunity to enhance performance reporting and monitoring, and to improve communication about apprenticeship opportunities and outcomes.

Interim Report Appendix I.b.4: Procurement/Funding Apprenticeship

Registered Apprenticeship is a premier workforce training program with 85 years of proven experience in the United States. This track record has justified historic investments in the Registered Apprenticeship system at the Federal and State levels through programs such as Davis Bacon, tax credits, and apprenticeship expansion grants. The Modernization Subcommittee has explored methods policy makers should consider leveraging to grow and expand the Registered Apprenticeship model.

Background and Opportunities

The Modernization Workgroup discussed these key questions for exploration regarding both current and potentially new investments in Registered Apprenticeship expansion.

- How to best leverage Federal investments to drive Registered Apprenticeship (RA) expansion? How to leverage the Federal Government's procurement process to drive Registered Apprenticeship expansion and accountability for those receiving Federal investments and contracts to utilize existing or potentially new Registered Apprenticeship programs as a workforce solution and for enhanced accountability (including on program quality, career viability, EEO issues, workplace safety, whistleblower and anti-harassment protections, etc.)
- How to achieve greater coordination and goal-alignment around Registered Apprenticeship expansion across relevant Federal job programs (WIOA, GI bill funds) and Federal agencies (Departments of Education, Transportation, etc.)

There is a historic opportunity to leverage the Federal Government's spending power, whether through dedicated workforce programs, or through other investments and contracting to incentivize Registered Apprenticeship adoption across an array of industries. This is an opportunity to *ensure intentionality* with Registered Apprenticeship expansion, and having the Federal Government drive it through procurement can lead to desired outcomes. The recent passage of the bi-partisan infrastructure bill is a major opportunity to drive Registered Apprenticeship expansion in key infrastructure jobs. Finding opportunities to leverage these historic investments is a unique opportunity for policymakers to incentivize Registered Apprenticeship expansion and quality. For instance, Federal mega projects present the opportunity for the Office of Federal Contract Compliance Programs to integrate with RAP opportunities, and to encourage agency silos to come down and have shared agreements and understanding on the role of apprenticeship in creating long-term careers.

Potentially historic investments in climate jobs could serve as an opportunity to revitalize Registered Apprenticeship as the premier training model. Working with stakeholders on these occupations, identifying and modernizing existing occupations as appropriate, presents an opportunity for Registered Apprenticeship programs to be the tool for training the climate workforce. While most climate jobs are identified as part of existing occupations, is there an

opportunity to use Federal funding to expand existing programs by adding skills developments or special certifications that address the skills needs of climate jobs (for example, using Federal funding to grow existing bus mechanic programs by training apprentices to work on electric buses).

The Modernization Subcommittee's discussions and recommendations on apprenticeships in Federal works projects included references to "apprenticeship utilization goals" – these are described at 29 CFR 30.5:

The purpose of the utilization analysis is to provide sponsors with a method for assessing whether possible barriers to apprenticeship exist for particular groups of individuals by determining whether the race, sex, and ethnicity of apprentices in a sponsor's apprenticeship program is reflective of persons available for apprenticeship by race, sex, and ethnicity in the relevant recruitment area. Where significant disparity exists between availability and representation, the sponsor will be required to establish a utilization goal pursuant to § 30.6.

The Modernization Subcommittee notes that utilization is, essentially, the inclusion of individuals, by occupation, to ensure registration of apprentices occurs in a manner that represents the available workforce in comparison to their representation by race, sex, and ethnicity in the relevant recruitment area. The Subcommittee also noted the difference between utilization more broadly and utilization on specific projects. A utilization requirement on a project refers to the appropriate percentage of labor hours performed by apprentices within a distinct craft or trade. The Modernization Subcommittee's recommendation on this topic would weave diversity and equity language into apprenticeship utilization on a project – see below for example language that the Modernization Subcommittee would support:

"Registered Apprentice utilization requirement" means the requirement that the appropriate percentage of labor hours within each separate craft, trade, or occupation be performed by apprentices of that craft, trade, or occupation on any Federal job. Apprentices in RAPs utilized on Federal jobs must be of a diverse population and must come from a Registered Apprenticeship Program with graduation/completion rates in line with the national average for the craft, trade, or occupation. Regardless of craft, trade, or occupation, the appropriate percentage of labor hours for apprentices in RAPs shall not be less than 33 percent of the project's total.

Interim Report Appendix I.b.5: Apprenticeship Ecosystem

Over the years, the increased adoption and interest in Registered Apprenticeship models has led to a significant increase in stakeholders in the Registered Apprenticeship system. While RAPs are still operated by the sponsor (which can include labor organizations, associations, community colleges, employers, and intermediaries) and registered by either USDOL or a USDOL-recognized SAA, there are many more stakeholders within the overall apprenticeship ecosystem. The Modernization Subcommittee discussed the current Registered Apprenticeship system, including all its stakeholders, and is interested in ways to bring about greater cohesion and system-building to define, increase, and identify opportunities for a high-quality and well-functioning Registered Apprenticeship system.

Background

As Federal investment brings new players and stakeholders into the apprenticeship ecosystem, how do we build a system that includes USDOL/OA, SAAs, any new or emerging Federal agency stakeholders, and both new and existing intermediaries, sponsors, labor organizations, associations, colleges, employers, and job seekers?

The Modernization Subcommittee discussed:

- What is “core” to the USDOL/OA role in registered apprenticeship? What is “core” to the role of SAAs? Individual State laws, regulations and licensing issues in OA and SAA States have led to a system where inconsistencies exist in the Registered Apprenticeship system. Working together, OA and SAA States should pursue maximum alignment in order to build greater system cohesion on quality issues, EEO, and alignment/reciprocity of programs across States.
- Given potential growth and investment, how can we build more system cohesion to ensure that both existing and potentially new programs are “true apprenticeships” pursuing the highest level of quality training for the apprentice, employer and labor market. This means vetting programs to identify if any programs are seeking to register as RAPs for financial reasons, do not have all required OJL or training elements, or otherwise fail to meet standards for quality RAPs.
- How to best ensure that Federal investments/funding gets to the intended recipients (RAPs, apprentices, or potential apprentices in RAPs), including how to monitor (at the Federal and State level) whether funds are distributed effectively and fairly.
- How to best ensure that ‘national’ apprenticeship programs are indeed national – are there misplaced incentives (e.g., WIOA funding incentives) for describing a program as ‘national’, when it is really more local (just regional or statewide)?
- How to manage potential challenges for national employers/programs in navigating different State-by-State requirements for apprenticeship programs. Some States run their own programs other States use the Federal program. This creates a patchwork that

is difficult for employers (especially multistate employers) to navigate, because requirements are inconsistent across States.

- How are State and local workforce boards promoting Registered Apprenticeship through funding, referrals and other means?

Opportunity

There is an opportunity to build a more cohesive Registered Apprenticeship system with greater alignment between OA and SAAs, including across SAAs. Additionally, building greater cohesion will provide for clearer roles for intermediaries, employers, labor organizations, education partners, investments, and other stakeholders in the Registered Apprenticeship system to build and promote the Registered Apprenticeship model. This greater cohesion would enable growth in the apprenticeship ecosystem without introducing new challenges or barriers to the system.

Additionally, this greater cohesion can help ensure that Federal investments are incentivizing high-quality and diverse Registered Apprenticeship programs. Greater system cohesion can ensure more investments are focused on raising the bar of training programs to meet RAs quality standards, and ensure existing RAPs are engaged in continuous improvement? Additionally, a more cohesive system will enable a greater focus on whether investments are driving greater equity or innovation. Are the investments improving quality outcomes? Are investments distributed fairly, effectively, and efficiently, and that benefits accrue as intended?

Interim Report Appendix I.b.6: Emerging Technologies

Because new technologies continue to develop, the Apprenticeship Modernization Subcommittee discussed ways to leverage emerging technologies to enhance apprenticeship and workplace learning programs and opportunities, including assessing whether there are any challenges with employer/sponsor uptake or incorporation of emerging technologies? Examples of potentially useful emerging technologies include:

- Technologies to improve management of the apprenticeship ecosystem
- Technologies to afford more opportunities for remote learning
- Technologies to proliferate opportunities to enhance jobskill training and education

The Subcommittee discussed ways to update and enhance Federal guidance and standards to reflect emerging technologies, including leveraging emerging technologies to enhance apprenticeship and workplace learning, improving management of the apprenticeship ecosystem, increasing electronic tools to support apprenticeship (e.g., Standards Builder, Partner Finder, Occupations), and assisting apprenticeship sponsors in identifying opportunities for remote learning/steps toward program completion in a virtual setting (at a time when virtual meeting platforms and tools for virtual learning are increasing due to the pandemic).

In addition, the Subcommittee believes that emerging technologies could be used to both communicate and achieve goals related to DEIA in apprenticeship programs. This need has been communicated by industry leaders to OA and that feedback has been shared with the Subcommittee.

Creating a virtual/on-demand DEIA-focused training for mentors across sectors, potentially via funding to a Center of Excellence on Apprenticeship, could go a long way. First, it has the potential to increase scalability, particularly as USDOL-funded Industry Intermediaries invested time and resources to conduct 59 separate diversity and inclusion training sessions from September 2020 through April 2021. Second, employers typically lack the in-house capacity to deliver this training. According to a McKinsey report, though more than 80 percent of businesses face critical skill gaps, a manager's ability to meet individual employees' needs is strained as remote work increases and teams become more diverse and geographically distributed.¹⁴ This places further burden on mentors to support apprentices.

¹⁴ See <https://www.mckinsey.com/business-functions/people-and-organizational-performance/our-insights/reviving-the-art-of-apprenticeship-to-unlock-continuous-skill-development>.

Interim Report Appendix I.b.7: Messaging and Outreach Around Apprenticeship

In addition to technologies, data, standards on apprenticeship quality and apprenticeability, funding opportunities, and cohesion amongst apprenticeship stakeholders in the apprenticeship ecosystem, the Modernization Subcommittee identified a need to update and modernize messaging and outreach around apprenticeship. This includes updating terminology (including terms like “indentured apprentices”) and terms of art related to apprenticeship in both outreach efforts and USDOL’s regulations governing apprenticeship. It also requires understanding how apprenticeship is perceived in the job market more broadly, but especially among populations historically underserved by apprenticeship. If OA seeks to improve its engagement with underserved populations and promote apprenticeship as a viable and attractive career option, it must review and update messaging and outreach efforts (originating from the Federal Government, State governments, apprenticeship sponsors, educators and school counselors) in order to modernize apprenticeship and successfully reach and engage with the populations and sectors it seeks to target for increased apprenticeship participation.

Background and Opportunities

The Apprenticeship Modernization Subcommittee considered several challenges related to messaging and outreach around apprenticeship, as well as opportunities to pursue through updated and modernized messaging and outreach. Is there a need to update language used to describe apprenticeships and related terminology, considering populations and industries that may be targeted in apprenticeship expansion? Is apprenticeship seen as a viable career pathway generally? Are there challenges in convincing people and programs that connect students, pre-apprentices, or other job seekers with career opportunities that apprenticeship is a viable and valuable career option? Does apprenticeship (and USDOL/OA’s related tools, such as the Apprenticeship Partner Finder, Career One-Stop, etc.) show up when job seekers search for career opportunities?

The Subcommittee believes that improved and updated messaging will help to clarify that apprenticeship, and career paths that utilize apprenticeship participants, is a viable and attractive career pathway that leads to jobs with family-sustaining wages.

Interim Report Appendix I.c: Industry Engagement in New and Emerging Sectors Issue Papers

Interim Report Appendix I.c.1: Branding and Perception

Issue and Background:

Challenge Statement

How can USDOL/the ACA improve customer awareness and perception of Registered Apprenticeship?

Opportunities

1. Union and nonunion stakeholders work together and present a unified message
2. USDOL maintains the identity and differentiation of Registered Apprenticeship from other work-based training
3. Unlocks the power of being closer to the customer (the employer/apprentice)
4. Apprenticeship can be successfully used in more occupations than the traditional trades, including union and nonunion jobs and newer occupations

Recommendations and Best Practices:

Best Practices

1. Educators should not speak of apprenticeship as less than a college option for students; Registered Apprenticeship should be seen as a viable option on the pathway to becoming a successful middle-class American. Branding and marketing at 4-year institutions, 2-year institutions, and training providers generally should address misconceptions about apprenticeships as only limited to skilled trades
2. Plans are employer-centric in sectors, solutions are designed for the employer's requirements
3. Industry and trade-association engagement
4. Break out assets and resources by audience
5. Branding, perception, and marketing materials and outreach plans should include recognition of and strategies supporting a wide range of diverse applicants and address specific concerns of underserved communities
6. Look to other countries, such as Canada, Germany, and Switzerland, to show how apprenticeships can work for a large part of the workforce

Overall Recommendations

1. There must be an engagement of all stakeholders and customers to acknowledge their current biases and perceptions prior to creating any new branding or awareness campaigns.
2. Partner with industry and trade associations to get more engagement from industry.

3. State resources: create an asset map of what States have for branding and perception.
4. Stories: more stories should be shared, in case-studies, using video
5. Data on apprenticeship outcomes also should be emphasized in messaging, especially in supporting the importance of DEIA policies
6. USDOL should leverage momentum from NAW and provide apprentice messaging year-round. Messaging should be directed to a national audience through a national campaign.

Recommendations for Policy Changes

1. Grants and funding should have restrictions removed that preclude funding for public awareness/branding. In particular, ERISA regulations should be examined to relax restrictions on expenditures for public awareness.
2. Intermediaries need to be closer to their customers. Trade associations are a good example of this. Supporting intermediaries who are closer to the customer (employers and apprentices) provides an opportunity for the key stakeholders to have a trusted partner and voice when engaging in Registered Apprenticeship.

Recommendations for USDOL Investment

The Apprenticeship USA logo should be utilized instead of the Discover Apprenticeship logo. There should be a concerted effort by USDOL to stick with one brand in order to create brand recognition by all customers and stakeholders.

Recommendations for Innovation

1. USDOL should rely more on *Apprenticeship.gov* and Apprenticeship USA rather than "Discover Apprenticeship" because of the proliferation of apprenticeship brands, especially across States and localities.
2. The program logo and name should not change with administrations. It confuses the market.
3. OA should be used more as a brand rather than USDOL in order to minimize employer caution around USDOL.
4. *Apprenticeship.gov* should be better mapped to the customer journey. Old forms should be updated to reflect modern customers; forms and terminology on the workforce side should be re-evaluated to use employer language. Forms also should be fillable PDFs, and possibly prefilled.
5. Coordination between grantees and investments: grantees should convene for feedback, perhaps in a Stakeholder Workshop or focus group.
6. Outcomes of this coordination or stakeholder workshop should be shared among grantees.
7. There should be a ramp-up between year zero, year one and year two goals to recognize the importance of branding and perception challenges faced by new apprenticeship programs.

Other Recommendations

1. Changes pursuant to ACA and timelines for those changes should be articulated, shared, and communicated. Utilize the organizations that are a part of the ACA to share any changes or new opportunities made by OA in order to reach all of the key stakeholders the ACA members represent.
2. USDOL should work with other agencies; more connectivity should be demonstrated, but the roles of each agency should remain clear and distinct.
3. Messaging from the administration should be careful to favor neither union nor nonunion apprenticeships; buy-in and conversation from the administration is still important.
4. Draft clear definitions of national apprenticeship and youth apprenticeship; incentivize alignment between youth apprenticeship and national apprenticeship.
5. Develop stronger regional USDOL networks to leverage State asset maps for more industry collaboration and integration of RAs.
6. Define and communicate how stakeholders will benefit from registering an apprenticeship.

Interim Report Appendix I.c.2: Incentives

Issue and Background:

Challenge Statement

Well-designed incentives can be highly effective to support wider adoption of Registered Apprenticeship. However, the current system of incentives—administered through Federal grants as well as directly through the public workforce system—is not directly tied to performance outcomes or sufficiently coordinated or robust to move the needle for new and emerging industry sectors.

Opportunity

Properly targeted incentives, designed with and on behalf of employers, labor unions, joint labor-management training programs, and other training partners, can overcome inertia and spur wider adoption of Registered Apprenticeship.

Recommendations and Best Practices:

Best Practices

1. OA's Industry Intermediary Contracts has demonstrated the efficacy of incentive contracts to help new registered apprenticeship sponsors
2. Employer reimbursements need to be short-term and include accountability and employer commitments along with clear plans for longer-term sustainability beyond the span of incentive availability.
3. American Council on Education recommendations, Registered Apprenticeship College Consortium participation, Council on Occupational Education, or other similar paths for community college credits based on apprenticeship completion (example: telecommunications tower technician apprenticeship)

Overall Recommendations

The apprenticeship system should structure relevant and accessible incentives that meet the needs of small and medium-sized employers along with larger, national-scale organizations.

Recommendations for Policy Changes

1. Tax credits for wage and training expenses for apprentices in RAPs can be highly effective to support the growth of Registered Apprenticeship in nontraditional industries.
2. Partial wage support to Registered Apprentices, with appropriate guardrails to ensure that supports are short-term solutions toward starting up self-sustaining apprenticeships and tied to completion metrics, can be effectively employed. These incentives should be targeted and focused on start-up support, especially for small- and medium-sized employers.

3. Stable, multi-year incentive contracts through dedicated funding would better align with sponsors' and Industry Intermediaries' planning and training cycles. They can include increased expectations year over year as programs ramp up. A consistent, formula-based funding stream also would be valuable to SAAs.
4. Model language can help standardize State and local incentives. This could include quality standards (such as national standards and expected outcomes).
5. Agencies should consider nonmonetary supports, such as public recognition, support for outreach, and recruitment assistance. A consistently branded program marketed by several agencies to promote Registered Apprenticeship recognition should be considered.
6. Providing academic credit for apprenticeship training or tuition reimbursement can be effective incentives for apprentices.
7. America's Job Centers can be better integrated into Registered Apprenticeship programs. Training for staff and designating apprenticeship representatives at America's Job Centers and in workforce development boards would support adoption of Registered Apprenticeship and effective use of incentives.

Recommendations for USDOL Investment

1. USDOL should continue expansion of Industry Intermediary Contracts targeting new and emerging sectors.
2. Contracts to be awarded must have clear, measurable performance outcomes and required, demonstrated expertise and capacity by the intermediary to carry out the contract. Preference should be given to intermediaries that have a proven track record.
3. Categorical funding (targeting size of organization, industry sector, geography) can capitalize on specific expertise. Funding caps should be included to ensure that small- and medium-sized organizations have access to funds.
4. There should be increased WIOA/ETP funding dedicated to Registered Apprenticeship, while also streamlining the process.

Recommendations for Innovation

1. Valuable resources to promote Registered Apprenticeship include
 - a) A universal tool to support apprenticeship management and tracking (an app to log hours or competencies) and
 - b) A directory of incentives (by ZIP code)

Interim Report Appendix I.c.3: Standards and System Building

Issue and Background:

Challenge Statement

The United States needs a clear and integrated workforce development, career pipeline, and career ladders system. The existing system is fragmented and inefficient for the current workforce, job seekers, and employers. Without an integrated and comprehensive sector-based system, employers, job seekers, and young people planning their future careers—as well as pipeline entities such as intermediaries, pre-apprenticeship providers, high schools, workforce development programs, labor-management training providers and post-secondary educational institutions—cannot obtain a clear understanding of what opportunities exist and how best to develop, implement, manage, evaluate and expand registered apprenticeship.

Key challenges of the current system include:

1. Lack of standardized criteria at the national level for defining specific occupations within sectors and for designating new occupations. Of importance is the need to define what an occupation is and how it differs from a job (the occupation is broader and has a career path associated with it). This is key to avoid designating a job that is part of an existing occupation as a new occupation, as this designation directly impacts apprenticeship program approval, career choices, workforce training standards and career path mapping.
2. The definition for apprenticeable occupations currently comes from several agencies and voices that often issue inconsistent determinations and guidance.
3. Lack of standardized criteria for the review and approval of new apprenticeship programs across all approval agencies within States, including licensure boards, especially with respect to defining and approving competency-based, hybrid, and time-based apprenticeship programs (including the lack of a clear development process for competency-based standards).
4. Lack of consistency in verified, high-quality, sector-based occupational skills standards for workers, job seekers, employers and training agencies (e.g., Occupational Skill Standards that meet American Psychological Association (APA) development criteria of validity and reliability, and other appropriate recognized credentials and national organizations for each industry).
5. Lack of clearly defined pathways into careers that ensure family-sustaining wages and benefits.
6. Lack of a national system and criteria for the qualification, approval, evaluation and support of Intermediaries that ensures access to consistent, high-quality sustainable service to new and prospective sponsors in each sector.
7. Lack of comprehensive workable processes designed to promote and support development of industry-wide standards in new sectors (e.g., care economy). These processes need to

recognize unique structure and needs of differing sectors while ensuring the establishment of high-quality apprenticeships and standards within each one.

8. The need to leverage modern technology to facilitate data collection and sharing to provide real time apprenticeship information that covers the full range of topics listed above.

Opportunities

Clear industry standards for training provide multiple opportunities:

1. Industry standards provide employers, their workers, and job seekers with a clear understanding of the skills and knowledge needed to master a job and advance up a career ladder. This creates clarity, minimizes ambiguity, and supports career pathways that provide access to family-sustaining wages and benefits.
2. USDOL approved industry standards can be used by apprenticeship sponsors as a tool to communicate and connect their training with high schools, community colleges, Labor-Management training funds, workforce development agencies, and other training partners. These standards provide the foundation from which learning objectives can be created and curriculum can be developed, and they serve as the basis for the broad acceptance of sector-based, industry-recognized, credentials.
3. Common standards across an industry minimizes the duplication of standard-building efforts and can save time and resources for sponsors looking to register new apprenticeship programs. It also supports workers and employers by setting realistic skills expectations at each apprenticeship milestone and upon reaching journeyworker status.
4. Structured apprenticeships built around accepted industry standards are effective because appropriate subject matter experts from labor and management participate equally in the development process. This provides a comprehensive knowledge base and stakeholder support for the standards and results in standards that meet industry, employer, and worker needs.
5. Once clear standards exist in an industry, strong pre-apprenticeship programs can be established to introduce and prepare young people and other potential workers for careers in a particular industry or group of related industries.
6. Diversity, equity, and inclusion issues can be addressed through industry-wide standards that support and enhance the quality of pre-apprenticeship and apprenticeship programs. Clear standards integrating diversity, inclusion, and equity can also help new apprenticeship programs to support the involvement and gain approval of broad-based stakeholder groups.

Recommendations and Best Practices:

Best Practices

1. Development of industry-accepted training standards in transit has enjoyed national recognition and status because it was done on a joint labor-management basis, with the International Transportation Learning Center coordinating consortia of subject matter experts for transit frontline occupations, and then working in conjunction with the American

Public Transportation Association (APTA), the industry's trade association that also serves as a standards-setting organization. The occupational standards created through this process have been used as the basis for establishing registered apprenticeships.

2. Construction Trades Occupational Skills Standards have been developed jointly with participation from labor and employers, with broad geographical, experience, gender, and ethnic diversity representation among others. These standards serve as the basis for registering apprenticeship programs and designing and implementing apprenticeship related training and credentialing.
3. The National Tooling and Machining Association, the International Association of Machinists, and other stakeholders built an impressive framework of very detailed skills needed for machining and metal working through the [National Institute for Metal Working Skills](#).
4. The Building Trades Multi-Craft Core Curriculum (MC3) is a widely used and broadly accepted pre-apprenticeship curriculum, based on industry standards across the various building trades. Pre-apprenticeship programs such as these can be and have been delivered in partnership with a variety of educational and workforce development entities and target underserved and underrepresented communities.
5. Several international models and resources exist that should be considered to help develop a U.S. standards-based system of Registered Apprenticeship. These include Canada's Red Seal program as well as the Australian, German, Swiss, British, and New Zealand models. The intent is not to replicate these but to learn from them and create a standards-based system that reflects the United States' unique context.

Overall Recommendations

1. Standards and related apprenticeships should be used as the basis for high-quality job training programs that provide guardrails for workers seeking to gain the skills and professional experience needed to be successful. In industries that provide high-quality jobs but face economic constraints to providing good wages and benefits (e.g., early care and education, in-home caregivers), USDOL should prioritize and invest resources in promoting Registered Apprenticeship standards and related apprenticeships that are aimed at closing such social and economic gaps.
2. Standards and related apprenticeships need to be linked to industry, labor, and community needs; tie approval of future apprenticeship frameworks to high-quality, industry-accepted standards of training, with key stakeholder input. To be valid and accepted, standards and apprenticeships need to be developed according to recognized best practices and fully incorporate frontline workers and labor voice.
3. Revisit a National Skills Standards Board approach and adopt an occupational skills classification system similar to Canada, UK, Germany, Switzerland, etc. Revise the requirements associated with Appendix A (Work Process Schedule and Related Instruction Outline) in line with occupational standards.
4. These approved standards could be the basis for a template that program applicants can pull from to facilitate program approval. Furthermore, these templates not only need to be

built, but also developed and updated over time with direct stakeholder engagement (workers, labor, and employers representing different geographic areas, levels of expertise, and business sizes).

5. There should be one standard Registered Apprenticeship template for each occupation that is recognized by both SAA and OA.
6. Occupational training standards developed should be the foundation for training sponsors' curriculum and OJL and defined along with the competencies used in competency-based standards. This helps define the competencies necessary for trainers (trainer standards) and what resources employers need for successful OJL.
7. Where apprenticeable occupations are already defined (see below, at 14), examine approved registered programs for these occupations to revalidate standards, with input from relevant parties.
8. USDOL and its Apprenticeship Office should continue to lead on how occupations are designated and apprenticeships are organized and approved. USDOL also should reach across agency lines to make sure apprenticeship and training aligns with funding streams and other relevant policies.
9. USDOL should foster cross-agency collaboration to address regulatory barriers in specific industries. USDOL should consider reconciliation between Federal and State programs such as through the deregulation of California by 29 CFR part 29.
10. USDOL should be the centralized authority and repository for what are and can be apprenticeable occupations, and for making determinations on this question based on established criteria. Interagency coordination could be provided but based on USDOL's framework.
11. Formula funds should be available for established intermediaries that meet pre-established performance criteria; reapplication for grants should not be necessary for these proven programs.
12. Apprenticeships and pre-apprenticeships should connect to the public education, workforce development, and Labor-Management training systems to enhance service and opportunity.
13. Systems should be built to allow Federal and State agencies to better align approval and management of apprenticeships with regard to emerging sectors.

Related Topics and Issues

14. Training standard development can be accomplished with less up-front USDOL investment by reviewing and approving existing high-quality occupational standards for currently approved registered apprenticeship programs and by incentivizing employers through their participation in developing training standards in new and emerging sectors.
15. Labor/USDOL can help communicate to emerging sectors and industries how Registered Apprenticeship can be beneficial to them.
16. Improving common understanding of Registered Apprenticeship among participants and apprentices also would be beneficial.

17. Access to apprenticeship can be improved by removing entry barriers (e.g., eliminating a bootcamp as an entry requirement for a technology apprenticeship). Recommend setting a general expectation that only a high school diploma be required for entry into apprenticeship.
18. Incumbent workers as apprentices; communicating to employers that apprentices need not be new hires could facilitate Registered Apprenticeship engagement.

Recommendations for Policy Changes

1. Look at the alignment between the Department of Labor and other agencies, as well as opportunities for productive collaboration. Examples include:
 - In childcare, for instance, close coordination with the Department of Health and Human Services and the Department of Education can accelerate a process of bringing together all needed stakeholders for clearly articulated national standards for training.
 - A similar process can inform the growing green job sector connected to the Department of Energy; new Federal investments in improved water quality involves the Environmental Protection Agency (EPA). USDOL can work to help shape EPA's approach to apprenticeship and good jobs. Every Federal entity is involved in regulating or funding jobs. Apprenticeship development needs to reach across silos, and USDOL can take the lead in helping to do that by educating stakeholders about existing programs and by providing guidance on establishing apprenticeship processes and standards in new and emerging sectors.
2. Procurement provides another avenue for encouraging the development of apprenticeship standards and processes.
 - Federal agencies buy goods and services, and State and local governments often base their procurement policies on Federal models. Use procurement to promote good jobs with strong apprenticeship systems based on recognized industry standards. DOT has adopted the U.S. Employment Plan, which explicitly builds in job quality as a factor in evaluating proposals.
 - The U.S. Employment Plan also rewards bidders who show a strong commitment to outreach, recruitment, hiring and training of historically underrepresented populations. Interagency agreements to model the U.S. Employment Plan could improve diversity, equity and inclusion in good, family-supporting jobs.

Recommendations for USDOL Investment

1. Funding for apprenticeship infrastructure, such as agency staffing, needed to support Registered Apprenticeship expansion should be provided in Registered Apprenticeship funding plans according to an established formula.

Recommendations for Innovation

1. For USDOL Standards Builder, there should be real time support or at a minimum, chat bots that can support organizations complete the process more seamlessly.
2. USDOL facilitated industry associations should establish the criteria for all Registered Apprenticeship Standards Agreements. Where necessary, Subcommittees should be developed to address issues specific to sectors, regions (State or metropolitan), union requirements, and occupational nuances.

Interim Report Appendix I.c.4: Sector-Specific Differences

Issue and Background:

Challenge Statement

Given the wide and diverse range of New and Emerging Sectors and the distinguishing and unique characteristics among them, how can the Registered Apprenticeship system accommodate their differences without compromising the rigor and quality of the existing system?

Opportunities

- 1) INCLUSION - A Registered Apprenticeship system that would be more responsive and inclusive of currently underrepresented sectors and underrepresented workers.
 - a) Opening Registered Apprenticeship opportunities to sectors and workforces that have traditionally experienced low participation in registered apprenticeship, been overlooked, or disqualified from participating in registered apprenticeship (e.g., women, people of color, immigrants, low-income workers).
 - b) Creating systems and RAPs to address the unique needs, strengths, and challenges facing small- and mid-sized businesses, including small business owners.
 - c) Increasing the use of Registered Apprenticeship as a training modality from a worker-facing perspective as a superior approach to supporting career mobility.
- 2) CARE ECONOMY - The “care economy” would be widely integrated into the Registered Apprenticeship system, opening apprenticeship opportunities to large numbers of women, people of color, first generation college students, nonnative English speakers, essential service providers, etc. At the same time, these Registered Apprenticeship opportunities should be structured in a manner that promotes high-quality standards and pathways, while incorporating worker voice.
- 3) TECHNOLOGY - Registered Apprenticeship system would integrate and expand “technology” as an emerging industry, AND integrate and articulate technology skills *across* industries that are appropriate, common, and essential for all 21st century workers.
- 4) REGISTERED APPRENTICESHIP SYSTEM STANDARDIZATION
 - a) Establish baseline required standards around competencies, technology requirements, eligibility requirements, skills, knowledge, etc., across all existing and emerging sectors.
 - b) Standards should be from a national perspective where appropriate, and from a State, local, or industry-specific perspective where appropriate.
 - c) An improved system allows for responsiveness, adaptation, and individualization for industry-specific requirements, as needed, while maintaining high-quality standards.

