



POLICY

SECTION: WIOA and Business Services	POLICY# 019-C0041	PAGE: 1 of 5
TITLE: Apprenticeship Policy		EFFECTIVE DATE: 1.22.2020
REPLACES: N/A		DATED:

DISTRIBUTION: CAREERSOURCE TAMPA BAY STAFF

PURPOSE: To establish a local policy that identifies the distinguishable differences between Pre-Apprenticeship, Registered Apprenticeships (RA's) and Industry-Recognized Apprenticeship Programs (IRAP's) for CSTB staff. This will guide WIOA Adult, Dislocated Worker, Youth and Business Services staff in administering apprenticeship services.

BACKGROUND: In June 2017, President Trump signed an Executive Order (E.O.) on Expanding Apprenticeships in America, which lays out an expanded vision for apprenticeships in America. Training and Employment Notice (TEN) 3-18 Creating Industry-Recognized Apprenticeship Programs to Expand Opportunity in America was released on 7.27.18.

CareerSource Florida (CSF) encourages local workforce development boards (LWDBs) to partner with RA's and pre-apprenticeship programs as part of a career pathway for job seekers, and part of the job-driven strategy for employers and industries. CSF strategic vision for Apprenticeships is outlined in their Apprenticeship Strategic Policy 2019.02.13.A.1. This is further expanded in the CSF Administrative Policy On-the Job Training Policy #009 where there is significant reference to apprenticeships.

Apprenticeship is an arrangement that includes a paid-work component and an educational or instructional component, wherein an individual obtains workplace-relevant knowledge and skills. Apprenticeships have been proven to be an effective career pathway. Apprenticeships ensure a talent pipeline and strategies to retain high-skilled employees and promote organizational and industry-specific knowledge. It allows for the opportunity to align with the skill needs of industries in state or regional economies. An apprenticeship is an efficient and economical solution to give workers the skills they need for the jobs of today and the future, and to meet employers' needs for skilled labor.

POLICY:

There are three distinct approaches for apprenticeship training that may be used by CSTB to meet job seeker and employer needs, they are: Pre-Apprenticeship, Registered Apprenticeship and the Industry-Recognized Apprenticeship Program models.

Pre-Apprenticeship provides instruction and/or training to increase math, literacy and other vocation and pre-vocational skills need to enter a Registered Apprenticeship program. Registered Apprenticeship is a national training system the combines paid learning on-the-job and related technical and theoretical instruction in a skilled occupation. Registered apprenticeships are recognized on the Eligible Training Provider List (ETPL).

Industry-Recognized Apprenticeship models allows for expansion of apprenticeship opportunities into different targeted industry sectors where apprenticeships are already effective and substantially widespread.

Apprenticeship Programs are funded through WIOA and are designed to assist in the development of talent pipeline supply in industry sectors.

Pre-Apprenticeships

Pre-Apprenticeship is an organized program of instruction designed to prepare individuals, at least 16 years of age, to enter a program of study that prepares them for a Registered Apprenticeship program. A Pre-Apprenticeship program must be sponsored by a Florida based Registered Apprenticeship program and registered with the Florida Department of Education, Office of Apprenticeship Section.

Pre-Apprenticeship program may or may not include on-the-job training and are designed to range in length from six months to a maximum of two years, however there is a required minimum number of completion hours and typically tied to the school year/semester schedule.

The program can be offered within a secondary or post-secondary educational school system, labor organization or in-house. The program may be offered to youth (16-23 years of age), adults (24 of age or older), or a combination of both. Pre-Apprentices who complete the program will receive a certificate from the Florida Department of Education and may be given advance standing for entrance into a Florida-based Registered Apprenticeship program.

A pre-apprenticeship program must have at least one registered apprenticeship partner and must include:

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

Pre-apprenticeships that include an academic and occupational component may be used to meet the 20% youth work experience requirement.

