SUPPORTING STATEMENT
Pre-Apprenticeship Database

OMB No. 1205-0NEW

A. JUSTIFICATION

1. Reasons for Data Collection

Quality pre-apprenticeship programs play a valuable role in preparing entrants for Registered Apprenticeship programs and in contributing to the development of a diverse and skilled workforce. Pre-apprenticeship programs can be adapted to meet the training needs of differing populations in the context of opportunities available in local labor markets. The development of an online database of quality pre-apprenticeship programs will provide a valuable tool for job seekers, Registered Apprenticeship program sponsors, and American's Job Center front line staff. A dedicated database will also provide a way for job seekers and Registered Apprenticeship programs to access pre-apprenticeship programs in their local areas.

ETA does not currently, nor is it planning to, register or certify pre-apprenticeship programs. Instead, ETA intends its proposed database to serve as a catalyst for pre-apprenticeship providers to connect with Registered Apprenticeship program sponsors. Through technical assistance, ETA will seek to improve the consistency and quality of these pre-apprenticeship programs.

Through the development of an online database, ETA will identify pre-apprenticeship programs that meet the "quality pre-apprenticeship" definition and the quality framework criteria. Finally, a national database of pre-apprenticeship programs will facilitate connections between pre-apprenticeship program participants and Registered Apprenticeship program sponsors. The database will be a web-based information tool that can identify the nearest pre-apprenticeship program and describe the services and training it provides to prepare participants for eligibility for Registered Apprenticeship programs.

Registered Apprenticeship combines paid, on-the-job learning with related technical/theoretical classes in a career field. Industries and employers are highly involved in the development and implementation of the programs. The earn-while-you-learn model is well-structured and rigorous, consisting of a minimum144 hours of class time per year combined with a minimum of 2,000 hours of on-the-job learning.   The length of a program can vary between one (1) and five (5) years, depending on the occupation. Registered Apprenticeships offer job seekers immediate employment opportunities that pay good wages and lead to career growth, highly-sought life and skill sets, portable credentials and the opportunity to apply their apprenticeship training to two- and four-year post-secondary programs.

The Registered Apprenticeship System is administered by ETA's Office of Apprenticeship (OA), which oversees Registered Apprenticeship programs as well as State Apprenticeship Agencies (SAAs). The National Apprenticeship Act of 1937, (subsequently referred to as "the Act") Section 50 (29 U.S.C. 50), authorizes and directs the Secretary of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices, to extend the application of such standards by encouraging the inclusion thereof in contracts of apprenticeship, to bring together employers and labor for formulating programs of apprenticeship, to cooperate with State agencies engaged in formulating and promoting standards of apprenticeship, and to cooperate with the Secretary of Education in accordance with Section 17 of Title 20. Section 50a of the Act authorizes the Secretary of Labor to "publish information relating to existing and proposed labor standards of apprenticeship," and to "appoint national advisory committees..." (29 U.S.C. 50a). The administration of the system is guided by Title 29 Code of Federal Regulations (CFR), part 29, regulations that were updated in 2008 to address the 21st century workforce needs as well as enhance accountability of the recognized SAAs.

A national database of pre-apprenticeship programs will help facilitate connections between pre-apprenticeship program participants and Registered Apprenticeship program sponsors. This web-based information gathering tool will help a variety of workforce system customers and practitioners (i.e., job seekers, Registered Apprenticeship program sponsors (and American's Job Center) front line staff) to identify the nearest pre-apprenticeship program (geographically by zip code or city/state). The organizations that will provide input information into the database will be:
- ✓ Community-based Organization (CBO);
- ✓ Registered Apprenticeship program sponsors; and
- ✓ Labor organizations and employers.

These organizations will self-identify themselves as having a quality pre-apprenticeship program.

Audience for the Directory:
- Job seekers
- American's Job Center front line staff
- Registered Apprenticeship program sponsors
- CBOs
- Faith-Based Organizations

Data for each program listed will include:
- Industries they are serving
- Occupations for which they offer training
- Connections to Registered Apprenticeship programs
- Number of participants they serve
- Population they serve
- Support services available
- Menu of preparatory skills they teach to train pre-apprentices

This voluntary data collection will be an online form.

