

A REVIEW OF REGISTERED APPRENTICESHIP IN RHODE ISLAND

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Table of Contents

Executive Summary	3
Section I: Overview	8
Section II: Stakeholders' Survey	12
A. Approach	12
B. Stakeholders' Assessment of Current Status of Apprenticeship in Rhode Island	14
C. Perceived Strengths of the System	16
D. Changes Needed to Rhode Island's Apprenticeship System	17
1. Structure and Administration	18
2. Recruitment/Marketing	24
3. Training and Related Instruction.....	27
4. Relationships/Partnerships.....	29
5. Performance	32
E. Steps to be Taken to Make Recommended Changes	34
F. Impediments That May Stand in the Way of Change.....	35
G. Anything Else?	37
Section III: Findings	38
Section IV: Recommendations for Consideration	45
Appendix A: Letter from Governor's Workforce Board to Stakeholders.....	56
Appendix B: Stakeholders' Survey Instrument.....	58
Appendix C: Stakeholders' Survey Responses	67
Appendix D: USDOL TEGl No. 2-07	133

Executive Summary

In the winter of 2008, the Governor's Workforce Board Rhode Island (GWB), in partnership with the Rhode Island State Department of Labor and Training (RIDLT), published a Request for Information (RFP) for Professional Services to conduct an assessment of the State's Registered Apprenticeship (RA) program. The RFP indicated that Rhode Island is interested in developing an innovative program that is more expansive, demand driven, and aligned with the workforce system and other key partners such as education and economic development. This goal is evidenced in Rhode Island's State Strategic Workforce Plan for 2009 – 2014 which endeavors to "strategically align resources," including RA, "toward a common goal of increasing the skills and competitiveness of all Rhode Island workers." The GWB views RA as a valuable tool in developing a competitive workforce.

The RA model is a time-tested one that provides the trainee with an income while the trainee develops occupational and other work-related skills in a real work setting. Trainees earn portable credentials and upon completion typically earn good salaries. In many states trainees earn college credits while in training. From the employer's perspective, RA offers a pipeline of well-trained workers who can advance along a career ladder and help stem the problem of employee turnover. While RA has traditionally been viewed as the training model for the building trades industry, the federal Department of Labor has encouraged expanding the model to other industries. Many states have responded by developing RA programs in high growth areas such as healthcare, biotechnology, Pharmacy Technician, maritime trades, and information technology.

The GWB's interest in identifying models to develop a competitive skilled workforce is given new urgency as a result of the recent recession which has deeply affected the state's economy. Rhode Island has been among the states hardest hit by the recession. Since the beginning, Rhode Island has ranked near the top of the list of states with the highest unemployment in the nation. With an unemployment rate that has been hovering around 12.0 percent, Rhode Island's unemployment rate for July 2010 was 11.9 percent which is the fourth highest in the nation behind Nevada, Michigan, and California. The national average for this same period was 9.5 percent. Registered Apprenticeship is seen as a potential tool for providing quality employment opportunities to Rhode Island's residents and well-trained workers for business, thereby helping to grow the economy and keep workers and businesses in the state.

While there is considerable anecdotal evidence of the high earnings associated with completion of a RA program there has been little research to date. An exception is a recent study conducted in Washington State by Kevin Hollenback of the W.E. Upjohn Institute (*Working Paper: State Use of Workforce System Net Impact Estimates and Rates of Return*). In studying costs and earning gains for exiters from RA as well as exiters from other education such as community colleges and Workforce Investment Act (WIA) training, he estimated the social benefits or return on investment for RA to far exceed projected benefits for community college students and WIA trainees. Furthermore, he projected that on a lifetime basis, earnings gains less costs for apprenticeship were more than double the gains of community college attendees.

In its RFP, the GWB requested an environmental scan to assess the program's Strengths, Weaknesses, Opportunities, and Threats (SWOT). This was to include a

review of program performance, policies, practices, procedures, materials, regulations, staffing patterns, management systems, reporting, etc., and interviews with key staff and other stakeholders.

Coffey Consulting, LLC (Coffey) responded to the RFP and was awarded a contract through a competitive bid process and began substantive work on the project during a meeting with GWB and RIDLT professional staff and the State Apprenticeship Council (SAC) in April 2009. A follow-up meeting was held in July 2009. In late fall 2009 and continuing throughout winter, Coffey conducted interviews with 43 individuals selected by GWB that were grouped into five categories: 1) Union (joint) construction, 2) Non-union, Open shop/merit shop construction, 3) Apprenticeship Council members, 4) State professional staff, and 5) "Other stakeholders," which included educators, representatives from chambers of commerce and representatives from various industries and industry-wide associations.

Coffey developed a survey instrument to facilitate conversational interviews that captured information on a wide range of items and issues related to apprenticeship. The instrument was organized around the following five major topic areas: 1) Structure, Administration, and Funding; 2) Recruitment and Marketing; 3) Training and Related Instruction; 4) Relationships and Partnerships; and 5) Performance. Interviewees were asked to provide their assessment of the Rhode Island State Apprenticeship System for each of the items. The items were used as prompts to elicit opinions from the interviewees.

This document reports on the findings from our interviews with stakeholders as well as our review to date of internal policies, practices and procedures. While the

assessment of Rhode Island's Apprenticeship System among stakeholders ran the gamut from "seems fine" to "completely broken," consistent and recurring issues were raised. Among the issues of greatest concern to stakeholders were ratio matters, state staffing, staff responsibilities, regulation oversight and enforcement, and the perceived disparity of quality between union/joint and non-union programs.

The most controversial issue was the ratio of apprentices to journeypersons, with union and non-union stakeholders expressing divergent opinions. The single, most common criticism of the Apprenticeship System in Rhode Island, however, related to the lack of staff, resulting from underfunding, and the effects this has on all aspects of the system. It is the state's responsibility to promote and market apprenticeship, develop new programs, monitor related instruction, maintain standards, provide technical assistance, ensure equal employment opportunity and affirmative action, interpret and enforce the regulations, including ratios, apprentice wage, curriculum, hours, and quality, among other things. The ability to carry out these duties is enhanced when sufficient staffing is in place.

Coffey provides numerous recommendations from our work to date. Most salient is the need for additional staff not only to carry out the vision of the State Management staff, but to also meet the basic federal mandates related to compliance.

Coffey extends thanks to Sandra M. Powell, Director, RIDLT; John J. O'Hare, Acting Executive Director, GWB; Nancy J. Olson, Acting Chief, GWB; Ron D'Ambruoso, Acting Assistant Director, Workforce Regulation and Safety; and Bernard Trembl, Supervisor of the Office of Apprenticeship for their leadership and assistance in ensuring that we had access to appropriate interviewees and resources. They have an

interest in bringing about positive change in the state's apprenticeship system and making it an important part of the solution to today's challenging workforce issues. In particular, we are grateful for the guidance and ongoing assistance of Nancy J. Olson, Acting Chief, GWB, who served as our primary contact and facilitated all planning efforts and communications.

Section I: Overview

During the winter 2008, the Governor's Workforce Board Rhode Island (GWB), in partnership with the Rhode Island State Department of Labor and Training (RIDLT) published a Request for Proposals (RFP) for Professional Services. Prior to the announcement of the RFP, Apprenticeship in Rhode Island had seen the retirement of its long-time Director and an interim Director.

Coffey Consulting, LLC (Coffey), with extensive experience working in apprenticeship on the national and state levels, submitted a bid through Rhode Island's competitive procurement process. Coffey received a letter of intent to contract from GWB in spring 2008 and received an executed contract in November 2008.

The GWD invited Coffey to initiate work under the contract in April 2009. On April 13, the Coffey team traveled to Rhode Island for a one-day visit. The purpose was to meet the key staff from the GWB and the RIDLT and to discuss the approach to the project. The Coffey team had an opportunity to attend a State Apprenticeship Council (SAC) meeting and meet the chairman and several members of the Council.

Coffey's next visit took place on July 27-28. The Coffey team participated in a meeting which included: Sandra M. Powell, Director, RIDLT; John J. O'Hare, Acting Executive Director, GWB; Nancy J. Olson, Acting Chief, GWB, and; Ron D'Ambruoso, Acting Assistant Director, Workforce Regulation and Safety; and other top-level leaders in the Labor Department. The meeting also included Bernard Trembl, Supervisor of the Office of Apprenticeship, who had been newly appointed to the position. In addition to extensive conversations with the state professional staff, interviews were also

conducted with the chairman of the SAC and the Regional and State Directors for the US Department of Labor's (DOL) Office of Apprenticeship.

The Coffey team also attended a meeting of the SAC during which a presentation was made to the Council by the Regional Director on the new regulations. The main topic of discussion with the state team was the best approach to accomplishing the state's objectives and whether the approach outlined in the proposal was still applicable given the time that had elapsed since the issuance of the RFP. The RFP stated that Rhode Island was interested in developing an innovative program that was more expansive, demand driven, and aligned with the workforce system and other key partners such as education and economic development. Coffey proposed conducting an environmental scan that would assess the program's Strengths, Weaknesses, Opportunities, and Threats (SWOT). This was to include a review of program performance, policies, practices, procedures, materials, regulations, staffing patterns, management systems, reporting, etc., and interviews with key staff and stakeholders. Other deliverables included the development of a future vision for apprenticeship and a comprehensive report on findings and recommendations.

One of the items discussed during the meeting with state leadership was the idea of having Coffey organize a special stakeholders' conference for Registered Apprenticeship (RA) that would include representatives from a wide range of industries for which RA might serve as a viable training model. Approaches to this meeting were discussed, and it was decided that the meeting should take place in September.

Coffey maintained contact with the GWB following the site visit. The date for the stakeholders' meeting was pushed back to later in the fall. After further discussion, it

was decided that Coffey would begin by conducting a survey, with the results of this survey informing and shaping the stakeholders' meeting following the completion of the report. Coffey requested and received a list of stakeholders' names and contact information, and work on the survey began in late fall of 2009.

The original RFP called for Coffey to make recommendations to RI to draw upon best practices of other states. Because Coffey had recently completed such a survey for another state, and the information was available to RI, Coffey suggested researching how other states were using American Recovery and Reinvestment Act (ARRA) funds to expand RA. This is something for which interest had been expressed at an earlier meeting. The GWB agreed and this would be accomplished at a later date.

From the start of the project, conference calls were held with the GWB and RIDLT, as appropriate. Beginning in May 2009 and continuing through the present, Coffey submitted monthly reports to document progress. Other ongoing communication took place by email and telephone.

Section II of this report includes a narrative synthesis of the comments made by stakeholders in response to the survey. Section III contains a distillation of findings from the interviews and Section IV presents the analysis and recommendations based on all components of the project to date.

Valuable information is contained in the appendices. They include copies of: the letter sent from the Governor's Workforce Board to the stakeholders describing the project and introducing Coffey (Appendix A); the instrument used for the survey of stakeholders (Appendix B); and a detailed summary of actual responses from the surveys (Appendix C). Importantly, also included is a copy of the DOL Training and

Employment Guidance Letter No. 2-07, which discusses the relationship between apprenticeship and workforce development.

Section II: Stakeholders' Survey

A. Approach

In an effort to develop an understanding of the status of the Rhode Island Apprenticeship system and to identify what appeared to be working, what needed to be changed, and what improvements needed to be made, Coffey engaged in discussions and interviews with key staff and stakeholders. Some of these took place during two site visits while others were conducted by phone.

Coffey requested, and was provided by the GWB, lists with names and contact information of various individuals to be contacted and invited to participate in the survey. At Coffey's suggestion, the GWB sent a letter from then Acting Executive Director, John O'Hare, to the individuals identified to be interviewed (see Appendix A). The intent was to explain the purpose of the calls, encourage their participation, and introduce the Coffey staff who would be calling them. Individuals selected to be invited to participate can be grouped into five categories: 1) Union/joint construction, 2) Non-union, open shop/merit shop construction, 3) State Apprenticeship Council members, 4) State professional staff, and 5) "Other stakeholders," which included educators, representatives from chambers of commerce, and representatives from various industries and industry-wide associations.

Coffey initiated the calls to arrange for a convenient time for an interview. This process took longer than anticipated. Establishing initial engagement usually entailed multiple attempts before contact could be made and interviews could be arranged. This process occurred in the late fall and some delays may be attributable to busy holiday schedules. Coffey continued with the contacts and calls through the initial months of

2010. In general, the people who were most likely to respond were ones who had a direct connection to RA. In an effort to offer an opportunity for others who may not have seen the original letter, to participate, Coffey suggested sending an email to all of the individuals on the list who had not yet responded. This plan was approved by the GWB and the email was sent out in the late winter. This resulted in a number of interviews, primarily with representatives from industry who had an interest in RA but did not know much about it. In total 43 interviews were completed.

To capture information on a wide range of items and issues related to apprenticeship, Coffey developed a survey instrument (Appendix B) to facilitate conversational interviews. Most of these were organized around the following five major topic areas: 1) Structure, Administration, and Funding; 2) Recruitment and Marketing; 3) Training and Related Instruction; 4) Relationships and Partnerships; and 5) Performance. Interviewees were asked to provide their assessment of the Rhode Island State Apprenticeship System for each of the items. The items were used as prompts to elicit opinions from the interviewees. Interviewees responded only to the items they were knowledgeable or held various opinions about.

A succinct summary of the key points communicated by interviewees in each of the five groups is provided in Appendix C. Comments that appear in *italicized* type are ones made repeatedly within the same group. Following is a narrative summary of responses to each of the items. Where there was considerable agreement or disagreement on the items among the groups, it is noted in the text.

B. Stakeholders' Assessment of the Current Status of Apprenticeship in Rhode Island

Respondents were stakeholders from Union/joint construction, Non-union construction, State professional staff, State Apprenticeship Council members, and an additional category which included representatives from education, chambers of commerce, employer associations, and other industries (other than construction).

While the assessment of Rhode Island's Apprenticeship System ran the gamut from "seems fine" to "completely broken," there were consistent and recurring complaints from stakeholders. Among those of greatest concern were ratio matters, state staffing, staff responsibilities, regulation oversight and enforcement, and the perceived disparity of quality between union and non-union programs.

The most controversial issue was the ratio of apprentices to journeypersons. In general, union stakeholders favor having a ratio between 1:3 to 1:5, citing that the higher ratio creates a better learning and safety environment. Non-union stakeholders most frequently favor a 1:1 ratio because they think a higher ratio limits the number of new apprentices that can be hired. State management has necessarily been preoccupied by the ratio issue and expressed interest in being able to resolve it amicably and fairly. Respondents outside the construction industry were not as opinionated because they do not have active apprenticeship programs.

The most common criticism of the Apprenticeship System in Rhode Island relates to the lack of staff caused by underfunding and directly affecting all aspects of the system. It is the state's responsibility to: promote and market apprenticeship; develop new programs; monitor related instruction; maintain standards; provide technical

assistance; ensure equal employment opportunity and affirmative action; interpret and enforce the regulations including ratio, apprentice wage, curriculum, hours, and quality; among other duties. Most stakeholders cited shortcomings in these areas because there is only one person in the apprenticeship division. Included among the suggestions to resolve this issue were recommendations to increase the number of staff needed to accomplish the required tasks. It was even recommended by some that if the state could not provide sufficient staff to meet its regulatory mandates, that the RI Apprenticeship Office should be relinquished to the USDOL, Office of Apprenticeship.

Issues were also raised concerning the makeup and actions of the SAC, its vacancies, role, and relationship to the Apprenticeship Office Supervisor. Respondents in the non-union and “other” sectors expressed concern that the SAC is imbalanced – members are predominantly union construction representatives, and there is no representation from minorities, women’s groups, or industries other than construction. There were also comments questioning the wisdom of not having a change in the chairmanship of the SAC in the last eighteen years.

While being complimentary of the Apprenticeship Office Supervisor, respondents were quick to note that no matter how invested or talented a supervisor might be, it is not possible for one person to do everything needed given the limited time and resources available. Some respondents volunteered that RA should continue to be housed in its current division within Labor because of its relationship with the licensing boards.

There was criticism about who (union vs. non-union) runs better apprenticeship programs, but many expressed the opinion that this could be resolved if the

Apprenticeship Office were given adequate staff to monitor, provide assistance, and to enforce regulations uniformly for all programs.

Respondents overwhelmingly suggested that new technology is needed to improve the availability, timeliness, and quality for reports and information from the Apprenticeship Office.

Respondents in the “other” category expressed an interest in the creation of better linkages between the education system and workforce development as well as new linkages with industries not currently working with apprenticeship.

C. Perceived Strengths of the System

Although the question was intended to identify strengths, some respondents were quick to point out problems, even while discussing strengths.

Respondents to this question noted that Rhode Island had a very strong program and that apprenticeship is an excellent mode of training the workforce. Many responses provided positive feedback on the quality of apprenticeship in Rhode Island, noting that the construction industry (both union and non-union) successfully utilizes apprenticeship to train for their current and future workforce needs. They noted further that apprenticeship training keeps abreast of new technology in the industries and trains using the newest industry standards.

There were positive comments from most sectors on the regularity of the SAC meetings (when there is a quorum) and the very thorough review they make of all applications. Generally, the SAC and the Apprenticeship Office were viewed in a favorable manner (albeit understaffed). Comments were also made that apprenticeship

is cost effective and trains young people for a life-long career, not just a temporary occupation.

Although there was no criticism of the current regulations on Rhode Island apprenticeship, there were comments on the inability to enforce the regulations because of a shortage of staff.

D. Changes Needed to Rhode Island's Apprenticeship System

When asked the general question about changes needed to RI's Apprenticeship System, respondents from all sectors overwhelmingly recommended the addition of staff to better serve the apprenticeship community. Part of the reason is the need for proper monitoring and enforcement of programs and the regulations. All sectors surveyed noted that without sufficient staff, the obligations of the State to monitor and enforce the regulations cannot be met. Throughout the discussion on the question, the ratio issue was prominent in the responses. Comments about the ratios reflected knowledge of apprenticeship and the background of the respondent (union vs. non-union). The union sector and SAC members expressed the desire for a higher ratio than 1:1. The non-union (merit shop), association, and chamber of commerce respondents favored leaving the ratio as it currently exists at 1:1. There were comments from both union and non-union sectors that the SAC needs new appointments, and some respondents suggested that term limits be established. Many respondents saw a clear need for automation and making materials available electronically. More frequent and better communication among the SAC, staff, and the workforce sector was a suggestion by many; they said it would improve the system if all were better informed. One respondent recommended that the state use an electronic

job matching system to better align jobs with individuals, which would increase retention and graduation rates. Vocational Schools and other educators responded that they would like more involvement and that there should be articulation agreements with higher education for apprentices. Participants from all sectors agreed that an annual statewide apprenticeship conference would be helpful to educate the apprenticeship community.

The following subsections of Section D cover responses to (1) structure and administration, (2) recruitment/marketing, (3) training and related instruction, (4) relationships/partnerships, and (5) performance.

1. Structure and Administration

a. Structure

One union representative offered the opinion that the State's apprenticeship system structure "works for us, but there is not enough staff to say that there is even a structure." One union representative expressed the opinion that the SAC should be involved in apprenticeship standards and not the minutia of every program and apprentice. One respondent expressed the opinion that the SAC is archaic.

Opinions offered on the structure of the system reflected the fact that activities that should be carried out by the system (monitoring, etc.) are not being performed because of a lack of staff. A member of the RIDLT management team offered the opinion that the unit is situated in the enforcement arm of the Agency, and the result is that there is no linkage with One-Stops. SAC members expressed support for keeping the unit housed in its current location within DOL – close to industry licensing.

b. Regulations

On the question of regulations and making the RI apprenticeship system more effective, some union, non-union, and SAC respondents wanted uniform investigation, enforcement, clarity of rules, policies and procedures, and consistent interpretation. Representatives from the state professional staff thought that (1) affirmative action regulations were not monitored or enforced, (2) regulations should be revisited and that new federal regulations should help, and (3) some stakeholders have stated that the regulations are too restrictive and should be updated to make them consistent with the new federal regulations. One union representative, however, stated that RI's apprenticeship regulations need to be re-written and enforced with penalties, fines and sanctions for non-compliance.

Representatives from the SAC acknowledged that the ratio issue is disruptive and must be settled. The ratio issue was most apparent between the union and non-union respondents with a few of the union representatives clearly expressing the view that the 1:1 ratio should not exist because it compromises the safety of apprentices. One union respondent indicated that when a sponsor "puts on too many apprentices," the apprentices usually do not learn as much as they could and they do not get retained. A couple of the non-union respondents thought that the 1:1 ratio was fair and that the 1:5 being advocated by the SAC was wrong.

One respondent from the SAC wanted it to remain regulatory, because becoming advisory would weaken controls. A representative from the state professional staff expressed the view that even though the SAC was regulatory, they generally do not

take action. One union representative wanted a more user-friendly way to track hours and hold sponsors accountable.

c. Staffing Patterns

This question evoked a universal response from all constituencies. More staff is essential. Too much of the work is left undone. A member of the SAC stated that there should be staff to monitor performance in the field and classroom and to maintain office functions. One respondent suggested that there should be a Director of Apprenticeship, 2 to 3 field staff and 1-1/2 to 2 clerical positions. In addition to increasing the number of staff, there was a recommendation that staff receive training in all aspects of their required roles.

d. Communication

Responses to the question varied widely. While many of the respondents offered the opinion that communication was lacking (because of a lack of staff) others stated that it was good. One union representative stated “for what little there is, it is good, but with so few staff, how much can there be?” A member of the SAC and a union representative both observed that it is important for the DOL Director to play a key role in promoting apprenticeship and noted that the current Director is playing such a role. One respondent stated that their communication with the SAC is not good and updates from the SAC and DOL are lacking. A SAC member cited the non-availability of reports which are needed from the unit. He further stated that increased funding, more staff, and improved information technology would resolve any issues related to communication.

e. Management and Oversight

Respondents expressed the need for greater management and oversight but attributed the lack to the fact that staff is too busy handling day-to-day matters.

f. Training

Respondents cited training as an area that suffers. It was noted that there is a learning curve for new employees and there has been staff turnover. All constituencies recommend that staff be trained to perform their duties and that staff should, in turn, train program sponsors. Suggestions were made to conduct regional forums for sponsors and an annual statewide apprenticeship conference.

g. State Monitoring

There was consensus that the Apprenticeship Office has been unable to monitor programs. Respondents were in agreement that monitoring should be carried out on a routine basis and consistently conducted for both OJT and related instruction. Also, there was consensus that upgraded electronic technology was needed to assist in the monitoring effort and provision of regular reports to the SAC.

h. Registration Process

A small number of respondents reported that the registration process was fine as is. Some of the union representatives commented that registration was not a problem, that it went smoothly, and that the process was adequate. A couple of the non-union respondents stated that the process was effortless and had been fair. One person from the SAC concurred that the process was adequate.

The vast majority of the observations were either suggestions for improvements or direct criticisms of the current process. For example, more than one of the union

respondents expressed the opinion that the process needed to be thorough, consistent and held to a high standard. Multiple non-union respondents thought that the registration process should be fairer, quicker and less difficult. One non-union person remarked that non-union companies often have their registration tabled for different reasons such as using the wrong form or not providing enough information. The suggestion was to have more staff who could educate the sponsors about the registration process. Respondents from the state professional staff suggested moving to an electronic system that would be faster and more reliable. The staff also expressed the need for instructions on which forms were appropriate and instructions on how the forms should be completed.

