

Advance CTE Federal Apprenticeship Policy Recommendations

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The National Apprenticeship Act (NAA) was last updated in 1937. Long overdue for a comprehensive update that reflects the growing workforce needs of the modern economy, the NAA authorizes the U.S. Department of Labor (DOL) to administer and oversee a system of registered apprenticeship programs (RAPs). Widely recognized as an effective “earn-and-learn” strategy for workforce development, RAPs—along with federal legislation that authorizes and invests in them—must significantly evolve to meet the needs of today’s learners, workers, and employers who desperately require more equitable postsecondary pathways into family-sustaining employment. Career Technical Education (CTE) and apprenticeship have a long and interconnected relationship that future legislation must recognize and build upon. This interconnectedness is reflected in Advance CTE’s national vision for CTE, *Without Limits: A Shared Vision for the Future of Career Technical Education* (CTE Without Limits), which recognizes the importance of creating a more tightly coordinated and aligned career preparation ecosystem.

As Congress considers updating the NAA to meet today’s challenges and more thoughtfully connect all forms of apprenticeship with this ecosystem, Advance CTE, representing the state leadership for secondary, postsecondary, and adult CTE in all 50 states, the District of Columbia, and the U.S. territories, offers the following recommendations for future federal legislation:

Create Enduring Change for a Sustainable Apprenticeship Ecosystem

- **Legislative Solutions Needed:** The U.S. Department of Labor has recently made efforts to comprehensively update rules and regulations for Registered Apprenticeship Programs (RAPs), including by proposing new models of apprenticeship that may implicate CTE in new and profound ways. These efforts underscore an ongoing challenge with apprenticeship programs in the United States—the model has almost exclusively been advanced via federal regulation rather than legislation. As a consequence, a complex system of regulations and related compliance requirements for registered apprenticeship programs has been constructed over the last century. Advance CTE strongly believes that Congress should act with urgency to codify aspects of existing apprenticeship regulations that make sense, while significantly streamlining what has become an overly bureaucratic system focused on compliance rather than program quality and related outcomes. Equally as important, federal legislation provides the opportunity for Congress to invest in apprenticeship programs—an important financial support structure that is absent among current federal efforts to oversee and administer these programs.

Strengthen States' Role in the Apprenticeship Ecosystem

- **Formalize the Federal Investment in Apprenticeships:** Congress should provide for an ongoing and foundational investment in all forms of apprenticeship, including pre- (PA) and youth (YA) apprenticeship programs. These grant funds should be allocated to states on a formula basis based on population size and need, including the level of unemployment, particularly youth unemployment, in each state. Such funding should require the development of state apprenticeship plans that articulate how and in what ways States would use these resources to grow apprenticeship opportunities and increase access to them.
- **Coordinate Apprenticeship Funding with Other Federal Investments:** States receiving funding from a new federal investment in apprenticeships should be required to develop statewide apprenticeship plans in exchange for formula funding. In addition to an explanation regarding how States would use these funds to increase access to and opportunities within apprenticeship programs, these plans should be required to articulate how and in what ways state apprenticeship efforts will be aligned to and coordinated with other major federal investments such as those made by the Carl D. Perkins Act (Perkins V), Workforce Innovation and Opportunity Act (WIOA), the Every Student Succeeds Act (ESSA), and other state-level education and workforce development initiatives.
- **Recognize and Reward Quality:** Approved apprenticeship programs that meet clearly defined quality criteria, including but not limited to factors such as compelling employment or earnings outcomes for learners or special populations, should therefore be authorized to operate in all states receiving federal apprenticeship funding. Such an effort could conceivably be facilitated by DOL through the compilation of a national repository for quality apprenticeship programs that would be automatically eligible to operate in states that receive federal formula funding from a new NAA. Moreover, maintaining the ability to register programs with a multistate or national scope should be maintained and expanded in future legislation.
- **Promote State Reciprocity:** Recognizing the diversity of state apprenticeship systems—with roughly half of states administering apprenticeship programs directly via SAAs, and others allowing DOL's Office of Apprenticeship to serve this function—future NAA legislation should preserve these existing flexibilities while balancing the need for scaling high-quality apprenticeship experiences across the nation. A new NAA should therefore encourage and incentivize states to develop and implement reciprocity agreements to ensure that high-quality apprenticeships approved in one state can be made available to learners residing in other states. This would complement efforts to better support national programs as noted earlier while also promoting a more cohesive apprenticeship system.
- **Integrate Apprenticeships and Postsecondary Education:** In recent years, policymakers have begun to recognize the importance of [providing postsecondary credit for relevant apprenticeship experiences](#), especially for the required classroom-based instruction component of RAPs (e.g. Related Technical Instruction /

RTI). This initially took shape with the establishment of the [Registered Apprenticeship College Consortium \(RACC\)](#)—an initiative our organization believes should serve as a foundational model for providing financial incentives for institutions of higher education to participate. In addition, Congress should establish additional state-level incentives for connecting postsecondary education systems and apprenticeships, particularly through strategies such as prior learning assessment/credit for prior learning, formalized credit transfer agreements for apprenticeship experiences, and incentives to incorporate apprenticeships into wider postsecondary education initiatives, such as college promise programs.

