

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Quality Pre-Apprenticeship
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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. XX-XX

TO: STATE WORKFORCE AGENCIES
 STATE WORKFORCE LIAISONS
 STATE APPRENTICESHIP AGENCY DIRECTORS
 STATE WORKFORCE DEVELOPMENT BOARDS AND STAFF
 LOCAL WORKFORCE DEVELOPMENT BOARDS AND STAFF
 OFFICE OF APPRENTICESHIP FIELD STAFF
 OFFICE OF APPRENTICESHIP STATE AND REGIONAL DIRECTORS
 JOB CORPS CENTER DIRECTORS
 YOUTHBUILD PROGRAMS

FROM: MOLLY E. CONWAY
 Acting Assistant Secretary

SUBJECT: Updates to Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources

- 1. Purpose.** The purpose of this guidance is to update the previous Training and Employment Notice (TEN) 13-12, *Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources*, to define a pre-apprenticeship program, include pre-apprenticeships pathways that may connect to Registered Apprenticeship Programs¹(RAPs), and to come into alignment with current Workforce Innovation and Opportunity Act (WIOA) guidance.
- 2. Action Requested.** States are requested to disseminate this information broadly to local areas to build broader understanding of pre-apprenticeship programs and this critical connection to RAPs.

¹ RAP is defined as a proven model of apprenticeship that has been validated by the U.S. Department of Labor or a State Apprenticeship Agency. The U.S. Registered Apprenticeship System is authorized through the National Apprenticeship Act of 1937 (29 U.S.C. 50 et seq.).

RESCISSIONS

None

EXPIRATION DATE

Continuing

3. Summary and Background.

- a. Summary – Apprenticeship² is an effective "earn and learn" model with a long history of establishing career ladders and pathways in multiple industries and sectors. In Fiscal Year (FY) 2018, more than 238,000 individuals nationwide entered the apprenticeship system. The National Apprenticeship System had 585,026 active apprentices in over 23,441 programs across the country. The significant growth in number of apprentices in FY 2018 was 135 percent higher than the previous 20-year annual average of 434,110 apprentices. The average income of participants that successfully completed their apprenticeship was \$70,000. These results demonstrate the advantages an apprenticeship offers in providing a significant wage gain and clear career path for entry-level workers and the effectiveness of the apprenticeship model in training a productive workforce for businesses.³
- b. Background – In today's economy, many new and high-demand industries are offering apprenticeship opportunities that require a different approach to help individuals enter into RAP. The American workforce is changing, and there has been a surge of opportunities in emerging sectors such as information technology, cybersecurity, advanced manufacturing, health care, logistics, and financial services without the corresponding growth in the skilled workforce to fill job vacancies. Apprenticeship is an efficient and economical solution both to give workers the skills they need for the jobs of today and the future, and to meet employers' needs for skilled labor. Still, many individuals do not have proficiency in basic work-readiness, reading comprehension, or math skills to enter a RAP. Pre-apprenticeship programs and apprenticeship programs offer additional career pathways for underserved populations, including women, minorities and people with disabilities. Creating training opportunities through pre-apprenticeship programs that ready them for a RAP meets the present and future labor market demands while preparing individuals for well-paying careers.

Quality pre-apprenticeship programs can play a valuable role in providing work-based learning to prepare for an entry-level RAP. With the goal of one million new apprentices by 2022, a vibrant pre-apprenticeship network will support and expand new avenues of entry into RAPs for populations that would otherwise not have access to middle class careers offered through apprenticeships. This workforce strategy will also help close the skills gap, helping American businesses be more productive.

Pre-apprenticeship programs may use a variety of program designs and approaches and can be adapted to meet the needs of diverse populations and employers. Although pre-apprenticeship programs are not intended to be prescriptive or rigid, they should

² Apprenticeship is an industry-driven, high-quality career pathway where employers can develop and prepare their future workforce, and individuals can obtain paid work experience, classroom instruction, and a portable, nationally-recognized credential.

