



NATIONAL SKILLS COALITION
Every worker. Every industry. A strong economy.

Charting the Right Course on Apprenticeship: Returning to a Focus on Quality

- **Office of Apprenticeship (OA) should halt all work on Industry-Recognized Apprenticeship (IRAP), refocusing instead on expanding pathways of work-based learning and registered apprenticeships for all workers, especially those who have been historically excluded from these pathways, and for more businesses in more industries.**
- **Department of Labor’s Employment and Training Administration should work with OA to ensure pathways to alternative forms of high-quality work-based learning, including pre-apprenticeship and other pathways that include earning credentials and wages, are available to all workers, especially those on our safety net programs and those most impacted by the current economic and health crisis.**

Our country faces the most devastating economic crisis since the Great Depression and the Department of Labor’s strategy in the coming months and days will have a significant impact on the lives of workers and businesses across the country.

Skills training and apprenticeships alone cannot address the challenges workers and businesses face right now. But programs under the Department of Labor’s jurisdiction can have a meaningful impact on the lives of millions of U.S. workers by helping them reskill, succeed in training, and fill open positions with companies in their communities. Skills are critical to the Department of Labor’s role in driving the country towards an inclusive economic recovery.¹

Apprenticeship programs are a “win-win” — workers earn wages while learning new skills and businesses can customize training to their workforce needs. For companies in desperate need of new workers, these programs immediately place motivated hires on-site. Because businesses are directly involved in onsite and classroom learning, they can align training with the skills they need at any moment and adjust training quickly as their workforce needs change. The approach has been shown to reinforce employee engagement, leading to better morale, higher retention and lower turnover.²

During the Obama Administration, the Department of Labor launched the American Apprenticeship Initiative and ApprenticeshipUSA,³ which supported grants to states to engage in innovative practices to expand apprenticeship. The Obama Administration also launched contracts with national organizations, including the National Urban League and organizations

serving women and people with disabilities, to help facilitate technical assistance to states and apprenticeship programs on improving equity within them.

While purportedly continuing a focus on apprenticeship, the Trump Administration continued some of the Obama Administration's work but also took several administrative actions that harmed the progress made under the prior administration.

To effectively continue momentum around expanding apprenticeship, especially as a strategy to open doors to good jobs for workers to whom they have previously been inaccessible, the Biden Administration should take the following steps to move *Apprenticeship Forward*:¹

- **Rescind harmful Executive Action from the Trump Administration.** The White House should rescind Executive Order 13245, Expanding Apprenticeships in America. The Trump Administration focused on creating a new Industry Recognized Apprenticeship system at the detriment and expense of all other workforce programs, calling for all available funding to be directed towards the new system. Multiple Executive Orders,⁴ including EO 13245 and EO 13845, directed agencies to cut expenditures on workforce and education programs that help workers who most need access to succeed in skills programs. The Apprenticeship Task Force, convened by the Secretaries of Commerce, Education, and Labor, issued a recommendation to cut funding to workforce programs to fund IRAP programs. Both the 2018⁵ and 2019⁶ Presidential Budget Requests from the Trump Administration proposed moderate increases in funding for apprenticeship, coupled with proposals to significantly cut workforce funding for other programs. Overall, these efforts lacked necessary alignment between our public workforce and apprenticeship system. The Trump Administration perpetuated a narrative that apprenticeship – particularly their IRAP system – should exist outside of and in place of our public workforce system, which negates the important contribution the workforce system has played over the past decade to expanding apprenticeship.⁷ The Secretary should work with the White House to rescind these Executive Orders and instead focus on modernizing workforce programs.
- **Halt all efforts to create Industry Recognized Apprenticeship.** The Department should reabsorb all Office of Apprenticeship staff and resources into those efforts that expand registered apprenticeship. The Department should rescind all guidance and all Training and Employment Guidance Letters related to IRAP programs and reissue guidance affirming a commitment to registered programs.

The Trump Administration's stated goal in creating a new IRAP system was to address perceived challenges with registered apprenticeship. When evaluated next to the standards to which DOL holds registered programs, IRAPs are provided

¹ <https://www.nationalskillscoalition.org/resources/publications/file/Definition-and-Principles-for-Expanding-Quality-Apprenticeship-in-the-U.S..pdf>

significant flexibility in program structure, wage progression, oversight, and interaction with the public workforce system that seem counterproductive to protecting workers or meeting industry demand.⁹ Additionally, the system fails to address existing challenges, creating, instead, unnecessary confusion for workers, businesses, and communities. Any changes to an established system should be to better serve those stakeholders who rely on it, and IRAP failed to do so. Instead, it created more difficulty for states and training programs by reducing opportunities for alignment at the local level and removing state autonomy from regulating programs within their borders. The program also provided inconsistent measures of quality, meaning workers and businesses could be faced with an imprecise picture of the training programs' effectiveness. Finally, the Trump Administration failed to apply equal employment opportunity standards to IRAP that address discriminatory impacts of recruitment, selection, hiring, and retention policies within apprenticeship programs. These regulations, last updated under the Obama Administration in 2016, are critical to expanding apprenticeship in an equitably and effectively.¹⁰

- **Issue guidance on the importance of work-based learning programs outside of registered apprenticeship programs, where appropriate for workers and industries.** Registered apprenticeship is a high-quality training model that aligns business demand and worker need. Not all workers, however, have had access to the skills or qualifications to meet rigorous application standards for apprenticeship programs. Businesses provide a spectrum of quality work-based learning opportunities that do not rise to the rigor or depth of training encompassed in an apprenticeship program. The Department of Labor should issue guidance on quality work-based learning programs that help workers gain credentials and skills that lead to career progression. This guidance should include specific information on aligning work-based learning opportunities with the needs of workers – or potential workers – who are also beneficiaries of public benefit programs like TANF and SNAP. This will require working with the Departments of Health and Human Services and Agriculture to ensure administrative restrictions under those agencies' jurisdiction maximize access to work-based learning of all kinds, including registered apprenticeship and pre-apprenticeship.
- **Work with Congress to modernize registered apprenticeship to meet worker and business needs.** The existing registered apprenticeship system has not been significantly updated in more than eighty years. Congress has, over the past five years, however, increasingly appropriated funding intended to expand apprenticeship into new industries and for new workers. The Biden Administration should work with Congress to support legislation, consistent with the work of the [Apprenticeship Forward Collaborative](#), that builds on successful practices in states and communities, meet industry demand and worker need, and protects the health, safety, and wellbeing of apprentices and mentors.

The American public supports these changes

In national polling conducted prior to the pandemic, 88 percent of voters and 63 percent of business leaders wanted increased public funding to expand apprenticeship.

Any Biden Administration focus on apprenticeship should include a return to basics – ensure that workers’ needs are addressed and that programs are meeting industry needs.

For further information regarding these recommendations, please contact Katie Spiker, National Skills Coalition’s Director of Government Affairs, at katies@nationalskillscoalition.org.