

TRAINING AND EMPLOYMENT NOTICE	NO. 10-22
	DATE December 6, 2022

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE DEVELOPMENT BOARDS
ALL AMERICAN JOB CENTER PROGRAMS

FROM: BRENT PARTON 
Acting Assistant Secretary

SUBJECT: Joint Communication on Guidance to States on Addressing the Workforce Needs and Safety of the Telecommunications Industry

1. **Purpose.** To announce a joint communication from Department of Labor’s (Department) Employment and Training Administration (ETA) and the Federal Communications Commission (FCC) on the workforce development opportunities associated with additional broadband and wireless telecommunications investment.
2. **Action Requested.** ETA encourages workforce grantees to work with state broadband organizations and public utility commissions to support the creation of good jobs in the telecommunications industry.
3. **Summary and Background.**
 - a. Summary – Recent and upcoming investment in the broadband and telecommunications industry creates significant opportunities to create good jobs that attract workers from across the country, including from underserved communities, which are adversely affected by persistent poverty, discrimination, or inequality. Workforce development boards and workforce grantees play a role in fostering opportunities to recruit and retain workers for good jobs created in the telecommunications industry.
 - b. Background –The telecommunications industry provides access to critical communications tools for people across the country. The Infrastructure Investment and Jobs Act (IIJA) provides important support for the development of additional broadband and wireless telecommunications investment alike. The National Telecommunications and Information Administration will administer \$48.2 billion through the [Broadband Equity, Access, and Deployment \(BEAD\) Program](#), the [Tribal Broadband Connectivity Program](#), the [Digital Equity Act Programs](#), and the [Enabling Middle Mile Infrastructure Program](#). In addition, the FCC will administer \$14.42 billion for the [Affordable Connectivity Program](#), and the U.S. Department of Agriculture will administer \$2 billion via the [Rural Utilities Services](#). The IIJA directs the Secretary of Labor, in partnership with the Chair of the FCC, to establish and issue guidance on how States can address the

workforce needs and safety of the telecommunications industry. Consistent with this directive, ETA and the FCC are issuing the attached joint communication to promote coordination from state and local government systems to increase availability of good jobs in the telecommunications industry.

4. **Highlights from the Joint Communication.** The joint communication suggests four key strategies to address the workforce needs and safety of the telecommunications industry:
 - a. Leveraging good jobs to recruit workers and retain them for the future.
 - b. Partnering with State Workforce Development Boards and workforce organizations to fill good jobs.
 - c. Promoting and improving recruitment in workforce development programs.
 - d. Ensuring the safety of the telecommunications workforce, including tower climbers.
5. **Inquiries.** For further information, please contact your Federal Project Officer (FPO).
6. **References.**
 - The Infrastructure Investment and Jobs Act, Pub. L. 117-58, 135 Stat. 429 (Nov. 15, 2021) <https://www.govinfo.gov/app/details/PLAW-117publ58/summary>
 - Training and Employment Notice 08-22, *Building Pathways to Infrastructure Careers: Framework for Preparing an Infrastructure Workforce*, published Oct. 21, 2022 <https://www.dol.gov/agencies/eta/advisories/ten-08-22>
7. **Attachments.**
 - *Guidance to States on Addressing the Workforce Needs and Safety of the Telecommunications Industry*

Guidance to States on Addressing the Workforce Needs and Safety of the Telecommunications Industry

U.S. Department of Labor & Federal Communications Commission

December 5, 2022

Introduction

The telecommunications industry provides access to critical communications tools for people across the country. The Infrastructure Investment and Jobs Act, Pub. L. 117-58, 135 Stat. 429 (Nov. 15, 2021) (“Infrastructure Investment and Jobs Act” or “IIJA”), provides important support for the development of additional broadband and wireless telecommunications investment alike. (See Infrastructure Investment and Jobs Act, 135 Stat. at 1182-1250 (codified at 47 U.S.C. §§ 344, 1301, 1305, 1701 et seq.)

The [Infrastructure Investment and Jobs Act](#) invests in broadband “to help ensure that every American has access to reliable high-speed internet through a historic investment in broadband infrastructure deployment.”¹ The National Telecommunications and Information Administration will administer \$48.2 billion through the [Tribal Broadband Connectivity Program](#), the [Digital Equity Act Programs](#), and the [Enabling Middle Mile Infrastructure Program](#). In addition, the Federal Communications Commission (FCC) will administer \$14.42 billion for the [Affordable Connectivity Program](#), and the U.S. Department of Agriculture (USDA) will administer \$2 billion via the [Rural Utilities Services](#).

The CHIPS and Science Act provides additional support to bolster telecommunications supply chains, including \$1.5 billion to facilitate the development of Open Radio Access Networks (Open RAN) and investing in science, technology, education, and mathematics (STEM) and workforce development for high-skilled good union jobs.

These investments provide significant opportunities to create good jobs that attract workers from across the country, including from underserved communities, which are adversely affected by persistent poverty, discrimination, or inequality, including Black, Indigenous, people of color; LGBTQ+ individuals; women; immigrants; veterans; individuals with disabilities; individuals in rural communities; individuals without a college degree; individuals with or recovering from substance use disorder; opportunity youth; and justice-involved individuals.

