



February 21, 2024

**WIOAPL 21-03.1 (State-Recognized Pre-Apprenticeship)
Workforce Innovation and Opportunity Act Policy Letter No. 21-03.1**

TO: Pre-Apprenticeship Providers
Local Workforce Development Board Directors
Fiscal Agents
OhioMeansJobs Center Operators

FROM: Matt Damschroder, Director

SUBJECT: State-Recognized Pre-Apprenticeship

RECISSION: Workforce Innovation and Opportunity Act Policy Letter 21-03

ATTACHMENT: State Recognized Pre-Apprenticeship Glossary

I. Purpose

This policy letter provides the criteria for state recognition of pre-apprenticeship programs which provide the skills and work experience needed to be successful in a Registered Apprenticeship program. This information is meant to promote the establishment of pre-apprenticeship programs, support the local workforce development area's (local area) use of pre-apprenticeship training in Workforce Innovation and Opportunity Act (WIOA) Title I programs, and assist local areas 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 in 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. 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.

This policy letter provides guidelines for applying the pre-apprenticeship model in WIOA Adult and Dislocated Worker programs and Comprehensive Case Management and Employment Program (CCMEP) activities for youth; 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. Requirements for State Recognized Pre-Apprenticeship Programs

Pursuant to 20 CFR 681.480, pre-Apprenticeship is a program designed to prepare individuals to enter and succeed in a registered apprenticeship program and includes the following elements:

- A. Training and curriculum that aligns with the skills needs of employers in the Ohio economy;
- B. Access to educational and career counseling and other supportive services, directly or indirectly;
- C. Hands-on, meaningful learning activities that are connected to education and training activities, including exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- D. Opportunities to attain at least one industry-recognized credential; and
- E. A partnership with one or more registered apprenticeship programs that assist in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship.

Eligibility for Recognition

To be eligible for state recognition, a pre-apprenticeship program must develop and adhere to 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 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, treatment, and training of pre-apprentices [Name of program] 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 program] will take affirmative action to provide equal opportunity in pre-apprenticeship and will operate the pre-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.

(C) Instructional content -- The operating plan shall describe the details of the training, including:

- (1) the apprenticeable occupation(s) or occupational sector(s) for which participants will be trained;
- (2) 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.

(3)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, or, in situations where clearly defined safety issues are recognized, and with the permission of the Council Office, through job-shadowing;

(D) Job readiness skills -- The operating plan shall describe a provision or referral for services that address, where appropriate, deficits in pre-employment and soft skills.

(E) 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.

(F) 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.

(G) Partnership -- The plan, minimally, will include a statement outlining the connection of the pre-apprenticeship instruction to the skill expectations of one or more Ohio RA program(s) in the same occupational sector. The statement should also include the process for informing pre-apprentices of the procedures and assisting the pre-apprentice in entering such program(s) should the pre-apprentice wish to continue with RA. The director of the Ohio Department of Job and Family Services may amend the requirements when funded under a Department of Labor grant.

Information pertaining to Ohio's RA programs can be found at:

Ohio's Registered Apprenticeship sponsors are listed online at https://ohiolmi.com/Home/Dashboards/ApprenticeOhio_Dashboard.

For questions on in-school youth curriculum development, contact gradrequirements@education.ohio.gov.

For USO contacts, see the list at [Ohio's Campuses | The Ohio Department of Higher Education](#).

The pre-apprenticeship program must report the following information to the Council Office regarding pre-apprentices in the program:

- (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.

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; or
 - (2) reserve recognition, pending collaboration with the applicant to remedy any perceived deficits in the program.For programs serving in-school youth, the Council Office may choose to consult with the Ohio Department of Education and Workforce 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. ApprenticeOhio will identify and publicly recognize pre-apprenticeship programs by posting the recognized programs 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.

A state-recognized pre-apprenticeship program must provide accurate information and administer the program according to the approved operating plan. ApprenticeOhio considers a program to have committed a violation when a pre-apprenticeship program intentionally supplied inaccurate information or has substantially violated any portion of this policy. If ApprenticeOhio determines that a program has committed a violation, ApprenticeOhio will revoke program recognition and remove the program from the listing of recognized programs on the website.

