



Apprenticeship Programs and Workforce Needs

Background

In July 2015, the program review committee authorized a study of Connecticut's registered apprenticeship system. The study was to examine the scope of the system and how well apprenticeship is promoted. Finally, the project was to include an update of certain information from a 2009 PRI study on workforce supply and demand.

The Connecticut Department of Labor (CT DOL) Office of Apprenticeship Training administers the state's apprenticeship system. The office establishes standards for apprenticeship, oversees apprenticeship participants through a registration process, and promotes apprenticeship. In fiscal year 2015, the office had 10 staff and expenditures of about \$1.05 million. As of June 2015, there were 5,215 apprentices and 1,582 on-the-job training (OJT) organizations participating. The office is advised by the State Apprenticeship Council.

Apprenticeship involves two components: paid OJT and coursework. On-the-job training is overseen by sponsors, who are employers and, for union workers, labor-management partnerships. Coursework is provided by a variety of organizations. Apprenticeship lasts between one and six years. For many licensed occupations, apprenticeship requirements must be finished before the licensure exam can be taken.

To complete this study, program review committee staff: interviewed CT DOL personnel; obtained information from original surveys of and conversations with apprentices, sponsors, coursework providers, and other states' apprenticeship directors; communicated with other state agencies' staff and U.S. Department of Labor apprenticeship personnel; toured a few labor-management partnership training facilities; observed a State Apprenticeship Council Meeting; and analyzed data from multiple state agencies.

Main Staff Findings

The apprenticeship office has focused on in-person meetings with new apprentices and sponsors, with little attention to high-level oversight. In-person, on-site meetings take up substantial office resources and are not done by any of the four nearby states examined in-depth (including states with federally-administered apprenticeship systems). Comprehensive oversight of sponsor quality is required by federal regulation, but is not systematically conducted by the office. The office's data system does not provide data that would assist in program management, and it does not allow for online apprenticeship registration. In addition, the office has not consistently monitored coursework quality. A current review of coursework quality has been riddled with problems.

The office has promoted apprenticeship, and additional steps could be taken. The office successfully applied for a major federal grant to assist in promotion, totaling \$5 million over five years, and is partnering with the Manufacturing Innovation Fund to offer qualified manufacturing companies up to \$7.8 million in apprenticeship incentives. Both efforts will expand apprenticeship. Promotion efforts may be hampered by reliance mainly on the completion of a set number of OJT hours, an inadequate website (which is highly inaccurate and incomplete in some cases), and the fact that the Department of Consumer Protection (DCP) administers a "trainee" program similar to apprenticeship for some occupations, among other features.

An undetermined number of workers are not properly registered as apprentices, which is problematic, perhaps due in part to deficiencies in apprenticeship administration and coordination. Apprentices who are not registered might not get the benefits of increasing wages (required in apprenticeship) and, for licensed trades, do not get any hours credited toward apprenticeship completion (i.e., licensure eligibility). The annual registration renewal process, which is required, does not involve apprentices until sponsors fail to renew registration. In addition, there does not appear to be strong communication with DCP when either state agency discovers workers are not registered. About 28 percent of apprentices who responded to an original PRI survey reported previously working in a licensed occupation without being a registered apprentice (or licensed).

PRI Staff Recommendations

Numerous recommendations are proposed to strengthen the apprenticeship office's oversight of sponsors and coursework providers, as well as add to apprenticeship promotion efforts. Key recommendations would:

1. **Shift office activities to focus on sponsor compliance**, which would be made possible by moving to the free federal data system;
2. **Further apprenticeship promotion** by expanding apprenticeship into different models and overhauling the website;
3. **Stop the coursework provider review underway and replace it** with a new system for setting and monitoring coursework standards; and
4. **Improve coordination with DCP** regarding licensure enforcement and training for licensed occupations.