In recognition of the importance of recruiting and retaining workers for the good jobs created in the telecommunications industry, Section 60603 of IIJA directs the Secretary of Labor,

“in partnership with the Chair of the Federal Communications Commission, to establish and issue guidance on how States can address the workforce needs and safety of the telecommunications industry, including guidance on how a State workforce development board established under section 101 of the Workforce Innovation and Opportunity Act (29 U.S.C. § 3111) can--

¹ <https://www.whitehouse.gov/briefing-room/statements-releases/2021/11/06/fact-sheet-the-bipartisan-infrastructure-deal/>

- (1) utilize Federal resources available to States to meet the workforce needs of the telecommunications industry;
- (2) promote and improve recruitment in workforce development programs in the telecommunications industry; and
- (3) ensure the safety of the telecommunications workforce, including tower climbers.”

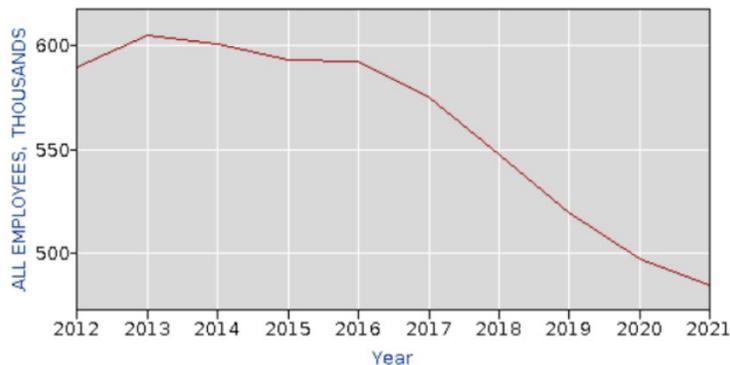
The Department of Labor (Department or DOL) and the FCC are providing this guidance to state workforce boards, as well as local workforce boards, Occupational Safety and Health Administration (OSHA)-approved State Plans, state broadband organizations, state public utilities commissions, and governors’ offices, to help them support the creation of good jobs in this industry. This document covers four key strategies:

- (1) Leveraging Good Jobs to Recruit Workers (Including Workers Who Previously Exited the Industry) – and Retain Them for the Future
- (2) Partnering with State Workforce Development Boards and Workforce Organizations to Fill Good Jobs
- (3) Promoting and Improving Recruitment in Workforce Development Programs
- (4) Ensuring the Safety of the Telecommunications Workforce, Including Tower Climbers

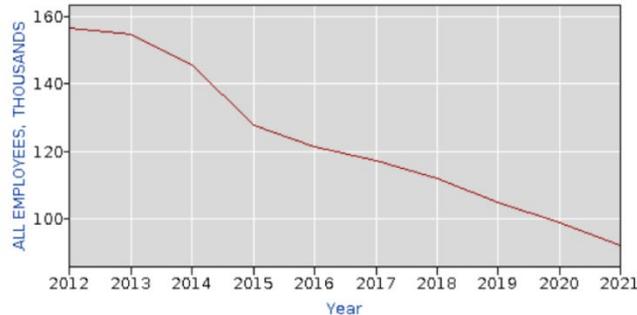
Leveraging Good Jobs to Recruit Workers – and Retain Them for the Future

Data produced by the Bureau of Labor Statistics indicate that the number of workers in the telecommunications industry has declined in recent years, including a 19.9% decline among Wired Telecommunications Carriers and 40.3% decline among Wireless Telecommunications Carriers (except satellite) since 2012.

Series Id: CEU5051731101
 Not Seasonally Adjusted
Series Title: All employees, thousands, wired telecommunications carriers, not seasonally adjusted
Super Sector: Information
Industry: Wired telecommunications carriers
NAICS Code: 517311
Data Type: ALL EMPLOYEES, THOUSANDS



Series Id: CEU5051731201
Not Seasonally Adjusted
Series Title: All employees, thousands, wireless telecommunications carriers, except satellite, not seasonally adjusted
Super Sector: Information
Industry: Wireless telecommunications carriers, except satellite
NAICS Code: 517312
Data Type: ALL EMPLOYEES, THOUSANDS



This decline comes despite increased federal investment in related industries, including tens of billions of dollars from [the Universal Service Fund](#) into build-out efforts in the first half of the 2010s. Building the significant new investments promised by the IJIA will require reversing this decline and bringing additional workers into the telecommunications workforce.

Given that context, creating *good jobs* is a key strategy for recruiting (including re-hiring) and retaining workers, especially in a competitive labor market. Workers know the value of a good job that provides stability and security for themselves and their families. Good jobs are the foundation of an equitable economy that lifts up workers and families and makes businesses more competitive globally. They allow everyone to share in prosperity and support local communities and the entire U.S. economy. Meanwhile, employers recognize that providing good-quality jobs – that make them an employer of choice – creates a clear competitive advantage when it comes to recruitment, retention, and execution of a company's mission.

