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WRTP/BIG STEP Recommendations to the US Department of Labor (DOL) Regarding Workforce Innovation and Opportunity Act (WIOA) Program Design to Encourage Registered Apprenticeships

WRTP/BIG STEP has developed recommendations to DOL as they relate to access to Registered Apprenticeships. To date, these recommendations include:

Recommendation

- Ensuring WIOA regulations and funding allow for the kind of time and investment needed to help individuals build an application, enter and succeed in Registered Apprenticeships. The current rules Exit a participant as soon as they enter the Registered Apprenticeship system.

One possibility would be to enroll ALL individuals entering a Registered Apprenticeship into WIOA and providing a range of services as deemed appropriate by Local Board. The types and level of service might diminish as an individual progress through their Apprenticeship.

- Support eligible WIOA participants who are in apprenticeship readiness activities with a range of services.
- Provide recognition, ideally financial, to the significant investment the private sector makes when they sponsor a Registered Apprenticeship. There should at minimum be visible recognition at all levels: local, state and national of Industry/employers who fully support Registered Apprenticeships. Alternative methods for supporting an apprenticeship program need to be publicized, such as “shared apprentices.”

Rationale

Current funding emphasizes short-term, very course specific training and doesn't account for preparation to enter the trades and alternative training opportunities such as confined space awareness and valuable industry certifications like OSHA10/30, first aid, CPR, etc. and recognize that Registered Apprenticeship can last 18 months to 5 years.

This comprehensive approach will assure the workforce system supports Registered Apprentices. This effort would not require anything more of apprentice sponsors. Boards can respond by providing everything from assistance with training, to supportive services to some form of peer mentoring to encourage program completion.

The level of support can range from training to supportive services and can expand to Needs Related payments to support the individual until they become an apprentice.

The private sector provides significant investment in their apprenticeship training programs. These costs can include instructional costs, wages paid for on-the-job learning, wages paid to journeymen who provide the training and other investments. These expenses and obligations are often viewed as barriers for sponsorship and foster a belief that only “big employers” have the capacity to sponsor a Registered Apprenticeship program.

- Assure Technical Assistance is provided at all levels of the system from employers to workforce leadership to understand both the value of/ and required resources needed for Registered Apprenticeship enrollments and completions.
- Structure and encourage training of One-Stop staff on the advantages and requirements of Registered Apprenticeship
- Make available information to the K-12 system with emphasis on 8th grade and up to Career Counselors and teachers involved in Tech Ed. Assure outreach efforts such as Dream It! Do It! Explain the advantages of apprenticeships and the family supporting careers these link to.
- Add to the Performance Measure the capacity to measure/count RAs and particularly provide the ability to measure the RA as different points in the process.
- DOL support for cross-department support structures to be built between Federal Departments such as HUD, Transportation, Defense, HHS which through their guidance and funding, encourage industry/employer efforts to sponsor and create new Registered Apprenticeships. At the state level, DOL should also encourage cross-departmental and agency collaboration with state transportation, health and social services and other relevant departments to also encourage employer participation in Registered Apprenticeships. These cross-departmental efforts (both national and state-based) should emphasize the alignment of performance and reporting

There is very little understanding the Registered Apprenticeship system, its value to employers and how it can address the skills gap so many employers currently experience. Funds need to be made available that funding staff to help publicize the strength of RAs. This information gap currently exists at all levels from federal, state and county.

Our experience has shown that most Case Managers and Business Servicers know little about apprenticeships, their requirements, as well as the advantage to the apprentice. This kind of information needs to be generally shared and understood.

Our work with a local technically oriented High School as well as with other High Schools and Middle Schools in the area has shown that the Registered Apprenticeship system and the excellent paying jobs these lead to are not understood nor appreciated by the K-12 system. Particular emphasis needs to be placed at the Middle School and High School level where Counselors and teachers can have an impact on students' post-secondary choices. The advantage apprenticeships need to be reinforced to parents and youth.

This recommendation arises from current WIA common practice to close-out the participant from WIA once they become an apprentice which by WIA standards is to be counted as a "placement." Starting an Apprenticeship is the starting point for an apprentice not the end; other measurement methods need to be found to show movement along a process.

Experience in working with construction incentive programs to hire underrepresented workers confirm that other mandates can have an impact on encouraging access to typically unrepresented groups to jobs in sectors such as construction. Federal and State departments which administer bids for programs should encourage the use in an appropriate manner of apprentices. Bid guidelines could motivate industry sectors that currently see very little economic benefit towards sponsoring Registered Apprenticeships, for example in manufacturing and IT. Any alignment of performance and reporting efforts can increase organizational efficiency. Time and effort is spent on actual services rather than different reports.

- Create definition of terms such as “training”, “placement”, etc. to ensure they accurately reflect the participants’ progress in the Registered Apprenticeship process. Other terms that should be clarified in terms of a Registered Apprenticeship include “incumbent worker” and “on the job training.”
- A healthy apprenticeship system needs to encourage the view that individuals are on a continuum of learning, jobs and careers that lead to increasing skills and commensurate pay levels.
- Workforce Intermediaries that understand the needs, values and approach of specific industry sectors and also link to the labor unions need to be supported and their intermediary role valued in the system. The role of Labor in providing access to articulating workers’ knowledge and industry expertise needs to be acknowledged and encouraged. Funding investment is core to this support.
- States should provide guidance that Local Plans/ Local Areas include outcomes/metrics on Registered Apprenticeships. If states provide guidelines on percentage goals, these should be reinforced through incentives.

The current WIA measurement system is very dualistic and permits or encourages progress along a training continuum. The range of terms from training, incumbent worker, apprentice, OJT presently demarcates who can be served and what the various funding and match requirements. This often impedes a flexible response to workforce needs.

The current system has a two box approach of you are either an incumbent worker or unemployed who needs to be employed. This has made it very difficult to serve incumbent workers or individuals who recently were unemployed, but would strongly benefit from additional training support, particularly as the progress in their Registered Apprenticeship. The underemployed are often in low wage jobs that help them get through early training programs, but are in actuality not incumbent workers in the fields they are training. This confusion in categorization often shuts them out of services and trainings desperately needed to better their lives simply because they are working at all. Conversely, they are also shut out of services intended for incumbent workers. Creating an entirely new category such as underemployed could allow for a cross services approach in a wider variety of programming.

Program evaluations conducted on our programs have shown that the Intermediary model provides an efficient, highly effective approach to linking economically disadvantaged to career pathways and middle skill jobs. This role and its demonstrable strength is not universally understood and valued by public and private funders. Work such as harnessing existing community resources and political efforts not only make sense on a service provider level, but from a policy standpoint utilize a model of avoiding duplication of efforts while using a holistic approach to workforce readiness and support structures. The information these intermediaries can gather range from sector partnerships down to the worker.

Measurement of progress towards a goal is crucial. Requiring change is difficult. Incentives will provide both the kind of financial assistance a Board needs to both work towards and measure its involvement with Registered Apprenticeships.

- State workforce systems need to strengthen incentives for Local Boards to promote Registered Apprenticeships.
- Support Apprentice Readiness programs.

Valuing and implementing a system that requires greater emphasis on Registered Apprenticeships is a paradigm shift. This kind of system change requires both measurement and incentives to increase participation.

Part of creating a system that encourages participation in Registered Apprenticeships is providing access and skills preparation. This is particularly important for individuals who come from typically underrepresented groups in the Trades.