One SAC member thought that photo IDs should be used to ensure that workers on the job were actually registered. Multiple SAC members expressed the need for more staff to perform monitoring duties and to ensure that performance by programs is consistent with what the program sponsors originally submitted to the SAC. Other stakeholders expressed different concerns such as: the process is very restrictive, needs more consistency, and needs to be fairer. More than one respondent thought that the SAC gets involved in too much minutia and that the Apprenticeship Office should do more of the work.

i. Policies, Practices, & Procedures

Opinions offered in response to the question on policies, practices and procedures varied considerably, even among respondents from the same sector. For example, two members of the SAC indicated satisfaction with the status quo while others said there is a need to develop new polices, practices and procedures, and to

rewrite others. Several respondents noted the need for consistency and suggested a review of current policies, practices, and procedures with revisions where needed to ensure that they are clear and easily understood. State representatives indicated that they thought the procedures could be streamlined and the process should be automated. Union representatives offered the opinion that enforcement should be strict and the SAC should defer some of the policies, practices and procedures to be written and enforced by the Apprenticeship Unit.

j. Materials and Forms (Electronic Processing)

There was general agreement across the board that electronic processing of forms, particularly for registration, would make the Apprenticeship Office more efficient and make it easier for sponsors and apprentices. Such processing would also facilitate the storage of records by both the state and sponsors. Online access to forms, practices, and procedures was seen as highly desirable.

k. Reports

Support was expressed for providing electronic access to reports and allowing electronic submission in an effort to speed up the process. A recommendation was made that reports should be streamlined and condensed.

l. Funding

There was consensus across all respondent categories that more funding is needed, primarily for staff and investigators, and for marketing and training. One union representative suggested an alternative solution to more funding would be a partnership across stakeholders that could supply staff to monitor and enforce the regulations. A SAC member suggested that fines should be instituted for non-compliance, etc., and the

funds should be retained by the Apprenticeship Unit instead of being deposited in the general fund. One stakeholder offered the opinion that a portion of the surcharge which employers pay to subsidize the GWB should be used to pay for staff in the Apprenticeship Office.

m. Other

Respondents from the non-union sector expressed the opinion that there should be fair treatment of all participants (program sponsors) in the program, implying that non-union programs do not always receive the same treatment as union programs. Respondents outside of the construction industry suggested that the state should “get the word out” about the value of RA.

2. Recruitment/Marketing

a. Outreach

Respondents to this question addressed outreach in two ways: outreach to new industries outside of construction and outreach to minorities and women in apprenticeship.

The overall consensus was that apprenticeship is not well known outside the construction industry. Respondents noted that it has been tried in other industries and has been successful but that success does not seem to sustain the trials of time. Some industries have traditionally used other training methods (college, vocational schools, OJT, etc.) but not RA, and because the general feeling is that RA is for “unions” and/or “just for construction,” other industries do not know where to start. Respondents recommended that a solid marketing campaign take place which targets other industries, showing what apprenticeship is and how it works. Other respondents said

that the RI apprenticeship system should be fixed before any expansion is attempted. Numerous respondents from other industries said that they would have an interest in learning more about RA, especially if there were funds involved. Several respondents said that RA should be an overall component of the workforce development system to reach out to new industries.

Both union and non-union respondents reported that they reach out to minorities and women for apprenticeship participation. They noted that minority participation has improved over the years but participation by women is low primarily because they tend to not apply for construction occupations. Respondents said that they use various resources to attract different groups such as guidance counselors, job fairs, community-based organizations, news media and career centers as well as pre-apprenticeship, school-to-work, and other programs like *Building Futures*.

b. Pre-Apprenticeship

Some union respondents said that they utilize pre-apprenticeship, while others said that they do not do much with it. Open shop sponsors said that they thought that pre-apprenticeship was an “awesome idea,” but it is not available to all and should be funded, possibly using Workforce Investment Board (WIB) funds. Respondents said that pre-apprenticeship gives a basic education of what the trades are like and helps sort out potential interests, while others noted that pre-apprenticeship does not guarantee placement but does help orient the apprentices. Some surveyed suggested that credit should be given to the apprentices for the time spent in pre-apprenticeship or vocational schools. Those in education said that the SAC should grant credit for classes

previously taken that would otherwise have to be repeated as part of the apprentice's related-instruction classes.

c. School-to-Work

School-to-Work was not mentioned by respondents as a method of bringing in new apprentices. While most respondents thought that School-to-Work is a good concept, they did not know the particulars and noted that there is no present link between apprenticeship and the vocational schools or high schools. Some respondents raised concerns regarding possible problems with insurance, labor laws, and liability because of age requirements. Many said that the SAC should at least explore the use of School-to-Work in RA.

d. Women & Minorities

While the union and non-union participants were quick to question each other's failures to attract minorities and women into apprenticeship, there was recognition that the RI apprenticeship staff has not been able to fulfill its obligation to monitor all RA programs for compliance with the regulations. Respondents agreed that apprenticeship should be open to all but that no one method has proven successful in attracting women and minorities, and no figures are available to assess compliance. Some respondents said there should be better linkages among education, community-based organizations, and RA to increase opportunity for a diverse population.

e. Non-Traditional Apprenticeship Occupations

Overwhelmingly, respondents said that there can be no marketing or recruitment of non-traditional apprenticeship occupations unless there is an increase in staff by the department to market, develop, and monitor new programs. Some respondents said

that in order to attract new occupations or industries, the regulations need to be changed. One respondent noted that there is not much interest by other industries in developing RA, while others said that the untapped industries do not understand apprenticeship and its benefits, so it is not a consideration to them. Other respondents outside construction asked if there were any funds available for starting a new program.

Some respondents noted that there have been attempts by the nursing, child care, plastics, and veterinary industries, but because of lack of staff, marketing, support and interest, they did not get off to a good start, and the initiatives were not sustained. A few representatives suggested that an effort be made to educate the public of the viability of apprenticeship as a way of learning in a variety of trades and occupations outside of construction. Others suggested that the system should be more flexible and more responsive to other industries.

3. Training and Related Instruction

Under new leadership, the RI Apprenticeship Office has begun monitoring related instruction programs. Some stakeholders identified the need to assess the quality of related instruction and therefore will welcome this development.

a. Competency-based Training

The general consensus among respondents who serve on the SAC is that related instruction training should be a combination of “time” (hours spent in the classroom or those hours for which credit is granted) and competency based. Individuals who represented union construction trades expressed the opinion that competency-based training could be acceptable in some cases but should not be the norm. Respondents also indicated that a time-based system that allows for credit

based on education, other work experience, etc., works well. Non-union interviewees from the construction trades expressed the opinion that competency-based training is fair and equitable. Stakeholders expressed a wide range of opinions on this topic. Some are knowledgeable on the subject based on their employment and/or background. They noted that this approach must be monitored by the sponsor, include effective delivery techniques, and include a testing component. One of the individuals interviewed stressed that there should be a blending which would require a minimum amount of time (“one year in the seat first”) followed by a competency-based assessment. One respondent commented that competency-based training is a more efficient way to learn and could lead to a national certification in the trade.

b. National Skills Industry Standards

Stakeholders expressed similar opinions relative to national standards. Union programs receive standards from their International Union while many non-union programs are provided standards by national groups such as Associated Builders and Contractors (ABC). Non-union interviewees made the point that standards are particularly important because they allow for interstate employment mobility. Stakeholders agreed that it is important to have national standards to ensure a specific level of skills.

c. E-learning/Distance Learning

Respondents from all categories appear to be split on the value of e-Learning and Distance Learning. On the positive side, a mix of respondents across all categories indicated that e-Learning/Distance Learning is acceptable as long as there is accountability and appropriate assistance and support, as well as testing, monitoring,

and mentoring. Other individuals mentioned that e-Learning and Distance Learning are okay for specialized activities such as supplemental education (i.e., algebra), some unique aspects of training, and make up missed lessons. One stakeholder noted that since universities and colleges use this tool, it probably has value for apprenticeship.

There were also negative reactions across all of the respondent categories. Comments from union members about e-Learning and Distance Learning included a concern that it was too easy to cheat, it is impersonal, certain trades cannot be learned on a computer, hands-on and one-on-one relationships should not be sacrificed, and strong oversight is needed to prevent abuse. One union respondent commented that RI is so small that there was no need for distance learning. Non-union members also commented on not sacrificing hands-on and one-on-one relationships, and that cheating might be too easy. The concerns about cheating also come from one SAC respondent. One stakeholder was concerned about checks and balances and having a verification of who is actually doing the work.

4. Relationships/Partnerships

a. Relationship with Workforce Development

Both union and non-union representatives along with members of the SAC and stakeholders are of the opinion that RA has little, if any, relationship with the workforce investment system, and there are no partnerships at present. Members of the SAC interviewed expressed the opinion that WIBs should invest in apprenticeship and the Workforce Investment Act (WIA) should be rewritten to incorporate RA. One member of the SAC stated that RI's 5-year Workforce Plan includes apprenticeship and those components should be implemented. Another stakeholder suggested that both systems

could learn and benefit from each other. He further stated that it is something that needs to happen in today's economy, and there is a need to explore ways to work toward a common goal. Union representatives stated that apprenticeship is not in the workforce investment system's focus, and they are not interested in it as a result. One union representative is a member of the WIB and promotes the construction industry. A non-union representative stated that WIBs are more involved in their internal matters and cannot be "bothered" with apprenticeship. Other non-union representatives suggested that there should be a strong relationship so that funds can be provided to support apprenticeship in a manner similar to the way the workforce system supports other programs.

b. Relationship with Education System

Observations about relationships and partnerships with the education system were mostly positive about future opportunities from respondents from the SAC, other stakeholders, the state professional staff, and one non-union person. One respondent from the SAC commented that there were "pockets of (educational) excellence" in RI that could be expanded upon to the benefit of the apprenticeship system. Other stakeholder respondents suggested that the education system should be involved for the training portion of apprenticeship, along with the vocational education community and students because there would be a strong advantage to students; they could enter apprenticeship with a year or more of credit for experience. One state professional staff person thought it would be good to identify opportunities in the education system that would meet apprenticeship needs. The non-union representative thought that the educational system should be involved to ensure proper instruction of needed courses.

Union and non-union respondents indicated that contact with the education system was quite mixed. On the positive side, union respondents made comments indicating that they have significant relationships with vocational and high schools and they help approve vocational curriculum. Further, one individual tries to expose the trade to guidance counselors and students. One non-union respondent indicated that their representatives served on several committees that bring vocational education and apprenticeship together.

On the negative side, there were comments from other union respondents indicating that (1) education seemed to fight the apprenticeship system, (2) there was no contact or dealings with education, and (3) unions do a very good job of training their own. One union respondent indicated that they had no knowledge of the education system in apprenticeship. One respondent expressed the opinion that trades other than his may use vocational schools and colleges, but there was no verification that what is taught/learned is based on the same criteria as what is approved in the apprenticeship structure.

c. Relationship with Economic Development

Respondents indicated that even more lacking than the relationship with education is the relationship with economic development. A union representative offered the opinion that economic development professionals are not interested in apprenticeship. One stakeholder said that apprenticeship *is* economic development and the chambers of commerce should embrace it. A union representative offered the positive suggestion that there are clusters of working relationships that should be identified and expanded.

5. Performance

a. Retention

Interviewees shared the view that the measurement of retention rates is important and that the State needs to be able to produce retention reports. It appears that information regarding retention is anecdotal, and there is little in the way of hard numbers to support various claims. For example, a union representative stated that the retention rate was very good for union-sponsored programs but was lower for non-union sponsored programs. Another union representative agreed that it was lower for non-union programs, but he did not believe the union's rate was 80% as touted by some union sponsors; he suggested that it was closer to 50%. A non-union interviewee expressed the opinion that ABC members have a retention rate of 75% or better.

One union representative recommended that the retention rate goal should be 90%. Another suggested that the state should set standards, for example, requiring a 50% retention rate. This would need to be monitored and sanctions put in place for programs that do not achieve the benchmark.

A non-construction industry stakeholder suggested that it would be a strong selling point in marketing apprenticeship if the state provided documentation of a good retention rate. He also added that the retention rates for apprenticeship should be compared to retention rates for colleges to see how they stack up.

A couple of respondents suggested that if the state were to develop and monitor retention rates, there should be an allowance for early withdrawals from programs for apprentices who decide that they are in the wrong occupation.

b. Graduation

Responses to the question regarding graduation rates mirrored those provided in response to the question about retention rates. Respondents noted that graduation data need to be tracked and reported by the State. Once again, there was some speculation regarding whether union programs have better graduation rates than non-union programs.

Respondents expressed support for the establishment of minimum standards. One union representative offered the opinion that the rate should be set at 90% and sanctions should be established and implemented for poor graduation rates. A member of the SAC suggested that a minimum rate of 75% should be adopted.

One respondent suggested that the state may want to consider issuing interim certificates to participants who do not complete. This would provide the non-completers with some credentials that may be of value in their job search.

c. Quality of Training

The responses to the quality of training question brought a fairly positive response mixed with some subjective criticism of some non-union programs. In terms of suggestions, one union and one SAC respondent expressed the need for tracking and for reports to help with training quality. Another SAC member observed that all programs should be held to the same standard but that they need to be monitored, which requires more staff. Similarly, one stakeholder thought every program should be rated on the quality of their program.

On the general quality issue, one stakeholder stated that most programs are of the highest quality and that they keep the skills of their apprentices high because “in this

business, knowledge and skill is money.” The non-union respondents were uniformly positive. Responses included: “A program needs to be a quality program to even exist;” “It wouldn’t last long if it wasn’t of high quality;” “They wouldn’t use apprenticeship if it didn’t result in a quality worker;” and “Good quality is important when safety is an issue.” One person expressed the viewpoint that it is important to keep the politics of union versus non-union out of the discussion.

One union representative responded that the quality of training in his program was better than it has ever been. Another indicated that their program quality was beyond reproach and can be compared with any program. He added that the same could not be said for non-union programs. Other critical observations: one union respondent thought that non-union programs do not teach as well as union programs, as indicated by some of the trainees that leave to come to union programs, and they are far behind; another union respondent said this was an unfair question because the union versus non-union topic is an argument about quality and who pays for the training. One respondent did suggest that the union training program can always use improvement.

E. Steps to be Taken to Make Recommended Changes

Respondents from each sector overwhelmingly suggested that there should be more awareness of RA by the Governor’s Office, noting that apprenticeship should not be political but should be looked at as a career training system. Support from the Governor’s office in terms of awareness, funding, and staffing were mentioned. Many thought that appointments to the SAC (for current vacancies), more staff including a

permanent Supervisor of Apprenticeship, and funding for apprenticeship marketing and expansion into new industries other than construction were needed.

Diversity of backgrounds and ethnicity of the members of the SAC was recommended. Also expressed was the need for improved communication with the workforce system, staff, and the SAC. Some respondents encouraged a rewrite of the apprenticeship regulations and better monitoring and enforcement of the regulations, with fines and penalties introduced where necessary to achieve the goals of RA. Better reporting and communicating of reports were discussed by all sectors of respondents. The ratio issue was also a priority to all respondents, with unions and open shops having their own recommendations.

Retention and graduation rates were addressed in terms of program quality, and many asked that the state develop guidelines for acceptable levels. An interest was expressed for statewide meetings that would offer training and networking opportunities for sponsors and other stakeholders in the apprenticeship community. Non-union, union, and educators suggested that articulation agreements, college credits, distance learning, and linkages with high schools would all be beneficial enhancements to RA.

F. Impediments That May Stand in the Way of Change

Among all respondents, the lack of staff was the most common impediment/constraint identified to making changes in the system. They link many of the problems in the system to the inability to perform needed services to the apprenticeship community because there are no staff persons to initiate, develop, or follow through on any initiative to expand, monitor, enforce or maintain a solid apprenticeship system in RI. Funds and resources also were considered a hindrance to

fully develop any changes. Staffing, funds and resources were often mentioned in the same response because of their interdependence in identifying solutions. Both union and non-union respondents expressed the opinion that there should be more monitoring and enforcement of the existing regulations.

Union, non-union and other stakeholders brought up the term “politics.” When asked what they meant, the response was both state politics and the union vs. non-union politics. Many non-union respondents expressed the opinion that the SAC was leaning towards the union side and should have better representation from non-union programs, other industries and education. Many in the “other” stakeholder category said that there is a perception that apprenticeship is only for the building trades and that should be changed by promoting and marketing apprenticeship into other industries. Educators said that the SAC has control over the curricula for apprenticeship and that the education community has a desire to be involved in the delivery of related training.

The subject of enforcement of the regulations including the ratio issue, quality of training, wages, and technical assistance were issues that respondents from all sectors said needed to be addressed, and they attributed this to the degree of commitment by the state. They noted that because of the economy and the current employment situation, apprenticeship is not a priority and this is an impediment to expansion of the system.

Several mentioned the need for a stronger linkage and more cooperation between the workforce system/Governor’s Workforce Board and the apprenticeship system and noted that the linkage is making progress as evidenced by this project.

G. Anything Else?

At the conclusion of the interview, respondents were asked if there were any other comments they would like to make that had not been covered. Most respondents used this opportunity to reiterate their responses to the issues about which they felt most strongly. Staffing, funding, politics, ratio, and enforcement of regulations were among those items most frequently mentioned. Many from every sector asked if this report would be made available to the public, and we responded that it was our understanding that the GWB was planning to release it following an internal review.

The non-union sector noted that there is frustration with the SAC being bogged down in minutia and that they are trying to micromanage the system when much of this work could be done by the staff rather than the SAC. Some non-union respondents suggested that the SAC be made an advisory council rather than the regulatory council it is now; union participants prefer the regulatory council.

It was also mentioned by some non-union stakeholders and associations that the State should consider relinquishing control of apprenticeship to the USDOL.

There was strong support for having a forum, roundtable, or stakeholders meeting where many issues could be discussed. This suggestion came from individuals ranging from those with no knowledge of apprenticeship (because there is an interest to learn about it) to those who already have a wealth of apprenticeship experience. Some suggested holding an annual statewide apprenticeship meeting/conference for all interested in apprenticeship.

Section III: Findings

Findings from Survey of Stakeholders

Following are succinct, summary findings based solely on comments made by respondents during the interview, reflecting the range of opinions expressed by participants in the interviews.

1. Stakeholders' Assessment of the Current Status of Apprenticeship in Rhode Island

Many of the issues identified were mentioned consistently and recurrently by respondents across the stakeholder groups.

- The two most frequently identified issues were the debate over ratios of journeypersons to apprentices and the lack of staff to carry out basic oversight and enforcement of regulations.
- There are clear differences of opinion between the union and non-union stakeholders with regard to where the ratio should be set, with the unions wanting more journeypersons to apprentices and the non-union programs favoring ratios as low as 1:1. The struggle over the ratio issue has consumed a lot of time and stands as a major obstacle to moving forward.
- Understaffing affects all aspects of the system such as monitoring related-instruction, maintaining standards, promoting apprenticeship, developing new programs, providing technical assistance, ensuring equal employment opportunity, and enforcing regulations, etc.
- There is the perception by some respondents that there is a disparity between the quality of union and non-union programs. Evidence is anecdotal.
- Respondents suggested that new technology is needed to improve the availability, timeliness, and quality of reports and other information.
- Linkages between RA and the education system, economic development, and non-construction related industries are either non-existent or need strengthening.

2. Perceived Strengths of the System

- There was considerable agreement that RA is an excellent, cost-effective training model, and there was agreement that RI does a good job training for construction-related industries.

- The regularity with which the SAC meets was noted as a strength; however, there were concerns about its ability to have a quorum, given unfilled vacancies.

3. Changes Needed to Rhode Island's Apprenticeship System

- The overwhelmingly response to this question was that additional staff are needed even to carry out the basic functions of monitoring and enforcement, much less expansion.
- The ratio issue needs resolution.
- There is a need to automate forms and reports.
- Improved communication is needed.
- Articulation agreements should be developed with higher education for apprentices.
- Support exists for an annual statewide apprenticeship conference to help educate the apprenticeship community.

4. Structure and Administration

Structure

- The SAC should review its focus. There is a choice to be made between focusing on standards vs. the minutia of every program and apprenticeship.
- There is support for keeping RA within its current organizational structure, close to industry licensing.

Regulations

- There is support for: uniform investigation; enforcement; clarity of rules, policies, and procedures; and consistent interpretation.
- Penalties, fines, and sanctions may be needed for non-compliance.
- Affirmative Action regulations need to be better monitored and enforced.
- Regulations should be updated to reflect new federal regulations.
- The ratio issue is disruptive and must be settled.
- The SAC is a regulatory one but may not be taking action that it is empowered to take. Explore SAC status as "advisory" rather than "regulatory."

Staffing

- Too much work is going undone.
- Several more professional positions need to be added in addition to administrative support.
- Once staff are on board, training needs to take place on all aspects of their jobs.

Communication

- Responses varied with some stating that communication is good and others saying that it is lacking.
- Increased staffing and improved information technology should resolve any issues related to communication.

Management and Oversight

- More staff are needed for improvement to take place in this area.

Training

- Training is lacking due to understaffing.
- There has been turnover in the RA staff and there is a learning curve.
- Program sponsors need training.
- There is support for regional forums and a statewide annual conference.

State Monitoring

- Monitoring is not occurring.
- Monitoring needs to be done on a routine and consistent basis for both OJT and related-instruction.
- Upgraded electronic technology would assist in receiving regular reports.

Registration Process

- The registration process is seen as working; however, multiple non-union respondents noted that the process should be fairer, quicker, and easier.
- One suggestion was to have more staff who can educate the sponsors in the registration process.
- Move to an electronic online system so it would be faster and more reliable.

Policies, Practices & Procedures

- Opinions varied considerably with some satisfied with the status quo while others think there is a need for change.
- Support was voiced for reviewing current policies, practices, and procedures to assess the need for new ones, streamline old ones, etc.

Materials and Forms (Electronic Processing)

- There is general agreement that electronic processing should be adopted, particularly for registration. Also, electronic processing is desired to facilitate the storage of records and to allow for online access.

Reports

- Support exists for electronic access and submission of reports as well as for streamlining and condensing them.

Funding

- There is consensus that more funding is needed.
- One suggestion is that fines should be instituted for non-compliance and that funds be retained by Apprenticeship.
- Another suggestion is that a portion of the surcharge that employers pay to subsidize the GWB should be used to pay for staff in the Apprenticeship Office.

Other

- There is a sense among non-union stakeholders that unions receive preferential treatment.

5. Recruitment /Marketing

Outreach

- Respondents shared the opinion that RA is not well known outside the construction industry.
- One suggestion is a marketing campaign targeting other (non-construction) industries. A caveat is that the current system needs to be fixed first, before expanding.
- Respondents from non-construction related industries expressed interest in learning more about apprenticeship.
- A suggestion is that RA should be an overall component of the workforce development system to reach out to new industries.
- Participation in RA by women has been low, but it is thought to be related to lack of interest by women in construction related occupations.

Pre-Apprenticeship

- Pre-apprenticeship is not widely utilized: one suggestion is that WIBs use funds to create pre-apprenticeship opportunities.
- Another suggestion was that apprentices receive credit for time spent in pre-apprenticeship or vocational schools.

Women & Minorities

- Respondents recognize that RA staff has not been able to monitor programs for compliance in this area.
- No one method has proven effective in recruiting women and minorities.
- Better linkages are needed with education and other organizations to increase diversity.

Non-Traditional Apprenticeship Occupations

- There is general understanding that recruitment and development of non-traditional apprenticeship cannot take place without additional staff.
- Other (non-construction) industries do not know much about RA and need to be educated about its benefits and how it works.

6. Training-Related Instruction

Competency-Based Training

- Respondents favored a combination of time spent in the classroom with some competency-based assessment.
- There were a variety of opinions with some agreeing that this approach makes sense and others cautioning the need for effective delivery techniques and a testing component.
- One suggestion was to require a minimum amount of time followed by a competency-based assessment.

National Skills Industry Standards

- There is support for adherence to national skills standards.

E-Learning/Distance Learning

- Respondents held mixed opinions on the value of e-Learning and Distance Learning.

- In general, there was support as long as there is appropriate assistance, monitoring, and testing.
- One concern is that the ability for a person to cheat has to be minimized or eliminated.
- In general, this mode of learning is not seen as a substitute for hands-on experience and one-on-one relationships.

7. Relationships/Partnerships

Relationship with Workforce Development

- Most respondents think there is little, if any, relationship between the workforce development system and RA.
- Stakeholders favored developing a relationship with workforce and suggested that RA could benefit by receiving WIB funding.

