

TRAINING AND EMPLOYMENT NOTICE	NO.
	DATE

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE APPRENTICESHIP AGENCY DIRECTORS
STATE WORKFORCE DEVELOPMENT BOARDS AND STAFF
LOCAL WORKFORCE DEVELOPMENT BOARDS AND STAFF
STATE APPRENTICESHIP AGENCIES
OFFICE OF APPRENTICESHIP (OA) STATE DIRECTORS
APPRENTICESHIP GRANT RECIPIENTS
H-1B SKILLS TRAINING GRANT PROGRAM RECIPIENTS
YOUTHBUILD PROGRAMS
JOB CORPS NATIONAL AND REGIONAL OFFICE STAFF
JOB CORPS CENTER OPERATORS AND DIRECTORS
FOREST SERVICE JOB CORPS CENTERS

FROM: BRENT PARTON /s/
Principal Deputy Assistant Secretary

SUBJECT: Quality Pre-Apprenticeship Programs

- Purpose.** The purpose of this Training and Employment Notice (TEN) is to: (i) describe the scope and characteristics of quality pre-apprenticeship programs in a manner that is consistent with the language of the Equal Employment Opportunity (EEO) in Apprenticeship Final Rule and the Workforce Innovation and Opportunity Act (WIOA) Final Rule; (ii) identify how pre-apprenticeship programs can increase access to Registered Apprenticeship Programs (RAPs) for all Americans, including those historically underrepresented and underserved in RAPs; and (iii) provide examples of quality pre-apprenticeship programs in diverse settings.

This TEN rescinds and replaces the Employment and Training Administration’s (ETA) previous guidance on pre-apprenticeship programs, TEN No. 13-12, *Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources*. While ETA’s Office of Apprenticeship (OA) does not directly oversee or regulate pre-apprenticeship programs, OA recommends the elements outlined in this TEN, as they facilitate subsequent success in a RAP. Additionally, while pre-apprenticeship programs are not subject to the EEO requirements of 29 CFR Part 30, which identifies specific actions for creating discrimination- and harassment-free apprenticeship processes and environments, incorporating the elements of that regulation into pre-apprenticeships may benefit RAP sponsors in meeting the applicable EEO requirements.

2. **Action Requested.** Stakeholders are requested to disseminate this information broadly to State and local workforce development areas and other workforce and secondary and postsecondary education partners to build broader understanding of pre-apprenticeship programs and their connection to RAPs.

3. **Summary and Background.**

a. Summary – Registered Apprenticeship is an effective "earn and learn" workforce development model with a long history of establishing career pathways in existing, new, and high-demand industries and sectors. In Fiscal Year (FY) 2022, more than 248,000 individuals nationwide entered the National Apprenticeship System. In the same year, 605,000 apprentices obtained the skills they need to succeed while earning the wages they need to build financial security in nearly 24,000 RAPs across the country. The average annual income of participants who successfully completed their apprenticeship was approximately \$80,000, and 90 percent of apprentices who complete an apprenticeship retain their employment.¹ These results demonstrate the advantages RAPs offer in providing a significant wage gain and clear career path for entry-level and incumbent workers and the value of the registered apprenticeship model in training a productive workforce for businesses.²

Despite this record of success, many Americans – particularly individuals from historically underserved or underrepresented populations such as women, communities of color, individuals with disabilities, justice-impacted individuals, youth (ages 16-24), and veterans – have faced significant barriers (e.g., limited English proficiency, lack of childcare and transportation services) to accessing RAPs. However, quality pre-apprenticeship programs can play a key role in removing these barriers and creating accessible pathways to RAPs and to rewarding careers.

In January 2021, President Biden issued two Executive Orders, (EO) 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (86 FR 7009), and EO 14091 *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, which emphasized the Federal Government’s commitment to programs and policies that advance equity, civil rights, racial justice, and equal opportunity. As part of this commitment, ETA is redoubling its efforts to promote pathways to prosperity for all American workers, particularly underrepresented and underserved populations.³

Underserved communities are populations that have been adversely affected by persistent poverty, discrimination, or inequality, including women; Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and

¹ [Homepage | https://www.apprenticeship.gov](https://www.apprenticeship.gov)

² Return on Investment Studies in the United States and other countries, available online at <https://apprenticeshipusa.workforcegps.org/resources/2017/08/29/12/43/Expanding-Apprenticeship-Return-on-Investment-ROI>. The Evaluation of the American Apprenticeship Initiative (AAI) comprises four sub-studies, one of which measures the returns to employers on their investments in apprenticeship programs.

