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Principles for a High-Quality Pre-Apprenticeship

A Model to Advance Equity

CLASP

Policy solutions that work for low-income people

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Each potential equity strategy we consider merits the question: are we dismantling these oppressive systems of power, repairing their effects, or accommodating them?

Introduction

In the United States, apprenticeships have traditionally been considered the purview of the construction industry and a handful of other trades. But recent interest in developing nontraditional career paths has led to an expansion of apprenticeships into industries such as healthcare, childcare, advanced manufacturing, public safety, hospitality, information technology, cybersecurity, and more. For the many people who have been shut out of opportunities to enter or advance in these fields, this expansion holds great promise. Diverse pre-apprenticeships have the potential to help people access a career path that offers livable wages and benefits. These jobs are family-sustaining opportunities, supporting a worker and their family's economic security.

As public investment in apprenticeships grows at both the federal and state levels, we must proactively ensure equitable access to these opportunities. Many of the same barriers that exclude people from other career pathways exist for apprenticeships as well. Pre-apprenticeship can be one tool to address some of these barriers— a stepping-stone that expands access to apprenticeships.

This report outlines principles to guide federal, state, and local decision-makers and partners in developing equitable pre-apprenticeship programs and policy. These principles can mitigate the risk of investing in low-quality programs that lead to nowhere. This risk is especially high as the current Administration seeks to develop minimally regulated Industry Recognized Apprenticeship Programs (IRAPs), which would limit quality assurance and extend few labor protections to apprentices. Pre-apprenticeship policy must provide a framework of accessibility, quality, equity, and opportunity for advancement in family-sustaining careers. As Congress considers reauthorizing the National Apprenticeship Act and the Workforce Innovation Opportunity Act, it must seek to promote high-quality pre-apprenticeships, and the vitally important role they can play in helping to increase the participation of youth, women, people of color, immigrants, and formerly incarcerated individuals in Registered Apprenticeships. Federal and state policies must seek to reduce disparities and the historic inequality in the nation's long-standing workforce and labor pipeline.

Developing actionable principles to promote equity

A critical step to advancing equity in pre-apprenticeships is to clearly define the key components of a high-quality pre-apprenticeship—the principles we define below. To inform our best thinking on policy and practice in developing these principles, the Center for Law and Social Policy (CLASP) engaged a wide range of experts and thought leaders. They included advocates, policymakers, practitioners, and representatives from labor and industry. CLASP drew on their expertise in a series of interviews, an in-person convening, and several informal discussions (see p. 14 for a full list of participants).

The principles that follow are also informed by research studies conducted by other advocacy partners and thought leaders. For instance, Jobs for the Future's Framework for a High-Quality Pre-Apprenticeship

Program¹ outlines key elements of any pre-apprenticeship program. Our principles expand existing research as well as the program elements of quality pre-apprenticeships set out by the Department of Labor.

Our policy research involved examining:

1. Program goals
2. Integrating successful apprenticeship practices
3. Program design, including equitable access, recruitment and placement
4. Compensation
5. Regional planning
6. Pathways to postsecondary education

Our process centered people who face the greatest barriers to employment—communities that have been historically marginalized or left behind in apprenticeship systems and the workforce development system as a whole. We sought to identify ways to best serve them and lift the obstacles they experience. We hope our findings ensure that industry and government do not recreate the inequities of the past, but instead advance a pre-apprenticeship system that meets the needs of every community.

High-quality pre-apprenticeships can ensure equitable access to apprenticeship opportunities

Apprenticeship systems are not immune to the systems of power that have embedded inequity in other training or employment pathways and society at large. In 1967, Cornell University published a study titled “Remedies for Discrimination in Apprenticeship Programs.”² The study described overwhelming resistance to gender and racial integration in apprenticeship programs in building, machinist, and printing trades. Researchers from Cornell and the University of Texas documented policies and practices that maintained almost total power among white men.