Relationship with Education System

- Most respondents opined that while there are “pockets of excellence” in relationships between education and RA, more work needs to be done.

Relationship with Economic Development

- Most respondents stated that this is an area in which very few partnerships exist but for which there is potential.

8. Performance

Retention

- There was consensus that retention rates are important and that the State needs to be able to produce retention rate reports.
- There is support for establishing retention standards.

Graduation

- Respondents expressed the need for graduation rates to be tracked and reported by the State; they indicated support for the establishment of minimum standards.
- One suggestion was to issue interim certificates to non-completers.
- Regarding retention and graduation rates, there was some speculation as to whether union programs outperform non-union programs.

Quality of Training

- Respondents suggested the need for better tracking and reports and the need to hold all programs to the same standard.
- There was speculation as to whether union programs offered higher quality training than non-union programs.

9. Steps to be Taken to Make Recommended Changes

- More awareness of RA by the Governor's Office.
- SAC vacancies need to be filled.
- More diversity (minorities and women) is needed on the SAC.
- RA should not be political; it is a career training system.
- Funding and additional staffing are critical.
- Develop and implement a system to automate processes, forms, reports, etc.
- Settle the ratio issue.
- Market and expand RA into other industries.
- Improve communication and linkages with the workforce system.
- Rewrite Apprenticeship Regulations.
- Improve monitoring and enforcement.
- Develop guidelines and institute measures for retention and graduation.
- Sponsor statewide apprenticeship meetings or an annual conference for training and networking.
- Articulation agreements for college credit, distance learning, and better linkages with high schools would be enhancements.

10. Impediments That May Stand in the Way of Change

- Lack of staff is the most commonly cited impediment. This is directly tied to the need for more funding.
- State politics and union vs. non-union politics could stand in the way.
- Perception that RA is only for the construction industry.
- Lack of monitoring and enforcement of existing regulations.
- There is a greater need for partnerships.
- Council should not micromanage or be bogged down in minutia, doing work that could be performed by staff.

Section IV: Recommendations for Consideration

The following recommendations are based on information developed from the interviews and our review to date of program policies, practices, and procedures of the Rhode Island Apprenticeship Office.

1) Funding and Staffing

Recommendation: Explore possible increased funding options to provide additional staffing support for the Apprenticeship Office. Hire two full-time professional positions and provide full-time administrative support.

The leaders of the GWB and RIDLT have a vision for RA becoming a more effective and innovative strategy, aligned with the workforce system, for contributing to the economic vitality of RI. The Apprenticeship Supervisor and SAC members are very knowledgeable about apprenticeship and believe strongly in the efficacy of the RA model. There is also a good sense among those involved as to some of the things that need to change in order to make the apprenticeship system more effective. A major obstacle exists, however, between the reality of the present status of the apprenticeship system and the vision for what RA can become. The impediment to moving forward is that the RI Apprenticeship Office is inadequately staffed, due to lack of funding, to meet even its current basic obligations, much less to take on challenges related to such activities as expansion into other industries. The Office currently functions with one full-time supervisor with part-time administrative support to serve more than 700 program sponsors and 1,400 apprentices. The supervisor is assisted in accomplishing numerous tasks by a DOL Regional employee. This individual is approaching retirement age and in recent years, the DOL has not been replacing regional field staff

upon retirement. Therefore, this assistance cannot be counted on in the future. Even with the assistance of the federal staff position, we estimate that the Apprenticeship Office needs two additional full-time professional positions and that administrative support should be available on a full-time basis.

At present, despite the best of intentions, regulatory and enforcement functions such as the monitoring of related-instruction are insufficient. Furthermore, staff does not have the capacity to provide technical assistance or assist in monitoring compliance with the new RI law requiring apprenticeship programs for public works contracts over one million dollars (Title 37, Chapter 37-13, Section 37-13-3.1) to comply with the law. The ability to carry out all other functions such as enforcing regulations, maintaining standards, providing technical assistance, producing accurate reports, ensuring equal opportunity compliance, promoting apprenticeship, developing new programs, and expanding apprenticeship to new industries outside of construction, are all contingent on having adequate staffing.

There are numerous avenues to consider for securing additional funding. One suggestion is to seek approval to have Apprenticeship fees go directly back to the program to help underwrite staffing. Other avenues include possible support from ARRA and/or WIA funds. Another is that a cost-benefit analysis showing the tax revenue generated by apprenticeship completers can be conducted and presented to the legislature to request more funding.

Until the issue of funding and staffing is addressed, it is unreasonable to expect that many of the recommendations made in this report can be fully and/or successfully implemented.

Following are some examples of what several states have recently done to support RA with ARRA and WIA funds:

- In 2009, *Michigan* announced that they would devote \$1 million of their ARRA funds to the creation of the Michigan Registered Apprenticeship Pilot (MRAP) program in order to provide incentives to employers who partner with their local Michigan Works! agencies to sponsor 1,000 new registered apprentices. The MRAP program began in August 2009, and employers are able to use the funding to offset some of the wages or the “technical related instruction” they provide to apprentices. In June 2010 Michigan increased support for specific apprenticeship programs from \$1,000 to \$5,000. The employer incentive doubled from \$1,000 to \$2,000 with the \$3,000 balance to be spent for related instruction.
- *Kansas* is using ARRA dollars to expand its *RA Scholarships* program which provides up to \$1,250 per year per apprentice toward the cost of related technical instruction for the first two years of training in six critical industries. Based upon the recommendations of participants at the Kansas Action Clinic, eligibility requirements for the program have been broadened to include all WIA-eligible adults. The ARRA money is also being used to expand *RA Works!* grant opportunities into all Local Areas in the state. *RA Works!* promotes entry-level certificates in Advanced Manufacturing and Energy and articulates into RA opportunities for dislocated workers.
- In 2009, the *Texas* Workforce Commission approved \$1 million dollars of WIA funding to be used for apprenticeship. This was added to \$1.5 million in Chapter 133 funds that were approved for apprenticeship by the Commissioners earlier in the year. These training funds are available to local education agencies that sponsor apprenticeship.
- *South Carolina*'s legislature has funded *Apprenticeship Carolina*, a program whose mission is to ensure that all employers in South Carolina have access to the information and TA they need to create their own demand-driven registered apprenticeship programs. The state Workforce Investment System in partnership with their 16 state technical colleges, the USDOL/OA, and other key stakeholders, are working to enhance the competitiveness of the state's employers.
- In *Virginia*, WIA funds paid for a PSA of the Governor speaking on RA, and \$25,000 in WIA funds paid for RA printed material and website development.
- In *Alaska*, there are 25 apprenticeship specialists stationed in the One-Stops.
- The *North Dakota* Legislature increased the budget of *Operation Intern* from \$600,000 to \$900,000, which allowed the program to incorporate apprenticeships

into the program, add more internship opportunities, and expand it to include high school juniors and seniors.

2) Ratio of Apprentices to Journeypersons

The ratio issue is divisive with positions on the matter typically differing depending on affiliation (union vs. non-union). This is an issue that has consumed a great deal of time on the part of staff, SAC members, and program sponsors.

Recommendation: *Broker a compromise to resolve the ratio issue.*

- ✓ In an effort to resolve this issue, the State may wish to consider brokering a compromise or engaging in conflict resolution between the parties representing the most extreme positions on the matter.

3) State Apprenticeship Council

Members of the SAC are experienced, knowledgeable and care a great deal about RA.

Recommendation: *Engage in a retreat or planning session to discuss potential changes and develop a strategic plan for accomplishing them. Consider the following:*

- ✓ Review the scope and limitations of its authority as a Regulatory Council.
- ✓ Make a case to the state for filling the current vacancies on the SAC to reduce the likelihood of not having a quorum to hold meetings.
- ✓ Add members to the SAC, including representatives from the workforce system, vocational education, economic development, and non-construction related industries (i.e., healthcare), who may be interested in developing a RA program.
- ✓ Increase the diversity of the SAC by adding representation from women and minorities.
- ✓ Consider instituting term limits for SAC members with staggered terms.
- ✓ Make periodic reviews of policies, practices, and procedures. Update them, as warranted.

4) Regulations

Rhode Island is not in compliance with the recently revised Federal Apprenticeship Regulations on Apprenticeship. The regulations were published in the Federal Register (29 CFR Part 29 – October 29, 2008).

Recommendation: *Ensure changes in regulations be carefully reviewed and discussed by RI's SAC and staff. New regulations should be drafted to conform and comply with these new federal regulations.*

In the near future, EEO and Affirmative Action regulations will need to be rewritten to comply with the revised federal regulations that are presently being rewritten. Current state standards have no clear language on EEO obligations, particularly for programs with five or more apprentices.

Recommendation: *Write all regulations not only with the construction industry in mind but in consideration of how they might apply to non-traditional industries.*

5) Policies, Practices, and Procedures

Coffey reviewed various policies, practices, and procedures currently in use. Some have been in use for years without review and revision.

Recommendation: *Initiate a process for providing feedback to the RA staff from participants and employers. Review policies, practices and procedures periodically and amend, as warranted, to make for more efficient operations. Specifically, following are some recommended changes:*

- ✓ During the initial visit to RI, Coffey recommended formalizing the informal State policy on registering new sponsors to require that they are employing Registered Apprentices and have an approved related-instruction program. This recommendation has already been implemented.
- ✓ The sponsor registration should be revised to ask if the sponsor (an employer) is registered with the State to pay UI Contributions (and TDI) and is current with payments. The Apprenticeship Supervisor should have access to the tax data base that will allow him to assess whether or not an employer is up-to-date with UI tax payments. The inquiry date and result should be posted on the application. An employer who is not current should not be allowed to sponsor apprentices until any taxes due are paid.
- ✓ A current requirement mandates that apprentices provide a passport type photo with their applications. This makes it impossible to have applications filed electronically. We recommend that RIDLT obtain an opinion (from state legal services) on the legality of electronic signatures on sponsor and apprentice applications. If determined that it is legal, steps should be taken to move to

electronic filing. Simultaneously, a survey of sponsors should be taken to assess the need for photographs by apprentices as it relates to the RA program.

- ✓ A useful tool for review in considering any changes to apprenticeship-related policies and practices in RI is the Training and Employment Guidance Letter (TEGL) No. 2-07, which was published on July 12, 2007. A copy of the TEGL is provided in Appendix D. The DOL's stated purpose in issuing the letter was "to provide information and resources to support the use of Registered Apprenticeship by the workforce investment system as an effective approach to building a skilled and competitive workforce in regional economies." A review of TEGL No. 2-07 is recommended for the apprenticeship staff, the SAC, and state leaders from the workforce development system. This document could serve as a basis for initiating a dialog on the integration of apprenticeship with the workforce development system. It outlines DOL's vision for the integration of apprenticeship with workforce development and provides some useful examples of initiatives taken by states around the country that are consistent with this vision.

6) Data Collection and Reporting

Rhode Island has recently been awarded a grant by DOL for updating its current information system. The current legacy system is outmoded and does not produce the data elements and timely information needed to manage a large program.

Recommendation: Examine the federal system and systems other states (i.e., California) have developed to use as models of features to include in developing RI's new system.

- ✓ The existing system does not track completions, cancellations, or suspensions. These need to be tracked to measure quality.
- ✓ Retention and completion data need to be tracked, reported, and compared to test pass rates to measure the quality of programs in the licensed trades.
- ✓ Rhode Island depends on federal staff to input data into the Federal RAPIDS (Registered Apprenticeship Partners Information Data System). This is a function that should be performed by state staff. At present, RI is dependent on the federal RAPIDS systems for most of its data.
- ✓ Applications, forms, and reports should all be available electronically in a move away from a paper-based system. This will greatly aid in timeliness, accuracy, and convenience.

7) Recruitment/Marketing

There is a need to increase the pipeline of talented, interested youth, including women and minorities to RA opportunities.

Recommendation: *Include a marketing component in Rhode Island's strategic plan to attract youth, including women and minorities.*

- ✓ Increasing linkages with the workforce system and education should assist in promoting awareness of available opportunities.
- ✓ Once the staffing issue has been addressed, a marketing campaign should be designed to inform industries outside construction about the viability of RA as a workforce development solution. Linkages with economic development should be developed which could be helpful in identifying industries for which RA is an attractive option.
- ✓ Increasing the number of women and minorities in RA is an issue many programs struggle with nationally. Developing linkages with women's groups and Faith-Based and Community Based Organizations is one way to get out the word about opportunities.
- ✓ Pre-Apprenticeship and School-to-Work are both useful vehicles for recruiting a pipeline of students for opportunities within apprenticeship. For these efforts to be successful, it is necessary for personnel within the school system to recognize apprenticeship as a viable learning and career opportunity for its students. This can be fostered by developing partnerships with education.

8) Training/Improved Communication

Staff need to keep current with changes in regulations and ongoing developments and best practices within the apprenticeship community. Training and ongoing staff development opportunities need to be available to staff.

Recommendation: *Implement the following training and professional development activities and the development of a formal electronic communications vehicle to keep the apprenticeship community informed.*

- ✓ Staff should receive training on all aspects of their jobs. Some training can be secured through the DOL Regional Office. Other opportunities for training include participation in such organizations as the National Association of State and Territorial Apprenticeship Directors (NASTAD) and the Eastern Seaboard Apprenticeship Conference (ESAC). Opportunities for networking with other apprenticeship directors can be invaluable in helping to find creative solutions to problematic issues.

- ✓ Training should be requested from the DOL Regional Office for staff to better understand obligations under 29 CFR Part 29 and 29 CFR Part 30 (soon to be revised).
- ✓ Program sponsors need to receive training in all aspects of their expectations and obligations. Training is not currently taking place. One way to accomplish this is through periodic large group meetings and conferences. This is also a good way to foster communication and encourage creative ideas and solutions from participants.
- ✓ In addition to in-person meetings, consideration should be given to instituting an electronic communication vehicle (newsletter or bulletin) that would allow for timely communications with the apprenticeship community.

9) Training-Related Instruction

The use of competency-based training and E-learning/Distance learning are new concepts for many RA programs.

***Recommendation:** Consider competency-based training and e-learning/Distance learning as options provided that proper controls are in place.*

- ✓ In an effort to efficiently meet the workforce needs of industry and provide flexibility to attract more candidates to consider RA opportunities, competency-based training should be considered as a viable option, provided there is a well-developed, reliable testing method. Competency-based training may be an attractive option for some industries in non-traditional apprenticeship areas.
- ✓ Most colleges and universities are providing online undergraduate and graduate courses and degrees. The flexibility that online courses offer is welcomed by students, and it is especially appreciated by students with families and those who live in remote areas. Use of E-learning/Distance learning should be considered appropriate but only when parameters concerning its use have been developed. For example, it can be effective, especially when it is used with onsite testing and in conjunction with periodic in-person labs to ensure competency and minimize the potential for cheating.

10) Relationships/Partnerships

Partnerships with other organizations are essential if apprenticeship is to thrive and grow. The partnership with workforce development, in particular, has begun in RI and continued development is encouraged. Across the country, RA programs have struggled to get the attention of the workforce system that often does not understand RA.

Recommendation: *Develop stronger partnerships with education, economic development and the workforce system.*

- ✓ A good first step in bringing about greater mutual understanding is information sharing. Once each partner has a basic understanding of the other's program, ideas can be generated as to how they can work together to create viable career opportunities for their respective clientele.
- ✓ Education and economic development are important partners with whom relationships should be cultivated. This can be done, in part, by inviting representatives to serve on committees, boards (i.e., SAC) and work groups.
- ✓ With encouragement from Coffey, RI applied for a grant from DOL to send a team representing RA, the workforce system, education, and economic development to a federally sponsored Apprenticeship Action Clinic which will be held this summer or fall (2010). Last year OA sponsored Action Clinics for states in other regions of the country. These were highly successful in helping RA form important partnerships with other agencies that led, in many cases, to specific action plans to bring about greater integration and cooperation among partners. Every effort should be made to identify representatives from various agencies that are in positions to bring any plans that might be developed at the Action Clinics to fruition upon returning to RI.

Following is an example of what one state has done to develop partnerships and expand apprenticeship:

- *South Carolina* RA is represented at economic development meetings. The state increased funding and tax credits for apprenticeship. State technical colleges have a high level of partnering with state and local WIBs, the Department of Education, State Board of Technical Colleges, and the Department of Commerce. RA is present at all federal correctional facilities as well as the Naval Brig (correctional facility). There is an active relationship with a state approval agency for veterans' benefits - veterans can get their VA benefits as they go through an apprenticeship program. Businesses with successful apprenticeship programs are eligible for the Work Opportunity Tax Credit (WOTC).

11) Non-Traditional Apprenticeships

Nationally, there has been a movement to expand RA to industries outside construction. There is recognition that the earn-while-you-learn model is one that can work for other industries struggling to develop a skilled workforce, particularly in anticipation of the retirement of the Baby Boomers (born between 1946 and 1964). Management staff within RIDLT and members of the SAC share this recognition.

Recommendation: Explore non-traditional apprenticeships.

- ✓ One way of exploring the potential for RA in non-traditional areas is to hold informational meetings with various industry associations. Most employers outside the construction industry do not understand RA well enough to consider the possibility. WIA and ARRA funding can be used to entice industries to develop pilot projects.
- ✓ Informational materials are also helpful for industries to understand the step-by-step process associated with starting a RA program. Some of these are available through DOL, and others can be obtained from states that have developed their own materials.
- ✓ Expansion of RA into non-traditional industries presupposes staff time to work on marketing and providing technical assistance to industries that wish to adopt the model.

Here is an example of an apprenticeship program in a non-traditional area that is enjoying success:

- The number of pharmacy technicians is expected to grow faster than the average for all occupations through 2012. Faced with a large number of projected retirees leaving the occupation and an insufficient number of degrees expected to be awarded to fill the gap and meet the demand, CVS/Caremark created the Career Prescriptions for Success (CAPS) program which utilizes RA to ensure a pipeline of qualified workers. This was created by using its funds and a DOL/ETA President's High Growth Job Training Healthcare Grant. CVS/Caremark has pilot programs in five urban areas and is seeking to replicate the effort throughout the country. Upon completion of the program, trainees are eligible to work as pharmacy service associates. Further training will enable them to become lead technicians. Some workers go on to complete an Associate Degree at a local pharmacy school at CVS' expense.

Appendix A

**Letter from the
Governor's Workforce
Board
to Stakeholders**

**Governor's
Workforce
Board**
Rhode Island



1511 Pontiac Avenue, Bldg. 72, 2nd Floor
Cranston, Rhode Island 02920

Today's Vision... Tomorrow's Opportunity.

October 20, 2009

Dear

Consistent with the goals of its recently developed Strategic Workforce Plan, the Governor's Workforce Board Rhode Island (GWB) in partnership with the RI Department of Labor and Training (RIDLT), is working to expand and restructure the Rhode Island Apprenticeship Program. This restructuring includes but is not limited to improvements to the overall system, alignment with other workforce development strategies, and/or MIS integration services. The opportunity now exists to expand the capacity of the program to increase apprenticeship openings, as well as focus on current and projected high-growth, high-demand occupations and career pathways.

To assist us in this effort, we have procured the services of Coffey Consulting, LLC, a national firm which has worked extensively with apprenticeship on both the state and federal level. As part of their efforts they will be reviewing the current processes of the program's major functions. In addition, they will be soliciting input from key apprenticeship stakeholders regarding their perspective on apprenticeship and ideas for moving forward in our changing economy.

You are a stakeholder whose input we would very much value and appreciate. Please expect to be contacted by Bernie Antkowiak, John Griffin, or Bill Sullivan from the Coffey team. They will be requesting your assistance in scheduling a brief telephone interview in which they will solicit your perspective. I encourage you to participate in this process. The GWB and RIDLT will greatly appreciate your cooperation and candid responses which should assist us in our efforts to improve the effectiveness of apprenticeship in Rhode Island.

If you have questions, Coffey Consulting will be able to address your concerns. Thank you for sharing your knowledge, experience, and perspective which will greatly assist us in our efforts.

Sincerely,

John J. O'Hare
Acting Executive Director

Appendix B

**Stakeholders Survey
Instrument**

3. In your opinion, what changes need to be made in Rhode Island's Apprenticeship system to make it more effective?

A. STRUCTURE, ADMINISTRATION & FUNDING

<input type="checkbox"/> Structure
<input type="checkbox"/> Regulations
<input type="checkbox"/> Staffing Patterns
<input type="checkbox"/> Communication
<input type="checkbox"/> Management & Oversight
<input type="checkbox"/> Training

<input type="checkbox"/> State Monitoring
<input type="checkbox"/> Registration Process
<input type="checkbox"/> Policies, Practices, & Procedures
<input type="checkbox"/> Materials, Forms (need for electronic processing)
<input type="checkbox"/> Reports
<input type="checkbox"/> Funding
<input type="checkbox"/> Other

B. RECRUITMENT/MARKETING

<input type="checkbox"/> Outreach

<input type="checkbox"/> Pre-Apprenticeship Programs
<input type="checkbox"/> School-to-Work Programs
<input type="checkbox"/> Women/Minorities - Participation
<input type="checkbox"/> Non-Traditional Apprenticeship Occupations
<input type="checkbox"/> Other

C. TRAINING/RELATED INSTRUCTION

<input type="checkbox"/> Competency-Based Training
<input type="checkbox"/> National Skills Industry Standards
<input type="checkbox"/> E-Learning

<input type="checkbox"/> Distance Learning
<input type="checkbox"/> Other

D. RELATIONSHIPS/PARTNERSHIPS

<input type="checkbox"/> Relationship with Workforce Investment System
<input type="checkbox"/> Education System
<input type="checkbox"/> Economic Development
<input type="checkbox"/> Other

E. PERFORMANCE

<input type="checkbox"/> Retention

Questions regarding this survey should be directed to:

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Appendix C

**Stakeholders' Survey
Responses**

Question 1: PLEASE CHARACTERIZE IN A FEW SENTENCES THE CURRENT STATUS OF RHODE ISLAND'S APPRENTICESHIP TRAINING SYSTEM FROM YOUR PERSPECTIVE.