Recommendations and Best Practices:

Best Practices

- 1) INCLUSION - Partnership on Inclusive Apprenticeship, re-entry apprenticeships (in and outside of incarceration), taking lessons on program design from Universal Design for Learning (UDL) approach, public sector (all government jobs - local, State, Federal, etc.) apprenticeships, RAPs that include post-secondary education within the RTI.
- 2) CARE ECONOMY
 - a) Plans are underway to conduct a national evaluation of well-established ECE apprenticeships across the country, coordinated through ECEPTS and conducted by the Center for the Study of Child Care Employment at UC-Berkeley. One goal is to identify best practices across the sector.
 - b) In healthcare, there have been successful initiatives to support intermediaries working at the national and regional levels. Support for reputable intermediaries with demonstrated track records of success should be expanded.
- 3) TECHNOLOGY
 - a) There are several instances of intermediaries doing technology-enabled Registered Apprenticeship right (that being stated, there are inconsistencies with the guidance they provide as well as a lack of overall bandwidth within the technically inclined intermediary landscape). Including technology in Registered Apprenticeship supports DEIA, modernization, apprenticeship pathway and new and emerging sectors Registered Apprenticeship development.
 - b) There are several examples of organizations like CTN or offices of digital equity that stand up programs that increase our community members' digital literacy. These skills should be integrated into Registered Apprenticeship pathways, because we cannot foresee which occupations will arise in the future, but we know that, increasingly, those new occupations will require digital capacity.
- 4) REGISTERED APPRENTICESHIP SYSTEM STANDARDIZATION – Best practices in Registered Apprenticeship system standardization include a broad education campaign for OA staff, SAA staff, and intermediaries (i.e., across the entire workforce landscape, including workforce development, apprenticeship, USDOL, etc.) toward ensuring that policies are understood, information is universally accessed and embedded, knowledge on sector specific nuance is deepened, guidelines on working in represented sectors are clearly understood and adhered to, and consistency is applied across the board in terms of implementing policy, processes, and programs. All program improvements are aimed at making the Registered Apprenticeship system more responsive to industry and worker needs.

Overall Recommendations

- 1) INCLUSION -

- a) USDOL needs to establish equitable, universal, nonexclusionary eligibility standards that can be balanced with sector-specific employment requirements unique to nontraditional and emerging sectors.
- b) USDOL should establish policies and eligibility criteria related to Registered Apprenticeship standards, apprenticeable occupations, and allocation of Registered Apprenticeship resources to ensure full inclusion and equal stature to sectors focused on workers traditionally underrepresented in Registered Apprenticeship (e.g., women, people of color, low-wage workers, care economy workers).

2) CARE ECONOMY

- a) We need a national intermediary - with deep expertise in the ECE sector, apprenticeship, industry needs, etc. - along with sustainable funding to build and expand the ECE apprenticeship efforts already underway across the country. In healthcare, there have been successful initiatives to support intermediaries working at the national and regional levels – this support should be expanded.
- b) ECE must be prioritized as an essential industry and not penalized for the “wage issue” – the fact that ECE is not publicly funded (in contrast to the K-12 system) and therefore relies on private dollars and unsustainable State or Federal programs. Instead, the Registered Apprenticeship system needs to be part of the solution to that issue and lead the way for necessary system change and policy reform (e.g., compensation parity with K-12 teachers).
- c) In healthcare, a sustained effort aimed at decreasing regulatory barriers and addressing degree inflation for a variety of higher wage occupations is required (e.g., AB 1273 in California and HB 4106 in Oregon). This would facilitate career mobility options targeted at addressing occupational segregation, providing family sustaining wages through career pathways for incumbent workers or direct entry into the sector.

3) TECHNOLOGY

- a) USDOL should focus on developing 21st century apprenticeship infrastructure that addresses the need for technology and technology skills across all sectors.
- b) USDOL, with the assistance of SAAs, needs to consider coordinating with national partnerships that focus on Registered Apprenticeship development and expansion. Those associations would include consortia of technology or technology-enabled companies (similar to CTA) that develop the frameworks for technology-enabled emerging industry apprenticeships. The association(s) would cover sector-wide and sector specific labor-market information as it relates to Registered Apprenticeship expansion in the new and emerging sectors they specialize in. Because intermediaries are too focused and dependent on Registered Apprenticeship participant numbers and project end dates, due to grant/funding constraints, there is a lack of consistent quality and availability of sector-wide guidance for the development of technology-enabled RAs at scale.

- c) We need to increase investments for technical support, industry associations and intermediaries that focus on Registered Apprenticeship expansion in new and emerging sectors. Within those groups should be subgroups that focus on unique sector-specific differences.

4) REGISTERED APPRENTICESHIP SYSTEM STANDARDIZATION

- a) USDOL, in concert with SAAs, needs to consider the development of national industry partnerships that focus on Registered Apprenticeship development and expansion (see 3a. above).
- b) Upon the development of new, sector-specific guidance (including policies pertaining to DEIA), USDOL should retool and educate all Registered Apprenticeship stakeholders on the new approach (OA vs SAA, etc.). This is about providing education and training through the Registered Apprenticeship system, as well as the establishment of uniform standards and education of those who would use these standards.
- c) USDOL needs to revise the framework for what constitutes a RA, vetting existing RAs as part of the exercise.
 - i) USDOL shall review national RAPs and consider fostering alignment where possible. For example, the State of California has various authorities on RA, various measures of guidance and two separate systems for companies and apprentices to register with. The lack of coordination or consistent guidance for Registered Apprenticeship development is a disincentive for companies to participate in RA, and USDOL should seek to address this issue.
 - ii) USDOL should invest in upgrading existing infrastructure, which will allow for more responsiveness and agility when addressing the barriers and needs of nontraditional, emerging sectors in Registered Apprenticeship expansion.
- d) The public sector employs a large segment of our country and via EEO rules, union protections, equal pay/wage scales, etc., there are many advantageous elements of a career in the public sector. However, this sector also has the following challenges:
 - i) An aging workforce
 - ii) A hard time attracting diversity for living wage requisitions
 - iii) A hard time attracting younger talent
 - iv) An aging technology infrastructure
- e) USDOL should examine promoting Civil Service careers as viable pathways for USDOL workforce development program participants while preserving the advantageous protections in the Civil Service.
- f) In consideration of a national skills classification system (that will require regular maintenance), base and intermediate technology skills need to be integrated and then compared and contrasted across all RAPs.

- g) USDOL should facilitate cross-agency collaboration to address regulatory barriers and foster alignment between Federal and State programs in an effort to reduce friction and competition between Federal and State registration. In particular, USDOL should work to see that SAAs adopt State apprenticeship law that conforms with 29 CFR parts 29 and 30.

Recommendations for Policy Changes

- 1) INCLUSION - Institute a system to ensure that eligibility criteria included in Registered Apprenticeship standards are not potentially, inadvertently, or intentionally exclusionary.
- 2) CARE ECONOMY
 - a) Expand Registered Apprenticeship to accommodate Family Child Care providers who are excluded from Registered Apprenticeship because they are small business owners.
 - b) Adapt WIOA funding policies so that cohorts of workers and RAPs can be funded as a program – rather than funding individuals or funding short-term, temporary supports.
 - c) Funding needs to be made available to low-wage industries to augment wages of apprentices who cannot yet be hired because they don't have the "on ramp" training required. Small, non-profit organizations do not have the budgets to pay those wages; workers cannot afford to complete the training without being paid; and policies and attitudes within the Registered Apprenticeship and workforce systems seem to consider providing such wage support to be a sign of employers "taking advantage" of the system or not pulling their weight – reflecting a lack of understanding of the Care Economy and the associated challenges faced.
- 3) TECHNOLOGY
 - a) USDOL, in concert with SAAs, shall work with industry partnerships that focus on 21st century Registered Apprenticeship infrastructure development and expansion in new and emerging sectors.
 - i) Subgroups within the industry partnerships should include technology and technology-enabled subject matter experts from new and emerging sectors. Additionally, participation in the industry partnerships and their subgroups will require comprehensive understanding of sector specific differences as well as the nuances that exist within the Registered Apprenticeship framework across occupations, union requirements, States and regions.
- 4) REGISTERED APPRENTICESHIP SYSTEM STANDARDIZATION
 - a) USDOL shall coordinate with industry partnerships that focus on Registered Apprenticeship development and expansion (see 3a. above). Those associations shall have subgroups that require comprehensive understanding of the nuances that exist within the Registered Apprenticeship framework across different sectors as well as across occupations, union requirements, States, and regions. SAAs should be a party to this.

- b) USDOL will review existing policies related to the development and approval of Registered Apprenticeship standards, the determination of apprenticeable occupations, and the allocation of Registered Apprenticeship dedicated resources. When and where necessary, existing policies will be rewritten to ensure full inclusion and equal stature to new and emerging sectors and for workers that have been traditionally left out, overlooked, or disqualified from traditional apprenticeship sectors (e.g., women, people of color, immigrants, justice involved, people with disabilities, low-income workers). SAAs should be a party to this.
- c) USDOL should establish a Public Sector Registered Apprenticeship Consortium for R&D, addressing the need to consider public sector careers for Registered Apprenticeship opportunities. SAAs should be a party to this.
- d) The skills classification system should be reestablished in the United States.

Recommendations for USDOL Investment

1) INCLUSION

- a) Funding is needed for sector intermediaries to develop broadly representative advisory councils to guide the development of universally approved and accepted sector-specific approaches to Registered Apprenticeship standards, processes, and programs.
- b) Toward establishing widely accepted eligibility criteria, competencies, skills, and other elements of Registered Apprenticeship standards and practices for a specific sector, funding is needed for new and emerging sectors to establish sustainable intermediaries with the capacity to provide leadership and technical assistance necessary to meet current and potential demand from employers, potential workers, and other stakeholders (e.g., labor, State government, national accreditation bodies, etc.).
- c) Investments should have specific targets for inclusive Registered Apprenticeship programs, with clearly defined metrics and specific plans for increasing the # of apprentices who are women, people of color, etc.

- 2) CARE ECONOMY – see recommendations above under “Policy Changes” – those policy changes include necessary changes to USDOL Investment.

3) TECHNOLOGY

- a) USDOL shall establish annualized funds that are dedicated to R&D for new and emerging sectors in relation to Registered Apprenticeship expansion.
- b) USDOL should establish annualized funds that sustain intermediaries and industry associations, with a focus on technology and technology-enabled Registered Apprenticeship expansion.

4) REGISTERED APPRENTICESHIP SYSTEM STANDARDIZATION

- a) Develop specific requirements and guidelines for contractors/grantees/investment awardees in working in represented sectors, collaborating on addressing regulatory barriers, aligning incentive investments for more efficient/effective utilization, etc.
- b) Establish an annualized Registered Apprenticeship funding stream that: (1) is available to successful RAPs (defined by predetermined set of metrics) without need for competitive bid; and (2) invests in R&D for Public Sector Registered Apprenticeship expansion and more inclusive Registered Apprenticeship systems.
- c) Increase marketing of Registered Apprenticeship across new and emerging sectors, including development of consistent roadshows for Registered Apprenticeship development and consistent updates to USDOL Registered Apprenticeship websites/online catalogs for Registered Apprenticeship.
- d) Establish a fund for the analyses of how much it costs to prepare people for specific occupations/industries. (Example: what are the associated costs of becoming competitive for an H-1B job. These are the types of investments needed from USDOL, ED, and our employers to prepare more Americans for the future of work via Registered Apprenticeship.)

Recommendations for Innovation

- 1) Reestablishment of the national skills classification system.
- 2) Increased investment for Registered Apprenticeship subject matter expert and technical assistance teams - helps remove bottleneck on guidance required for Registered Apprenticeship expansion at scale.
- 3) Increased investment for USDOL online resources and marketing for Registered Apprenticeship.
- 4) Increased investment for R&D as it relates to inclusive Registered Apprenticeship systems.
 - a) Coordination with national industry partnerships with intention of developing inclusive RAPs and revising outdated existing programs.

Other Recommendations

- 1) ESSENTIAL FEDERAL-LEVEL PARTNERSHIPS - EARLY CARE AND EDUCATION
 - a) Administration for Children and Families
 - i) Office of Head Start
 - ii) Office of Child Care
 - b) Department of Education
- 2) ESSENTIAL FEDERAL-LEVEL PARTNERSHIPS – HEALTHCARE
 - a) Health and Human Services
 - b) Department of Education

3) ESSENTIAL FEDERAL-LEVEL PARTNERSHIPS – TECHNOLOGY

- a) Office of E-Government and Information Technology
- b) U.S. Department of Commerce
- c) Department of Education
- d) Office of Disability Employment Policy

Interim Report Appendix I.d: Apprenticeship Pathways Issue Paper

Pre-Apprenticeship

Issue and Background:

Pre-apprenticeship and Registered Apprenticeship programs have proven successful in meeting employer- and industry-driven strategies for hiring, training, and retaining employees. However, without a well-defined structure, pre-apprenticeships can lack oversight and/or policy guidance to ensure quality, safety, protection, and a career pathway for participants. Additionally, current guidance does not provide a consistent definition of pre-apprenticeship. Further, the public generally is unaware of pre-apprenticeship opportunities and their benefits. While progress has been made in changing the cultural perception of apprenticeship generally, society often still views pre-apprenticeship as “lesser than” rather than “equal to” college preparation pathways.

Recommendations and Best Practices:

Potential impacts if the problem/challenge is addressed

- Overall goal: Attainment of long-term, meaningful careers for workers through participation in pre-apprenticeship programs that act as a pipeline to RAPs.
- Benefits for employers:
 - Addresses the considerable challenges employers face by developing a talent pipeline to fill middle-skilled jobs with trained workers
 - Employers/sponsors benefit from a stronger recruiting pipeline, better prepared/higher skilled employees, greater retention—increased ROI (e.g., lower attrition rates, sustainability of the industry, less money spent on recruiting talent)
 - Diversification of the talent pool and participating industries for apprenticeship
- Benefits for individuals:
 - Pre-apprenticeship seen as a viable career exploration tool to support opportunities to explore and learn about exciting, in-demand careers
 - Enhancement of the pipeline to highly rewarding, long-term, meaningful careers
 - Highly rewarding = pay/benefits, job satisfaction, sense of self
 - Early start on a career pathway—longer careers in skilled occupations (vs. entry-level jobs without advancement potential), greater contributions to pensions, less or no student debt acquired
 - Equal dignity for apprenticeship relative to higher education
- Benefits for the Registered Apprenticeship system:
 - Increased number of individuals participating in pre-apprenticeship and on a pathway to Registered Apprenticeship
 - Individuals will be better prepared to participate in Registered Apprenticeship and succeed
- Benefits for government:

- Increased earnings lead to increased income tax revenues to fund investment in apprenticeship (sustainable funding stream)
- Benefits for everyone:
 - Achieving collaborative/collective agreement on what pre-apprenticeship looks like without creating barriers to entry
 - Integration of both didactic instruction and work-based learning (job shadowing, classroom speakers, lab experiences, etc.) as a career development strategy to life-long growth within industry
 - By closing the national skills gap (and starting at a younger age), we will rely less on outsourcing

Clear statement of Subcommittee recommendation(s) and supporting rationale (e.g., benefits that outweigh any costs, potential indirect effects of action/inaction)

- Define pre-apprenticeship to ensure programs align with quality metrics through policy guidance (build on current guidance on pre-apprenticeship: [TEN 13-12](#), “Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources”)
 - Definition of pre-apprenticeship should:
 - Identify how pre-apprenticeship fits within a career pathway model
 - Indicate how pre-apprenticeship can lead to Registered Apprenticeship (bridge)
 - Be developed in collaboration with industry and Registered Apprenticeship sponsors
 - Identify other key stakeholders and partners necessary for program success (educators, support service providers, policymakers, churches and other community organizations, workforce development boards, etc.)
 - Collect data on programs and their impact
 - Facilitate recognition for high school credit, CTE credit, college credit, and OJL credit
 - Work alongside other education—dual enrollment
 - Fit in a stackable/portable credential framework
 - Clarify that pre-apprenticeship does not have any age restrictions—however, youth can be served by pre-apprenticeship, and it can be a key strategy to support youth entry into RA
 - Identify types of support services/barrier reduction activities that go along with pre-apprenticeship
 - Work for all industries (not a one-size-fits-all approach)
 - Encompass both occupation-specific training and more general training (e.g., GED, math, English as a foreign language, transition to work)
 - In other words, inclusive of, but not limited to, occupation-specific training

- *Questions for further discussion: Is there a need to separate training for basic work readiness/employability skills from occupation-specific training? If so, how?*
- Talk about pre-apprenticeship's role as a strategy for increasing diversity, equity, and inclusion in RA
 - Attention to diversity in recruitment for pre-apprenticeship is a critical component to ensuring Registered Apprenticeship offers pathways for all workers to succeed
 - Pre-apprenticeship programs should be encouraged as a best practice to voluntarily comply with the equal employment opportunity regulations in 29 CFR part 30 that RAPs must adhere to
 - Funding for pre-apprenticeship should support recruitment of underrepresented populations
- Should pre-apprenticeship be registered?
 - Three options considered: (1) USDOL/OA registration; (2) alternate validation method (recognition); and (3) status quo (lack of a common approach to ensuring quality, safety, protection, and a career pathway for participants)
 - Preferred option: Alternate validation method (recognition) to manage quality and encourage voluntary (opt-in) compliance with standards
 - Pros:
 - Less burdensome than requiring full registration, allows flexibility for some programs to remain unregistered while others can use it as a differentiator for why someone should choose their program
 - Opportunity for local control
 - State Apprenticeship Agencies can develop frameworks/guidance to guide recognition decisions
 - Lets sponsors make some decisions about pre-apprenticeship endorsements within government-issued policy
 - Enables employer/sponsor recognition of/credit for an academic component of a pre-apprenticeship (badging) even if work-based learning is not offered alongside the academic component
 - Allows for pre-apprenticeship to encompass a broader range of programs
 - Cons:
 - Government relies on others to manage quality
 - Data held by others
 - Additional considerations:
 - Backloading: At the end of the pre-apprenticeship, if relevant guidelines have been met, then it can be registered or recognized

- Extra credit (e.g., Connecticut approach): Pre-apprentices can earn credit in two ways, namely (1) up to 200 OJL credit hours as a student in an academic program approved as a pre-apprenticeship program (does not need to be registered); and (2) additional hours above and beyond that limit as a registered apprentice (usually part-time) while enrolled in the same academic program
- *Questions for further discussion: What are additional pros and cons of adopting an alternate validation method (recognition)? Are there other viable options (beyond registration, recognition, and status quo) the Subcommittee should consider? For example, if pre-apprenticeship is employer-driven, sector by sector, company by company, would there be a lack of synthesis of best practices vs. if the government centralizes lessons learned?*

Presentation of options with pros/cons

- See above list of pros and cons associated with the question “Should pre-apprenticeship be registered?”

Identification of relevant best practices

- Known best practices:
 - [Career Connections](#) (Carpenters International Training Fund): “The Career Connections Program is a four-year program designed to help students develop knowledge, skill, and experience in carpentry. Designed for high school students, community-based programs, and pre-apprenticeship program, Career Connections graduates get a jump-start into a career within the construction trades and an opportunity for possible advanced placement in a UBC [United Brotherhood of Carpenters and Joiners of America] pre-apprenticeship or apprenticeship programs.” The Career Connections website shows the opportunities that are available using the program as a stepping stone to youth apprenticeship, pre-apprenticeship, or Registered Apprenticeship.
 - [Women in Apprenticeship and Nontraditional Occupations Grant Program](#) (USDOL Women’s Bureau): “The [WANTO] grant helps to expand pathways for women to enter and lead in all industries. . . . Organizations receiving funds will provide one or more of the following types of technical assistance: Develop pre-apprenticeship or nontraditional skills training programs to prepare women for those careers; Provide ongoing orientations for employers, unions and workers on creating a successful environment for women to succeed in those careers; and Set up support groups, facilitate networks or provide support services for women to improve their retention.”
 - [LIUNA Training partnership with YouthBuild](#) (LIUNA Training and Education Fund): “In 2014, LIUNA Training and YouthBuild USA entered into a national Memorandum of Understanding (MOU) that established both organizations’ desire and commitment to work together to build a national pre-apprenticeship

to apprenticeship pipeline for underrepresented youth. One of the main goals of the partnership was to help link local YouthBuild chapters with LIUNA apprenticeship sponsors aimed at supporting the direct entry of qualified YouthBuild graduates into LIUNA apprenticeship programs. This would provide youth in communities across the nation with access to solid middle-class construction careers."

- [CWIT's Technology Opportunities Program](#): "TOP is a Union Construction preparation pre-apprenticeship program. Our FREE 12-week, 180-hour training program will help you learn about all the different Trade options you could pursue as a career; like Carpenters, Electricians, Ironworkers, Pipefitters, Laborers, Plumbers, Painters, Sheet Metal Workers, Bricklayers, and much more! In TOP, you'll learn hands-on skills, job site safety, physical strengthening, and classroom work to prepare you to successfully take the different Union Apprenticeship aptitude entry exams. We also assist with applying to the Union Trade Apprenticeship program openings of your interest."
- Wraparound services (housing, transportation, childcare, etc.) and leveraging of existing resources to support participation in and completion of apprenticeship
- Offering strength training classes to help participants succeed in fields that involve heavy lifting
- Assistance with high-speed internet access and devices for remote instruction
- Areas to explore:
 - Canvass what State Apprenticeship Agencies, OA States, and State Workforce Boards are doing to identify best practices and connect to State Apprenticeship Directors to have conversations about it
 - Look to [YouthBuild](#), [Job Corps](#), [CTE Centers](#), and [WIOA youth programs](#) for best practices with respect to education and work-based learning, blending of support services/barrier reduction, etc.
 - Military-to-apprenticeship programs to help veterans transition into civilian careers
 - Programs to support foreign nationals/refugees joining the U.S. workforce
 - Hybrid models that combine time and competency requirements
 - Using WIOA funds for pre-apprenticeship

Recommendations for USDOL or other government investment

- Provide funding to support promotion/awareness/uptake of pre-apprenticeship
 - Connect individuals with answers to key questions: What is it, what are the benefits, and how do I get involved?
 - Long-term funding is needed to support these campaigns (marketing may require several years to bear fruit)
- If USDOL adopts regulations, what technical assistance do employers need to comply?

- What types of activities do intermediaries carry out with respect to RA—and what would translate to pre-apprenticeship?
 - Look at [Partnership to Advance Youth Apprenticeship](#) case studies for best practices/lessons learned
- Tools for counselors/teachers to support integration of pre-apprenticeship into curricula and advice/education to students about pre-apprenticeship as part of a career pathway
- Resources to connect employers, schools, students, and parents to achieve greater buy-in around pre-apprenticeship
- Build capacity to develop (and share with employers) longitudinal data/evidence on the impact of pre-apprenticeship programs on earnings and on successful hiring into and retention in RAPs.
- Retool *apprenticeship.gov* to educate the public about pre-apprenticeship and highlight pre-apprenticeship opportunities (e.g., a pre-apprenticeship selector tool that allows users to filter programs by specific attributes such as direct entry into apprenticeship, high placement rate, high completion rate, wraparound services (childcare, assistance with transportation, tools included, etc.), top 10 in-demand occupations, guaranteed placement, multiple employment opportunities, etc.)
- To align with the above-described proposed framework for recognition of high-quality pre-apprenticeship programs (as an alternative to registration), allocate some funding to programs that meet voluntary, industry-driven standards for quality (e.g., completion, placement, and retention rates), safety, diversity, etc.
- Consider whether/how planned increased investments in transportation and infrastructure can be used to support and expand pre-apprenticeship
- Support final passage of H.R. 447, the National Apprenticeship Act of 2021, in the 117th Congress to expand opportunities for and access to pre-apprenticeships, among other items
- While not specific to pre-apprenticeship, the Subcommittee also has recommendations about how to strengthen the apprenticeship ecosystem generally:
 - Raise awareness among employers that employing apprentices may qualify them for the [Work Opportunity Tax Credit](#) (designed to promote “hiring individuals from certain targeted groups who have consistently faced significant barriers to employment”)
 - Review existing research/data on how apprenticeship is funded and sustained in other countries (e.g., Germany, Switzerland, UK) and identify best practices that can be adapted to the U.S. model (e.g., “functional flexibility” approach to training)
 - Develop comparative performance data for apprenticeship and higher education using common metrics to evaluate success (e.g., completion rates)

Recommendations for innovation

- Create a “Pre-Apprenticeship Friendly Employer”/“Pre-Apprenticeship Friendly Apprenticeship” marketing program to encourage employers to hire and RAPs to recruit (with direct entry provisions) pre-apprentices
 - “Pre-Apprenticeship Friendly” status earned based on, for example, meeting certain metrics for hiring, supporting, and retaining pre-apprentices
 - Potential for multiple tiers to distinguish employers/programs with higher metrics from those that meet minimum thresholds
 - Could connect to funding by using the “Pre-Apprenticeship Friendly” status as a factor in government-funded opportunities
- Look into expanding tax credits to encourage employers to develop pre-apprenticeship programs and employ successful pre-apprentices as apprentices
- Explore methods for employers and RAPs to support pre-apprenticeship programs, such as pooled funds for employers/RAPs that invest in pre-apprenticeship training
 - Approach used in some European countries to support apprenticeship
 - Effectively a pooled savings account that employers who invest in training can draw on—“freeloaders” are not able to withdraw funds
 - In employers’ interests to pay in because it helps sustain their own industries
- Have USDOL itself recognized by Department of Education (ED) as an accreditor for purposes of higher education credit

Other relevant items the Subcommittee wants to report for ACA consideration

- Need to coordinate with ED, particularly related to pre-apprenticeship programs that include high school programs, as well as how pre-apprenticeship fits within a career pathway
 - What method would best allow for meshing with schools’ requirements?
 - How can school systems and the workforce development system better coordinate?
 - Underlying message: Apprenticeship and higher education are not in competition with each other; rather, they are essential to one another (collaboration, not competition)
- The Subcommittee does not support the use of funds to subsidize employers’ wage costs

Interim Report Appendix II: Additional DEIA Materials

[Interim Report Appendix II.a](#)

[Sample of Subcommittee's Personal Experiences Regarding Diversity, Equity, Inclusion, and Access in Registered Apprenticeship](#)

On the value and impact of apprenticeship to individuals from underserved demographic groups:

Apprenticeships are such a transformative vehicle for achieving DEIA, because they unlock opportunities to meaningful and well-paying occupations.

On average, vocational training increases high school completion rates among students at risk of dropping out by 16 percent.

"The YTTW Pre-Apprenticeship Program helped me grow in so many ways, especially professionally. . . it changed my life because it gave me the chance to become a responsible woman and learn how to be a healthcare worker at an early age. YTTW is not just a program, it is a family and I believe it has not only changed my life but the lives of many other students who have an interest in healthcare as a career." – *an alumna of a program run by an ACA member*

"The YTTW Pre-Apprenticeship Program has changed my life in a magnitude of ways. The most important aspect of the pre-apprenticeship program is that it provided me with a job in the healthcare field which leads to a career path. Most high school graduates interested in the medical field do not have a professional job in the healthcare field before they graduate college. The apprenticeship program enabled me to enter the healthcare field as a recent high school graduate working as a Certified Nursing Assistant. I have been able to work with patients while learning aspects of the nursing field which I intend to pursue. Through my job, I am learning what I like and dislike about the healthcare field, in turn allowing me to narrow down what career I want to pursue. I am more than thankful for the opportunities I have received through the apprenticeship program and for the enlightenment I have gained from it." – *an alumna of a program run by an ACA member*

"The emergency room is the ideal classroom. In just 1 year I have seen multiple cardiac arrest cases, emergency pregnancies, and multiple other medical cases. This would never have been possible without my admission to the YTTW Pre-Apprenticeship Program." – *an alumna of a program run by an ACA member*

"Without the YTTW Pre-Apprenticeship Program, I would not be currently working on my career. I would be working a regular job, like most of my peers. They placed me alongside professional healthcare workers who lead and inspire me on a daily. The early exposure to healthcare will stick with me my entire life." – *an alumna of a program run by an ACA member*

"The YTTW program gave me that vital job placement out of high school that has made all the difference. I recently completed my Doctorate to become an Emergency Family Nurse Practitioner." – *an alumna of a program run by an ACA member*

"I knew I wanted to be a chiropractor at a very young age. The YTTW Pre-Apprenticeship Program presented me with the ideal opportunity right out of high school to get the important and hard-to-find direct experience I needed to start my career. The YTTW program was vital to help start my career and it allowed me to find work in physical therapy within months of graduating from high school. No other program can do that!" – *an alumna of a program run by an ACA member*

On continued occupational segregation and discrimination:

"The reality is that we in the trades are not surprised by these numbers."

"Completion rates are abysmal for African Americans and women. We need to get to the root of why this is happening."

"Let's talk about retention. When women or people of color finish their contract, how many are called back for another job? This is the reason why they do not get longevity on the job. On top of that, we get a much smaller pension because we have worked fewer hours."

"In construction and other occupations that have traditionally been dominated by white males, women and people of color must prove their skills repeatedly. It is assumed simply because of your gender or race that you do not have skill. Men are assumed to have skill and must prove otherwise."

"Some unions claim that they are open to everybody, but their numbers do not reflect that motto. They are doing very little to include people of color. We have to challenge that."

"A large number of the African Americans who are in apprenticeships programs are in prison apprenticeship programs. And those programs rarely turn out journey-level workers; when you come out of prison, you still have to try to get into a nonprison apprenticeship before you can journey out."

Stereotypes on "what it takes to be a viable candidate for a particular job," preconceived notion of who is a "fit" for a job or that a person cannot do a job based on race and ethnicity may impact hiring practices and disproportionately impact people of color. Additionally, overreliance on traditional sourcing pools and referrals limit access to underrepresented talent. Noninclusive or hostile environments, predicated upon lack of awareness, bias (unconscious or conscious), or lack of cultural intelligence, often impede the success of people of color in apprenticeship programs.

Failure to proactively seek out and cultivate relationships with nontraditional sources may limit access to underrepresented talent pools (e.g., faith-based organizations).

As it relates to minorities in underserved communities, they may lack exposure to certain career paths. They often have no exposure to apprenticeships and do not understand their value. There is sometimes a sense that their race, ethnicity, or both dictate their job choices. Additionally, family and support system bias against apprenticeship programs, preventing potential applicants from pursuing programs and limiting community support of apprenticeship programs. All of which contributes to lack of awareness, unwillingness to pursue apprenticeships, or the insufficient support necessary to succeed once enrolled in a RAP. Any solution designed to increase representation also must address these barriers.

