

WIOA Guidance Letter 17-01



DATE: August 3, 2017
TO: LWDB Executive Directors
FROM: Mike Beene, Director Workforce Services
CC: Workforce Services, Fiscal, CRC
RE: Registered Apprenticeship

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Purpose: The purpose of this Guidance Letter is to provide information to Local Workforce Development Boards (LWDBs) regarding Registered Apprenticeship programs and the various ways that LWDBs can integrate Registered Apprenticeship programs into WIOA Title I programs.

References: WIOA Section 122(a)(3); TEGL 19-16; State Policy #5-02-00

Background: Registered Apprenticeship is a unique, flexible training system that combines job related technical instruction with structured on-the-job learning experiences. The Registered Apprenticeship system provides the opportunity for workers seeking high-skilled, high-paying jobs and for employers seeking to build a qualified workforce. In this regard, the Registered Apprenticeship system effectively meets the needs of both employers and workers.

Registered Apprenticeship should be integrated with WIOA Title I programs, and this Guidance Letter will highlight some of those methods.

Registered Apprenticeship

Registered Apprenticeship (RA) is an important component of potential training and employment services that the workforce system can provide to its customers. LWDBs are encouraged to partner with the RA system and use RA opportunities as a career pathway for job seekers and as a job-driven strategy for employers and industries. RA can be funded through several mechanisms. Section 122(a)(3) of WIOA also provides a new opportunity for RA programs to be more directly connected to the public workforce system. As RA programs, they are automatically eligible for inclusion on the Eligible Training Provider List, if they choose to be, allowing Individual Training Accounts (ITAs) to support participants in RA programs, and more directly connect those programs to the American Job Center network.

Eligible Training Provider List

RA Program sponsors can be Eligible Training Providers (ETPs). Some examples of typical RA Program sponsors are:

- **Employers who provide related instruction:** A number of employers with RA programs provide formal in-house instruction as well as on-the-job training (OJT) at the work site.
- **Employers who use an outside educational provider:** Under this model, RA program sponsors do not provide the related instruction or educational portion of the apprenticeship, but rely upon an outside educational entity to deliver instruction. Employers can use two- or four-year post-secondary institutions, technical training schools or on-line courses for related instruction. Under this formulation, the employer is the ETP and must identify their instructional provider.
- **Joint Apprenticeship Training Programs:** These programs are made up of employers and unions. They have an apprenticeship training school where the instructional portion of the apprenticeship program is delivered. The training schools are usually administered by the union, in which case the union would be the ETP. Multiple employers can be a part of the same Joint Apprenticeship Training Program.
- **Intermediaries:** Intermediaries can serve as program sponsors when they take responsibility for the administration of the apprenticeship program. They also can provide expertise such as curriculum development, classroom instruction and supportive services, as appropriate. The intermediary is the ETP and must identify the instructional provider if an outside organization is providing the educational portion of the apprenticeship. Intermediaries include:
 - Educational institutions including two- and four-year post-secondary institutions or technical schools. In this model, the educational institution administers the program, works with employers to hire apprentices and provides classroom or on-line instruction for the apprenticeship program;
 - Industry associations that administer the program and work with employer/members and educational entities to implement the apprenticeship program; and
 - Community-based organizations that administer the program and work with employers, educational entities and the community to implement the apprenticeship program.

RA programs that wish to be on the ETPL should follow the policy and procedures as outlined in State Policy #5-02-00. The State Apprenticeship Director shall authorize removal of any apprenticeship program that fails to retain its status as a Registered Apprenticeship.

Integrating RA and WIOA Programs

LWDBs should fully integrate RA programs as an employment and training solution for American Job Centers. Staff at American Job Centers should know about the RA programs that exist in their local area and be able to provide that information to job seekers.

American Job Center centers may make arrangements with RA programs to initiate applications to RA programs on behalf of participants. Local areas have maximum flexibility to serve participants and support their placement into RA programs.

Given the unique nature of RA, there are several ways in which training services may be used in conjunction with these programs:

- An ITA may be developed for a participant to receive RA training;
- An OJT contract may be developed with a RA program for training participants. OJT contracts are made with the employer or RA program sponsor, and RAs generally involve both classroom and on-the-job instruction. The OJT contract may be made to support some or all of the OJT portion of the RA program;
- A combination of an ITA to cover the classroom instruction along with an OJT contract to cover on-the-job portions of the RA is allowed; and
- Incumbent worker training may be used for upskilling apprentices or journey workers who already have an established working/training relationship with the RA program.

Local areas may also include supportive services, in coordination with career and/or training services, to participants in a RA program. These supportive services must be consistent with Federal and State regulations as well as local supportive service policies.

Promoting RA Program

LWDBs should actively promote RA programs to job seekers, and Business Service staff should also promote the development of new RA programs to local area employers. LWDBs should look for ways to bring employers together who might have an interest in developing new RA programs. Once an employer expresses an interest in developing a new RA program, RA Program Specialists will work with the employer to ensure all the criteria for apprenticeship and standards for the program are met.

Questions about this Guidance Letter or the Registered Apprenticeship program should be directed to Gary Westerman, Registered Apprenticeship, (785) 230-9456, e-mail gary.westerman@ks.gov