

<p><b>U.S. Department of Labor</b>                  Employment and Training Administration                  Bureau of Apprenticeship and Training                  Washington, D.C. 20210</p>	<p><b>Distribution:</b>                  A-541 Hdqtrs.                  A-544 Field TC.                  A-547 SD &amp; RD</p>	<p><b>Subject:</b> Code 400.3                  Time and Performance (Competency) Considerations in Apprenticeship Programs; and Minimum Time Required to Award a Completion Certificate</p>
<p><b>Symbols:</b> DNIP:AB</p>		<p>Action: Immediate</p>

**PURPOSE:** The purpose of this Circular is to review and clarify the various ways by which on-the-job work process schedules may be developed and considered acceptable by the Bureau of Apprenticeship and Training (BAT) to be included in registered apprenticeship standards.

This Circular is also intended to clarify the minimum amount of time an individual must be enrolled as an apprentice in a registered apprenticeship program in order to qualify for and receive a Certificate of Completion of Apprenticeship from BAT.

**BACKGROUND:** Paragraphs 29.5 (2) and (3) of Title 29 CFR Part 29 indicate that an apprenticeship program to be eligible for registration shall have term of apprenticeship, not less than 2,000 hours (emphasis added) of work experience, consistent with training requirements as established by industry practice, and shall have an outline of work processes with the allocation of the approximate time (emphasis added) to be spent in each major process.

By definition, performance-based apprenticeship programs are premised on competencies demonstrated in lieu of time considerations. However, Title 29 CFR Part 29 requires that time considerations be addressed in a registered apprenticeship program as referenced above. Therefore, in order to comply with the regulations, apprentices registered in performance-based apprenticeship programs will be required to work a minimum of 2,000 hours on the job as an apprentice (competencies demonstrated notwithstanding and assuming no credit for previous experience).

In addition to time based and performance based programs, another alternative has evolved which, in effect, is a hybrid of the two types of programs mentioned above. This third type of program is basically a combination of time and performance considerations whereby work processes are developed with a minimum/maximum time for each task or job requirement. This alternative seems to be growing in popularity and is being utilized more frequently. In fact, competency based program sponsors seem to prefer this approach in developing the work process statement. See example of the recently approved new apprenticeable occupation for Guard, Security as presented in BAT Bulletin No. 95-06.

While competency or performance levels of an apprentice's capabilities introduce considerations toward advancement and completion not addressed by the traditional time based program, time considerations are still important especially in awarding a Certificate of Completion of Apprenticeship. In order for an apprentice to be awarded such a Certificate, he/she must have worked as a registered apprentice a minimum of 1,000 hours for the program sponsor requesting the Completion Certificate.

**ACTION:** All apprenticeship program sponsors (existing and new) should be made aware of the options available to them in developing their work process schedules. Also, sponsors should be informed that apprentices must work as a registered apprentice in their program for at least 1,000 hours before a Completion Certificate will be awarded by BAT.