The Departments of Commerce and Labor have recently partnered to identify key elements of what can comprise a good job. These eight principles create a framework for workers, businesses, labor unions, advocates, researchers, state and local governments, and federal agencies for a shared vision of job quality in the telecommunications industry and beyond. These [Good Jobs Principles](#) include:

- **Recruitment and Hiring:** Qualified applicants are actively recruited – especially those from underserved communities. Applicants are free from discrimination, including unequal treatment or application of selection criteria that are unrelated to job performance. Applicants are evaluated with relevant skills-based requirements. Unnecessary educational, credentials, and experience requirements are minimized.
- **Benefits:** Full-time and part-time workers are provided family-sustaining benefits that promote economic security and mobility. These include health insurance, a retirement plan, workers' compensation benefits, work-family benefits such as paid leave and caregiving supports, and others that may arise from engagement with workers. Workers are empowered and encouraged to use these benefits.

- **Diversity, Equity, Inclusion, and Accessibility (DEIA):** All workers have equal opportunity. Workers are respected, empowered, and treated fairly. DEIA is a core value and practiced norm in the workplace. Individuals from underserved communities do not face systemic barriers in the workplace.
- **Empowerment and Representation:** Workers can form and join unions. Workers can engage in protected, concerted activity without fear of retaliation. Workers contribute to decisions about their work, how it is performed, and organizational direction.
- **Job Security and Working Conditions:** Workers have a safe, healthy, and accessible workplace, built on input from workers and their representatives. Workers have job security without arbitrary or discriminatory discipline or dismissal. They have adequate hours and predictable schedules. The use of electronic monitoring, data, and algorithms is transparent, equitable, and carefully deployed with input from workers. Workers are free from harassment, discrimination, and retaliation at work. Workers are properly classified under applicable laws. Temporary or contractor labor solutions are minimized.
- **Organizational Culture:** All workers belong, are valued, contribute meaningfully to the organization, and are engaged and respected, especially by leadership.
- **Pay:** All workers are paid a stable and predictable living wage before overtime, tips, and commissions. Workers' pay is fair, transparent, and equitable. Workers' wages increase with increased skills and experience.
- **Skills and Career Advancement:** Workers have equitable opportunities and tools to progress to future good jobs within their organizations or outside them. Workers have transparent promotion or advancement opportunities. Workers have access to quality employer- or labor-management-provided training and education.

Many jobs in the telecommunications industry reflect some or all of these principles. State agencies should consider engaging with telecommunications industry employers and labor unions to help them assess steps that they can take to improve the quality of their jobs and then publicize those efforts. More information can be found at the Department's website at <https://www.dol.gov/general/good-jobs/principles>.

Federal agencies have embraced strong labor and equity standards in telecommunications workforce grants in part to promote the effective and efficient completion of high-quality broadband infrastructure projects by ensuring a reliable supply of skilled, diverse workers and minimizing disruptive and costly delays. For example, the Department of Commerce's National Telecommunications and Information Administration released a [Notice of Funding Opportunities](#) in 2022 requiring eligible entities to give priority to projects based on a demonstrated record of – and plans to be in compliance with – federal labor and employment laws. That includes both collecting information on compliance with federal labor and employment laws and requiring submission of plans for grantees' compliance with labor and employment laws, and their contractors' and subcontractors' compliance with the same. Those plans must (a) include information on wage scales and overtime payment practices, and (b) ensure the

implementation of workplace safety committees authorized to raise health and safety concerns in connection with the delivery of deployment projects. Other “effective plans” for compliance with federal labor and employment laws can include binding commitments to strong labor standards through the grantees’, contractors’, and subcontractors’ workforces, including:

- Using a directly employed workforce, as opposed to a subcontracted workforce;
- Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable, and collecting the required certified payrolls;
- Using project labor agreements (i.e., pre-hire collective bargaining agreements between unions and contractors that govern terms and conditions of employment for all workers on a construction project);
- Use of local hire provisions;
- Commitments to union neutrality;
- Use of labor peace agreements;
- Use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded);
- Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure);
- Plans to create equitable on-ramps into industry jobs including engagement and partnership with relevant stakeholders;
- Plans for effective outreach to populations that have been traditionally underrepresented in industry jobs, and
- Taking steps to prevent the misclassification of workers.

When states consider job opportunities in the telecommunications industry, it is important to include positions with job growth beyond individual projects. The Pew Charitable Trusts’ [Broadband Education and Training Initiative](#) discussed that telecommunications industry jobs range from securing permits and network engineering to marketing and digital literacy efforts. The positions required to fulfill these activities can range from line technicians and fiber splicers to network administrators and digital navigators. When states are planning telecommunications projects, it is helpful to consider the entire lifecycle of connectivity, which will help to both estimate the number of employees and identify the specific skills that will be required.

It is also important to promote the development of skills and capabilities to support future workforce needs as the telecommunications sector continues to evolve. Investment in this workforce, including education and training opportunities, should account for such shifts. For example, bandwidth-heavy activities such as remote learning and videoconferencing have grown dramatically in recent years, a trend that is likely to continue. Telecommunications companies expect an increase in migration to cloud-based functionalities to support these trends. Telecommunications jobs supporting cloud-based applications and network virtualization are areas of job growth with long-term career paths.