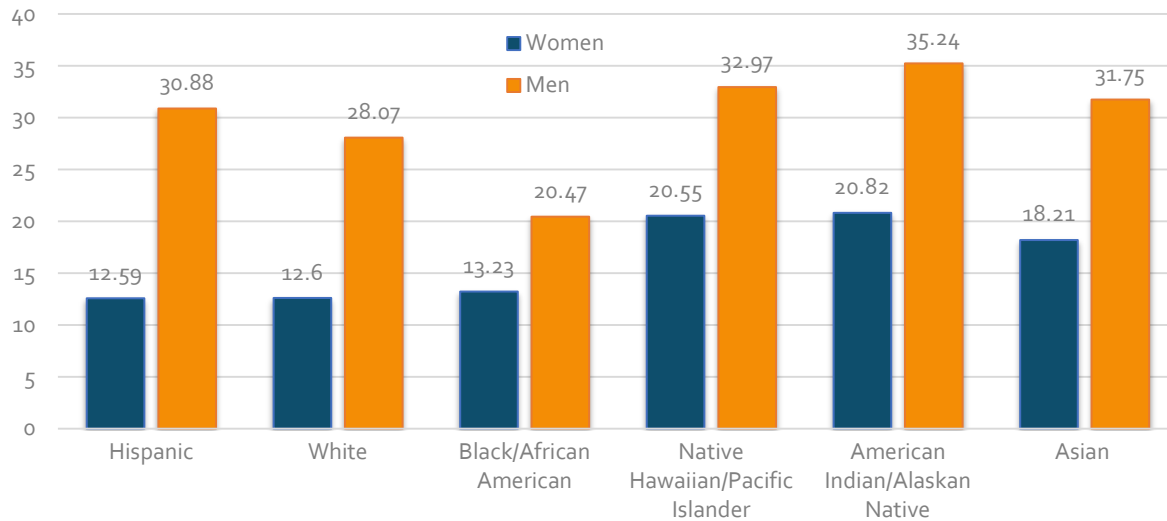
Today, outright discrimination in policy and practice remains in place. Systemic barriers to access and day-to-day effects of broader social inequity continue to prevent many people from participating in apprenticeships and earning the rewards of apprenticeable careers. Those who face the greatest hurdles include people of color, youth, people who are immigrants, people with disabilities, women, and others.³

Who participates in apprenticeship programs? And how do they fare?

As of 2017, 7.3% of apprentices nationwide were women – an increase of approximately 1% over the previous decade. However, wages for women remain much lower than for men. This is due in part to occupational differences: women are most likely to be enrolled in apprenticeships with lower pay scales. For example, the top occupation for female apprentices from 2008-2017 was childcare development specialist, where median wage for a journey person (someone who has completed an apprenticeship) was

only \$9.75/hour. In contrast, the top occupation for male apprentices was electrician, where median journeyman wage was \$23.46.⁴

Figure 1A: Apprenticeship Exit Wages by Race and Gender (2008-2017)



Source: This graph comes from the data, tables, and figures in Angela Hanks, Annie McGrew, and Daniella Zessoules, *The Apprenticeship and Participation Gap*, 2018.

Apprenticeship participation data by race is more difficult to assess given inconsistent and incomplete reporting by apprenticeship programs and apprentices themselves. Available data seems to suggest that participation rates for Black and Latinx apprentices are similar to their participation in the labor force as a whole.

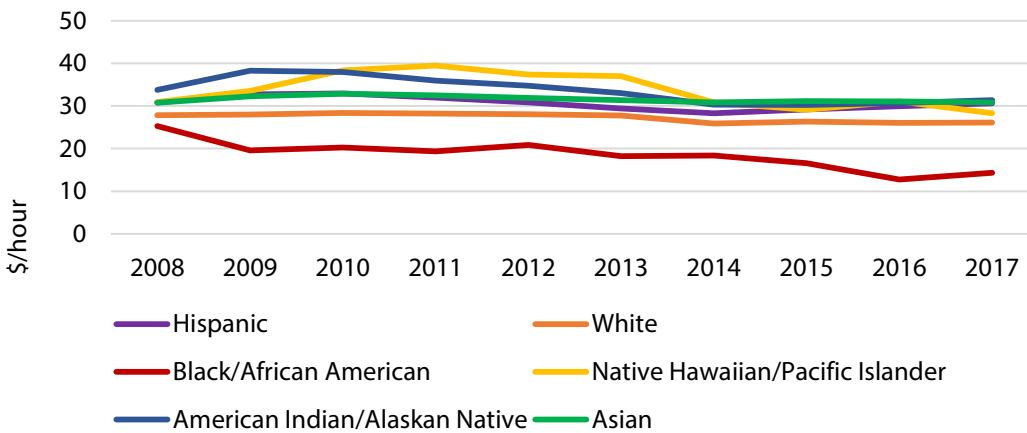
However, there are stark racial wage disparities among apprentices—gaps that are even greater when they are disaggregated by gender (see figures 1A and 1B). Some of these differences may be attributable to factors such as participation trends in various industries or regions of the country. But a closer look at data shows that wages have been consistently lower for Latinx women, compared to women from other races. Furthermore, Black apprentices receive lower wages than any other racial or ethnic group.