³ Return on Investment Studies in the United States and other countries
<https://apprenticeshipusa.workforcegps.org/resources/2017/08/29/12/43/Expanding-Apprenticeship-Return-on-Investment-ROI>

ultimately provide education and workplace or simulated training that prepares individuals to enter into a RAP. Pre-apprenticeship programs may last a few weeks to months, and may or may not include wages or a stipend. At their core, pre-apprenticeship programs have varied program elements which place an individual on the potential career pathway to employability through a RAP.

To develop an updated definition and quality framework for pre-apprenticeship programs, the U.S. Department of Labor's (DOL) Employment and Training Administration (ETA) reviewed the Training and Employment Guidance Letter (TEGL) 13-16, *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA)*, the Quality Pre-Apprenticeship Training and Employment Notice (TEN) 13-12, and surveyed pre-apprenticeship programs currently operationalized throughout the various States. ETA also reviewed the 2017 Presidential Executive Order on Expanding Apprenticeships in America⁴ and the recommendations⁵ from the commissioned Task Force. Section 6 of this Executive Order states:

“The Secretaries of Defense, Labor, and Education, and the Attorney General, shall, in consultation with each other and consistent with applicable law, promote apprenticeships and pre-apprenticeship programs for America’s high school students and Job Corps participants, for persons currently or formerly incarcerated, for persons not currently attending high school or an accredited post-secondary educational institution, and for members of America’s armed services and veterans.”

Furthermore, the Executive Order’s commissioned Task Force on Apprenticeship Expansion recognized that to realize the full benefits of apprenticeships there should be “[f]ederal investment to specifically expand and support pre-apprenticeship activities in middle and secondary schools for career and technical education and/or other educational certificates...” The Department accepted these recommendations and this TEGL provides an update to the definition of a pre-apprenticeship program, provides examples of pre-apprenticeship program pathways to connect to RAPs, and comes into alignment with WIOA guidance.

ETA does not currently, nor is it planning to register or certify pre-apprenticeship programs or individuals participating in a pre-apprenticeship program. As a result, the quality of pre-apprenticeship programs must be assessed and/or ascertained by program participants. ETA intends for this TEGL to serve as a catalyst for pre-apprenticeship program providers to make linkages with RAPs. In issuing this notice and technical assistance, ETA seeks to improve the consistency and quality of pre-apprenticeship programs across the country.

⁴ See Presidential Executive Order on Expanding Apprenticeships in America, <https://www.whitehouse.gov/presidential-actions/3245/>

⁵ See Task Force on Apprenticeship Expansion Final Report to: The President of the United States , <https://www.dol.gov/apprenticeship/docs/task-force-apprenticeship-expansion-report.pdf>

- 4. Quality Framework for Pre-Apprenticeship Programs.** A pre-apprenticeship program⁶ is defined as a set of strategies designed to prepare individuals for entry into RAPs, and potentially other entry-level job opportunities. Pre-apprenticeship programs give potential apprentices the opportunity to remediate, improve, or gain new skills desired by organizations sponsoring RAPs. They may greatly differ from internships, job shadowing, externships, and co-ops that often offer individuals an opportunity to experience firsthand a profession or practice, but do not always engage in “real world” experiential learning.

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

- *Designed in Collaboration with RAP Sponsors.* Quality pre-apprenticeship programs are designed by organizations with input from a RAP sponsor. A pre-apprenticeship program’s educational and pre-vocational services prepare individuals to meet the entry requisites of one or more apprenticeship programs. They have training goals to teach participants a defined set of skills required and agreed upon by the RAP sponsor for entry into their programs. The start date and length of specific pre-apprenticeship programs may vary. Pre-apprenticeship programs ideally provide an industry-recognized credential⁷ and possibly stipends or wages.
- *Meaningful Hands-on Training 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 do not supplant a paid employee, but accurately simulate the industry and occupational conditions of the partnering RAPs while observing proper supervision and safety protocols.
- *Facilitated Entry and/or Articulation.* The purpose of a pre-apprenticeship program is to train individuals for entry into a RAP. A quality pre-apprenticeship program assists in exposing participants to local, state, and national apprenticeship programs and provides direct assistance to participants applying to those programs. When possible, formalized agreements⁸ exist with RAPs that enable individuals who have successfully completed the pre-apprenticeship program to enter directly into a RAP, and may include articulation agreements for earning advanced credit/placement for skills and competencies already acquired.
- *Sustainability through Partnerships.* To support the ongoing sustainability of a quality pre-apprenticeship partnership, these efforts collaboratively promote the use of RAPs as a preferred means for employers to develop a skilled workforce and to create career

