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| <b>EMPLOYMENT AND TRAINING ADMINISTRATION</b><br><b>ADVISORY SYSTEM</b><br><b>U.S. DEPARTMENT OF LABOR</b><br><b>Washington, D.C. 20210</b> | <b>CLASSIFICATION</b><br>Registered Apprenticeship |
|   | <b>CORRESPONDENCE SYMBOL</b><br>OA                 |
|   | <b>DATE</b><br>March 9, 2026                       |

**ADVISORY: OFFICE OF APPRENTICESHIP CIRCULAR NO. 2026-01**

**TO:** NATIONAL APPRENTICESHIP SYSTEM STAKEHOLDERS  
OFFICE OF APPRENTICESHIP STAFF  
STATE APPRENTICESHIP AGENCIES  
STATE CTE DIRECTORS  
STATE EDUCATION AGENCY HEADS  
STATE WORKFORCE AGENCY HEADS

**FROM:** MEGAN BAIRD  
Acting Administrator, Office of Apprenticeship

**SUBJECT:** Registered Apprenticeship Training Approaches

- Purpose.** To inform Office of Apprenticeship (OA) staff, State Apprenticeship Agencies (SAAs), Registered Apprenticeship program sponsors, and other Registered Apprenticeship stakeholders of the rescission and replacement of OA’s prior Circular entitled “Guidelines for Competency-based, Hybrid, and Time-Based Apprenticeship Training Approaches” (Circular 2016-01). This Circular clarifies the criteria for Registered Apprenticeship program design under the competency-based, hybrid, and time-based training approaches, and provides updated guidance on elements applicable to all training approaches, including the evaluation of apprentices’ performance, the provision of related instruction, the granting of advanced standing, and the issuance of a certificate of completion.
- Action Requested.** OA staff, SAAs, Registered Apprenticeship program sponsors, and Registered Apprenticeship stakeholders should review and adhere to the guidance in this Circular in developing, designing, registering, and conducting reviews of Registered Apprenticeship programs.
- Background.** On October 20, 2015, OA published Circular 2016-01 to establish guidelines for Registered Apprenticeship program design under the competency-based, hybrid, and time-based approaches for completion of an apprentice’s term of apprenticeship. Several of the guidelines established in Circular 2016-01 are inconsistent with the regulation at Title 29 of the Code of Federal Regulations (CFR) at part 29 (part 29). OA is replacing Circular 2016-01 with this Circular to update guidance on the criteria for Registered Apprenticeship program design under the competency-based,

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| <b>RESCISSIONS</b><br>Circular 2016-01 | <b>EXPIRATION DATE</b><br>Continuing |
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hybrid, and time-based training approaches, and to clarify guidance on elements applicable to all training approaches, including the evaluation of apprentices' performance, the provision of related instruction, the granting of advanced standing, and the issuance of a certificate of completion.

#### 4. **Guidance.**

##### a. **Registered Apprenticeship Training Approaches.**

Registered Apprenticeship involves the combination of structured on-the-job learning and related instruction in an apprenticeable occupation, which is an occupation that meets the criteria in 29 CFR 29.4. The occupation must: (a) involve skills that are customarily learned in a practical way through a structured, systematic program of on-the-job supervised learning; (b) be clearly identified and commonly recognized throughout an industry; (c) involve the progressive attainment of manual, mechanical or technical skills and knowledge which, in accordance with the industry standard for the occupation, would require the completion of at least 2,000 hours<sup>1</sup> of on-the-job learning to attain; and (d) require related instruction to supplement the on-the-job learning.

Upon an initial request for an apprenticeable occupation determination, the Registration Agency (either OA or a SAA) solicits industry input in determining whether an occupation meets the criteria at 29 CFR 29.4 described above. This process involves the creation and vetting of an industry-derived work process schedule for the subject occupation, which provides the framework for evaluating program standards for registration in the subject occupation.