This is explained in part by our country’s continuing history of mass incarceration of African American people. Disproportionate numbers of African American apprentices are incarcerated. In fact, 25 percent of all **Black apprentices completed their apprenticeships** during incarceration. This suggests that African Americans have disproportionately low access to apprenticeships outside prison.

The quality and long-term outcomes of apprenticeships in prisons rarely match those of Registered Apprenticeships on the outside. Prisons and their employer partners are able to operate Registered Apprenticeships without offering the labor protections and minimum wages required for any other workers in the United States. For example, the median wage of incarcerated apprentices is 35 cents an hour. Apprenticeships in prisons are likely to be disrupted by transfers to other facilities or other

obstacles imposed by the prison system. In addition, since these apprentices work within the prison walls, they are rarely able to continue employment upon their release. Even for those who complete a Registered Apprenticeship while incarcerated, criminal records, probation/parole requirements, and other factors hamper their access to employment and wage growth when they come home.

Figure 1B: Racial Disparities in Apprenticeship Wages (2008-2017)



Source: These graphs come from the data, tables, and figures in Angela Hanks, Annie McGrew, and Daniella Zessoules, *The Apprenticeship and Participation Gap*, 2018.

What is a pre-apprenticeship?

At its most basic level, pre-apprenticeship is a preparatory experience that precedes participation in an apprenticeship. The U.S. Department of Labor defines pre-apprenticeship as “a program or set of strategies designed to prepare individuals to enter and succeed in a Registered Apprenticeship program and has a documented partnership with at least one, if not more, Registered Apprenticeship program(s).”⁵ **Unlike other kinds of career prep experiences, job readiness programs, or standalone trainings, a pre-apprenticeship is part of a larger apprenticeship system.**

Bipartisan support for apprenticeship models has indirectly raised the profile of pre-apprenticeship, yet this term is often used to describe a range of programs that stretches far beyond its definition. Further complicating matters, many erroneously use the terms “youth apprenticeship⁶” and “pre-apprenticeship” interchangeably. Fundamentally, a pre-apprenticeship is a preparatory experience that leads to participation in a Registered Apprenticeship, regardless of a worker’s age.

Principles to design high-quality, equitable pre-apprenticeships

One way to expand the participation of historically marginalized groups in Registered Apprenticeships is through high-quality pre-apprenticeships.

Pre-apprenticeships are not a panacea. But if they are done well – properly designed and funded – they can unlock pathways to careers and industries historically denied to many people of color, immigrants, and women. These career paths can lead to family-sustaining jobs with benefits and help low-income people move out of poverty.

The following principles serve as a guide to reaching that goal.

1. Beginning with the end in mind: Establishing program goals

It is vital to consider how any equity strategy interacts with the systems of power it functions within. This includes identifying whether barriers are structural, political, geographic, or financial. Pre-apprenticeship is one potential strategy that can be used to address a variety of barriers to equity in apprenticeship systems. It is important to ask: to what extent are these barriers inherent to the apprenticeship model, endemic in some apprenticeship systems, or imposed externally? Then the most appropriate program goals can be established.

Potential program goals for a pre-apprenticeship:

- *Increasing access to family-sustaining career paths for youth, low-wage workers, and adults who face barriers to employment*
- *Preparing potential apprentices to pass entrance exams*
- *Diversifying the workforce in an industry*
- *Improving apprenticeship retention and completion rates*
- *Providing wraparound supports for potential apprentices, such as child care, transportation, etc.*
- *Filling vacant apprenticeship slots*

Common stakeholder motivations:

- *Community demand for access to family-sustaining jobs with benefits*
- *Industry demand for talent*
- *Funder demand for workforce outcomes*
- *Employer demand for experienced candidates*

Opportunities to remove barriers within Registered Apprenticeships:

- *Encouraging Registered Apprenticeships to integrate support services for apprentices, such as*

childcare, transportation, equipment costs, and more

- *Pushing apprenticeship employers and sponsors to remove systemic barriers to access, such as unnecessary eligibility requirements*
- *Enacting oversight or accountability measures to correct policies or practices that contribute to inequitable outcomes*

2. Integrating successful apprenticeship practices

A high-quality pre-apprenticeship should have a registration system with appropriate quality standards.