⁶ Although not bound by WIOA definitions, the law does not define pre-apprenticeship programs but references it as a program eligible for funding youth workforce investment under Sec. 129 to support the attainment of a secondary school diploma or its recognized equivalent, entry into postsecondary education, and to provide career readiness for participants, <https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf>

⁷ An industry-recognized credential is a formal recognition of a person’s proficiency or competence in a given occupation or sector. Such a credential is widely accepted by a consensus of the relevant industry and/or sector and is nationally portable (e.g., not just locally or regionally recognized), which enables workers to move to another geographic location and still have their credentials recognized.

⁸ A "formalized agreement" between the Registered Apprenticeship Program and the pre-apprenticeship organization can be any form of documentation that clearly defines the obligations and expectations of each of the parties to the agreement.

opportunities and pathways for individuals. See the section below on the *Workforce System Partnerships with Quality Pre-Apprenticeship Programs and RAPs*.

- *Access to Appropriate Supportive Services*⁹. Quality pre-apprenticeship programs facilitate access to appropriate supportive services during the program, which may continue into a formal apprenticeship with a RAP. Services may include counseling, transportation assistance, childcare, and rehabilitative services.

Quality Pre-Apprenticeship Programs in Various Settings. A quality pre-apprenticeship program is designed to help individuals, including high school and college students, out-of-school youth¹⁰, adults, and dislocated workers enter a RAP. Organizations that run pre-apprenticeship programs may include high schools, post-secondary educational institutions, community- and faith-based organizations, employer associations, and labor-management organizations, as well as others (See also TEN No. 3-18, *Creating Industry-Recognized Apprenticeship Programs to Expand Opportunity in America* https://wdr.doleta.gov/directives/attach/TEN/TEN_3-18.pdf). A quality pre-apprenticeship framework for each group is discussed below, describing what elements should be part of a pre-apprenticeship program.

High School Pre-Apprenticeship Programs

High school students can participate in pre-apprenticeship programs to gain skills and knowledge leading to a RAP (See also TEN 31-16, *Framework on Registered Apprenticeship for High School Students*, https://wdr.doleta.gov/directives/attach/TEN/TEN_31-16_Acc.pdf). Many school districts across the country offer this opportunity in multiple industries. Quality high school pre-apprenticeship programs include:

⁹ Supportive services may refer to any service that assists participants to qualify for and maintain participation in a pre-apprenticeship and/or RAP. Broadly, supportive services are those intended to assist individual participants with an assessed or expressed need in order to ensure participants' success in completing the pre-apprenticeship program, gaining employment, acquiring necessary skills, or addressing any other identified barriers. Pre-apprenticeship organizations may directly provide supportive services 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. ETA has determined that YouthBuild programs that receive funding from the U.S. Department of Labor meet the requirements of this definition of pre-apprenticeship.

¹⁰ Although not bound by this definition, out-of-school youth in accordance with WIOA 129(a)(1)(B) means an individual who is— (i) not attending any school (as defined under State law); (ii) not younger than age 16 or older than age 24; and (iii) one or more of the following: (I) A school dropout. (II) A youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter. (III) A recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and is (aa) basic skills deficient; or (bb) an English language learner. (IV) An individual who is subject to the juvenile or adult justice system. (V) A homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6))), a homeless child or youth (as defined in section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2))), a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out of-home placement. (VI) An individual who is pregnant or parenting. (VII) A youth who is an individual with a disability. (VIII) A low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