V. Collaboration with the Local Workforce Development Area

Pre-Apprenticeship participants may be referred to the relevant OhioMeansJobs center where appropriate access to service may facilitate participation in the pre-apprenticeship program and prepare for registered apprenticeship training, as appropriate. Pre-apprenticeship programs may strategize and share information with the OhioMeansJobs center, to streamline services for participants.

Recognized pre-apprenticeship programs qualify for the use of WIOA-funded individualized training accounts (ITA), work experiences, and associated supportive service funding. For pre-apprenticeship programs to become eligible for WIOA ITA funds, the program must become an eligible training provider by applying on the Workforce Inventory of Education and Training (WIET). Workforce Innovation and Opportunity Act Policy Letter (WIOAPL) 16-02.2 provides the criteria to become an eligible training provider. Any ITA dollars left unspent upon an individual's completion

may follow that person into a registered apprenticeship program if the individual transitions.

Should a participant in the pre-apprenticeship program need services that will support their participation in the program, the OhioMeansJobs center may provide such assistance. Supportive services are available, after an assessment of need, to provide services to alleviate barriers to participating in the program, including but not limited to, childcare, transportation, testing, and work attire. Additionally, the OhioMeansJobs center may make additional referrals to community resources for any additional services, including economic assistance, food banks, and other needs.

Local workforce development boards (WDB) should have written policies concerning the coordination and use of pre-apprenticeship, including related partnerships, needs assessments, and referral procedures. WDBs are encouraged to work closely with pre-apprenticeship programs in their areas, and where such programs are lacking, to coordinate with entities interested in developing new ones.

VI, 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://jfs.ohio.gov/job-services-and-unemployment/job-services/job-programs-and-services/apprentice-ohio/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".
- Interactive OhioMeansJobs center map, which includes staff contact information, is available at [Local Agencies Directory | Job and Family Services \(ohio.gov\)](#)
- 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/>

VI. REFERENCES

20 CFR 681.480.

Title 29 of the CFR, part 30

[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)

Workforce Innovation and Opportunity Act Policy Letter 16-02.2

ATTACHMENT: State Recognized Pre-Apprenticeship Glossary

Term	Definition
Apprentice	A person at least sixteen years of age, except where a higher minimum age standard is otherwise fixed by law, who is participating in a Registered Apprenticeship program to learn a skilled occupation, pursuant to a Registered Apprenticeship agreement.
Apprenticeable occupation	An occupation which: (1) Is customarily learned in a practical way through a structured, systematic program of supervised training on the job; (2) Is clearly identified and commonly recognized or accepted throughout an industry; (3) Requires two thousand or more hours of work experience to learn; (4) Requires related technical instruction to supplement the on-the-job experience training; (5) Involves manual, mechanical, and/or technical skills applicable in like occupations throughout an industry; and (6) Is recognized by the registration entity and/or the US Department of Labor's Office of Apprenticeship as meeting the foregoing five criteria.
Apprenticeship program	A program that is registered by a registration agency and that combines on-the-job training and related technical instruction, according to the specifications established by parts 29 and 30 of 29 CFR, and as further established in Ohio under division 5101:11 of the Administrative Code, such requirements being designed to ensure a high level of program quality and accountability, supported by state and federal administrative oversight. This model of training does not correspond to activities designated as "apprenticeship" in other divisions of the Administrative Code, except where programs are stipulated that are registered pursuant to division 5101:11 of the Administrative Code.
Apprenticeship sponsor or Registered Apprenticeship sponsor	Any organization operating a Registered Apprenticeship program and in whose name the program is registered. A sponsor is characterized as either "individual" (comprising a single employer and/or a union representing its employees) or "group" (including multiple employers and/or a union or association with which they are affiliated), and in both cases as either "joint"