³ An evaluation of the American Apprenticeship Initiative (AAI) grant program https://wdr.doleta.gov/research/FullText_Documents/ETAOP2021-23_AAI_Grant_Program_Description_Final.pdf.

other persons of color; members of religious minorities; immigrants; veterans; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; individuals with disabilities; individuals in rural communities; individuals without a college degree; individuals with or recovering from substance use disorders; and justice-impacted individuals.⁴

Moreover, on May 16, 2022, the Advisory Committee on Apprenticeship (ACA) submitted to the Secretary of Labor an interim report that makes recommendations for pre-apprenticeship experiences as on-ramps to a formal Registered Apprenticeship, noting that “building bridges to RAPs from pre-apprenticeship programs is key to their success as a workforce development strategy.” Such programs, as noted in the ACA Interim Report, must also work to identify and directly provide supportive services or facilitate the provision of supportive services through referrals.⁵

- b. Background** – In today’s economy, many new and high-demand industries are turning to the RAP model to develop and train their workforce. As the RAP model is being increasingly leveraged, ETA is reemphasizing the unique role that quality pre-apprenticeship programs play in removing barriers to RAP entry and in developing a pipeline of workers with the skills necessary to be successful in a RAP. While a quality pre-apprenticeship program can play a valuable role in providing work-based learning for all Americans, as identified in recent evaluations of the American Apprenticeship Initiative (AAI) grant program,⁶ pre-apprenticeship programs also serve as an effective tool for promoting diversity, equity, inclusion, and accessibility (DEIA) by helping individuals facing barriers to employment acquire the practical and foundational skills needed to successfully participate in the workforce and to gain entry into RAPs. Thus, many individuals may benefit from pre-apprenticeship models to help them gain industry exposure and proficiency in basic work readiness, reading comprehension, math, and other skills to enter a RAP. Quality pre-apprenticeships with a focus on outreach to underrepresented and underserved groups can also aid RAPs in meeting the EEO requirements of 29 CFR Part 30.

Pre-apprenticeship programs use varied program strategies that help place an individual on a career pathway to employability through a RAP. They utilize a wide range of program designs and approaches and often vary in duration to meet the needs of diverse populations and employers. While not required, pre-apprenticeship programs ideally would include wages or a stipend to the participant when funding allows for this. Although pre-apprenticeship programs are not intended to be prescriptive or rigid, they should ultimately provide education and workplace-simulated training that can prepare individuals to enter a RAP. Pre-apprenticeship programs may also be referred to as Apprenticeship Readiness or Apprenticeship Preparation programs.

⁴ Good Jobs Principles Fact Sheet. <https://www.dol.gov/sites/dolgov/files/goodjobs/Good-Jobs-Summit-Principles-Factsheet.pdf>

⁵ Advisory Committee on Apprenticeship – Interim Report to the Secretary of Labor, May 16, 2022 - <https://www.apprenticeship.gov/sites/default/files/aca-interim-report-may-2022.pdf>

⁶ An evaluation of the American Apprenticeship Initiative (AAI) grant program https://wdr.doleta.gov/research/FullText_Documents/ETAOP2021-23_AAI_Grant_Program_Description_Final.pdf

In 2016, ETA issued two regulations (see Section 4.a, below) that provide separate but complementary definitions of pre-apprenticeship in the context of both RAPs and the WIOA public workforce system. This notice provides information on pre-apprenticeships in the context of these regulations, reinforces ETA’s vision for quality pre-apprenticeship programs, and discusses how RAP sponsors can integrate quality pre-apprenticeship programs as one strategy in meeting their EEO requirements.

This TEN also incorporates several interim recommendations of the ACA⁷ to better utilize the pre-apprenticeship model for creating pipelines to RAP training models for all Americans, including those who are underrepresented and underserved in Registered Apprenticeship.

4. Quality Framework for Pre-Apprenticeship

a. Office of Apprenticeship and WIOA Definitions of “Pre-Apprenticeship Program.”

In 2016, ETA published two final rules that provide greater clarity and definition of pre-apprenticeship programs. The EEO in Apprenticeship Final Rule, published on December 19, 2016, established the following definition of a pre-apprenticeship program:

***Pre-apprenticeship program (29 CFR 30.2)** – means a training model designed to assist individuals who do not currently possess the minimum [academic or skills] requirements for selection into an apprenticeship program to meet the minimum selection criteria established in a program sponsor’s apprenticeship standards required under part 29 of this chapter (29 CFR part 29) and which maintains at least one documented partnership with a Registered Apprenticeship program. It involves a form of structured workplace education and training in which an employer, employer group, industry association, labor union, community-based organization, or educational institution collaborate to provide formal instruction that will introduce participants to the competencies, skills, and materials used in one or more apprenticeable occupations.*

Additionally, the WIOA Final Rule published in 2016 provided a definition of a pre-apprenticeship program for the purposes of the WIOA title I Youth formula program:

What is a pre-apprenticeship program? (20 CFR 681.480)

A pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program registered under the Act of August 16, 1937, (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to in this part as a “registered apprenticeship” or “registered apprenticeship program”) and includes the following elements:

⁷ Advisory Committee on Apprenticeship – Interim Report to the Secretary of Labor, May 16, 2022 - <https://www.apprenticeship.gov/sites/default/files/aca-interim-report-may-2022.pdf>

- a. *Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;*
- b. *Access to educational and career counseling and other supportive services, directly or indirectly;*
- c. *Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through the coursework can be applied toward a future career;*
- d. *Opportunities to attain at least one industry-recognized credential; and*
- e. *A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.*

These definitions align in their fundamental policy aims and scope, particularly regarding their respective instructional and skills development components, and their common requirement of an established partnership with a RAP. In addition to the WIOA title I Youth formula program, ETA views these complementary definitions as foundational for establishing a common quality framework for all pre-apprenticeship programs, including programs for Adults and Dislocated Workers (DW). Section 4.c below offers a framework for quality pre-apprenticeships.

b. Leveraging Pre-Apprenticeship Models as a Strategy to Drive Equity in RAPs.