On discrimination – and talking about discrimination:

"I think it is critical that we address discrimination. If we do not address this problem, then this is a waste of time. We know that these numbers show labor-market discrimination."

"People dance around the subject because the topic is uncomfortable. But women and people of color know that we have been discriminated against in one shape or form, but white men do not understand that because they do not experience it in their lives."

"These numbers of apprentices in the skilled vs. nonskilled trades show the difference between the races. It is discrimination and racism that are the cause. But we are afraid of talking about it because we might get fired."

On the overall process for implementing DEIA in registered apprenticeship:

"Compliance review? What's that? I've never heard of that, or had one, to my knowledge." – *a member of the ACA who runs RAPs in a nontraditional apprenticeship industry*

On the barriers to industry demand:

"The [State tax credit] plan was arduous. By the time I had the information [the State] requested, the apprentices only had a few months left in their program and we were going to have to report their hours every week along with documentation in order to get ~\$500 a week per apprentice. Traditional grants are also difficult to navigate."

[Interim Report Appendix II.b](#)
[Definitions of Key DEIA Terms](#)

What does DEIA Mean?

Term	Definition
Diversity	the practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities
Equity	the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment
Inclusion	the recognition, appreciation, and use of the talents and skills of employees of all backgrounds
Accessibility	the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them

How are underserved communities defined?

The President's E.O. on "Diversity, Equity, Inclusion, and Accessibility in the Federal Workforce," E.O. 14035 (June 25, 2021), defines the term "underserved communities" as –

- (a) populations sharing a particular characteristic, as well as geographic communities, who have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life

and goes on to say that –

In the context of the Federal workforce, this term includes individuals who belong to communities of color, such as Black and African American, Hispanic and Latino, Native American, Alaska Native and Indigenous, Asian American, Native Hawaiian and Pacific Islander, Middle Eastern, and North African persons. It also includes individuals who belong to communities that face discrimination based on sex, sexual orientation, and gender identity (including lesbian, gay, bisexual, transgender, queer, gender nonconforming, and nonbinary (LGBTQ+) persons); persons who face discrimination based on pregnancy or pregnancy-related conditions; parents; and caregivers. It also includes individuals who belong to communities that face discrimination based on their religion or disability; first-generation professionals or first-generation college students; individuals with limited English proficiency; immigrants; individuals who belong to communities that may face employment barriers based on older age or former incarceration; persons who live in rural areas; veterans and military spouses; and persons otherwise adversely affected by persistent poverty, discrimination, or inequality.

Individuals may belong to more than one underserved community and face intersecting barriers.

- (b) The term “diversity” means the practice of including the many communities, identities, races, ethnicities, backgrounds, abilities, cultures, and beliefs of the American people, including underserved communities.
- (c) The term “equity” means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.
- (d) The term “inclusion” means the recognition, appreciation, and use of the talents and skills of employees of all backgrounds.
- (e) The term “accessibility” means the design, construction, development, and maintenance of facilities, information and communication technology, programs, and services so that all people, including people with disabilities, can fully and independently use them. Accessibility includes the provision of accommodations and modifications to ensure equal access to employment and participation in activities for people with disabilities, the reduction or elimination of physical and attitudinal barriers to equitable opportunities, a commitment to ensuring that people with disabilities can independently access every outward-facing and internal activity or electronic space, and the pursuit of best practices such as UDL.

How Are Underserved Communities Defined?				
Black and African American	Hispanic and Latino	Native American, Native Alaskan, and Indigenous People	Asian American, Native Hawaiian, and Pacific Islander	Middle Eastern, North African
Women	Lesbian, gay, bisexual, transgender, queer, gender nonconforming, and nonbinary (LGBTQ+)	People who face discrimination on the basis of pregnancy	Parents	Caregivers
Face discrimination because of religious beliefs	Persons with Disabilities	1st Generation Professional/College	Limited English Proficiency	Immigrants

Older Age	Formerly Incarcerated	Inhabitants of Rural Areas	Veterans and Military Spouses	Adversely affected by persistent poverty
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[Interim Report Appendix II.c](#)

[Background on Federal Procurement Requirements and How They Interact with Registered Apprenticeship](#)

Background: Under long-standing Federal law, Federal contractors and subcontractors are required to provide equal employment opportunity to all their employees (including their apprentices), and to take affirmative action to promote their equal opportunity. This means not discriminating on the bases of race, color, national origin, sex, and disability (as well as religion, sexual orientation, gender identity, veteran status, and because they have violated any employer rule requiring pay secrecy). It also means that Federal contractors have to make good-faith efforts to employ women and people of color in proportion to their representation among workers in the local area who are qualified for the occupation in question. So for example, if 40 percent of bookkeepers in the Washington, D.C., area are African American, a Federal contractor in that area would have to make good-faith efforts to meet the goal that 40 percent of its bookkeepers be African American. OFCCP, an office within USDOL, enforces these requirements. In addition, the goal for individuals with disabilities, for all occupations, is 7 percent.

Because apprenticeships are entry-level jobs, there is likely to be a wider pool of workers in their areas who are qualified to be apprentices, and those pools are likely to include a greater proportion of women and people of color than the pools of workers who are qualified for jobs that require the skills that someone already trained for an occupation will have. Thus, increased use of apprenticeship is a way that Federal contractors can bring in more diverse workforces, and be more able to meet their affirmative-action goals. For that reason, increasing the use of apprenticeship among Federal contractors can be an important way to facilitate DEIA.

However, outside of construction and perhaps some manufacturing, Federal contractors are not widely aware of apprenticeship at all, let alone as a strategy for increasing their employment of underrepresented groups and meeting their affirmative-action goals.

OA should work with OFCCP to help them educate the Federal contract community about registered apprenticeship and encourage them to use it more.

There are some special considerations applicable to Federal contractors and recipients of Federal financial assistance in the construction industry. OFCCP has predetermined goals for the employment of women and minorities in construction. For women, that goal is 6.9 percent; for people of color, the goal varies according to geographic area. These goals *have not been updated since they were first set in place in the Carter Administration*.

- The goals applicable to construction need updating to align them better with current Supreme Court precedent on affirmative action and with present-day demographics. Specifically, the 6.9-percent participation goal for women, applicable nationwide, is too low in many places and for many trades. The numeric participation goals for minorities aggregate the minority racial and ethnic groups together, masking underrepresentation of individual race or ethnic groups. The minority goals are also based on the 1970

Census. The goals also should be determined based on measures that do not lock in the current representation of a group, because current representation reflects years of discrimination, and the current good-faith standard should be strengthened.

- Processes and requirements for large infrastructure projects (“mega-projects”) should be established. These should include requiring projects to establish and provide resources for regular community input information about goals and to make information about the progress that contractors make toward their goals to be available to the public, so that community groups can monitor participation in real time. They also should include requiring Federal agencies to include contractors’ participation in mega-projects and adherence to their Affirmative Action Plans as a bid condition and in their contracts.

An even more direct way to encourage apprenticeship (and the diversity that comes with more entry-level jobs – i.e., more apprentices) would be for some or all Federal contractors to be required to use a minimum percentage of apprentices. For the construction workforce, where apprenticeship is extremely common, OA should work with OFCCP to establish apprentice utilization goals by trade. In other industries where apprenticeship is less common and not necessarily appropriate, OA should work with OFCCP and stakeholders to determine a methodology for encouraging or requiring a minimum apprentice utilization requirement.

[Interim Report Appendix II.d](#)

[Detailed Recommendations, Including Best Practices/Recommendations and Opportunities for Innovation](#)

For each of sections a, b, and c, policy; metrics; technical assistance; investment; data; best practices; opportunities for innovation; and impact on each underrepresented population will be addressed (where applicable).

I. The Subcommittee's specific recommendations

a. Overall Process for DEIA Implementation Recommendations

To effectuate the Subcommittee's recommendation of putting a high priority on improving implementation of existing DEIA requirements –

In the areas of policy and procedures:

- OA and the State Apprenticeship Agencies (SAAs) should undertake frequent program reviews or audits during which OA staff audit programs' progress and provide actionable technical assistance. For example, it could help programs be more successful at reaching/recruiting underserved demographic groups if OA and the SAAs engaged with RAPs and training centers about how they could improve their outreach and recruitment during regular reviews. Programs should be audited after first year of operation; after second year, for affirmative-action plans; and again, at least every 3 years.
- OA and SAAs should put a high priority on planning for EEO when helping RAPs develop their Standards and initially register their programs.
- OA should remove administrative barriers to make implementation of 29 CFR part 30 as easy as possible for RAPs (for example, updating the data provided in the Universal Outreach Tool and making the Demographic Analysis Tool and Affirmative Action Plan Builder more user-friendly).
- OA/SAAs should improve discrimination-complaints investigative processes.
- OA should ensure that all SAAs are aligned with 29 CFR part 30.
- OA should require stronger DEIA training for employers and mentors to cover topics such as: cultural competency; inclusivity; bias awareness; anti-discrimination law; managing difficult conversations with diverse populations (including race/ethnicity, gender identity/expression); dealing with microaggressions and unconscious biases. (29 CFR part 30 currently requires RAPs to provide some of this training, including basic information about their EEO Policy and anti-harassment training, but the training required is quite bare-bones.)
- OA should build out its policy guidance on 29 CFR part 30 better, to be more responsive to the field's implementation needs.
- To address occupational segregation in apprenticeship and ensure that underrepresented populations are not tracked into low-paying, dead-end jobs through apprenticeship, OA should amend the definition of "apprenticeable occupation" in 29

CFR part 29 to require that to be apprenticeable, an occupation must, at the journey level, provide a family-sustaining wage based on local living standards.

In the area of DEIA metrics:

- OA/SAAAs should measure and track success through Equity Indices showing the representation of new, active, and completing apprentices from each underserved demographic group in the context of local area, industry, education/skills, and wages/promotions.

In the areas of data and innovation:

- OA should make apprentice demographic data, disaggregated by race, ethnicity, and sex, and separately for each State and for each standard occupation code, public on a dashboard site.
- OA and SAAAs should use data from RAPIDS, Program Standards, and audits to prioritize program reviews, geographic areas, and industries to inform its investment decisions, determine where to deploy resources, and determine on what topics to provide staff training and technical assistance to sponsors.
- As mentioned above, OA should make existing technology tools (UOT, DAT, Apprenticeship Jobs Finder) more useable.
- OA should enhance its technology usage by using strategic social media and networks marketing to increase awareness and produce PR marketing videos strategically targeted to underserved groups (such as short media clips of companies showcasing underserved groups in their apprenticeship programs).
- OA should consider gathering new data on programs' and apprentices' needs through formal, representative surveys (not just anecdotes).
- OA should help RAPs track and monitor applications to their programs (perhaps by making available dashboard tracking-software for this purpose).
- OA should use and expand the USDOL-supported web portal of SkillsCommons (<https://www.skillscommons.org>) for apprenticeship resources: <https://www.skillscommons.org/discover?query=apprenticeship>.

In the area of investment:

- OA should use funding to incentivize representation of women, people of color (POC), and individuals with disabilities (IWDs) among apprentices in sectors where these groups are underrepresented. Incentives should not be diluted with too many priority groups; issues with particular groups should not be masked by aggregating groups.
- OA should fund grantees to actively educate RAPs (including JATCs), apprentices, higher education, and other apprenticeship stakeholders about DEIA practices (including nondiscriminatory selection processes, outreach and recruitment practices, and retention) through, for example, a series of handbooks. The goal is that among them,

OA, the SAAs, and OA's grantees and contractors will ensure that *all* registered programs are aware of DEIA requirements and best practices.

- OA should invest in regularly updating the data provided in the Universal Outreach Tool and making the Demographic Analysis Tool and Affirmative Action Plan Builder more flexible and user-friendly.

The Subcommittee suggests the following best practice for OA's DEIA implementation process:

- OA should use leverage technology to increase awareness and implementation of EEO standards – for example., by sending email reminders and updates about these rules twice a year.

b. Industry Demand Recommendations

To effectuate the Subcommittee's recommendation to increase industry demand for registered apprenticeships to achieve DEIA goals –

In the areas of policy and government partnerships:

- OA should leverage Federal procurement requirements to increase demand for apprentices from diverse populations. Working with OFCCP to strengthen contractor requirements for DEIA should increase demand for apprentices and pre-apprentices from underrepresented groups. That is because contractors are more likely to meet their DEIA goals if they use apprentices. (Appendix II.c provides background about long-standing DEIA requirements for Federal contractors and subcontractors and how they interact with apprenticeship.) Specifically –
- OA should work with OFCCP to help educate the Federal contract community about registered apprenticeship, and encourage contractors to use it more.
- OA should encourage OFCCP to update the numeric participation goals for women and people of color in construction, taking into consideration the likely impact of the increased diversity of apprentices on federally funded construction projects.
- OA should work closely with OFCCP on large infrastructure projects ("mega-projects").
- OA should work with OFCCP to establish for the construction workforce apprentice utilization goals by trade to ensure that entry-level jobs are available on federally contracted and federally assisted construction work.
- In other industries where apprenticeship is less common, OA should work with OFCCP and stakeholders to determine a methodology for encouraging or requiring a minimum apprentice utilization.

In the area of investment:

- OA has a crucial role to play in incentivizing employers to adopt apprenticeships that offer opportunities to underserved demographic groups. In particular, OA should –

- Provide and fund assistance to employers and RAPs to more easily access and braid available funding, such as WIOA funds, tax credits, funding for wraparound services.
- Fund activities to increase awareness of the existence of available funding to cover costs of apprenticeship.
- Provide incentives through grants or otherwise to employers to cover the costs of wraparound services that apprentices need to complete their programs (childcare, transportation, etc.).
- Provide incentives and recognition to employer, educational, and recruitment programs focused on Registered Apprenticeship hiring/completion.
- Incentivize high schools with funding to partner with RAPs to include goals that focus on the percentage of completers and recognition via signing days.
- Provide incentives to employers that hire and train apprentices while enrolled in targeted workforce development programs that are connected with RAPs.
- Provide incentives to sourcing pools for retention beyond initial employment through completions of the apprenticeships.
- Ensure that investments can offset costs such as American Council on Education accreditation for "OJL review" (which can cost ~\$25,000).
- Encourage other Federal and State agencies to make similar investments.
- Other recommended OA investment strategies to increase industry demand are:
 - Continuing to invest in engaging business/trade associations/unions to promote and play a role in developing registered apprenticeships as part of their DEIA strategies in both traditional and emerging industries.
 - Invest in targeted marketing to showcase how DEIA elevates Diversity, Equity and Inclusion goals as well as ESG objectives.
 - Continue support for DEIA Center of Excellence (called the National Innovation Hub for Diversity, Equity, Inclusion, and Access in Registered Apprenticeship), focusing on publicizing the availability of the technical assistance that this Innovation Hub provides to RAPs and employers.

In the areas of data and innovation:

- OA should enhance tracking, data, and analytics to document the benefits of RAPs to employers' DEIA goals, employee retention, and career progression.

The Subcommittee highlights the following best practices:

- Employers: Make the case to leverage DEIA and RAPs to meet the demand for a highly skilled workforce
- Education: Increase awareness/change perceptions at high schools, community/technical colleges, MSIs
- Local Workforce Organizations and CBOs: Expand talent pipeline in the local market

- Local Businesses/MOBs: Foster career exploration and recruitment in diverse areas
- Include employers earlier in the apprenticeship process such as recruitment and onboarding.

c. Supply-Side Barrier Recommendations

To effectuate the Subcommittee's recommendation to make it a priority to remove barriers for individuals from underrepresented communities to gain access to, to succeed in, and to complete apprenticeship programs –

In the area of policy and procedures:

- OA and SAA staff, intermediaries, and workforce-development agencies should work with RAPs and with apprentices to ensure that apprentices have their basic needs met through wraparound services: stipends for childcare, transportation, equipment, etc.
- OA and SAAs should address critical areas of concern that interfere with apprentices' entrance into and completion of their apprenticeships. These areas of concern include aptitude tests that tend to screen out applicants from certain underserved demographic groups and are not related to successful performance of an apprenticeship; harassment, discrimination, bullying, and hazing, which may be particularly prevalent in some industries; bare-bones requirements of training about basic information about RAPs' EEO policies and anti-harassment training; lack of implementation of even these training requirements; personal protective equipment that does not fit women; and discriminatory work assignments and fewer hours. The Subcommittee's recommendations for how OA/SAAs should address these concerns are contained in the section on the Overall Process for DEIA Implementation, above.)
- ETA (or Congress) should change the ETP eligibility requirements so that quality pre-apprenticeship programs that meet the definition in TEN 13-12 are eligible for ETP inclusion in the same way that RAPs are.

In the area of investments:

- USDOL and other Federal and State agencies should invest in expanded recruitment and outreach to increase awareness and overcome the stigma of apprenticeship by reaching out to underserved demographic groups to change perceptions about apprenticeships and enhance awareness of RAP benefits.
- USDOL and other Federal and State agencies should invest in quality workforce readiness and pre-apprenticeship programs. (See TEN 13-12, which establishes a framework for defining quality pre-apprenticeship programs.)
- USDOL and other Federal and State agencies should invest in wraparound services for apprentices to help them enter and complete apprenticeships.
- USDOL's and other Federal and State agencies' investments should cover training for trade associations, unions, community organizations, and businesses to provide mentorship and support to apprentices throughout their apprenticeships.

- OA should focus on high school apprenticeship as a critical DEIA strategy.
- OA should provide incentives or investments in programs that address successful completion of apprenticeship programs holistically. For example, programs that provide critical assistance and mentoring to the candidate to help navigate the application process, provide coaching to help the apprentice navigate workplace impediments to success.

In the area of innovation:

- USDOL and other Federal and State agencies should consider providing unemployed/dislocated workers incentives to go into an apprenticeship program (e.g., signing bonuses; payments of \$5+/hour on top of wages for a period of time; housing subsidies). These incentives should be focused on workers from underserved demographic groups.
- Focus on programs that allow current employees or former apprentices to participate in new apprenticeship programs as a mechanism to upskilling employees and provide a pathway to higher paying apprenticeships mitigating occupational segregation.

In the area of government partnerships:

- OA should work with OSHA to establish and enforce standards for PPE that fits; clean, sex-separate or single-user bathrooms; and workplace violence.

The Subcommittee highlights the following best practices:

- Employers/unions/RAP sponsors should enhance training and support of apprentices along the journey to ensure completion of program
- Employers/unions/RAP sponsors should create a culture of inclusion before, during, and after the apprenticeship process.
 - The Ironworkers' ["Be That One Guy" education campaign](#), spearheaded by ACA Member Vicki O'Leary, is a good example. 'Be That One Guy' is a training program that helps people learn how to defuse hostile situations and gain the confidence to be able to react when they see or experience harassment.
 - Another good example is the [Respect, Inclusion, Safety and Equity in the Construction Trades \(RISE Up\)](#) program developed by Apprenticeship and Nontraditional Employment for Women in Seattle, a respectful workplace campaign designed to shift the culture of construction to be more inclusive to a diverse workforce.
 - Create a culture and sense of inclusiveness/belonging by having diverse mentors and peer "buddies" support systems by hiring cohorts of two at minimum.
- Employers/unions/RAP sponsors should consider eliminating aptitude tests for applying apprentices, which may be a barrier for some, particularly in some industries.

- Employers/unions/RAP sponsors should train journeyworkers on how to mentor apprentices and establish mentoring programs and buddy systems for all apprentices.
- Provision of childcare for early hours for construction jobs and at night so that apprentices can attend class (related instruction) when it is at night
- Employers/unions/RAP sponsors should provide paid family and medical leave. (The Ironworkers and IUPAT are examples of unions that provide paid maternity leave.)
- Successful apprenticeships need to reflect the communities they serve. Employers/RAPs should make efforts to build rapport with the diverse communities in which they are located and to which they market—e.g., create a sense of community by getting community/local company buy-in for establishing apprenticeship programs; host open houses/field trips to learn about the job opportunities.

Interim Report Appendix II.e

Additional Notes on Specific Under-Served Demographic Groups Under Consideration

I. Race and Ethnicity

Overall Theme:

- Focus on using DEIA strategies to provide employers greater access to underrepresented talent.
- One Size Does Not Fit All: Specific strategies may be required for different demographic groups that address unique barriers to entry and success.
- Inclusive workplace practices that improve hiring, retention, career progression and work environment will benefit all employees (regardless of race and ethnicity)

How we defined Race and Ethnicity

The U.S. Census uses the definitions for race and ethnicity required by OMB.

The U.S. Office of Management and Budget (OMB) requires two minimum categories for data on ethnicity (Hispanic or Latino and Not Hispanic or Latino) and five minimum categories on race (American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander) and White. The Census Bureau is also required by Congress to use the category "Some Other Race." People may report multiple races.

The race and ethnicity categories generally reflect social definitions in the U.S. and are not an attempt to define race and ethnicity biologically, anthropologically, or genetically. We recognize that the race and ethnicity categories include racial, ethnic, and national origins and sociocultural groups.

Key Issues and Potential Barriers That Impact Underrepresented Demographic Groups

- Employers/Industry:
 - Discrimination, implicit bias, and unconscious bias in hiring and workplace practices.
 - Noninclusive or racially hostile environments that are predicated upon lack of awareness, bias or lack of cultural intelligence may have adverse impact.
 - Stereotypes on "what it takes to be a viable candidate for a particular job," preconceived notion of who is a "fit" for a job or that a person cannot do a job based on race and ethnicity may impact hiring practices.
 - Over reliance on traditional sourcing pools and referrals may limit access to underrepresented talent pools.
 - Failure to proactively seek out and cultivate relationships with nontraditional sources may limit access to underrepresented talent pools (e.g., faith-based organizations).

- Employers using a one-size-fits-all strategy may have limited success finding untapped talent across multiple demographic groups (e.g., different strategy may be required to tap into Asian talent pool vs. Black talent pool or Native American talent pool).
- Potential Applicants and Selected Apprentices
 - No exposure to certain career paths. Your race and ethnicity dictate what you will become in life. Lack of confidence or a feeling that you are not intelligent enough to do the job or don't deserve the opportunity.
 - Family and support system bias against apprenticeship programs prevent potential applicants from pursuing programs and limit community support of apprenticeship programs.
 - Burdensome application and selection process significantly reduces an applicant's chance of being accepted into an apprenticeship and succeeding once selected. Impediments include:
 - Assessments, the hiring process, and managers not adequately trained result in a disparate impact.
 - The process requires significant support (handholding) through each step—application process, assessment, interview preparation, post-interview follow-up, etc.
 - Once hired, apprentices may require mentorship and coaching regarding unwritten rules and navigating cultural norms.

Impact and Benefits of Addressing this Target Area

- Minorities may not get an opportunity to achieve a career due to lack of exposure and feel as though they must settle for a job. DEIA strategies will provide more exposure, avenues to new careers and higher wages.
- Also allows us to focus on DEIA in nontraditional occupations where certain ethnic groups are not exposed and do not get opportunities.
- Employers miss out on an opportunity for diverse talent pools and to build diverse talent pipelines.
- Reduces occupational segregation providing underrepresented groups access to higher wage apprenticeship programs.
- Specialized and targeted DEIA strategy allows for employers to tap into more demographic groups because "one size does not fit all."

Ideas for Change

- Improve recruitment and exposure in underrepresented communities
 - Ensure best practices for a fair and inclusive recruitment and hiring process. (Address barriers such as discrimination, prejudice, and unconscious bias)

- Expand apprenticeships in nontraditional sources. Devise specific strategies for different demographic groups understanding “one size does not fit all.”
- Address Rural Areas.
- Greater support for apprenticeship applicants throughout the process
 - Look at what successful pre-apprenticeship programs are doing (and adopt best practices)
 - Leverage trade association programs (what more could they be doing)
- Increase the participation of former apprentices in new RAPs as a mechanism for upskilling/reskilling and a means to create pathways to higher paying occupations and combat occupational segregation.

What subject-matter expert (SME) information do we need

Connect with groups that are doing this work at a high level. For example:

- Leadership Surge
- American Psychological Association
- NABTU/MC3 program

II. Gender

Notes from Discussion:

Define women – LGBTQ+ community; let’s be inclusive and accessible. If we are defining women, it should be people who self-identify as women (similar to 29 CFR part 30 regulations).

Nonbinary – must determine where they fit in. Language from draft WANTO Funding Opportunity Announcement for FY 2022 (not public, still in clearance): Inclusive of transgender women and nonbinary – meant to be as inclusive as possible.

Issues:

- Harassment – particularly for some sectors; **Recommendations:** greater education and awareness; champion a new culture; champion women who get into the program and who can be catalysts for change;
- Safety especially for those getting to work during nontraditional hours
- Culture of inclusion – some women feel driven out of the training program (construction). Need to do more in some sectors. **Recommendations:** Build a cohort; the buddy system, create a culture of inclusion.
- Service vs traditional trade for gender: Low apprenticeship of women; more apprenticeships in construction, etc.
- Less pay for women even though men and women start at the same hourly wage. But in completed category, male apprentices making more than women, who just see a small increase from their starting salary

- Service skills can be a year-long training. **Recommendations:** Look at shorter trainings; can be more competency-based.
- Childcare support is patchy and availability of childcare during nontraditional hours is a barrier. The supply is short; there aren't enough providers or vouchers are limiting;
Recommendation: Onsite childcare can be a solution or partnering with community organizations
 - Single moms or moms of young children have unique sets of challenges:
Recommendations: Are there incentives for say single moms, or young children creating more flexibility; allowing online components of training.** A solution for most people who can do more at home that leads to a job.
- Availability of online courses as well as access to equipment/technology/internet connection; emerging technology can be used as a tool to open up resources and give wider access, but also requires technical support (internet access, technology/devices, etc.)
- Access to construction tools, protective garments also need to be suitable for different genders
- Due to WANTO Act authorizing legislation, WANTO grants can provide funding for supportive services only in pre-apprenticeship training, not once apprenticeships start
- Patchwork of supportive services right now (challenge). Understanding how to navigate the system in a more accessible way would be beneficial. Need accessible resources.
Recommendation: A navigator role in pre-apprenticeship and apprenticeship can help navigate all the funding systems out there. There is a lot out there but it is very challenging.

Questions:

- Intersection between race and gender: the participation is higher of women of color in apprenticeships but for African Americans the wages are even lower on the hourly side.
- Occupational segregation hourly wages low due to concentration of women in lower paying occupations vs. systemic bias (women apprentices have lower pay within the same occupations). More of a difference between occupations than between women and men in the same occupation. Is there a discrepancy between apprenticeship wages between North and South?
- Look at different barriers in skilled trades/manufacturing and emerging service sector.

Spotlight on Women Apprentices OA Data Analysis:

- Since 2013, OA has made significant strides in increasing women apprentices nearly tripling the number of women apprentices from 24K to 74K active apprentices year to date.

- While women apprentices are still underrepresented versus the available workforce, the percentage of active women apprentices increased over that same period to 13.7 percent year to date, a nearly 30-percent increase from 8.9 percent in 2013.
- Women of color are participating in apprenticeships at an even greater rate than their counterparts with African American women 25 percent more likely to be apprentices.
- Women apprentices are more likely to participate in Health, Education, and Hospitality sectors, which have lower hourly wages, so building awareness of career options within traditional higher paying skilled trades and career ladders within emerging service industries are critical. In particular, African American women of color have a lower average hourly wage at completion even vs. other women apprentices.
- Despite obstacles due to need for childcare and other wrap-around services, women apprentices are completing at higher rates than the average possibly also due to shorter training requirements in the service sector.
- Qualitative feedback indicates there is still significant harassment and lack of support for women apprentices in certain industries including construction and transportation.

Resources:

https://womensequitycenter.org/wp-content/uploads/2017/10/Women-Only-Pre-Apprenticeship-Programs_low-res.pdf

III. Individuals with Disabilities and Emerging Technologies

Definition:

On IWDs, let's not reinvent the wheel. Strong 29 CFR part 30 regulations and OA interpretation. Awareness and implementation of requirements is key.

- 29 CFR part 30 interpreted as 7-percent goal national goal for inclusion of people with disabilities in registered apprenticeships. We are far from reaching this goal.
 - The regulation says that programs with five or fewer apprentices are *not* bound by requirements (and thus not calculated in 7-percent goal?):
 - "Nondiscrimination on the basis of sex was added in 1971, as was the requirement for sponsors with five or more apprentices to develop and implement a written affirmative action plan (written AAP) for minorities"
 - "The NPRM estimated that 75 percent of sponsors would have fewer than 5 apprentices and thus be exempt from certain Final Rule requirements. One commenter took issue with the assumption that the 25 percent of sponsors with five or more apprentices will be static over time."
- New focus -- DEIA includes Accessibility, recent change although IWDs are part of 29 CFR part 30 update, has not yet received the same focus

- Only collecting data since 2017 (past 4-5 years). Very small numbers. High nondisclosure. Difficult to do analysis.

Barriers:

- Overall lack of understanding and fear around concerns of people with disabilities need to be addressed.
- Information collection issue – Applicants may not want to self-identify/self-disclose. Very high percentage of nondisclosure, did not provide information (50 percent vs. 5-20 percent among other groups), physical document has IWDs as separate tear-away. Also may be due to fears that disclosure of disabilities may impact hiring and career path.
- Fears on employer side – need for accommodations, expenses, what happens if hurt on job.
- Disaggregation – People with disabilities are not a monolith, very different needs, concerns, abilities. . . “shop for what you need” specifics needed.
 - What are the actual skills needed for the job? Competency-based. Different jobs need different skills. Focus on the abilities, not the disabilities.
 - There may be stereotypes/misconceptions about different disabilities and their types of needs
 - JAN: Job Accommodation Network, free confidential assistance to help resolve accommodation issues
- Role of emerging technology can be transformative. Voice technology, glasses correcting color-blindness, use of robots to do physical work (e.g., warehousing), so specific skills needed by different vs. past, etc.
- Transportation access to get to instruction/job site

Key Questions/Discussion:

- One size does not fit all
- Fear on both sides. . .supply and demand
 - Demand-side: What information do we provide to employers? How can we help create culture of inclusion to address fears and lack of understanding
 - Supply-side: What can we do to create awareness of apprenticeship options? Outreach? What occupations/industries are best fit for different groups of people with disabilities?
- Standards and Goals – Technical Assistance on information. . . DEIA Registered Apprenticeship Technical Assistance Center (DIRATAC) support?
- What are best practices? How can we increase disclosure?
- What are more tools and materials we can use?