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<p><u>Program/General</u></p> <ul style="list-style-type: none"> • <i>In flux because of Ratio Issue</i> • <i>There is a serious lack of staff in the state to conduct monitoring and to enforce the regulations or check up on all the programs. Can't meet Federal EEO requirements with no staff</i> • <i>System is broken (ratio issue)</i> • <i>Needs a permanent SAC Director</i> • <i>Apprenticeship Division should stay where it is in Labor</i> • <i>Needs upgraded technology, tracking and computers</i> • <i>The non-union programs use apprentices temporarily and then</i> 	<p><u>Program/General</u></p> <ul style="list-style-type: none"> • <i>Apprenticeship Division is under staffed (one person)</i> • <i>Council makeup is heavily union</i> • <i>Chair person is BM from Carpenters as far as I know for 18 years</i> • <i>It has been difficult for the merit shops to establish new programs, companies that are union have an affiliation with existing apprenticeship programs and are automatically part of that program. When merit shop contractors want a program, they have to apply for a new program and always run into road blocks</i> 	<p><u>Program/General</u></p> <ul style="list-style-type: none"> • <i>Ratio an issue</i> • <i>Staff shortages</i> • <i>Apprenticeship in decline due economy</i> • <i>Needs expansion into other trades/occupations</i> • <i>Not much linkage with the One-Stops; but know that it should be a viable option for customers</i> • <i>Unsure if stakeholders have any knowledge of the apprenticeship system outside of the construction trades</i> • <i>The apprenticeship unit is significantly understaffed and underfunded - part of the Department of Labor's State funding which has been cut significantly</i> • <i>Automation is lacking</i> 	<p><u>Program/General</u></p> <ul style="list-style-type: none"> • <i>In flux because of ratio Issue</i> • <i>If it wasn't for the ratio problem, I would say that the system is fine. With the ratio problem, it is a mess.</i> • <i>Not enough apprenticeship staff</i> Must also ensure that sponsors are adhering to appropriate laws and regulations - for example if there are more than 6 apprentices, an affirmative action plan is required. Unions have been submitting them annually but non-union sponsors have not • <i>Strength is in location of program in DOL - works closely with</i> 	<p><u>Program/General</u></p> <ul style="list-style-type: none"> • <i>It is critical that the ratio be kept high (1 to 4 or 1 to 5) to keep the quality of learning a skilled trade high and to keep a safe environment for the apprentices. Don't use the ratio issue as a political football and a method for cheap labor costs</i> • <i>Not enough staff to meet the needs and requirements of apprenticeship and its regulatory mandates</i> • <i>I think that there are too many small companies with too many apprentices - these apprentices are not getting well rounded skills training</i> • <i>There is not at</i>

<p><i>they go away</i></p> <ul style="list-style-type: none"> • <i>Apprentices are being abused (lack of training and learning) by non-union programs</i> • The apprenticeship department could stay where it is currently situated, go to the Attorney General's Office or be situated in another state agency; however, unless it is made a priority and funded and staffed it makes no difference where it is housed • Particularly pleased with the passage of Chapter 37-13, the \$1 million dollar contract requirement for contractors to use apprentices in accordance with the ratios approved by the Apprenticeship Council. However, no one knows if the law is having an impact because it not monitored, etc. • Unions have an excellent relationship 	<p>such as not getting all the forms or information required to register</p> <ul style="list-style-type: none"> • <i>Right now the system is fine (referring to the Ratio issue)</i> • <i>Needs Improvement</i> • The 1-3, or higher, ratio would cause unfair hardship on merit shop contractors and they would be limited on how many they could hire, causing shortages with merit shops • The Apprenticeship Council is too "union" and gives a bad name to the DOL in the eyes of the merit shop • The RI apprenticeship system is presently very effective • A good program but could be expanded to be more open to new trades/occupations • Ratio problem if the trades ratio goes to 1-5, it would only hurt the industry and possibly put 	<p>and process is laborious</p> <ul style="list-style-type: none"> • The Council has two vacancies and though regulatory by statute do not use their authority to improve apprenticeships • Most, if not all current apprenticeships are in the building trades 	<p><i>licensing of trades</i></p> <ul style="list-style-type: none"> • In other states apprenticeship seems to be in more occupations and is much more wide spread. Rhode Island's system is not very well used in other than the construction trades • For the program we have, which is very good but underutilized and not well advertised /not well known to students and young adults • The people on the State Apprenticeship Council really care about the apprentices and apprenticeship • <i>Not enough Staff for monitoring /enforcement/education</i> • <i>Needs a permanent SAC Director</i> • <i>Needs upgraded technology, tracking and computers</i> • <i>The non-union uses apprentices temporarily and then</i> 	<p>present a strong link between related training and On- the-job training</p> <ul style="list-style-type: none"> • <i>Apprenticeship is not well known or well understood, or valued by the public</i> • Apprenticeship related instruction is not monitored well right now for attendance or content • <i>No direct knowledge of what formal apprenticeship is. We use our own informal apprenticeship</i> • <i>RI Apprenticeship is not very well known to the Workforce Development Community</i> • Need to provide more opportunities for youth • <i>The state could use more apprenticeship programs in new industries</i> • As Director of a vocational/technical school, I am concerned with the education and
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<p>with Youth Build, Helmets to Hard Hats and Job Corps and feels they are excellent feeders for apprenticeships</p> <ul style="list-style-type: none"> • If it wasn't for the ratio problem, I would say that the system is fine. With the ratio problem, it is a mess • Going good but could be better • Reciprocity a problem with people coming into RI and not qualified to be apprentices in the trade • Problem with Governor's office replacing council members. There are vacancies and people who leave do not get replaced • The Unionized sector is going very well, better than ever. We have record numbers of apprentices well trained instructors (train the trainer) • I have yet to see any proof that the non-union sector in the unlicensed trades 	<p>companies out of business</p> <ul style="list-style-type: none"> • Provides an opportunity for successive planning/training of workers • Contactors not being served • Unfair treatment of non-union programs 		<p><i>they go away</i></p> <ul style="list-style-type: none"> • <i>Apprentices are being abused in terms of what they learn and wages by the merit shops</i> • <i>Reciprocity a problem with people coming into RI and not qualified to be apprentices in the trade</i> • Problem with Governor's office not replacing council members. There are vacancies and people who leave do not get replaced • I believe this council is the backbone of working people in RI • RI is losing people in the state because there are no jobs here so they move to where they can get work • We (the council) need help from higher up • Feels system is meeting current needs - particularly as it relates to consistency of training and 	<p>employability of students to be able to become gainfully employed</p> <ul style="list-style-type: none"> • At our school, here in Warwick, we are qualified to provide electrician apprenticeship related training using their curriculum. We have done it in the past using a union instructor and we taught ABC and some Local 99 apprentices • The legislature recently passed a law regarding Vocational schools and apprentices. • <i>The system seems to be restrictive right now</i> • Students who go through our program and are able to get into a registered program have to go through the same curriculum a second time when they are in their apprenticeship • <i>Amenable to attend a forum on apprenticeship</i>
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<p>(carpenter, painter, bricklayer, or laborer) apprentices are attending related instruction classes</p> <ul style="list-style-type: none"> • It's not monitored by the state, they don't have enough people • Currently organized labor supports and sustains its own apprenticeship programs and schools while the non-union use tax money and use local school systems to teach the same trades and are not up to the standards of the union programs. You can see this by the retention and graduation rates they have compared to the organized sector • I have never seen a more dysfunctional system • Since 1978 the Council has promulgated regulations four times and the ratio is still not right • The ratio is 1-1 for all right now but the 			<p>credential attainment - in order to ensure this staff needs to be added to monitor both related education and worksites</p> <ul style="list-style-type: none"> • Given the current economy the apprenticeship program in RI is operating satisfactorily. It could be better and needs to position itself for when the recession is over. Insufficient numbers of individuals are looking to enter the trades and this is a major concern that needs to be addressed. Also, consideration must be given to expand to additional industries and occupations • Staff resources and technology need to be expanded to ensure that apprentices are getting the training and related instruction that they are supposed to be 	<ul style="list-style-type: none"> • The current system seems closed to the disadvantaged and the council is under represented by non-union and minorities • <i>System is heavily oriented to union programs - a closed system</i> • Not at all flexible • I have met with the RI Apprenticeship Council and had difficulty with them recognizing our school for related instruction • <i>Our School uses their curriculum yet they will not recognize us as a provider for other than the licensed trades, such as carpenter</i> • The state has a law 28-45-18 that says that under vocational school training, regents can provide Related Instruction for Apprenticeship • We know it (apprenticeship) is hard to get into. It could be improved
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<p>unions are maintaining their contracts at a 1-5 ratio. Contractors from adjoining states bring in programs using the 1-1 which creates a disadvantage</p> <ul style="list-style-type: none"> • There is no staff to monitor and enforce the regulations. There has been absolutely no enforcement for years • Rhode Island regulations mirror the Federal regulations and are not made specific to RI • Program is operating like 2 separate programs - union apprenticeships are operating in accordance with rules and applicable laws; non-union may be operating in a way to get inexpensive labor • Program administration is currently able to only do day-to-day work as it comes in the 			<p>obtaining. Also, reports need to be provided that adequately report the results of Apprenticeship Council actions</p>	<p>using pre apprenticeship and programs like Building Futures and other Pre Apprenticeship programs. Our experience is in programs like that</p> <ul style="list-style-type: none"> • The current status of apprenticeship is that it is very prohibitive if the ratio is changed from 1-1 • There is a feeling that although the ratio applies only to registered apprenticeship, some of the companies that contacting the Chambers don't have apprenticeship but feel that the regulation will affect them and will force them to comply for trainees or other employees • Not easily accessible by individuals • Does not reflect needs of modern workplace • Lacks flexibility
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<p>door because of a lack of staff - both OJT and related instruction are not monitored to ascertain if program is meeting requirements</p> <ul style="list-style-type: none"> • Needs tweaking • Needs defined parameters 				
<p><u>State</u></p> <ul style="list-style-type: none"> • <i>State Apprenticeship under-funded</i> • <i>State under-staffed</i> • <i>Poor monitoring - due to lack of staff</i> • <i>Ratio issue a big problem</i> • <i>Poor enforcement of rules, policies and regulations</i> • <i>Lack of proper monitoring/policing by staff</i> • <i>Lack of DOE participation</i> • <i>Regulations are not being enforced</i> 	<p><u>State</u></p> <ul style="list-style-type: none"> • <i>State Apprenticeship under-funded</i> • <i>State under-staffed</i> • <i>Poor monitoring - due to lack of staff</i> • <i>Ratio issue a big problem</i> • <i>Poor enforcement of rules, policies and regulations</i> 	<p><u>State</u></p> <ul style="list-style-type: none"> • <i>Lack of staff</i> • <i>Needs to expand into other industries not served by apprenticeship</i> • <i>Ratio issue a big problem</i> 	<p><u>State</u></p> <ul style="list-style-type: none"> • <i>Not enough staff</i> • <i>Ratio Issue</i> 	<p><u>State</u></p>
<p><u>Misc.</u></p> <ul style="list-style-type: none"> • <i>Need funding or grants to expand apprenticeship</i> 				

Question 2: WHAT ARE THE STRENGTHS OF RHODE ISLAND’S SYSTEM (What is Working Well)?

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Unions are spending a lot of money on Youth Build, building futures, etc. • Not a lot going on • New guys (staff) just coming on are just learning, not enough staff • One part-time clerical • Need to verify Related Training going on • Nothing works 100% well, the apprenticeship system needs improvement • We have a good retention and graduation rate • Reciprocity in these bad times could be better. We have a lot of apprentices but our work is slowing and the unemployment rate is 	<ul style="list-style-type: none"> • The Apprenticeship Council meets monthly • The Council reviews every application thoroughly • The Council has the ability to follow through • Unless there is a political problem, things do happen • Apprenticeship creates a safe and accurate way to train skilled trades people such as plumbers, electricians and the like, both by the book and hands on • We (our company) use apprenticeship because it works for us • Provides an opportunity for successive planning/training of 	<ul style="list-style-type: none"> • Building trades use it as a training method could expand into other industries • It does deliver a good product • <i>Need an increased effort to have diversity in workforce</i> • Current staff want to improve system. Related Instruction Training (even though never monitored) is done well in Union sponsored programs • Unit is able to obtain information on licensed trade issues, problems, and successes from inspectors who report to the same supervisor 	<ul style="list-style-type: none"> • The Committee (State Apprenticeship Council) is strength • <i>The office is good but with only one person, he can't do it all</i> • Apprenticeship is a strength and should be expanded • Apprenticeship is important for young people to learn a trade. Some are not intent on going to college and apprenticeship is an excellent alternative to making a good living. It is important to employers and the economy • Strength is in location of program in DOL - works closely with licensing of trades • Appears to be meeting needs of employers and 	<ul style="list-style-type: none"> • Sponsors are committed to maintaining high standards in recruitment, OJT and classroom training • Some programs are very serious about training, quality, and safety. Other programs give it lip service and use apprenticeship not to advance knowledge but to use the apprentices as cheap labor • I have involvement with the Union Plumbers, Electricians and Carpenters and feel that their programs are top notch. I would compare them to any in the country • The certification that registered apprenticeship brings

<p>high</p> <ul style="list-style-type: none"> • Apprenticeship helps the industries keep up with advancing technologies in each industry. It is always changing and getting more technical and people need to be certified in these different occupations and trades • There are no strengths to the Apprenticeship system we have right now, period • <i>Regulations are good but need enforcement</i> • <i>Apprenticeship is a great opportunity for a career</i> 	<p>workers</p> <ul style="list-style-type: none"> • Related instruction is strong in RI. Apprentices train at the AMTROL state-of-the-art facility with courses developed by the PHCC (Plumbing, Heating Cooling Contractors) National Association. The plumbers have been receiving training there for several years and a pipe fitters course was set up last year. Mr. Riley has been on the national council. He also is on the RI Plumbing Board • <i>Regulations are good but they need to be followed</i> • Relative cost of apprenticeship is a strength 		<p>apprentices</p> <ul style="list-style-type: none"> • I see that it is a strength that we are getting some (not enough) people into programs and employment. Apprenticeship is a training program where the participants earn money while they are trained • Regulations are good as written 	<p>with it</p> <ul style="list-style-type: none"> • I do know that apprenticeship provides OJT as well as related training for a very good training opportunity • Employers get to look at the employee while they are learning a trade • Apprenticeship is a good way for young people to learn a trade by combining hands on and classroom training • Information policy works • The oversight that the apprenticeship council has is good except it is one-sided towards union • They need to resolve the ratio issue. It is hurting everyone involved. A 1-1 ratio is preferable to 1-5 • A strength is that they do have an Apprenticeship Council • Bernie Trembl listens • Better outreach to minorities and women is needed
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				<ul style="list-style-type: none">• Recruitment of people from the immigrant community• Of all the member (Chamber of Commerce) companies we have contacting us, I have not heard one say that there are any strengths to the RI apprenticeship system
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Question 3: IN YOUR OPINION, WHAT CHANGES NEED TO BE MADE IN RHODE ISLAND'S APPRENTICESHIP SYSTEM TO MAKE IT MORE EFFECTIVE?

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • <i>More staff at least 2 full-time technical and one full-time clerical</i> • One of the technical staff in the office full time and one in the field • No comments from the field concerning the letter that went out about Coffey • <i>Misaligned between the Workforce side and the Apprenticeship side</i> • One-Stops never mention apprenticeship • Apprenticeship is a best kept secret • Word needs to get out about apprenticeship from UI and One-Stops • We wouldn't take a non-union kid into our program with the 	<ul style="list-style-type: none"> • <i>Resolve the ratio issue</i> • <i>Provide dollars for related instruction as some states do</i> • <i>Staff increase</i> • Provide a step-by-step process for new trades to be recognized, including forms and examples from other states that have approved those trades/occupations • Sometimes the inspectors for other DOL offices are looking at apprenticeship issues that apprenticeship staff should be looking at • The Council should enforce statutes that are on the books, not statutes that are not (ratio issue) • Should have 	<ul style="list-style-type: none"> • <i>Resolve the ratio issue</i> • Increase staff, automate, become financially self sufficient, fill Council vacancies, develop apprenticeships in other occupations, develop linkage with other workforce partners, keep stakeholders in the loop 	<ul style="list-style-type: none"> • <i>Reciprocity needs to be looked at and tightened up</i> • <i>They need to resolve the ratio issue</i> • <i>The State Apprenticeship office needs help by getting more staff to conduct the monitoring (checking on program requirements are being met) enforcement and making sure the union programs and the non-union programs are operating on the same playing field. There is no way of knowing if they are all doing what the regulations say or that their</i> 	<ul style="list-style-type: none"> • Independent monitoring of related instruction and OJT out there. The state does not have the staff to do it • Settle the ratio issue and make it 1-3, or 1-4, or 1-5 • Keep the quality of training up • Institute a job match assessment tool to screen potential apprentices to do well instead of putting people in who will drop out. This will keep retention and graduation rates up • The state and the Apprenticeship Council need to communicate the availability of apprenticeship (specific trades) to

<p>same credit because they would be so far behind out apprentices</p> <ul style="list-style-type: none"> • <i>They need to resolve the ratio issue in the Governor's office. It should be 1 apprentice to 3 journeyworkers</i> • Better enforcement of the rules set by the State Apprenticeship Office • Checks and balances of requirements. The unions are following the rules willingly while the non-union keeps challenging the rules and the state just doesn't have the staff to monitor them, so there is no enforcement or penalties • Programs should be monitored better to ensure that all apprentices get all the training they need to master the trade they are in for several reasons, safety, knowledge, and efficiency are 	<p>separate ratio for unlicensed trades</p> <ul style="list-style-type: none"> • Council should be responsible for jurisdiction on licensed trades not unlicensed trades • There needs to be term limits on the council members particularly the Chairperson • The Unions and the legislature need to keep their hands out of apprenticeship and let it do what it's intended to do and that is train new workers in an efficient safe manor • We will be short of needed manpower if they change the ratio from 1-1 • The unions have too much strength and they use it like a hammer against merit shops 		<p>apprentices are going to school or learning the same things that they are supposed to be learning</p> <ul style="list-style-type: none"> • <i>The office needs staff to do all the administrative things and needs staff to conduct investigations on compliance with the regulations</i> • I suggest that they consider hiring retired volunteers familiar with apprenticeship to monitor programs • Additional staff is essential. Must have a director of apprenticeship who is able to set goals, provide reports, oversee staff who monitor programs and develop a plan to increase apprentices and expand to new industries and occupations • Need to ensure that apprentices are progressing to 	<p>everyone including the WIBs</p> <ul style="list-style-type: none"> • I've just read a newspaper article on apprenticeship ratios but I don't know any more than what the article said when it comes to the ratio • Recognize our regional vocational schools as a vehicle for related instruction for all trades like they do in other states • Add a representative from the vocational career schools board to the council. Previously there was a representative from RI DOE, but he moved on. At that level, they have no knowledge or interest in the apprenticeship system • Representation of minorities and of non-union and other industry on the Apprenticeship Council • More articulation agreements
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<p>important</p> <ul style="list-style-type: none"> • <i>More staff is needed to enforce existing rules and regulations</i> • Rhode Island needs to have a wholesale overhaul of the apprenticeship system in the state • Rewrite the regulations to be more specific to this state and enforce those regulations for all programs and institute fines or penalize non compliance • If they can't do the above (resole ratio), they should be decertified and give it to the Feds • Maybe they could have partnerships with private entities to monitor programs 			<p>journey person status</p> <ul style="list-style-type: none"> • <i>Need to enforce laws</i> • Expansion example: staff should visit with the automotive industry and develop a program to train auto mechanics • Need to review occupations in which apprentices are indentured by union employers, but none are indentured by non-union employers (bricklayers, etc.) • Monitor for consistency • Need more publicity about the advantages of apprenticeship and employment in the trades • Staff should provide feedback to Council on results of votes taken at prior meetings - what happened both positive and negative - also need more information on 	<p>between apprenticeship programs and higher education that works both ways</p> <ul style="list-style-type: none"> • Make apprenticeship an acceptable way to learn a skill and make having a skill more attractive to young people instead or in addition to a degree. Change the reputation of apprenticeship • Educate the public of the value of having a skill • 30% of people who go to college graduate Apprenticeship beats that • Many meetings of the RI Apprenticeship Council are canceled because they don't have a quorum. This should be addressed • The SAC needs to be open to change and new ideas • Allow for credit for previous experience
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			<p>reasons for apprentices dropping out or not graduating. Follow-up and follow-through are important</p> <ul style="list-style-type: none"> • Allow for articulation agreements both from the programs to schools and from schools to the apprenticeship programs (written articulation for credit) administered with the help of the Governor's Workforce Board and the Board of Regents 	<p>or education to be accepted by the apprenticeship sponsor/employer rather than be regulated by the council</p> <ul style="list-style-type: none"> • As in other states, they should consider that the Related Instruction be approved by the Vocational School System regionally, and not by the State Apprenticeship Council • There needs to be a certain place kids can go and be educated to learn a trade • We train the students but the council won't recognize them nor will they give them credit even though we teach from the same books that they use in the approved apprenticeship programs • The State Council lumped us (education provider)
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				in with Job Corps and our students are not from Job Corps with a troubled background
<p><u>SAC</u></p> <ul style="list-style-type: none"> • <i>Appoint members to the State Apprenticeship Council (SAC)</i> • <i>SAC should meet regularly (quorum)</i> 	<p><u>SAC</u></p> <ul style="list-style-type: none"> • <i>Appoint members to the SAC</i> • <i>SAC should meet regularly</i> 		<p><u>SAC</u></p> <ul style="list-style-type: none"> • <i>Approve programs based on quality</i> • <i>Monitor all programs equally</i> 	
<p><u>State Staff</u></p> <ul style="list-style-type: none"> • <i>Increase staff</i> • <i>Train staff</i> • <i>Improve monitoring and enforcement of the rules - be strict but fair</i> • <i>Wages and training need to be checked for all programs - large and small</i> • <i>Hold programs accountable</i> 	<p><u>State Staff</u></p> <ul style="list-style-type: none"> • <i>More staff</i> • <i>More guidance from staff</i> 	<p><u>State Staff</u></p>	<p><u>State Staff</u></p> <ul style="list-style-type: none"> • <i>More staff</i> • <i>Train staff</i> 	<p><u>State Staff</u></p> <ul style="list-style-type: none"> • <i>More staff</i> • <i>Train staff</i>
<p><u>Online Capabilities</u></p> <ul style="list-style-type: none"> • <i>Make state forms available online</i> • <i>Fill out forms online and send by e-mail or regular mail</i> • <i>Useful website for sponsors to be able to see what's going</i> 	<p><u>Online Capabilities</u></p> <ul style="list-style-type: none"> • <i>Make state forms available online</i> • <i>Fill out forms online and send by e-mail or regular mail</i> 	<p><u>Online Capabilities</u></p> <ul style="list-style-type: none"> • <i>Use of technology</i> 	<p><u>Online Capabilities</u></p> <ul style="list-style-type: none"> • <i>Make state forms available online</i> • <i>Fill out forms online and send by e-mail or regular mail</i> 	<p><u>Online Capabilities</u></p> <ul style="list-style-type: none"> • <i>Make state forms available online</i> • <i>Fill out forms online and send by e-mail or regular mail</i>

on in real time				
<p><u>Programs</u></p> <ul style="list-style-type: none"> • Fix the ratio issue • Mandate on quality of training 	<p><u>Programs</u></p> <ul style="list-style-type: none"> • Don't "dumb down" the curriculum • Fix the ratio issue 	<p><u>Programs</u></p> <ul style="list-style-type: none"> • <i>Programs need to be expanded into industries other than the building trades</i> 	<p><u>Programs</u></p> <ul style="list-style-type: none"> • Fix the ratio issue • Information about apprenticeship on-line 	<p><u>Programs</u></p> <ul style="list-style-type: none"> • <i>Allow others to provide related training</i> • Review and improve curricula to better meet the needs of industry • Enable greater access to programs by individuals
<p><u>In General</u></p> <ul style="list-style-type: none"> • <i>Update regulations and standards</i> • Better marketing of apprenticeship opportunities • Focus on retention rates and completion rates as indicators of a good program • Non-union should be held to the same standards as union • Treat all programs equally 	<p><u>In General</u></p> <ul style="list-style-type: none"> • <i>Sponsor training</i> • Help with funding of related classroom training 	<p><u>In General</u></p> <ul style="list-style-type: none"> • <i>Update regulations and standards</i> • <i>Unit needs to be tied in with Workforce Development</i> • Get new ideas from other states • Competency-based instruction 	<p><u>In General</u></p> <ul style="list-style-type: none"> • Appoint vacancies on the SAC 	<p><u>In General</u></p> <ul style="list-style-type: none"> • Establish yearly apprenticeship conferences