29 CFR 29.5(b)(2) permits Registered Apprenticeship sponsors to select one of three methods for measuring the term of apprenticeship: the competency-based approach, the time-based approach, or a hybrid approach. Per 29 CFR 29.5(b)(2)(iv), the program sponsor selects the appropriate training approach for their program, subject to review by the Registration Agency. The Registration Agency verifies that the program's submission of proposed standards meets all the requirements set forth in 29 CFR 29.5.

If the Registration Agency finds that a sponsor's submission does not meet the requirements for program registration, the Agency will provide technical assistance as needed. However, if the Registration Agency's provision of technical assistance does not rectify the issue, the Agency will provide the sponsor with a written communication that includes an explanation of why the submission remains deficient.

##### *Competency-based Approach*

The competency-based approach (29 CFR 29.5(b)(2)(ii)) measures skill acquisition through the individual apprentice's successful demonstration of acquired skills and knowledge, as verified by the program sponsor. Programs utilizing this approach must still require apprentices to complete an on-the-job learning component of Registered Apprenticeship. The program standards must address how on-the-job learning will be integrated into the program, describe competencies, and identify an

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<sup>1</sup> The 2,000-hour standard in 29 CFR 29.4(c) is solely for the purpose of defining an apprenticeable occupation. For an occupation to be deemed apprenticeable by the Registration Agency (OA or a SAA), it must be an occupation that would require at least 2,000 hours of on-the-job learning if learning were conducted in a time-based manner.

appropriate means of testing and evaluation for such competencies.

The competency-based approach enables an individual apprentice to progress through the term of training based on the rate of that individual apprentice's demonstrated acquisition of the occupational competencies identified in the work process schedule. The means of testing and evaluating apprentices for such competencies are defined in the program standards and must incorporate written and hands-on proficiency measurement, as appropriate, for the specific competencies of the occupation.

The prior guidance provided in Circular 2016-01 included a table asserting that an apprentice must be registered in an approved competency-based occupation for twelve calendar months of on-the-job learning. In this Circular, OA rescinds this requirement because the regulation does not impose a specific amount of time an apprentice must be registered in a program utilizing a competency-based approach, and this prior requirement conflicts with measuring the term of apprenticeship based on the apprentices' attainment of competencies.

### *Hybrid Approach*

The hybrid approach (29 CFR 29.5(b)(2)(iii)) measures the apprentice's acquisition of skills necessary for the occupation through both the completion of a specified minimum number of hours of on-the-job learning and the successful demonstration of competencies, which are described in a program's work process schedule.

As a blend of the time-based and competency-based approaches, hybrid programs identify a time duration associated with the attainment of occupational competencies, also commonly expressed as a range of hours. Such a range of hours of on-the-job learning gives the apprentice the opportunity to accelerate completion of the term of apprenticeship, up to the minimum number of hours of on-the-job learning specified in the program's standards, based on the apprentice's successful demonstration of the competencies described in the work process schedule.

The prior guidance provided in Circular 2016-01 stated that once a term of a hybrid occupation has been approved as suitable for apprenticeship training (i.e., apprenticeable), the overall term of the apprenticeship (i.e., the minimum number of hours of on-the-job learning) may be adjusted upward or downward by no more than 25 percent, but not both ways. In this Circular, OA rescinds that guidance because the 25 percent maximum adjustment does not have a basis in the regulation. The overall term proposed by a sponsor utilizing the hybrid approach is subject to approval by the Registration Agency. While the Registration Agency may consider a 25 percent adjustment of the overall term as a helpful, non-binding guideline, it is not precluded from identifying instances where greater variance may be appropriate.

### *Time-based Approach*

The time-based approach (29 CFR 29.5(b)(2)(i)) measures skill acquisition through the apprentice's completion of the industry standard for on-the-job learning (at least 2,000 hours), as described in a work process schedule. The work process schedule for a time-based program must also include an outline of the specific work processes in which the apprentice will receive supervised work experience.

The minimum of 2,000 hours of on-the-job learning required in the time-based approach applies to the entire term of the apprenticeship program and is not a minimum number of hours per calendar year. A program can distribute the required hours of on-the-job learning across multiple years based on the nature of the occupation and the needs of the employer and apprentices.