A range of telecommunications occupations, their average wages, and employment projections are available from the [Occupational Employment and Wage Statistics](#) and from the Bureau of Labor Statistics. Career counselors can also guide individual jobseekers on specific occupations with

information such as wages, employment openings, and required education or training from www.MyNextMove.org, a DOL-sponsored interactive tool for job seekers and students to learn more about their career options, based on the mix of knowledge, skills, and abilities required for each occupation, and its relevant activities and tasks. States can track and improve their efforts by collecting aggregate/summary data and reporting on the demographics of the workforce trained or working in the telecommunications industry.

One area of significant job growth is in the field of cybersecurity, which is imperative to help ensure the security, reliability, and interoperability of the nation's communications system. As the United States deploys next generation broadband systems, cybersecurity experts will work to protect our networks from vulnerabilities and threats. Another long-term growth opportunity involves the Open RAN environment, which is the general disaggregation of radio access network functionality built using open interface specifications between elements instead of proprietary specification. As Open RAN becomes commonplace, given the [\\$1.5 billion investment in the CHIPS and Science Act](#), more vendors will compete to build subcomponents of radio access networks based on open interfaces and community-developed standards, providing a flexible and interoperable deployment architecture across multiple vendors. As a result, there will be a greater need for telecommunications installers, maintenance workers, software developers, cybersecurity, and hardware security experts. This increased demand will help increase the value and compensation for such jobs, which would aid in recruiting and retaining workers for such positions.

Partnering with Workforce Development Boards to Fill Good Jobs

State and local Workforce Development Boards (WDBs) drive the vision for the workforce system at the state and local levels and maintain the critical role of leading and guiding states' implementation of the Workforce Innovation and Opportunity Act (WIOA). WDBs are business-led and work together to support regional collaboration within economic development areas and ensure that career pathways, sector strategies, and expansion of apprenticeships and other earn-and-learn career training approaches address the needs of business in diverse industries. WDBs are critical in promoting, sustaining, and growing regional economies in partnership with the workforce system.

WDBs can be an important partner in helping to meet the workforce needs of the telecommunications industry by promoting job quality, equitable recruitment, and engaging in sector strategies along with education and training organizations. WDBs should consider partnering with the telecommunications industry and labor unions as they administer workforce development programs funded by the DOL, so they can support recruitment, education, and job training in the telecommunications industry, and in addition, can help to recruit workers in communities with employment opportunities.

Key Programs, Strategies, and Resources

Following are key resources to help partner with WDBs to fill good jobs:

1. Registered Apprenticeship – Design or expand pre-apprenticeship and Registered Apprenticeships in the telecommunications industry

Registered Apprenticeship is an industry-driven, high-quality career pathway validated by the U.S. Department of Labor where employers can develop and prepare their future workforce, and individuals can obtain paid work experience, classroom instruction, and a portable, nationally recognized credential. Registered Apprenticeship Programs (RAPs) are formally approved by either the DOL's Office of Apprenticeship or a State Apprenticeship Agency (SAA) to ensure that they meet specific criteria in order to protect apprentices and maintain program quality. Registration also enables employers to seek no-cost technical assistance, federal grants, and tax credits in [certain states](#).

In 2020 there were 3,654 registered apprentices in telecommunications occupations, increasing over 300% in the last nine years. States have a unique opportunity to facilitate partnerships with the telecommunications industry to scale RAPs in the telecommunications industry.

Since 2016, the Office of Apprenticeship has funded a wide range of industry intermediaries to expand apprenticeship into new industries. Registered Apprenticeship Industry Intermediaries offer expertise to help employers and labor organizations successfully launch, promote, and expand RAPs in growing industries. These partners are uniquely positioned to convene employers within a specific industry or sub-sector to increase awareness of the Registered Apprenticeship model and assist in the creation of RAPs.

States can partner with [telecommunications intermediaries](#), including industry groups and labor unions, to develop and scale apprenticeships in the telecommunications industry. States can identify, develop, and scale pre-apprenticeship programs that lead to Registered Apprenticeships. States can convene telecommunications employers to discuss and explore RAPs and better understand challenges in the industry specific to their states. Furthermore, states can invest and incentivize partnerships through career and technical education programs and community college programs that equip individuals with related technical education and provide supportive services (such as child care, transportation, mentorship, etc.) for individuals in telecommunications pre-apprenticeships or Registered Apprenticeships.

In particular, states can partner with industry and labor to develop pre-apprenticeship programs and career pathways to facilitate the development of RA programs, in particular in wireline/fiber efforts where there were previously limited programs and pathways. There is also an opportunity to facilitate industry and labor to work on common standards for workers to be cross-trained in wireless and wireline work, not to mention maintenance efforts. These baseline standards can help ensure RAs lead to good jobs. The Department provides additional resources and comprehensive information for employers on Registered Apprenticeships on [Apprenticeship.gov](#).

2. Job Corps – Promote and facilitate partnerships with Job Corps

Job Corps – funded by WIOA – is the nation’s largest free residential career training program. Job Corps has 121 centers nationwide, with 24 of those centers operated by the U.S. Department of Agriculture’s Forest Service and the remainder operated by DOL. For over 50 years, Job Corps has provided career technical training, personal and career counseling, employment placement services, residential living, and other support services to eligible youth ages 16 through 24, including justice-involved youth, young parents, refugees, housing insecure youth, and youth with disabilities. Through Job Corps, students receive assistance completing their high school education and connecting to meaningful careers and employment. Job Corps has trained and educated over three million individuals since 1964.

