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**WIOAPL 21-03 (State-Recognized Pre-Apprenticeship)
Workforce Innovation and Opportunity Act Policy Letter No. 21-03**

**TO: Local Workforce Development Boards Directors
Fiscal Agents
OhioMeansJobs Center Operators**

FROM: Matt Damschroder, Director

SUBJECT: State-Recognized Pre-Apprenticeship

ATTACHMENT: State Recognized Pre-Apprenticeship Glossary

I. Purpose

This policy letter is issued as guidance to local workforce development areas (local areas), regarding the criteria for state recognition of effective pre-apprenticeship programs that prepare individuals to succeed in Registered Apprenticeship training. This information is meant to assist in the development of local area policies on the use of pre-apprenticeship training in WIOA, in the Comprehensive Case Management and Employment Program (CCMEP), in other employment and training services, and in fulfilling state standards for secondary education attainment.

II. Effective Date

Immediately

III. Background

Registered Apprenticeship (RA) is a training model combining on-the-job training with related classroom instruction. RA has a long history of effectiveness providing the skills that workers need to compete successfully in technical occupations.

RA programs for certain occupations have historically had difficulty enrolling and graduating enough apprentices to meet the labor demands of employers. The apprentice shortage is caused in part by a lack of public awareness about the benefits of RA training, and by gaps in the preliminary skills necessary to qualify for enrollment. Pre-apprenticeship combines basic skill instruction, work experience, pre-occupational training, and public and private supportive services, to maximize individual chances of successful apprenticeship training.

Ohio is a national leader in identifying and promoting best practices for pre-apprenticeship. In response to the need for qualified training applicants, Ohio RA sponsors have been active in building local pre-apprenticeship programs. Their experience and that of other experts nationwide, enabled the Ohio State Apprenticeship Council (OSAC) in 2012 to formulate procedures and criteria for state recognition of high-quality pre-apprenticeship programs. That OSAC action forms a basis for the present policy letter.

This letter relates and expands on the OSAC criteria, and provides resources and guidelines for applying the pre-apprenticeship model in WIOA and CCMEP activities for youth and adults; in Career and Technical Education (CTE) systems; and in federally funded career services including but not limited to those connected with Temporary Assistance for Needy families (TANF), Trade Adjustment Assistance (TAA), Rehabilitation Services, the Community Services Block Grant (CSBG), Housing and Urban Development Employment and Training (HUD E&T) programs, and Department of Agriculture (USDA) Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T).

IV. State Requirements

The State of Ohio is committed to facilitating its citizens' access to the proven advantages of Registered Apprenticeship training. Quality pre-apprenticeship programs can provide an important bridge to apprenticeship for Ohioans.

The goal of State Recognized Pre-Apprenticeship is to provide the skills and work experience needed to be successful in a Registered Apprenticeship program.

Though pre-apprenticeship training is not subject to laws governing the Registered Apprenticeship system, it has a direct effect on stakeholders in that system. For the benefit of those stakeholders - the workers, employers, and apprenticeship sponsors of Ohio - the Ohio Department of Job and Family Services (ODJFS) establishes the following means to identify and publicly recognize quality pre-apprenticeship training. The procedures described are to be overseen by the Department's ApprenticeOhio Unit, which is also identified in state rules as the Council Office.

Eligibility for Recognition

To be eligible for state recognition of quality training, a pre-apprenticeship program must be conducted in conformity with an operating plan that describes the program's objectives and practices, and that meets the following criteria.

(A) Equal Employment Opportunity (EEO) -- The plan must contain the following equal opportunity pledge as defined in OAC 5101:11-5-01 for Registered Apprenticeship programs, to be applied to trainees of the applicant pre-apprenticeship program, and must also include provisions for ensuring fairness and affirmative action in recruitment, selection, and treatment of trainees.

"In the recruitment, selection, employment, treatment, and training of apprentices [Name of sponsor] will not discriminate based on race, color, religion, national origin, sex (including pregnancy and gender identity), sexual orientation, genetic information, disability, Hispanic ethnicity, or age above forty years. [Name of sponsor] will take affirmative action to provide equal opportunity in apprenticeship, and will operate the apprenticeship program as required under Title 29 of the Code of Federal Regulations, part 30, and the equal employment opportunity regulations of the state of Ohio."

(B) Enrollment -- The operating plan must state the criteria for eligibility to enroll in the program, and describe the application, selection, and enrollment procedures. All methods used in, and leading to, the selection of applicants for pre-apprenticeship, shall be applied consistently and fairly, and shall be subject to approval by the Council Office.