RAPs that establish and cultivate close-working relationships with pre-apprenticeship programs often find that such linkages are highly effective in reducing barriers to job market entry often faced by underrepresented populations (such as women, communities of color, and individuals with disabilities)⁸ and underserved communities and can also serve to greatly enhance diversity within RAPs. Further, there is growing evidence that pre-apprenticeship is a promising pathway to RAPs for underrepresented populations, as well as other individuals with barriers to employment, and that pre-apprenticeship has a positive impact on pre-apprentices' earnings growth (nearly double) for underrepresented and underserved populations before and after enrollment in a program.⁹

⁸ The Equal Employment Opportunity in Apprenticeship Final Rule 29 CFR Part 30 ([eCFR: 29 CFR Part 30 -- Equal Employment Opportunity in Apprenticeship](#))

⁹ In 2015, DOL awarded \$175 million in grants as part of the American Apprenticeship Initiative (AAI) focused on expanding apprenticeship, particularly into sectors with few apprenticeships (such as healthcare, manufacturing, and information technology) and to populations traditionally underrepresented in apprenticeship through developing strategies that increase opportunities for underrepresented populations, low-skilled populations, and veterans into skilled occupations and industries while also addressing the barriers, income and support needs, and preparatory training unique to targeted populations. Such strategies include quality pre-apprenticeships and other strategies that can serve as on-ramps to RAPs. DOL commissioned an evaluation of the AAI grants in 2016 and published several reports, issue briefs, and infographics that provide evidence related to using pre-apprenticeship as a key strategy to drive DEIA in Registered Apprenticeship; profiles AAI grantees that developed and/or implemented quality pre-apprenticeship programs, and supportive services provided to assist and support individuals enrolled in pre-apprenticeship programs; and presents the demographic and background characteristics and the industries associated with the occupations into which pre-apprentices are registered (<https://www.apprenticeship.gov/evaluation->

29 CFR 30.3 requires RAPs to conduct a variety of activities, such as universal outreach and anti-harassment training, aimed at ensuring that such programs provide equal employment opportunity and access to both apprentices and applicants for apprenticeship. Pre-apprenticeship programs are an example of a recruitment source for RAPs to use when engaging in universal outreach.

Similarly, 29 CFR 30.8 requires RAPs with affirmative action programs to partner with entities that create pre-apprenticeship programs as part of an outreach and recruitment strategy to address any underutilization and impediments to EEO and requires programs to develop goals and activities to reduce or eliminate any barriers to the utilization of a diverse workforce.

c. Quality Framework for Pre-Apprenticeship Programs.

As noted above, pre-apprenticeship programs align around common fundamental policy aims and scope, informing a quality framework designed to prepare individuals for entry into RAPs.

The following are the five basic elements of a quality pre-apprenticeship program:

1. *Partnership with RAP sponsors.* Quality pre-apprenticeship programs should be designed and delivered, with input from at least one RAP sponsor. A pre-apprenticeship program's educational and pre-vocational services prepare individuals to meet the entry requisites of one or more RAPs and occupations. Examples of partnerships include:
 - A written plan developed by the pre-apprenticeship program with training goals to teach participants a defined set of skills required and agreed upon by one or more RAP sponsors for entry into their programs.
 - Identified engagement between one or more RAP sponsors and the pre-apprenticeship program, which can include program visits, access to RAP mentors, granting of direct entry, etc.
 - The granting of advanced standing/credit from one or more RAP sponsors for pre-apprenticeship program graduates.
 - Direct assistance to participants applying to those programs.
2. *Sustainability through partnerships.* To support their ongoing sustainability, quality pre-apprenticeship programs establish partnerships with entities to collaboratively promote the use of RAPs as a preferred means for employers to develop a skilled workforce and to create career opportunities and pathways for individuals. Partnerships may include RAP sponsors, DOL-funded intermediaries who develop programs or provide training to programs, community and faith-based

[american-apprenticeship-initiative-aii](#)).

organizations, advocacy organizations that represent underserved populations, labor organizations, joint labor-management organizations, educational institutions (including high schools and community colleges), and the public workforce system. (See section 4.e of this TEN for specific examples.)

3. *Meaningful training combined with hands-on experience replicating a workplace that does not displace paid employees.* Quality pre-apprenticeships provide hands-on training to individuals in a workplace, simulated lab experience, or work-based learning environment, which does not supplant a paid employee, but effectively simulates the industry and occupational conditions and standards of the partnering RAPs while observing proper supervision and safety protocols. Pre-apprenticeship programs ideally provide opportunities to obtain an industry-recognized credential, as well as potential stipends or wages when funding allows.
4. *Access to career and supportive services.*¹⁰ Quality pre-apprenticeship programs provide or otherwise ensure access to career and supportive services during the program, which may continue after a pre-apprentice enters a RAP. Services may include both financial and non-financial supports such as stipends, career counseling, career exploration, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, textbooks, tools, emergency grants, and other types of services necessary for an individual to succeed in pre-apprenticeship programs and RAPs.