Workforce Boards have a unique opportunity to partner with Job Corps to address the workforce needs of the telecommunications industry. States can convene industry employers and labor in their region to connect telecommunications employers with Job Corps Centers. In connecting employers with Job Corps Centers, states can facilitate partnerships with employers and labor, expand work-based learning opportunities between the telecommunications industry and Job Corps students, and expand internships, on-the-job training, and pre-apprenticeships for students. Further, these partnerships can also increase students' awareness of the telecommunications industry and the myriad of career opportunities in the industry.

3. Targeted Populations: Design strategies to connect dislocated, unemployed, and underemployed workers and other populations experiencing job losses to access education and training and transition into the telecommunications industry

State and local workforce boards are uniquely positioned to design strategies and use funding to connect dislocated workers and unemployed or underemployed populations to careers and opportunities in the telecommunications industry. Designing such strategies will require coordination, partnerships, and strong alignment with the publicly funded workforce system and industry. Career services include job-search and job-placement assistance, access to labor market information such as in-demand occupations in the telecommunications industry, career counseling and mentoring, comprehensive assessment of an individual’s employability, and development of an individual employment plan. Occupational training linked to local job opportunities and supportive services such as child care and transportation may also be made available.

A variety of career and training services are available via the network of nearly 2,400 [American Job Centers \(AJC\)](#). AJCs are designed to provide a full range of assistance to job seekers under one roof. AJCs offer training referrals, career counseling, job listings, and similar employment-related services. Customers can visit a center in person or connect to the center's information online or through kiosk remote access. There are several programs administered by DOL that are delivered through the AJCs. States and Workforce Boards can consider these programs and resources to connect various populations to the telecommunications industry.

- **Wagner-Peyser Act Employment Service** - This program provides a variety of employment-related labor exchange services to all workforce system customers, including job search assistance, job referral and placement assistance for job seekers, re-employment services to unemployment insurance claimants, and recruitment services to employers with job openings. The services offered to employers include assistance in developing job order requirements; matching job seeker experience with job requirements, skills, and other attributes; assisting employers with special recruitment needs; arranging for job fairs; helping employers analyze

hard to-fill job orders; assisting with job restructuring; and aiding employers engaged with layoffs.

- **WIOA Adult Program** - The Adult program serves individuals and helps employers meet their workforce needs. It enables workers to obtain good jobs by providing them with job search assistance and training opportunities. WIOA establishes a priority requirement with respect to funds allocated to a local area for adult employment and training activities. AJC staff, when using WIOA Adult funds to provide individualized career services and training services, must give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient (including English language learners). Under WIOA, priority must be implemented regardless of the amount of funds available to provide services in the local area. In addition, veterans receive priority of service in all DOL-funded employment programs.
- **Dislocated Worker Programs** - The Dislocated Worker formula program funds career and training services for eligible dislocated workers through the AJC system. National Dislocated Worker Grants (DWGs) can temporarily expand this capacity by providing additional funding assistance in response to large, unexpected economic events which cause significant job losses. This funding is intended to temporarily expand capacity to serve dislocated workers, including military service members, and meet the increased demand for WIOA employment and training services, with a purpose to reemploy laid off workers and enhance their employability and earnings.

Telecommunications employers aiming to expand their recruitment can partner with grantees dedicated to increasing employment. Three potential competitive grantees that partner with businesses include:

- **Workforce Opportunity for Rural Communities (WORC) Grants** - The WORC initiative is designed to facilitate the alignment of workforce development efforts with existing economic development strategies in rural communities in the Appalachian, Delta, and Northern Border regions hard hit by economic transition and recovering slowly. WORC provides grant funds to enable impacted communities to develop local and regional workforce development solutions aligned with existing economic development strategies and community partnerships to promote new, sustainable job opportunities and long-term economic vitality. These grants support workforce development activities that prepare dislocated workers, new entrants to the workforce, and incumbent workers for good jobs in high-demand occupations aligned with a regional or community economic development strategy. WORC grantees are listed at <https://www.dol.gov/agencies/eta/dislocated-workers/grants/workforce-opportunity>.
- **Reentry Employment Opportunities (REO)** - The REO program provides funding for justice-involved youth and young adults and formerly-incarcerated adults. In addition to providing employment services, training, and comprehensive support services, the program's goal is to develop strategies and partnerships that facilitate the implementation of successful programs at the state and local levels that will improve the workforce outcomes for this population. Reentry grantees are listed at <https://www.dol.gov/agencies/eta/reentry/grantees>.
- **YouthBuild** - YouthBuild is a community-based pre-apprenticeship program that provides job training and educational opportunities for opportunity youth ages 16-24 who have previously dropped out of high school. Youth learn vocational skills in construction, as well as in other in-demand industries that include information technology. Youth split their time between the vocational training work site and the classroom, where they earn their high school diploma or

equivalency degree, learn to be community leaders, and prepare for postsecondary training opportunities, including college, apprenticeships, and employment. YouthBuild grantees are listed at <https://www.dol.gov/agencies/eta/youth/youthbuild>.