- Training and curriculum based on industry standards¹¹ and approved by the documented RAP sponsor that will prepare students with the skills and competencies needed to enter one or more apprenticeship program(s).
- Students take courses for the purpose of their pre-apprenticeship program that are linked to a RAP, in addition to taking or being linked to their required high school coursework. These students receive high school credits.
- Students participate in On-the-Job Learning (OJL) activities beginning at age 16, which can count towards entry into a RAP. As students move through the program, they advance their OJL to become more skilled and more productive.
- Students may have opportunities to earn industry-recognized credentials and certifications¹².
- Students can apply to a RAP leading up to or upon high school graduation.
- Guidance counselors, teachers, and others within the school system work with students to support them through the pre-apprenticeship program.
- Post-secondary credits are awarded based on signed articulation agreements established between local school districts, post-secondary institutions, and RAPs.
- Strong recruitment strategies are focused on outreach to populations underrepresented in local, state, and national RAPs.

Post-Secondary Pre-apprenticeship Programs

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

- Training and curriculum based on industry standards and approved by the documented RAP sponsor that will prepare students with the skills and competencies needed to enter one or more apprenticeship program(s).

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 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 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 take courses for the purpose of their pre-apprenticeship program that correspond to a RAP and their required post-secondary coursework. These courses may or may not be for credit.
- Students may participate in OJL or simulation activities, which can count towards entry into a RAP. As students move through the program, they advance their OJL to become more skilled and more productive.
- Students may have opportunities to earn industry-recognized credentials.
- Students can begin participation in a RAP anytime during their Associate's or Bachelor's degree studies. Students can find available apprenticeship programs in their locality or elsewhere using the DOL's new [Apprenticeship Finder](#)¹³.
- Counselors, professors, and others within the post-secondary system work with students to support them through the pre-apprenticeship program.
- Strong recruitment strategies are focused on outreach to populations underrepresented in local, state, and national RAPs.

Out-of-School Youth, Adult and Dislocated Worker Pre-Apprenticeship Programs

Pre-apprenticeship programs for Out-of-School Youth and Adults can be offered by a variety of organizations, including industry associations, labor organizations, post-secondary educational organizations, training centers, and community-and faith-based organizations. DOL offers programs for out-of-school youth through YouthBuild and Job Corps that often serve as pathways to RAPs. Organizations that provide pre-apprenticeship programs for targeted populations should offer training and education that increases opportunities for targeted and under-represented populations, including veterans, minorities, women, individuals with disabilities, dislocated workers, as well as unemployed, disadvantaged, and low-skilled individuals, to access a RAP. Quality pre-apprenticeship programs for out-of-school youth and adults include:

- 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 apprenticeship program(s).
- Participants take courses for the purpose of their pre-apprenticeship program that are linked to a RAP.
- Participants, including students, are involved in OJL activities, which can count towards entry into a RAP. As participants move through the program, they advance their OJL to become more skilled and more productive.

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

- Participants, including students, may have opportunities to earn industry-recognized credentials.
- Participants can apply to a RAP after they finish the pre-apprenticeship program.
- Post-secondary credits are awarded based on signed articulation agreements established with post-secondary educational institutions and RAPs.
- Counselors, teachers, and others within the organization work with students to support them through the pre-apprenticeship program.
- Strong recruitment strategies are focused on outreach to populations underrepresented in local, state, and national RAPs.

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) to help them enter or reenter the workforce. Pre-apprenticeship programs can help individuals with barriers to employment develop the skills needed to successfully participate in and complete an apprenticeship program. ETA encourages the American Job Center network to familiarize itself with this definition and framework to support expanded partnerships between quality pre-apprenticeship programs and RAPs. WIOA title I programs including basic and individualized career services may support individuals with barriers to employment through participation in pre-apprenticeship programs.

For the WIOA Adult and Dislocated Worker programs, pre-apprenticeship programs are considered a training service, and may be funded using an individual training account (ITA) if they are on the state's list of eligible training providers (ETP). Pre-apprenticeship programs must follow the state's eligibility procedures to be added to the state's ETP list.

For the WIOA Youth program, a pre-apprenticeship program is considered a type of work experience. The WIOA youth program emphasizes work experience through a requirement to spend a minimum of 20 percent of local youth funds on work experience.