- Neurodiversity at Work (SAP, Microsoft) made use of VR. Tie in efforts to apprenticeships.
- Do we design focusing on competencies? Benefits for all, not just eliminating barriers. Pre-apprenticeship support? Cohorts?
 - Buddies, cohorts, mentors – needed. Same support system as for communities of color, women.
- Emerging service industries is it easier to incorporate IWDs?
- Define job in terms of skills needed, not fears
- Who assesses abilities needed?
- Match specifically what is needed with skills and abilities. . .what is actually needed
- Perspective of abilities and curb cut benefits
- Workforce board OJL funds and other supportive funding available to meet needs of IWDs
- Leveraging adaptive technology available
- UDL – adaptive technology
- Transferring knowledge from educational arena to apprenticeship arena – how do we create Individual Development Plans for IWDs in apprenticeship?
- Create a Culture of Inclusion
- We have laws, definitions, models – we need to make sure we have the support system. This is missing component (incentives, grants) philosophy that human rights be inclusive.
- Awareness, communication, support for specific targeted groups.
- Inventory what we have:
 - American Apprenticeship Initiative data 2015 on participants outside of RAPIDS – grants engaging IWDs, employers --- idea, is this an area we looked at. . . Office of Disability Employment Policy (ODEP)?

Recommendations:

- Encourage smaller apprentice programs (fewer than five apprentices) to require/encourage recruitment of IWDs to contribute to USDOL 7-percent goal.
 - Increase education to employers of USDOL accessibility/disability goals.
 - Also consider constraints for apprenticeship programs with fewer than five apprentices (mom and pops) in recruiting IWDs.
- Need for champions (within USDOL?) to encourage employers to reach out into community. USDOL to give assistance (supplying outreach contacts and supporting the employers to ease their fears; guides/resources for employers)?
- Educate employers that USDOL can give support and guidance for recruitment of apprentices with disabilities.
 - Apprenticeships can be virtual.

- USDOL can help with providing access to laptops, etc.
- Increase the use of and education about virtual apprenticeships.
 - Need to make sure apprentices have accommodations they need for access (internet, laptop, etc.)
- Assistive technology vs. accessible technology. Incorporate assistive technology into accessible technology (websites, apps, etc.). Create these technologies and provide them for free?
 - What role can emerging technology play?
- Give incentives to employers for having IWDs
 - These incentives need to align with the needs of employers
- Need for marketing/showcasing diversity of IWDs in apprenticeships. Diversity of disabilities and also diversity in race, gender, etc. in marketing tools, images, etc. Also diversity of industries.
- USDOL to partner with Departments of Rehabilitation (within Department of Education, Office of Special Education) to bring more IWDs into apprenticeships/pre-apprenticeships.
 - Partner with National Disability Institute, but also specific organizations – American Foundation for the Blind, etc. Very different skill sets, very different abilities.
- Expand apprenticeships to other emerging/nontraditional industries that may be more accessible for IWDs
 - Are emerging service industries a better fit for IWDs?
 - What areas of traditional apprenticeship could be a good fit for IWDs?
 - Create more apprenticeship programs for Federal Government/service? (Look at program in Maryland?)
- Improve/expand online resources for employers/sponsors.
 - Create an online space where employers/sponsors can share resources/engage with each other? Right now the outreach is one-way from USDOL website.
 - Supply-side: Shop for what you need. .go to specific areas, specific organizations for each community/organization – vision impaired, hearing impaired different.

Resources and Sources:

- Curbcut article—benefits to people with disabilities, benefit everyone; Janelle Jones Black Women Best framework—when we center policies and lift up those who are most

vulnerable, then we are moving the needle on equity and these policies lift up everyone vs. just relying on averages, which can remain the same as equity gaps widen (the rich get richer, the poor get poorer—the average remains the same)

- Angela Glover Blackwell: The Curb-Cut Effect
https://ssir.org/articles/entry/the_curb_cut_effect
- Janelle Jones et al: https://rooseveltinstitute.org/wp-content/uploads/2020/09/RI_Black-Women-Best_IssueBrief-202009.pdf
- Also track down joint national dialogue on Inclusive Apprenticeships
- Note: Data – Disclosure OA ODEP training at the end of March.
- Emerging Technology – How can apply Technology-driven transformations in apprenticeships (Digital toolkit for quality apprenticeships)
<https://www.ilo.org/global/topics/apprenticeships/publications/toolkit/innovations-and-strategies/innovations-and-trends/technology-transformation/lang--en/index.htm>
- Resources on inclusive apprenticeships:
- From OA ODEP January training on Inclusive Apprenticeships:
 - <https://www.dol.gov/agencies/odep/program-areas/individuals/youth/inclusive-apprenticeship>
 - <https://www.dol.gov/agencies/odep/program-areas/apprenticeship>
- <https://www.urban.org/sites/default/files/publication/104249/inclusive-apprenticeship-a-summary-of-what-we-know-about-apprentices-with-disabilities.pdf>
- Resources on telework/virtual apprenticeships:
 - <https://www.peatworks.org/digital-accessibility-toolkits/telework-and-accessibility/>
 - <https://inclusiveapprenticeship.org/resources/creating-inclusive-virtual-hybrid-apprenticeships/>
- JAN: Job Accommodation Network, free confidential assistance to help resolve accommodation issues
- Legislation Regulation Guidance:
 - <https://www.apprenticeship.gov/about-us/legislation-regulations-guidance>
- <https://www.cbsnews.com/news/autism-employment-60-minutes-2020-10-04/>

IV. Formerly Incarcerated/Justice Involved

How do we define the topic area?

- Inclusive of all adults (including mature adults) and youth that are justice involved/formerly and currently incarcerated.

What are the key issues?

- Need for change in perception of the justice involved workforce for employers.

- Helping employers feel secure with justice involved community. Need for training/mentorship to employers that apprentices are matched to meet their needs (hard and soft skills).
- Apprenticeships available to those incarcerated are not necessarily apprenticeships/skills available when released.
- Pre-apprenticeships could be a vehicle for more apprenticeships for justice involved.
- Age: How do we find apprenticeships that are appropriate for all age groups within justice involved community
- What is the impact of this topic? What are the benefits of addressing this target?
 - Diversifies the workforce with different skillsets.
 - Gives them an opportunity to succeed and not fall to recidivism/reoffend.
 - Creates access to generational wealth.
 - Good for families, ability to provide for their families.
 - Breaks cycle of incarceration in community/family.
 - Improves public safety = cost savings interventions for cities, etc.

Ideas for Change:

- What are the gaps, opportunities, and barriers in terms of the overall process, supply side (apprentices, underserved communities), and demand side (employers, industry) that need to be addressed?
 - Barriers: lack of supportive services, 60-day prerelease access (counselors don't have access until they are released), perception from employers.
- What are the best practices, models, key learnings in this topic area?
 - Need for direct entry to starting work after release (try to reduce recidivism)
 - Connect apprenticeships with jobs pathways: Partnership between employers and apprenticeships to set them up with jobs that are available upon release (e.g., TRAC program).
 - If a program qualifies for funding, etc. they should be held accountable for follow-through of apprenticeship and employment pathway after release.
 - Collaboration between prison programs, to learn best practices or issues from other programs.
- What SME information do we need or data questions do we have?
 - Want data on justice-involved apprentices
 - USDOL does not track these data, they only track prison programs (<3 percent of total apprenticeships are currently incarcerated, of that <3 percent it's mostly men and African American men, completion rate of these programs is higher than the rest of apprenticeships)

- James Owens can provide data on TRAC program
 - The data we get may be lower than what we may expect over the next few years (early release due to COVID-19, etc.)
 - Registered apprenticeships technical assistance centers (run by Jobs for the Future [JFF]), have partnership with university that does research in this area (Julie to find name of partner)
- What further areas of exploration do we suggest?
 - Can we look into issues such as lower wages post release?
- What specific recommendations are we making? Also consider funding and technology.
 - Improve digital access and digital literacy: Increasing access/availability to technology to apply for programs (computers, internet, etc.). Provide training on how to use technology (for those who have been incarcerated for a long time).
 - Different agencies (HHS HUD, etc.) need to come together to provide support services post release. Need for collaborative support network for this community
 - Need for direct entry into starting work after release.
 - Connect apprenticeships with jobs pathways: Partnership between employers and apprenticeships to set them up with jobs that are available upon release

WIOA Funds:

- Hard to utilize because there is a lot of criteria based on financial situations/poverty levels, etc.
- Can use funds for hardhats, boots, etc. to get them started. Can be used for transportation.
 - Many don't use it because the apprentices don't know how to use the funds.
- Once they start getting paychecks it disqualifies them for the funds.
- Community organizations use the funds and assess apprenticeship programs to see who is in need and show them how to use the funds.
- Colleges in west coast are in tune to utilizing these funds. Partnering with community colleges, etc.

Prison Program in Washington: TRAC program

- Women in prison, before release/while incarcerated, 16- to 18-week program. Partner with registered apprenticeships in State for training (ironworker training/construction training/etc.). Then program coordinators of those apprenticeship programs will evaluate them and put them to work right away after release.
- This program is only involved with those currently incarcerated.

- Hard skills and also soft skills training (how to be on time, financial: how to manage checkbook/budget money, etc.

V. Pre-Apprenticeship and Youth

How are pre-apprenticeships and youth apprenticeships defined?

- Under discussion both internally at OA and within ACA Pathways Subcommittee
- Current definition: https://wdr.doleta.gov/directives/attach/TEN/TEN_13-12.pdf from last ACA
- Under discussion:
 - Should pre-apprenticeships and youth apprenticeships be registered?
 - What are key components/standards for registration?
 - How does DEIA fit into pre-apprenticeship, youth apprenticeships?
 - Pre-apprenticeship should be short and directed to getting you into the apprenticeship system
 - Pre-apprenticeships should be directly connected with apprenticeship opportunities – this is the entire purpose of pre-apprenticeships – data analysis question
 - Pre-apprenticeship eligibility requirements and application process should be as inclusive as possible, competency vs. credential-based, simple, straightforward
 - Should youth apprenticeship programs be registered? How will this affect the flexibility of participation? Who is eligible? What is relationship between youth apprenticeships and pre-apprenticeships? What is coordination/collaboration with Job Corps, YouthBuild, and other programs?

The DEIA Subcommittee is concerned with practical aspects of pre-apprenticeship and youth efforts because these are critical in overcoming barriers facing members of underserved communities who are most in need of these efforts. Change begins with pre-apprenticeship and youth outreach to underrepresented groups, including youth, women, individuals with disabilities, people of color, etc.

Quality pre-apprenticeship programs focused on women and other underrepresented groups:

- Strong recruitment strategies focused on outreach to underrepresented groups.
- Inclusion of strategies that increase Registered Apprenticeship opportunities for underrepresented groups, including design of instruction and training with a lens toward these groups.
- Access to or provision of supportive services during the pre-apprenticeship program, upon successful entrance into RAPs, and up until completion of RAPs.
- Transparent entry and success requirements for relevant RAPs.
- Direct assistance to participants in applying to RAPs and continued follow-up and support even when participants do not get in on the first attempt.

Ensure that if pre-apprenticeship programs are “registered,” adequate consultation is done with CBOs who serve underrepresented groups to ensure a common core of criteria is agreed upon and no quality CBOs are unintentionally excluded or “cut” from the group. Also ensure adequate funding is attached to any new standards or data collection since many CBOs already are underfunded.

What would the impact of making changes to the pre-apprenticeship and youth pathways be on advancing DEIA among apprenticeships?

There are many different kinds of pre-apprenticeship activities that could support DEIA, including:

- Ad hoc outreach by employers to the community – inviting community in
 - Open houses for potential applicants to learn about industries with which they have little prior experience
 - Application nights - evening workshops to explain how to fill out application forms
 - Outreach through CBOs – marketing: See the change so you can be the change – diverse representation, targeted outreach by group, go where the communities are using the media best suited to that community (radio, social media, posters/flyers)
- Formal programs, sometimes with wrap-around support services (Oregon Tradeswomen, CWIT, WANTO grants, NABTU MC3 program)
 - Provide awareness and outreach through trade organizations, CBOs, high schools, educational system, grant support
 - Can also provide support with wrap-around services, English classes, equipment, training support in math or other skills needed for apprenticeship
 - Can connect with other agencies, including Job Corps, YouthBuild, etc.
- Opportunities to build multiple on-ramps to apprenticeship programs through cross-training, upskilling, stackable certificates, extended training, multiple trainings?

Key Issues:

Changes in Outreach Efforts:

- Recruiting in the right areas/districts – NABTU 2008 MC3 high school student into construction (model), target more girls, spotlight all-girl schools? Efforts to recruit cohorts of young women in coed schools? Recruiting in more inner cities, but also expanding in nonurban, rural areas. Recruiting in areas related to infrastructure jobs? What happens when jobs are over? Jobs in the area?
- Geographic outreach: increasingly widespread diversity, enclaves of new immigrants/families, pockets of diversity, identifying opportunities on a county-by-

county basis, outreach to rural communities – using technology to help rural communities gain access to training resources

- Targeted recruitment toward members of underrepresented/underserved communities (gender, ethnicity, race, disabilities)
- Outreach – awareness, targeted positioning/message, media outlets
- Outreach to/collaboration with CBOs: Upward Bound, Junior, Achievement, etc. (partners for training programs)
- Should we define community partners? Define underrepresented communities? Title I schools?
- Under-represented populations in apprenticeship – differ by occupation, gender, race, ethnicity
- Demand-side -- employer – invite in community, application nights, etc.
- Supply-side -- applicant – address preconceptions, targeted communication
- Improve recruitment and exposure in underrepresented communities
 - Ensure best practices for a fair and inclusive recruitment and hiring process (address barriers such as discrimination, prejudice, and unconscious bias)
- Expand pre-apprenticeship/youth programs in nontraditional sectors. Devise specific strategies for different demographic groups understanding “one size does not fit all.”
- Address rural areas
- Greater support for pre-apprenticeship/youth applicants throughout the process
- Look at what successful pre-apprenticeship programs are doing (and adopt best practices)
- Leverage trade association programs (what more could they be doing)

DEIA/Recruitment:

- Meaning; recruitment is a positive process of searching for prospective employees and stimulating them to apply for the jobs in the organization.
- When it comes down to DEIA in the recruiting process, we have to think of new ways to attract the diverse candidates that we are looking for.
 - Make hiring diverse candidates a high priority for your recruiting team.
 - Number one, your recruiting team must look like the candidates you are seeking. If your team does not reflect any diversity, there is no way to obtain diversity.
- Organizations have to get outside of their comfort zones. There are areas that certain organizations will not recruit from because of a preconceived notion or unconscious bias. These areas normally reflect the underrepresented communities.
 - Fair and equal treatment is critical for the success of everyone, not just a few; that needs to be the mindset

- In order to retain women, minorities, and people with disabilities, the training and opportunities have to be fair and balanced, or the retention rates will continue to drop.
 - Candidates need and want to know that there is a chance for advancement and upward mobility; they are not just there to fill a quota.
 - The goal today in 2022 of every organization when it comes to DEIA/recruitment must be that it represents the community that it serves; that should be the motto.

Navigation of resources currently available – awareness and implementation strategies to make resources accessible. If you build it, they will come, but they are not coming. How to is the key – making sure pre-apprenticeship resources are accessible and used.

- How can we make the information more accessible? More useful? Navigators/guides, technical assistance, DEIA Registered Apprenticeship Technical Assistance Center (JFF)
- What are the barriers/needs? Cohorts, mentors, buddy system – creation of culture of inclusion
- What is the impact of pre-apprenticeships? Does it open up new pathways for members of underserved communities?
- Do pre-apprenticeships increase career options (advance DEIA in sectors like women in construction, people of color in IT, men in healthcare)?
- Can pre-apprenticeships open up career ladders helping prepare women to be electricians? Bridging transition between different stackable certificates? Creating transitions from housekeeper to hotel management?
- Does/could support provided through pre-apprenticeships increase completion rates?

What are best practices from CWIT and trade/NABTU that can we leverage?

- MC3: Results in larger applicant pool for women, better retention – What are best practices from this model?
- CWIT, Oregon Tradeswomen, etc.?
- Prisma, YTTW?
- Urban?

What tools and resources can we use? Universal Outreach Tool – local opportunities, more purposeful addition of resources? Updating?

<https://www.apprenticeship.gov/eo/sponsors/recruit-and-hire/universal-outreach-tool>

Collaboration among different pre-apprenticeship recruitment efforts:

- Siloing – cross-recruit, awareness of all apprenticeship programs, not just health, all apprenticeship options
- Requirement to share information on opportunities in all sectors? Core “101” information sharing basic apprenticeship information? Recruitment and exposure to apprenticeship as a whole and diverse opportunities?

How can pre-apprenticeships support career pathways? Stackable certification – credentials, near completer, chronically out of work – pre-apprenticeships can provide a viable option no matter where/when you start. On-ramps to career “jungle gym” vs. career “ladder.” Do pre-apprenticeships support equity at all levels? How are different apprenticeship programs connected?

Targeted DEIA Marketing:

- Realistic messaging -- show construction for what it is, emphasize financial benefits (no college debt, earn-as-you-learn, development of skills leading to higher paying jobs)
- Marketing is critical: realistic, show the right visuals, how many women, communities of color, representation
- Strong recruitment policies for underrepresented populations – subject to the same 29 CFR part 30 regulations?

Pre-apprenticeship curriculum includes: job readiness, English classes, math courses, GED support. Also need wrap-around services (transportation, childcare, funding). One-stop center to assist in navigation of process for women, communities of color, people with disabilities.

Ensure that if pre-apprenticeship programs are “registered,” adequate consultation is done with CBOs that serve underrepresented groups to ensure a common core of criteria is agreed upon and no quality CBOs are unintentionally excluded or “cut” from the group. Also ensure adequate funding is attached to any new standards or data collection since many CBOs already are underfunded.

Explore business engagement options to partner with technical colleges or community partners whereby pre-apprenticeship program completers are provided the opportunity to engage with employers seeking recent graduate candidates.

For instance, our local technical college is providing a C.N.A. pre-apprenticeship program that includes job readiness training as follows:

- Resume content/resume writing
- Resume critique reviews
- Interview skills/mock interviews
- Customer service

Once the participants complete the C.N.A. curriculum, the employers are invited to engage and connect with completers to provide job openings, benefits, and opportunities for career development. This allows a new connection point with candidates without mandating a direct hire requirement for pre-apprenticeship providers. As a result, the pre-apprenticeship provider can provide evidence a good-faith effort was provided to connect participants to employment opportunities. The job readiness training will provide the participants with the tools to present their skills in a positive manner. This could be a “win-win” for both the pre-apprenticeship provider and employers seeking viable candidates.

DEIA Pre-Apprenticeship and Youth Programs

- Discrimination, implicit bias, and unconscious bias in pre-apprenticeship/youth outreach and recruitment.
- Lack of DEIA awareness, bias, or lack of cultural intelligence may adversely impact the pre-apprentice selection pool.
- Stereotypes on “what it takes to be a viable candidate for a particular job,” pre-conceived notion of who is a “fit” for a job or that a person cannot do a job based on race and ethnicity may impact pre-apprentice selections.
- Overreliance on traditional sourcing pools may limit access to underrepresented pre-apprentice/youth talent pools.
- Failure to proactively seek out and cultivate relationships with nontraditional sources may limit access to underrepresented pre-apprentice/youth talent pools (e.g., faith-based organizations, YWCAs, etc.).
- Pre-apprenticeship/youth programs designed using a one-size-fits-all strategy may have limited success finding untapped talent across multiple demographic groups (e.g., different strategy may be required to tap into Asian talent pool vs. Black talent pool or Native American talent pool).

Potential Applicants and Selected Apprentices

- No exposure to certain career paths. Your race and ethnicity dictate what you will become in life. Lack of confidence or a feeling that you are not intelligent enough to do the job or do not deserve the opportunity.
- Family and support system bias against pre-apprenticeship/youth programs prevent potential applicants from pursuing programs and limit community support of apprenticeship programs.
- Burdensome application and selection process significantly reduces a pre-apprentice/youth applicant chance of being accepted into a program and succeeding once selected. Impediments include:
 - Assessments, the selection process, and managers not adequately trained in DEIA result in a disparate impact.
 - The process requires significant support (handholding) through each step—application process, assessment, interview preparation, post-interview follow-up, etc.
 - Once selected, pre-apprentices/youth may require mentorship and coaching regarding unwritten rules and navigating cultural norms.

Impact and Benefits of Addressing this Target Area

- Minorities may not get an opportunity to achieve a career due to lack of exposure and feel as though they must settle for a job. DEIA strategies will provide more exposure, avenues to new careers and higher wages.

- Also allows us to focus on DEIA in nontraditional occupations where certain ethnic groups are not exposed and do not get opportunities.
- Pre-apprenticeship programs lacking DEIA will adversely impact the registered apprenticeship program, causing employers to miss out on an opportunity for diverse talent pools and to build diverse talent pipelines.
- DEIA within pre-apprenticeship/youth programs reduces occupational segregation, providing underrepresented groups access to higher wage apprenticeship programs.
- Specialized and targeted DEIA strategy within pre-apprenticeship/youth programs allows for employers to tap into more demographic groups because “one size does not fit all.”

Professional sources to consider to increase DEIA within pre-apprenticeship/youth programs:

- Historically black colleges and universities
- National Association of Black Social Workers
- National Association of Black Counselors
- National Black Nurses Association
- National Black Contractors Association
- National Association of Hispanic Nurses
- National Hispanic Psychology Association
- American Association of Hispanics in Higher Education
- National Hispanic Medical Association
- National Congress of American Indians
- National Indian Education Association
- Association of American Indian Affairs
- Native American Nurses Association
- National Association of Asian American Professionals
- The Association of Asian American Social Workers
- Association of Asian Health Care Professionals
- Association of Asian American Psychologists
- National Taskforce on Tradeswomen Issues
- CWIT
- Apprenticeship and Nontraditional Employment for Women
- Moore Community House
- Tradeswomen Inc.
- USDOL Women’s Bureau

Links to Resources:

- https://wdr.doleta.gov/directives/attach/TEN/TEN_13-12.pdf

Add best practices, models from:

- Stephanie: YTTW Pathways
- Ray: NABTU MC3 program

- Val: PRISMA training
- Donna: CWIT
- Traci: Urban

Additional Questions:

- How effective are pre-apprenticeships?
- What are components of success?
- What percentage of pre-apprenticeships lead to apprenticeships?
- Are pre-apprenticeships a successful tactic in increasing DEIA?
- What percentage of pre-apprenticeship participants come from underserved communities?
- How effective are targeted efforts by specific groups?
- Would collaboration among groups be helpful?

What further areas of exploration do we suggest?

- Educational system (all levels)
- Under-represented communities
- Rural areas
- Correctional system
- Job fairs, career days, and open house events

VI. Incentives and Procurements

Topic for Discussion:

- How do we define incentives?
 - Employers - a payment or concession to stimulate greater output or investment. Tax credits to support tuition also resources for small businesses that hire apprentices
- Awards of Federal contracts (including subcontracts) are themselves an incentive – a big one. Companies whose business models depend on Federal contracts have very strong incentives to do whatever it takes to be eligible for and win such contracts and to have them renewed. This gives leverage to procurement standards. What are the key issues?
- Navigation and Marketing/Awareness:
 - Need support in making information accessible, provide support in navigating the system
 - Explore potential of “one stop” collaboration between agencies to pull together patchwork of support available
 - Continuity of resources – where is permanent link? Can we create repository? Can the DEIA data centers help facilitate?

- Federal Resource Playbook: Including incentives (tax breaks, funding) for employers to provide wrap-around support services for apprenticeship
- Example: WorkforceGPS – focused information in easily accessible format.
- Key issues in procurement/contract area:
 - Identifying the nexus between procurement and apprenticeship/DEIA.
 - Many if not most subcontractors either aren't aware of the standards required of subcontractors regarding workforce and DEIA. Many aren't even aware that they are subcontractors subject to these procurement standards.
- What is the impact of this topic?
 - Failure to provide incentives may deter employers from participating in Apprenticeship programs.
 - Failure to provide incentives to apprentices decrease the percentage of underrepresented participants; therefore, the Office of Apprenticeship may not meet the established goals for expansion
 - Failure to provide wraparound incentives for apprentices may lead to a lower number of completers
- What are the benefits of addressing this topic?
 - OA will be able to expand and increase the number of participants
 - Apprentices will be more likely to complete if given the appropriate incentives to overcome barriers to participation (e.g., transportation, housing, utilities, childcare)
 - The Office of Apprentice will be able to meet its completion goals for underrepresented populations

Ideas for Change:

- What are the gaps, opportunities, and barriers in terms of the overall process, supply side (apprentices, underserved communities), and demand side (employers, industry) that need to be addressed?
 - Demand Side Barriers – Employer Issue of Independence: Trade and other organizations, business, culture of community, may not want to take advantage of incentives/resources because they value their independence more than the resource due to loss of control, stringent requirements, cultural distrust of government (applicants and employers), low DEIA #s. Employers want their independence from governmental requirements. However, this is less true for Federal contractors – winning the Federal business is worth the perceived trouble for most.

- Supply Side Barriers – Apprentices lack the clarity regarding how to apply or provide evidence of eligibility for incentives (e.g., transportation, housing, utilities, childcare). The application process is complicated and may require collaboration between governmental partners (e.g., colleges, Adult Ed, and Workforce Centers)
- What are the best practices, models, key learnings in the topic area?
 - Outreach/Targeted campaigns:
 - ROSIE GIRLS to encourage more girls to consider STEM careers
 - Johnson & Johnson “*Are you man enough to be a nurse*” to encourage more men to choose the nursing profession
 - *South Carolina Hospital Association’s Be Something Amazing*, to encourage high school students to consider the health science cluster, complete virtual job shadowing, and work-based learning while pursuing a career in healthcare; includes pre and post surveys to measure engagement
 - Pre-apprenticeship C.N.A. job readiness business engagement with technical colleges to connect completers with employers

Leverage lessons learned from Davis Bacon in construction in other industries and sectors?

- What SME information do we need, or data questions do we have?
- What further areas of exploration do we suggest?
- What specific recommendations are we making? Also consider funding and technology

Brainstorming feedback below:

- How do we help you complete your apprenticeship/increase your completion rate – what resources are available through which avenues?
- Incentives both for employers and for applicants
 - Legislative incentives – available to registered apprenticeships only
- Include DEIA as part of evaluation for receiving aid?
- Include DEIA as part of evaluation for being awarded a Federal contract/subcontract?
- Barrier:
 - Example: JFF promote apprenticeships in manufacturing (have incentive funds that they can pass on supportive services) about half (\$100,000 given out last year) – don’t take advantage of incentives because want independence
 - Note: DEIA is a requirement of Registered Apprenticeship: outreach and equity measurement/affirmative action plan, targeted recruitment required

- Awareness and Implementation (high school/GED), good faith efforts required – link between incentive funding and DEIA requirements?
 - DEIA requirement not enforced – only necessary to make a good faith effort. Even that minimal requirement is not always enforced.
- Promote awareness among MOB, CBOs, etc. to take advantage of incentives
- Barrier: Training and Retention – sometimes employers take money, but do not mentor and train
 - How can we create safe place to learn, mentors, support, scaffolding learning – exposure to role models
 - Encourage “Caregivers who look like our community” Diverse communities (community hospitals, natural connection)
 - Best Practices from Prisma – Safe place to thrive – training and career progression
- Big Idea – Need to create culture of inclusion
- Support mandate of culture of inclusion from top down– ambassadors/trailblazers, changing culture – then recruitment naturally follows
- Regulations are a blunt instrument that may not always have the intended effect
 - True. But in general, regulations are sticks: “you must” Incentives are carrots: “if you want something (a grant, a contract), here are the conditions for getting it.”

How can we incentivize good actors?

- DEIA factor in consideration for receiving funding – rubric? Evaluation of actions supporting DEIA?
 - For incentives (grants, tax credits)
 - For contracts. There has been a lot of push-back from industry against requiring certain kinds of performance *as a condition of receiving* a Federal contract. Suggest ACA do keep this issue on the table and more research, to make a recommendation for its final report.
- Equity report cards? We have a good system/standards, let’s elevate good actors and spotlight them on web, social media, photo ops with Federal Government leadership
- Can we offer streamlined processing for good actors?
- Industry recognition awards for DEIA (e.g., Rosie the Riveter Certification Awards)
- Apprenticeship Ambassador Initiative and Industry Liaison Sector approach

- Link Universal Outreach Tool: (excellent resource, could be more intentionally developed): <https://www.apprenticeship.gov/eeo/sponsors/recruit-and-hire/universal-outreach-tool>
- More information on conference Val attending? Possible collaboration?

Procurement

Here are the Subcommittee's January recommendations on this:

OA should work with OFCCP to strengthen contractor requirements for DEIA in the construction industry to increase demand for apprentices from underrepresented groups.

- The goals applicable to construction need updating to align them better with current Supreme Court precedent on affirmative action. Specifically, the 6.9-percent participation goal for women, applicable nationwide, is too low in many places and for many trades. The numeric participation goals for minorities aggregate the minority racial and ethnic groups together, masking underrepresentation of individual race or ethnic groups. The minority goals are also based on the 1970 Census. The goals also should be determined based on measures that do not lock in the current representation of a group, because current representation reflects years of discrimination, and the current good-faith standard should be strengthened.
- Apprentice utilization goals by trade should be established for construction workforce to ensure that entry-level jobs are available on federally contracted and federally assisted construction work.
- Processes and requirements for large infrastructure projects ("mega-projects") should be established. These should include requiring projects to establish and provide resources for regular community input information about goals and to make information about the progress that contractors make toward their goals to be available to the public, so that community groups can monitor participation in real time. They also should include requiring Federal agencies to include contractors' participation in mega-projects and adherence to their Affirmative Action Plans as a bid condition and in their contracts.

Suggest rewriting this to expand it to pre-apprentices; give more background on existing procurement levers; and expanding it to Federal contractors outside of construction. Revised text to read as follows:

The Subcommittee's overall recommendation is that OA should work with OFCCP to strengthen contractor requirements for DEIA, which should increase demand for apprentices and pre-apprentices from underrepresented groups.

Background: Under long-standing Federal law, Federal contractors and subcontractors are required to provide equal employment opportunity to all their employees (including their apprentices), and to take affirmative action to promote their equal opportunity. This means not discriminating on the bases of race, color, national origin, sex, and disability (as well as religion,

sexual orientation, gender identity, veteran status, and because they have violated any employer rule requiring pay secrecy). It also means that Federal contractors have to make good-faith efforts to employ women and people of color in proportion to their representation among workers in the local area who are qualified for the occupation in question. For example, if 40 percent of bookkeepers in the Washington, D.C., area are African American, a Federal contractor in that area would have to make good-faith efforts to meet the goal that 40 percent of its bookkeepers be African American. OFCCP, which is an office within USDOL, enforces these requirements. In addition, the goal for individuals with disabilities, for all occupations, is 7 percent.