Those looking to find information about pre-apprenticeship programs will go to a map on a website, click on a state, and be able to see where the pre-apprenticeship programs are located as well as general information about the programs. This system will facilitate partnerships between Registered Apprenticeship programs and pre- apprenticeship programs, resulting in expanded opportunities for underrepresented populations. Pre-apprenticeship training programs have successfully demonstrated that obstacles such as low math skills, poor work habits, lack of access to transportation, and lack of knowledge of sector opportunities can be overcome through coordinated training and support.

Application for Pre-Apprenticeship Programs:

Step 1 asks the program for contact information including the name of the program, name of program director and an alternate point of contact for the program.

Step 2 asks about the population served and if the program has a direct link to Registered Apprenticeship. It also asks for the information on the nature of the direct link or partnership.

Step 3 asks about the curriculum. Was it developed with input from Registered Apprenticeship or industry? Does the training lead to a credential or certificate? Has the training been approved by a Registered Apprenticeship program?

Step 4 asks about other services the pre-apprenticeship program provides to participants (i.e., supportive services beyond training to the most-in-need participants). Does the program conduct skill assessments? Does the program include case manager(s)? Does the structure of the program offer a real work environment? What industries are serviced by the program? What occupation(s) does the program offer training in?

Regulations

See OA's website at: http://www.doleta.gov/oa/pdf/FinalRule29CFRPart29.pdf

2. Purpose of Information Collection

The purpose of the information collection is to create a public database and website on pre-apprenticeship programs. The database will help expand opportunities for underrepresented populations to enter Registered Apprenticeship programs. Pre-apprenticeship training programs have successfully demonstrated that obstacles such as low math skills, poor work habits, lack of access to transportation, and lack of knowledge of sector opportunities can be overcome when coordinated training and support are provided to workers. Women in particular can benefit from pre-apprenticeship programs that provide training and ultimately employment opportunities in

such high-wage and high-growth sectors as construction, manufacturing, and other industries where women have been underrepresented.

The pre-apprenticeship database will benefit employers by providing them access to a larger labor pool, and workers will have more opportunities to access high-wage employment and career pathways, with benefits such as healthcare and pensions.

3.   Technology to Reduce Burden

The application will be web-based and easy to navigate. An OA employee will be available to provide full technical assistance and services to those sponsors, colleges and organizations/associations that lack computer technology. Once OMB approves the form submitted with this ICR, ETA will deploy collection online. It is estimated to take approximately six months to operationalize this collection. The agency will submit a non-material change to incorporate the screenshots into the ICR.

4. Duplication

Articulation agreement information is not required in the Registered Apprenticeship Partner Information Data System (RAPIDS), nor is ETA aware of any database that collects this information, so the information provided (on a voluntary basis) is not duplicative.

5. Efforts to Reduce Burden on Small Businesses or Other Small Entities

The information collected by the pre-apprenticeship database has a minimal impact on small businesses. This information collection requests only basic information to help individuals and other interested parties find the information needed to contact quality pre-apprenticeship programs.

6. Consequences of Failure to Collect Data and Burden Reduction Obstacles

Failure to conduct this voluntary information collection would prevent the creation of a public database and website that will provide wider access to pre-apprenticeship programs.

7. Special Circumstances

No special circumstances are involved. The information is collected in a manner consistent with paperwork reduction requirements.