Funding for supportive services can often be leveraged from Federal, State, local, and private funding, as well as community organizations that provide social support and/or wrap-around services.

Research from the AAI grant program identifies supportive services as critical to supporting individuals in completing RAPs, particularly for most apprentices receiving at least one type of supportive service during the apprenticeship, including purchase of training-related materials and transportation assistance; and providing dependent care assistance for apprentices with children.

For the WIOA Adult and DW programs, WIOA-funded supportive services must be provided in accordance with Training and Employment Guidance Letter (TEGL) No. 19-16 to enable WIOA Adult participants to participate in career and training services.

<https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-19-16>.

(See also TEN No. 12-21, Practitioners Guide to Supportive Services,

¹⁰ Supportive services may refer to any service that assists participants to qualify for and maintain participation in a pre-apprenticeship program or Registered Apprenticeship Program. Broadly, supportive services are those intended to assist individual participants with an assessed need in order to ensure participants' success in completing the pre-apprenticeship program, gaining employment, acquiring necessary skills, or addressing any other identified barriers. Quality pre-apprenticeship programs may directly provide supportive services to pre-apprentices or facilitate the provision of supportive services through referrals. The intent of this term is to ensure supportive services are available and emphasize the importance of such services being integrated into pre-apprenticeship programs.

https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEN/2021/TEN_12-21.pdf).

5. *Strategies that increase Registered Apprenticeship opportunities for underrepresented or underserved populations facing significant barriers to employment in the Registered Apprenticeship labor force.* Examples include:
- Thoughtful, dynamic, and documented recruitment strategies focused on outreach to one or more populations underrepresented or underserved in local, State, and national RAPs.
 - Educational and pre-vocational services as well as design of instruction and training that reach underrepresented or underserved populations to assist them in overcoming barriers to entering and succeeding in RAPs. These include career and industry awareness workshops, job readiness courses, English for Speakers of Other Languages, Adult Basic Education, financial literacy seminars, and math tutoring.
 - Exposing participants to local, State, and national RAPs and providing direct assistance to participants applying to those programs.

d. Examples of quality Pre-Apprenticeship Programs in Various Settings.

A quality pre-apprenticeship program is designed to help all individuals, including underrepresented and underserved populations, enter a RAP. Organizations that run pre-apprenticeship programs may include high schools, postsecondary educational institutions, community and faith-based organizations, employer associations, labor organizations, and joint labor-management organizations. These pre-apprenticeship programs can focus on fields traditionally associated with RAPs (e.g., construction, carpentry, plumbing), as well as emerging fields (e.g., information technology, healthcare, clean energy). Various quality pre-apprenticeship frameworks are discussed below, including descriptions of elements that should be part of pre-apprenticeship programs in these frameworks.

Pre-Apprenticeship Programs for High School Students

Pre-apprenticeship programs for high school students prepare them to enter into a RAP while in high school or after graduation. (See also TEN No. 31-16, Framework on Registered Apprenticeship for High School Students, available at https://www.dol.gov/sites/dolgov/files/ETA/advisories/TEN/2017/TEN_31-16_Acc.pdf). Many school districts across the country offer this opportunity in multiple industries. Quality pre-apprenticeship programs for high school students include the following components:

- Training and curriculum based on industry standards¹¹ and approved by the

¹¹ Industry standards, in this context, refers to the generally accepted practices of an industry, in terms of the knowledge, skills and aptitudes that are demonstrated by members of the industry. Generally accepted practices are represented by the performance of, or instruction in, specific occupational tasks relevant to that industry by

documented RAP sponsor that will prepare students with the skills and competencies needed to enter one or more RAPs.

- Training courses that are aligned to their required high school coursework for the purpose of their pre-apprenticeship program.
- On-the-Job Learning (OJL) activities beginning at age 16, which may count towards entry into a RAP.
- Skills gained in career and technical education programs under the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V, Pub. L. 115-224), which provides more than \$1.4 billion annually for career and technical education can align with pre-apprenticeship programs.
- Valuable occupational skills and opportunities to earn industry-recognized credentials and certifications.¹²
- An opportunity for students to apply to a RAP while enrolled in high school or after school graduation.
- Valuable career exposure, career planning, career awareness, mentoring, and support throughout the pre-apprenticeship program from school counselors, teachers, and others within the school system.
- Secondary and post-secondary credits that are earned based on dual or concurrent enrollment agreements or articulation agreements established between local school districts, post-secondary institutions, and RAPs, which can help to accelerate both the RTI and OJT components of the RAP.
- Supportive services for participants including funding for or connections to counseling, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, tools, textbooks, and other types of services necessary for an individual to succeed in pre-apprenticeship programs and RAPs.
- Strong recruitment strategies focused on outreach to populations underrepresented and underserved in local, State, and national RAPs.

Pre-apprenticeship Programs for Post-Secondary Students

employers, journey worker(s), educators, and other subject matter experts. By using the term industry standards in this manner, the intent of the definition is to ensure that training and/or curricula used by the quality pre-apprenticeship program align with the needs of the RAP, while still allowing flexibility in pre-apprenticeship program design.