- **Maximizing the Impact of the Federal Investment:** A new NAA should provide flexibility and financial incentives for states to blend and braid federal and state funding in support of apprenticeship programs and related on-ramps. These efforts could be modeled off and should be informed by lessons learned from earlier federal efforts to serve disconnected youth via Performance Pilot Partnerships (P3). Such efforts should necessarily prioritize the provision of supportive and wraparound services that may be needed to ensure apprentice success while enrolled in a program or related pathway.

Establishing Standards, Promoting Best Practices, and Creating Sustainable Financial Supports

- **Streamline Registration Process:** An often-cited challenge in the apprenticeship space relates to the existing apprenticeship registration process administered by DOL's Office of Apprenticeship (OA) and SAAs. At the same time, the existing apprenticeship registration process serves a critical quality assurance function in helping to ensure that apprenticeship programs lead to opportunity for all learners. A future NAA should balance both of these needs by updating and streamlining the existing standards for registered apprenticeships in ways that shorten the time for approval and promote continuous improvement by clarifying expectations around program review and de-registration. These efforts should also provide a clearer value proposition for employers undertaking a formal registration process such as by providing more comprehensive financial support for classroom-based instructional components of apprenticeship programs. Further, we believe there should be flexibilities in new apprenticeship legislation that allow new programs to be piloted for a specified period of time prior to formal registration.
- **Establish Definitions and Related Expectations for Youth- and Pre-Apprenticeships:** States and stakeholders across the nation lack a common understanding of what constitutes a youth or pre-apprenticeship experience. Future NAA legislation should provide clear definitions and related expectations for both YA and PA, which we believe should be aligned to the Partnership to Advance Youth Apprenticeship's (PAYA) existing [principles for high-quality youth apprenticeship](#). New legislation should encourage federal agencies to issue nonregulatory guidance and elevate state-level best practices to facilitate the integration of younger learners into apprenticeship programs and related pathways such as these.

- Clarify Role and Support for Intermediaries:** Intermediaries serve an important role and function in the delivery of apprenticeship programs, helping to reduce burden on employers while also working to ensure learner success. Future legislation should clarify and define what these entities are, the roles they should play in the wider apprenticeship ecosystem, strategies regarding how to identify and support intermediaries, and how federal funding can best be used to support these important functions. States should play a central role in determining intermediary eligibility and in defining core functions within their respective State systems.
- Addressing Legal Hurdles:** Apprentices, especially those enrolled in a PA or YA program, are often under the age of 18 which can present challenges for states and stakeholders seeking to implement apprenticeships. These challenges typically relate to the legality of minors engaging in work and the types of work environments appropriate for those under the age of 18. Congress should therefore ensure that future legislation directs DOL to provide ongoing technical assistance and support, including the issuance of subregulatory guidance, for how states can and should navigate these potential legal obstacles. Additionally, these efforts should include technical assistance and related support for employers, including insurance underwriters and legal counsel, to help further promote the expansion and use of apprenticeships.

Expanding Apprenticeship Models for New Populations and Industries

- Expand Apprenticeship Models into New and Emerging Economic Sectors:** Despite encouraging trends in recent years, the majority of the top 30 occupations with active apprenticeship programs remain in the building construction and related trades industries. To better maximize the potential of the apprenticeship system across economic sectors, future legislation should provide new competitive funding to intentionally promote the expansion of apprenticeship programs into economic sectors that have traditionally underused the model. Such efforts should also seek to align with and build upon existing efforts to establish [occupational skills frameworks](#), especially for emerging industries and sectors of the economy that have historically not used apprenticeships, to facilitate these expansion efforts. Competitive funds should be tiered in ways that provide additional resources for programs and efforts for in-demand occupations and economic sectors, including wider societal need, and incentivize to the extent possible other program quality elements such as the availability of postsecondary credit. Given the nature of many emerging occupational sectors these funds should, to the greatest extent possible, prioritize, and incentivize efforts to accelerate time to completion such as through competency-based models and related efforts.
- Provide More Opportunities for Communities Underserved in Apprenticeships:** The vast majority of active apprentices remain White and predominantly male. Competitive funding made available for the expansion of new apprenticeships into fields where apprenticeships are underused should also allow for and include explicit strategies to attract and retain a more diverse apprentice population to better reflect the current and future American workforce. Finally, these efforts should be

supported in a new NAA by directing federal agencies to issue subregulatory guidance, elevate best practices, and provide technical assistance and related supports to help states and other apprenticeship stakeholders ensure historically underserved communities and populations can enroll and be successful in apprenticeship experiences.

