



Subcommittee on Education and Credentialing White Paper

The Subcommittee on Education and Credentialing was charged with exploring educational opportunities to help ensure that more individuals are able to enroll in and complete apprenticeships; realizing key strategies for increasing consistency among providers of related technical instruction; identifying strategies for making technical instruction more affordable for apprentices and employers; and exploring strategies for relying on standards-based, nationally portable, industry-recognized credentials as critical elements of quality assurance and accountability.

As a first order of business, the subcommittee recognized that the Task Force on Apprenticeship Expansion (Task Force) would need an understanding of, and agree to, a set of terms and definitions. That glossary of terms is included as Attachment A to this White Paper.

Recommendations and Rationale

- 1. Referencing the Work and Learn Model Continuum [included as Attachment B to this White Paper], the Industry-Recognized Apprenticeship program should expand more traditional work and learn models to incorporate the criteria of modern apprenticeship and to ensure better outcomes for workers and employers.**

There is a well-recognized continuum of work and learn models ranging from career fairs, industry tours, job shadowing to mentorship, clinical practicums, on-the-job training, internships, and co-ops. Generally, these models are on a continuum from “low touch” – less structured, low employer engagement, and varying practical experiences that reflect daily job tasks – to “high touch” – very structured, high employer engagement, and full immersion in the most relevant working environment by the learner.

Today, many employers and industry sectors have developed and are implementing competency-based work and learn models that link success to the mastery of established skills sets, rather than completing courses and on-the-job training based on a rigid – and sometimes arbitrary – set of hours. The Industry Recognized Apprenticeship program is a vehicle to move more traditional work and learn initiatives to higher levels of employer engagement and to achieve better outcomes for workers and employers.

2. Industry-Recognized Apprenticeships must include work-based learning and performance assessment to ensure that the individual can apply knowledge, skills, and abilities related to the job, as well as obtain the education credentials needed to advance on the job and in his/her career.

Certifiers of Industry-Recognized Apprenticeships should help ensure those apprenticeships incorporate the core components of the most successful work and learn models, namely:

- Blended Learning
- Credit for Prior Knowledge and Experience
- Industry-Recognized Skill Standards and Credentials
- Structured Mentorship
- Paid Work Experience and Advancement Opportunities
- Portable, Industry-Recognized Credentials, Program Completion Certificates, and/or Degrees with Demonstrable Labor Market Value

Hands-on, real world work opportunities help students connect the dots between what they learn in school and what they will need to know to be successful in their careers. Features of today's workplaces make this connection more important than ever. Members of today's workforce often need specific and advanced skills; they need to be agile and flexible; and come ready with employability skills such as teamwork and problem solving. These skill sets are increasingly important in the modern workforce. With the infusion of technology into virtually every workplace and industry sector, employees also need to be able to innovate quickly and continuously while also acquiring new skills.

Work and learn partnerships are the most successful way to address these challenges, and Industry-Recognized Apprenticeships that incorporate the core components outlined above will provide a clear pathway for working learners to gain the real-world experience they need.

3. Where there are standards-based, nationally portable, industry-recognized credentials in the field of new Industry-Recognized Apprenticeships, the Industry-Recognized Apprenticeship program should ensure integration of the opportunity to earn the credential[s] and evidence that related technical instruction is aligned to both the theory and performance-based learning outcomes required for the credentials.

These credentials are important vehicles to better connect employers and learning providers. They ensure that competency-based instruction is aligned to the knowledge, skills, and abilities needed on the job and increase consistency among providers of related technical instruction. Learning providers as referenced throughout this paper include career and technical education, two- and four-year institutions, as well as virtual learning programs or systems.

When industry sector leaders take responsibility for convening employers within their sector, they expend time and financial resources to identify and continuously update and document the knowledge, skills, and abilities necessary for workers to perform in their jobs. When

industry sector leaders do so, the resulting standards-based learning outcomes and industry-recognized credentials present to workers, educators, and employers, a unified identification of the competencies required for success on the job.