8. Pre-Clearance Notice

A Pre-clearance Notice for sixty (60) days' public comment was published in the Federal Register on November 25, 2014 (Vol. 79, p. 70205). Comments were received from Nicole Barclif, Senior Policy Officer, Local Initiatives Support Corporation (see the first five comments

and responses below), and from Andrew Larson, the International Union of Painters and Allied Trades' National Project Coordinator for the Job Corps Pre-Apprenticeship Program (see the final set of three comments and responses). We appreciate their taking the time to share their thoughtful comments with us in support of the Pre-Apprenticeship Database. Their summarized comments, and the Agency's responses, are reflected in the matrix below:

Comment:	Agency Response:
1 Ask pre-apprenticeship programs to indicate whether their program offers "wrap-around: support services to participants (for example, financial coaching, income supports access, ongoing career coaching, etc.), and, if so, what specific services.	We believe that we address wrap-around support services in #15 ("Does your program provide supportive services or facilitate access to appropriate support services to the participants? (if yes, please list those supportive services") and #19 ("Does your program have a case manager on staff to refer participant to support programs?")
2 Clearly specify which potential apprenticeships, career paths, industries, etc. that the pre-apprenticeship can lead to, and discuss how the pre-apprenticeship program fits into a career pathway.	We believe that these issues are covered by #23 ("Which industries are currently served by your program? Select all that apply…") and #24 (For which occupation(s) does your program currently offer training?
3 Clearly indicate what industry-recognized credential(s), if any, participants will receive upon completion of the pre-apprenticeship (or what credentialing/licensing exam the pre-apprenticeship offers preparation for, in cases where participants are required to sit for a third-party exam in order to attain the credential).	In #13, we ask whether the training leads to a certificate or credential and, if so, we ask for a narrative response.
4 Indicate pre-apprenticeship entry requirements, if any.	In response to your suggestion, we have added this question under "Program Information" (new number 8).
5 Indicate what other resources in their community exist as a "first step" toward (or "feeder" into) the pre-apprenticeship program, for database users who may be interested in a particular pre-apprenticeship program but do not yet meet the entry requirements.	If individuals do not meet the program requirements, we recommend that they contact the Pre-Apprenticeship Program for other resources. We will include as part of the data base instruction section the following—If you find that you do not meet the program entry requirements please contact your One Stop to find out how they can assist you.
1. Identify in the official Job Corps website(s) and recruitment literature the career training choices offered at each Job Corps center, including:	We will certainly recommend these suggestions to ETA's Job Corps Office.

a. The name of the national training provider organization. b. Whether the NTP is directly connected with a nationally registered apprenticeship program.	
2. Include a brief description of the benefits of registered apprenticeship and website links to the Office of Apprenticeship website and Job Corps national training provider organizations in all Job Corps websites and promotional materials.	Again, we will share these ideas with ETA's Job Corps Office.
3. Include all the Job Corps pre-apprenticeship programs-- including the identity of the national training provider and the address of the Job Corps center where the program is housed--in any list or directory of quality pre-apprenticeship programs.	We will send a request to ETA's Job Corps Office asking that they notify the Job Corps Centers about the Pre-Apprenticeship database, once it is implemented, and request that they link to the database and provide information about it.

9. Payments to Respondents

This information collection does not involve payments to respondents.

10. Confidentiality

No assurance of privacy is provided, and information collected will be posted on a public website. The agency notes, however, that no information which compromises privacy is requested.

11. Questions of a Sensitive Nature

No information is collected that is considered to be of a sensitive nature.

12. Respondent Annual Burden

The purpose of the data collection is to establish a list of qualified pre-apprenticeship programs. There will be a one-time data entry burden. Organizations will be asked to update information once every three years, particularly regarding the point of contact and any additions or changes to their training or curriculum support services. OA will ensure that updated information comes from the authorized organization by having updates go to a designated e-mail account. Upon receipt and review, OA staff will verbally verify the information with the organization, with the total annual estimated burden at 10 minutes per organization and 5 minutes per OA's federal staff member.   The estimate is based on prior program experience with collecting information

for the Registered Apprenticeship College Consortium (RACC) via the ETA website (http://doleta.gov/oa/racc.cfm). See OMB control number 1205-0512.