Because apprenticeships are entry-level jobs, there is likely to be a wider pool of workers in their areas who are qualified to be apprentices, and those pools are likely to include a greater proportion of women and people of color than the pools of workers who are qualified for jobs that require the skills that someone already trained for an occupation will have. Thus, increased use of apprenticeship is a way that Federal contractors can bring in more diverse workforces, and be more able to meet their affirmative-action goals. For that reason, increasing the use of apprenticeship among Federal contractors can be an important way to facilitate DEIA.

However, outside of construction and perhaps some manufacturing, Federal contractors are not widely aware of apprenticeship at all, let alone as a strategy for increasing their employment of underrepresented groups and meeting their affirmative-action goals.

OA should work with OFCCP to help them educate the Federal contract community about registered apprenticeship and encourage them to use it more.

There are some special considerations applicable to Federal contractors and recipients of Federal financial assistance in the construction industry. OFCCP has predetermined goals for the employment of women and minorities in construction. For women, that goal is 6.9 percent; for people of color, the goal varies according to geographic area. These goals have not been updated since they were first set in place in the Carter Administration.

- The goals applicable to construction need updating to align them better with current Supreme Court precedent on affirmative action and with present-day demographics. Specifically, the 6.9-percent participation goal for women, applicable nationwide, is too low in many places and for many trades. The numeric participation goals for minorities aggregate the minority racial and ethnic groups together, masking underrepresentation of individual race or ethnic groups. The minority goals are also based on the 1970 Census. The goals also should be determined based on measures that do not lock in the current representation of a group, because current representation reflects years of discrimination, and the current good-faith standard should be strengthened.
- Processes and requirements for large infrastructure projects (“mega-projects”) should be established. These should include requiring projects to establish and provide resources for regular community input information about goals and to make information about the

progress that contractors make toward their goals to be available to the public, so that community groups can monitor participation in real time. They also should include requiring Federal agencies to include contractors' participation in mega-projects and adherence to their Affirmative Action Plans as a bid condition and in their contracts.

An even more direct way to encourage apprenticeship (and the diversity that comes with more entry-level jobs – i.e., more apprentices) would be for some or all Federal contractors to be required to use a minimum percentage of apprentices. For the construction workforce, where apprenticeship is extremely common, OA should work with OFCCP to establish apprentice utilization goals by trade. In other industries where apprenticeship is less common and not necessarily appropriate, OA should work with OFCCP and stakeholders to determine a methodology for encouraging or requiring a minimum apprentice utilization requirement.

Research Questions:

- What resources/incentives are available?
- What percentage employers/applicants are aware of resources/incentives available?
- What percentage are eligible for these resources?
- What percentage take advantage of these resources?

Incentives/Resources

- State Apprenticeship Tax Incentives: Employer tax credits available for hiring apprentices – WorkforceGPS, State Tax Credits, and Tuition Support, <https://www.apprenticeship.gov/investments-tax-credits-and-tuition-support/state-tax-credits-and-tuition-support>
- Small Business Tax Credit for hiring apprentices: Own a small business? Check to see if you qualify for these tax credits, <https://dor.sc.gov/resources-site/media-site/Pages/Own-a-small-business--Check-to-see-if-you-qualify-for-these-tax-credits.aspx>
- Trends and Incentives in Workforce Development (see pay for success resources), https://www.ncsl.org/Portals/1/Documents/legisbriefs/2020/FebruaryLBs/Workforce%20Development_06a.pdf

The following is all from USDOL's "Federal Resources Playbook for Registered Apprenticeship,"
<https://www.apprenticeship.gov/sites/default/files/playbook.pdf>:

- USDOL funding under the Workforce Innovation and Opportunity Act (WIOA)
 - Assistance with training and tuition costs.
 - Support for training expenses through OJL contracts
 - Coverage for supervision and extraordinary training costs.
 - Provision of additional recruiting, placement, and support services, including pre-apprenticeship training and assistance in recruiting and placing apprentices, as well as support services such as transportation, books, supplies, and childcare.
 - WIOA funding for incumbent worker training.

- Trade Adjustment Act funding can reimburse employers for training workers that have been laid off because of foreign trade
 - H1B funding is aimed at training American workers and reducing dependence on foreign labor
 - WANTO grants can be used to support pre-apprenticeship and apprenticeship programs.
- Federal Student Aid Funds
 - Pell grants to cover all or most of the cost of tuition and fees, as well as books and supplies for the technical instruction portion of an apprenticeship
 - Federal Work Study (FWS) funds to pay a portion of the training wages of eligible students who are apprentices while they are enrolled in eligible certificate or degree programs.
 - The Coronavirus Aid, Relief, and Economic Security (CARES) Act funding for emergency financial aid grants
- GI Bill and Veterans Benefits -- Veterans who are participating in a Veterans Affairs-certified apprenticeship can use the GI Bill toward tuition, fee payments, books, and supplies, and even a Monthly Housing Allowance (MHA)
- U.S. Department of Agriculture -- Supplemental Nutrition Assistance Program: Employment and Training Programs
- U.S. Department of Transportation: Federal Highway Administration: On-the-Job Training and Supportive Services Program
- U.S. Department of Housing and Urban Development: Section 3 Covered Housing and Urban Development Financial Assistance Programs

Interim Report Appendix III: Ex Officio Federal Workgroup Recommendations

The Ex Officio Federal Workgroup discussed ways to leverage the power of the Federal Government to support efforts to expand, diversify and modernize Registered Apprenticeship opportunities. The organizing framework of discussions revolved around the 5 “Ps”: policy, procurement, personnel, partnerships, and programs. Below provides an outline of the key recommendations for consideration.

1. Partnerships: Develop a national sector approach to apprenticeship to help address key industries with labor shortages

Identify critical industries and occupations in key areas of the economy, including transportation (*trucking), clean energy, infrastructure, education, and healthcare.

2. Procurement: Embed Registered Apprenticeship as an allowable employment and training strategy in Federal procurements

Identify potential funding announcements and opportunities for coordination, including opportunities coming out of the Bipartisan Infrastructure Law.

3. Personnel: Expand Federal Government apprenticeships with focus on creating greater diversity across Federal jobs

Start with common occupations across most Federal agencies and leverage existing platforms such as the Office of Personnel Management Federal Pathways programming.

4. Policy: Create clarity on pre-apprenticeship and youth apprenticeship and how that articulates up into post-secondary options and the world of work

Policies should consider elements such as quality training, worker voice, DEIA, and safeguards for young apprentices.

5. Programs: Create more program alignment at the Federal level by describing (in funding/policy) how pre-apprenticeship, youth apprenticeship, and Registered Apprenticeship fit into career pathways

Consider process to recognize quality pre-apprenticeship programs. Streamline data collection to support eligibility across Federal programs.

Addendum A: Living Wage Resolution and Explanatory Statement

Be it hereby resolved that –

To address the occupational segregation in apprenticeship that has relegated underrepresented and historically marginalized populations to low-paying, dead-end apprenticeships or has denied them access to apprenticeship altogether; to ensure that underrepresented and historically marginalized populations do not continue to be tracked into low-paying, often dead-end jobs through apprenticeship; to ensure that apprentices have the skills needed to get a job that commands a living wage when they finish their apprenticeship; to make it worthwhile for individuals to invest their time and, often, money in apprenticeship; and to avoid compromising the quality and rigor of the Registered Apprenticeship system, the ACA advises the Secretary of USDOL that --

1. OA should revise the definition of “apprenticeable occupation” in 29 CFR 29.4 as follows:
 - A. To add to the definition of “apprenticeable occupation” in 29 CFR 29.4 a requirement that, for an occupation to be apprenticeable, the prospective sponsor must demonstrate that the wage profile for that occupation by the last stage of the apprenticeship prior to completion pays a living wage based on local living standards; individual programs that register programs utilizing those occupations would be expected to propose a wage schedule in accordance with that occupation’s wage profile. for their locations.
 - B. The term “living wage based on local living standards” is defined as 200% of the Federal poverty level (FPL) for a family of three, adjusted by a geographic cost-of-living differential for regions where the cost of living exceeds the Federal average.
2. Taking into account any future recommendations of the Advisory Committee on Apprenticeship and any public comment, OA should decide how to implement section 1 of this Resolution, including (but not limited to) how to determine the geographic cost-of-living differentials; whether and how to account for employee benefits; how to handle apprenticeship programs that are currently registered and do not meet the requirement of section 1 (e.g., whether to allow a phase-in period or “grandfathering” in of programs that do not meet the new standard); and whether any other change(s) to 29 CFR part 29 or part 30 need(s) to be made to effectuate section 1.

Submitted on behalf of
(list in formation):

Ray Boyd, United Association of Journeymen and Pipe Fitting Industry of the United States and Canada

Daniel Bustillo, 1199 SEIU Training and Employment Funds, Service Employees
International Union
John Costa and Jamaine Gibson, Amalgamated Transit Union, AFL-CIO/CLC
Stephanie Harris-Kuiper, Training & Development Fund District 1199J, American
Federation of State County and Municipal Employees
William Irwin, Carpenters International Training Fund
Erin Johansson, Jobs with Justice
Donna Lenhoff, Chicago Women in Trades
Vicki O'Leary, Ironworkers International
Bernadette Rivera, Laborers' International Union of North America
Anton Ruesing, International Finishing Trades Institute, International Union of Painters
and Allied Trades
Traci Scott, National Urban League
Todd Stafford and Marty Riesberg, Electrical Training ALLIANCE

EXPLANATORY STATEMENT

This Explanatory Statement first describes the resolution that the undersigned recommend and the reasons why the Committee has enough information to be able to vote on it today. It also contains background on living-wage ordinances and responses to additional questions asked in the wage guidance that OA circulated to the ACA on April 19, 2023, and in other Subcommittees' comments.

This Statement does not contain the robust economic, social, and equity rationales for this recommendation – for that, please refer to the DEIA Subcommittee's section 2 in Addendum B, "DEIA Subcommittee Statement on Family-Sustaining/Living Wages," which we incorporate by reference.

The Recommended Resolution

This recommendation is different from the one the ACA passed at the March 2023 meeting, primarily because this recommendation uses the term "living wage" instead of "family-sustaining wage" and includes a specific definition of the term. The primary reason that some ACA members felt that they do not have enough information to make an informed decision was that they didn't know what the standard of a "family-sustaining wage" is. In fact, as Group 2 of the IENES Subcommittee and others have noted, the terms "family-sustaining wages" and "living wages" are, in general, not clearly defined. Developed to distinguish the FPL wage, which rarely is sufficient to cover the costs of a reasonable living standard for a worker and their family, the terms are often used interchangeably to mean the general concept of a wage rate that supports the economic self-sufficiency of a worker/family for full-time work.¹⁵

To clarify the precise requirement and to avoid confusion, *this* recommendation defines the wage standard very clearly as –

200% of the FPL for a family of three, adjusted by a geographic cost-of-living differential for regions where the cost of living exceeds the Federal average.

This formulation is based on the methodology used by a number of cities and counties that have adopted "living wage" standards (more on that below).

With this definition, it can no longer be claimed either that the wage standard is not clearly defined or, as Group 2 of the IENES Subcommittee argued, that the lack of a clear definition makes a wage standard infeasible.

¹⁵ Sometimes the two terms are understood to distinguish between a wage rate sufficient to cover the costs of a reasonable living standard for a worker alone ("living wage") and a wage sufficient to cover the costs of a reasonable living standard for a worker *and their family* ("family-sustaining wage") and their family, but this distinction is not reliable – for example, the MIT tool is called the "Living Wage" Calculator, but what it calculates is family-sustaining wages.

First component of the recommended definition: the Federal poverty level

As the below table shows, the FPL for a family of three in 2023 is \$24,860; 200% of that is \$49,720. (The poverty level for other family configurations is also shown for comparison.) 200% of the FPL was the precise suggestion of one of the Pathways Subcommittee members.

Federal Poverty Level

Family Size	Annual Federal poverty wage (2023)	Hourly (2,080-hour year) Federal poverty wage	200% of the FPL – annual	200% of the FPL – hourly
Individual	\$14,580	\$7.01	\$29,160	\$14.02
Family of 2	\$19,720	\$9.48	\$39,440	\$18.96
Family of 3	\$24,860	\$11.95	\$49,720	\$23.90
Family of 4	\$30,000	\$14.42	\$60,000	\$28.85

The Pathways Subcommittee suggested that the tool used to calculate the appropriate wage for apprentices should be one that is updated annually for inflation, is evidence-based, and accounts for regional differences in cost of living. The FPL meets two of these criteria: it is updated annually for inflation, and it is evidence-based. It does not, however, account for regional cost-of-living differences.

Second component of the recommended definition: the adjustment for a geographic cost-of-living differential

In order to account for regional cost-of-living differences, the recommendation would further adjust the 200%-of-the-FPL standard *by a geographic cost-of-living differential* for regions where the cost of living exceeds the Federal average. (We note that this step would not be necessary if the Massachusetts Institute of Technology (MIT) Living Wage Calculator were used, because that calculator is not only updated annually for inflation and evidence-based, but also accounts for regional differences in cost of living (down to the county level).)

Consistent with OA's stated preference that the ACA's recommendations focus more on goals and principles than on a specific means of implementation, the recommendation leaves the decisions about how to determine the geographic cost-of-living differentials and to make the adjustments to OA. We see this as a strategic recommendation that allows OA flexibility in the means of implementation. In this connection, we would like to direct OA's attention to what is

probably the most used tool for determining cost-of-living differentials, the Cost-of-Living Index (COLI) published by the [Council for Community and Economic Research \(C2ER\)](#). According to C2ER's website, the COLI is "the most consistent source of city-to-city cost comparisons available [and] is recognized by the U.S. Census Bureau, U.S. Bureau of Labor Statistics, and CNN Money."

BACKGROUND ON CITY/COUNTY LIVING WAGE ORDINANCES

Beginning in the mid-1990s, more than 140 cities and counties all over the country adopted "living wage" ordinances, applicable to government contractors and, in some places, businesses benefiting from government assistance, to pay workers a wage rate sufficient to lift them above the FPL. Many such ordinances are calculated as a percentage of the Federal poverty wage required for a specified family size (which is used as the universal standard), plus a cost-of-living premium. Where the percentage of the Federal poverty wage is set at 100%, the wage is generally that needed to support a family of four. Here are some examples:

- a. San Jose calculated its original living-wage wage rate in 1998 by adding a 45% cost-of-living premium to 100% of the FPL for a family of three; this came out to as \$9.50/hour with benefits and \$10.75 without benefits. They review the rate every year, and it goes up with the consumer price index. Right now, the San Jose living-wage rate is **\$26.96 per hour** (if health benefits are not offered). (Compared to the MIT living wage calculator, that would be about the same rate (\$26.86) as for a person with no children.)
- b. Lawrence, KS: Living wage level is set at 130 percent of the FPL for a family of three.
- c. Lansing, MI: Living wage level is set at 125 percent of the FPL for a family of four. (Employers may deduct health insurance costs from the wage level (up to 20 percent of the wage).
- d. New Britain, CT: Living wage level is set at 118 percent of the FPL for a family of four.

In fact, many jurisdictions' *minimum* wage rates are in the range of 200% of the FPL for one individual – for example (from University of California, Berkeley tracker, [here](#)):

Denver (2023): \$17.29/hour
Berkeley (2022): \$16.99/hour
Emeryville (2022): \$17.68/hour
San Francisco (2022): \$16.99/hour
Oakland (2023): \$15.97/hour

This means that RAPs in these locations are currently paying this level of wages to apprentices when they *first* enter an apprenticeship. Since apprentices earn progressively higher wages as they advance through their program, by the time they are in the last stage of their program, their employers are by definition paying them more than these minimum wages.

**RESPONSES TO ADDITIONAL QUESTIONS ASKED IN OA WAGE GUIDANCE
AND IN OTHER SUBCOMMITTEES' COMMENTS**

1. As OA noted in its wage guidance, before any programs (and the occupations covered by those programs) are registered, an occupation must be deemed to be apprenticeable. USDOL sought to clarify that the ACA's recommendation regarding wages would apply to USDOL's review of proposed apprenticeable occupations such that USDOL would approve an occupation as suitable for apprenticeship upon the prospective sponsor demonstrating that the wage profile for that occupation upon completion of the apprenticeship meets a certain threshold. Individual programs that register programs utilizing those occupations would then be expected to propose a wage schedule in accordance with that occupational profile. USDOL suggests that this is the most feasible way to implement any recommendations regarding wages.

We intend the apprenticeability-determination process to proceed in the way that USDOL outlines, with the *caveat* that the determination must be based on local living standards. Thus, the wage profile for the occupation must be for the particular location(s) in which the prospective sponsor operates its RAP(s), and the sponsors that register programs utilizing that occupation would be expected to propose a wage schedule in accordance with that location-specific wage profile.

If the above approach proves unworkable, we suggest that OA instead add the requirement of "living wage based on local living standards" and the definition of that phrase to the required contents of RAPs' Standards under 29 CFR 29.5. For example, Group 1 of the IENES Subcommittee suggested a mechanism involving Registration Agencies' approval of prospective RAP sponsors' applications for registration: that only apprenticeship programs that, at a minimum, pay their participants a living wage by the last stage of their program participation may be approved.

2. We agree with OA that a workable model for achieving a living wage by the last stage of an apprenticeship prior to completion is for USDOL to recognize apprenticeable occupations that propose to embed interim credentials (and off-ramps) as part of an occupation that meets the overall wage criteria: in other words, stackable credentials, not stackable apprenticeships.
3. Time Periods to Apply Wage Standards. USDOL asks if there is a corresponding standard that we are seeking to establish for apprentices *during* their apprenticeships. The answer is no. If OA wishes to suggest such a standard, nothing in this recommendation would interfere with its doing so.
4. OA asks how this recommended standards would apply to in-school (16-18) youth participating in youth apprenticeship programs (vs. an individual aged 18-24 participating in a Registered Apprenticeship program). The recommendation applies in

the same way to all RAPs and to all registered apprentices, regardless of age or matriculation status. Such broad application will both ensure that young adults are able to support themselves (and their children – many in-school youth are themselves parents of young children) while avoiding any potentially exploitative child labor practice. We note that to the extent that in-school youth work for employers for fewer hours per week than apprentices who are not in school, their wages (as opposed to their wage rates) will be lower.

5. Group 2 of the IENES Subcommittee asks whether existing apprenticeable occupations that do not meet the new wage standard for apprenticeability would be “grandfathered” in. The Group points out that, on the one hand, grandfathering existing occupations in could put an unfair and unreasonable burden on new occupations; but on the other, if they 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 new wages requirement and infrastructure in place to execute that system. These are considerations that OA should take into account as it decides the implementation issues outlined in Paragraph 2 of the Resolution.
6. Group 2 of the IENES Subcommittee suggests that rather than applying a wage threshold to apprenticeability determinations, USDOL should apply a formula that includes whether the occupation is part of a pathway that *leads to* family-sustaining wages and whether the *journey-level* wage equals the threshold (among other criteria).

As to the first criterion, even if an occupation leads to family-sustaining wages – i.e., is part of a pathway of “stackable apprenticeships” -- there is no assurance that an apprentice in that program will take the next steps to enter into the next apprenticeship on the pathway, or the apprenticeship after that. Nor is there any guarantee that there will be openings in the next apprenticeships on the pathway for an apprentice in the first program or that an apprentice from the first program will be accepted into the next program(s) on the pathway. On the other hand, if it is all one apprenticeship (in the “stackable credentials” model mentioned above), at least some of that uncertainty is removed – by definition, the apprentice who enters and succeeds at the first level is guaranteed a place at the next level, etc.

As to the second criterion, it proves either too much or too little. If the journey-level wage equals a family-sustaining wage, then the wage for the apprentice at the last stage of their apprenticeship will be so close to the journey-level, family-sustaining wage that it would be almost as difficult for the RAP employer to pay as paying the family-sustaining wage would be – indeed, in RAPs in traditional-apprenticeship occupations, the journey-level wage is usually set at 90% or 95% of the journey-level wage. On the other hand, if the family-sustaining, journey-level wage is significantly higher than the wage for the apprentice at the last stage of their apprenticeship, it would be unlikely for there to be more than a few journey-level jobs for the apprentices to get upon completion, for the same reasons that the last stage of apprenticeships to train for those

occupations doesn't pay a family-sustaining wage. There would be little point in going into an apprenticeship that results in little likelihood of landing a family-sustaining job at the end.

7. Group 2 states that requiring apprenticeship programs to achieve living or family-sustaining wages before program completion could lead to the opposite of USDOL's goal of encouraging more industries and companies to adopt Registered Apprenticeship. Even if that is true, we do not agree that USDOL's primary goal is or should be to encourage more industries and companies to adopt RAPs regardless of wages or any other impact on the well-being of apprentices. To the contrary, the Fitzgerald Act, which initially established Registered Apprenticeship in Federal law, authorizes the Secretary of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices." While this provision also promotes extension of "application of such standards by encouraging the inclusion thereof in contracts of apprenticeship, to bring together employers and labor for the formulation of programs of apprenticeship, [and] to cooperate with State agencies engaged in the formulation and promotion of standards of apprenticeship," nowhere does it sanction extension of Registered Apprenticeship through approval of standards that do not "safeguard the welfare of apprentices."
8. Group 2 asks how a wage standard based on family structure would apply to an apprenticeship in which the apprentices represent a variety of family structures. We agree that a wage standard cannot result in two apprentices who enter the same program being paid at different rates based on their particular family structure. However, Group 2's question fundamentally misapprehends how wage standards work. Like the minimum and prevailing wage, the living wage applies to all covered employees, regardless of their family structures. Family structure may be used to determine what the living wage would be – but once it is determined, the wage would apply in the same way to all covered employees. Thus, Group 2's criticism that "[u]sing a family structure to determine appropriate wages for an apprentice would disproportionately and negatively impact workers who are parents" and "disincentivize employers from hiring parents" is not an accurate statement. For the same reason, Group 2's argument that use of family structure to determine the living wage could give rise to "constitutional issues or civil rights or EEO violations" is not accurate.
9. Group 2 argues that "[i]t is impractical to apply a requirement to employers, as wages are currently only recommended in the Schedule D of Apprenticeship Standards." To the contrary, Schedule D of Apprenticeship Standards (the Employer Acceptance Agreement template) specifically *requires* participating employers to "subscribe[] to the provisions of the Apprenticeship Standards . . . and agree[] to carry out the intent and purpose of said Standards . . . and accompanying Appendices," and Appendix A of the Standards contains the progressive wage schedule outlining the wages that the participating employers must pay.

10. Finally, Group 2 asserts that "[t]here would be a marketing problem if employers were told what they are required to pay in order to work with Registered Apprenticeship." Participating employers in a Group apprenticeship are already told what they must pay by the sponsor, with the Registration Agency's approval and through negotiation with the union if it is a joint program. The employer in an Individual Joint apprenticeship similarly sets the wages with the Registration Agency's approval and through negotiation with the union. The employer in an individual non-joint program must only get the approval of the Registration Agency for the wages it sets.

But in all these cases, there is a floor below which the wages cannot drop: the employer is required to pay the highest of the Federal (or State, if there is one) minimum wage; the prevailing wage (if the work is on a Davis-Bacon-covered or similar contract); and the city/county living wage (if there is one, and if the work is funded by city/county contracts). The recommendation simply adds another floor: 200% of the Federal poverty wage for a family of three, adjusted by a geographic cost-of-living differential for regions where the cost of living exceeds the Federal average.

Addendum B: Subcommittee Perspectives Regarding Family-Sustaining Wages

At its March 30, 2023 meeting, the ACA directed the Subcommittees of the ACA to work to come up with additional detail and recommendations that could be put forward in terms of how to operationalize a wage standard, such as family-sustaining wages, as it relates to Registered Apprenticeship. This addendum presents the results of that Subcommittee work. These Subcommittee perspectives should be read alongside the other ideas that each Subcommittee put forward in their issue brief addendums for appropriate context.

Apprenticeship Pathways: Pre-Apprenticeship, Youth Apprenticeship, and Degree Apprenticeship Subcommittee

RAPs must include a progressive wage scale for all work performed throughout the apprenticeship, including in-school youth apprenticeships; RAPs should result in a living wage at completion and lead to long-term financial growth and stability for the participant; and the tool used to calculate a living wage needs to be one that is updated annually for inflation, accounts for regional differences in cost of living, and is evidence-based.

Increasing Diversity, Equity, Inclusion, and Accessibility Subcommittee

1. Family-Sustaining/Living Wage

During the March 30th meeting, the ACA voted to approve the following recommendation:

A Registered Apprenticeship must end in a family-sustaining wage.

There was strong consensus among the ACA during the public vote supporting this recommendation with only one member voting no and five abstaining.

This recommendation also reflects the joint principles developed by Commerce and USDOL in the “Good Jobs Initiative” to create a framework for workers, businesses, labor unions, advocates, researchers, State and local governments, and Federal agencies for a shared vision of job quality. The principle defining job quality in terms of pay states: “All workers are paid a stable and predictable living wage before overtime, tips, and commissions.” (see Appendix III).

2. DEIA Subcommittee Statement on Family-Sustaining/Living Wages

The lack of wage standardization in alignment with consumer buying power in apprenticeships has contributed to the economic disparities and instability that our country has experienced in the past. With the increasing demand for skilled labor and a shrinking workforce, it is imperative

that the Committee addresses this issue to avoid another economic collapse with disproportionate impact based on race, gender, ability, and residence.

Apprenticeships have long been a pathway for individuals to gain valuable skills and secure high-paying jobs, but not for everyone. For many women and African Americans, apprenticeships fail to deliver on these promises. Women account for only 14% of all apprentices in RAPs and are concentrated in lower paying service jobs. Women earn only two-thirds of what men earn, making on average \$10 less per hour. Economic outcomes of women have a direct impact upon childhood poverty rates. Sixty percent of African American households are led by women (married or otherwise). While they represent the highest portion of homes living in poverty, their pay contrast is \$15 less per hour than White men in apprenticeships. Studies show that equal pay would cut poverty in half.

But the issue the Subcommittee presents today is not simply about pay equity. The crux is ensuring equitable access to family-sustaining careers through any apprenticeship. History tells us that when pay does not keep pace with cost of living, the economy suffers. According to the National Bureau of Economic Research (NBER), a little-known contributing factor to the Great Depression was the fact that pay did not keep pace with the cost of living. In 1929, the minimum livable wage for a family was the equivalent of \$9 in today's currency. Wage policy and practice missteps eventually caused more than 3-in-4 families to fall into poverty during the Depression. NBER also reveals that pay between industries, including union jobs, also played its part. Manufacturing versus Utilities labor earnings in 1932 were equivalent to \$9.32 and \$14.59, respectively. Racial, gender, and disabilities prejudices and deeply entrenched cultural perceptions manifested through occupational segregation, in its historical context, cannot be overlooked. Prior to 1929, immigrant and African Americans were limited to low paying jobs such as Domestic Workers (Housekeeping, Cooks, Janitors). Today, Housekeeping and Culinary apprenticeships are among the top apprenticeships for African Americans due to historical barriers. African American men make the lowest wages of any men apprentices upon completion due to a higher concentration in lower paying jobs. On completion women make even less than African American men, and African American women make the lowest wages on completion of any group. During the COVID-19 pandemic, just as during the Great Depression, Black and Hispanic unemployment were the highest of all demographics. One could look at history and see that having a job isn't a sufficient guard against poverty and economic insecurity, nor is using the Federal minimum wage as a goal post.

Apprenticeship wages can lead to a family-sustaining income; however, that is not a statement of guarantee. It is true that some, not all, apprenticeships lead to good paying jobs but some reach that upon entering an apprenticeship, others upon exit, others years later, and some never. Keep in mind that nearly half of all apprentices do not complete their apprenticeships, with African Americans having the lowest at 41% of any group. Simply, the American worker without financial safety nets does not have the time to wait. Wage suppression has created a

dire sense of urgency to earn enough to survive. According to the National Low Income Housing Coalition, the average wage of \$18.78 is not enough to afford a two-bedroom apartment in any State. Millions of families literally can no longer afford delay or inaction on the conversation of wages in apprenticeships. This is not to ignore the tremendous challenges and impacts that would be made to collective bargaining, project costs, resetting wage scaffolding, connecting wages to skills, and labor law.

3. Terminology/Definition: Family-Sustaining/Living Wages

The DEIA Subcommittee has used “family-sustaining wages” and “living wages” interchangeably to indicate wages that will allow workers to earn enough income to afford adequate shelter, food, and other necessities based on local geographic area. The details need to be worked out, but the DEIA Subcommittee remains steadfast in the commitment to the public vote of the ACA committee on March 30, 2023, and the principles of the “Good Jobs Initiative” jointly developed by the Departments of Commerce and Labor.

4. Interim (Stackable) Credentials, Not Stackable Apprenticeships

The Subcommittee is also in agreement with the approach of creating pathways through Registered Apprenticeship programs in the newly emerging service industries that leverage learnings from the success of the pathways currently established in the construction and building trade industries. From the March ACA meeting discussion, there appears to be an emerging consensus behind an approach that would recommend that USDOL could recognize apprenticeable occupations that propose to embed interim credentials (and off-ramps) as part of the occupation that would meet the overall family-sustaining or living wage criteria. USDOL has stated this would be a workable approach.

Registering one apprenticeship providing stackable credentials ending in a family-sustaining or living wage would both streamline the process for employers and ensure that apprenticeships would end in providing a living wage. The DEIA Subcommittee provides the following example describing details of the career path in healthcare and how this approach could work:

High school juniors and seniors enrolled in health sciences pathways and dual enrolled in technical colleges may choose to begin their career journey as a youth apprentice. During the summer of their senior year, they complete the certified nursing assistant (CNA) course at age 18, earn the credential and become eligible for promotion to the patient care technician (PCT)/patient services technician (PST) at graduation). If they choose to continue with a technical college, they can continue to the next level of practical nurse upon completion of the diploma, pass the National Council Licensure Examination (NCLEX) exam, and become eligible for promotion to the LPN if they

choose, they can continue to the next level of registered nurse (RN) once they complete the associate degree of nursing, pass the NCLEX exam and gain a license as a RN.

This is their “on-ramp” to living wages and family-sustaining income. For working adults in nursing entry level roles (i.e., CNA, PCT/PST, etc.), the apprenticeship model may provide the best option to assist team members to increase income and career mobility. While working adults are employed in an entry-level role, participants are not likely to have extra income to use traditional tuition reimbursement models, which require them to pay up front and wait until the end of the semester to be reimbursed, make installments payments as you go, or go into further debt via student loans.