Industry organizations that invest in the creation and continuous improvement of industry-recognized credentialing programs report that the credentials provide workers with a clear understanding of the knowledge, skills, and abilities needed to be successful on the job; they provide educators with the competencies that should drive – and often accelerate – educational pathways to employment and advancement; and they also provide employers within the industry with workers whose knowledge and skills have been validated through performance assessment.

With increasing evidence that workers no longer tend to remain in one job, one company, or even one industry sector for their entire career, the national recognition and portability of standards-based, industry-recognized credentials are critical attributes and of great value to both workers who will be mobile in their careers and lives, and employers who expand business lines and grow operations in multiple venues across the country.

4. To rely on standards-based, nationally portable, industry-recognized credentials as a key element of Industry-Recognized Apprenticeship programs quality assurance and accountability, the public-private sector partners implementing these programs should articulate the requirements for standards-based, nationally portable, industry-recognized credentials.

To ensure an educated and skilled workforce for their companies, many industries have successfully developed and implemented industry-recognized credentials to connect individuals to the skills they need to enter into and advance in jobs. Most of these industry credentialing programs are tied to competency models that national industry associations are issuing to help businesses identify workers who possess the skills and competencies necessary to perform in high-growth occupations. The type, scope, use, and delivery of these credentials are as diverse as the industries that employ them. The commonalities that exist within the wide range of industry credentials include national portability, a foundation in industry-developed standards, and recognition by industry – attributes that contribute to their labor market and consumer value.

As one of several examples, the National Network of Business and Industry Associations, managed by the Business Roundtable and includes 25 national trade/industry associations, has articulated the requirements for and attributes of standards-based, nationally portable, industry-recognized credentials, which the public-private sector partners implementing Industry-Recognized Apprenticeship programs could use as part of its review.

5. As Industry-Recognized Apprenticeship programs' federal partners, the U.S. Departments of Labor and Education should implement and/or support strategies for making technical instruction more affordable for apprentices and employers by:

- Partnering with virtual learning providers to expand the reach and reduce costs of technical instruction;
- Identifying or producing foundational, core curriculum in each sector and “open sourcing” it for learning providers; and
- Where duplications are evident, cease federally funding development of duplicative curriculum or assets.

As the Industry-Recognized Apprenticeship program differentiates itself from the Registered Apprenticeship program, the technical instruction must be competency-based, not seat-time based, and must be directly aligned to knowledge, skills, and abilities needed on the job. The instruction also must be more readily available to new apprenticeship participants. Participants must be able to progress at their own pace suited to their personal learning styles, so the training is more efficient and tailored to individual needs and employer requirements. Having virtual learning options, e.g., platforms, providers, etc., will help ensure the Industry-Recognized Apprenticeship program remains flexible, agile, and attuned to working learners’ needs.

It also should be recognized that in virtually every industry sector, there are some core underlying employability skills, foundational processes, and technologies that merit the creation of foundational, core curriculum which could be “open-sourced” for an array of learning providers, ultimately saving duplicative development costs at multiple institutions or by multiple providers.

6. This subcommittee also recommends federal action to:

- **Identify and make available capacity-building resources for Industry-Recognized Apprenticeship program certifying organizations to ensure they are equipped to provide quality services in support of Industry-Recognized Apprenticeships;**
- **Identify and make available capacity-building resources for institutions of higher education, other service providers, and employers to partner in planning for and building needed capacity; and**
- **Reform the Registered Apprenticeship program to modernize the system and encourage greater employer and industry sector involvement.**

Many employers and industry organizations today report that the uneven interpretation of guidelines and regulations by the workforce development system makes it difficult, if not impossible, for employers to access the relatively limited funding available to support apprenticeship through the Workforce Innovation and Opportunity Act. Sponsors of apprenticeships must also navigate additional federal agency structures and processes in order to access available apprenticeship supportive funding that may be available through the U.S. Departments of Education, Justice, Veterans Affairs, Agriculture, Defense, Energy, Transportation, Health and Human Services, and Housing and Urban Development.

As a result, the Task Force urges clarification and/or alignment of funding availability via the Workforce Innovation and Opportunity Act, the Carl D. Perkins Career & Technical Education Act, Federal Work-Study, and/or the Federal Pell Grant Program, at a minimum. This subcommittee also urges consideration of use of H-1B resources for competitive grants to partner business organizations and learning providers to support the development of American talent via non-redundant, competency-based educational pathways that include integrated work experience.