(C) Instructional content -- The operating plan shall describe the details of training, to include:
(1) the apprenticeable occupation(s) or occupational sector(s) for which participants will be

- trained;
- (2) a definition of progressive stages of training and criteria for enrollment at any of those stages;
 - (3) a procedure for periodically evaluating each pre-apprentice's progress in the program, including his/her performance in work activities and related instruction, and for keeping adequate records of this progress.
 - (4) an instructional design that:
 - (a) is aligned with prevailing industry standards for one or more targeted career cluster(s) as defined by the Bureau of Labor Statistics (BLS) and reflected in the ONet occupational data system (links to related details are provided in the "Further Information" section below);
 - (b) specifies the competencies that the program will impart, categorized by type (e.g., basic academic, technical, job-readiness, etc.) and defined in terms of the Knowledge, Skills, Abilities (KSA) framework (see "Further Information" section);
 - (c) describes the basic format(s) of instruction, with a general break-down by practical instruction (hands-on, work experience, labs, etc.) and theoretical instruction (classroom, reading, etc.);
 - (d) presents an evaluation methodology detailing the selection and use of skill assessment tools to be used before, during, and at the end of training;
 - (e) describes formal structured work experience in the occupation(s) or occupational sector(s) addressed by the program, to be delivered through paid or unpaid internships or, in situations where clearly defined safety issues are recognized, and with the permission of the Council Office, through extensive job-shadowing;
- (D) Job readiness skills** -- The operating plan shall describe provision or referral for services that address, where appropriate, deficits in pre-employment and soft skills.
- (E) Supportive services** -- The operating plan shall describe partnerships with programs that provide, or refer participants to, support services such as economic assistance, childcare, transportation, food banks, and other resources for meeting practical needs that might affect participation. Potential partner programs include, but are not limited to, WIOA, CCMEP, and non-profit service organizations.
- (F) OhioMeansJobs Centers** -- The plan shall ensure participant referral to the relevant OhioMeansJobs Center(s) where appropriate for access to services that may facilitate preparation for RA training. The plan shall describe how the program provider will coordinate with the OhioMeansJobs Center(s) in terms of strategy and information sharing, to stream-line services for pre-apprenticeship participants. Contact information for OhioMeansJobs is provided in the "Further Information" section.
- (G) Participant status** -- The operating plan shall provide clear procedures for reporting to the Council Office regarding pre-apprentices in the program, including:
 - (1) information about each trainee at the point of enrollment, including name, age, education level, and in what stage of training the individual will be placed;
 - (2) notice of each trainee's exit from the program, along with their training status (completed, suspended, or canceled before completion);
 - (3) documentation of skill attainments in the program, based on the competencies and progressive stages outlined in the details of training.
- (H) Safety and welfare** -- The plan shall state specific provisions for training all pre-apprentices in safety practices appropriate to their occupation(s), and for ensuring that all equipment and

facilities used in the program are adequate and safe.

(I) Program administration -- The plan shall include:

- (1) the official name and contact information for the provider organization;
- (2) the name, title, and contact information for the person authorized to represent the program provider in matters relating to state recognition.

(J) Linkage -- The plan shall include a linkage statement attesting to and describing the following forms of cooperation with partner entities.

- (1) The program and instructional content must be approved by, and developed in collaboration with, one or more Registered Apprenticeship sponsor(s), and
 - (a) for programs serving in-school youth, the curriculum experts of the joint vocational educational agency and/or local education agency;
 - (b) for programs serving adults and/or out-of-school youth, the University System of Ohio (USO).
- (2) The work experience component of training must be approved by one or more Registered Apprenticeship sponsor(s).
- (3) The program must engage in ongoing collaboration with one or more Registered Apprenticeship sponsor(s) in the relevant industry(s) for the purpose of:
 - (a) ensuring the relevance of pre-apprenticeship instruction to the skill expectations of the Registered Apprenticeship sponsor(s);
 - (b) familiarizing pre-apprentices with the procedures for entering and completing such programs;
 - (c) ensuring continued appropriateness and safety of activities in the pre-apprentice's work experience component of the training.

The linkage statement shall be signed by the authorized representative(s) of the cooperating Registered Apprenticeship sponsor(s).

Ohio's Registered Apprenticeship sponsors are listed online at <https://ohiomeansjobs.ohio.gov/job-seekers/practice-your-skills/occupation-search>. For questions on in-school youth curriculum development, contact gradrequirements@education.ohio.gov. For USO contacts, see the list at <https://www.ohiohighered.org/workforce/career-services>.