Supportive services are available for eligible WIOA participants enrolled in a RAP. Supportive services provide participants of WIOA activities with key assistance beyond career and training services necessary to achieve success including assistance with transportation or childcare, allow participants to successfully engage with WIOA career and training activities. WIOA-funded supportive services must be provided in accordance with TEGL 19-16 to enable WIOA adult participants to participate in career and training services.

The potential benefits of collaboration include:

- *Boosting training* - WIOA participants in pre-apprenticeship programs are counted as receiving training services for the WIOA Adult and Dislocated Worker programs.

- *Promoting diversity* - Pre-apprenticeship programs and RAPs offer career pathways for the diverse populations of adults and youth served by the WIOA programs.
- *Enhancing job placement* - WIOA participants who complete a pre-apprenticeship program and enter a RAP are counted as positive placements in the 2nd and 4th quarter employment indicators in a RAP.

Technical Assistance and Resource Materials. The Department continues to create resources and provide technical assistance materials to aid the American Job Center network to support expanded partnerships with quality pre-apprenticeship programs and RAPs. These materials include:

- The Apprenticeship.gov (<https://www.apprenticeship.gov/>) website has a webpage that allows for the posting of pre-apprenticeship programs to connect career seekers, employers, educators, and stakeholders in the workforce development system.
- The DOL High School Apprenticeship (<https://www.dol.gov/apprenticeship/high-school/>) webpage includes a factsheet, guide, and examples of high school apprenticeship programs.
- The Armed Services Vocational Aptitude Battery (ASVAB) (<https://doleta.gov/leave-doleta.cfm?target=http://www.military.com/join-armed-forces/asvab>) is used by the military to assess math and reading skills of recruits. These tests have been used successfully by the Los Angeles Women in Non-Traditional Employment Roles (WINTER) pre-apprenticeship program as part of its candidate assessment process.
- The Pre-Apprenticeship Panel Interview (https://doleta.gov/oa/preapp/pdf/ABCD_Building_Pathways_Program_Interview_Process_20151021.pdf) describes the interview panel approach used by the ABCD/Building Pathways program to evaluate pre-apprenticeship program candidates.
- The Helmets to Hardhats program (<https://doleta.gov/leave-doleta.cfm?target=http://www.helmetstohardhats.org/>) connects women and men from the Armed Forces with promising building and construction careers, and can be a valuable partner in efforts to recruit women veterans into pre-apprenticeship and apprenticeship programs.
- The Job Accommodation Network (<https://doleta.gov/leave-doleta.cfm?target=https://askjan.org/>) provides online and phone support for service providers, employers and individuals with disabilities regarding testing and workplace accommodations and accessibility options.
- YouthBuild Construction Plus Framework for a Quality Pre-Apprenticeship Experience (https://youthbuild.workforcegps.org/resources/2018/06/04/16/48/Construction_Plus_Framework_for_a_Quality_Pre-Apprenticeship_Experience). This document describes how

YouthBuild programs can apply the five elements of a quality pre-apprenticeship, as defined in Section 681.480 of the WIOA Final Rule, to develop training in additional in-demand industries beyond construction.

For more information, please visit <https://www.dol.gov/apprenticeship/>, and the [Apprenticeship.gov \(https://www.apprenticeship.gov/\)](https://www.apprenticeship.gov/) website.

Next Steps. ETA will continue to develop and disseminate information to promote quality pre-apprenticeship programs and RAPs.

5. **Inquiries.** Questions about this TEGL should be directed to Mrs. Michelle Mills Ajayi of the Office of Apprenticeship at (202) 693-3998 or mills.michelle.v@dol.gov.

6. **References.**

- TEN 13-12, *Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources* https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=5842
- TEN 31-16, *Framework on Registered Apprenticeship for High School Students* https://wdr.doleta.gov/directives/attach/TEN/TEN_31-16_Acc.pdf
- TEGL 13-16, *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA)* https://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=9125
- TEN No. 3-18, *Creating Industry-Recognized Apprenticeship Programs to Expand Opportunity in America* https://wdr.doleta.gov/directives/attach/TEN/TEN_3-18_Acc.pdf

7. **Attachments.** References