	(assigning program operations to a committee equally representing labor and management) or "non-joint" (not involving such a committee). For the purposes of this policy "apprenticeship sponsor" may also mean a consortium of multiple apprenticeship sponsors organized around an occupational sector or a specific occupation.
Council or OSAC	The Ohio State Apprenticeship Council, created under section 4139.02 of the Revised Code.
Council Office	The unit of the Ohio Department of Job and Family Services (ODJFS) that staffs the Ohio State Apprenticeship Council and performs administrative and oversight functions concerning Ohio's Registered Apprenticeship and pre-apprenticeship programs. [Definition adapted from OAC 5101:11-1-01.]
Job shadowing	The acquisition of relevant knowledge about a job by spending one-on-one time with, and observing the work of, an experienced employee in that job. A job shadowing participant is not employed in the production process but gains knowledge of it through observation.. Job shadowing participants are unpaid.
National apprenticeship system	The combined set of all Registered Apprenticeship programs nationwide, those organizations that provide service to such programs, and the government agencies at various geographic levels that oversee such programs.
Opportunity to attain an industry-recognized credential	A program that provides a chance to earn a credential, certificate, certification, or license which demonstrates knowledge and skill gained by the participant.
Partnership	The connection of the pre-apprenticeship instruction to the skill expectations of one or more Ohio registered apprenticeship program(s) in the same occupational sector, and the process for informing pre-of the procedures and assisting the pre-apprentice in entering such program(s) should the pre-apprentice wish to continue with the RA.
Pre-apprenticeship operating plan	A written plan describing a pre-apprenticeship program in terms of the requirements for state recognition.
Pre-apprenticeship program	A program that teaches basic technical and job-readiness skills for a designated apprenticeable occupation or occupational sector, to prepare participants for Registered Apprenticeship training. The term refers

	<p>particularly to a program that receives recognition under this policy on pre-apprenticeship.</p> <p>Pre-apprenticeship normally features a classroom and/or lab setting, but may also involve work-site visits, job-shadowing, or other activities outside the program facility, to provide exposure to the work environment for the targeted occupation(s). The model for pre-apprenticeship training varies depending on the targeted group recruited for training. Basic categories include:</p> <p>(1) Youth Pre-Apprenticeship – a program which prepares students to enter a Registered Apprenticeship program.</p> <ul style="list-style-type: none"> (a) Students take courses directly related to the apprenticeship field, in addition to their required high school coursework, which count toward high school graduation. (b) Students participate in on-the-job learning activities (beginning at age 16), which may count toward entry into an apprenticeship program. c) Students can apply to a registered apprenticeship program leading up to or upon high school graduation. <p>(2) Adult Pre-Apprenticeship -- A pre-apprenticeship program which primarily serves trainees who are 21 and older. Program designs will differ from those of youth pre-apprenticeship, in that they involve adults' learning styles and their distinct life situations, such as, but not limited to, the challenges of being unemployed and having family responsibilities. Within these parameters, training models will vary by target group.</p> <ul style="list-style-type: none"> (a) Dislocated workers generally have a satisfactory work and training record and often can move relatively fast into a new occupational field with minimal technical preparation. (b) Long-term unemployed workers may lack some of the behavioral skills and/or confidence needed for progress on a career path.
Pre-apprenticeship provider	Any organization or partnership that operates a pre-apprenticeship program recognized by the Council Office as meeting its criteria for safety under the Council's Policy on Pre-Apprenticeship.
Registration agency	An entity authorized by the US Department of Labor's Office of



	<p>Apprenticeship (OA) to administer and enforce on a statewide basis the requirements affecting apprenticeship programs and apprentices, as established by parts 29 and 30 of 29 C.F.R., and as further established in Ohio under division 5101:11 of the Administrative Code. In Ohio, the registration agency is the Ohio Department of Job and Family Services, which exercises this function through its Council Office.</p>
<p>Supportive services</p>	<p>Supportive services are services such as transportation, childcare, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under the WIOA.</p>
<p>Work experience</p>	<p>Work experience is a planned, structured learning experience that takes place in a workplace for a limited period. Work experiences may be paid or unpaid.</p>