Question 3A-1: CHANGES NEEDED TO MAKE RHODE ISLAND’S APPRENTICESHIP SYSTEM MORE EFFECTIVE – STRUCTURE

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<p><u>Apprentice Programs</u></p> <ul style="list-style-type: none"> • <i>Funding for more staff</i> • All the money generated is swept into general fund • Two vacancies on the council for two years. Need to fill those vacancies • Apprenticeship needs to be given resources to get the word out about apprenticeship • People who don’t do training are involved in ratio argument • Works for us but there is not enough staff to say there is even a structure • The present structure is fine but again, not enough staff • Need more staff to monitor and enforce 	<p><u>Apprentice Programs</u></p> <ul style="list-style-type: none"> • <i>They are two council members short</i> • The council is archaic • By statute the council must be 50% union represented • Union people running the program (council and inspectors) • <i>They only have one staff person</i> 	<p><u>Apprentice Programs</u></p> <ul style="list-style-type: none"> • <i>Funding for more staff</i> • Unit is situated in licensing (enforcement arm of DOL), result is no linkage with One-Stops. Currently have SAC Director and part-time clerk - can only keep up with daily work 	<p><u>Apprentice Programs</u></p> <ul style="list-style-type: none"> • <i>Funding for more staff</i> • All the money generated is swept into general fund; need a way to capture that money and keep it in apprenticeship budget • <i>Two vacancies on the council for 2 years. Need to fill those vacancies</i> • Apprenticeship needs to be given resources to get the word out about apprenticeship • People who don’t do training are involved in ratio argument • Structure Location in DOL is logical - close to industry licensing • Keep in current 	<p><u>Apprentice Programs</u></p> <ul style="list-style-type: none"> • Make it known to the public and different industries as to what apprenticeship is and how it works. • I have no in depth knowledge of the working structure of apprenticeship system. I know that there is an Apprenticeship Council • Too restrictive • <i>Structure seems fine State just needs staff.</i> • Governor’s office and the Department of Labor need to listen to the voices of the companies that the ratio that is proposed is prohibitive • The state cannot possibly think that

<ul style="list-style-type: none"> • Council should be involved in apprenticeship standards not minutia of every program and apprentice • <i>All programs should be quality programs</i> 			<p>location in DOL</p> <ul style="list-style-type: none"> • There is a capacity issue. Staffing needs to be expanded, coordination with Governor's Workforce Board 	<p>one staff person could promote, monitor and enforce the regulations</p>
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Question 3A-2: CHANGES NEEDED TO MAKE RHODE ISLAND’S APPRENTICESHIP SYSTEM MORE EFFECTIVE – REGULATIONS

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • <i>Enforce current regulations uniformly for all programs</i> • <i>Clarify rules, policies and procedures</i> • The regulations are just fine except for this ratio issue which must be settled. What’s in question is the enforcement on the regulations and staff to do that investigation and enforcement • The 1-1 ratio should not exist. It’s not safe for the apprentices. The ratio should be 1-3 • When a sponsor puts on too many apprentices, they don’t learn as much and usually just “turn them around” and don’t retain them or complete them. 	<ul style="list-style-type: none"> • Right now the regulations are fair with the ratio being 1-1 • Ratios are okay; Council is trying to make it 1-5 • I have no direct knowledge of the topic. We leave a lot up to the ABC to do our research and represent us • I only know what I have been dealing with as far as trying to register a new occupation (Fire Alarm Mechanic) and so far as I know, the regulations are fine • Enforce the rules 	<ul style="list-style-type: none"> • Revisit regulations • Even though Council is Regulatory, they generally do not take action. Unit has no regulatory authority although new federal regulations should help • Affirmative action regulations are not monitored nor enforced 	<ul style="list-style-type: none"> • <i>Enforce regulations</i> • Interpretation of regulations should be consistent • The regulations are just fine except for this ratio issue which must be settled. What’s in question is the enforcement on the regulations and staff to do that investigation and enforcement • Regulations should stay regulatory - need enforcement • Regulations - keep as Regulatory Council - if go to Advisory will be too weak and have no controls • I know that there has been a ratio issue and it has been disruptive • The RI Council 	<ul style="list-style-type: none"> • Too restrictive • Don’t know what they are specifically • Update regulations to be consistent with Federal regulations as revised

<p>They (the state) need to look at retention rates and do something about poor rates</p> <ul style="list-style-type: none"> • Rhode Island's Apprenticeship Regulations need to be re-written and enforced with penalties, fines and sanctions for non-compliance. Monies generated should be used for additional staff • Have everyone follow the same rules • Find a more user-friendly way to track hours and hold the sponsor accountable 			<p>should consider expanding into new sectors (industries)</p>	
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Question 3A-3: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM MORE EFFECTIVE - STAFFING PATTERNS

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • <i>More staff</i> • <i>More staff training</i> • <i>There is not enough staff</i> • Clearly there is not enough staff. They can't keep up with what they need to do • There is not enough staff to concentrate on administration, monitoring, promotion of new programs, enforcement, collection of data, etc. 	<ul style="list-style-type: none"> • There is not enough staff • Ideal would be 1 director of apprenticeship, 2 to 3 field staff, and 1-1/2 to 2 clerical • I have no direct knowledge of the topic. We leave a lot up to the ABC to do our research and represent us 	<ul style="list-style-type: none"> • <i>More staff</i> • <i>More staff training</i> 	<ul style="list-style-type: none"> • <i>More staff</i> • <i>More staff training</i> • Staffing patterns inadequate • Need staff to monitor performance in field and classroom; and maintain office functions • Fill the empty seats on the Council 	<ul style="list-style-type: none"> • <i>More staff to get the word out about apprenticeship</i> • Only one person can't do it all • There is not enough staff

Question 3A-4: CHANGES NEEDED TO MAKE RHODE ISLAND’S APPRENTICESHIP SYSTEM MORE EFFECTIVE – COMMUNICATION

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Need Labor Commissioner who is pro apprenticeship. Current one seems genuinely interested in apprenticeship. Former was not pro (organized) labor • Communication seems to be good among the State, the Council and the programs • Communication is very good now <ul style="list-style-type: none"> ○ For what little there is, it is good but with so few staff, how much can there be? • Former Director of Labor had inappropriate contact between her and the department by supporting the ratio of 1-1 	<ul style="list-style-type: none"> • Communication with Bernie is good - better than in the past. Bernie gets back to us right away • Communication with the council is not very good • I don't receive any communications/updates from the council or the DOL • Non-union representation on the Council 	<ul style="list-style-type: none"> • Communication within the division but little outside • <i>Council has good communication with staff and vice versa</i> 	<ul style="list-style-type: none"> • Former commissioner was not pro (organized) labor. The current one is • We seem to get all the communications from the office. The part-time help that Bernie has is great. • Communication insufficient – minimal • Most of communication comes from the Chairman of the Council • <i>Council has good communication with staff and vice versa</i> • There is a lack of communication in that there are needs for reports which are not available. We asked to get a report showing the number of apprentices in 	<ul style="list-style-type: none"> • There needs to be more communication to those entities that are in the workforce arena • I don't get much from the council • I get all my apprenticeship communication from the ABC

			Providence and we were told that we couldn't get that report in a reasonable time frame if at all. There are information technology issues that more funding and staff would resolve	
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Question 3A-5: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM

MORE EFFECTIVE – MANAGEMENT & OVERSIGHT

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Governor’s Office is too slow and does not meet the needs of apprenticeship • Not enough management and oversight of programs. It seems they look at the unions all the time but not at the other side (non-union) • Seems ok but staff is limited • SAC needs to have laws, not make their own • There is none or it is very weak • <i>More staff</i> • Sponsors need to be held accountable 	<ul style="list-style-type: none"> • With the lack of staff, there really is no management and/or oversight • Too much union favoritism • Don’t hold new programs up so long 	<ul style="list-style-type: none"> • Improve communication • Director cannot provide broad management - busy handling day-to-day 	<ul style="list-style-type: none"> • There is a move afoot to make the Council advisory (not in favor) • Governor’s Office is too slow and does not meet the needs of apprenticeship • The staff that they have, seem to know what they are doing, but they need more staff and with that comes training of the new staff. • Again, they need more staff to even do the monitoring. Monitoring seems to be non-existent and may blow up in their faces • Management & Oversight. Need program manager 	<ul style="list-style-type: none"> • I just know that the Apprenticeship Council oversees all the actions in apprenticeship • I am not familiar with how they monitor programs or monitor the council • Replace SAC members and have regular meetings

Question 3A-6: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM MORE EFFECTIVE – TRAINING

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • There is a learning curve for the new staff • <i>Train staff</i> • <i>Train sponsors</i> • Staff is trained. I see a vast improvement in the union apprenticeship training programs over the years • Training is always improving • There is no training of staff because there is no staff • Staff can't train stakeholders because there is no staff • <i>Regional forums for sponsors</i> • State-wide conference each year 	<ul style="list-style-type: none"> • As far as I know, there is no training for staff or council members • We use ABC to train our apprentices • <i>Train sponsors</i> • Related instruction should be more flexible 	<ul style="list-style-type: none"> • There is a learning curve for the new staff • <i>Training for sponsors is minimal</i> 	<ul style="list-style-type: none"> • There is a learning curve for the new staff • <i>Train staff</i> • <i>Train sponsors</i> • Training - staff need training in new program establishment, outreach, appropriate laws, etc 	<ul style="list-style-type: none"> • <i>Train staff</i> • Asking a student to do 2,000 hours a year and then go to school is a little hard • Everyone needs training, but frankly I think that they (state) are pretty stupid. The majority all leans toward union, so it's a closed society

**Question 3A-7: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM
MORE EFFECTIVE – STATE MONITORING**

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Upgrade in computerization • Not enough staff to do any monitoring • They can't monitor the programs because they have limited staff • Needs to be stronger. Especially look at the related instruction delivery, content and attendance • <i>Small programs should be monitored as closely as large ones</i> • <i>Existing staff is overwhelmed</i> 	<ul style="list-style-type: none"> • Poor at best • <i>Monitoring should be sufficient and consistent</i> • There is only one staff so how can the Department monitor the programs • The people that inspect our shops are union so there is a biased opinion • I know some of the inspectors (Licensing Board) and it seems that they are doing double duty 	<ul style="list-style-type: none"> • Upgrade in computerization • Staff to conduct monitoring or enforcement 	<ul style="list-style-type: none"> • Upgrade in computerization • Tracking. Council does not get the reports • Need a study for graduation rates, etc. • Not enough staff to do any monitoring • State Monitoring - non existent • Major Problem – monitoring not being conducted 	<ul style="list-style-type: none"> • It seems that if there are too few staff, they can't monitor • I would support better monitoring of all programs

Question 3A-8: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM MORE EFFECTIVE – REGISTRATION PROCESS

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Not a problem. We have registered apprentices recently and it went smoothly • It' is okay now • <i>Process should be thorough, consistent and held to a high standard</i> 	<ul style="list-style-type: none"> • <i>Process should be fair and quicker</i> • Non-union companies usually get tabled for a myriad of reasons, like not the proper forms, not enough information, etc. This goes back for years and reflects on the need for more staff to educate and assist sponsors in the registration process. This does not happen in other states • When we registered, it was effortless • The process so far has been fair. I have tried to have them recognize Fire Alarm Mechanic in my former job and have suspended my efforts recently because I 	<ul style="list-style-type: none"> • <i>Computerize the system to speed it up and make it more reliable</i> • <i>Make instructions for what forms and how to fill them out more available</i> 	<ul style="list-style-type: none"> • The registration process is okay but I think they should bring back the photo ID so there is no one on the job who is not registered. Of course, there needs to be more staff to monitor this and reciprocity • The State Council reviews all new programs and new apprentices. What we do not know is if those programs are following what they submit to us and without staff to conduct reviews, we cannot know • Registration Process - OK 	<ul style="list-style-type: none"> • No knowledge except that it has to go through the Apprenticeship Council • Very restrictive • I have not heard any negative feedback on the registration process • Consistency • Keep process fair • <i>Council gets into too much minutia of registration and should let the Apprenticeship Division do more of it</i>

	<p>changed places of employment. All in all, they have been fair, and I will still pursue the approval</p> <ul style="list-style-type: none">• <i>Process should be less difficult</i>			
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Question 3A-9: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM MORE EFFECTIVE – POLICIES, PRACTICES & PROCEDURES

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • All seems to be fine with Policies, Practices, & Procedures except as I said before, the staff is limited • Policies, Practices, & Procedures need to be monitored and enforced strictly • Council gets into a lot of the details where the staff could do it • <i>Enforcement should be strict</i> • <i>Need to be consistent</i> • Programs should have apprentices and training if bidding on public work • Ratio for licensed trades 	<ul style="list-style-type: none"> • It is unwritten but the unions are favored. Even when they say that the numbers are equal from employees (union) reps and employers reps, the employer reps they have are mostly those that are signatory to the bargaining agreement • Again too much union politics (union vs. non-union) • Need to be clear and easily understood 	<ul style="list-style-type: none"> • Could be more streamlined • Automate process 	<ul style="list-style-type: none"> • <i>Need to be consistent</i> • All seems to be fine with Policies, Practices, & Procedures except for the lack of staff • Revise where needed • All seems to be fine with Policies, Practices, & Procedures • The state office seems to get everything to us (the council) and they are moving steadily towards electronic processing and forms • Policies, Practices, & Procedures need to be written/rewritten 	<ul style="list-style-type: none"> • Fine • Seems to be autocratic for the unions

Question 3A-10: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM MORE EFFECTIVE – MATERIALS/FORMS (ELECTRONIC PROCESSING)

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Electronic processing will be a big improvement for us and them. It will be less paperwork • Electronic would save us a lot of time in processing and in storage. It would save the state time also • It seems that nothing is truly electronic and it should be. It would make it more efficient • <i>Electronic processing, forms, registering would be great</i> 	<ul style="list-style-type: none"> • <i>Electronic processing, forms, registering</i> • We get good information now • Electronic would only improve the process. It should be standard operating procedure. That way no one could be shorted the forms needed for registration • Would be welcomed to use electronic forms • All forms and materials should be electronic. It would be more efficient and dependable 	<ul style="list-style-type: none"> • <i>Electronic processing, forms, registering</i> • <i>Competency-based and distance learning as an alternative</i> 	<ul style="list-style-type: none"> • Not at 100% but it's okay. Could use improvement. • <i>Online access of forms</i> • Electronic processing if signatures are not a problem 	<ul style="list-style-type: none"> • <i>Electronic processing, forms, registering to speed up and make registration easier</i> • It would be a good practice to make things more effective and productive • There is a small business task force looking at the use of electronic forms • I am computer literate and feel that anything that can be should be electronic. It just makes sense

**Questions 3A-11: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM
MORE EFFECTIVE – REPORTS**

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • The reports I ask for I get. It has improved over the last few years • We get the reports we need, but they could also be electronic which would speed it up 	<ul style="list-style-type: none"> • It would help if all the reports were electronic • ABC gets the reports we need • We don't get any reports, but we have not asked for any 	<ul style="list-style-type: none"> • Could be more streamlined • Automate process 	<ul style="list-style-type: none"> • Reports we on the council receive are fine • We get reports at every meeting. The Council may not know what reports they are not getting or what is available 	<ul style="list-style-type: none"> • Electronic reporting • Make them streamlined and condensed • Electronic access and submission • Reports lack detail

Question 3A-12: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM MORE EFFECTIVE – FUNDING

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • There needs to be funding needed for more staff • Funding needed for more staff • Not sufficient and a solution would be a partnership that could supply manpower to monitor and enforce the regulations 	<ul style="list-style-type: none"> • Funding needed for more staff 	<ul style="list-style-type: none"> • <i>Fill Council seats and have meetings</i> • Improved funding • Improved marketing 	<ul style="list-style-type: none"> • Funding needed for more staff • Funding could be generated by instituting fines on those who are not in compliance, but the fines need to go back to apprenticeship and not the general fund • Funding needed for more staff/investigators 	<ul style="list-style-type: none"> • More funding for marketing, staffing, training, processing, etc. • All I know about funding is that there is a surcharge which employers pay and it subsidizes the Governor's Workforce Board. They should use some of that for staffing • Funding needed for more staff

**Question 3A-13: CHANGES NEEDED TO MAKE RHODE ISLAND'S APPRENTICESHIP SYSTEM
MORE EFFECTIVE – OTHER**

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
	<ul style="list-style-type: none"> • Fair treatment of all participants in the system 	<ul style="list-style-type: none"> • <i>Fill Council seats</i> 	<ul style="list-style-type: none"> • <i>Fill Council seats</i> 	<ul style="list-style-type: none"> • Get the word out about apprenticeship

Question 3B-1: RECRUITMENT/MARKETING – Outreach

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Outreach to non-traditional occupations/industries • In my local union we are always reaching out to minorities and women. They just don't apply for our program. I don't think there is much outreach in the other (non-union) sector • We meet with counselors and do career days all the time • Outreach has always been a problem in the construction industry, but it has improved because we are doing what we have to do • We advertise for four months and get applicants to fill our openings. We also draw from Building 	<ul style="list-style-type: none"> • Because there is a staff shortage, they cannot do the outreach that should be done • Sponsors need assistance, training etc • The state made an attempt to expand apprenticeship once and it failed because of their biased union ways, and it is threatening to new industries • Get apprentices from referrals from New England Technical Institute and word-of-mouth. More should be done in the future to ensure trades have "new blood" • Before they can do this (expand), they need to clean up their act and not be so corrupt 	<ul style="list-style-type: none"> • <i>Apprenticeship should be an overall component of Workforce Development</i> • <i>Reach out to new industries</i> 	<ul style="list-style-type: none"> • Outreach to non-traditional occupations/industries • It is adequate but it is up to each program how they outreach to groups and students 	<ul style="list-style-type: none"> • Market what apprenticeship is and what it can do • Give a true picture of what is being done now and to what skill level these apprentices are working at • Target new industries for apprenticeship but don't use building trade's mentality • Need to fix what they have and get more staff before they can do outreach and expand • There needs to be a great deal more done on the outreach of apprenticeship and what it is targeted to the minority and women populations

<p>Futures</p> <ul style="list-style-type: none"> • Until the State of Rhode Island can fix the mentioned problems (ratio, staffing), they should not expand into any new industries, occupations or recruitment • <i>Job fairs are helpful</i> • Educate guidance counselors to push apprenticeship like they push college 	<ul style="list-style-type: none"> • Need help attracting applicants • Ratio problems prevent recruitment 			
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Question 3B-2: RECRUITMENT/MARKETING – Pre-Apprenticeship Programs

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • <i>Unions are doing a good job with pre-apprenticeship</i> • <i>Merit shops are not doing much of it at all</i> • We don't do much with pre-apprenticeship but some of the unions do. I don't think the non-union uses that system at all. We do support the Vocational – Technical schools • There is a program here called Building Futures which prepares students for getting into our industry (construction). The problem is they start 100 inner city kids and only complete 14 to 16. The completers know what trade they want when they get out 	<ul style="list-style-type: none"> • I think Pre-apprenticeship is an awesome idea. It works well for everyone and they should give credit for education achieved in the programs • We work well with one pre-apprenticeship program • All for it • Very good concept and I'm for anyone having the opportunity to earn and learn. I don't know the particulars • Possible use of WIB monies for this • We use pre-apprenticeship as one source of applicants 	<ul style="list-style-type: none"> • <i>No Comments</i> 	<ul style="list-style-type: none"> • We need to educate these kids as to what apprenticeship is • They offer the person a taste of what the trade is before really getting into it • Both pre-apprenticeship and school to work offer the opportunity to “weed them out” before they are registered if they are not apt to succeed in the trade 	<ul style="list-style-type: none"> • Pre-apprenticeship does not guarantee automatic placement in an apprenticeship program • I run a pre-apprenticeship program and believe it gives apprentices (especially the disadvantaged, minorities and ex-offenders) a chance and sometimes makes a big difference • I think that they should look at this more and consider credit towards the apprenticeship when a student has taken the classes already • I run a pre-apprenticeship program where we teach health and safety, terminology, introductory skill

<ul style="list-style-type: none"> • Building Futures is a RI program for Construction trades • We also deal with city agencies to draw from • The state at present cannot deliver and until they can, they should not push pre-apprenticeship. Fix it first 				<p>training, workers rights, and workers' comp. We have 100 seats now and we are growing. We could supply new people to all the programs (union and non-union)</p> <ul style="list-style-type: none"> • Improve funding • We could be considered Pre-Apprenticeship but they don't give our students credit for the classes they have had • This is our area of expertise and there should be more collaboration between Pre-Apprenticeship and apprenticeship by utilizing workforce development funds
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Question 3B-3: RECRUITMENT/MARKETING – School to Work

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Don't use it • Not involved in that because there is no link between us and the vocational schools • We advertise with the vocational schools and conduct career days with the schools • The state at present cannot deliver and until they can, they should not push school to work. Fix it first 	<ul style="list-style-type: none"> • If they use a recognized curriculum, the council should recognize it and give classroom time credit • The state needs to recognize the courses that the vocational schools give and give the apprentices credit for classes already taken • Right now we have people who have taken the same courses in high school (tech schools) in RI and can't get the credit here so they go to MA and get their MA license and then RI recognizes the license. They are creating labor shortages in RI because these 	<ul style="list-style-type: none"> • <i>No Comments</i> 	<ul style="list-style-type: none"> • Both Pre-Apprenticeship and school to work offer the opportunity to "weed them out" before they are registered if they are not apt to succeed in the trade 	<ul style="list-style-type: none"> • Very interested in the vocational schools being part of this. There may or may not be a problem with 16 and 17 year olds being registered and with them getting full credit towards the completion of apprenticeship. It should definitely be looked at • High schools need to be shown what apprenticeship is and what it can do for young people today • We have been involved in STW programs and they do enhance an individual's opportunity to succeed

	<p>people end up going to MA or CT</p> <ul style="list-style-type: none">• Very good concept and I'm for anyone having the opportunity to earn and learn. I don't know the particulars			
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Question 3B-4: RECRUITMENT/MARKETING – Participation of Women and Minorities

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

<p>Union (Construction)</p>	<p>Non-Union (Construction)</p>	<p>Professional Staff</p>	<p>State Council</p>	<p>Other (Educators, Chambers, Associations and other industries)</p>
<ul style="list-style-type: none"> • <i>Unions reach out all the time</i> • <i>We have good participation with minorities but not so with women</i> • <i>Non Unions are not successful at all</i> • We do get a few but not large numbers. We can't make them apply • They don't apply as much as we would like to see • <i>We get too few applicants</i> • Not as many apply these days but we hire them on a regular basis. Minorities also come to us through the Building Futures program 	<ul style="list-style-type: none"> • The ABC encourages our member contractors to hire minorities and women in their apprenticeship programs • Should be open to all • Everyone should have equal opportunity to learn and earn 	<ul style="list-style-type: none"> • <i>No staff to complete monitoring for EEO participation</i> 		<ul style="list-style-type: none"> • Work readiness is needed in the pool of potential recruits • There is not enough participation in the trades. I have taught classes and see where women can out do the males in testing and meticulous work • The history of Rhode Island's apprenticeship community (both union and non-union) is poor in general • Need to be more cooperation and collaboration with these communities to increase the numbers of underutilized sectors of the population

Question 3B-5: RECRUITMENT/MARKETING – Non-traditional Apprenticeship Occupations

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • <i>There are staff shortages so they can't concentrate on new things</i> • <i>Rules and regulations change</i> • <i>Spending all our time on ratio issue</i> • Not much input or inquiries from new industries • Nursing has shown some interest but don't realize what apprenticeship can offer • There were attempts in veterinary, plastics industry but they did not get deeply involved • Apprenticeship is the best way to pass down skills from one craft person to another • Something that should be explored. Building Futures 	<ul style="list-style-type: none"> • There are trades out there that could use apprenticeship. There are also some that traditionally use higher education to educate their workers. There could be a combination where the person could start with the apprenticeship and then get the higher education • The State should get their act together before trying this. They don't have the staff and what staff they have are not knowledgeable of the different industries • They should expand in any industry/occupation where there could be hands on learning 	<ul style="list-style-type: none"> • <i>There are staff shortages so they can't concentrate on new things, spending all our time on existing programs</i> 	<ul style="list-style-type: none"> • <i>There are staff shortages so they can't concentrate on new things</i> • <i>Rules and regulations change</i> • <i>Spending all our time on ratio issue</i> • Society has to agree that different trades or occupations can be learned through apprenticeship (not just college) • <i>Apprenticeship is a good basic model for learning a trade</i> • I support non-traditional apprenticeship but the industries have to endorse and accept apprenticeship as a way of learning • Having licenses and/or credentials is important • There are a number of mid-level technical 	<ul style="list-style-type: none"> • If apprenticeship is more flexible, it could be responsive to other industries' needs • I believe that applied learning is by far the best way to train for a career • It could and should be expanded. With the Council being so strict though, I don't know if it will happen • State can't do what they have now. I see no use in expansion until they improve their situation • All for it. We are trying to do LPN training but it again is political in who does what and who is recognized • A great alternative to learning in college and could be blended with college