Using the Apprenticeship model, employers can assist working adults to utilize a combination of grant funds, supportive services, and a create a compensation plan that allows participants to “earn and learn” while ascending to a higher degree as well as maintain a quality of life while on their educational journey. Again, the apprenticeship model is their “on-ramp” to living wages and family-sustaining income.

The Subcommittee believes that the pathways to family-sustaining or living wages need to be clearly outlined from the beginning and communicated to the apprentice as a prerequisite for an apprenticeship to be registered and that the employer must agree to support and mentor apprentices who wish to complete the entire pathway. Care should be taken to track progress and provide support for apprentices moving along the pathway to ensure that apprentices, and especially apprentices from underserved communities who have experienced systemic discrimination, are not “stuck” on the bottom rungs of the career pathway.

Recommendations and/or Best Practices

Our goal is to leverage leading indicators to amplify the potential of Registered Apprenticeship to create a positive, healthy culture of inclusion and equitable development to benefit all apprentices and the economy as a whole.

The new things the Committee needs to focus on are systemic changes to:

- Use Leading Indicators to Proactively Support a Healthy Culture of Inclusion
 - o Addressing concerns and removing barriers for potential, current, and alumni apprentices to connect with jobs that provide a family-sustaining or living wage

Industry Engagement in New and Emerging Sectors Subcommittee

The below represents nonconsensus views among the IENES Subcommittee in response to the request that Subcommittees consider any implications of the recommendation that a “Registered Apprenticeship must end in a family-sustaining wage.” Each of the following two groups represents approximately half of the membership of the Subcommittee.

Group 1

Labor
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. Group 1 further recommends that USDOL only approve registration of apprenticeship programs that, 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 must 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 needs to 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 USDOL 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, that does not pay workers a living wage, but that 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

Employer	Public
Amy Kardel	Orrian Willis
Carolyn Holmes Lee 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 USDOL 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, USDOL 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, California 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 USDOL’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
 - National Center on Education and the Economy (NCEE) Pathways 2-pager – <http://ncee.org/wp-content/uploads/2023/03/GlobalModelCareerPathways.pdf>
 - [Qualifications Frameworks](#) (QFs) 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 there currently is not 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 USDOL's goal of encouraging more industries and companies to adopt Registered Apprenticeship.

- Since the concept of FSW is based on family structure, how would the Department 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 Apprenticeship.

Apprenticeship Modernization Subcommittee

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

- Programs with high completion percentages in which the journey-level wages are family-sustaining wages with benefits, allowing one adult to support two children, according to the [MIT living wage calculator](#).
 - OA and the SAAs 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.
 - OA and the SAAs 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.

Addendum C: Family-Sustaining Wages Supplemental Information for the Record

In addition to the Subcommittee perspectives on family-sustaining and living wages presented in Addendum B, ACA members were invited to submit any supplemental information on this topic for the record. Members of the public also submitted information related to family-sustaining and living wages. The items listed below present a complete list of all materials that were submitted to the ACA for the record on this issue. All of these items were posted to the ACA website, as they were submitted.¹⁶

- [Letter from NASTAD to the ACA](#), submitted by Todd Berch
- [Letter from Associated Builders and Contractors \(and 10 other construction and business associations\) to the ACA](#)
- [Letter from Randi Wolfe, PhD, Executive Director, Early Care & Education Pathways to Success \(ECEPTS\), to the ACA](#), submitted by Randi Wolfe, PhD
- [Manufacturing Institute Statement](#), submitted by Carolyn Lee
- [Living Wages and Stackable Apprenticeships and Credentials](#), submitted by Randi Wolfe, PhD

¹⁶ U.S. Department of Labor, ApprenticeshipUSA, "Advisory Committee on Apprenticeship: Meetings," <https://www.apprenticeship.gov/advisory-committee-apprenticeship/meetings> (last visited May 1, 2023).

Addendum D: Increasing Diversity, Equity, Inclusion, and Accessibility Subcommittee Year 2 Issue Brief

Subcommittee Members (by sector):

Employer	Labor	Public
Karmela Malone	Raymond W. Boyd	Donna Lenhoff
Mark Wagner (delegate)	Stephanie Harris-Kuiper	Robbie Melton
Valerie S. Richardson	Vicki L. O’Leary	Traci R. Scott

OA Subcommittee Leads: Julie Wong, Patricia Garcia, Vanietta Armstrong

ACA Subcommittee Spokespersons: Donna Lenhoff, Val Richardson

ACA Members from Other Subcommittees: N/A

1. Year 2 DEIA Issue Statement Topic:

Define leading indicators to flag critical emerging issues and opportunities in the Registered Apprenticeship and pre-apprenticeship ecosystems so that they can be addressed in a systematic and proactive way to promote DEIA in order to meet industry demand for skilled workers by:

- 1) Tapping into the strengths and talents of the United States’ increasingly diverse communities
- 2) Providing “Good Jobs” according to the principles of USDOL and Commerce (see Appendix III)

2. Issue and Background

The Registered Apprenticeship ecosystem is currently focused mostly on reacting to lagging indicators evaluated on a program-by-program basis. Registration agencies (OA and the SAAs) routinely review RAPs to see how they performed on DEIA (and other) metrics *in the past*; they can step in to address reports of violations that occurred *in the past*; and apprentices may file complaints of discrimination that they have suffered *in the past* (although, due to fears of retaliation and futility, they rarely do so).

Moreover, the Registered Apprenticeship ecosystem gets the majority of its information only from the employer/RAP side, and by definition that information is only about individuals already in the system—meaning that we have no way of capturing data about the needs of and barriers facing individuals who are considering apprenticeship or those who considered but elected not to pursue it. It is critical that the Department captures valuable data from both sources.

Responding to what has happened in the past is important and necessary, but it is a limited tool for predicting trends, preventing recurring discrimination, or incentivizing deep culture change.

Registered Apprenticeship and pre-apprenticeships are powerful levers for ensuring equitable jobs. Indeed, existing regulations (29 CFR part 30) specifically prohibit discrimination by gender, race, ethnicity, and disability status (among others), and regulations must be enforced as inclusively as possible.

3. Strategic Importance of the Priority Issue

The U.S. economy currently sits at almost \$23 trillion, but if the United States eliminated racial disparities in health, education, incarceration, and employment, the U.S. economy could be \$8 trillion larger by 2050.¹⁷ Over the past 30 years, if economic opportunities had been equitably distributed by gender, race, and ethnicity, the U.S. economy would be double its current size.¹⁸

Economic inequality is a serious and chronic problem in the United States. According to the US Census, in 2021 income inequality increased, driven by real declines in incomes at the bottom.¹⁹ Households headed by African Americans have the lowest, and households headed by Hispanics have the second-lowest median incomes—\$48,297 and \$57,981 respectively—compared with \$77,999 for households headed by whites. The median income for all female-headed households with no spouse present is only \$51,168.²⁰ While the average income of households headed by Asian Americans, Native Hawaiians, and Pacific Islanders (AANHPI) in the aggregate is comparable to the income of households headed by whites, AANHPI communities have the broadest range of incomes of any racial or ethnic group masking inequities. For example, when disaggregated, the AANHPI communities include groups such as Burmese Americans with average incomes of only \$44,000.²¹

Apprenticeship has a strategic role to play in addressing economic inequality, because it has long been an effective way to raise one's income. But despite improvements, Registered Apprenticeship continues to reflect the inequalities, occupational segregation, and discrimination of the larger economy. As the ACA reported in May, women currently represent only 14-18% of apprentices and most women apprentices are in the health, hospitality, education, and care economy sectors, which have lower hourly wages on completion; African

¹⁷ Ani Turner, "The Business Case for Racial Equity: A Strategy for Growth," The Kellogg Foundation, 2018, <https://www.businesscaseforracialequity.org/>.

¹⁸ Shelby R. Buckman, Laura Y. Choi, Mary C. Daly, Lily M. Seitelman, Nicole Fortin, Erik Hurst, "The Economic Gains from Equity," The Brookings Institute, Sept. 8, 2021, <https://www.brookings.edu/articles/the-economic-gains-from-equity/>.

¹⁹ Jessica Semega and Melissa Kollar, "Increase in Income Inequality Driven by Real Declines in Income at the Bottom," Sept. 13, 2022, <https://www.census.gov/library/stories/2022/09/income-inequality-increased.html>.

²⁰ https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-hinc/hinc-04.html#par_list_13.

²¹ Abby Budiman and Neil G. Ruiz, "Key facts about Asian Americans, a diverse and growing population," Apr. 29, 2021, <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans/>.

American apprentices have the lowest completion rate and the lowest hourly wage at completion of any race or ethnicity; and while Hispanic apprentices make a strong showing in the high-paying construction sector, they are underrepresented in STEM fields. AANHPI apprentices are the most underrepresented group of any race or ethnicity. The percentage of Native American apprentices appears to be drifting down. It is difficult to assess apprentices with disabilities as little data are available. Moreover, egregious incidents like nooses (as happened at the Obama Presidential Center site in Chicago as recently as November 2022)²² or and even fatal assaults (such as when black female apprentice carpenter Outi Hicks was bludgeoned to death in a racist assault at her worksite in Fresno, CA,²³ a few years ago) continue to occur at sites where apprentices work.

These are not isolated incidents, but rather the tip of the iceberg. The majority of Registered Apprenticeship positions are available in the construction industry. A recent study commissioned by the National Institute of Building Sciences found that 72% of Black respondents and 66% of women respondents stated they have experienced discrimination or prejudice while at work. Other nonwhite racial groups also reported discrimination at levels ranging from 35% to 48%. Many of the respondents reporting discrimination said they had to work harder than others to be valued in their roles in the construction industry. The Joint Center for Political and Economic Studies²⁴ highlighted concerns about ongoing racial exclusion and harassment on construction sites, stating that “Black men report that they do not receive the informal mentoring on the job site that white men receive and are more likely to be blamed when mistakes are made.”²⁵ The Joint Center also found that “employers continue to leave Black journeymen in lower-wage jobs in the [construction] industry, while white workers are the most likely to be hired in higher-wage jobs, such as construction managers and supervisors.” Citing BLS, the Joint Center reported that “[j]ust five percent of construction supervisors are Black, while 90 percent are white.”^{26,27}

²² Amir Vera and Joe Sutton, “Noose found at Obama Presidential Center construction site, officials say,” CNN, Nov. 10, 2022, <https://www.cnn.com/2022/11/10/us/noose-obama-presidential-center-reaj/index.html>.

²³ Debra K. Rubin, “Jobsite Killer of Woman Carpenter Apprentice Gets 15-Years-to-Life Sentence,” Feb. 25, 2020, <https://www.enr.com/articles/48733-jobsite-killer-of-woman-carpenter-apprentice-gets-15-years-to-life-sentence>.

²⁴ Alex Camardelle, “Five Charts To Understand Black Registered Apprentices in the United States,” Mar. 20, 2023, Joint Center for Political and Economic Studies, <https://jointcenter.org/wp-content/uploads/2023/03/Five-Charts-To-Understand-Black-Registered-Apprentices-in-the-United-States.pdf>.

²⁵ Kris Paap, “How Good Men of the Union Justify Inequality,” 2008, *Labor Studies Journal* 33(4) 371–92, <https://journals.sagepub.com/doi/abs/10.1177/0160449x08322773>. “Although the construction industry does offer many well-paying, desirable occupations, it is not an industry seen as being accessible to all. On the contrary, this industry is generally regarded as hostile to women and has often created union and industry rules to exclude women, people of color, and immigrants.”

²⁶ U.S. Bureau of Labor Statistics, “Employed persons by detailed occupation, sex, race, and Hispanic or Latino ethnicity,” <https://www.bls.gov/cps/cpsaat11.htm> (last updated Jan. 25, 2023).

²⁷ Peter Fabris, “Study finds racism, discrimination common in construction industry,” Aug. 25, 2021, <https://www.bdcnetwork.com/study-finds-racism-discrimination-common-construction-industry>.

The Joint Center also noted that “[t]hese issues are pronounced for Black women who sit at the intersection of racist and sexist harassment in the construction trades.”²⁸ In the Institute for Women’s Policy Research’s (IWPR) survey of tradeswomen, 55.7 percent of all women respondents report at some point notifying a supervisor or other company official, their business agent (senior union official) or staff overseeing their apprenticeship program of harassment or other form of discrimination. The U.S. Equal Employment Opportunity Commission (EEOC) Harassment Study summarizing representative surveys of sex-related harassment concluded that 40% of women had “experienced one or more specific sexually-based behaviors, such as unwanted sexual attention or sexual coercion”; 60% of women had experienced “gender harassment,” defined as “sexist or crude/offensive behavior” or “hostile behaviors that are devoid of sexual interest”; and 35% of lesbian-, gay-, or bisexual-identified respondents “who reported being ‘open’ at work” had experienced workplace harassment. In the Federal Motor Carrier Safety Administration (FMCSA) Crime Prevention for Truckers survey²⁹ in 2022, one-third of surveyed women truckers reported that in the previous 2 years, they had experienced inappropriate touching (pp. 49-50) -- though some women truckers criticize this is as “a significant undercount.” The *Bloomberg Law Daily Labor Report* found that 38% of women truckers state that they were threatened verbally with physical harm; and 15% that they were hit, pushed, or physically hurt. Women were twice to four times more likely than nonminority men to be touched without permission and *minority women were up to nine times more likely be physically harmed*.³⁰ Additional data provided in the appendices.

A recent study by the North American Builder’s Trade Unions and the University of Oregon Labor Education and Research Center found that Registered Apprenticeship programs and unions have the potential to support greater equity and inclusion in the construction industry showing that “union apprenticeship programs provide significantly better outcomes overall for

²⁸ Roberta Hunte, “Black women and race and gender tensions in the trades,” 2016, *Peace Review* 28(4) 436-443; Donna Bridges, Elizabeth Wulff, Larissa Bamberry, Branka Krivokapic-Skoko, and Stacey Jenkins, “Negotiating gender in the male-dominated skilled trades: A systematic literature review,” 2020, *Construction Management and Economics* 38(10), 894-916.

²⁹ Federal Motor Carrier Safety Administration, “Crime Prevention for Truckers Study,” Nov. 2022, <https://www.fmcsa.dot.gov/research-and-analysis/crime-prevention-truckers-study>.

³⁰ IWPR, Ariane Hegewisch and Eve Mefferd, “A Future Worth Building: What Tradeswomen Say about the Change they Need in the Construction Industry,” Nov. 2021, https://iwpr.org/wp-content/uploads/2022/02/A-Future-Worth-Building_What-Tradeswomen-Say_FINAL.pdf; U.S. EEOC, “Select Task Force on the Study of Harassment in the Workplace,” 2016, https://www.eeoc.gov/sites/default/files/migrated_files/eeoc/task_force/harassment/report.pdf; Federal Motor Carrier Safety Administration, “Crime Prevention for Truckers Study,” Nov. 2022, <https://www.fmcsa.dot.gov/research-and-analysis/crime-prevention-truckers-study> (pp. 49-50), though some women truckers criticize this is as “a significant undercount”; Lillianna Byington, “Harassment of Women Truckers Spurs Drivers, Agency to Seek Fixes,” *Bloomberg Law Daily Labor Report*, Dec. 12, 2022, <https://news.bloomberglaw.com/daily-labor-report/harassment-of-women-truckers-spurs-drivers-agency-to-seek-fixes>. 38% that they were threatened verbally with physical harm; and 15% that they were hit, pushed, or physically hurt. Women were twice to four times more likely than nonminority men to be touched without permission; minority women were up to nine times more likely be physically harmed.

women and [Black, Indigenous, and people of color (BIPOC)] compared to non-union programs.”³¹

This is why one of the overarching recommendations in the ACA’s May 2022 Interim Report was that *DEIA should be intentionally embedded throughout the Registered Apprenticeship ecosystem*. As mechanisms for doing that, the Report recommended thoroughly implementing existing DEIA requirements (29 CFR part 30); creating RAP cultures of inclusion and removing other barriers preventing individuals from underserved communities from enrolling and succeeding in RAPs; and removing barriers that industry faces in identifying and retaining apprentices from underrepresented populations and other underserved communities.

While implementing those recommendations from the May Interim Report remains crucial, by focusing on leading indicators and proactively using those indicators to anticipate, prevent, and incentivize, our recommendations for the next phase of ACA work goes a step further.

4. Recommendations and/or Best Practices

Our goal is to leverage leading indicators to amplify the potential of Registered Apprenticeship to create a positive, healthy culture of inclusion and equitable development to benefit all apprentices and the economy as a whole.

The new things we need to focus on are systemic changes to:

- Use Leading Indicators to Proactively Support a Healthy Culture of Inclusion
- Initiate Systematic Assessments Focused on People, As Well As Programs
 - o Create survey focused on apprentice experience to fill gaps in current data
Leverage Apprentice Survey, existing internal and external data to construct leading indicators that measure progress towards DEIA goals and remaining challenges, in particular using equity indices to compare access to opportunities by region, industries/occupations, education/skill levels, wages/hours/promotions before, during, and after the apprentice lifecycle.
- Establish Data-Driven Feedback Loop to Measure Progress & Implement Changes
 - o Collect data to measure progress towards DEIA goals and remaining challenges
 - o Identify leading indicators flagging barriers to and opportunities for advancing equity to get ahead of discriminatory practices before they become grievances
 - o Develop whole-of-Registered-Apprenticeship-ecosystem strategies reviewing data quarterly and taking action on key findings from the data on an annual basis to close the feedback loop

³¹ Larissa Petrucci, “Constructing a Diverse Workforce: Examining Union and Non-Union Construction Apprenticeship Programs and their Outcomes for Women and Workers of Color,” Nov. 2021, https://cpb-us-e1.wpmucdn.com/blogs.uoregon.edu/dist/a/13513/files/2021/11/Constructing_A_Diverse_Workforce.pdf.

- Make Sure to Connect All Apprentices with “Good Jobs”
 - Design or promote career paths from lower-paying to higher-paying jobs to combat occupational segregation, especially in the service industry
 - Increase representation of underrepresented groups and other underserved communities in new emerging sectors, such as finance and technology
 - Increase diversity in higher-paying jobs in sectors traditionally relying on apprenticeships, such as construction

Develop Systematic Assessment Focused on People, As Well As Programs

As an initial matter, the Subcommittee sees a huge gap—a “missing piece”—in the data that the Registered Apprenticeship system currently has available to it from which to craft leading indicators: while RAPIDS and the other information systems that the Registration Agencies use provide information on RAPs and on apprentices’ demographic characteristics, there is no systematic way of assessing Registered Apprenticeship *as it is experienced by the apprentices themselves*. To address this gap, the Subcommittee recommends that, as soon as feasible, OA establish a *new data source: a regular, anonymous survey of apprentices’ and recent apprentice exiters’ experiences—on which to base leading indicators*. Conducted by OA on a nationwide basis, this survey will provide feedback that is “people-focused,” not “program-focused.” It should also track apprentices from outreach through program participation and as they become established in their careers and leadership positions.

The idea is not unprecedented: the ACA recommended apprentice surveys in its May 2022 Interim Report and the Rhode Island SAA already conducts annual surveys of apprentices.³²

Apprentice Survey cadence. Frequency of survey administration should depend on the length of the apprenticeship and extend throughout and beyond the apprenticeship term. The survey should be administered during onboarding, annually or at the midpoint of the apprenticeship, when exiting or completing the program, 6 months after completion, and once a year for 5 years after completion.

Apprentice Survey characteristics. To preserve reliability, the surveys must be anonymous, and to maintain anonymity, they must be administered by Registration Agencies, independent of RAPs and employers. Sampling should be sufficient to produce representative data by underrepresented population, major occupation group, and State.

The Apprentice Survey can include questions about problems (e.g., harassment, nooses, pornographic graffiti) but should also assess apprenticeship quality overall (for example, asking

³² In England, the Institute for Apprenticeships and Technical Education (IFATE) conducted a survey of apprentices in 2022 (<https://www.instituteforapprenticeships.org/reviews-and-consultations/reports/apprentice-panel-survey-october-2022/>) and one in 2020 (<https://www.instituteforapprenticeships.org/reviews-and-consultations/reports/apprentice-panel-survey-august-2020/>) and apparently intends to conduct one annually.

apprentices to rate if they are getting enough work assignments and if they are getting training in all the work processes that they need, on a scale of 1-5). Questions must remain essentially the same from year to year to permit comparisons over time.

Subcommittee members suggested a number of questions for the survey that would inform leading indicators. Questions were suggested to assess the health and inclusiveness of RAP cultures; other questions were suggested to help assess what is arguably the flip side of healthy, inclusive cultures—the prevalence of bullying, harassment, intimidation, and retaliation—by asking apprentices and apprentice exiters about their experiences with the most prevalent forms of harassment on the job, *quid pro quo* and hostile-work-environment harassment. These questions are provided in Appendix II to this Issue Paper.

Constructing Leading Indicators by Leveraging Existing Data and Combining It with Findings from New Apprentice Survey

In this issue paper, the Subcommittee cannot definitively identify the leading indicators that the Registered Apprenticeship ecosystem should use; that is a task for the ACA in the future. But the Subcommittee does recommend that the leading indicators be chosen specifically so that Registered Apprenticeship can address, for each underrepresented group, at minimum the following issues:

[Indicators of apprenticeship conditions]

- Prevalence of discriminatory entry barriers to particular occupations, especially those that pay a family-sustaining wage
- Use of career ladders leading to occupations that pay a family-sustaining wage
 - Barriers to apprentices advancing through, sticking with, and completing their programs
 - Prevalence of healthy, inclusive workplace cultures
 - Prevalence of bullying, harassment, intimidation, and retaliation
 - Equity in work-hour assignments

[Indicators of effectiveness of Registered Apprenticeship ecosystem efforts]

- Effectiveness of marketing and recruitment efforts including wrap-around services
 - Impact of technical assistance to RAPs on DEIA
 - Impact of OA's grant-making on DEIA

The data that the leading indicators will be based on will vary according to subject-matter. Some leading indicators will be based on data gathered in the Apprentice Surveys. The leading indicators will also leverage existing data in particular equity indices that compare the probability that any given outcome will be experienced in general vs. the likelihood of that outcome occurring equitably within a specific group. Some will be based on internal data that is already or can be available to OA; these internal data include RAPIDS data and data from the Apprenticeship Program Reviews (APRs) and Extended Apprenticeship Program Reviews (EAPRs) that OA conducts.

Some leading indicators will be based on external economic data or published studies. Recognizing the vast availability of third-party data, recommend that additional data sources be explored that may be used to either augment the survey, inform new leading indicators, or both. Some meaningful leading indicators may not be achieved through survey or readily known. But by fully leveraging data mining capabilities and predictive analytics, relevant and actionable insights can be gleaned that may inform emerging leading indicators. Most leading indicators will be constructed of data from a combination of these data-sources. Moreover, there is some overlap: some data sources will be relevant to more than one leading indicator.

None of these data sources alone is perfect. Because apprentices' memories and perceptions are not 100% accurate, it is useful to supplement data from Apprentice Surveys with information from programs. While RAPIDS data on apprentices' demographic identification are self-reported, they are reported to the RAP/employer (not anonymously) and they are not always provided, suggesting that it is useful to supplement them with data from Apprentice Surveys. Data from APRs and EAPRs conducted in any given year represent only a small portion of all RAPs; moreover, these data are not yet retrievable in any automated fashion. Data from external studies or workforce-wide sources may not be specific enough to apprenticeship. For these reasons, the leading indicators should be constructed by combining as many of these data sources as are available.

The following table shows one example of leading indicators and the sources of data from which indicators could be constructed. See Appendix I for full table.

Leading Indicator	Apprentice Survey	Internal Data	External Data
<i>All data to be analyzed by sex, race, ethnicity, disability status, occupation, and location.</i>			
Use of career ladders leading to occupations that pay a family-sustaining wage	<p>Questions about <i>opportunities</i> to pursue higher-level training (e.g., diploma or associate degree, etc.), including the marketing, promotion, and awareness of higher level opportunities</p> <p>Questions about <i>barriers</i> preventing pursuit of a higher level of training (e.g., cost of tuition, books, supplies, transportation, childcare; wage or benefit loss while in class)</p> <p>Questions that identify effective strategies that increased the likelihood apprentices leveraged career ladders to pursued training for higher wage occupations.</p> <p>Questions about apprentices' reasons for not pursuing training for higher-wage occupations</p>	<p>Comparative USDOL RAPIDS analyses of active and completed apprentices in occupations that do pay a family-sustaining wage vs. those that do not</p> <p>Analysis of RAPIDS data on frequency of individuals completing successive apprenticeships in a career ladder (i.e., completers of one RAP who transition to higher level/longer RAPs)</p>	<p>Specific analyses for specific occupations where there is a range of training required and wages paid. E.g., in health care: Census Bureau data on % of licensed practical nurses (LPNs) or RNs from different demographic groups over time</p> <p>Other published relevant research. E.g., in health care, there is published research on rate of CNA/home health aides who progress up the career ladder to LPN or RN positions by race (Sick and Loprest, Employment and Earnings Outcomes by Length and Occupation of Healthcare Training (2021)).</p> <p>Public data on amounts of Apprenticeship, WIOA, or sector-specific grant funds (such as Health Profession Opportunity Grants) available to assist apprentices to overcome financial barriers and progress up the career ladder</p>

Establish Data-Driven Feedback Loop to Measure Progress and Implement Change

Of course, it is not enough just to establish leading indicators. Their purpose is to drive root-cause problem-solving. Thus, the Registered Apprenticeship ecosystem—OA, the SAAs, and OA's grantees and contractors—must use leading indicators to guide proactive, systematic monitoring and create an actionable feedback loop. It needs to develop targets for changes to leading indicators year-over-year. For example, if the leading indicator on Healthy Inclusive Cultures shows that only 40% of apprentices in manufacturing apprentices are experiencing healthy cultures, OA could set a goal of increasing that number by 5% each year for 5 years, and then measure the change each year.

To affect the leading indicators, the Registered Apprenticeship ecosystem has a number of tools at its disposal:

- OA and the SAAs can target which programs, or types of programs, will be subject to APRs and EAPRs.
- OA and the SAAs can allocate technical assistance resources to programs, industries, or regions that need it the most. This includes the technical assistance that OA and the SAAs deliver directly as well as the technical assistance delivered by OA's Registered Apprenticeship Technical Assistance Centers and by other intermediaries.
- OA and the SAAs can award grants to promote effective DEIA practices or develop partnerships that will be necessary to anticipate trends revealed by the leading indicators.

Finally, OA must take leadership in establishing regular mechanisms to ensure implementation of changes resulting from the leading-indicator analysis. Ideally, these mechanisms should be institutionalized in OA's Annual Operating Plan and in OA staff's individual Annual Performance Plans.

5. Regulatory Changes Needed

Deployment of the Apprentice Survey would not require any changes to CFR title 29, but it would require development of a survey instrument and its approval by OMB (through filing of an Information Collection Request under the Paperwork Reduction Act).

In addition, the DEIA Subcommittee made a number of recommendations in the May Interim Report that would require regulatory changes, and the Subcommittee incorporates those here. These recommendations address: frequency of program reviews (p. II-9 of the Interim Report); stronger DEIA training (p. II-9); the definition of "apprenticeable occupation" (pp. II-9 – II-10); establishment of apprentice utilization goals for Federal construction sponsors (p. II-11); working with OSHA, establishment of standards for PPE that fits; clean, sex-separate or single-user bathrooms; and workplace violence (p. II-14).

Appendix I: Suggested Leading Indicators and Sources of Data for Each

Leading Indicator	Apprentice Survey	Internal Data	External Data
<i>All data to be analyzed by sex, race, ethnicity, disability status, occupation, and location.</i>			
Prevalence of discriminatory entry barriers to particular occupations, especially those that pay a family-sustaining wage	<p>Questions addressing tracking; recruitment, application and selection procedures; on-boarding experiences</p> <p>Questions about apprentices' reasons for not pursuing training for higher-wage occupations</p>	Equity Indices (calculated from RAPIDS data on active and completed apprentices in occupations that do pay a family-sustaining wage vs. those that do not)	<p>Comparisons to industry norms (e.g., Census Bureau data on % of workers from different demographic groups in apprenticeable occupations, showing changes over time)</p> <p>EEOC data on charges filed of hiring discrimination in comparable occupations</p>
Use of career ladders leading to occupations that pay a family-sustaining wage	<p>Questions about <i>opportunities</i> to pursue higher-level training (e.g., diploma or associate degree, etc.), including the marketing, promotion, and awareness of higher-level opportunities</p> <p>Questions about <i>barriers</i> preventing pursuit of a higher level of training (e.g., cost of tuition, books, supplies, transportation, childcare; wage or benefit loss while in class)</p> <p>Questions that identify effective strategies that increased the likelihood apprentices leveraged career ladders to pursued training for higher wage occupations.</p>	<p>Comparative USDOL RAPIDS analyses of active and completed apprentices in occupations that do pay a family-sustaining wage vs. those that do not</p> <p>Analysis of RAPIDS data on frequency of individuals completing successive apprenticeships in a career ladder (i.e., completers of one RAP who transition to higher level/longer RAPs)</p>	<p>Specific analyses for specific occupations where there is a range of training required and wages paid. E.g., in health care: Census Bureau data on % of LPNs or RNs from different demographic groups over time</p> <p>Other published relevant research. E.g., in health care, there is published research on rate of CNA/home health aides who progress up the career ladder to LPN or RN positions by race (Sick and Loprest, Employment and Earnings Outcomes by Length and Occupation of Healthcare Training (2021)).</p>

Leading Indicator	Apprentice Survey	Internal Data	External Data
	Questions about apprentices' reasons for not pursuing training for higher-wage occupations		Public data on amounts of Apprenticeship, WIOA, or sector-specific grant funds (such as Health Profession Opportunity Grants) available to assist apprentices to overcome financial barriers and progress up the career ladder
Barriers to apprentices advancing through, sticking with, and completing their programs*	<p>Questions about experiences with assessments for progression to the next levels of the RAP</p> <p>Questions about availability and use of wrap-around supports</p> <p>Questions about other barriers preventing completion of programs</p>	RAPIDS data on time to completion; retention rates	EEOC data on charges filed of promotion discrimination in comparable occupations
<i>*Note: the leading indicators on the prevalence of healthy, inclusive workplace cultures and of bullying, harassment, intimidation, and retaliation are also relevant to this leading indicator.</i>			
Prevalence of healthy, inclusive workplace cultures	<p>Questions about inclusiveness/exclusiveness of culture.</p> <p>SEE EXAMPLES IN APPENDIX II</p>	[not applicable]	[not applicable]
Prevalence of Bullying, Harassment, Intimidation, and Retaliation	<p>Questions addressing personal experiences and experiences witnessed.</p> <p>SEE EXAMPLES IN APPENDIX II</p>	Program review results: incidence of anti-harassment training	Published research on experiences of apprentices, workers in various occupations, or both (e.g., IWPR's 2021 survey of tradeswomen, A Future Worth Building: What Tradeswomen Say about

Leading Indicator	Apprentice Survey	Internal Data	External Data
			the Change they Need in the Construction Industry ; FMCSA Crime Prevention for Truckers Study (Nov. 2022)) EEOC data on charges of harassment and retaliation in comparable industries filed
Equity in number of work hours assigned	Questions about apprentices' experiences and assignments	Program review results: disparate assignments	Comparison of actual wages earned as reported to Wage & Hour (for Davis-Bacon-covered contractors) or other sources with RAPIDS data on race/sex/ethnicity/disability status EEOC data on charges filed of discrimination in work-hours assigned in comparable industries
Effectiveness of marketing and recruitment efforts	Questions about extent and sources of apprentices' information about apprenticeship – e.g., how did they find out about it and where did they get the information? Were current apprentices and journeyworkers included in the recruitment process to discuss their experiences? Did they reflect the demographics of the population being recruited?	Data on applicant flow gathered from program reviews (where available)	[not applicable]
DEIA Impact of Technical	[not applicable]	Program review results: % of programs reviewed that –	[not applicable]

Leading Indicator	Apprentice Survey	Internal Data	External Data
Assistance to RAPs		<ul style="list-style-type: none"> • provided the required anti-harassment training • notified all recruitment sources of all openings in their programs • prepared written Affirmative Action Plans (AAPs) (if required) • invited applicants and apprentices to voluntarily identify as a person with a disability (if required) • conducted targeted outreach and recruitment (if required) • conducted annual self-assessments of their personnel practices (if required) 	
DEIA Impact of OA's Grant-Making	[not applicable]	Equity Indices for apprentices in grant-funded programs compared with non-granted-funded programs	[not applicable]

Appendix II: Sample Questions

The following questions were suggested to assess the health and inclusiveness of RAP cultures:

- Do you feel like the Registered Apprenticeship program supports your ability to succeed and thrive?
- Do you feel safe and respected on the job site?
- If an issue arose on the job, would you feel comfortable raising it with your supervisor or other program representative?
- Does your program provide wrap-around services such as childcare and transportation?
- Does your program include training on anti-harassment and anti-discrimination?
- How often are you in touch with mentors?
- Do you have opportunities to engage in peer group discussions?
- Do you have opportunities to engage in discussions with senior leadership and union representatives?
- Is there an alumni program available to you once you complete the apprenticeship program?
- Are you aware of other apprenticeship opportunities to continue building your skills after you complete this program?
- How satisfied were you with your apprenticeship training program?