Subcommittee on Attracting Business to Apprenticeship White Paper

According to the Bureau of Labor Statistics, U.S. businesses will need to fill 18.7 million job openings by 2026.ⁱ As today's labor shortages demonstrate, it is foolish to assume that current training models are suited to preparing workers for these jobs, let alone tomorrow'sⁱⁱ "new collar" jobs. The need for postsecondary education is a common element across industries and occupations: 65 percent of all replacement jobs and 85 percent of all new jobs will require some level of postsecondary educationⁱⁱⁱ. However, the traditional four-year education model often is disconnected from business needs and not suited for providing workers the combination of skills and practical work experience that employers value. Today, there are over 500,000 technology jobs open, but U.S. colleges and universities produce only 50,000 graduates each year, creating a shortfall in skilled candidates across economic sectors^{iv}.

Apprenticeships provide businesses and educational institutions a proven, but underused, partnership model to develop a skilled, flexible, and mobile workforce that will meet businesses' current needs, be prepared to adapt to tomorrow's needs, and alleviate workforce shortages.

As the Federal Government establishes a new institutional foundation for American apprentices, it is critical to foster increased business investment in apprenticeships by building robust financial and technical tools to incent and streamline the use of apprenticeship, strengthening our collective understanding of workforce needs, and creating a comprehensive online platform to disseminate resources and tools targeted to business. It cannot be overstated that there should be clearly defined incentives for employers who choose to participate.

RECOMMENDATION 1: Improved Risk-Sharing Tools and Streamlined Processes to Manage Them

Launching new apprenticeship programs requires companies to make a significant resource commitment and assume long-term risks to build out new recruiting and training models. A long-term focus does not necessarily mean that programs are long or costly; in fact, apprenticeship programs vary significantly in length and cost. According to a 2016 joint study by the U.S. Department of Commerce and Case Western Reserve University, "the longest program studied lasted more than four years; the shortest, one year, and costs range from

\$25,000 to \$250,000 per apprentice. In addition to labor costs, other apprenticeship program costs included program start-up, tuition and educational materials, mentors' time and overhead."

As Federal and State Governments promote apprenticeships, they need to ensure that existing financial programs are aligned to current apprenticeship policy and that businesses know how to access them.

According to recent research by GAO (2011), there are more than 40 workforce development programs across nine federal agencies.^v Data shows that these programs were funded with more than \$42 billion, although less than half that amount (\$17 billion) went to employment and training activities. Based on this data, there is a clear need to streamline and simplify programs by developing an organized approach that recognizes and preferentially funds apprenticeship.

- Update federal funding criteria to:
 - Ensure Registered Apprenticeship programs and Industry-Recognized Apprenticeship programs are treated equally;
 - Encourage the development of apprenticeship programs for new hires as well as incumbent workers; and
 - Encourage the reallocation of state resources to apprenticeship.
- Streamline state grant access by creating a single application to reduce the tremendous burden on multi-state firms that are new to apprenticeship.
- Explore sector-led financial options to help scale Industry-Recognized Apprenticeship programs and Registered Apprenticeship programs. Examples include new models of public/private partnership, income sharing agreement models with private sector capital, and others that can be developed across sectors.
- Evaluate all Federal Government workforce development programs according to a robust set of criteria and realign funding for underperforming programs to Industry-Recognized Apprenticeship programs as a strategy to kick start the adoption of the model across industry sectors.

RECOMMENDATION 2: A Robust Needs Analysis to Narrow Down the Areas of Most Acute Skills Shortage

Businesses and policymakers lack information about skills shortages in individual companies and across the economy – that is, on the gap between workforce needs, available labor supply, and education and training programs. Businesses, especially those without dedicated HR staff, may not know how to conduct a needs assessment, let alone how to connect the needs identified to the development or adoption of work-based learning programs.