¹² Certification is the process of attainment of a level of achievement or credential that an individual earns that attests to their acquisition of specific skills or knowledge.

Students at the post-secondary level can enter pre-apprenticeship programs offered by community colleges or universities, or at other training program locations, often run by community-based organizations. Quality pre-apprenticeship programs for post-secondary students include the following components:

- Training and curriculum based on industry standards and approved by one or more documented RAP sponsors that will prepare students with the skills and competencies needed to enter one or more RAP(s).
- Credit or non-credit courses that correspond to a RAP and their required post-secondary coursework.
- OJL or work-simulation activities, which can count towards entry into a RAP. As students move through the program, they advance to learn and master more complex competencies to become more skilled and more productive. Pre-apprenticeship may contain components of a RAP so graduates of pre-apprenticeship may get advanced standing under 29 CFR 29.5(b)(12), which grants advanced standing or credit for demonstrated competency, acquired experience, training, or skills.
- Valuable occupational skills and opportunities to earn industry-recognized credentials and certifications.
- An opportunity for students to begin to participate in a RAP anytime during their post-secondary degree studies. Students can find available apprenticeship programs in their locality or elsewhere using the DOL's [Apprenticeship Finder](#).¹³
- Counselors, professors, and others within the post-secondary school system who work with students to mentor and support them throughout the pre-apprenticeship program.
- Supportive services for participants including funding for or connections to counseling, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, reasonable accommodations for individuals with disabilities, job coaching, textbooks, tools, and other types of services necessary for an individual to succeed in pre-apprenticeship programs and RAPs.
- Strong recruitment strategies focused on outreach to populations underrepresented in local, State, and national RAPs.

Pre-Apprenticeship Programs for Out-of-School Youth (OSY), Adult, and DWs

Pre-apprenticeship programs for OSY and Adults can be offered by a variety of organizations, including industry associations, labor organizations, joint labor-

¹³ The Apprenticeship Finder can be accessed online here: <https://www.apprenticeship.gov/apprenticeship-finder>

management organizations, post-secondary educational organizations, training centers, and community- and faith-based organizations. By ensuring that apprentices have the basic level of skills required to successfully enter and be successful in a RAP, pre-apprenticeship programs are one approach for improving access to RAPs for many populations. DOL offers programs for OSY through the WIOA title I Youth formula program, YouthBuild, and Job Corps that often serve as pathways to RAPs. Organizations that provide pre-apprenticeship programs for targeted populations offer training and education that increases opportunities to access a RAP.

Quality pre-apprenticeship programs for OSY, Adults, and DWs include the following components:

- Training and curriculum based on industry standards and approved by the documented RAP sponsors that will prepare students with the skills and competencies needed to enter one or more RAPs.
- Pre-apprenticeship training courses linked to one or more RAPs.
- OJL activities that adequately prepare individuals for entry into one or more RAPs.
- Valuable occupational skills and opportunities to earn industry-recognized credentials or certifications.
- An opportunity for participants to apply to a RAP before or after they finish the pre-apprenticeship program.
- Post-secondary credits that are earned based on dual or concurrent enrollment agreements or signed articulation agreements established with post-secondary educational institutions and RAPs, which can help to accelerate both the RTI and OJT components of the RAP.
- Counselors, teachers, and others within the organization who provide students with valuable career exposure, career planning, career awareness, mentoring, and support throughout the pre-apprenticeship program.
- Supportive services for participants including funding for or connections to counseling, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, reasonable accommodations for individuals with disabilities, job coaching, books, tools, and other types of services necessary for an individual to succeed in pre-apprenticeship programs and RAPs.
- Strong recruitment strategies focused on outreach to populations underrepresented in local, State, and national RAPs.

Pre-apprenticeship Programs Specifically Designed to Support DEIA in Apprenticeship

Quality pre-apprenticeship programs specifically designed to support underrepresented

or underserved populations can be offered by a variety of organizations, including industry associations, labor organizations, joint labor-management organizations, post-secondary educational organizations, training centers, adult technical centers, and community- and faith-based organizations. As noted above in section 4.b of this Notice, pre-apprenticeship programs may play a role in removing barriers to employment and create accessible career pathways through registered apprenticeship particularly for underrepresented populations and underserved communities.¹⁴

In strengthening efforts to diversify and advance equity in the registered apprenticeship talent pipeline, quality pre-apprenticeship programs should include:

- Strong recruitment strategies focused on outreach to one or more populations underrepresented or underserved in local, State, and national RAPs.
- Design of instruction and training using universal design for learning approaches that reach underrepresented or underserved populations and assist them in navigating barriers for entering and succeeding in RAPs.
- Educational and pre-vocational services and training that assist participants in succeeding in RAPs. These include career and industry awareness workshops, job readiness courses, English for Speakers of Other Languages, Adult Basic Education, financial literacy seminars, and math tutoring.
- Opportunities to introduce participants to local, State, and national RAPs and provide direct assistance to participants applying to those programs, including continued follow-up and support even when participants do not get accepted into a RAP on the first attempt.
- Transparent entry and success requirements for RAPs and advocacy strategies for working with program sponsors to remove eligibility requirements or other barriers that are not job-related and adversely impact underrepresented groups.
- Supportive services for participants including funding for or connections to college courses, counseling, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, reasonable accommodations for individuals with disabilities, job coaching, textbooks, tools, and other types of services necessary for an individual to succeed in a pre-apprenticeship program or RAP.