OA does not currently have detailed information on the number of pre-apprenticeship programs nationwide, as that information is not required in the program's case management system—RAPIDS. However, OA estimates that of the 19,000 Registered Apprenticeship Program Sponsors nationwide-approximately 10% or 1,900 have a relationship with a pre-apprenticeship program.   Please note that the number of program sponsors is captured in our case management system. See OMB control number 1205-0223. Furthermore, the 10% of programs having a pre-apprenticeship relationship is based on ETA knowledge of existing pre-apprenticeship programs. OA estimates that it will take a representative from a pre-apprenticeship program approximately 10 minutes to enter information on the form, including the time necessary to research and gather information, added to the 5 minutes on the phone with an OA staff member to verify the information. Of the estimated 1,900 pre-apprenticeship programs nationwide in Fiscal Year (FY) 2014, we estimate that 100 such programs will voluntarily join the directory each year. This estimate is based on prior experience with collecting information via the website for the Registered Apprenticeship College Consortium (RACC).   See OMB control number 1205-0512.

Annual Burden Hours

Respondents: 100 pre-apprenticeship programs times 10 minutes per form entered online = 10 minutes x 100 entries and 5 minutes for oral verification by phone with an OA staff person = 5 minutes x 100 verifications for a total of 15 minutes per entry x 100 = 25 hours for the one-time cost per program. OA believes that approximately 100 pre-apprenticeship programs will be added annually to the database.[1] Thus the annual total for this one-time cost is 25 hours.

The respondent's directory information will be reviewed once every three years to ensure that the point of contact information and the program information are current. OA will email the program a form with the existing information. We estimate it will take no more than five minutes for the respondent to review, update the information (if necessary), and email the form back to OA. Total: 5 minutes x 100 updates annually = 8 hours.

ANNUAL RESPONDENT TOTAL: 25 hours + 8 hours = 33 hours

Annual Cost to Respondents: 33 hours x $16.59 = $547 (rounded).

* The $16.59 mean hourly rate for the respondents' clerical staff was obtained from the U.S. Department of Labor, Bureau of Labor Statistics Occupational Employment Survey, May 2014: 43-6014 Secretaries and Administrative Assistants, Except Legal, Medical, and Executive (http://www.bls.gov/oes/CURRENT/oes436014.htm).

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[1] ROCIS includes an annually estimated of 300 pre-apprenticeship programs because maintenance and updating applies to all program included in the collection

13. Estimated Cost to Respondents

There are no additional costs other than those mentioned in Number 12 above.

14. Cost to Federal Government

The cost to develop and maintain the online form/website to gather and track information for this collection, including the one-time development cost, is estimated at $150,000. The annualized cost over three years is $50,000 and will become $1,000 annually after the initial development costs end. ($150,000 + $1,000 + $1,000)/3 years = $50,667 per year. Finally, we are estimating a similar amount (16 hours x $41.48 = $664) for annual Federal oversight for the initial development and maintenance of the online form and website. Thus, $50,667 + $664 = $51,331.

This estimate includes costs of Federal oversight for the initial development and maintenance of the online form and website.

The burden to the Federal government based on the GS-12/5 salary of $41.48 per hour from the OPM General Schedule for the Washington DC area effective January 2015 is primarily for initial input, review and management of the materials submitted by the sponsors to the online form/website. The annualized cost of reviewing, verifying, and updating with the respondents the anticipated 100 responses (100 responses x 10 minutes, which equates to 16 hours x $4l.48) is $664.

TOTAL ANNUALIZED COSTS: $51,331 + $664 = $51, 995.

Online form development and maintenance costs First three years, annualized	$50,667	
Annual Federal oversight for form development and maintenance	$664	16 hours
Annual Federal staff cost for reviewing, updating materials	$664	16 hours

15. Reasons for Program Change and Change in Burden

This is a new collection.

16. Publication Information

Information will be available on the website and accessible to the public. ETA anticipates information to be posted to a public online directory within one month after the respondent enters the information online.

17. Reasons for Not Displaying Date OMB Approval Expires

ETA is not requesting a waiver for the display of the OMB expiration date. It will be displayed on the website and in any ETA/OA issuances.

18. Exceptions to Certification

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This collection of information does not employ statistical methods.