<p>(above) should look at some of these other trades to get them started in the industries. It would take a commitment from the employers</p> <ul style="list-style-type: none"> • Any industry should be able to use apprenticeship • I am in favor of other industries using apprenticeship as a way to train new people, but it takes buy-in from the industry/employers • It's all good to have new industries, but the state has to fix the problems before expanding 			<p>jobs that don't require Bachelors or even Associates degrees that apprenticeship could serve very well. Nursing and others in the health field being one area. Outpatient care, residential care etc.</p>	<p>programs to offer hands-on training and be industry funded</p>
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Question 3C-1: TRAINING/RELATED INSTRUCTION - Competency-Based Training

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • There is a place for it but should not be the norm • We would use it sparingly because it is possible that someone could test out at a higher level, but we generally use time-based system. If an apprentice could test out of a segment, we could advance them • I'm fine with it. We advance people if they are recommended by the employer and confirmed by the instructor. Of course, experience helps • We give credit or advance people who can supply proof of experience. Point in fact, the people we get applying form the New England 	<ul style="list-style-type: none"> • Competency-based training is a great idea. I run a school and I get paid by classroom hours, so in a way, it would hurt my school, but I still think it would benefit the apprentice • I am for it if it is fair and equitable and all are tested equally • <i>Need testing that determines level</i> • <i>Competency-based training should be recognized</i> • Committed to training - company reimburses apprentices for the cost of related instruction 	<ul style="list-style-type: none"> • Not monitored 	<ul style="list-style-type: none"> • A combination of time-based and competency-based could work especially if the kid is a slow learner. We can hold them back until they are competent • Only if there is a supervisor or mentor there. They should not be allowed to do it from home because of possible cheating 	<ul style="list-style-type: none"> • Okay but needs sponsor monitoring, good delivery system, and testing • Yes, I am all for it. Time in the seat does not always make the best qualified person. I think a good blend would be 1-year seat time and then go competency- based • National certifications of competency-based training to meet skill needs is responsive to our needs • I believe competency-based training can be very useful for some individuals to advance if they have the competency to do the job • Very valuable, great alternative to time based. You can lose

<p>Institute of Technology, we give them one year of the five- year program</p> <ul style="list-style-type: none"> • Competency-based is fine but be careful that the tasks are done right repeatedly and safely 				<p>good people if they are bored in a time based program if they are advancing faster than their class.</p> <ul style="list-style-type: none"> • It can be a more efficient way of learning
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Question 3C-2: TRAINING/RELATED INSTRUCTION - National Skills Industry Standards

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • We get national standards from our international and our instructors go to Michigan to be trained on how to teach • Through our International Union IBEW NJATC • Through our international we have standards to be met • It is good to have a standard for everyone to follow 	<ul style="list-style-type: none"> • We train using the National ABC standards for training NCCER • Yes. All for it if they can move around with the industry skills • Yes, that way people can go to any state and be accepted in their trade/occupation and find work and the employers would be assured that the individuals knows their stuff 			<ul style="list-style-type: none"> • All occupations should be held to national standards so everyone will have the same basic skills level • Definitely should have/use national standards to keep everyone on the same level

Question 3C-3&4: TRAINING/RELATED INSTRUCTION - E-Learning/Distance Learning

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Serious personal problem with distance learning because the learning can be “cheated” and I don’t think certain trades can learn on the computer. Have not approved a distance learning as yet • <i>E-learning is fine with accountability and assistance as needed</i> • I don’t like e-learning or distance learning. It is impersonal and prone to cheating • Fine, as long as there is support for the apprentice • <i>Distance Learning is fine with accountability and assistance as needed</i> • I agree it would work 	<ul style="list-style-type: none"> • <i>Hands on and one-on-one relationship should not be sacrificed</i> • I’m for it if there is a mentor in the classroom. It can be very helpful and gives students an opportunity to learn at their own pace • I am a former high school teacher, and I can’t get past the fact that it’s too easy to cheat or use the computer to get the answers • Fine, if there is testing and monitoring 	<ul style="list-style-type: none"> • Not monitored 	<ul style="list-style-type: none"> • E-learning is fine with accountability and assistance as needed • Distance Learning is fine with accountability and assistance as needed • I don’t like e-learning or distance learning. It is impersonal and prone to cheating 	<ul style="list-style-type: none"> • E-learning is fine with accountability and assistance as needed • Distance Learning is fine with accountability and assistance as needed • I know it’s not for everyone, but it can be a valuable tool. If it were integrated for some using it for missed lessons, make up etc. • Others could use it and make it work, but they still need the OJL portion for practical learning • Universities/colleges do it. It seems to be a good idea • Could work well as long as there is a good mentor for guidance

<p>for supplemental education like algebra, etc. but they need a mentor</p> <ul style="list-style-type: none"> • The State of RI is so small; there is no need for distance learning. Apprentices can get to class inside of ½ hour • <i>Hands on and one-on-one relationship should not be sacrificed</i> • <i>Both good for some aspects of training</i> • <i>Oversight to prevent abuse</i> 				<ul style="list-style-type: none"> • I worry about there being checks and balances and verification of who is doing the work
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Question 3D-1: RELATIONSHIPS/PARTNERSHIPS - Workforce Investment System

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

<p>Union (Construction)</p>	<p>Non-Union (Construction)</p>	<p>Professional Staff</p>	<p>State Council</p>	<p>Other (Educators, Chambers, Associations and other industries)</p>
<ul style="list-style-type: none"> • Not much to do with it, but I think that they should invest in apprenticeship and maybe help the state office with staff • No relationship with the Workforce Investment System • They have left us out of their focus • I sit on the board and promote the construction industry • There should be a relationship between the Workforce people and the apprenticeship community, but it shouldn't be that they are throwing money at it without having a good strategy • They don't seem interested in apprenticeship 	<ul style="list-style-type: none"> • Both systems could learn and benefit from each other. It's something that needs to happen in today's economy. They need to explore ways to work towards a common goal • I have no direct knowledge of the topic. We leave a lot up to the ABC to do our research and represent us • WIBs are more involved with themselves and can't be bothered with apprenticeship • Should be strong so that funds could be funneled to apprenticeship like it is with other industries 	<ul style="list-style-type: none"> • Not monitored 	<ul style="list-style-type: none"> • Not much to do with it, but I think that they should invest in apprenticeship and maybe help the state office with staff • WIA needs to be rewritten to include apprenticeship • I have had no personal contact with them. They have been no help • There are several objectives in the five-year plan (Governor's Workforce Board) that apply to apprenticeship, and they are very important and should be implemented 	<ul style="list-style-type: none"> • They could be the ones to offer and monitor a Job Match Assessment tool for all programs • I would be careful of it because it involves money and money can be abused. Many programs pay their own way now (unions). Would it be fair to offer others funding for having apprenticeship? What happens when the funds dry up • I've heard very little about apprenticeship and I serve on the WIB • It would be an excellent opportunity to have an "expert" give a presentation on apprenticeship to the two RI WIBs • Good history and

				<p>newcomers to the system and benefit from a good partnership with WIBs</p> <ul style="list-style-type: none">• There should definitely be a connection. They both have common goals, why not work together
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Question 3D-2: RELATIONSHIPS/PARTNERSHIPS - Education System

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Seem to fight us. No dealings with them at all • Peter Mc Walters, an ad hoc, new person has attended meeting • We instruct through the union. Other trades may use vocational schools/colleges, but there is no verification that what they learn is the same criteria as what is approved. They should all be the same • I have quite a bit to do with vocational schools, high schools, etc. I try to expose our trade to guidance counselors and students • Very little contact with education • I help approve 	<ul style="list-style-type: none"> • I am a former high school teacher and on several committees that bring vocational education and apprenticeship together • We pay for the ABC to train our apprentices at their training site. • The education system should be involved to insure proper instruction of needed courses 	<ul style="list-style-type: none"> • Identify and meet apprenticeship needs • ED Department has little involvement 	<ul style="list-style-type: none"> • There are “pockets of excellence” in Rhode Island and if that could be expanded upon and duplicated it would be good 	<ul style="list-style-type: none"> • Education made a monster when they stopped using the term “Vocational Education” when teaching skills in school. They made it a bad thing by having the students who were not classroom learners dead ended into these programs • Should be involved for related training portion • I’m sure there are linkages but I have no detail • Apprenticeship should involve the vocational education community • Education system has to be included in the mix. Some students do so well that they could enter apprenticeship with a year or so credit for

<p>vocational curriculum. I am on the electrical board</p> <ul style="list-style-type: none"> • The unions train their own and do a very good job of it. I have no other knowledge of the education system in apprenticeship 				<p>experience</p>
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Question 3D-3: RELATIONSHIPS/PARTNERSHIPS - Economic Development

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • They don't seem interested in apprenticeship • We connect with them from time to time to explore new work for the building trades • I attend meetings and push the construction industry • There are clusters of working relationships that could be expanded upon 	<ul style="list-style-type: none"> • Employers and apprentices would benefit from this type of partnership • I have no direct knowledge of the topic. We leave a lot up to the ABC to do our research and represent us 	<ul style="list-style-type: none"> • Not monitored 	<ul style="list-style-type: none"> • No contact in the past 	<ul style="list-style-type: none"> • We need to give them information on what the connection should be • Apprenticeship is economic development. Chamber of Commerce should embrace apprenticeship • It can only help to have them get involved • Yes there should be a connection between the people who train and the people who forecast the needs of jobs for the future

Question 3D-4: RELATIONSHIPS/PARTNERSHIPS - Other

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • We don't have many partnerships; we seem to get along right now • Helmets to Hardhats, Job Corps, Youth Build 				

Question 3E-1: PERFORMANCE - Retention

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Need retention rates, tracking and reports to compare • In other programs (non-union) people leave as soon as they get some experience under their belt so that they can go off and make better money. So the retention rate is not very high. I think that the state should monitor that and do something about it, like restrict registration • Retention is very important and should be tracked and monitored by the state • We have a very good retention rate • I think that 90% should be the goal and that the State 	<ul style="list-style-type: none"> • Retention rates are important if you are measuring for the right reasons. Most ABC member employers have a 75% or better retention rate. Of course you get those that get into an apprenticeship program who decide to leave because that trade is not for them. That should not count against the employer • Important but we don't have a problem keeping our apprentices. We (our company) probably pay better than the average 	<ul style="list-style-type: none"> • Need to study retention rates 	<ul style="list-style-type: none"> • Need retention rates, tracking and reports to compare • Very important. The Council needs to be informed as to why people drop out or are let go from some of these programs 	<ul style="list-style-type: none"> • Very important but again I'd put the program rates against college or university rates and see what comes out ahead • It cost \$7,500 to train an apprentice. Why, if I was the sponsor/employer, would I want that apprentice to leave? I would try to keep them • A good retention rate could promote the use of apprenticeship if apprentices tend to stay with an employer • I believe that apprentices cost employers a lot to train so they should retain everyone possible to get return on the investment

<p>should look at programs with lower rates. There should be sanctions on programs that consistently fall below a specific rate</p> <ul style="list-style-type: none"> • Very important and there needs to be a realistic benchmark of what a good retention rate (and graduation rate) is and then enforce that rate or cancel the programs. Say 50%. I don't believe the unions truly have 80% or better and the non-union rate is definitely lower, but it needs to be monitored and enforced • <i>Sponsors should not be penalized for early withdrawals from programs by apprentices who quit because they are not cut out for the job</i> 				
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Question 3E-2: PERFORMANCE - Graduation

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Need graduation rates, tracking and reports to compare • In other programs (non-union) people leave as soon as they get some experience under their belt so that they can go off and make better money. So the retention rate is not very high. I think that the State should monitor that and do something about it, like restrict registration. They should track retention and graduation (completion) rates • Graduation is very important and should be tracked and monitored by the State. • We have a very good graduation rate. It hinges on the quality 	<ul style="list-style-type: none"> • Very important and we stand behind our graduation rates • We don't abuse the system, <i>our completion rate is good</i> • Also important to get people to the level where they can do the job on their own and even teach others (successive planning) • Interim certificates for those who don't complete program 		<ul style="list-style-type: none"> • Need graduation rates, tracking and reports to compare • Very important. The Council needs to be informed as to why people drop out or are let go from some of these programs • <i>There should be a minimum of 75% completion</i> • Well run programs have good completion rates 	<ul style="list-style-type: none"> • Because of the cost to train, why would we want apprentices to leave? I would try to keep them • A successful apprentice shows a good program • Certification of completing a program is a good selling point • Graduation reflects on the quality of the program. It is everyone's goal to complete or graduate from a program

<p>of a program. I don't think that the non-union graduation rate is nearly as good as it should be</p> <ul style="list-style-type: none"> • I think that 90% should be the goal and that the state should look at programs with lower rates. There should be sanctions on programs that consistently fall below a specific rate • Very important and there needs to be a realistic benchmark of what a good graduation rate is and then enforce that rate or cancel the programs 				
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Question 3E-3: PERFORMANCE - Quality of Training

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<p><u>General</u></p> <ul style="list-style-type: none"> • Need tracking and reports • I don't think the non-union teach apprentices as well because some of them leave and come to us and are far behind • Can always use improvement • The quality of training in our program is better than it has ever been • Our quality of training is beyond reproach and I'd compare it with any. I can't say that for the other side (non-union) • This may be an unfair question because the union vs. non-union will argue about quality and who pays for the training 	<p><u>General</u></p> <ul style="list-style-type: none"> • A program needs to be a quality program to even exist. How long would it last if there was no quality • We wouldn't use apprenticeship if it didn't result in a quality worker • A must, especially in trades where safety is an issue • Keep politics of union vs. non- union out of it 	<p><u>General</u></p>	<p><u>General</u></p> <ul style="list-style-type: none"> • Need tracking and reports • All programs should be held to the same standard, but that has to be monitored and they need staff to do that 	<p><u>General</u></p> <ul style="list-style-type: none"> • Most programs are the highest in quality and try to keep the skills of their apprentices high because in this business, knowledge and skill is money • Every program is, or should be rated on the quality of their program

Question 4: WHAT ACTIONS OR STEPS NEED TO BE TAKEN TO BRING ABOUT THE CHANGES YOU THINK NEED TO BE MADE?

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Governor’s Office assistance • Moneys get swept into the general fund and just for apprenticeship • More staff to regulate and investigate that all programs are complying with the rules and regulations • Better enforcement, funding for staff in the apprenticeship office, appointments on the state apprenticeship council • <i>More staff, more funding, more monitoring of the small programs, more enforcement</i> • Investment in the Department • Re-write the regulations • Monitor, create a 	<ul style="list-style-type: none"> • Equal access for all • The Governor needs to fill the 2 empty spots on the council. Our requests have gone no further than to the Director of Labor. When we asked the Governor, the Governor didn’t even know it was his appointment to make • The Governor or the Department need to look at the political make up of the council (union vs. non-union) • Term limits on the term of the Chair of the council. I suggest 2 years union and 2 years merit shop • Need more state staff ASAP • Competency training should be looked at • Keep politics out of it 	<ul style="list-style-type: none"> • More integration with workforce system • Unless staff is increased and automation is updated and used no other changes can be made 	<ul style="list-style-type: none"> • Governor’s Office assistance • Governor’s Office needs to add staff to the apprenticeship division • Moneys get swept into the general fund and just for apprenticeship • <i>Regulations need to be enforced and monitored</i> • More funding for apprenticeship • Most important is to install a program manager who will set goals, priorities, oversee staff, expand program offerings, etc. • Need management audits of programs • Develop a budget with a source of funding • Establish minimal 	<ul style="list-style-type: none"> • Better communication/ marketing of the system • More staff to do the marketing, implementing, monitoring and enforcement • Need job match profiles done on all candidates. • Change the views of the public on what apprenticeship is • Keep the ratio high and safe. It’s not about cheap labor, it’s about skills • Broaden apprenticeship training into new industries/trades • Link high school directly with apprenticeship • Allow credits for Pre-Apprenticeship

<p>benchmark for graduation/retention rates</p> <ul style="list-style-type: none"> • Fix this ratio problem • Use partnerships to help monitor and enforce the regulation 	<p>both on the legislative end and the union end</p> <ul style="list-style-type: none"> • There is too much union control • Ratio issue should be resolved if it is not already • Flexibility • Keep politics out 		<p>standards for apprenticeships and graduation</p> <ul style="list-style-type: none"> • Develop and provide regular reports • Cannot lose sight of the need to perpetuate occupations within industries 	<ul style="list-style-type: none"> • The state should have all the union, non-union and others sit down together and work out their differences. Given the economy and all other factors, we need to help out the public getting jobs • Council needs to be made up of a more diverse group of people • There is not a history of transparency (not only with apprenticeship but government in RI) • Better network of information out among the public
<p><u>Regulation</u></p> <ul style="list-style-type: none"> • Enforcement is needed • Deregister bad programs • Examine all programs and treat them equally and consistently • Hold all programs to the same standard 	<p><u>Regulation</u></p> <ul style="list-style-type: none"> • Standards should be specific, transparent, and published • Fair to all – union or non-union • Specific criteria for filling out forms for registration 	<p><u>Regulation</u></p>	<p><u>Regulation</u></p>	<p><u>Regulation</u></p>
<p><u>Staffing</u></p> <ul style="list-style-type: none"> • <i>More staff</i> 	<p><u>Staffing</u></p> <ul style="list-style-type: none"> • More staff 	<p><u>Staffing</u></p>	<p><u>Staffing</u></p> <ul style="list-style-type: none"> • Staff 	<p><u>Staffing</u></p> <ul style="list-style-type: none"> • More staff

<ul style="list-style-type: none"> • State - market better with funds, promotional materials 				<ul style="list-style-type: none"> • Trained staff
<u>SAC</u> <ul style="list-style-type: none"> • Fill SAC vacancies • SAC meetings need a quorum 	<u>SAC</u> <ul style="list-style-type: none"> • Non-union representation on the SAC • More SAC meetings 	<u>SAC</u>	<u>SAC</u> <ul style="list-style-type: none"> • Fill Council vacancies 	<u>SAC</u> <ul style="list-style-type: none"> • SAC needs to allow some use of distance training and e-learning
<u>Funding</u> <ul style="list-style-type: none"> • <i>Funding for staff</i> 	<u>Funding</u> <ul style="list-style-type: none"> • Funding • Financial assistance • Grant money for schools for what they teach 	<u>Funding</u>	<u>Funding</u>	<u>Funding</u>
<u>Marketing</u> <ul style="list-style-type: none"> • Marketing tools for industry and staff 	<u>Marketing</u>	<u>Marketing</u>	<u>Marketing</u> <ul style="list-style-type: none"> • New marketing approaches • Market to new industries, schools, and workforce 	<u>Marketing</u> <ul style="list-style-type: none"> • Educate employers about the apprenticeship system • Apprenticeship introduced at high school level
<u>Meetings/Training</u> <ul style="list-style-type: none"> • Statewide meetings • Joint training meetings with sponsors • Sponsor training 	<u>Meetings/Training</u> <ul style="list-style-type: none"> • Sponsor training 	<u>Meetings/Training</u>	<u>Meetings/Training</u> <ul style="list-style-type: none"> • Joint training meetings with sponsors 	<u>Meetings/Training</u>
<u>Apprentice Training Structure</u> <ul style="list-style-type: none"> • College credits 	<u>Apprentice Training Structure</u> <ul style="list-style-type: none"> • Permit vendor 	<u>Apprentice Training Structure</u>	<u>Apprentice Training Structure</u>	<u>Apprentice Training Structure</u> <ul style="list-style-type: none"> • Try new things like

	training to count towards related instruction			distance learning and simulated learning
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Question 5: WHAT, IF ANY, IMPEDIMENTS/CONSTRAINTS EXIST THAT STAND IN THE WAY OF MAKING NEEDED CHANGES IN RHODE ISLAND'S APPRENTICESHIP SYSTEM?

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • No cooperation from the top • Lack of staff and funding • <i>Lack of staff and funding, more monitoring of all programs not just the unions</i> • Legislation for apprenticeship. No one can agree on what works best and it's been who can get to the politicians first and last. Lack of staff and funding to monitor reciprocity and licensing • <i>Politics – politicians, union, non-union</i> • <i>Funding</i> • <i>Need enforcement</i> • <i>Staff</i> 	<ul style="list-style-type: none"> • <i>Politics – politicians, union, non-union</i> • Make up of State Council stands in the way • <i>Lack of staff and funding create barriers</i> • The unions are using apprenticeship and the council as a tool to harass the merit shops 	<ul style="list-style-type: none"> • <i>Lack of staff</i> • <i>Ratio issue</i> • Staffing, budget, priority for Registered Apprenticeship, acknowledgement that it is a viable workforce program 	<ul style="list-style-type: none"> • No cooperation from the top • <i>Funding</i> • <i>Lack of staff</i> • <i>Lack of staff and funding</i> • <i>Funding and enforcement</i> 	<ul style="list-style-type: none"> • <i>Lack of staff and lack of funds/resources</i> • <i>Perception of apprenticeship only for building trades</i> • Traditional high school curricula • Bickering and fighting over ratios • Politics are in the way • A basic education of everyone involved so there can be a common goal. It is too one sided for the unions right now and it's not working for everyone • Allow public Education System to embrace Apprenticeship • Willingness to be open and listen to others • Consider the law passed regarding

				<p>vocational education being applied to apprenticeship</p> <ul style="list-style-type: none">• Politics - not Democrat and Republican but union vs. non-union. Who you know, etc.• Look at employment or lack of it in the state. The two bordering states employ a lot of RI residents because they are educated here and then those states recognize their value• RI traditionally has been intensely into silos and it should be more open• The Governor's Workforce Board is doing a good job
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Question 6: ARE THERE ANY OTHER TOPICS WE HAVE NOT COVERED OR ANY FINAL COMMENTS OR SUGGESTIONS THAT YOU WOULD LIKE TO MAKE?

[Note: *Italicized* text indicates repetition of answer from two or more in the same group]

Union (Construction)	Non-Union (Construction)	Professional Staff	State Council	Other (Educators, Chambers, Associations and other industries)
<ul style="list-style-type: none"> • Best kept secret • Problems are being swept under the rug • <i>Staffing</i> • <i>Funding</i> • Apprenticeship needs to have an independent report verifying what we have been saying right along • We hope your (Coffey) report will give us what we need to present to the Governor to get more attention for apprenticeship • <i>A round table discussion would produce a better result</i> • Most hostile group is the non-union electricians (because of the ratio issue) • I am a huge proponent of 	<ul style="list-style-type: none"> • <i>Will results of this survey be shared?</i> • I would just like to say that there have been many times where I get really frustrated with the way the council operates. They get bogged down in minutia and are doing things the Department should be doing • If they can't work it out, they should just be an advisory council • Or, they could give it up and turn it over to the feds and become a BAT state like New Hampshire 		<ul style="list-style-type: none"> • Cannot allow the apprenticeship system to become nothing more than a source of cheap labor • A major concern is the future of skilled occupations • The workforce is getting older and new blood is not entering the trades 	<ul style="list-style-type: none"> • <i>Would like to receive a report on this survey in aggregate form when completed</i> • <i>More funding (public and private) to fund Pre-Apprenticeship and use those students in apprenticeship</i>

<p>apprenticeship and I'm proud of the system in Rhode Island</p> <ul style="list-style-type: none"> • They might consider regionalized school system that would train the apprentices the same in every trade so everyone gets the same related training. This should be funded by the State. (I believe this is a suggestion for the non-union program apprentices.) • This is not complex, it needs to be fixed and enforced 				
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Appendix D

USDOL TEGL No. 2-07

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Registered Apprenticeship/ Workforce Investment System
	CORRESPONDENCE SYMBOL OA/OWI
	DATE July 12, 2007

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 2-07

TO: ALL STATE WORKFORCE AGENCIES
ALL STATE WORKFORCE LIAISONS
ALL STATE WORKFORCE INVESTMENT BOARDS AND STAFF
ALL LOCAL WORKFORCE INVESTMENT BOARDS AND STAFF
ALL BUSINESS RELATIONS GROUP STATE LIAISONS
ALL STATE RAPID RESPONSE COORDINATORS
OFFICE OF APPRENTICESHIP FIELD TECHNICIANS
OFFICE OF APPRENTICESHIP STATE AND REGIONAL DIRECTORS
STATE APPRENTICESHIP DIRECTORS

FROM: EMILY STOVER DeROCCO
Assistant Secretary

SUBJECT: Leveraging Registered Apprenticeship as a Workforce Development Strategy for the Workforce Investment System

1. Purpose. The purpose of this Training and Employment Guidance Letter (TEGL) is to provide information and resources to support the use of Registered Apprenticeship by the workforce investment system as an effective approach to building a skilled and competitive workforce in regional economies.