- **Reform Federal Postsecondary Financing to Support Apprenticeship:** At present the federal government provides a significant amount of funding and related financing to learners pursuing two- and four-year degree programs. Relatively little is currently made available for the majority of learners pursuing equally valuable nondegree pathways and related credentials. Future NAA legislation should therefore make conforming amendments to other relevant federal investments, particularly the Higher Education Act (HEA), to ensure that apprenticeship programs can be financed using existing federal funding streams such as those provided under Title IV of HEA and the legislation's federal work-study program.
- **Incentivize the Public Sector to Lead by Example:** As shortages of skilled workers continue to persist in critical public sector occupations such as teaching, policymakers should do more to ensure that apprenticeships can be leveraged to help address these needs. To achieve this future NAA legislation should include an explicit focus on expanding apprenticeships into public sector occupations, as leading states such as **Maryland** have done with [its Public Sector Apprenticeship Innovation Fund](#). In addition, future legislation should incentivize all levels of government to include employment targets for candidates emerging from apprenticeships. These efforts are particularly well suited to benefit rural communities where limited private sector employment opportunities may exist.

Data and Innovation

- **Expand Data Collection and Related Public Reporting:** In recent years DOL has made [significant strides to improve data collection and related reporting](#) via the Registered Apprenticeship Program Information Data System (RAPIDS). Future NAA legislation should build upon these modernization efforts and work to collect data on all forms of apprenticeship, including pre-apprenticeships and youth apprenticeships in RAPIDS if they are connected to or aligned with a program that has undergone registration. In addition, future legislation should direct DOL to make these data and related information available in a more timely manner to allow stakeholders to adjust and refine strategies based on real-time data. Such improvements to public reporting should intentionally disaggregate related data which would help employers and prospective apprentices understand apprenticeship opportunities while also supporting policymakers make more data-driven decisions.
- **Harmonize Credential Data:** RAPs culminate in the attainment of an apprenticeship completion certificate— a nationally recognized and portable credential of value. Changes to the existing RAP regulatory framework also allow for interim credentials and certifications to be earned by apprentices during the duration of their program as a way to gradually certify progress and increase employability opportunities— a



change Congress should carry forward in future legislation. Credentials can also be earned in youth and pre-apprenticeship experiences but given the uncertainty regarding how these programs are structured there are sometimes greater variations in the level of quality and value of these credentials.

With over one million credentials available in the United States, and many apprenticeship programs conferring additional credentials beyond a completion certificate, future legislation should require that all programs use standardized, linked, open, and interoperable data standards and schema to report on credentials earned during an apprenticeship program. This would allow learners and policymakers to more easily compare credentials and objectively determine quality and value while also being conducive to wider skills-based hiring initiatives underway in many states, including the federal government.

- **Supporting Innovation and Elevating Best Practices:** The existing registration process for apprenticeship programs serves an important quality assurance function. However, many more apprenticeship programs currently operate outside of this federal context. Recognizing the important diversity of apprenticeship, future federal legislation should provide adequate flexibility and financial support for state and local apprenticeship stakeholders to experiment and test out new and innovative strategies and related approaches for delivering apprenticeship experiences that do not fully align with future registration requirements.

New NAA legislation could be modeled off of current experimental site authorities, as structured in the HEA, to make these efforts possible. This is particularly crucial as a means to compare and contrast learner outcomes between registered and unregistered models of apprenticeship. New funding for innovative approaches to apprenticeship should also explicitly include support for efforts such as competency-based assessment and other ways to accelerate learners' time to full productivity. Finally, future legislation should collect and disseminate best practices, lessons learned, and other successful examples from the field to continue to drive continuous improvement.

Advance CTE represents state and territory leaders of CTE through leadership and advocacy that supports an innovative and rigorous CTE system that prepares students for both college and careers. State CTE Directors lead the planning and implementation of CTE in their respective states and these recommendations reflect their priorities.

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