Acronyms

CSDE	Connecticut State Department of Education
CT DOL	Connecticut Department of Labor
DCP	(Connecticut) Department of Consumer Protection
DECD	(Connecticut) Department of Economic and Community Development
PRI	Program Review and Investigations (Committee)
RAPIDS	Registered Apprenticeship Partners Information Data System, a federal data system accessible for free to all apprenticeship offices, whether state- or federally-run
U.S. DOL	United States Department of Labor

LIST OF PROGRAM REVIEW COMMITTEE STAFF RECOMMENDATIONS

APPRENTICESHIP ADMINISTRATION

- 1. The Connecticut Department of Labor's apprenticeship office should discontinue in-person registration for new apprentices and dedicate substantial staff time to sponsor monitoring.**
 - a) Upon apprentice registration, materials should be mailed to each new apprentice that include the "Apprentice Handbook & Progress Report" along with an easy-to-understand one-page explanation of apprentice and sponsor responsibilities. If an apprentice switches sponsors, just the one-page explanation should be mailed to the apprentice, reminding him or her of each party's responsibilities.**
 - b) The state labor department should establish a rotating schedule, along with a plan, to monitor sponsor compliance with federal and state laws and regulations. In addition to the annual review required for new sponsors by the federal government, each sponsor should be reviewed every five years per federal regulation.**
 - c) Either the U.S. Department of Labor apprenticeship office's quality assurance form or a common form developed by the Connecticut labor department should be used for each sponsor. Data from the form should be collected and aggregated so the department can track problem areas across sponsors. During an on-site compliance review, the Connecticut labor department should check on the Apprentice Handbooks of those apprentices who are on premises to make sure the handbooks' logs of on-the-job training hours are being kept up-to-date and signed, apprentices are being rotated in different work tasks, and coursework progress is being made. Connecticut labor department staff should also check on recent apprentice wages to ensure the wage progression schedule is being followed.**
 - d) Every sponsor identified by a review as seriously out of compliance (as defined by the department) shall be subject to random visits by field staff to ensure the sponsor has implemented any recommendation that was determined to be needed at the time of the review.**
 - e) Beyond routine monitoring, Connecticut labor department staff should focus on those sponsors that continually fail to register new apprentices within the federally required 45 days of hiring. A special effort should be made to contact apprentices who are employed by those sponsors to remind them of the consequences of no registration (i.e., no credit earned towards hours needed for completion of apprenticeship).**

- f) **The results of any compliance review conducted by the Connecticut labor department should be accessible and linked to the sponsor list that is maintained online.**
- 2. The Connecticut Department of Labor should transition to the U.S. Department of Labor apprenticeship data system. The Connecticut labor department should discuss with the federal labor department the details of transferring to the federal data system RAPIDS 2.0 in summer 2016, including timeframes for the transfer, the data to be transferred, and staff training.**
- 3. The Connecticut Department of Labor should revamp its apprenticeship website with clear and comprehensive information for potential and current apprentices, sponsors, and coursework providers. The website should be regularly updated and include links to appropriate sources of information, such as all approved coursework providers' websites.**

APPRENTICESHIP PROMOTION

- 4. The Connecticut Department of Labor should consider contacting potential sponsors involved in occupations that have apprentices in nearby states but not in Connecticut, to learn whether there is interest in launching those apprenticeships here. Even if sponsors are interested, when determining whether an occupation might be appropriate for apprenticeship in Connecticut, the apprenticeship office should take into consideration existing training options and wages, and how apprenticeship might alter those.**
- 5. The Connecticut Department of Labor should offer sponsors at least two of the three models of apprenticeship in the ten licensed and ten unlicensed occupations with the most apprentices by July 1, 2018.**
 - a) **For each occupation, the apprenticeship office should convene industry groups including at least six sponsors (three each from union-contracting companies and other companies) and, for licensed occupations, members of the relevant licensing board, to recommend sample apprenticeship on-the-job training requirements for each of (at least) two of the three possible models (time-based, competency-based, and hybrid). The State Apprenticeship Council should review the industry groups' samples and the apprenticeship office should approve them, or approve with revisions.**
 - b) **The Connecticut labor department and the Department of Consumer Protection should review statutes and regulations to determine whether any revisions are necessary to comply with federal regulation allowing all three types of models. If so, the department(s) should pursue the necessary changes.**

WORK ISSUES: ON-THE-JOB TRAINING

6. The CT Department of Labor should change the apprenticeship registration renewal process in the following ways:

- a) Apprentices and sponsors should both be reminded multiple times before and after the renewal fee due date.**
- b) The office should use its computer system to e-mail pre-due date reminders to those apprentices and sponsors with e-mail addresses on file.**
- c) After the fee due date, the office should call both apprentices and sponsors before a deregistration notice is sent by mail and e-mail.**
- d) The renewal form from the apprentice should be revised to include:**
 - the apprentice's on-the-job training hours earned, in total, at the point of submission;**
 - a note on the apprentice's progress or status regarding coursework; and**
 - dated signatures from both the apprentice and a sponsor representative attesting to the information's accuracy.**

In addition, the apprentice renewal form should instruct the apprentice to make a copy of the form and keep it until the person has fulfilled all requirements of apprenticeship and, if applicable, become licensed.