At the same time, businesses are unclear about the solutions apprenticeship can offer to common labor challenges. They lack information on how apprenticeships can be created to broaden their recruiting pool and potentially lower recruiting cost. Apprenticeships also allow companies to diversify their workforce by reaching pools of candidates that companies previously had not considered as well as upskilling incumbent workers, effectively creating new career paths for long-tenured workers whose prior jobs have changed due to technology or other factors. According to the U.S. Department of Labor, 91 percent of apprentices retain employment after the program ends – a data point that is highly attractive to employers.

- Via the U.S. Department of Labor apprenticeship website, the Department should include a needs analysis adaptable to businesses of all sizes and catered to priority Industry-Recognized Apprenticeship program sectors, as cited in the Executive Order and the President’s 2019 budget.
- The Bureau of Labor Statistics and the U.S. Census Bureau should develop a joint project to measure businesses’ skills shortages and training investments through existing surveys, administrative, and third-party data. The Bureau of Labor Statistics should develop a supplement to the Job Openings and Labor Turnover Survey, and the U.S. Census Bureau should develop a module to the new Annual Business Survey as potential new survey vehicles.
- The U.S. Department of Labor’s Office of Apprenticeship should establish a partnership with the U.S. Census Bureau to research and publish metrics on the long-term employment outcomes and retention of apprentices relative to other workers. This project could build upon an existing joint project between the U.S. Census Bureau, the National Association of Manufacturers, and the National Skills Clearinghouse.
- Industry associations should be encouraged to play a critical role in gathering data from sector employers. As a means of evaluating effectiveness and broadening awareness, associations could produce sector-wide case studies to help companies quantify the return on investment for both apprenticeship programs and other training programs where employer dollars are being spent. As companies and trade associations gather this return on investment data, the Federal Government should enable the dissemination of this information, as well as other aspects of a well-rounded return on investment, including incentives, recognitions by the U.S. Department of Labor and the applicability of Registered Apprenticeship, and Industry-Recognized Apprenticeship program to college credit or articulation.
- To allow widespread adoption of apprenticeship, certifiers of Industry-Recognized Apprenticeship program should keep consistent data and metrics as established by the U.S. Department of Labor to indicate their program success, as well as showcase proof of concept to enable industry expansion.

RECOMMENDATION 3: Centralized Apprenticeship Resources

For many organizations, the creation of an in-house apprenticeship program is daunting. Apprenticeship is considered a highly structured, expensive, and long-term commitment by companies and candidates alike. In times of quick economic shifts and pressure on quarterly earnings, it is difficult to garner leadership support for a long-range workforce development effort.

What many employers do not consider is that, according to the Center for American Progress, “86 percent of Registered Apprenticeship sponsors in the United States say they would strongly recommend hiring an apprentice, in addition to the 11 percent who say they would recommend Registered Apprenticeship with some reservations. All told, a total of 97 percent of sponsors in the United States recommend apprenticeship programs.”^{vi} It is as close to a “sure bet” in talent development as we have.

Much of the hesitation on the part of the private sector to embark on apprenticeship program development is due to the lack of a single, online community for apprenticeships targeted to businesses, as well as to educational institutions and workers. As a first step to creating this community, the U.S. Department of Labor, in partnership with the U.S. Departments of Commerce and Education and with industry groups, should compile the best existing information available to companies on apprenticeship. The U.S. Department of Labor’s Apprenticeship Toolkit is an excellent starting point for basic information on apprenticeship.^{vii} However, the launch of Industry-Recognized Apprenticeship program created the need and opportunity for a robust, centralized site to attract and bring together more employers to create apprenticeships.

These resources should include:

- The Apprenticeship Playbook;^{viii}
- The Benefits & Costs of Apprenticeship: A Business Perspective;^{ix}
- Industry-developed occupational competencies;
- Industry-developed, competency-based apprenticeship standards;
- Curricula that align with those standards (made available through a central provider or a network of providers);
- Instruction and resource guides for trainers/educators;
- Instruction and resource guides for mentors;
- Resources on how to develop online learning programs that can be used to complement or replace traditional classroom training, when appropriate;

- National certification for Industry-Recognized Apprenticeship programs and Registered Apprenticeship programs;
- Research that assesses the effectiveness of various models of work-based learning; and
- Detailed company case studies spanning industries targeted for apprenticeship expansion, such as manufacturing, health care, and cybersecurity.