When pre-apprenticeship is identified as an appropriate vehicle to prepare individuals with low incomes for high-quality employment, several principles should undergird policy and program models. Some of these principles may come from the practices that have made Registered Apprenticeships successful for so many people worldwide, and others may be from specific, proven pre-apprenticeships. One risk of low-quality pre-apprenticeships is that they merely water down the Registered Apprenticeship model, rather than providing a robust preparatory experience, including the knowledge, competencies, and supports pre-apprentices need to enter a Registered Apprenticeship or to succeed in the workforce.

Effective pre-apprenticeships should maintain the key elements that have made Registered Apprenticeships so successful⁷. These include:

- Registration systems with appropriate quality standards
- Guaranteed employment/career growth opportunities
- Common quality standards, with systems to monitor compliance
- On-the-job mentorship from experienced employees
- Integrated education and training, as well as access to postsecondary education
- Meaningful, nationally recognized portable credentials⁸
- Fair compensation
- Robust labor protections

3. Program design: Promoting equitable access, recruitment, and placement

Pre-apprenticeship programs should be developed and evaluated with a universal design approach that asks: who might be left behind? Why? What inclusive policy or practice can replace an exclusive one? The principles below include specific program components as well as equity and access protections to guide unions, employer sponsors, public or private funders, regulatory agencies, community-based organizations, and others seeking to develop, monitor, or support quality programs.

Recruitment strategies should support equity and access. They can include:

- Targeted outreach in communities with least access to opportunities for training or employment that leads to family-sustaining careers.
- Recruitment materials in multiple languages as appropriate.
- Clear communication of program requirements and realistic expectations of program outcomes.
- Pre-enrollment counseling to help potential pre-apprentices determine the program's fit with their goals, skills, and needs.
- Community-based organizations and labor unions actively committed to increasing the recruitment and participation of people of color, immigrants, and formerly incarcerated individuals.
- Sponsors ensuring pre-apprentices are placed appropriately to meet their unique career goals, including direct entry into a Registered Apprenticeship.

Eligibility and access models must work to break down barriers that preclude people of color, immigrants, and justice-impacted individuals from enrolling.

- Establish eligibility policies that do not limit enrollment based on factors such as pre-enrollment drug testing, history with the justice system, documentation or citizenship status, child support, or credit history.
 - When possible, assist pre-apprentices with resolving these issues (e.g., expungement, child support payment plans).
 - When industry or regulation creates insurmountable barriers to success, support individuals in finding realistic alternative paths or advocate for systemic change in law, regulation, or industry practices.
 - For example, a pre-apprenticeship participant with certain criminal charges may not be permitted to work with vulnerable populations, so they would need an alternative program.
 - On an institutional level, most Registered Apprenticeships are unable to hire those without documents/work authorization – a policy that needs to change.
- Provide for physically accessible facilities in convenient locations.
- Assist with securing child care, transportation, physical and mental health care, and other basic needs so participants can focus on training.
- Work with employer sponsors to ensure built-in flexibility for responsibilities such as probation or parole appointments, child care emergencies, etc.
- Ensure quality pre-apprenticeship programs are accessible to incarcerated individuals.

Pre-apprenticeships should offer wraparound services such as child care, transportation, physical and mental health care, equipment, and other basic needs.

Incarcerated individuals must have access to quality pre-apprenticeship programs that adapt to their unique circumstances and prioritize overcoming logistical challenges to completion.

Curricula should prepare pre-apprentices with the education, training, competencies, and awareness they need to enter Registered Apprenticeships.