7. The CT Department of Labor should amend its regulations to include: a) the process to be used by sponsors to request apprentice-to-journeyperson ratio relief. The department also should post, on its website, a list identifying the sponsors that have received ratio relief, along with the number of apprentices and journeypersons the sponsor was allowed.

COURSEWORK

8. The Connecticut Department of Labor should immediately suspend its evaluation of apprenticeship coursework providers and notify them of the suspension. The department should then take the following steps to develop and implement apprenticeship coursework standards:

- a) Give administrative and technical assistance to the licensing boards, each of which should propose coursework standards for every license under its jurisdiction by July 1, 2017. The coursework standards should reflect current practices and knowledge needed for each occupation, including knowledge tested on occupational licensing exams. As part of the standards proposal, the licensing board also should determine whether any curriculum developed by a national industry association or a national accrediting body is acceptable in lieu of the coursework standards. In**

- formulating each proposal, the licensing boards should seek comments and suggestions from all coursework providers who had been previously approved by the labor department as apprenticeship coursework providers.
- b) Deliver the licensing board proposals to the State Apprenticeship Council for the council's review and suggested revisions, by August 1, 2017. The council should examine the proposals, receive public comment on them, and give suggested revisions to the labor department by December 1, 2017.
 - c) Determine the coursework standards and publish them on the labor department's website by December 31, 2017.
 - d) Use the new standards to evaluate organizations that apply to become new coursework providers, or approved coursework providers that apply for approval to offer coursework in an occupation for which approval was not originally granted.
 - e) Set a schedule and clear process for reviewing approved coursework provider quality on a routine basis, by December 31, 2017.
 - f) Set a schedule for regularly updating the coursework standards at least every five years. The update process should be the same as the process outlined above for developing the standards.
9. The Connecticut Department of Labor, Charter Oak State College, the Department of Consumer Protection, and the licensing boards should discuss what resources would be needed to undergo an assessment that could result in making academic credit available to license holders in apprentice occupations. The groups should then consider whether to move forward with assessment(s).

INTERAGENCY COORDINATION: DEPARTMENTS OF LABOR AND CONSUMER PROTECTION

10. The Connecticut Department of Labor should offer apprenticeships in all licensed trainee occupations that meet the minimum on-the-job training and coursework requirements for apprenticeships, by July 1, 2017. The department should conduct outreach to encourage employers to become sponsors in those occupations.

The labor department should consider handling all trainee registration and related matters for licensed occupations that require training but do not meet the requirements of registered apprenticeship. The department should consider a standalone, minimally-staffed trainee office that coordinates closely with the apprenticeship office.

11. The Department of Consumer Protection should revise its website so that each trainee occupation or trainee occupational field's webpage links to the trainee registration application and to clear standards for the specific trainee program.

12. Every few years, the Connecticut Department of Labor should examine occupational exam results by apprenticeship coursework provider and licensure data by occupation and sponsor. The resulting information should be used to assist coursework providers and sponsors in improving the quality of apprentice training.

13. The Connecticut Department of Labor should clarify how long sponsors have to register a new employee as an apprentice and should consider the 45-day window that is allowed under federal regulation.

14. The Connecticut Department of Labor and the Department of Consumer Protection should take the following steps regarding occupational licensure enforcement:

- a) Any enforcement action taken by the Department of Consumer Protection against an employer involving the use of employees performing work that requires apprentice registration or occupational licensure should be forwarded to the Connecticut Department of Labor, apprenticeship office on a monthly basis.**
- b) The apprenticeship office should check its data system to determine if the worker was ever registered as an apprentice and/or if the employer was ever an approved sponsor. If so, the office should contact the sponsor to determine the reason(s) the sponsor did not register the employee as an apprentice. If the worker was ever registered as an apprentice, the apprentice should be mailed a reminder notice that he or she is not considered a registered apprentice and therefore will not receive credit towards apprenticeship completion until registered.**
- c) In addition, the state labor department, Wage and Workplace Standards Division should send a monthly report to DCP and the apprenticeship office delineating any violations that division has identified and found valid for those transgressions that involve workers without proper credentials.**