ⁱ https://www.bls.gov/emp/ep_table_102.htm

ⁱⁱ <https://www.federalreserve.gov/monetarypolicy/beigebook201803.htm>

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^v <https://www.gao.gov/new.items/d1192.pdf>

^{vi} <https://www.americanprogress.org/issues/economy/news/2014/07/14/93768/the-bottom-line-apprenticeships-are-good-for-business/>

^{vii} <https://www.dol.gov/apprenticeship/toolkit/toolkitfaq.htm>

^{viii} http://www.themanufacturinginstitute.org/-/media/53456D700856463091B62D1A3DA262F4/Full_Apprenticeship_Playbook.pdf

^{ix} <https://www.commerce.gov/news/fact-sheets/2016/11/benefits-and-costs-apprenticeships-business-perspective>



Subcommittee on Access, Equity, and Career Awareness White Paper

The creation of the Task Force on Apprenticeship Expansion (Task Force) has brought together key government agencies (U.S. Departments of Commerce, Education, and Labor, specifically) and stakeholders from multiple disciplines to advance the objective of defining the expansion of apprenticeship. The same energy was then harnessed in a subcommittee focused on access, equity, and career awareness.

The subcommittee members universally agreed that multiple on-ramps must be created to build an American talent pool for industry. To that end, all Americans must have an opportunity to participate in the Industry-Recognized Apprenticeship program, a new apprenticeship model. Additionally, the responsibility to make the Industry-Recognized Apprenticeship program effectively inclusive must be shared by the key stakeholders (e.g. sponsors, certifiers) and the U.S. Department of Labor. This inclusion should involve community-based organizations, functioning as national intermediaries or within local markets. Community-based organizations represent a tested methodology for reaching populations such as women, people of color, and persons with a disability who have historically suffered from unequal access and under-utilization.

Following extensive discussion, the Subcommittee on Access, Equity, and Career Awareness submits the following recommendations:

1. Awareness: The subcommittee believes that building brand awareness of apprenticeship through a multi-faceted campaign will promote faster, more respected, and more diverse pathways to employment.

To realize the full benefits of Industry-Recognized Apprenticeship programs, the Federal Government should invest in the development and deployment of a multi-faceted campaign of awareness to multiple stakeholders such as industries, employers, educators, counselors, workforce development practitioners, and potential apprentices. For the campaign to be effective, these stakeholders cannot be passive recipients of the message; they must also become conduits of message delivery. This should be done through the following:

- Financial support of online campaigns that use high impact digital and social media vehicles that speak to multiple generations;
- Promotion of apprenticeship as a positive earn and learn pathway that can benefit new and current employees seeking to move up career ladders. This could be realized by the utilization of all federal funding mechanisms to ensure both the traditional trades, as well as non-traditional industry sectors are engaged through apprenticeship; and

- Funding the research and promotion of the findings of the monetary return on investment of employing and training American apprentices through the Registered Apprenticeship, Industry-Recognized Apprenticeship program, and other industry-based programs.

2. Access: The subcommittee believes that the Federal Government has acknowledged the necessity of apprenticeship programs as a model that can expand pathways of opportunity and incentivize utilization of an earn and learn model for both the employer and apprentice.

To realize the full benefits of Industry-Recognized Apprenticeship programs, the subcommittee recommends the following:

- Use of federal investments to specifically expand and support pre-apprenticeship activities in middle and secondary schools for career and technical education and/or other educational certificates;
- Examine and reduce barriers that exist around reciprocity of industry-recognized credentials;
- Promote the use of technology for all learners to access information about industry-approved apprenticeship programs early on in their education;
- Streamline credit for prior learning and/or work experiences to accelerate the time to full employment; and
- Develop linkages for digital platforms and/or social media channels where employers and potential apprentices can more easily connect.

3. Equity: The subcommittee believes that equal access to employment opportunities will be a defining element of Industry-Recognized Apprenticeship programs. Equity is about ensuring that each American has equal access and opportunity to the benefits of apprenticeship and employment. In some cases, the subcommittee has recognized that regulatory benchmarks are important, but can prevent industries from participating due to burdensome compliance or overly bureaucratic or inconsistent processes.