- Incorporate integrated education and training to support concurrent development of academic, technical, and workplace skills.
- Support pre-apprentices in acquiring English language literacy skills by offering English as a Second Language instruction, directly or in partnership with a community-based organization or community college, when applicable.
- Support pre-apprentices in earning educational credentials by including preparation for GED, High School Equivalency Test (HiSET), National External Diploma Program (NEDP), and assessments requiring English language proficiency when applicable.⁹
- Use teaching and testing materials written in plain language (and offered in multiple languages, as appropriate).
- Include broad industry awareness, such as information on related fields, transferrable skills, portable credentials, and opportunities for advancement, including pathways to management/leadership roles and/or entrepreneurship.
- Directly address industry and workplace culture, employee rights and responsibilities, training for self-advocacy, and resources for post-placement support.

Cohort-based models can provide community support and help pre-apprentices expand their social networks.

- Create cohorts of pre-apprentices to build vital social capital, and help pre-apprentices build relationships among peers, as they become enduring community support and professional development networks.
 - Programs can still integrate some elements of cohort models even when an industry cannot fully adopt the model.
 - Cross-industry networks, long-term mentorship, and continued retention supports can ensure peer support and meet some of the same needs.

Support career exploration:

- Pre-apprenticeships can provide exposure to multiple career options, especially for young adults still discovering their talents and interests and for adults entering a new field.¹⁰
 - If difficulties securing employer buy-in for exploratory activities emerge, joint pre-

apprenticeship programs that provide paid, hands-on work experience in several areas can be a solution.

Promote placement in Registered Apprenticeships. Pre-apprenticeships should ensure:

- Guaranteed acceptance into Registered Apprenticeships (known as direct entry agreements). This is ideal to ensure that the pre-apprenticeship is worth the time and resources of both pre-apprentices and program operators. To this end, the federal government must require that pre-apprenticeship programs be registered.
 - In circumstances where direct entry cannot be guaranteed, the Registered Apprenticeship should commit to priority hiring of pre-apprentices.
- Meaningful, personalized case management/career navigation services continue well into the Registered Apprenticeship.
- Wraparound supports, such as child care or transportation, continue until an apprentice has sufficient resources to manage those needs themselves.
- Coaching for employer sponsors and supervisors/mentors, so they can build more welcoming, responsive, culturally competent and inclusive workplaces.

4. Boosting quality pre-apprenticeships by ensuring fair compensation

One of the most important elements of a successful pre-apprenticeship is its direct path to a Registered Apprenticeship, for which participants are paid. This relationship is vital to ensuring that people who participate in pre-apprenticeships find meaningful opportunities to successfully advance their careers.

In Registered Apprenticeships, participants are employees of the apprenticeship sponsors. They are paid for their work with salaries that increase along with their skills and experience. Some apprenticeship sponsors also treat pre-apprentices as employees, with salary scales commensurate with their progress in the program. These pre-apprentices are valued as entry-level workers who are paid from the beginning and move seamlessly into apprentice and journeyman roles.

Although this degree of integration may not always be possible, pre-apprenticeships must always compensate participants. Very few people can afford to dedicate weeks or months to pre-apprenticeship training without income to support themselves and their families. Unpaid training experiences exclude people without other sources of funds. **Pay is a necessity for an equitable system.**

Career exploration: It is important to note that pre-apprentices are not well-served by employment relationships for which they are not yet ready or committed; likewise, employers are unlikely to invest in people who are not committed to serve as employees well into the future. To avoid locking people into a single career track that hasn't been fully explored, pre-apprenticeships (especially those targeting young people) can provide exposure and basic skills that are transferrable to other careers.

Programs with this exploratory bent can find creative ways to compensate participants while still providing

support for those who decide to pursue a different path. For example:

- Groups of industry employers can sponsor paid pre-apprenticeships that prepare workers with the basics to pursue a range of careers, with commitments to hire successful graduates into one of several Registered Apprenticeship programs.
- Federal and state-funded workforce training programs can make compensation an allowable use of funds.

Although this seamless integration may not always be possible, pre-apprenticeships must always compensate participants.

5. Incorporating pre-apprenticeships into regional planning

Many players are involved in developing and implementing a community economic development strategy, including city or county governments, workforce boards, community colleges, and others.