¹⁴ EO 13985 -- [Federal Register :: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government) (<https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government>), and EO 14091 – [Executive Order on Further Advancing Racial Equity and Support for Underserved Communities Through The Federal Government – The White House](https://www.whitehouse.gov/briefing-room/presidential-actions/2023/02/16/executive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/) (<https://www.whitehouse.gov/briefing-room/presidential-actions/2023/02/16/executive-order-on-further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>).

e. Workforce System Partnerships with Quality Pre-Apprenticeship Programs and RAPs.

WIOA emphasizes providing services to individuals with barriers to employment, as defined in WIOA Sec. 3(24) (29 U.S.C. § 3102(24)), to help them enter or reenter the workforce. The benefits of collaboration across workforce system partners and pre-apprenticeship programs include boosting training, promoting DEIA, and enhancing job placement. ETA encourages the American Job Center (AJC) network to familiarize itself with this quality framework to support expanded partnerships between quality pre-apprenticeship programs and RAPs. Services funded by WIOA title I, including basic and individualized career services, may support individuals with barriers to employment through participation in pre-apprenticeship programs.

WIOA Adult and DW Programs: Pre-apprenticeship programs may be considered a training service for Adult and DW program participants, and participants are counted as receiving training services for reporting purposes. For more detail on training, please refer to TEGL No. 21-22 and 20 CFR 680.200. If a pre-apprenticeship program would not be considered training, it may be considered a career service. Services provided in the Adult program, including pre-apprenticeship programs, must follow the adult priority of service requirement, as highlighted in TEGL No. 07-20. Priority of service requires that no fewer than 50.1 percent (and encourages that at least 75 percent of a State's participants) must be from a priority population, including recipients of public assistance, individuals who are basic skills deficient, or those identified as low-income.

A pre-apprenticeship program for Adults and DW program participants may be funded using an Individual Training Account if it is a training service and is on the State's list of Eligible Training Providers (ETP). To be included on the ETP list, a pre-apprenticeship program must follow the State's eligibility procedures. All RAP sponsors are eligible for inclusion on the ETP List but must opt in. The same general rule does not apply to pre-apprenticeship programs. RAP providers must elect to opt in to ETPs. More information on ETP eligibility can be found in TEGLs No. 08-19 and No. 13-16, Change 1.

WIOA Youth Program: A pre-apprenticeship program is considered a type of work experience, and the WIOA Youth program includes a requirement to spend a minimum of 20 percent of local youth funds on work experience. In addition, if the pre-apprenticeship program includes an occupational skills training component, separate from the work experience, WIOA Youth programs may report pre-apprenticeship under both the work experience program element and the occupational skills training program element.

YouthBuild: In the WIOA regulations at 20 CFR 688.120, YouthBuild programs funded by DOL are recognized as pre-apprenticeship programs. The YouthBuild pre-apprenticeship program model encompasses education, occupational skills training, leadership development, and post-program placement opportunities.

Job Corps: Pre-Apprenticeship designation in Job Corps, which may be sought by individual Job Corps Center operators in the various trades offered at each center, is monitored at the national level to ensure quality programming, formal documentation, and program visibility of pre-apprenticeship providers nationally. Quality standards mirror those outlined in this TEN and apply to active student participants in either Job Corps’ basic or advanced training programs. Opportunities to enroll in RAPs are open to all graduates of the Job Corps program.

Trade Adjustment Assistance for Workers (TAA) Program: Pre-apprenticeships are an allowable type of work-based learning under the TAA Program. Workers enrolled in a pre-apprenticeship are subject to the training duration limits found in 20 CFR 618.615(d)(3). Training funds are authorized for payment of a pre-apprenticeship program for workers meeting the six criteria for TAA-funded training and other criteria for approval of training provided in 20 CFR 618.610.

H-1B-funded Skills Training Programs: H-1B Skills Training Grants fund projects that provide training and related activities to workers to assist them in gaining the skills and competencies needed to obtain or upgrade employment in high-growth industries or economic sectors. These grants are supported by user fees paid by employers seeking high-skilled foreign workers under the H-1B visa program. Funds are authorized by Section 414(c) of the American Competitiveness and Workforce Improvement Act of 1998, as amended (29 U.S.C. § 3224a).

Pre-apprenticeships are generally an allowable program activity in H-1B Skills Training Grants as part of career pathways that lead to middle- to high-skilled H-1B occupations. Generally, H-1B grants require that pre-apprenticeships be offered only when articulated with a RAP. It is important to note the limitations of what populations may be served through H-1B Skills Training Grants given that eligible participants must be older than 16 and not currently enrolled in a local educational agency. This is of particular importance given the acceptance of the pre-apprenticeship model as an evidence-based strategy to increase entry points into RAPs. To broaden the impact of these funds, public workforce system stakeholders should carefully review the requirements of each H-1B Skills Training Grant Funding Opportunity Announcement for guidance on how pre-apprenticeships are addressed in specific H-1B-funded grant.