The 21st century economy demands a workforce with postsecondary education credentials, and the adaptability to respond immediately to changing economic and business needs. The public workforce system is playing a leadership role in meeting these demands by catalyzing the implementation of innovative talent development and lifelong learning strategies that will enable American workers to advance their skills and remain competitive in the global economy. Registered Apprenticeship, a critical postsecondary education, training, and employment option available in every state in the country, is an important component of these talent development strategies. Registered Apprenticeship is business- and industry-driven, with more than 29,000 programs impacting 250,000 employers and almost 450,000 apprentices — predominantly in high-growth industries that face critical skilled worker shortages now and in the foreseeable future. Full collaboration between the publicly funded workforce investment system and Registered Apprenticeship leverages each system's strengths to maximize the benefits in the context of regional talent development strategies.

RESCISSIONS None	EXPIRATION DATE Continuing
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This TEGL provides information, examples, and policy guidance to support the full integration of Registered Apprenticeship into workforce system activities. The document is one of a number of products that the Employment and Training Administration (ETA) is releasing to assist regions in developing Workforce Investment Act and apprenticeship efforts that are mutually supportive.

2. References. The Workforce Investment Act, Title I (P.L. 105-220 - August 7, 1998); 20 CFR parts 663, 665, and 666; National Apprenticeship Act (P.L. 75-308); The WagnerPeysner Act (29 USC 49 et seq.); Training and Employment Guidance Letter No. 17-05, "Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Issues;" Training and Employment Guidance Letter No. 18-05, "Using Workforce Investment Act Funds to Serve Incumbent Workers and Employed Workers;" Training and Employment Guidance Letter No. 13-06, "Instructions for Workforce Investment Act and WagnerPeysner Act State Planning and Waiver Requests for Years Three and Four of the Strategic Five-Year State Plan (Program Years 2007 and 2008);" Training and Employment Notice No. 17-06, "Vision for 21st Century Apprenticeship;" Training and Employment Guidance Letter No. 28-05: The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA): "Expanding ETA's Vision for the Delivery of Youth Services under WIA to include Indian and Native American Youth and Youth with Disabilities;" and Training and Employment Guidance Letter No. 3-04: "The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA)."

3. Overview of the National Registered Apprenticeship System. Registered Apprenticeship is a national training system that combines paid learning on-the-job and related technical and theoretical instruction in a skilled occupation. The purpose of a Registered Apprenticeship program is to enable employers to develop and apply industry standards to training programs that can increase productivity and improve the quality of the workforce. In the United States today, 250,000 separate employers offer Registered Apprenticeship employment and training to almost 450,000 apprentices in such industries as construction, manufacturing, transportation, telecommunications, information technology, biotechnology, retail, health care, the military, utilities, security, and the public sector. By providing on-the-job learning, related classroom instruction, and guaranteed wage structures, employers who sponsor apprentices provide incentives to attract and retain more highly qualified employees and improve productivity and services. Regions that adopt robust Registered Apprenticeship programs in the context of economic development strategies create seamless pipelines of skilled workers and flexible career pathways to meet current and future workforce demands.

Principal Partners. The National Registered Apprenticeship system is a partnership among DOL, State agencies, industry leaders, employers, employer associations, labor-management organizations (primarily consisting of labor organizations and employers), and educational institutions. Industries, in partnership with state and federal apprenticeship offices, develop and operate apprenticeship programs based on the skills and knowledge that business and industry needs from its employees, ensuring that apprentices develop up-to-date and relevant skills. Program sponsors, which include employers, employer associations, and labor-management

organizations, voluntarily operate and cover most or all costs of the program. The programs are registered with DOL or a federally recognized State Apprenticeship Agency (SAA). Through a formal apprenticeship agreement, program sponsors and apprentices agree to the requirements of the registered program.

The National Apprenticeship Act (NAA) (also known as the Fitzgerald Act), enacted in 1937, authorizes the Federal government, in cooperation with the states, to oversee the nation's apprenticeship system. DOL's Office of Apprenticeship (OA), in conjunction with SAAs, is responsible for registering apprenticeship programs that meet Federal and State standards, issuing Certificates of Completion to apprentices, encouraging the development of new programs through outreach and technical assistance, protecting the safety and welfare of apprentices, and assuring that all programs provide high quality training to their apprentices. DOL/OA staff in 24 states and SAA staff in 26 states, the District of Columbia, and three territories share these responsibilities.

Apprenticeship Program Structure. Registered Apprenticeship programs offer employment and a combination of on-the-job learning and related technical and theoretical instruction through a training provider. Apprentices are employed at the start of their apprenticeship and work through a series of defined curricula until the completion of their apprenticeship programs.

The duration of training, and the skills and competencies required for mastery, are driven by industry. Traditional apprenticeship programs require a specific number of hours of on-the-job training. Increasingly, industries are requiring competency-based training programs that reflect mastery of key skills and allow motivated workers to progress at their own pace. Currently, the Registered Apprenticeship system approves time-based, competency-based, and a hybrid of time- and competency-based programs, and helps industries transition to competency-based apprenticeship programs for enhanced effectiveness.

Certifications earned through Registered Apprenticeship programs are recognized nationwide as portable industry credentials. The primary apprentice certification is a Certificate of Completion, which is awarded at the end of the apprenticeship. Many apprenticeship programs - particularly in high-growth industries such as health care, advanced manufacturing and transportation - also offer interim credentials and training certificates based on a competency model that leads to a Certificate of Completion. There may be beginning, intermediate, advanced, and specialty certification levels. Registered Apprenticeship programs also allow credit for previous apprenticeship-related experience.

4. Pre-Apprenticeship Strategies. For workers who may not have the fundamental skills to succeed in a Registered Apprenticeship program and youth who are exploring career options, pre-apprenticeship training programs act as a bridge. These training programs, which are operated by education, community- or faith-based organizations, can help apprenticeship candidates decide on an occupational track, develop foundational skills, and improve productivity once employed. Pre-apprenticeship programs operate an approved plan under which candidates participate in a short, intensified training period in a school or training center, with the intent to place them into Registered Apprenticeships upon completion or soon after completion of the program. Pre-apprenticeship can be used as a means of selecting apprentices under a particular program sponsor's approved program standards. DOL recognizes pre-

apprenticeship programs, but does not formally register them. Many pre-apprenticeship programs also operate in partnership with the workforce investment system.

5. Benefits of the Registered Apprenticeship Training Model. Registered Apprenticeship is a key component to the nation's talent development strategies in many high demand industry sectors. This unique, industry-driven training is a proven, effective method with many benefits.

For employers, benefits include:

- Skilled workers trained to industry/employer specifications to produce quality results.
- Increased productivity and knowledge transfer due to well-developed on-the-job learning.
- Enhanced retention. In FY 2006, 82 percent of registered apprentices were still employed nine months after registration as apprentices.
- A stable pipeline of new skilled workers. Apprenticeship programs offer a predictable pipeline of program completers, while established pre-apprenticeship programs provide access to the next generation of workers.
- An emphasis on safety training that may reduce worker compensation costs.

For apprentices, benefits include:

- Immediate employment in jobs that usually pay higher wages and offer career growth opportunities. In FY 2006, the average starting wage for an apprentice was \$12.16.
- Higher quality of life and skills versatility.
- Portable credentials recognized nationally and often globally.
- Formal articulation agreements between apprenticeship training programs and 2- and 4-year colleges that create increased opportunities for college credit and future degrees.

6. Registered Apprenticeship Aligns with Workforce System Priorities. Registered Apprenticeship is a highly versatile training strategy that aligns with and advances the goals of key workforce investment system initiatives. Features of Registered Apprenticeship, including its customized format, the extensive industry knowledge of state and federal apprenticeship staff, and its significant employment, retention, and wage outcomes, make the program an effective means of meeting workforce system goals. By coordinating and collaborating with the knowledgeable professionals that make up the Registered Apprenticeship system, the workforce system can increase the quality of its services to both its employer and worker customers and enhance activities in support of current workforce system priorities. Apprenticeship is an important addition to the suite of potential education and training services the workforce system provides to its customers. Below are goals of the workforce system that can be met by incorporating apprenticeship as a workforce strategy.

Increasing access to workforce education and training. Adult learners with families and financial obligations frequently are unable to stop working while they gain additional education or workforce skills. Young adults may not be able to go to school full time without benefit of a job. Registered Apprenticeships are "earn and learn" opportunities and provide access to education and training that may not otherwise be accessible to many adults.

Designing innovative programs that fuel regional economic competitiveness and create employment opportunities for career seeker customers. Registered Apprenticeship training can be a valuable tool in the broader suite of talent development approaches that support competitive

regional economies and flexible talent that can adapt as jobs grow and/ or change. As an employer-driven model for competency development and skill mastery, Registered Apprenticeship can support the development and advancement of worker pipelines for both emerging and established employers and regional industry sectors. Because apprenticeship programs include immediate employment for apprentices, they are an excellent option for dislocated workers and others who are transitioning from declining industries. Registered Apprenticeship programs can also be an important part of industry growth strategies in regions where significant reskilling of the workforce needs to take place. Implementing apprenticeship and pre-apprenticeship models that are aligned with growth strategies for regionally-critical industry sectors and clusters creates opportunities for workers at all levels of the career ladder to up-skill and advance to meet evolving skill needs, and provides employers with the talented human capital needed for economic prosperity.

Meeting the needs of at-risk youth. Apprenticeship is an important talent development option for youth as they seek postsecondary education and training that will lead to career opportunities in demand-driven occupations. Registered Apprenticeship and pre-apprenticeship programs provide many benefits that allow the workforce investment system to respond to the call of DOL's Youth Vision. In addition to the industry-driven nature of apprenticeship training, apprenticeship involves high school, community colleges, and technical or alternative schools in the delivery of job-related classroom instruction. Apprenticeship also provides youth with the opportunity to earn while they learn, offers professional development and employability skills training curricula, such as that available from SkillsUSA, and incorporates instruction that leads to the completion of a high school diploma or GED.

7. Call to Integrate Apprenticeship throughout the Workforce Investment System. In a demand-driven environment, the public workforce system, at the federal, state, and local levels, works collaboratively with business and industry, economic development, education, training providers, and other key partners on talent development strategies and workforce solutions to provide workers with the skills businesses need. Registered Apprenticeship is a potential workforce solution that contributes to the development of industry-defined competencies, and also serves as a proven industry-driven workforce education and preparation strategy for workers.

The Registered Apprenticeship system is administered by ETA and represents a significant investment of knowledge, systems, and resources in our nation's talent development strategies. Registered Apprenticeship opportunities can and should be integrated throughout the workforce investment system as a means of leveraging resources across systems to better serve regional needs. In order to ensure that apprenticeship is consistently integrated into service delivery strategies for businesses and the workforce, it is critical to support collaboration between the apprenticeship infrastructure, the workforce investment system, and the continuum of education at all levels. Strategies for collaboration and integration are discussed below. Specific examples of state and local collaborative efforts are provided in more detail in Attachments A and B. Attachment C provides contact information for specific models. Attachment D provides informational tools and resources to support development of new registered apprenticeship opportunities and models.

WIA State and Local Strategic Planning. State and local Workforce Investment Boards (WIBs) have an opportunity to support integration of Registered Apprenticeship through their regular strategic planning processes for WIA and the Wagner-Peyser Act. One highly effective strategy is to include apprenticeship training as a workforce strategy in the WIA state and local plans as a workforce solution for growing skills in targeted industry sectors.

Business Engagement Strategies. WIBs and/ or One-Stop Career Centers can integrate apprenticeship into business engagement strategies by encouraging the development of new apprenticeship programs as a solution to meet business customer needs. WIBs and One-Stops can leverage business relationships and engage businesses jointly with apprenticeship staff. WIBs can further enhance strategic regional partnerships by integrating apprenticeship programming into their strategies for talent development and linking apprenticeship programs to other economic development entities and school district administrations, alternative education programs, adult basic education programs, prisons, and city, county, and state governments. An important asset that can be marketed to employers is the ability of apprenticeship staff to develop competency models which break the skills needed for any particular task into learning objects that then become the foundation for classroom curricula and training. This ensures that apprentices achieve the right skills to meet industry needs.

Expanding Available Eligible Training Providers for ITAs. The WIA statute and regulations explicitly provide for flexibility in determining registered apprenticeship training programs as initially eligible providers of ITA-funded training services. This enables expanding the available training options to ITA recipients. Specifically, the WIA regulations at 20 CFR 663.505(b)(2)(ii) identify entities that carry out programs under the National Apprenticeship Act (NAA) as potential eligible providers of training services, and the WIA regulations at 20 CFR 663.515(b) empower local WIBs to determine the eligible training provider application procedures for apprenticeship programs registered under the NAA. As such, apprenticeship programs may benefit from streamlined processes for becoming initially approved as eligible providers of training to ITA recipients, without having to undergo the standard State agency review process (20 CFR 663.515(d)).

One-Stop Career Center Operations. At the One-Stop Career Center level, a range of programmatic and operational activities can support closely integrated and coordinated functions.

- **Career Guidance Strategies.** Referral to apprenticeship and pre-apprenticeship programs can be routinely integrated into the career guidance and career exploration services offered through the One-Stop Career Center system, both virtually and as part of staff-assisted services.
- **Service Delivery Design.** Co-locating apprenticeship staff in One-Stop Career Centers allows them to work collaboratively with WIA case managers and veterans' representatives to place career seekers with apprenticeship sponsors and to market and establish programs. Even when programs are not co-located, One-Stop Career Center and Registered Apprenticeship staff can be encouraged to work together to market apprenticeship and refer appropriate candidates.
- **Coordinated Education and Career Outreach.** One-Stop Career Centers can cosponsor career fairs and other outreach activities related to education and career opportunities

with local representatives of the Registered Apprenticeship system, and can market apprenticeship opportunities to both employers and workers.

- Coordination for Pre-Apprenticeship. One-Stop Career Center staff can coordinate the development of pre-apprenticeship or training venues between participating Registered Apprenticeship programs and community-based organizations committed to provide related work experience to prepare candidates for Registered Apprenticeship.

Policy Development and Funding Strategies. Collaboration with apprenticeship can be further enhanced through the development of policies that facilitate and encourage partnership. For instance, states may issue policy to provide guidance around the operation of such partnerships, and to highlight models of successful collaboration. States and local areas may organize regular roundtables or other policy forums in which workforce system, apprenticeship system, education, and employer stakeholders are brought together to discuss policy issues and explore collaborative opportunities. State and local workforce system leaders may explore opportunities for leveraging existing workforce system funding with other funding sources to support and advance apprenticeship models. A more detailed discussion of opportunities to leverage funding follows.

8. Funding Sources to Support Registered Apprenticeship. Historically, employers, industry associations, and labor-management organizations have been instrumental in developing and funding Registered Apprenticeship programs. The public workforce system has an important role to play in leveraging and advancing these investments. This can be accomplished both through workforce system funding strategies, and through the system's unique position as the convener and catalyst of a broad array of workforce and economic development partners, all of whom have a stake in the acceleration of competency-based education and training models that enable workers to meet the evolving skill needs of the 21st century work environment. Workforce system leaders, with their education and employer partners, can play the critical role of identifying and aligning funding that may support both theoretical and practical education, advancing skills upgrading models, and supporting workers' career advancement based on increasing mastery of the skills required in current and emerging workplaces. In today's economy, states and economic regions must continuously identify new approaches to ensuring that the education levels of the current and projected workforce align with the anticipated skill and competency needs of both established and emerging industries. The workforce system can support these efforts by ensuring that the full complement of education, employer, and economic development partners, including new or "non-traditional" partners, are at the table and involved in discussions related to the alignment and commitment of resources to support innovative training and advancement models.

Leveraging Workforce Investment Act Funding. Ensuring that apprenticeship is included as part of the full complement of education and training resources provided to job seekers and employers presents multiple opportunities for the public workforce system to leverage WIA funds in innovative and creative ways. The Workforce Investment Act provides the workforce system with significant flexibility to implement responsive training and education solutions, and state and local workforce system leaders are urged to consider ways in which their existing WIA training resources may be invested strategically to support apprentices and apprenticeship sponsors. For example, while most Registered Apprenticeship programs are funded by program sponsors, the workforce system can help to expand apprenticeship programs regionally by

strategically deploying WIA funds to temporarily offset training costs for employers who might need to understand the potential returns on their investment before undertaking significant training costs. See Attachment B for specific examples of how states are using WIA funds to offset training costs.

Individual Training Accounts (ITAs)

ITAs, described at 20 CFR 663.400 - 663.440, are training and education financing accounts established on behalf of eligible adults and dislocated workers that enable these individuals to purchase training for in-demand occupations and careers from eligible providers of their own choosing. Both employed and unemployed adults and dislocated workers may be eligible to receive ITAs, though employed individuals must be determined to be in need of training services to obtain or retain employment that leads to self-sufficiency in order to receive ITAs (see 20 CFR 663.220 (b), 20 CFR 663.230, and 20 CFR 663.310, as well as the Preamble to the Final Rule for WIA, 65 Fed. Reg. 49294, 49326, Aug. 11, 2000). As the primary method of training service purchase and delivery in the public workforce system, ITAs can provide eligible apprentices with financial support for the related instruction portion of their apprenticeships. In addition, ITAs may be used to provide eligible individuals with access to pre-apprenticeship training in preparation for formal apprenticeships.

The use of ITAs to support the related instruction (e.g., classroom and distance learning) portion of apprenticeship training or pre-apprenticeship training may be advantageous for a number of reasons. ITAs support customer choice in selecting training providers, empowering apprentices and pre-apprentices to make informed education and career decisions. WIA funded training must be directly linked to employment opportunities in the local area (20 CFR 663.310(c)). This can be a useful tool to support Registered Apprenticeships' focus upon employer-driven training design and delivery.

When WIBS and One-Stop Career Centers use ITAs as a mechanism to support apprenticeships, it is important to remember the eligibility requirements associated with the WIA Adult and Dislocated Worker programs. Another consideration to keep in mind is that ITAs are only available to eligible individuals who are unable to obtain grant assistance from other sources to pay for education and training (such as State-funded training funds, Pell Grants, and Trade Adjustment Assistance), or who require assistance beyond that which is available from other grant sources in order to pay for the costs of training (see 20 CFR 663.310(d) and 20 CFR 663.320(a)(2)). The intent of these limitations is to ensure that complementary education and training resources are leveraged to the greatest extent possible, and to reduce duplication in service provision. Thus, in designing education, apprenticeship program sponsors and local WIBs should jointly identify the full complement of education and training funding available in the area.

Customized Training Models

When working with employers on training and workforce solutions, WIBs and One-Stop Career Centers may find it valuable to utilize customized training to subsidize the classroom training portion of an apprenticeship model. For example, a local WIB could offer a particular course of training for apprenticeship sponsors in a targeted sector, such as advanced manufacturing, across a region whose economic base revolves around this sector.

Local WIBs could also offer "linked" courses of training across connected industry sectors, such as construction and transportation, to more broadly support the economic clusters driving job growth in that particular region. This approach provides the ability to leverage employer investments with WIA funding to increase the skilled labor pool in a regional economy.

Customized training is typically based upon a contractual agreement between a local WIB and an employer (or group of employers) to provide specialized training to employees. Under WIA, both potential new hires and incumbent employees may participate in customized training, though incumbent employees must be determined by the local WIB to not be earning self-sufficient wages in order to participate (20 CFR 663.720(a)), and their training must be related to the introduction of new technologies in the workplace, skills upgrading for new jobs, or other related purposes (20 CFR 663.720(c)).

Customized training arrangements entail the commitment by the employer to hire trainees after successful training completion, or to continue to employ incumbent employees after successful training completion (20 CFR 663.715(b)). In addition, employers that enter into customized training agreements under WIA typically pay for at least 50 percent of the cost of the training (20 CFR 663.715(c)), though ETA has granted waivers of this matching requirement to allow for employer match on a sliding scale, based upon business size. Under the waiver, the following scale is permitted in two targeted categories of business with 100 or fewer employees:

- No less than 10 percent match for employers with 50 or fewer employees, and
- No less than 25 percent match for employers with 51 -100 employees.

WIA-funded customized training models offer several operational advantages that facilitate their use in the Registered Apprenticeship context. Customized training may be designed and delivered for multiple employers, such as in an industry sector, or for groups of targeted employees of a single employer, creating the opportunity to develop economies of scale that truly maximize and leverage the contribution of the workforce system and participating employers. In addition, while providers of customized training must meet the performance requirements outlined at 20 CFR 663.595, they are not subject to the other requirements for eligible training providers outlined in 20 CFR 663, Subpart E, or in WIA Section 122. These streamlined requirements for eligible providers of customized training may facilitate the ability of apprenticeship sponsors to collaborate with the public workforce system in the design and delivery of programs of customized training. Finally, in states that have obtained waivers to permit small- and medium-sized employers to fund customized training on a sliding scale below the mandated 50 percent, customized training provides a flexible model for assisting these smaller businesses in expanding their talent pool and upgrading the skill levels of current employees.

On-the-Job Training (OJT)

Defined at WIA Section 101(31), OJT can be a useful training methodology for employers wishing to upgrade the skills of new hires and incumbent workers and keep workplaces current with the evolving skill and technology demands of the 21st century economy. Under traditional OJT partnerships, employers fund and deliver skills upgrade training at the workplace to participating employees, and the public workforce system leverages employers' training investments by contributing up to 50 percent of the OJT participants' wages, in recognition of the

costs associated with providing the training (20 CFR 663.710). Like customized training models, OJT may provide apprenticeship sponsors with a talent development strategy that supports apprentices' increasing mastery of technical skills. Furthermore, because the content of OJT is largely designed by employers, the workforce system may find that this training model is an attractive tool for increasing and expanding its partnership with Registered Apprenticeship programs.

Similar to WIA-funded customized training models, OJT also offers several operational advantages that may facilitate workforce system and Registered Apprenticeship collaboration. Like providers of customized training, providers of OJT may take advantage of the streamlined eligible training provider requirements outlined at 20 CFR 663.595. In addition, ETA has granted waivers to states to increase their capacity to offer OJT as a talent development strategy for small- and medium-sized businesses. Under this waiver, approved states may match employers' training contributions up to 75 percent for businesses with 100 or fewer employees, which may provide an attractive incentive for smaller apprenticeship sponsors to partner with the public workforce system in the design and delivery of the OJT component of Registered Apprenticeship.

WIA State-wide Reserve and Other State Funding Sources

Governor's statewide 15 percent funds, reserved under WIA Section 128(a) for statewide activities, provide the most flexible WIA funds available to states. Up to 15 percent of funds allotted to states for adult, dislocated worker, and youth activities may be reserved by the Governor for statewide workforce investment activities and may be combined and used for any of the activities authorized in WIA Sections 129(b), 134(a)(2)(B), or 134(a)(3)(A) (which are further described in 20 CFR 665.200 and 665.210) regardless of originating funding streams. The Act and the regulations identify required statewide activities and other optional activities; these lists, however, are not all-inclusive. States have considerable flexibility to develop and implement these and other activities, including apprenticeship and pre-apprenticeship models, using reserve funds, as long as these activities are consistent with the purpose of WIA. Because individuals served with Governor's 15 percent reserve funds are not subject to the eligibility requirements of the respective funding streams from which the reserve is drawn, these funds offer a particularly flexible way to develop and grow training and education partnerships for pre-apprentices and apprentices.

