

# Expanding Apprenticeship for Those Who Need It Most: Recommendations of the National Youth Employment Coalition

*Adopted by NYEC's Policy Committee, February 2024*



Apprenticeship is a proven model for helping young people gain skills and a sturdy connection to the labor force and economic self-sufficiency. Unfortunately, too few young people benefit from apprenticeship. The [average age of new apprentices is 29](#). According to [2021 DOL data](#), in the 42 states and programs that report data to the federal government, in that year only 538 apprentices were age 16 when they registered, and only 1,820 were age 17.

The National Youth Employment Coalition has prepared the following recommendations as Congress considers legislation related to apprenticeship. NYEC is an association of more than 120 organizations that work to connect young people to education and employment, including community-based organizations, workforce development boards and other intermediaries, municipal and state workforce agencies, and national nonprofits. Throughout 2023 NYEC convened an Apprenticeship Subgroup of its Policy Committee, made up of workforce-development practitioners and leaders who are working to expand apprenticeship. These recommendations reflect their experiences and expertise. See the appendix for a complete list of contributors.

## Summary of Recommendations

- **Defining Pre-Apprenticeship:** Codify existing DOL regulations related to pre-apprenticeship.
- **Defining Youth Apprenticeship:** Youth apprenticeship should be registered in accordance with the National Apprenticeship Act, and aligned with Workforce Innovation and Opportunity Act (WIOA) terms and concepts.
- **Defining Youth Apprentices:** Youth apprentices should be defined as any young person aged 16-24. All young people should have access to youth apprenticeship. If further narrowing is needed, young people who are out of school and out of work (Opportunity Youth) or the WIOA-defined Out-of-School Youth population should be prioritized.



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- **Eligible Training Providers for Youth Apprenticeship Programs:** We recommend an expansive definition of what types of entities can provide related training and instruction, including community-based organizations.
- **Expanding Youth Apprenticeship:** Rather than fluctuating year-to-year federal appropriations, Congress should create a permanent, formula-funded program so that apprenticeship can grow steadily and nationwide.
- **Connection to WIOA Reauthorization:** WIOA already encourages participation in work experiences for young people and provides supportive services to ensure young people can complete programs. These provisions should be aligned with any new apprenticeship legislation, and local workforce development boards should seek to incorporate apprenticeship programs into their service ecosystem. New resources for apprenticeship should not be an excuse to cut already-threadbare appropriations for WIOA programming.

## Defining Pre-Apprenticeship

The primary goal of any pre-apprenticeship program is to address barriers to successfully completing an apprenticeship. In addition to ensuring that participants possess sufficient literacy and numeracy skills, pre-apprenticeships often address employability or “soft” skills. As apprenticeship models expand into new sectors, these employability skills will become increasingly prominent in pre-apprenticeship models. Pre-apprenticeships may also mirror the structured nature of apprenticeships, preparing participants to learn by doing and to receive instruction from experienced professionals in a mix of academic and non-academic settings.

We recommend that legislation codify existing DOL regulations that define pre-apprenticeship, at 20 CFR 681.480. These regulations define a pre-apprenticeship as a program that includes the following elements:

- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region [in which the program is offered];
- Access to educational and career counseling and other supportive services [as defined in WIOA], directly or indirectly;
- Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through coursework can be applied toward a future career;
- Opportunities to attain at least one industry-recognized credential; and
- A partnership with one or more Registered Apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program into a Registered Apprenticeship program.

The Department of Labor should study and make recommendations regarding the creation of “registered pre-apprenticeship” programs or a similar vehicle to recognize and promote high-quality pre-apprenticeships.

*"To enhance outcomes for young apprentices and ensure effective service delivery across training providers throughout the country, it is essential to secure Congressional approval for a permanent, formula-funded apprenticeship program." - Penny Dunning (EmployIndy)*



School districts should award academic credit for pre-apprenticeship programs offered to in-school students and should conduct a quality assessment of these programs. Additionally, we recommend that pre-apprenticeships include direct financial assistance as needed to enable participants to successfully complete the program. We recommend that pre-apprenticeship be available to individuals age 14 and older – and we support the expansion of pre-apprenticeship models that take place in schools and in out-of-school contexts.