Pre-apprenticeship program providers who offer occupational skills training are required to meet WIOA ETPL requirements. They do not have the same automatic eligibility for ETPL under WIOA as the registered apprenticeship programs.

Pre-apprenticeship programs are most appropriate for youth and adults with barriers to employment who are identified as needing certain skills or credentials to successfully enter and complete a registered apprenticeship program. Pre-apprenticeship is also appropriate for dislocated workers transitioning to new industries or occupations in need of new skills.

Registered Apprenticeships

Registered apprenticeships are 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 individually in this Act as an “apprenticeship”, except in section 171). Registered apprenticeships are employer-driven, “learn while you earn” models that combine OJT with job-related instruction, while combining the attainment of industry-recognized skills standards attained. Registered apprenticeship programs are to be included and maintained on the Eligible Training Providers List (ETPL) as long as the corresponding program remains registered.

Registered apprenticeships are deemed most appropriate for youth age 16 and older, adults and dislocated workers, veterans in receipt of the GI Bill, unemployed workers, underemployed workers (including long-term unemployed), and incumbent workers.

Prior to enrolling a participant into a registered apprenticeship activity, CSTB must ensure that the registered apprenticeship includes the work component (on-the-job training), the job related instruction, and may provide an individual training account (ITA) for the participant to receive apprenticeship training. Students enrolled in Florida Department of Education approved apprenticeship programs, as defined in Florida s.446.021, are exempt from the payment of tuition and fees. The OJT component of this apprenticeship model must be under the supervision of a skilled worker.

Registered apprenticeship programs must meet parameters established under the National Apprenticeship Act and regulations (29-CFR-29 and 29-CFR-30), which are administered by the USDOL Office of Apprenticeship or a State Apprenticeship Agency approved by the Secretary of Labor for federal purposes.

An apprentice occupation is considered to be one which is specified by industry and which must:

- a. Involve skills that are customarily learned in a practical way through a structured systematic program of on-the-job supervised learning;
- b. Be clearly identified and commonly recognized throughout an industry;
- c. Involve the progressive attainment of manual, mechanical, or technical skills and knowledge which, in accordance with the industry standard for the occupation, would require the completion of at least 2,000 hours of on-the-job learning to attain; and
- d. Require related instruction to supplement the on-the-job learning.

Industry-Recognized Apprenticeship Programs

Industry-Recognized Apprenticeship Program participants are not to be considered apprentices for the purpose of meeting the Davis-Bacon Act wage requirements. The purpose of Industry-Recognized Apprenticeship Programs is to create an additional pathway to encourage expansion of apprenticeships into targeted industry sectors. Industry-Recognized Apprenticeship Programs are not registered apprenticeships, unless it meets the standards and requirements in 29 CFR part 29. This apprenticeship model is developed, delivered and administered by third parties, which may include, trade and industry groups, companies, non-profit organizations, educational institutions, unions and joint labor-management organizations. It is certified as a high-quality program by a third-party certifier that has received a favorable determination from DOL. DOL considers a high-quality program to include but not limited to paid work, work-based learning, mentorship, education and instruction, and industry-recognized credentials.

Industry-Recognized Apprenticeship Programs are supported/sponsored by trade and professional associations, employers, educational institutions, unions, labor management organizations and other third parties, and may be offered and certified by third parties that received a favorable determination from DOL. Unlike Registered Apprenticeships, this model is not registered with the Florida Department of Education, Office of Apprenticeship Section.

An Industry-Recognized Apprenticeship Program sponsor must follow the process outlined in the Administrative Policy 090-WIOA Eligible Training Provider List to receive WIOA training funds or an ITA. Industry-Recognized Apprenticeship Programs are not automatically included on the ETPL.

Funding:

CSTB may use any allowable activities to support apprenticeships and pre-apprenticeships to supply the talent pipeline needed in our local area. CSTB may fund registered apprenticeships through customized training, On-the-Job training (OJT), and Incumbent Worker Training (IWT). If a registered apprenticeship is funded through an OJT path, then CSTB is required to specify the length of the apprenticeship in the duration of the OJT contract design.