The following principles can guide policymakers and practitioners in integrating pre-apprenticeship planning into those efforts:

- Involve people who have been shut out from apprenticeship and pre-apprenticeship opportunities in leadership, policy, and program design decisions.
- Ensure that all pre-apprenticeships link directly to Registered Apprenticeships that pay living wages (with benefits) and are structured to support career advancement in both income and skills development.
- Incentivize pre-apprenticeship development in partnership with Registered Apprenticeships that commit to equitable practices and demonstrate results.
- Provide support for a range of pre-apprenticeship options, including but not limited to traditional apprenticeship trades. Joint apprenticeship councils, employer sponsors, or other groups can create pre-apprenticeship programs that introduce participants to careers in their industries.
- When developing Registered Apprenticeship systems in new industries, support partnerships that integrate elements of pre-apprenticeship directly into the early stages of the apprenticeship itself. For example, weaving in targeted recruitment and wraparound supports could minimize (or even end) the need for pre-apprenticeship programs.
- Develop equity standards for Registered Apprenticeships and employer sponsors. Such standards can be based on company policies and practices, as well as monitoring of disaggregated data on hiring, firing, retention, promotion, discipline, and other indicators of workplace climate and labor-management relations.
- Require transparency in outcomes, including entry and retention in Registered Apprenticeships and subsequent employment.

6. Ensuring high-quality pre-apprenticeships lead to appropriate postsecondary opportunities

A high-quality pre-apprenticeship must ensure participants understand and can take advantage of the unique educational opportunities offered through Registered Apprenticeship models. Along with



classroom instruction, Registered Apprentices can earn while they learn and acquire an industry-recognized, national credential without accumulating student loan debt. Pre-apprenticeship programs can share information and provide access to Registered Apprenticeships that offer college credits (or even a college degree) at the employer's expense. Siemens, for example, offers a Registered Apprenticeship that incorporates an associate degree and pays for the full cost of tuition.

To support participants' continued career or educational goals, successful program models should:

- Encourage and expose pre-apprentices to postsecondary opportunities, including dual enrollment and Registered Apprenticeship programs, which allow them to earn college credits or a college degree.
- Create direct entry agreements for pre-apprenticeship graduates to enter a two-year or four-year institution.
- For pre-apprentices who decide to no longer pursue a Registered Apprenticeship, pre-apprenticeship programs should connect them to two-year and four-year institutions. Doing so can bolster their exposure to various postsecondary pathways. This includes sharing information regarding open-access institutions, admissions and financial aid.

Opportunities to advance pre-apprenticeships with federal investments and policy

Dedicated funding streams to support high-quality pre-apprenticeships can help to maintain their long-term sustainability. Quite often, sponsors find themselves braiding together funding from various sources to support pre-apprenticeship programs and may be concerned about their sustainability.

Federal policymakers can expand sustainable, successful pre-apprenticeships by adhering to the following principles or meeting related goals:

- **Authorize dedicated funding streams to support and expand high-quality pre-apprenticeships.**

For example, lawmakers can build on the Workforce Innovation and Opportunity Act (WIOA). Currently, this law allows Title I funds to be used for pre-apprenticeships that are connected to a Registered Apprenticeship, demonstrate a "strong record of enrolling their pre-apprenticeship graduates into a Registered Apprenticeship program,"¹¹ and are approved for the Eligible Training Provider Lists. Title I of WIOA requires Local Workforce Development Boards to spend 20% of youth training dollars on work experience, which can include pre-apprenticeships.

While these policies are a start, pre-apprenticeships require dedicated funding streams in order to be successful in the long-term. As it is, workforce development training programs authorized under WIOA continue to be grossly underfunded.

- **High-quality pre-apprenticeship sponsors must be informed about federal policies that discourage people with low incomes from participating in pre-apprenticeships.** With regard to Supplemental Nutrition Assistance Program Education and Training (SNAP E&T)¹² recipients and HUD FAP Section 3¹³ residents in particular, it is important to address the challenges of the public benefits cliff, whereby income earned from pre-apprenticeships may make participants ineligible for public benefits but not provide enough to sustain a household. Waiver agreements between pre-apprenticeship programs and Income Maintenance Administrations or Public Housing Authorities may be able to minimize the cliff effect.

Conclusion

High-quality pre-apprenticeships can be one useful tool to advance economic justice for historically marginalized youth and adults. As Congress seeks to reauthorize the National Apprenticeship Act and WIOA, it must center the voices of people of color, women, immigrants, and justice-impacted youth and adults as well as others who have been denied access into the nation's Registered Apprenticeship programs.