Recognition Procedure

- (A) An organization seeking program recognition shall submit a request to the Council Office via e-mail attachment, addressed to pre-apprenticeship@jfs.ohio.gov:
- (B) The Council Office will assess whether the plan meets the criteria specified in this policy and will either:
 - (1) grant recognition;
 - (2) reserve recognition, pending collaboration with the applicant to remedy any perceived deficits in the program; or
 - (3) deny recognition, unless and until a request is filed that demonstrates sufficient program quality.For programs serving in-school youth, the Council Office may choose to consult with the Ohio Department of Education to evaluate the alignment of curriculum with state standards, prior to granting recognition and in the collaboration that occurs in the "reserve recognition" stage.
- (C) The Council Office shall record every program recognition. The list of recognized programs shall be posted online at <https://apprentice.ohio.gov/pre-apprenticeship/>

(D) Any modification or change to a recognized program shall be promptly submitted to the Council Office and, if approved, shall be acknowledged and recorded as an amendment to such program.

V. Local Workforce Development Area Collaboration

In several Training and Employment Notices (TENs) and Guidance Letters (TEGLs), the US Department of Labor (DOL) provides guidance on the benefits of pre-apprenticeship and how they can be applied to WIOA participants. (See References section for links.)

Pre-apprenticeship programs that meet national standards of best practice - standards reflected in this Policy Letter - qualify for the use of WIOA Individual Training Accounts (ITAs) and the associated supportive service funding. Any ITA dollars left unspent upon an individual's completion, may follow that person into an RA program and be applied toward its technical instruction component. In addition, the DOL TEGL 13-16 recommends using pre-apprenticeship for the 20% of WIOA youth funds required to be spent on work experience. In Ohio, all WIOA youth are served through the CCMEP program. CCMEP combines funds from WIOA and TANF and provides coordinated case management and assistance to eligible participants in both programs who range in age from fourteen through 24.

Other funding and in-kind resources for pre-apprenticeship include, but are not limited to, Perkins Act Career and Technical Education grants and federal programs such as SNAP E&T, HUD E&T (including Section 3 Covered Financial Assistance), Community Services Block Grant, and others cited in the Background section above. See TEGL 13-16, concerning Registered Apprenticeship, for details about training partnerships with these and other programs. The ultimate source of information and contacts for resources in any local area, is the OhioMeansJobs system, which can be accessed through links under "Further Information" below.

Please note that while RA programs automatically qualify for inclusion on the state eligible training provider (ETP) list known in Ohio as the Workforce Inventory of Education and Training (WIET), pre-apprenticeship programs must apply for inclusion and meet all state-defined criteria listed in WIOAPL 16-02.1.

Local Workforce Development Boards (WDBs) are encouraged to make full use of this program model by working closely with high-quality pre-apprenticeship programs in their areas, and where such programs are lacking, to coordinate with RA sponsors in the development of new ones. WDBs are urged to apply the best-practice knowledge found in DOL issuances on the subject and in other resources listed below.

WDBs should have written policies concerning the use of pre-apprenticeship, including related partnerships, coordination, needs assessment, and referral procedures.

Further Information

Further details of interest regarding pre-apprenticeship programs, are available from the following sources:

- Resources for designing and operating a successful pre-apprenticeship program, are linked from the web page at <https://apprentice.ohio.gov/pre-apprenticeship/>.

- Career clusters are defined and listed at these web sites:
 - Clusters, pathways, and BLS: Connecting career information - <https://www.bls.gov/careeroutlook/2015/article/career-clusters.htm>
 - Career Technical Education: Career Clusters - <https://careertech.org/career-clusters/>
- Knowledge, Skills, Ability (KSA) attribute lists are linked from the main ONet page at <https://www.onetonline.org/>, under the sub-header "Browse by ONet Data".
- OhioMeansJobs local area contact information is available through:
 - an interactive map at <https://jfs.ohio.gov/owd/WIOA/map.stm>
 - a list of local area staff at <https://jfs.ohio.gov/owd/WIOA/docs/LocalWorkforceSystem.stm>
- The state contact for questions about WIOA is: WIOAQNA@jfs.ohio.gov
- The state contact for questions about CCMEP is: CCMEPQNA@jfs.ohio.gov
- The state contact for questions about pre-apprenticeship is: Pre-Apprenticeship@jfs.ohio.gov
- Ohio contact information for recognized pre-apprenticeship programs is listed at <https://apprentice.ohio.gov/pre-apprenticeship/> and for RA sponsors at <https://ohiomeansjobs.ohio.gov/wps/portal/gov/omj/job-seekers/practice-your-skills/occupation-search>

VI. REFERENCES

[TRAINING AND EMPLOYMENT NOTICE NO. 13-12](#) - Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources

[TRAINING AND EMPLOYMENT NOTICE NO. 04-15](#) - Expanding Registered Apprenticeships and Pre-Apprenticeships to Create a Pathway to Good Middle Class Jobs for Youth and Adults with Disabilities

[TRAINING AND EMPLOYMENT GUIDANCE LETTER No. 13-16](#) - Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA)

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