The prior guidance provided in Circular 2016-01 stated that, as with hybrid programs, the proposed term of a time-based program can be adjusted upward or downward from the approved industry standard for the occupation by no more than 25 percent. In this Circular, OA rescinds that guidance because the 25 percent maximum adjustment does not have a basis in the regulation. The term of apprenticeship proposed by a sponsor utilizing the time-based approach is subject to approval by the Registration Agency. As with hybrid programs, the Registration Agency may consider a 25 percent adjustment of the overall term as a helpful, non-binding guideline, but may identify instances where greater variance is appropriate.

**b. Elements Applicable to All Registered Apprenticeship Training Approaches.**

In addition to providing updated guidance on the three training approaches, this Circular provides updated guidance and clarifications on elements applicable to all Registered Apprenticeship programs regardless of their training approach, including the evaluation of apprentices' performance, advanced standing, related instruction, and certificates of completion.

*Evaluation of Apprentices' Performance*

All three training approaches require the periodic review and evaluation of the apprentice's performance on the job and in related instruction, and the maintenance of appropriate progress records, as required by 29 CFR 29.5(b)(6). Sponsors are encouraged to consider the use of an end-point assessment to verify that the apprentice can demonstrate proficiency in the competencies of the occupation included in the work process schedule. OA plans to provide future guidance on the topic of end-point assessments.

*Granting Advanced Standing to Apprentices*

Program standards must include a provision that addresses the sponsor's policy for the granting of advanced standing or credit for demonstrated competency, acquired experience, training, or skills for all applicants equally, as specified in 29 CFR 29.5(b)(12). A sponsor's policy for granting advanced standing should be based on objective criteria and must be applied uniformly for all apprentices. Advanced standing can be applied to both the related instruction and the on-the-job learning components of an apprenticeship program. Advanced standing may be granted based on an apprentice's prior experience, an apprentice's demonstrated competency during on-the-job learning, or both. As specified in the regulation, a sponsor's granting of advanced standing must be accompanied by commensurate wages for any progression step granted.

When available, sponsors are encouraged to incorporate existing standardized industry practices or pre-existing assessments related to the evaluation of occupational competencies and the awarding of credit for prior learning. Registered Apprenticeship programs that have documented partnerships with pre-apprenticeship programs should consider reviewing the curriculum of the pre-

apprenticeship program to assess if advanced standing can be granted for acquired competencies or knowledge to apprentices that enter the Registered Apprenticeship program following completion of the pre-apprenticeship program.

For pre-existing training programs newly registered as a Registered Apprenticeship program, advanced standing can be provided to an apprentice for on-the-job learning or related instruction that was completed prior to the registration of the program and aligns with the work processes and related instruction in the sponsor's approved program standards.

The prior guidance provided in Circular 2016-01 asserted that the maximum allowable credit for prior work experience is 50 percent of training. In this Circular, OA rescinds this guidance because the regulation does not impose this limitation on the granting of advanced standing.

Registration Agencies are advised to review the degree and frequency with which advanced standing is provided to apprentices within a program to ensure advanced standing is only provided in a manner consistent with the sponsor's written policy included in the program standards. Sponsors must retain appropriate documentation to support their decisions to grant advanced standing consistent with their established written policy, such as preserving the results of any examinations or assessments, and be prepared to share this documentation with the Registration Agency as requested.

OA recommends that Registration Agencies pay particular attention to the advanced standing policies established by programs that operate in industry sectors with high rates of fatal work-related deaths, as described in Circular 2021-02, to ensure the sponsor's obligation under 29 CFR 29.5(b)(9) to provide appropriate safety training for apprentices on the job and in related instruction is being fulfilled.

### *Related Instruction*

All three Registered Apprenticeship training approaches must include the provision of organized, related instruction in technical subjects related to the occupation, as required under 29 CFR 29.5(b)(4). The related instruction must be designed to provide the apprentice with knowledge of theoretical and technical subjects related to the apprentice's occupation, and may be given in a classroom, through occupational or industrial courses, by correspondence courses of equivalent value, electronic media, or other forms of self-study approved by the Registration Agency. The regulation recommends, but does not require, a minimum of 144 hours of related instruction for each year of apprenticeship.