Registered Apprenticeships are a proven workforce development strategy. They have demonstrated the strongest employment outcomes and economic gains for workers in the United States and in other parts of the world. Congress has an opportunity to correct some of the wrongs of the past by expanding greater access to Registered Apprenticeships and other paths to high-quality employment for people with low incomes, people of color, women and other historically marginalized groups. Doing so would advance an effective approach to help individuals and their families move out of poverty.

As Congress, employers, states, the federal government, program sponsors, and other community stakeholders look to strengthen pre-apprenticeships, we urge them to design and invest in high-quality pre-apprenticeship programs with these principles in mind.



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Endnotes

¹ *JFF'S Framework for a High-Quality Pre-Apprenticeship Program*, JFF Center for Apprenticeship and Work-Based Learning, 2019. https://center4apprenticeship.jff.org/apprenticeship/pre-apprenticeship/?utm_source=webex&utm_medium=webinar&utm_campaign=paw

² F. Ray Marshall and Vernon Briggs Jr., *Remedies for Discrimination in Apprenticeship Programs*, Cornell University ILR School, 1967. <http://digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1134&context=articles>

³ Oftentimes, communities of color can be funneled towards certain kinds of apprenticeships with limited opportunities for growth and earning potential. An equitable pre-apprenticeship should gauge whether a particular student is better suited for a postsecondary opportunity or an apprenticeship opportunity. When determining the latter, officials should intentionally consider a wide range of both traditional and non-traditional pathways, including those in emerging sectors, such as healthcare, information technology, and other STEM fields.

⁴ Angela Hanks, Annie McGrew, and Daniella Zessoules, *The Apprenticeship Wage and Participation Gap*, Center for American Progress, 2018.

<https://cdn.americanprogress.org/content/uploads/2018/07/10122156/ApprenticeshipWageGap-brief1.pdf>.

Figures 1A and 1B are also adapted from this paper.

⁵ Training and Employment Notice No. 13-12 of November 30, 2012, Defining a Quality Pre-Apprenticeship Program and Related Tools and Resources, https://wdr.doleta.gov/directives/attach/TEN/TEN_13-12.pdf.

⁶ "Youth apprenticeship" refers specifically to apprenticeships that are designed for students to begin while they are in high school. The Partnership to Advance Youth Apprenticeship (PAYA) outlines principles of quality youth apprenticeship, which can be found here: <https://www.newamerica.org/education-policy/partnership-advance-youth-apprenticeship/about/our-principles/>

⁷ Training and Employment Guidance Letter WIOA No. 13-16 of January 12, 2017, Operating Guidance for the Workforce Innovation and Opportunity Act, Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA), https://wdr.doleta.gov/directives/attach/TEGL/TEGL_13-16.pdf.

⁸ National portable credentials are trusted by employers and educational institutions. Every graduate of a Registered Apprenticeship program receives a nationally-recognized credential, referred to as a Certificate of Completion, which is issued by the U.S. Department of Labor (USDOL) or a federally recognized state apprenticeship agency. This portable credential signifies that the apprentice is fully qualified to successfully perform an occupation.

See TEGL 13-16.

⁹ These programs may not be feasible or appropriate for some pre-apprenticeships. For example, some short-term programs may not provide enough time for students to even register and sit for exams, let alone gain academic, language, or test-taking skills sufficient enough to boost scores. However, employers and sponsors can develop partnerships with local providers, such as Adult High Schools, community-based organizations, and community colleges – entities that offer these educational services, often at a relatively low cost or for free.

¹⁰ Members of communities that have been shut out or underrepresented in an industry may have minimal familiarity with related career paths that others with family history or community proximity may take for granted.

¹¹ TEGL 13-16.

¹² Food and Nutrition Service, "SNAP Work Requirements," U.S. Department of Agriculture, May 29, 2019,

<https://www.fns.usda.gov/snap/work-requirements>.

¹³ Congress established the Section 3 policy to guarantee that the employment and other economic opportunities created by Federal financial assistance for housing and community development programs should, if possible, be directed toward low- and very-low income persons, particularly those who are recipients of government assistance for housing. Section 3 residents are public housing residents and low and very-low income persons who live in the metropolitan area or non-metropolitan county where a HUD-assisted project for housing or community development is located. https://www.hud.gov/program_offices/fair_housing_equal_opp/section3/section3brochure