Local activities funded with WIA Adult and Dislocated Worker program formula funds must conform with the eligibility requirements associated with these funding streams. States may want to seek waiver authority to allow greater flexibility in using funds to support apprenticeships. ETA has granted waivers to states to enable local areas to use up to 50% of their Adult and Dislocated Worker funds as though it were state set-aside funding, which makes the funding much more flexible and eliminates the need to determine eligibility.

In addition, incentive funds received by states under WIA Title V - General Provisions, Sections 503(a) and 503(b) and described at 20 CFR 666.200 and 666.210 are also highly flexible, and provide an opportunity for states to implement creative programs in partnership with apprenticeship sponsors. States may use these funds to carry out innovative programs under WIA Titles I and II and the Carl D. Perkins Vocational and Technical Education Act, regardless of which Act is the source of the incentive funds.

Should states wish to modify their approved incentive grant plans and corresponding grant documents to incorporate models for leveraging incentive funding for pre-apprenticeship and/ or Registered Apprenticeship, the Department will work with states to make any necessary and allowable modifications.

State workforce system leaders and apprenticeship stakeholders are strongly encouraged to consider other state funding sources to support and advance innovative pre-apprenticeship and Registered Apprenticeship. Other potential sources of funding for apprenticeship programs include state general revenue funds as well as other funds appropriated by state legislatures, such as state education monies targeted for career and technical education.

9. WIA Performance Measures and Apprenticeship. Apprenticeship strategies offer the opportunity for states and local WIBs to enhance their performance under the Workforce Investment Act. Apprenticeship is a proven model for effectively educating and training workers, promoting retention, and advancing the apprentice's career and earnings. Below is information related to performance measurement that may be useful to consider when integrating apprenticeship as an employment or training opportunity provided under WIA and/ or Wagner-Peyser.

Registered Apprenticeship as Employment. WIA and Wagner-Peyser clients who receive core and intensive services resulting in their entry into a Registered Apprenticeship program become employees of the Registered Apprenticeship sponsor and can be tracked against Common Measures associated with employment.

Registered Apprenticeship as Training. Apprentices who receive WIA services after enrollment in Registered Apprenticeship to support classroom or on-the-job training, or to provide other services, should be treated as incumbent workers. Retention and earnings outcomes should be tracked in this case, but not the placement outcome.

Identifying the Point of Exit. For the purposes of tracking and common measures, WIA and Wagner-Peyser clients associated with apprenticeship programs should be exited from the workforce system after the completion of WIA/Wagner-Peyser associated activities. It is not necessary to track apprentices through to the completion of their apprenticeship program unless they are supported by workforce system resources for the entire duration. Thus, an apprentice who receives workforce system resources to support specific portions of classroom training may be exited from the program upon completion of that training, even if they continue in the apprenticeship program for a longer period of time.

Tracking Earned Credentials. The workforce system should track only those credentials that are earned by an apprentice while they are enrolled in WIA or Wagner-Peyser. Where tracking of earned credentials is required, the workforce system should track the interim credential earned by the apprentice while co-enrolled. For example, apprentices in competency-based programs may receive a Certificate of Training upon completion of each level working towards a Certificate of Completion. Additionally, many apprenticeship sponsors have negotiated articulation agreements with community and technical colleges that give college credit for the related instruction component of the program. All of these interim credentials may be recorded as appropriate credentials for the purposes of reporting under the Common Measures.

Please note that the DOL Office of Apprenticeship (OA) tracks cohorts of apprentices throughout their participation in the Registered Apprenticeship system for the purpose of reporting outcomes and drawing conclusions about program effectiveness. The Common Measures are also used for this purpose.

10. Action Required. Registered Apprenticeship is a critical component of talent development strategies across the country. With the combination of on-the-job learning, related instruction, and mentoring, the apprenticeship model is a powerful tool for addressing the skill shortages that many industries face. It also provides the grounded expertise and knowledge individuals need to do their jobs well and advance in their careers. The model offers an efficient, flexible training strategy, responsive to new technology that will keep workers up-to-date on skills they need to do their jobs.

In the current environment of global economic competition, it is critical that the workforce investment system integrate the resources of the Registered Apprenticeship system into its talent development strategies. ETA urges state and local leaders to consider the benefits of Registered Apprenticeship while developing their workforce investment systems plans and programs and to fully utilize apprenticeship as a unique model that incorporates employment, postsecondary education, and training. Some next steps to consider include.

- Mapping existing Registered Apprenticeship programs in your region.
- Strengthening collaborative relationships between WIBs and apprenticeship staff to explore opportunities to leverage Registered Apprenticeship as a significant workforce development strategy.
- Educating One-Stops Career Centers and WIBs about Registered Apprenticeship, including how to collaborate with apprenticeship staff, how to use WIA funding in support of Registered Apprenticeship, and how Registered Apprenticeship applies to performance outcomes under the Common Measures.
- Discussing apprenticeship as a workforce tool with leaders focused on workforce issues, such as legislators, governor, mayors, county executives, council members, and department heads, and sharing with them the concepts addressed in this TEGL.
- Adopting policies and procedures to better integrate Registered Apprenticeship training as an option offered by the workforce investment system using, but not limited to, the examples found in this TEGL.
- Encouraging Registered Apprenticeship sponsors to contact their local WIBs to inform them about their training programs, inquire about becoming eligible training providers, and discuss opportunities for collaboration and partnership.

11. Inquiries. Questions should be directed to the appropriate ETA Regional Office, Office of Apprenticeship Regional Director, or State Director. Contact information can be found in Attachment D.

Attachment A

Promising Practices in Integrating Registered Apprenticeship and Public Workforce System Activities

Several states have integrated the Registered Apprenticeship model at various levels of state government as a tool to help employers meet their workforce needs and for individuals—from high school to adult learners—to enhance their career paths. Although no state is yet using the model to its maximum capacity, several states are creatively applying Registered Apprenticeship as an important workforce and career solution. The following are examples of some states that have used the Registered Apprenticeship model in innovative ways to address many economic development and workforce challenges of its business community.

Washington State

Leaders in Washington State have integrated Registered Apprenticeship into workforce strategies in a broad way. They not only use WIA funding to support training programs, but Registered Apprenticeship is included in the state strategic plan as a workforce tool. They also bring together support from other public sources, most notably the state legislature which has appropriated general funds for a variety of Registered Apprenticeship programs including outreach and awareness to schools and businesses and supporting related instruction and on-the-job training. WIA discretionary dollars have been used for programs; the WIBs and One-Stops have provided funding and support.

State Plan

The Washington State strategic workforce plan incorporates language calling for the expansion of Registered Apprenticeship training in emerging fields and expansion of preparation programs for apprenticeship in high-demand clusters. Additionally, they include language to develop new programs and to increase student enrollments and apprenticeship retention and completion.

As a result of the state's workforce policies on Registered Apprenticeship, Washington has—

- Advanced development of Registered Apprenticeship programs in health care, information technology, maritime/ transportation, energy, public utilities, and advanced manufacturing among the high-growth industries.

- Prepared individuals to enter Registered Apprenticeship programs or gain employment in supportive roles in industries that use the apprenticeship model.

- Supported projects to provide training to more than 500 pre-apprentices and apprentices in food processing, biotechnology, communications, health care, construction and manufacturing.

WIA Funding

WIA state-wide reserve funds have been used for Registered Apprenticeship programs through competitive solicitations.

Local WIBs and One-Stops

The Pierce County WIB funded an innovative program, *Get Electrified*, an Electrical School to Apprenticeship program, offered to high school juniors in the Tacoma School District. It is a pre-

apprenticeship program that prepares students to meet the rigorous application requirements of an electrical apprenticeship. During the nine-week summer program, students attend work and class and earn a wage for work done. Upon completion of high school, the graduate can enter a Registered Apprenticeship program in electrical work.

Apprenticeship Integration into K-12, and Post-secondary Education Systems

The state has embraced Registered Apprenticeship as a career path in and of itself as well as a path in conjunction with community college and a four-year degree, as many of the training programs require an advanced degree. Now state leaders see the importance of career and educational guidance starting in middle school and are incorporating information about apprenticeship into that effort.

The state legislature has recently funded an initiative by the Department of Labor and Industry to enhance an Educational Guidance model for 6th through 12th graders, *Navigation 101*, which shows students various careers and what classes and activities they need to pursue for the job. The model includes a lively, student-friendly website, curriculum, and other material. Information on Registered Apprenticeship is prominently featured.

The legislation also:

- Authorized existing Community Colleges' Centers of Excellence to compile and provide information related to grants, scholarships, job openings, and growth industries;
- Required the Washington State Apprenticeship and Training Council (WSATC) to lead an educational outreach program about apprenticeships for students and educators; and
- Required the Washington State Apprenticeship Training Council to manage direct-entry programs, including awarding ten incentive grants for school districts to negotiate and implement agreements with local apprenticeships.

Inter-agency collaborations

The legislature passed a law to allow the Washington State Department of Transportation to implement an apprenticeship program for Washington State Department of Transportation construction. This apprenticeship utilization requirement started with local municipalities and private contractors 12 years ago and has grown over the years to include school districts, counties, other state agencies and private work also to encourage the development of more opportunities for young people.

The Washington State Apprenticeship Program Manager is an active participant and member of the Washington State Workforce Education and Training Coordinating Board Interagency Committee and attends their regularly scheduled meetings. At these meetings, the program manager is able to talk with other state agencies' representatives about how apprenticeship can be better integrated with other State workforce investment system partners. Apprenticeship in Washington State aligns with the Governor's economic plan called "Next Washington" and the Workforce Board's "Washington Works" report that reviews the workforce development system.

Next steps

Washington State would like to develop structured training on Registered Apprenticeship for all One-Stop Career Center staff to be more effective in educating the business community about the benefits of Registered Apprenticeship.

Kansas

Kansas State leaders have recognized the value of Registered Apprenticeship as a tool to help employers meet their workforce needs and the overall necessity to link workforce development to economic development.

State Organization of Registered Apprenticeship in Workforce Development

The state has looked at how structurally it can best organize government functions to meet their goals. To this end, state government was reorganized with many workforce functions placed in the Commerce Department including Registered Apprenticeship, Veterans Affairs, and WIA functions. These programs had previously been in the State Department of Labor. Among some of the other structural shifts, several Registered Apprenticeship staff members are housed in One-Stops across the state so they can work with employers seeking assistance.

Internal Staff Development

To better train its own staff, and to address the newly established roles and responsibilities under Public Law 107-288 and the requirements to develop a certification program, the Department of Commerce established a Registered Apprenticeship program for Career Development Technician for the Disabled Veterans Outreach Program and Local Veterans Employment Representative staff.

WIA Funding

The state uses some of its 15 percent state set-aside funds to support Registered Apprenticeship staff.

Local WIBS and One-Stops

Several local WIBS fund components of Registered Apprenticeship programs including the cost of related instruction, uniforms and tools for apprentices. WIA Incumbent Worker monies are used to help Registered Apprenticeship programs in manufacturing, construction, and health care in four of the five workforce investment regions in the state. Additionally, the Department of Social and Rehabilitation Services funds the Early Childhood Associate Apprenticeship program through a grant.

Additional Examples of Apprenticeship Integration in the Workforce System

Action	State
Include apprenticeship in the WIA state plan	AK
	MO
	WA
Apprenticeship and WIA functions located in same department	HI
	KS
State Apprenticeship Council member sits on the state WIB	NC
Co-locate apprenticeship staff in One-Stop Career Centers	KS
	VT
One-Stop and Apprenticeship staff jointly market apprenticeship even when not co-located	NC
	OH
	OR
Use Registered Apprenticeship for staff development	KS
Link apprenticeship programs to other public entities such as school districts, prisons, and city, county and state governments.	PA
	NC
	OR
	WA
Integrate the apprenticeship electronic database with the state job-matching system	OH
	OR
	VT

Attachment B
Use of Workforce Investment Act Funds to Support Registered Apprenticeship

Activity				
Encourage entities to sponsor and register new programs and occupational training, including the cost of OJT and related instruction	Guam in partnership with the Guam Shipyard and Guam Power Authority. Since inception, nearly \$1.4 million in WIA funding has been invested in salaries, benefits, and educational assistance.	The Durham, North Carolina WIB recently issued a RFP for a health care initiative using the DOL Health Career Lattice model, which integrates apprenticeship for the Certified Nursing Assistant level. The Winston-Salem WIB granted \$15,000 to a tool & die trade program.	Pennsylvania's Job Ready program, which is a combination of WIA and private funds, supports apprenticeship training programs. The local WIBs also regularly support apprenticeship training.	The West Virginia State WIB has funded apprenticeship programs in aerospace and wastewater treatment.
Provide related instruction or other education that satisfies specific apprenticeship requirements.	Kansas WIBS pay the cost of related instruction and purchase uniforms and tools for apprentices.	The Winston-Salem, North Carolina WIB provided \$37,000 to a sponsor to pay for related instruction for the Senior Maintenance Tech trade.	South Dakota provides \$50,000 to 10 sponsors to help pay for related instruction from the Governor's WIA Discretionary Fund.	
Supplement Apprentices' wages	Idaho and Boise State University will fund a pilot project in Advanced Manufacturing. The state will use \$50,000 from WIA set-aside funds to pay half the apprentices' wages for the first three months. The university will fund the costs of related instruction for the first year.			
Provide on-the-job training/learning	Alaska's local workforce centers agree to pay up to 50 percent of the employers wage costs for the first 1,000 hours of apprenticeship. In this way, employers evaluate the trainee's soft skills and can make a reasonable assessment of the individual's capacity to complete the training.	Maryland used its WIA discretionary dollars to provide matching funds for customized training. In 2006, it granted a 50-50 match for an incumbent health care worker apprenticeship program.		

Disseminate information about apprenticeship programs	Many states routinely co-sponsor career expos with the state apprenticeship office and the federal Office of Apprenticeship.	Maryland's state WIB has provided \$50,000 of its performance measures incentive funding to the State Apprenticeship Agency to market apprenticeship in the state.		
Pre-apprenticeship or preparatory training designed to provide related work experience to prepare candidates for Registered Apprenticeship	California's Greater Long Beach WIB sponsors a Construction Jobs Initiative which provides pre-apprenticeship training and builds connections between the One-Stop Centers and Registered Apprenticeship programs.	Pennsylvania's Lancaster County WIB has partnered with the Keystone Chapter of the Association of Builders and Contractors to conduct pre-employment training; the Wilkes-Barre WIB is partnering with the Building and Construction Labor-Management Council and local school districts to prepare at-risk youth to enter into apprenticeship programs.	Washington State supports pre-apprenticeship programs for 500 individuals in food processing, biotechnology, communications, health care, construction and manufacturing from the Governor's WIA Discretionary Fund.	

Attachment B
Other Funding Sources for Apprenticeship Program

Activity			
Encourage entities to sponsor and register new programs and occupational training including the cost of OJT and related instruction	Alaska's Denali Fund uses state Department of Labor funds to support tuition, instructor's wages, books, tools, required clothing, incidental stipends, lodging, transportation, and administration.	Guam signed into law the Guam Registered Apprentice Program (GRAP) to invest in skilled training in the form of tax incentives	Vermont's Workforce Education and Training Fund, a state program funded by the state legislature to help employers with workforce development issues, has regularly funded apprenticeship proposals.
To provide related instruction or other education that satisfied specific apprenticeship requirements.	Seventy percent of Guam's Manpower Development Fund goes to the Apprenticeship Training Program at the Guam Community College. The revenue source is registration fees on nonimmigrant temporary workers.	Washington State Legislature awarded 10 incentive grants from the General Fund for school districts to negotiate and implement agreements with local apprenticeship programs.	The Texas Workforce Commission supports the apprenticeship program with \$1.6 million per year from General Revenue funds under Chapter 133 of the Texas Education Code. The program helps support the cost of classroom instruction.
To provide on-the-job training/learning	Alaska has a state training and employment program (STEP) which is funded by UI Trust fund contributions. Funds have been used for individuals who don't qualify for WIA support. STEP funds have been used for construction apprenticeships.		
To disseminate information about apprenticeship programs:	Washington State legislature provided funds to the Apprenticeship and Training Council to promote apprenticeship to high school students and educators in 2006.		
To develop and provide pre-apprenticeship or preparatory training designed to provide related work experience to prepare candidates for Registered Apprenticeship.	The District of Columbia provides \$1.2 million to support pre-apprenticeship programs with General Revenue funds to apprenticeship sponsors. Upon completion, sponsors have agreed to take students who complete the program.		

Attachment C Contact Information for Cited Programs

Alaska: John Hakala (federal), State Apprenticeship Director, 907/271-5035, Hakala.john@dol.gov; Mike Shiffer, Assistant Director, Division of Business Partnerships, Alaska Department of Labor and Workforce Development, 907/269-3729, mike.shiffer@labor.state.ak.us

California: Long Beach WIB: Patty Garcia (federal), Acting State Apprenticeship Director, 415/975-4007, Garcia.patricia@dol.gov; Glen Forman, Division of Apprenticeship Standards Department of Industrial Relations, GForman@dir.ca.gov, 415/703-4920; George Fernandez Program Coordinator, Center for Working Families, Long Beach CA 90806, 562/5703728, george.fernandez@longbeach.gov

District of Columbia: Lewis Brown, Director, D.C. Apprenticeship Council, 202/6985099, lewis.brown@dc.gov; Daryl Hardy, Administrative Officer, Department of Employment Services, 202/698-5146, darylg.hardy@dc.gov

Guam: Alfred Valles (federal) State Apprenticeship Director, 808/541-2519, valles.alfred@dol.gov; Maria Connelley, Director of Labor, 671/565-2237, connent@ite.net

Hawaii: Alfred Valles (federal) State Apprenticeship Director, 808/541-2519, valles.alfred@dol.gov; Elaine Young, Administrator, Workforce Development Division, Department of Labor and Industrial Relations, 808/586-8837, eyoung@dliir.state.hi.us

Kansas: Loretta Shelly, Director, Apprenticeship Program, Kansas Department of Commerce, 785/296-4161, lshelley@kansascommerce.com; Armand Coprology, WIA Program Manager, Kansas Department of Commerce, 785-296-7876, acorpolongo@kansascommerce.com

Maryland: Robert Laudeman (federal) State Apprenticeship Director, 410/962-2676, Laudeman.robert@dol.gov; David Ghee, (state) Maryland Apprenticeship & Training Program Division of Workforce Development, 410/767-2246, www.dllr.state.md.us

Missouri: Neil Perry (federal), Apprenticeship Director, 314/539-2522, perry.neil@dol.gov; Janeen Osborne, Workforce Development Specialist, Division of Workforce Development 573/526-8260, janeen.osborne@ded.mo.gov

Pennsylvania: Thomas Bydlon (federal), Apprenticeship Director, 717/221-3496, Bydlon.thomas@dol.gov; A. Robert Rascality, (state) Director Bureau of Labor Law Compliance, PA Department of Labor and Industry, 800/932-0665, arisaliti@state.pa.us

Ohio: Mary Ann Dayspring (federal) Apprenticeship Director, 614/469-7375, Dayspring.MaryAnn@dol.gov; Jean Sickles (state) Director, Ohio State Apprenticeship Council, 614/644-2242, SICKLJ@odjfs.state.oh.us; Julie McKay, program specialist, Ohio Department of Job & Family Services, 614/466-9692, MCKAYI@odjfs.state.oh.us

Oregon: Anne Wetmore (federal), Apprenticeship Director, 206/553-0076, Wetmore.anne@dol.gov; Stephen Simms, Director, Apprenticeship and Training Division, Oregon State Bureau of Labor and Industries, 503/731-4891, steve.simms@state.or.us; match Skills: David Allen, 503/526-2774, david.k.allen@state.or.us

South Dakota: Don Reese (federal), Apprenticeship Director, 605/330-2566, Reese.Donald@dol.gov;

Texas: Dennis Goodson (federal) Apprenticeship Director, 512/916-5435, Goodson.Dennis@dol.gov; Desiree Holmes, 512/936-3059, Desi.Holmes@twc.state.tx.us

West Virginia: Kenneth Milnes (federal), Apprenticeship Director, 304/347-5794, milnes.kenneth@dol.gov

Washington State: Anne Wetmore (federal), Apprenticeship Director, 206/553-0076, Wetmore.anne@dol.gov; Elizabeth Smith, Apprenticeship Program Manager, Department of Labor and Industries, 360/902-5320, smeI235@lni.wa.gov; Jamie Krause, WA State Workforce Training Coordinating Board, 360-753-5660, jkrause@wtb.wa.gov

Attachment D

Informational Tools & Resources to Support Development of New Registered Apprenticeship Opportunities and Models

Informational Materials available through Office of Apprenticeship Web site
<http://www.doleta.gov/OA/etadefault.dm>

General Information Brochures

- For Employers - Registered Apprenticeship - Building a Skilled Workforce in the 21st Century
(http://www.doleta.gov/oa/brochure!building_skilled_workforce.pdf)
- For General population: High Wage, High Skill- Career Opportunities in the 21st Century
(http://www.doleta.gov/oa/brochure/high_wage_high_skill_careers.pdf)

Industry Facts Sheets provide explanations of Registered Apprenticeship in various industries (<http://www.doleta.gov/oa/e-tools2.dm#factsheets>)

Setting Up an Apprenticeship Program presents information about how to start a program and provides a link to local apprenticeship staff who can offer free technical assistance.
(<http://www.doleta.gov/OA/setprgm.dm>)

Bulletins/Circulars of High Growth Occupations - Announcements and information about new apprenticeship programs and apprenticeable occupations
(<http://www.doleta.gov/oa/whatsnew.dm>)

Demand-Driven Case Studies - "Registered Apprenticeship Trends in Six Industries"
(<http://www.doleta.gov/oa/e-tools.dm#brochures>)

- Advanced Manufacturing
- Information Technology
- Geospatial Technology
- Maritime
- Health Care
- Military

Contact Information

- Office of Apprenticeship, State Offices
(<http://www.doleta.gov/oa/stateoffices.cfm>)
- State Apprenticeship Agencies
(<http://www.doleta.gov/oa/stateagencies.cfm>)
- Office of Apprenticeship Regional Offices
(<http://www.doleta.gov/oa/regdirlist.dm>)
- Office of Apprenticeship, National Office
([http://www.doleta.gov/oa\(national.dm](http://www.doleta.gov/oa(national.dm))

Related Information

WIRED Web site - The WIRED Web site is a comprehensive online resource for the WIRED initiative. The Web site houses information about the initiative, a fact sheet, and a description of the Road to WIRED. The WIRED resource library provides resources to communicate the concepts and ideas of economic transformation and the WIRED Initiative and offers a suggested reading list. The "WIRED Regions" page shows the map of WIRED Regions, a one-page description of the regional projects, and each region's working implementation plan. This tool is available on-line at: <http://www.doleta.gov/wired/>

Careervoyages.gov - This joint Departments of Labor and Education Web site focused particularly on young people and career changers includes useful apprenticeship information by industry (<http://www.careervoyages.gov/apprenticeship-main.dm>). Contact information for Registered Apprenticeship program sponsors can be found through a search locator on each industry's web page.

InDemand Magazine - This resource from the Employment and Training Administration is for students, guidance counselors, and parents to provide information on careers in high-growth industries, including those in science, technology, engineering, and math. This magazine is available at: www.careervoyages.gov/indemandmagazine-stem.dm

YouthBuild Guide to Expanding Opportunities with Trade Unions - This manual developed by YouthBuild U.S.A provides information for local interactions between YouthBuild programs and skilled trades labor management organizations. The manual is available on-line at: <http://www.youthbuild.org/site/c.htIRI3PIKoG/b.13605291/apps/s/content.asp?ct=1974993>