4. WIOA Governors' Reserve – Consider Governors' Reserve funding to develop workforce training programs, activities, and projects in the telecommunications industry

WIOA allows states to reserve a portion of the Adult, Dislocated Worker, and Youth funding streams to conduct both required and allowable statewide activities. These funds are also commonly called the Governors' Reserve funds. Once a state has met its obligation to fund the required activities, it has wide discretion to invest the Governors' reserve funds in projects or activities it deems fit. These investments could include, for example, grants or projects to develop the workforce for the telecommunications industry. Below are some non-exclusive examples of allowable uses of the statewide funds that align with workforce training in the telecommunications industry.

Allowable statewide employment and training activities may include:

- Developing and implementing innovative programs and strategies designed to meet the needs of all employers (including small employers) in the State, including the programs and strategies referenced in WIOA sec. 134(a)(3)(A)(i);
- Developing strategies for serving individuals with barriers to employment, and for coordinating programs and services provided at [American Jobs Centers](#);
- Developing or identifying education and training programs that have the characteristics referenced in WIOA sec. 134(a)(3)(A)(iii);
- Conducting research and demonstrations related to meeting the employment and education needs of youth, adults, and dislocated workers;
- Supporting the development of evidence-based programs and other activities that enhance the choices available to eligible youth and which encourage youth to reenter and complete secondary education, enroll in postsecondary education and advanced training, progress through a career pathway, and enter into unsubsidized employment that leads to economic self-sufficiency;
- Supporting the provision of career services in the system of American Jobs Centers in the State as described in secs. 129(b)(2)(C) and 134(c)(2) of WIOA and [its implementing regulations](#);
- Providing incentive grants to local areas for their performance on local performance accountability measures;
- Carrying out activities to facilitate remote access to training services provided through the system of American Jobs Centers;
- Developing and disseminating workforce and labor market information; or
- Implementing promising practices for workers and businesses as described in WIOA sec. 134(a)(3)(A)(x).

Promoting and Improving Recruitment in Workforce Development Programs

State and local workforce boards can also help telecommunications employers partner with

communities and workers who may be underrepresented in the industry. In particular, they can connect telecommunications employers to underserved communities. The Department has policies and partners that support these partnerships through various strategies and initiatives.

For example, a common strategy that should be considered to promote and improve recruitment in telecommunications workforce development is pre-apprenticeship. [Pre-apprenticeship](#) is a program or set of strategies designed to prepare individuals for entry into Registered Apprenticeship Programs (RAPs, discussed above) or other job opportunities. Pre-apprenticeships promote and improve recruitment in workforce development programs by providing individuals opportunities to develop skills and obtain some pre-qualifications through education and work-based learning to improve their work skills and success. Pre-apprenticeships have been shown to improve the recruitment of underrepresented and diverse populations. The Department provides guidance on developing quality pre-apprenticeship program in its [TEN 13-12](#), including articulating the elements of a quality pre-apprenticeship. Quality pre-apprenticeships incorporate approved training and curriculum, strategies for long-term success such as mentoring, and access to supportive services such as child care and transportation. They promote greater use of Registered Apprenticeships, provide meaningful hands-on training that does not displace paid employees, and facilitate entry or articulation into Registered Apprenticeship programs.

Recruiting Women

The US Department of Labor's Women's Bureau (WB) champions policies and standards that safeguard the interests of working women, advocates for the equality and economic security of women and their families, and promotes quality work environments. WB has helpful resources for increasing women in the telecommunications industry, including:

- The [Women in Apprenticeship and Nontraditional Occupations \(WANTO\)](#) grant helps to expand pathways for women to enter and lead in all industries. This funding provides grants to attract and keep women in Registered Apprenticeship Programs and industries where they are underrepresented, including telecommunications as well as manufacturing, infrastructure, cybersecurity, and healthcare. Organizations receiving funds provide one or more of the following types of technical assistance:
 - o Developing pre-apprenticeship or nontraditional skills training programs to prepare women for those careers;
 - o Providing ongoing orientation for employers, unions, and workers on creating a successful environment for women to succeed in those careers; and
 - o Setting up support groups, facilitating networks, or providing support services for women to improve their retention.
- Consistent with the Department's focus on increasing access to Registered Apprenticeships for all workers, the Women's Bureau (WB) published "[Advancing Opportunities for Women through Apprenticeship: A Case-Based Resource Guide](#)," which provides a framework for meaningful expansion of apprenticeship programs for women. The guide includes case studies on four high-quality, women-inclusive pre-apprenticeship and apprenticeship programs in a range of industry sectors. Before the case studies, the guide identifies common strategies across the four programs to help others learn how to create programs that successfully open pathways to in-demand jobs for women through apprenticeships.