Under WIOA, CSTB utilizes the self-sufficiency definition outlined in the Region 15 Local Workforce Services Plan to process applicant's that are self-employed. In addition, CSTB can provide services to an applicant who is self-enrolled into a Registered Apprenticeship program, as long as the applicant meets WIOA Adult or WIOA Dislocated Worker eligibility. A participant's eligibility for WIOA must be properly established and documented prior to the commitment of funds.

The CSTB ITA Cap applies to program participants enrolled into Pre-Apprenticeship and Registered Apprenticeship programs. However, the training duration doesn't apply to these programs as the training duration can last up to 5 years to complete the entire program. Historically, CSTB RA funded ITA duration ranges between 3-5 years with minimal investment per program year. Students that are enrolled in Florida Department of Education approved apprenticeship programs, as defined in FS 446.021, are exempt from the payment of tuition and fees.

Under the IRAP model, CSTB may fund:

- a percentage of the apprenticeships wages through On-the-Job Training (OJT)

- a percentage of related training instruction through Customized Training (CT)
- Individual Training Accounts (ITA) may fund the related training instruction
- Incumbent Worker Training may be used to fund training of individuals already working with the employer

Supportive Services:

Limited supportive services required for participation in the program may be considered on a case-by-case basis for a program participant enrolled in an apprenticeship program. CSTB staff will review the request and ensure that all requirements outlined in CSTB's Supportive Service and Incentive Policy #018-C0012 are met.

References:

- CSF Apprenticeship Policy 2019.02.13.A.1
<https://careersourceflorida.com/wp-content/uploads/2019/02/Apprenticeship-Policy-2019.02.13.A.1.pdf>
- CSF Registered Apprenticeships and Industry-Recognized Apprenticeship Programs: Frequently Asked Questions
<https://careersourceflorida.com/wp-content/uploads/2019/02/FAQs-Registered-Apprenticeships-and-IRAP-020119.pdf>
- WIOA Public Law 113-128
<https://www.gpo.gov/fdsys/pkg/PLAW-113publ128/pdf/PLAW-113publ128.pdf>
- 29 U.S.C. 50, Promotion of Labor Standards of Apprenticeship
<https://www.govinfo.gov/content/pkg/USCODE-2010-title29/pdf/USCODE-2010-title29-chap4C.pdf>
- Presidential Executive Order 13801 – Expanding Apprenticeships in America
<https://www.whitehouse.gov/presidential-actions/3245/>
- Chapter 445.004, Florida Statutes
http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0400-0499/0445/0445.html
- Chapter 446, Florida Statutes
http://www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&URL=0400-0499/0446/0446.html
- Chapter 6A-23.00-011, Florida Administrative Code
<https://www.flrules.org/gateway/ChapterHome.asp?Chapter=6A-23>
- Training and Employment Guidance Letter No. 13-16
https://wdr.doleta.gov/directives/attach/TEGL/TEGL_13-16_acc.pdf
- Training and Employment Notice No. 3-18 Creating Industry-Recognized Apprenticeship Programs to Expand Opportunity in America
https://wdr.doleta.gov/directives/attach/TEN/TEN_3-18.pdf
- 29-CFR-29- Labor Standards for the Registration of Apprenticeship Programs
<https://www.gpo.gov/fdsys/pkg/CFR-2017-title29-vol1/pdf/CFR-2017-title29-vol1-part29.pdf>
- 29-CFR-30- Equal Employment Opportunity in Apprenticeship
<https://www.gpo.gov/fdsys/pkg/CFR-2017-title29-vol1/pdf/CFR-2017-title29-vol1-part30.pdf>

INQUIRIES: Any questions about this procedure should be directed to the Chief Operating Officer or their designee.