Women in Apprenticeship and Nontraditional Occupations (WANTO) Technical Assistance Grant Program: The WANTO grant program provides technical assistance (TA) to employers and labor unions to encourage employment of women in apprenticeable and nontraditional occupations.¹⁵ Historically, in addition to providing job skills training for women through pre-apprenticeship programs, WANTO grantees have also provided ongoing training for employers and unions on creating a more

¹⁵ “Nontraditional occupations” are defined by the Women in Apprenticeship and Nontraditional Occupations Act of 1992 (Pub. L. 102-530) as “jobs in which women make up 25 percent or less of the total number of workers in that occupation.”

supportive environment and culture for women to succeed in these careers. Lastly, WANTO grantees have set up support groups, facilitated networks, and provided supportive services for women to improve their retention in both pre-apprenticeships and Registered Apprenticeships. Pre-apprenticeships funded by WANTO grants are considered quality programs with a particular focus on outreach, recruitment, and retention of underrepresented communities.

U.S. Department of Education Programs: The U.S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE) administers and coordinates programs that are related to adult education and literacy, career and technical education, and community colleges. The Strengthening Career and Technical Education for the 21st Century Act (Perkins V) was signed into law on July 31, 2018. The measure reauthorized the Carl D. Perkins Career and Technical Education Act of 2006 (Perkins IV), providing nearly \$1.4 billion annually for career technical education for youth and adults. Per guidance issued by the U.S. Department of Education, Perkins funds may be used to develop, improve, and support RAPs that are part of the national apprenticeship system authorized by the National Apprenticeship Act of 1937 (29 U.S.C. 50 et seq.) and its implementing regulations (Title 29 C.F.R. Part 29), as well as their prerequisite pre-apprenticeship programs.¹⁶ Pre-apprenticeship programs that provide individuals with rigorous academic content and build technical skill proficiency to prepare them to succeed in RAPs constitute “prerequisite courses” as contemplated by the Perkins V definition of CTE. Consequently, States may use Perkins V State leadership funds to develop, improve, and support RAPs and their components and prerequisites. Subrecipients may also use Perkins V funds to develop, coordinate, implement, or improve RAPs and their components and prerequisites provided that these programs are sufficient in “size, scope, and quality to be effective” as determined by the State, address needs identified in the biennial comprehensive local needs assessment required by section 134(c), and meet other applicable requirements of Perkins V.

In 2018, OCTAE used Perkins V national activities funding for six State grants under the “Pathways to [science, technology, engineering, and mathematics (STEM)] Apprenticeship for High School Career and Technical Education Students” demonstration program. The six States—Kentucky, Maryland, Nebraska, Oregon, Rhode Island, and Tennessee—used their funds to expand and improve the transition of high school CTE students to postsecondary education and employment through apprenticeships in STEM fields, including computer science, that begin during high school. The Maryland Department of Education, for example, used its grant to expand Apprenticeship Maryland from a pilot program developed in counties to a Statewide model through subgrants to LEAs and community colleges. Participating students start Apprenticeship Maryland in their junior year and complete at least 1 year of related

¹⁶ [ED-OCTAE Memo 23-1 Apprenticeship.pdf](https://s3.amazonaws.com/PCRN/docs/ED-OCTAE%20Memo_23-1_Apprenticeship.pdf) ([https://s3.amazonaws.com/PCRN/docs/ED-OCTAE%20Memo_23-1 Apprenticeship.pdf](https://s3.amazonaws.com/PCRN/docs/ED-OCTAE%20Memo_23-1_Apprenticeship.pdf)).

YouthBuild Pre-Apprenticeship Framework.

([https://youthbuild.workforcegps.org/resources/2019/04/11/12/49/DOL_YouthBuild_Webcast-YouthBuild Model and Pre-Apprenticeship Overview](https://youthbuild.workforcegps.org/resources/2019/04/11/12/49/DOL_YouthBuild_Webcast-YouthBuildModelandPre-ApprenticeshipOverview))