- The [Fostering Access, Rights and Equity \(FARE\)](#) grant program helps women workers who earn low wages learn about and access their employment rights and benefits. FARE grants are designed to support non-profit organizations that connect women workers to additional services, benefits, and legal assistance, and could be sought by programs building opportunities in the telecommunications industry. FARE grant recipients conduct the following activities:
 - o Provide outreach to women who are paid low wages at work and are otherwise marginalized and underserved.
 - o Share educational materials through various platforms, including social media, in-person or virtual events, brochures and leaflets, and one-on-one consultations.
 - o Assist women workers with navigating and calculating benefits.
 - o Connect and refer women workers to additional services, benefits, and/or legal assistance as needed, reasonable, and/or available.
 - o Help women to become focal points for rights, benefits, and assistance in their own communities (i.e., a train-the-trainer model for navigation).

Recruiting Workers with Disabilities

The US Department of Labor’s Office of Disability Employment Policy (ODEP) is the only non-regulatory federal agency that promotes policies and coordinates with employers and all levels of government to increase workplace success for people with disabilities. ODEP has resources to assist employers in identifying and hiring workers with disabilities, including:

- Through its [Partnership on Inclusive Apprenticeships \(PIA\)](#) initiative, ODEP works with its federal and private sector partners to ensure that apprenticeship programs are accessible and available to all qualified individuals, including those with disabilities. This work specifically targets Registered Apprenticeship (RA) programs in high-growth, high-demand sectors, including telecommunications. PIA has developed a [guide](#) for recruiting and training apprentices with disabilities.
- The [Job Accommodation Network \(JAN\)](#), a service provided by ODEP, is the leading source of free, expert, and confidential guidance on workplace accommodations and disability employment issues. Those who benefit from JAN's services include private employers of all sizes, government agencies, employee representatives, service providers, and people with disabilities and their families.
- The [Employer Assistance and Resource Network on Disability Inclusion \(EARN\)](#), also funded by ODEP, is a technical assistance center that helps employers tap into the talents of employees with disabilities by building inclusive workplace cultures. EARN has developed a [full range of recruitment resources](#), including HR checklists, best practices, sample job descriptions, and recommended ways of finding qualified candidates.
- The [Workforce Recruitment Program \(WRP\)](#) is a recruitment and referral program that connects federal and private-sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to demonstrate their abilities in the workplace through summer or permanent jobs. Included within the WRP website, is a WRP Schedule A hiring database, which houses resumes of qualified Schedule A candidates and veterans.

Recruiting Veterans

The US Department of Labor's Veterans' Employment and Training Service (VETS) administers programs that address the employment, training, and job security needs of 200,000 service members who transition to civilian life each year, 8.9 million military veterans, and nearly 800,000 National Guard and Reserve members. Veterans receive priority of service in all DOL-administered employment programs. This includes priority referrals to jobs and other employment and training services over non-veteran applicants with similar qualifications.

State workforce boards can work with VETS to leverage important resources to help hire veterans:

- The [Jobs for Veterans State Grants \(JVSG\)](#) program coordinates services with Wagner-Peyser and Workforce Innovation and Opportunity Act (WIOA), and other programs across each of the State Workforce Agencies. The JVSG provides funds to the SWA to hire dedicated staff to provide individualized career and training-related services to veterans and eligible persons with significant barriers to employment and to employers to fill their workforce needs with job-seeking veterans. The positions supported by JVSG funding include the Disabled Veterans' Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER).
- DVOP specialists provide individualized career services to veterans with significant barriers to employment, with the maximum emphasis directed toward serving veterans who are economically or educationally disadvantaged. Veterans with significant barriers to employment include veterans with service-connected disabilities, those experiencing homelessness, vocational rehabilitation clients, and other eligible veterans as determined by the Secretary of Labor or authorized by JVSG appropriations. Other eligible populations include:
 - Transitioning members of the Armed Forces who have been identified as in need of Individualized Career Services;
 - Members of the Armed Forces who are wounded, ill, or injured and receiving treatment in military treatment facilities or warrior transition units;
 - The spouses or other family caregivers of such wounded, ill, or injured members;
 - Veterans aged 18-24; and
 - Vietnam-era veterans.
- **LVER staff** promotes veteran hiring through outreach activities that build relationships with local employers to **connect employers and engage in advocacy efforts with hiring executives to increase employment opportunities for veterans** and encourage the hiring of veterans. LVERs serve as part of local Business Services Teams to enhance employers' awareness of the knowledge and skills veterans can bring to their organization.
- **Veterans Employment Outreach Program** – VETS continues a robust [Veterans Employment Outreach Program \(VEOP\)](#) to make it easier for employers to find, hire, train, and retain veterans by leveraging Federal, state, and local resources.
- **DOL Regional Veterans' Employment Coordinators (RVEC)**. RVECs engage with local, regional, and national employers and connect them with Federal, state, and local resources to facilitate veterans' employment. <https://www.dol.gov/agencies/vets/employers/rvec>

