



Secretary’s Advisory Committee on Apprenticeship (ACA)

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

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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, people of color, 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 people of color, 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, we recommend that DOL 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 pre-defined 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). We also recommend 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., RA 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, 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, we recommend 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, we recommend 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 diversity, equity, inclusion, and accessibility; 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 should 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. We recommend OA make investments in policy or programmatic efforts to automate the collection of wage data for RA 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. We recommend 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 RA expansion, we recommend DOL 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 the U.S. Department of Labor or an authorized state apprenticeship agency 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 the U.S. Department of Labor or an authorized state apprenticeship agency 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 on-the-job training 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 community-based organizations, 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 DOL as an accrediting agency would save apprenticeship programs time and money

DOL’s Office of Apprenticeship 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

State Apprenticeship Agencies recognized by DOL under 29 CFR 29.13. DOL meets the recognition criteria laid out in the Federal Regulations for Institutional Eligibility and the Administration of Title IV Programs. DOL requires that OA or the State Apprenticeship Agency 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 State Apprenticeship Agencies to review and accredit institutions and programs under the requirements of 29 CFR 29.4 and 29.5. While State Apprenticeship Agencies could be recognized by ED directly, DOL 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 DOL 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 DOL 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 DOL/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 on-the-job training received during a registered apprenticeship to be included on a high school transcript as an additional reflection (beyond any credentials earned) of competencies achieved.
- DOL or State recognized agencies should provide financial support directly to apprentices that can help apprentices purchase equipment and tools necessary for their careers.
- DOL should encourage schools to use pre-apprenticeship programs where Registered Apprenticeship programs are not feasible but are willing to partner with the schools.
- DOL should invest more in community-based organizations, 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).
- 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 should be one that is updated annually for inflation, accounts for regional differences in cost of living, and is evidence-based.

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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 OTJ learning. 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 school-based learning and participation in the apprenticeship program. 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 DOL and school system in order to provide minimal to no cost to the participant. 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. 	<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 be already 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 should 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 should not be a supplement to the wages of the participant but only a bridge gap until the progressive wage scale during the course of the program exceeds the previous employment. iv. Childcare. Childcare should be considered and provided for (either directly or indirectly through stipends) to allow the participant to go the apprenticeship.

	In-school youth	Out-of-school youth
	<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>v. Costs of program (see in-school youth column). vi. Participants with disabilities (see in-school youth column). vii. Mentorship/mental health (see in-school youth column). viii. Child labor laws (see in-school youth column). 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 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 should be considered how many alternative languages the apprenticeship should be equipped for and if DOL 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>i. Nutrition. There needs be consideration of nutrition of the participant so that the participant can fully participate. ii. Mentorship/mental health (see in-school youth column). iii. Drug and alcohol use (see in-school youth column). iv. Medical/privacy information (see in-school youth column). 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 efforts should be made to identify those participants.</p>	

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