- [YouthBuild Construction Plus Framework for a Quality Pre-Apprenticeship Experience](https://youthbuild.workforcegps.org/resources/2018/06/04/16/48/ConstructionPlusFrameworkforaQualityPre-ApprenticeshipExperience) describes how YouthBuild programs can apply the five elements of a pre-apprenticeship, as defined in 20 CFR 681.480, to develop training in additional in-demand industries beyond construction. ([https://youthbuild.workforcegps.org/resources/2018/06/04/16/48/Construction Plus Framework for a Quality Pre-Apprenticeship Experience](https://youthbuild.workforcegps.org/resources/2018/06/04/16/48/ConstructionPlusFrameworkforaQualityPre-ApprenticeshipExperience)).
- The [Literacy Information and Communication System \(LINCS\)](https://lincs.ed.gov/) is a national leadership initiative of the U.S. Department of Education, Office of Career, Technical, and Adult Education (OCTAE) to expand evidence-based practices in the field of adult education. LINCS offers on-demand, evidence-based professional learning through resources, self-paced online learning courses, and virtual communities of practice. It hosts expert-vetted, evidence-based resources and serves as a platform for adult educators, learners, and State educational staff to acquire professional development and skills. (<https://lincs.ed.gov/>)
 - The [Creating Adult Pre-Apprenticeships](#) course is designed to help adult education providers develop new programs, as well as support providers who are refining existing pre-apprenticeships or implementing similar integrated education and training programs. It includes examples and resources that are relevant to a range of adult education providers and a variety of industries. This course was developed following the Rethink Adult Ed Challenge and includes many resources that the challenge finalists found helpful during the Virtual Accelerator. Completers can download a certificate of completion upon completion.
- **AAI Evaluation Reports:** In 2016, DOL commissioned an evaluation of the AAI grants to build evidence about the effectiveness of Registered Apprenticeship for apprentices and employers. The evaluation also identifies lessons learned for developing and operating these programs. The following evaluation reports, issue briefs, and infographics have been published and are available on [Apprenticeship.gov's AAI Evaluation Resource Page](https://www.apprenticeship.gov/evaluation-american-apprenticeship-initiative-aa/) (<https://www.apprenticeship.gov/evaluation-american-apprenticeship-initiative-aa/>), [ETA's Publication Database](https://www.dol.gov/agencies/eta/research/Registered-Apprenticeship-Evidence) (<https://www.dol.gov/agencies/eta/research/Registered-Apprenticeship-Evidence>), and [DOL's Chief Evaluation Office's Completed Reports](https://www.dol.gov/agencies/oasp/evaluation/completedstudies) (<https://www.dol.gov/agencies/oasp/evaluation/completedstudies>) website.

Final Reports:

- [Expanding Apprenticeship to New Sectors and Populations: The Experiences and Outcomes of Apprentices in the American Apprenticeship Initiative](#)
- [Achieving Apprenticeship Program and Apprentice Registration Targets: Grantee Outcomes from the American Apprenticeship Initiative](#)
- [Implementing Registered Apprenticeship Programs: Experiences of 10](#)

- [American Apprenticeship Initiative Grantees](#)
- [Expanding Registered Apprenticeship in the United States: Description of American Apprenticeship Initiative Grantees and Their Programs](#)
- [Do Employers Earn Positive Returns to Investments in Apprenticeship? Evidence from Registered Programs under the American Apprenticeship Initiative](#)
- [Engaging Employers to Register Apprenticeship Programs: Outcomes from the American Apprenticeship Initiative Employer Engagement Demonstration](#)

Issue Briefs:

- [Expanding Registered Apprenticeship Opportunities to Underrepresented Populations: Findings from the American Apprenticeship Initiative Evaluation \(Issue Brief\)](#)
- [Challenges and Opportunities for Expanding Registered Apprenticeship with Workforce Innovation and Opportunity Act \(WIOA\) Title I: Findings from the American Apprenticeship Initiative Evaluation \(Issue Brief\)](#)
- [Beyond Productivity: How Employers Gain More from Apprenticeship: Findings from the American Apprenticeship Initiative Evaluation \(Issue Brief\)](#)
- [Did Apprentices Achieve Faster Earnings Growth Than Comparable Workers? Findings from the American Apprenticeship Initiative Evaluation \(Issue Brief\)](#)
- [What Are the Costs of Generating Apprenticeships? Findings from the American Apprenticeship Initiative Evaluation \(Issue Brief\)](#)

Infographics:

- [Overview of AAI Underrepresented Populations Findings](#)
- [Overview of AAI Apprentice Findings](#)
- [Overview of AAI Pre-Apprentice Findings](#)
- [Overview of AAI Employer Findings](#)

For more information, please visit the Apprenticeship.gov website.

5. **Inquiries.** Questions about this TEN should be directed to Andrew Ridgeway of the Office of Apprenticeship at Ridgeway.Andrew@dol.gov.

6. **References.**

- Act of August 16, 1937, (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.)
- Equal Employment Opportunity in Apprenticeship Regulations at 29 CFR part 30
- WIOA Regulations at 20 CFR part 681
- TEN No. 31-16, *Framework on Registered Apprenticeship for High School Students*. (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-31-16>)
- TEGL No. 21-22, *Increasing Equitable Service Access and Employment Outcomes for All Jobseekers in Workforce Innovation and Opportunity Act Adult and Dislocated*

- Worker Programs.* (<https://www.dol.gov/agencies/eta/advisories/tegl-21-22>)
- TEGL No. 21-16, *Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance* (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-21-16>)
 - TEGL No. 19-16, *Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules.* (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-19-16>)
 - TEGL No. 13-16, *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA).* (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-13-16>)
 - TEGL No. 13-16, Change 1, *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA).* (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-13-16-change-1>)
 - TEGL No. 08-19, *Workforce Innovation and Opportunity Act (WIOA) Title I Training Provider Eligibility and State List of Eligible Training Providers (ETPs) and Programs.* (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-guidance-letter-no-08-19>)
 - TEGL No. 07-20, *Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program.* (<https://www.dol.gov/agencies/eta/advisories/training---employment-guidance-letter-no-07-20>)
 - TEN No. 12-21, *Practitioners Guide to Supportive Services.* (<https://www.dol.gov/agencies/eta/advisories/training-and-employment-notice-no-12-21>)

7. **Attachments.** None