- By becoming “[Approved for GI Bill](#),” an organization’s Registered Apprenticeship program can assist current and future veteran apprentices apply the benefits they have earned. Veterans who have existing benefits under the GI Bill may qualify for a monthly stipend – paid by the U.S. Department of Veterans Affairs (VA) – in addition to the wages they receive through an apprenticeship. Approved employers can use this benefit as a recruiting tool. More Apprenticeship resources for veterans are [available on the Department’s website](#).
- **U.S. Department of Defense [SkillBridge program](#)** is another resource employers can leverage to gain access to Transitioning Service Members.
 - Through the SkillBridge program industry partners benefit from gaining early access to the extensive experience, skills, and unmatched work ethos Service members bring to the workforce. Employers craft SkillBridge programs to meet their specific workforce needs, matching those needs to the skills and abilities of highly motivated Service members, all at no cost.
 - The U.S. Department of Defense pays Service member salary and benefits while the Service member participates in SkillBridge. This opportunity may last up to the final 180-days of service. Military installation Commanders can make on-base facilities available to industry partners for use in their SkillBridge programs, or members may be authorized to train at the industry partner's location off installation at minimal to no cost.
<https://www.dol.gov/agencies/vets/employers/rvec>

Ensuring the Safety of the Telecommunications Workforce, Including Tower Climbers and Broadband Workers

State and local workforce boards can also help telecommunications employers and workers understand the importance of worker safety. The Department’s Occupational Safety and Health Administration (OSHA) ensures safe and healthful working conditions for workers by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA affirms the need for effective worker and workplace safety and health protections for the telecommunications industry, including the construction and maintenance of communication towers and broadband infrastructure. The agency has numerous resources available to support state and local agencies, employers, workers, and other stakeholders.

Safety and Health Management Systems

Safety and health management systems are key to worker safety. OSHA specifically requires that employers create and implement a Safety and Health Program providing for worker protections when conducting construction activities. [Key elements](#) of successful Safety and Health Programs include management leadership, worker participation, hazard identification and assessment, hazard prevention and control, education and training, program evaluation and improvement, and communication and coordination between host employers, contractors, and staffing agencies. In addition, OSHA has specific

and general requirements for the safe construction of buildings, roadways, and other types of construction, including communication towers and the construction of broadband systems. As part of this initiative, OSHA will continue to provide information on how employers can create, implement, and utilize a Safety and Health Management System through our Federal and State programs nationwide.

Enforcement and Compliance Assistance

Through inspections, the Department of Labor will enforce safe worksites for all. In addition, compliance assistance information will be provided online and through OSHA's offices in both Federal and State locations. The IJA allocates significant funding for broadband and telecommunications tower infrastructure projects and OSHA will ensure that operations where communication towers and broadband systems are being constructed will have compliance assistance resources available to them and that OSHA enforcement will also focus on these activities. OSHA and our partners in each state offer free OSHA Consultation for smaller employers to help them set up their own safety programs, and OSHA has been providing funding for consultation services for the Telecommunications industry, specifically in the tower industry for years. The agency will also focus on the broadband construction hazards related to cable and antenna installation and other construction activities through boring cables underground as well. Ensuring that contractors have the safety and health controls in place for the hazards faced by their employees before the work begins is important to worker safety. OSHA compliance assistance and cooperative programs in the field such as consultation or partnerships in addition to online resources provided by the agency and the Department will help to fill the industry's safety needs. The agency is also asking stakeholder groups including labor organizations and unions to assist the industry in this endeavor.

Focus Four Hazards

Construction activities in the telecommunications sector will be affected by the focus four hazards – falls, electrocutions, struck-by, and caught between hazards – which lead to over 60% of all construction fatal incidents. The Department's goal is to provide information which will orient the construction sector, particularly to highlight these hazards, among others when they are working in the telecommunications industry. Falls from height and struck-by hazards have contributed significantly to telecommunications tower fatal incidents. OSHA will continue to focus on these hazards and ensuring that controls are in place to prevent serious injuries and fatalities caused by these hazards. In all parts of this work, the agency will focus on the boring of cables and ensure that falls, struck-by, and electrical hazards are properly identified and controlled. OSHA is also creating an infrastructure safety web page for the industry highlighting four hazards, which page is targeted primarily for construction contractors and their workers.

Training of Workers

Training workers on the hazards of ongoing and future work operations is of utmost importance to worker safety. Through both federal and State Plans, OSHA is committed to providing information to enhance the importance of training. OSHA area offices and State Plan offices have or have access to compliance assistance staff to assist employers in complying with the applicable regulatory requirements, guidance, and good practices. In addition, OSHA Training Institute Education Centers are available to provide outreach training on hazards in the construction industry and other safety and

health topics, and OSHA's [Susan Harwood grantees](#) often provide free training. The Department will continue to focus robust efforts in our compliance assistance and training programs to assist employers in worker safety and health.

Special Circumstances

Tower climbing and other aspects of the telecommunications industry's construction activities require that workers be aware of weather conditions as they are working at heights. The physical demands of climbing to the work location are unique, whether on a tower, pole, or other location. The Department will focus on working with partner agencies and stakeholders to address these unique issues in this industry.

DOL - OSHA and other Resources for Contractors

The Department will focus on providing supportive resources for contractors who are undertaking work under the IJA and in the telecommunications industry. As part of this workforce initiative, DOL will share state, federal, and other partners resources that will provide information and tools on how to make their jobsites safer. OSHA is also creating a webpage that directly addresses worker safety on our agency website that is intended to be a one-stop resource for infrastructure activities, including the telecommunications industry. We are asking industry stakeholders for safety and health information that can be publicly shared on this site and expect significant participation.