To that end, this subcommittee recommends the following:

- The U.S. Department of Labor should implement clear guidelines that reinforce the principles of equity and define certifier, sponsor, and Office of Apprenticeship responsibilities;
- Certifiers and sponsors should develop comprehensive outreach strategies to reach diverse populations; and
- The U.S. Department of Labor should continue funding community-based organization efforts to expand access to populations who have historically suffered from unequal access and under-utilization to Registered Apprenticeship programs and expand funding to Industry-Recognized Apprenticeship programs.

4. Additional Recommendation: Recommend that identified and agreed upon improvements to the Registered Apprenticeship system be pursued and implemented.

Registered Apprenticeship has been a viable tool for decades. Notwithstanding its utility, potential industry operators and others have identified several concerns regarding the operational efficiency and/or bureaucratic nature of Registered Apprenticeship. The U.S. Department of Labor should vet these concerns and where such vetting bears out the efficacy of the concerns, the U.S. Department of Labor should take all legislative and/or regulatory actions to improve and preserve the Registered Apprenticeship system.



Subcommittee on Administrative and Regulatory Strategies to Expand Apprenticeship White Paper

Over the past several months, the Subcommittee on Administrative and Regulatory Strategies to Expand Apprenticeship has held robust discussions on the proposed Industry-Recognized Apprenticeship programs, based on the draft guidance document that the U.S. Department of Labor shared with the subcommittee, and in larger sense discussions on how these changes in apprenticeship training would impact the Registered Apprenticeship system. Based upon these deliberations, the subcommittee has made the following recommendations regarding the proposed Industry-Recognized Apprenticeship system:

- Begin Industry-Recognized Apprenticeship program implementation with a pilot project in an industry without well-established Registered Apprenticeship programs to test the process for reviewing certifiers, and to better understand how to support industry groups working to develop standards and materials for Industry-Recognized Apprenticeship programs.
 - Several subcommittee principals have expressed interest in beginning pilot programs in their industry sectors as soon as the U.S. Department of Labor can begin the implementation process.
- Industry-Recognized Apprenticeship programs should focus on mastery and competency, not just seat-time or training hours. Sectors should set standards based on industry needs; establish different requirements in technical vs. professional occupations within sectors.
 - Different industry sectors are expected to develop different apprentice training standards based upon the needs of employers within these industries. The U.S. Department of Labor's Industry-Recognized Apprenticeship program implementation guidelines should allow for flexibility in determining these standards.
- Fundamental to the success of apprenticeship is a well-designed, and highly structured work experience. This is where most learning takes place. Industry-Recognized Apprenticeship program standards and quality guidelines must support this structured learning experience, as well as ensure the safety of apprentices and their coworkers.

- The U.S. Department of Labor Industry-Recognized Apprenticeship program implementation guidelines should spell out the quality standards for Industry-Recognized Apprenticeship programs and require that industry groups describe in detail the structured learning experience that is at the heart of every apprenticeship program.
- Industry-Recognized Apprenticeship program participants cannot be considered as apprentices for the purpose of meeting the Davis-Bacon Act wage requirements.
 - This recommendation is specific to the construction industry.
- Industry-Recognized Apprenticeship programs are not required to follow specific wage progression rules but must make clear to apprentices what wages they will be paid and under what circumstances wages will increase.
 - Industry-Recognized Apprenticeship program guidelines should specify that apprentices have detailed and up-to-date information regarding the wage structure for the duration of their apprenticeship and opportunities for advancement in their respective industries.

Industry-Recognized Apprenticeship Program Questions

Because the new Industry-Recognized Apprenticeship programs and Registered Apprenticeship will be parallel and complementary apprenticeship systems, the members of this subcommittee believe that their simultaneous reform and launch could create uncertainties for companies, trade or industry groups, educational institutions, labor unions, and other key stakeholders, which could slow the needed expansion of apprenticeships in the United States. Our recommendations highlight key questions for the Administration to address in the Industry-Recognized Apprenticeship program implementation process. We have categorized these questions into three areas: governance, reporting requirements, and the Industry-Recognized Apprenticeship program certification process.