Sponsors may count the number of hours of related instruction in their program standards utilizing clock hours, credit hours, contact hours, or alternative, commonly recognized measures of time to quantify the amount of technical and theoretical instruction related to the occupation provided to apprentices. In assessing the related instruction included in a sponsor's program standards against the recommended minimum of 144 hours per year, Registration Agencies should assess the instructional content, learning objectives, and the total workload against what is appropriate for the occupation. Time spent on direct instruction and out-of-class work can be counted, consistent with the regulation's inclusion of correspondence courses and self-study under the definition of related instruction.

The part 29 regulation affords sponsors considerable flexibility in sequencing the provision of related instruction to supplement an apprentice's on-the-job learning. Related instruction may be front-loaded, segmented, or delivered concurrently with the on-the-job learning. In practice, a program may propose more than 144 hours of related instruction in the first year, with less than 144 hours in later years of a program's overall term, and still meet the recommended 144 hours of related instruction per year of the apprenticeship at 29 CFR 29.5(b)(4). Sponsors should consider, however, how their plan for the distribution of related instruction fits with the program's work process schedule and the overall term of apprenticeship. For example, in determining the sequencing of related instruction and on-the-job learning, sponsors may consider whether apprentices training in the subject occupation would benefit from applying theoretical and technical learning concurrent with on-the-job learning, or whether apprentices may be better positioned receiving instruction in the foundational theoretical and technical concepts prior to (or during the initial phases of) on-the-job learning.

Every apprenticeship instructor involved in the provision of related instruction must meet the State Department of Education's requirements for a vocational-technical instructor in the State of registration or be a subject matter expert. A subject matter expert is an individual, such as a journeyworker<sup>2</sup>, who is recognized within an industry as having expertise in a specific occupation. The determination of whether an apprenticeship instructor qualifies as a subject matter expert is made by the sponsor, subject to review by the Registration Agency. Additionally, all apprenticeship instructors must have training in teaching techniques and adult learning styles, which may occur before or after the apprenticeship instructor has started to provide the related technical instruction.

### *Certificate of Completion*

As specified in 29 CFR 29.5(b)(15), program standards must contain a provision that covers recognition of an apprentice's successful completion of an apprenticeship program by providing an appropriate certificate issued by the Registration Agency. The Registration Agency issues these certificates of completion to apprentices once sponsors certify and document that the apprentice has successfully completed the apprenticeship training requirements specified in the standards of apprenticeship.

The prior guidance provided in Circular 2016-01 stated that in order to receive a certificate of completion, the apprentice was required to have worked under the program sponsor as a registered apprentice in the apprenticeable occupation for a minimum of six months (and in the case of a time-based or hybrid program, a minimum of 1,000 hours), exclusive of any advanced standing granted. In this Circular, OA rescinds this guidance because the regulation does not impose these limitations on the awarding of a certificate of completion to an apprentice.

If an apprentice has been employed by the program sponsor for less than six months (or less than

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<sup>2</sup> Per the definition at 29 CFR 29.2, "journeyworker" means "a worker who has attained a level of skill, abilities and competencies recognized within an industry as having mastered the skills and competencies required for the occupation. (Use of the term may also refer to a mentor, technician, specialist or other skilled worker who has documented sufficient skills and knowledge of an occupation, either through formal apprenticeship or through practical on-the-job experience and formal training.)" Sponsors often determine which of their employees can serve as a journeyworker providing on-the-job learning or related instruction to apprentices.

1,000 hours), prior to issuance of a certificate of completion, OA recommends that Registration Agencies carefully review all documentation related to the sponsor's advanced standing policies, the sponsor's policy for the evaluation of apprentice performance and measurement of the attainment of skills and competencies, and the sponsor's application of these policies in practice.

**5. Inquiries.**

If you have any questions concerning the content of this Circular, please contact the Office of Apprenticeship at [OA.Policy@dol.gov](mailto:OA.Policy@dol.gov).

**6. References.**

- National Apprenticeship Act, 29 U.S.C. 50
- 29 CFR part 29