The following questions were suggested to help assess the prevalence of hostile-work-environment harassment:

- Unsolicited or unwelcome physical contact;
- Rude lewd or offensive jokes;
- Anything involving the “big five”;
 - Jokes about sexual orientation, gender, religion, age, or ethnicity;
- Negative or aggressive behavior towards a specific person or group;
- Belittling or threatening behavior;
- Witnessing behavior that makes you feel uncomfortable (if you feel uncomfortable, the targeted individual most likely does too);
- Micro-aggressions—more than just insults, these are insensitive comments or generalized jerky behavior, leaving their targets feeling uncomfortable or insulted;
- Outward manifestations of unconscious or implicit bias (a learned assumption or belief or attitude that exists in the subconscious);
- Witnessing quiet fear (which is when someone looks like they are terrified, or is looking down or looking around for help), as opposed to quiet strength (which is when someone looks straight back at the perpetrator and handles the situation).

Appendix III: The Good Jobs Initiative

Department of Commerce and Department of Labor Good Jobs Principles

[Download the Good Jobs Principles Fact Sheet](#) (PDF)

Good jobs are the foundation of an equitable economy that lifts up workers and families and makes businesses more competitive globally. They allow everyone to share in prosperity and support local communities and the entire U.S. economy. Workers know the value of a good job that provides stability and security for them and their families. All work is important and deserving of dignity. Many companies recognize that providing good quality jobs – that make them an employer of choice – creates a clear competitive advantage when it comes to recruitment, retention, and execution of a company's mission.

The Departments of Commerce and Labor have partnered to identify what comprises a good job. These eight principles create a framework for workers, businesses, labor unions, advocates, researchers, state and local governments, and federal agencies for a shared vision of job quality.

Recruitment and Hiring: Qualified applicants are actively recruited – especially those from underserved communities. Applicants are free from discrimination, including unequal treatment or application of selection criteria that are unrelated to job performance. Applicants are evaluated with relevant skills-based requirements. Unnecessary educational, credentials and experience requirements are minimized.

Benefits: Full-time and part-time workers are provided family-sustaining benefits that promote economic security and mobility. These include health insurance, a retirement plan, workers' compensation benefits, work-family benefits such as paid leave and caregiving supports, and others that may arise from engagement with workers. Workers are empowered and encouraged to use these benefits.

Diversity, Equity, Inclusion, and Accessibility (DEIA): All workers have equal opportunity. Workers are respected, empowered, and treated fairly. DEIA is a core value and practiced norm in the workplace. Individuals from underserved communities do not face systemic barriers in the workplace. Underserved communities are persons adversely affected by persistent poverty, discrimination, or inequality, including Black, Indigenous, people of color; LGBTQ+ individuals; women; immigrants; veterans; individuals with disabilities; individuals in rural communities; individuals without a college degree; individuals with or recovering from substance use disorder; and justice-involved individuals.

Empowerment and Representation: Workers can form and join unions. Workers can engage in protected, concerted activity without fear of retaliation. Workers contribute to decisions about their work, how it is performed, and organizational direction.

Job Security and Working Conditions: Workers have a safe, healthy, and accessible workplace, built on input from workers and their representatives. Workers have job security without arbitrary or discriminatory discipline or dismissal. They have adequate hours and predictable

schedules. The use of electronic monitoring, data, and algorithms is transparent, equitable, and carefully deployed with input from workers. Workers are free from harassment, discrimination, and retaliation at work. Workers are properly classified under applicable laws. Temporary or contractor labor solutions are minimized.

Organizational Culture: All workers belong, are valued, contribute meaningfully to the organization, and are engaged and respected especially by leadership.

Pay: All workers are paid a stable and predictable living wage before overtime, tips, and commissions. Workers' pay is fair, transparent, and equitable. Workers' wages increase with increased skills and experience.

Skills and Career Advancement: Workers have equitable opportunities and tools to progress to future good jobs within their organizations or outside them. Workers have transparent promotion or advancement opportunities. Workers have access to quality employer- or labor-management-provided training and education.

Appendix IV: DEIA Subcommittee Responses to Other Subcommittee Feedback on DEIA Issue Paper

1. Family-sustaining wages. *The DEIA Subcommittee's responses to the Pathways and IENES members' feedbacks on family-sustaining wages are provided separately.*
2. Business case for DEIA. *Following is the Pathways member(s)' feedback on adding information about the business case for DEIA and the DEIA Subcommittee's response to this feedback:*

Feedback: I would include existing research on the businesses that have deployed quality DEIA practices and the positive impact it has had on their bottom line. Having a diverse workforce IS good business – in connection with the section "Issue and Background" of the Issue Paper.

DEIA response: Agreed.

3. Data supporting prevalence of harassment and discrimination. *Following is the Pathways member(s)' feedback on data supporting prevalence of harassment and discrimination and the DEIA Subcommittee's response to this feedback:*

Feedback: While emotive the references to specific instance of harassment in Fresno and Chicago do not show the trend towards a lack of inclusivity and harassment. The data to prove this trend is likely available and should be used as well to prevent these statements from being dismissed as one-off or anecdotes.

DEIA response:

You are right, there is extensive survey data supporting the prevalence of sex harassment and discrimination, especially in male-dominated workplaces. We have added additional data to the DEIA Issue Paper and also here. *See, e.g.:*

- IWPR's survey of women in manufacturing jobs, [Advancing Women in Manufacturing: Perspectives from Women on the Shop Floor](#) (2023) (IWPR Women in Manufacturing Study) (detailing that 17% of women surveyed reported "sexual harassment occurring frequently or always," 18% of women of color surveyed reported "that racial harassment and discrimination occur frequently or always," and 10% of women surveyed reported "frequently or always being exposed to hostile and disparaging graffiti, including anti-Semitic or Islamophobic symbols" (p. 26); and finding that harassment and disrespect were the most common reasons for women wanting to leave their manufacturing jobs (p. 32)).
- IWPR's survey of tradeswomen, [A Future Worth Building: What Tradeswomen Say about the Change they Need in the Construction Industry](#) (2021) (IWPR Tradeswomen Survey) (56 percent of respondents report at some point notifying a supervisor or foreman, human resource manager or other company official, their business agent (senior union official), or

staff overseeing their apprenticeship program of harassment or other form of discrimination).

- EEOC, [Select Task Force on the Study of Harassment in the Workplace: Report of Co-chairs Chai R. Feldblum & Victoria A. Lipnic](#) (2016) (EEOC Harassment Study) (summarizing representative surveys of sex-related harassment and concluding that 40% of women had “experienced one or more specific sexually-based behaviors, such as unwanted sexual attention or sexual coercion”; 60% of women had experienced “gender harassment,” defined as “sexist or crude/offensive behavior” or “hostile behaviors that are devoid of sexual interest”; and 35% of lesbian-, gay-, or bisexual-identified respondents “who reported being ‘open’ at work” had experienced workplace harassment (pp. 8-10)).
- FMCSA [Crime Prevention for Truckers](#) survey in 2022 (FMCSA Study) (detailing that one-third of surveyed women truckers reported that in the previous 2 years they had experienced inappropriate touching (pp. 49-50) (though some women truckers criticize this as “a significant undercount,” [Harassment of Women Truckers Spurs Drivers, Agency to Seek Fixes, Bloomberg Law Daily Labor Report](#) (Dec. 12, 2022)); 38% that they were threatened verbally with physical harm; and 15% that they were hit, pushed, or physically hurt). Women were twice to four times more likely than nonminority men to be touched without permission; minority women were up to nine times more likely be physically harmed.
- Riddle, Kimberly Marie, "Risk Factors for Workplace Sexual Harassment in Female Truck Drivers" (2021) (Riddle study), Theses and Dissertations--Nursing 58, https://uknowledge.uky.edu/nursing_etds/58, at p. 157 (estimating that 60% of women have been sexually harassed).

Surveys also show that harassment and discrimination are substantially underreported:

- IWPR Tradeswomen Survey, p. 18 (finding that in the construction trades, only between 6 and 13 percent of harassment incidents are formally reported).
- EEOC Harassment Study (finding that “90% of individuals who say they have experienced harassment never take formal action against the harassment”) (p. 8).
- FMCSA Study at p. 50 (finding that respondents who had experienced harassment did not report it about half the time -- specifically, 42 percent of women, 57 percent of minority males, and 51 percent of nonminority males did not report).

The IWPR Women in Manufacturing Study also described its survey respondents’ experience with discrimination or unequal treatment in general, and reports that a substantial minority of them (between 30 and 41%) say that they are never or only sometimes treated equally with regard to safety, pay, access to overtime and good shifts, use of tools, lay-offs and OJL, and that a majority (between 51% and 56%) say they are never or only sometimes treated equally with

regard to work assignments, respect, promotion opportunities, and leadership development (p. 22, Figure 4).

Although there are fewer studies on the prevalence of harassment and discrimination based on characteristics other than sex (and none using a representative sample), 70% of the respondents to the most recent study of racial and ethnic harassment “reported experiencing some form of verbal harassment,” 45% “reported experiencing exclusionary behaviors,” and 69% “reported *witnessing* at least one ethnically-harassing behavior in the last two years.” EEOC Harassment Study, p. 12 (emphasis in original).

Two of these studies shed some light on women’s experiences in apprenticeships or other training programs in particular:

- The FMCSA Study found that “[h]arassment for women truckers often begins in driver training or in the motor carrier school they attend. Driver training is a vulnerable setting for women truckers as the majority of trainers are men, which presents the opportunity for the trainer to leverage his power or authority.” *Id.*, at p. 8 (citation omitted).
- The IWPR Women in Manufacturing Study oversampled women workers who have either completed or are pursuing apprenticeships (p. 55). It did not report any difference in the prevalence or kinds of harassment and discrimination experienced by women in apprenticeship programs.

From these, it is fair to conclude that the general findings of experienced by female apprentices experience the same (if not worse) frequency and kinds of harassment and discrimination that are generally true of women in similar workplaces.

The Subcommittee alluded to some of the above studies in the Appendix titled “Suggested Leading Indicators and Sources of Data for Each” to our Subcommittee’s Issue Paper. But the Subcommittee agrees that the incidents in Fresno and Chicago referred to in the main body of our Issue Paper do not alone “show the trend towards a lack of inclusivity and harassment.” To prevent these incidents “from being dismissed as one-off or anecdotes,” the Subcommittee will edit the paragraph beginning with “Apprenticeship has a strategic role to play in addressing economic inequality” to refer to the body of evidence establishing the prevalence and seriousness of harassment and discrimination in many apprenticeship settings.

4. *The way leading indicators will be used.* Following is the Pathways member(s)’ feedback on the use of leading indicators (2 comments) and the DEIA Subcommittee’s response to this feedback:

Feedback:

- The leading indicator survey could make employers nervous about retaliatory comments being used against them when they fire an apprentice with cause. It is important to clarify how these reports will be handled by USDOL and at what point an investigation might be

triggered. Provide the assurance that an investigation will only begin if a trend is spotted and not from one report.

- Provide a review process allowing for the employer to clarify their actions that have been called into question. The Subcommittee wants to assure employer USDOL wants them to be better and is willing to help them become better when they are failing.

DEIA response:

While the Subcommittee understands that there may be apprehension about deployment of a new information tool like the survey the Subcommittee proposes, the Subcommittee is confident that there is no reason for such apprehension.

First of all, not all apprentices and apprenticeship exiters will be surveyed – given the number of apprentices that would be impossible. Instead, as is done in virtually all professional surveys, a representative sample of apprentices and exiters will be surveyed. (The Subcommittee alluded to this in the Issue Paper, in our statement that “Sampling should be sufficient to produce representative data by underrepresented population, major occupation group, and State.”) So the likelihood that any particular fired apprentice would be surveyed would be rather small.

Moreover, as the Subcommittee emphasized in the Issue Paper, the survey would be anonymous, so even if an apprentice who was fired were to be surveyed, their identity would not be revealed to OA.

Furthermore, the Subcommittee assumed that the bulk of the survey would be questions the answers to which can be easily quantified (e.g., ratings on a 1-5 scale), so that answers are comparable and can be tabulated to identify trends. Again, this is the standard for professional surveys. There may be an opportunity at the end of the survey for the survey-taker to offer a comment, but such comments would not identify the employer or RAP sponsor in public reporting.

Most important, the survey is not intended to be used to identify specific employers or RAP sponsors that are not complying with the regulations. To the contrary, the purpose is to allow “the Registered Apprenticeship ecosystem—OA, the SAAs, and OA’s grantees and contractors—must use leading indicators to guide proactive, systematic monitoring and create an actionable feedback loop” (see the Issue Paper). In other words, aggregate survey data will be used to point to leading indicators. Nor will survey results be the sole measure of the indicators; the survey data will be considered along with internal data sources (including RAPIDS data) and external data sources to assess the indicators.

When leading indicators point to potential problem areas, OA and the SAAs can target their resources – the reviews they conduct, the technical assistance they (and intermediaries) provide, and the investments (grants) they make – to address the issue before it becomes a problem. The example given in the Issue Paper is illustrative. Should the leading indicator on Healthy Inclusive Cultures show that only 40% of apprentices in manufacturing are experiencing healthy cultures, OA could respond by targeting more resources to technical assistance to manufacturing RAPs.

Finally, whenever OA does program reviews, the process always includes numerous opportunities for the employer or RAP sponsor to clarify their actions. That starts with the very first component of a review, the desk review, during which the sponsor may provide additional information and documentation. During the second component, the in-person review, the registration agency staff member will “[m]eet with the sponsor’s designated representative to verify, clarify, and fill in any gaps in the information gathered during the desk review.” The in-depth review also “provides an opportunity for sponsors to ask questions and for the registration agency staff to provide technical assistance to help the sponsor comply” with the applicable requirements, [Apprenticeship Program Reviews Quick Reference Guide](#), pp. 4-5. These and other steps in the review process where there is an opportunity for input and technical assistance are laid out in materials on OA’s website, including the aforementioned [Apprenticeship Program Reviews Quick Reference Guide](#), and related webinar and PowerPoint presentations.

5. *Leading Indicator for effectiveness of marketing and recruitment efforts. Following is Pathways members’ feedback on the leading indicator for the effectiveness of marketing and recruitment efforts (see the Issue Paper) and the DEIA Subcommittee’s response to this feedback:*

Feedback: Split off “Effectiveness of marketing and recruitment efforts as calculated by historically untapped populations engaging in RA” and separate into a new bullet “Not only the allowability of wrap-around supports and services but the calculation of usage for each services carving out general workforce supports separate and apart from occupation-specific supports (e.g., communication skill building, daycare, OSHA certification)”

DEIA response:

The Subcommittee doesn’t understand what the Pathways member means and would appreciate clarification.

6. *Definition of “underserved communities” in Appendix III: The Good Jobs Initiative. Following is the Pathways member(s)’ feedback on the definition of “underserved communities” in Appendix III: The Good Jobs Initiative and the DEIA Subcommittee’s response to this feedback:*

Feedback: Add in please “mature adults who are recareering” as ageism and older workers are also part of this category -- in connection with the following definition of “underserved communities” in the Good Jobs Initiative paragraph on DEIA:

Underserved communities are persons adversely affected by persistent poverty, discrimination, or inequality, including BIPOC; LGBTQ+ individuals; women; immigrants; veterans; IWDs; individuals in rural communities; individuals without a college degree; individuals with or recovering from substance use disorder; and justice-involved individuals.

DEIA Response:

While the Subcommittee may agree with the member that older workers should be included in the definition of “underserved communities,” the entirety of Appendix III is *verbatim* from Commerce and USDOL [Good Jobs Principles Fact Sheet](#) and so cannot be changed.

Addendum E: Apprenticeship Pathways (Pre-Apprenticeship, Youth Apprenticeship, and Degree Apprenticeship) Subcommittee Year 2 Issue Brief

Subcommittee Members (by sector):

Employer	Labor	Public
Noel Ginsburg (delegate: Meaghan Sullivan)	Stephanie Harris-Kuiper	Todd Berch
David Long (delegate: Jared Karbowsky)	Bill Irwin	Walter Bumphus (delegate: Jen Worth)
Tim Oberg	Anton Ruesing	

OA Subcommittee Leads: Megan Baird, Dean Guido, and Lauren Smith

ACA Subcommittee Spokespersons: Stephanie Harris-Kuiper, Bill Irwin, and Anton Ruesing

ACA Members from Other Subcommittees: Stephanie Harris-Kuiper (DEIA) and Tim Oberg (Modernization)

Year 2 Issue – Youth Apprenticeship

Issue and Background:

Youth participation in Registered Apprenticeship programs has grown steadily over the last decade, delivering opportunities for young people to develop the skills needed to thrive in today's economy. Despite this growth, the youth segment of Registered Apprenticeship represents a small percentage of overall enrollment, leaving tremendous untapped talent potential. The underutilization of youth apprenticeship is a missed opportunity for employers to benefit from an important workforce development pipeline.

In the United States there is a common belief that the path to prosperity must include a 4-year college degree, yet only about one-third of people will obtain one. Most employers, when hiring, require a college credential for applicants to even make it into the pool of interviewed candidates. It is also common in our K-12 education system for teachers, counselors, and districts to be measured by the percentage of students who are college bound. This continues to create structural barriers for young people, particularly students of color, to progress in our economy.

Youth apprenticeship programs must be accessible to a diverse talent pool, providing more equitable access to a career skills training pipeline and to highly rewarding, in-demand, long-term careers. Recruitment of youth into these programs can be further targeted toward specific subgroups, such as women, POC, and veterans, providing an early access gateway that removes barriers to Registered Apprenticeship participation and success.

Youth apprenticeship has the potential to bring equal dignity and equal opportunity for youth in our country. Without building a bridge between high school and high-paying careers, which Registered Apprenticeship enables, we will continue to waste the most valuable resource our country has, its people. A young person can start with an apprenticeship and end with a PhD—it is truly an options multiplier!

The current Federal definition of registered youth apprenticeship includes all participants who are 16-24 years of age. Until recently the majority of youth apprenticeship programs served out-of-school youth, with most participants older than 20 years of age. Youth, especially minors under the age of 18, have unique programmatic needs regarding data privacy, effective recruiting processes, scheduling needs, and the types of support and flexibility they may require throughout the program. In addition, RAPIDS does not allow for the disaggregation of data to account for the positive impact apprenticeships are having for both the student and participating businesses for high school-connected youth.

Without a clear definition that includes a separate category for high school-connected youth, it will be difficult to scale what is a foundational strategy for expanding Registered Apprenticeship in the United States.

Strategic Importance of the Priority Issue:

Youth apprenticeship is, by definition, a Registered Apprenticeship program. It is identified for (in-school or out-of-school) youth because the delivery methods of the program are sensitive to the specific needs of youth. Formalizing business and education partnerships and youth apprenticeship strategies yields a competitive advantage for sponsors and apprentices by engaging youth early in career development planning. The benefit to employers is demonstrated in return on investments as well as in employee loyalty, retention, and advancement. Youth can experience a jump-start into a career field of choice in an apprenticeship program with linkages to high-quality, fulfilling, and safe jobs to support career goals. The intention of the following recommendations is to accelerate participation in youth apprenticeship and to remove unintended challenges to sponsors and apprenticeship partners across the nation.

Recommendations and/or Best Practices:

1. Overcoming bias toward college/classroom learning to the exclusion of work-based/experiential learning

There is a general belief in the United States that there is only one path to opportunity, namely a 4-year college degree. However, most people do not achieve a 4-year college degree, creating barriers of opportunity for the majority of our citizens and more specifically POC, women, and other marginalized communities. The Subcommittee supports post-secondary learning for all, to include apprenticeship and community college among a variety of options. School-based youth apprenticeship will bring equity and equal dignity to those taking advantage of the Registered Apprenticeship program. As a result, the Subcommittee recommends that USDOL in coordination with other Federal Government agencies (e.g., ED, Commerce) and intermediaries must develop strategies to award high school or college credit for students that participate in Registered Apprenticeship programs that have predefined

occupation specific competency assessments. These strategies would then be carried out by local school districts, employers, and other business and education stakeholders (e.g., Perkins councils). The Subcommittee also recommends that employers (including Federal and State governments) shift their hiring practices to recognize the value of skills and competencies attained through experiential learning in addition or as an alternative to classroom-based learning. These strategies would both increase DEIA in apprenticeship and the marketplace while improving other outcomes, such as achievement of portable degrees, licenses, and/or multiple credentials.

2. Youth apprenticeship is an options multiplier (e.g., Registered Apprenticeship completion, college, skilled work)

Comprehensive high schools, career technical education high schools, trade schools, and other secondary school providers can provide a tool for all types of learners that is proven to work: Registered Apprenticeship. Because schools in all States have different rules and regulations, youth apprenticeship can align itself to the academic standards required in the school and bring value to all learning styles.

Traditional and new and emerging occupations should be explored and career pathways need to be exposed to students. Cross-training, stackable certificates, and credit toward RA completion are just a few of the possible benefits.

A youth apprenticeship program must be both comprehensive and flexible to support learning that leads to a career for all participants. Credentials, on-the-job training (OJT), related training, and assessments will depend upon the career path.

Additional supports may be needed for youth-serving programs seeking registration. Removing barriers to registration will help improve programs' access to the apprenticeship system while maintaining quality.

3. Special considerations for youth participants in apprenticeship (e.g., supportive services)

Youth apprenticeship is unique because youth growth and development require consistent and reliable support and services from a variety of sources. These touchpoints provide more comprehensive attention to the individual needs of the youth. Collaborating closely with families and educators in youth apprenticeship is an essential element of apprentice success. Youth apprenticeship offers several models for both in-school youth (ages 16-21) and out-of-school youth (ages 16-24) and leverages the career development efforts of parents/guardians, administrators, teachers, and counselors who facilitate career planning and teach foundational competencies in personal effectiveness, academic achievement, and workplace preparation. See Appendix A for a table outlining some of the many special considerations that must be addressed for youth participants in apprenticeship.

4. Retool data and reporting to provide a fuller/more accurate picture of youth apprenticeship

To effectively support youth apprenticeship sponsors and participants, one must be able to collect, analyze, and report data effectively. Practicing good data principles such as ensuring validity, reliability, and credibility of data will provide the information necessary for all youth apprenticeship stakeholders to make well-informed decisions. Sponsors will have information needed to register, develop, monitor, and evaluate programs; educators will have information needed to provide effective instruction and to youth apprentices and connect them with supportive services; and parents or guardians of minors will have information needed to approve their participation in youth apprenticeship programs. Additionally, with good data, OA can make strategic decisions about promotion, policy, funding, resources, and innovation to advance the development of youth apprenticeship programs, including in a variety of new and emerging industries. In this context, the Subcommittee recommends the following points for consideration.

Currently, there are a number of issues related to data collection from the existing electronic platforms that affect the ability to effectively mine data for analysis. This is primarily as a result of the limitations in data collection about youth in RAPIDS 2.0 and reports that draw information from RAPIDS 2.0:

- Youth apprentices are not currently identified by name and birthdate other than upon registration. There is no report that allows for the collection of data about individual apprentices without accessing individual apprentice records. This is problematic as it is difficult to track youth apprentices who may need additional support and services as a result of their age. This is also a bit problematic for safety reasons as youth may fall under State child labor laws.
- Youth apprentices cannot be identified as an in-school or out-of-school participant. Again, this does not allow for effective study of the overall impact of apprenticeship on each population of apprentices. Differentiation of these populations would support development of programmatic strategies and best practices targeted to each population.
- Youth apprentices are not identified in a way that allows for the study of outcomes by race, gender, ethnicity, disability, or other identifying demographics. This omission can lead to misunderstanding about specific youth populations in the apprenticeship system. Further, it may be a missed opportunity to address specific topics with youth as they transition from the school environment to work cultures.
- Current data preclude gaining a better understanding of wages/wage progression for youth apprentices.

For these reasons, the Subcommittee recommends the ability to disaggregate youth apprentices (both in-school and out-of-school) from the general population of apprentices in reports. Having youth apprentice data stratified by age and school status would enable greater understanding of, for example, how well youth apprenticeship programs are meeting goals for DEIA; whether school-based programs perform similarly on those and additional metrics as other youth-serving programs; and where to target improvements to drive progress (e.g., outreach and recruitment).

Additionally, within youth-specific performance data there needs to be a success metric that takes into account not only topline numbers of exiters and completers, but also how many apprentices exited

during their probationary period. By reporting that number, programs that can be scaled can be better identified versus those that may have successful outcome metrics but poor retention rates from probationary to apprentice status. "Service" of a student has been broadly defined to date. This would tighten up the intent from counting touchpoints to quality outcomes.

Further, the expectations on parties inputting data, such as industry, educational institutions, intermediaries, and grantees, are extensive. The Subcommittee recommends OA make investments in policy or programmatic efforts to automate the collection of wage data for Registered Apprenticeship partners, thereby relieving education/training providers, intermediaries, grantees, and others from having to manually track and enter information, which leaves the potential for gaps in the data.

Lastly, there is much duplication of data entry for partners who receive funding through OA. The Subcommittee recommends OA invest in and coordinate efforts to align systems, align reporting requirements across multiple systems, or both.

5. Clearer definition of youth apprenticeship will help support its expansion by clarifying requirements

To support Registered Apprenticeship expansion, the Subcommittee recommends USDOL provide definitions for both youth apprenticeship programs generally and school-based youth apprenticeship programs specifically as follows.

Youth apprenticeship program means an apprenticeship program registered with USDOL or an authorized SAA that:

- (1) Fulfills all existing Registered Apprenticeship requirements;
- (2) Serves youth age 16-21 at the time of enrollment;
- (3) Requires high school graduation or equivalency as a requirement for apprenticeship completion;
- (4) May include pre-apprenticeship activities incorporated into the registered program for the first 2,000 OJT hours or 25% of OJT hours, whichever is less, to meet the unique onboarding needs of youth; and
- (5) May offer a part-time rather than full-time work schedule.

School-based youth apprenticeship program means an apprenticeship program registered with USDOL or an authorized SAA that:

- (1) Fulfills all existing Registered Apprenticeship requirements;
- (2) Serves in-school youth age 16-21 at the time of program enrollment who have not yet received a high school diploma or equivalent and are attending secondary school, including alternative school;
- (3) Requires high school graduation or equivalency as a requirement for apprenticeship completion;
- (4) In partnership with the school, issues academic credit toward the high school diploma for documented OJT work hours;
- (5) May include pre-apprenticeship activities incorporated into the registered program for the first 2,000 OJT hours or 25% of OJT hours, whichever is less, to meet the unique onboarding needs of youth; and

(6) May offer a part-time rather than full-time work schedule.

With the clarity provided by these definitions, not only schools but also CBOs, apprenticeship intermediaries, and other apprenticeship stakeholders can better serve as conduits to expanding youth apprenticeship and maximizing diversity efforts. For example, putting into regulations a requirement of high school graduation or equivalency for completion of youth apprenticeship programs will promote cooperation between staff at schools and programs to ensure youth are on track to receive those credentials.

6. Recognition of USDOL as an accrediting agency would save apprenticeship programs time and money

USDOL's OA should be recognized by ED as an accrediting agency under 34 CFR parts 602 and 603, for the purpose of accrediting Registered Apprenticeship programs. This recognition also should pass to SAAs recognized by USDOL under 29 CFR 29.13. USDOL meets the recognition criteria laid out in the Federal Regulations for Institutional Eligibility and the Administration of Title IV Programs. USDOL requires that OA or the SAA evaluate that programs have clear and effective accreditation standards (29 CFR 29.3(a)) and effective mechanisms for ensuring institutional and program quality (29 CFR 29.3(g) and (h) and 29.6(b) and (c)). These same regulations lay out the evaluation procedures used by OA and SAAs to review and accredit institutions and programs under the requirements of 29 CFR 29.4 and 29.5. While SAAs could be recognized by ED directly, USDOL already performs this function under 29 CFR 29.13, ensuring the same criteria are met, including adequate resources to carry out accreditation activities (29 CFR 29.13(b)(2)). Apprenticeships are a means of education and training that offer an alternative, but equally valuable pathway to a career as a traditional college education, and as such it is crucial to support and invest in these programs. The accreditation process can be time-consuming and expensive, but it can provide valuable benefits, such as access to Federal financial aid, increased credibility and recognition, and the ability to attract students who are looking for a formal degree or credential but do not want to follow the traditional educational pathway. Apprenticeship programs already demonstrate to USDOL that they meet the same accreditation criteria, and duplicating the evaluation process through other accreditation bodies requires an expenditure of resources that could be put to better use educating apprentices. By recognizing USDOL as an accrediting agency, we can help ensure that apprenticeship programs receive the recognition and resources necessary to provide individuals with the skills and knowledge needed for successful careers without creating duplicative processes.