Governance

- What will the U.S. Department of Labor do if there are multiple trade or business associations within an industry sector and they develop conflicting or inconsistent industry standards? What safeguards will be put in place to prevent conflicts of interest on the part of certifiers that are also membership organizations?
 - The U.S. Department of Labor should solicit proposals for governing or oversight bodies that include multiple trade or business associations within an industry sector. This governing body should be required to reach agreement on certification standards as a criterion for the Department's approval. Leadership of this governing body should rotate on an annual basis between members to ensure a balanced perspective over time.

- How will trade associations and industry groups who do not have expertise in developing curriculum negotiate college credit on behalf of their members? Colleges control prior learning assessment and transfer of credit issues, and while certifiers could encourage partnerships between employers and colleges, they could not enforce these partnerships or prior learning credit agreements.
 - Industry-based governing bodies, in consultation with the U.S. Department of Labor, should be responsible for developing the Industry-Recognized Apprenticeship program credential standards, as well as confirming that these standards are achieved through the work-based learning and related technical instruction requirements. Industry-based governing bodies should be able to influence or negotiate with employers and colleges to partner on transfer or credit agreements before verification of the credentialing standard.
- How will State Apprenticeship Agencies interact with the Industry-Recognized Apprenticeship programs, and can states distribute federally-funded, state administered grant funds to sponsors or participants in the Industry-Recognized Apprenticeship system?
 - The U.S. Department of Labor should clarify whether training funds are available for the Industry-Recognized Apprenticeship programs and, if training funds will be available, how these training dollars will be distributed to credentialing bodies. Given that the new Industry-Recognized Apprenticeship programs should require consistency in credentialing standards within industry sectors and uniform reporting requirements at the state and federal levels, states should be able to distribute federally-funded, state-administered grant funds, consistent with funding guidance.

Reporting Requirements

- What systems will the U.S. Department of Labor put in place to collect and verify outcomes data for Industry-Recognized Apprenticeship programs?
 - The new Industry-Recognized Apprenticeship system should have a single reporting platform that is utilized at both the state and federal levels. Funding may need to be available for state efforts to align to the Department's designed reporting platform.

Certification Process

There are several process-related questions that will need to be answered once the scope of the Industry-Recognized Apprenticeship system is finalized. Among these questions are the following:

- How will the U.S. Department of Labor differentiate between high/low quality certifiers, especially since no potential certifiers will have prior experience administering an Industry-Recognized Apprenticeship program?
- How often will certifiers be reviewed, and under what conditions would the positive recommendation be removed?
- What does it mean for a certifier to be “recommended” by the Department?
- How will the Department differentiate between high value and low value credentials?
- What constitutes “sufficient support and input from sector participants” for potential Industry-Recognized Apprenticeship program certifiers?

In its deliberations on ways to expand apprenticeships in the United States, the members of the Subcommittee on Administrative and Regulatory Strategies also discussed several administrative reforms and changes that could be made to the Registered Apprenticeship system that would also expand apprenticeship utilization in the U.S. The specific reforms discussed by the subcommittee included changes to the Workforce Innovation and Opportunity Act, the Employee Retirement Income Security Act of 1974, and wage and hour laws. Among these recommendations are the following:

- WIOA should include waivers/set-asides to make it easier for sponsors to receive WIOA funding, allowing sponsors to serve incumbent workers moving up the career ladder.
- WIOA outcome measures must take into account that apprentices are employed from start of programs, so pre- and post-program earnings may appear to be smaller than for other programs designed to serve those unemployed until their program is over.
- WIOA outcome measures must recognize that apprenticeships take longer to complete, and persistence in an apprenticeship program, earning credentials and moving through wage progression schedules should serve as positive interim outcomes.
- Reform wage and hour rules to allow apprentices under 18 to work on the manufacturing floor, use hoists and lifts in healthcare settings, use power tools and equipment, etc. when properly supervised – only in non-high-risk occupations. Since apprentices are paid a wage, they are prohibited from participating in these activities.