Relevant definitions under 34 CFR 602.3 are as follows:

Accreditation means the status of public recognition that an accrediting agency grants to an educational institution or program that meets the agency's standards and requirements.

Accrediting agency or agency means a legal entity, or that part of a legal entity, that conducts accrediting activities through voluntary, non-Federal peer review and makes decisions concerning the accreditation or preaccreditation status of institutions, programs, or both.

The most commonly recognized use of the Federal financial aid system has been for attendance at an accredited post-secondary institution such as a trade school, community college, college, or university. It is possible that only apprentices attending accredited institutions can use the Federal financial aid system. A second recommendation related to accreditation is to explore and definitively determine the eligibility of Registered Apprenticeship program apprentices to access Federal financial aid for programs with internal supplemental instruction.

Formalizing a system for cross-transfer from professional work/life experience to college and university systems remains inconsistent in institutions of higher education across the nation. A third recommendation by this group is to establish a USDOL/ED team to explore the idea of formal recognition of professional experience, especially Registered Apprenticeship certificates of completion.

7. Miscellaneous recommendations

- Create additional requirements and/or exceptions of existing requirements for apprenticeship taking place in high school while making sure to provide a distinction between pre-apprenticeship and Registered Apprenticeship. High school students may need additional supervision, protections, and time flexibility for completion.
 - Create an exception to allow (or clarify that existing regulations allow) OJTs to be earned in a lab if overseen by an educator with competencies in the associated field.
 - Clarify that OJTs can be earned after completion of educational hours.
 - Allow for the transfer of accumulated OJTs between occupations if the OJTs were substantially similar.
 - Classes must maintain instructor to student ratios that are both safe and conducive to learning.
 - Encourage OJL received during a Registered Apprenticeship to be included on a high school transcript as an additional reflection (beyond any credentials earned) of competencies achieved.
- USDOL or State-recognized agencies must provide financial support directly to apprentices that will help apprentices purchase equipment and tools necessary for their careers.
- USDOL needs to encourage schools to use pre-apprenticeship programs where Registered Apprenticeship programs are not feasible but are willing to partner with the schools.
- USDOL must invest more in CBOs, apprenticeship intermediaries, and other apprenticeship stakeholders focused on youth apprenticeship for the purposes of broadening their reach to potential participants (both in school and out of school, with an emphasis on nontraditional populations) and articulating the benefits of youth participation in Registered Apprenticeship (e.g., early start to career development).

Appendix A: Special Considerations for Youth Participants in Apprenticeship

	In-school youth	Out-of-school youth
Directly involving apprenticeship	<ul style="list-style-type: none"> i. Transportation from school to apprenticeship site and potential employment site for OJL. Additional transportation may need to be considered if the participant needs transportation to return home that a traditional school system cannot provide. ii. Flexibility in core curriculum. Apprenticeship program works with the school to allow for participant to travel/partake in activities. iii. Ability to have online learning for both school-based learning and apprenticeship learning when deemed appropriate (e.g., flexible in scheduling of classes). Consideration of access to internet outside of school and devices to use. iv. Direct mentorship of the youth participant. Because the participant is both achieving a secondary (or in some cases post-secondary) degree and apprenticeship, there needs to be a counselor or mentor with direct supervision of the dual track to ensure that requirements for both are being met. v. Cross-bleeding of curriculum. If an apprenticeship program has cross-over with secondary or post-secondary degrees, then coordination with both curricula to allow for the transferability of credits to both should be encouraged. vi. Students with disabilities. Consideration of the student's physical and/or mental disabilities that affect their ability to enter/keep up with both 	<ul style="list-style-type: none"> i. Transportation. Without the potential help from the school system to provide cost-free transportation, consideration of how the participant can travel to the apprenticeship needs to be considered. While public transportation is an option, it does not provide access to all participants and varies in service. Potential stipends for public transportation, mileage reimbursement, or other needs may need to be considered. ii. Internet access. Internet access can provide a pathway for participants to learn remotely to provide flexibility. However, some participants may not have access to affordable internet or have the equipment available. Consideration of stipends for internet and loaning of equipment should be considered. iii. Participants in other jobs. Participants could already be working to provide for themselves or others. The participant may not be able to sacrifice reduced hours in order to participate in the program. While the participant may be able to obtain wages, it may not be enough or equal to their current employment. Programs must consider their wage scales and possibly provide stipends to the participant for such a period to allow for a smooth transition. It should be noted that it must not be a supplement to the wages of the participant,

	In-school youth	Out-of-school youth
	<p>school-based learning and participation in the apprenticeship program.</p> <p>vii. Costs of program. Consideration of what costs of the apprenticeship program (e.g., books, materials, entry fees, cost of program) should be assumed by USDOL and school system in order to provide minimal to no cost to the participant.</p> <p>viii. Child labor laws. Some governments have different restrictions, regulations, and statutes on child labor (e.g., Federal vs. local) that may affect the participation of youth. Programs should work in consultation with officials to ensure that they are able to provide programming to youth while abiding by these laws.</p> <p>ix. Drug and alcohol use. With multiple States having legalized marijuana and other drugs, how will that affect the ability of youth to partake in use while going through an apprenticeship program. Marijuana is still considered a "Schedule 1" narcotic, which limits the ability to do that. Additionally, issues with expanding apprenticeships into the marijuana industry potentially could arise due to this complication.</p>	<p>but only a bridge gap until the progressive wage scale during the course of the program exceeds the previous employment.</p> <p>iv. Childcare. Childcare needs to be considered and provided for (either directly or indirectly through stipends) to allow the participant to go the apprenticeship.</p> <p>v. Costs of program (see in-school youth column).</p> <p>vi. Participants with disabilities (see in-school youth column).</p> <p>vii. Mentorship/mental health (see in-school youth column).</p> <p>viii. Child labor laws (see in-school youth column).</p> <p>ix. Language barriers (see in-school youth column).</p>
Indirectly affecting apprenticeship	<p>i. Nutrition. Some students are on free/reduced meals at school and that could potentially be the only source of healthy nutrition the student receives. Consideration of how the program and employer could supplement these needs would be crucial to the well-being of the student within</p>	<p>i. Nutrition. There needs be consideration of nutrition of the participant so that the participant can fully participate.</p> <p>ii. Mentorship/mental health (see in-school youth column).</p> <p>iii. Drug and alcohol use (see in-school youth column).</p>

	In-school youth	Out-of-school youth
	<p>the school/apprenticeship and during their overall development.</p> <p>ii. Mentorship/mental health. Due to the high level of stress/workload the participant will endure, special consideration (as noted above) needs to be emphasized. Additional consideration should be given for those participants who may have unique situations, such as but not limited to: single-parent households, divorced parents, foster children, prior involvement with juvenile system, previous mental health considerations.</p> <p>iii. Language barriers. The first issue is certain apprenticeship programs require some form of English literacy to enter and participate in the apprenticeship program. Providing courses that would allow for learning would be beneficial. Additionally, many participants may be proficient in a language other than English. It must be considered how many alternative languages the apprenticeship should be equipped for and if USDOL should help bear the costs associated with that.</p> <p>iv. Medical/privacy information. With the apprenticeship program being an overseer of the participant, they would need to be privy to critical medical information (e.g., diabetes, allergies, medications, epilepsy). Additionally, certain medical information may need to be shared with the apprenticeship program to ensure the safety of the participant, programs, and others. Lastly,</p>	<p>iv. Medical/privacy information (see in-school youth column).</p> <p>v. Housing (see in-school youth column).</p>

	In-school youth	Out-of-school youth
	<p>information needs be shared with the guardian of the participant if they are a minor.</p> <p>v. Housing. If the participant is homeless, this would present a barrier for the student and requires that efforts be made to identify those participants.</p>	

Addendum F: Industry Engagement in New and Emerging Sectors Subcommittee Year 2 Issue Brief

Subcommittee Members (by sector):

Employer	Labor	Public
Amy Kardel	Daniel Bustillo	Orrian Willis
Carolyn Holmes Lee Delegate: Pooja Tripathi	John Costa 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 Apprenticeship 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 will 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 POC, 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*
 - The Department has to employ recruitment and outreach strategies that ensure that it is effectively targeting workers in new and emerging sectors and reaching the historically marginalized populations it hopes to engage (e.g., advertise in the right places and to the right communities).
- *Recommendations for USDOL investment*
 - USDOL must 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.
 - USDOL must invest in marketing needed for the apprenticeship system and make clear to targeted communities how individuals can achieve upward economic mobility. USDOL also needs to invest in marketing to employers, to make the case that by participating in Registered Apprenticeship there is a ROI for employers in engaging historically marginalized populations and making career pathways available, especially in new and emerging sectors.
 - OA must create a map of occupations within a given sector and identify worker pathways from one sector to another. The map needs to show how an individual can increase their wages along a pathway either within an industry or between industries.
 - OA must consider investing in the development of an Apprenticeship Pathways Framework Tool to support workers and their economic growth and mobility. USDOL 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 POC 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, the Subcommittee 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 QF
 - As a supplement to the Apprenticeship Pathways Tool, USDOL should investigate the potential of creating a U.S. National QF.
 - USDOL 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 QF. 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.

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	Associate Teacher: 18-24 months	Associate Teacher - median annual salary: \$29,000	Associate Teacher Permit	Apprentices start in an Associate Teacher Apprenticeship, earning 12 college credits, 2,000 hours of OJT, and becoming qualified for positions as Teacher's Aide or Assistant.
	OR Home Visitor	ECE Teacher: 2-3 years	ECE Teachers - median annual salary: \$32,000	Teacher Permit + AA degree	They are then eligible to advance into the Teacher Apprenticeship, earning AA (Associate in Arts) degrees and 2,000 hours of OJT training.
	OR Expanded Learning Program Leader OR PreK-3 Paraprofessional	ECE Lead Teacher: 2-3 years	ECE Lead Teachers - median annual salary: \$58,000	Master Teacher Permit + Site Supervisor Permit + BA degree	Then they can choose between four advanced apprenticeships (Lead Teacher, Home Visitor, Expanded Learning Program Leader, or PreK-3 Paraprofessional), earning BA (Bachelor of Arts) degrees and requisite professional credentials.
IT/Cyber	IT Generalist to Information Security Analyst	First program is 12 months. Second program is 18 months.	IT Generalist Journey Level Wage \$30/hour Information Security Analyst Journey Level Wage - \$42/hour	CompTIA and other Industry-Recognized Credentials	The IT Generalist Registered Apprenticeship 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 Information Security Apprenticeships. The Information Security Apprenticeship moves a worker from Intro IT skills to being a fully proficient entry-level Security Analyst.

EXAMPLES OF INDUSTRY-SPECIFIC EXISTING APPRENTICESHIP PATHWAYS					
Industry	Occupations & Pathways	Duration	Wages	Credentials Earned	Brief Description
Transportation	Operator to Mechanic		Operator: \$25-\$44/hour 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>

Addendum G: Apprenticeship Modernization Subcommittee Year 2 Issue Briefs

Year 2 Issue – Quality Standards

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

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, IWDs, and the AANHPI communities who are underrepresented in today’s Registered Apprenticeship system, and to be more inclusive of Black and Hispanic apprentices who are underrepresented in higher paying occupations.

Existing guidance from 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. OA and SAAs 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 that 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 must continue, and as a condition for further funding, the programs must be given incentives by the Federal Government to meet defined quality standards. OA should issue a TEN or other policy defining Quality Guidelines for RAPs that will be higher than merely complying with 29 CFR 29.29 and 29.30. OA and SAAs, 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 or tax credits or both. 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 (Notice of Funding Opportunity) 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
 - Completion results in an industry-recognized credential in an in-demand occupation that is transferable across multiple employers.
 - OA must reinstate the national completion averages for occupations. This needs to be calculated yearly AND calculated retroactively back to 2010 to create an immediate completion baseline.

- OA, in consultation with the SAAs, should include variables for occupations impacted by events such as weather and technology. (Example: roofers and bricklayers.)
 - Industry-recognized interim and stackable credentials provided.
 - Licenses should be factored in where applicable.
 - Certifications should be factored in where applicable.
 - Programs with high completion percentages in which the journey-level wages are family-sustaining wages with benefits, allowing one adult to support two children, according to the [MIT living wage calculator](#).
 - OA and the SAAs 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.
 - OA and the SAAs 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.
 - The program graduates at a minimum of 75% all apprentices once the probation period is completed.
2. Transparency for apprentices
- 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 either TA or deregistration. Programs are encouraged to provide each apprentice with a 1-page fact sheet to help ensure the apprentice understands the:
 - Defined length of time of program and the skills, knowledge and abilities needed to advance and graduate.
 - Clear and standardized wage progression.
 - Expectations of all aspects of the program
3. Diversity of participants
- Programs demonstrate that their current apprentices reflect the racial, ethnic and gender diversity of their communities.
 - If a program does demonstrate this diversity, it can show year-over-year progress towards racial, ethnic, and gender diversity goals.
 - Graduation rates are not differentiated by race, ethnicity and gender.
4. Worker voice
- Workers (apprentices and journeypersons) have opportunities to voice workers'

(nonmanagement 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.

- A process is in place for an apprentice to appeal any decisions regarding their participation in the program.

5. Ratios

- A ratio in hazardous occupations should be maintained at a minimum of one apprentice to one journeyworker, at minimum, to ensure the safety of the apprentice, journeyworker and public as outlined in OA Circular 2021-02.³³
- A ratio in nonhazardous occupations needs to 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.
- Deviations for the above must be consistent with OA Circular 2021-02 or individual SAA/State guidance or both.

6. Sector-based strategies

- 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.
- Sector-based strategies reflect the interests of a range of stakeholders, including industry groups, unions, CBOs, and other government agencies.

7. Compliance:

- Programs that do not meet the minimum requirements during the Compliance/Quality Review process need to have that designation noted on a Quality Seal RAP created by OA and maintained on their site.

³³ USDOL, OA Circular 2021-02, "Guidelines for Reviewing Apprentice to Journeyworker Ratio Requests," Jan. 12, 2021, <https://www.apprenticeship.gov/about-us/legislation-regulations-guidance/circulars>.

Year 2 Issue – Marketing Apprenticeship

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: Tim Oberg and Michael Oathout

ACA Subcommittee Spokespersons: Erin Johansson

ACA Members from Other Subcommittees: N/A

Issue and Background:

There is a consensus that apprenticeship is not being touted enough for the successes that it is bringing. A recent Harvard report states that “apprenticeships have failed to take hold in the United States, accounting for just 0.3% of the labor force.” ([Roden, Dec. 2022](#)) This is also seen by many as a constant battle to remind people that apprenticeship is equal to, if not better than, a college degree. Marketing of apprenticeship has largely been left up to individual Registered Apprenticeship programs (RAPs) with some support from USDOL. This has led to multiple messages that seem contradictory about apprenticeship because each message is about a specific apprenticeship program. These messages were also large driven by word of mouth, which often fails to take hold in communities that are unfamiliar with the individual sharing the message. This is especially true of nonwhite communities, communities of IWDs, and women. Across all the current ACA’s subcommittees, there has been request for OA and USDOL to take a more active role in supporting outreach and marketing/advertising efforts.

Strategic Importance of the Priority Issue:

OA and USDOL taking a leading role in advertising of apprenticeship will support clear messaging that has a greater reach. A clear message, in conjunction with clear guidelines, will encourage more stakeholders – employers, schools, union programs, and others – to engage in RAPs. Increased awareness of Registered Apprenticeship across all demographic groups is crucial to increase DEIA within apprenticeships and participation in Registered Apprenticeship overall.

Recommendations and/or Best Practices:

To effectively market apprenticeship, the Subcommittee suggests that OA and USDOL take these steps:

- Use social media, billboards, radio, and more to raise awareness of apprenticeship.
- Make use of multiple markets to beta test effective advertising prior to using it nationwide.
- Promote one website – Apprenticeship.gov – rather than multiple websites
- Communicate what is available on apprenticeship.gov more effectively to RAPs, job seekers, and potential Registered Apprenticeship sponsors.
- Database of employers – update apprenticeship.gov job finder, communicate to RAPs and employers how to be added to it via video and webinars.
- Implement a chatbot or live chat options on apprenticeship.gov
- Use the above chat feature to help guide job seekers to specific apprenticeships based on their interest.
- Design a section on apprenticeship.gov for sponsors on how and why to create an apprenticeship. Include direction, training and contacts that will provide them the support needed to set up new RAPs.
- Hire additional personnel to assist new employers with creating RAPs.
- Utilize advertising firms to raise awareness of apprenticeship and apprenticeship.gov.
- Provide advertising materials in multiple languages in markets that have apprenticeship that can serve those languages.

The Subcommittee also suggests that individual RAP's assist USDOL expansion efforts, and themselves, take these steps:

- Offer job placement assistance to community organization, colleges, and high schools.
- Take part in local service projects and hiring events.
- Encourage existing apprentices to share their experience at community events. Using local voices is especially effective in communities of color.
- Create in-school youth apprenticeship programs or pre-apprenticeship programs.
- Attend college fairs as well as trade fairs at community centers and high schools.
- Partner with WIOA and local Workforce Development Agencies.

The Subcommittee also offers the following themes that could be useful in marketing efforts – such efforts need to be targeted with specific messages based on the audience. Keep in mind that one size does not fit all, and these messages will be used for specific audiences and in specific markets.

- Messaging for prospective apprentices and their parents
 - Apprenticeship can help job seekers find a living wage without going into debt.
 - Apprenticeship is for everyone.
 - Apprenticeship is an earn while you learn model and can help you graduate debt free.

- Apprenticeships can provide college credit as well as financial security and professional skills.
- Apprenticeship lets you start working now in the career you want.
- Apprenticeship can make college affordable.
- Youth and adult apprenticeship has the potential to make college more affordable as many employers provide tuition reimbursement as a benefit making college more affordable.
- Messaging for Employers
 - Apprenticeship can help employers build a broader, wider, and more diverse pipeline of workers for their company giving them access to more talent.
 - Apprenticeship provides wage expectations and clarity for new workers, leading to better retention.
 - Apprenticeship has substantial return on investment, and increases retention.
 - Apprenticeship provides you with better trained employees giving you an advantage over your competitors both domestic and globally.
- Messaging for School Counselors
 - The success rate of apprenticeship programs is over 70%. Far better than that of 4-year universities.
 - Apprenticeship programs started in high school have led to higher graduation rates for the participants.
 - Apprenticeship can lead to gainful employment and opportunities for those who have been most marginalized.
 - Apprenticeship shows the importance of school by allowing students to see what the real world is like.
 - Apprenticeship can be a pathway too college.
 - Youth and adult apprenticeship has the potential to make college more affordable as many employers provide tuition reimbursement as a benefit, making college more affordable.

Regulatory Changes Needed (*Optional*)

Update and market the existing [Employer's Playbook for Building an Apprenticeship Program](#), Be sure to allow for all required form to be completed 100% digitally. Ensure all of these forms can be accessed from a single web page.

Year 2 Issue – Onboarding New Programs

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: Obed Louissaint and Marty Riesberg

ACA Subcommittee Spokespersons: Erin Johansson

ACA Members from Other Subcommittees: N/A

Issue and Background:

The Registered Apprenticeship system provides a good model to build the skills for a number of new and emerging capabilities that are required for the country's ongoing competitiveness. As the economy and the jobs available to the American workforce continue to evolve, the options for workers' acquisition of skills, the relevance of skills, and the skills that employers are looking for in their workforce are changing as well. As this issue persists, the combination of learning institutions, government, industry and the worker need to lean into models of continuous learning and workplace development in order to keep pace with skills needs as well as enable citizens to get and stay on a path to family-sustaining wages. While the Registered Apprenticeship model is a tried-and-true method for developing a skilled workforce, the entry point to modern Apprenticeship needs to be improved to ensure rapid adoption and scaling of the model.

Strategic Importance of the Priority Issue:

Skills shortages for key skills continues to threaten Gross Domestic Product and the long-term competitiveness of the country. In the absence of skill-based training and credentialing, employers continue to leverage candidates with academic degrees. The attainment of academic degrees from institutions of higher learning are thus a barrier to entry to critical family-sustaining roles, excluding 62%³⁴ of the U.S. workforce from accessing such roles, with disparate impacts for underrepresented populations.

³⁴ Katherine Schaeffer, "10 facts about today's college graduates," Apr. 12, 2022, <https://www.pewresearch.org/fact-tank/2022/04/12/10-facts-about-todays-college-graduates/>.

Apprenticeship provides a valid alternative and opens the aperture of talent to be considered and developed into key careers. Creating a pathway to easily develop new apprenticeship programs, in both existing and new and emerging sectors, would result in better outcomes for workers, employers, and the economy.

Recommendations and/or Best Practices:

The Modernization subcommittee submits the following recommendations to streamline the onboarding of new apprenticeship programs.

- 1) Digitize and modernize the onboarding process
 - a. Develop apprenticeship.gov resources to comprehensively explain the program onboarding process. Ensure these resources are accessible and easy to find through marketing or promotional campaigns, guidance to industry, or other system-wide communications.
 - b. Offer an option to digitize form 671 and provide employers with options to enter required information in an online system (this may result in a faster process for programs and may also help with the collection of data and information about programs).
 - c. Seek to improve and simplify the process for the submission of apprenticeship enrollment forms to ease administrative burdens on sponsors. Seek to establish partnerships with widely scaled systems (payroll systems, application tracking systems, customer relations management tools) to further introduce efficiencies for sponsors.
 - d. Remote check-ins – assess whether programs could check-in with apprentices remotely to streamline the monitoring process. This may not apply to all types of jobs, but for certain IT-based occupations, for example, oversight may be achievable in a fully digital/remote system.
- 2) Standardization and nationalizing the system
 - a. Take a close look at the occupational vetting process (apprenticeability) – this process needs to be streamlined for potential programs in emerging, critical sectors if possible, but also must consider impacts on existing programs (see *Modernization subcommittee's recommendations re: splintering in the ACA's Interim Report*). Employers, sponsors, and apprentices would benefit from a national system that does not vary by State – national employers, emerging industries seeking to establish apprenticeship programs to address skills needs, and apprentices would all benefit from the mobility of talent.
 - b. Availability of support personnel to provide guidance to prospective program sponsors, applying a standardized set of guidance to both existing and potential programs. Such personnel will advise existing and potential programs on the pathways available to them to create or advance apprenticeship programs.

- c. Leveraging hybrid models in existing and new apprenticeship programs to achieve quality and standardization across programs. Interim credentials demonstrating the attainment of key skills can be leveraged to confer portable, stackable credentials for apprentices, and may also be valuable for achieving flexibility in apprenticeship program design and moving apprentices through a program and into a career with family-sustaining wages.
 - i. In guidance or regulation, consider clarifying this language from OA Circular 2016-01 for program sponsors: “Maximum allowable credit for prior work experience is 50 percent of training.”³⁵ Programs would benefit from thoroughly understanding the options available in program design.
 - ii. Allow apprenticeships in new and emerging occupations (e.g., insurance, finance, banking, technology) to include training (RTI) and time spent in all aspects of the business prior to the apprentice choosing their final occupation in which they will receive their apprenticeship credential.

3) Insight from RAPIDS data

- a. Identify “success profiles” for emerging job roles – RAPIDS data should be leveraged to help stakeholders in all sectors understand what a successful apprenticeship program, apprentice outcome, and apprentice graduate integration into a long-term career path with family-sustaining wages looks like by job role.
- b. Take a close look at the processes around the collection of demographic data on apprentices and apprenticeship programs. OA needs to seek to leverage as much data as possible to ensure its investments and support systems are reaching targeted communities they are intended to support. Leveraging demographic data across similar apprenticeship programs operating in similar communities could help sponsors make decisions to improve their programs, outreach, and outcomes.

³⁵ USDOL, OA Circular 2016-01, “Guidelines for Competency-based, Hybrid and Time-based Apprenticeship Training Approaches,” Oct. 20, 2015, p. 5, <https://www.apprenticeship.gov/about-us/legislation-regulations-guidance/circulars>.

Addendum H: Advisory Committee on Apprenticeship Charter

U.S. Department of Labor Employment and Training Administration

Advisory Committee on Apprenticeship Charter

1. Official Designation

Advisory Committee on Apprenticeship (ACA or Committee)

2. Authority

The ACA is authorized by the National Apprenticeship Act (the Fitzgerald Act), 29 U.S.C. 50a, which permits the Secretary of Labor (Secretary) to appoint a national advisory committee to serve without compensation. The ACA is a discretionary Committee established by the Secretary in accordance with the provisions of the Federal Advisory Committee Act (FACA), as amended 5 U.S.C., App. 2, and its implementing regulations (41 CFR 101-6 and 102-3).

3. Objective and Scope of Activities

The objective and scope of the ACA is to provide advice and recommendations to the Secretary on ways to better utilize the apprenticeship training model in order to provide equitable career pathways that advance the dignity of work for everyone, emphasizing three strategic areas as follows.

- the expansion, modernization, and diversification of the National Apprenticeship model;
- the expansion of apprenticeships into new industries and sectors including, but not limited to, cybersecurity, clean energy, advanced manufacturing, information technology, and healthcare; and
- equitable access for all workers to participate and succeed in the National Apprenticeship system.

4. Description of Duties

- The ACA will achieve its objectives utilizing the following methods.
 - deliberating as a group to develop, refine, finalize, and propose recommendations to the Secretary;
 - reviewing and providing feedback on research, policies, best practices, and industry and employment trends that will impact the National Registered Apprenticeship system;
 - identifying and sharing best practices and models that will impact sustained employment for a variety of populations; and
 - consulting with experts and practitioners for information and expertise pertinent

to Committee duties and priorities as needed. Specifically, the ACA will consult with experts from industry, labor organizations, community organizations, State/Federal agencies, and others as appropriate. The ACA will consult specifically with industry and/or sector experts in the targeted areas for apprenticeship expansion.

- No later than six months from the date this charter is filed, the ACA will submit to the Secretary an interim report with its recommendations regarding:
 - the development and implementation of policies, legislation, and regulations affecting the National Registered Apprenticeship system;
 - strategies to expand apprenticeships into new industries and sectors including, but not limited to, cybersecurity, clean energy, advanced manufacturing, information technology, and healthcare;
 - the identification of partnerships that can help ensure equal access and expand participation of nontraditional or underrepresented apprenticeship populations and communities; and
 - the convention of sector leaders and experts to establish specific frameworks of industry-recognized occupational standards.
- No later than June 1 of every odd-numbered year, the ACA will submit to the Secretary a report with its recommendations regarding:
 - strategies to expand, modernize, and diversity the National Apprenticeship model;
 - how to streamline and increase flexibility to ensure the National Apprenticeship system can better meet current and future workforce needs; and
 - equal access for all workers to participate and succeed in the National Apprenticeship system.

5. Agency or Official to Whom the Committee Reports

The ACA reports to the Secretary.

6. Support

The Employment and Training Administration (ETA), Office of Apprenticeship (OA) is responsible for providing necessary support for the ACA.

7. Estimated Annual Operating Costs and Staff Years

The estimated annual operating costs are approximately \$245,000, including 1.6 staff years.

8. Designated Federal Officer

The OA Administrator, a permanent employee appointed in accordance with agency procedures, will serve as the Designated Federal Officer (DFO). The DFO will approve and prepare all meeting

agendas, call all Committee and subcommittee meetings, adjourn any meeting when the DFO determines adjournment to be in the public interest, and chair meetings when directed to do so by the Secretary. The DFO or the DFO's designee will be present at all Committee and subcommittee meetings.

9. Estimated Number and Frequency of Meetings

The ACA will meet approximately two or three times annually.

10. Duration

The period of time necessary for the ACA to carry out its purpose is indefinite.

11. Termination

The Committee will terminate two years from the date the charter is filed unless the charter is renewed in accordance with Section 14 of FACA.

12. Membership and Designation

- **Representation.** The ACA will be composed of 27-30 voting representatives appointed by the Secretary. Committee membership will include a balanced representation of employers, labor organizations, active youth apprentices (ages 16-24) or individuals who have recently completed youth apprenticeship programs, and members of the public. The National Association of State and Territorial Apprenticeship Directors will be represented by its current President on the public group. The Secretary will appoint one of the public members as ACA Chairperson. The ACA members will elect two co-chairs—one from members representing employers and one from members representing labor organizations.

Representatives from the U.S. Departments of Commerce, Education, Energy, Health and Human Services, Housing and Urban Development, and Transportation will be invited to serve as non-voting, *ex officio* members. The Assistant Secretary of Labor for ETA will serve as a non-voting, *ex officio* member.

- **Member Terms.** Members will be appointed for terms of two or three years as designated by the Secretary. Appointments to vacancies occurring during the terms of such appointments will be for the unexpired portions of those terms.
- **Membership Requirements.** To the extent practicable, members will be appointed according to the terms of this section of the charter and the ACA membership balance plan. However, all Committee members will serve at the pleasure of the Secretary. Members may be appointed, reappointed, or replaced, and their terms may be extended, changed, or terminated as the Secretary sees fit.

Membership on the ACA will be fairly balanced. Members will come from a cross-section of those directly affected, interested, and qualified as appropriate to the nature and

functions of the ACA. The composition of the Committee will depend upon several factors, including: the Committee's mission; the geographic, ethnic, social, economic, or scientific impact of the advisory Committee's recommendations; the types of specific perspectives required, for example, those of consumers, technical experts, the public at-large, academia, business, or other sectors; the need to obtain divergent points of view on the issues before the Committee; and the relevance of State, local or tribal governments to the development of the Committee's recommendations. To the extent permitted by FACA and other laws, Committee membership should also be consistent with achieving the greatest impact, scope, and credibility among diverse stakeholders. The diversity in such membership includes, but is not limited to, race, gender, disability, sexual orientation, and gender identity.

13. Subcommittees

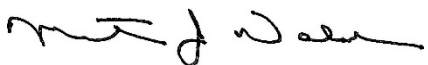
The DFO will have the authority to establish subcommittees as needed. Subcommittees must report back to the parent Committee, and must not provide advice or work products directly to any Federal agency official on behalf of the ACA.

14. Recordkeeping

The records of the ACA will be handled in accordance with the General Records Schedule 6.2, Federal Advisory Committee Records, and the approved records disposition schedule for ETA. These records will be available for public inspection and copying subject to the Freedom of Information Act, 5 U.S.C. 552.

15. Filing Date

This charter is filed on the date indicated below.



MARTIN J. WALSH
Secretary of Labor

May 19, 2021
Date