## Defining Youth Apprenticeship

The definition of youth apprenticeship is an important lever for ensuring scalability and quality. We recommend the definition of youth apprenticeship as a program that includes the following core elements:

- Is Registered under the National Apprenticeship Act.
- Is designed for youth not younger than age 16 or older than age 24.
- A youth-apprentice co-design body that includes youth not younger than age 16 or older than age 24, former youth apprentices, and, to the extent practicable, current youth apprentices, who:
  - Contribute materially to the design and implementation of the program;
  - Conduct oversight related to the program and regularly provide recommendations for improvement; and
  - Are compensated for their time.
- Related classroom-based instruction, which may be fulfilled through dual or concurrent enrollment.
- Related technical instruction combined with on-the-job training.
- Offers a progressively increasing, clearly defined schedule of wages to be paid to the youth apprentice.
- For apprenticeship programs that focus on Opportunity Youth or Out-of-School Youth, we recommend ensuring access to additional elements, which are aligned with WIOA. These elements include:
  - Supportive services as defined in WIOA, including mental-health services, and mentoring for the duration of the apprenticeship;
  - Follow-up services for not less than 12 months after the completion of participation, as appropriate;
  - Financial literacy education;
  - Direct financial assistance during periods of related technical instruction that enables apprentices to successfully complete the program;
  - Adequate training for mentors and qualified instructors;
  - For apprentices who do not have a regular high school diploma, results in the attainment of a regular high school diploma or its equivalent;
  - Provides academic credit at an institution of higher education, directly or through a dual enrollment or credit articulation agreement;<sup>1</sup>
  - Includes attainment of a recognized postsecondary credential, as defined in WIOA; and



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- Results in employment leading to economic self-sufficiency or entrance into further postsecondary education or training.

We recommend that the Secretaries of Education and Labor develop and present a report to Congress that details recommendations for apprenticeships to receive standardized postsecondary credit.

We recommend the use of WIOA definitions for terms including “recognized postsecondary credential” and “supportive services.”

## Defining Youth Apprentices

**We recommend that youth apprentices be defined as anyone age 16 through 24.**

Teenage high school students and 24-year-old Opportunity Youth (young people disconnected from school and work) can benefit from apprenticeship, and the model is flexible enough to serve young people in different developmental stages and contexts well. Apprenticeship programs generally have entrance requirements and processes that ensure program participants are a good fit. If further narrowing is needed, young people who are out of school and out of work (Opportunity Youth) or the WIOA-defined Out-of-School Youth population should be prioritized.

## Eligible Training Providers

We recommend that a broad spectrum of organizations be eligible to provide training and related instruction for youth apprentices. Given the variance in local youth service ecosystems, this provides the best chance for all communities to benefit from apprenticeship expansion. We recommend the following types of organizations be eligible education and training providers:

- an area career and technical education school;
- an early college high school;
- an educational service agency;
- a high school;
- a local educational agency or State educational agency;
- a Tribal educational agency, Tribally controlled college or university, or Tribally controlled postsecondary career and technical institution;
- a postsecondary educational institution;
- a minority-serving institution;
- a community-based organization, as defined in WIOA;
- eligible providers of youth workforce investment activities, as defined in WIOA;
- a provider of adult education and literacy activities under the Adult Education and Family Literacy Act (29 U.S.C. 3271 et seq.);
- local agency administering plans under title I of the Rehabilitation Act of 1973 (29 U.S.C. 720 et seq.), other than section 112 or part C of that title (29 U.S.C. 732, 741);
- related instruction provider, including a qualified intermediary acting as a related instruction provider as approved by a registration agency;



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- Job Corps center (as defined in section 142 of the Workforce Innovation and Opportunity Act (29 U.S.C. 3192)); and
- a consortium of these entities.

## Apprenticeship Expansion Grants: Use of Funds

We are pleased to see Congressional interest in codifying grant programs to expand youth apprenticeship. We recommend the following uses of funds for these grants:

- Use at least 10 percent of the award funds to provide direct financial assistance to pre-apprentices and youth apprentices through grants to support their financial needs to enter, remain enrolled in, and complete the covered apprenticeship program, such as support for the costs of supplies and equipment, assessment or licensure fees, courses, transportation, child care, dependent care, internet access, housing, and other supportive services.
- Support a youth-apprentice co-design body that includes youth not younger than age 16 or older than age 24, former youth apprentices, and, to the extent practicable, current youth apprentices, who:
  - Contribute materially to the design and implementation of the program;
  - Conduct oversight related to the program and regularly provide recommendations for improvement; and
  - Are compensated for their time.
- Provide professional development activities, including the provision of mental-health first aid training to all staff who spend most of their time working with youth apprentices.
- Provide ongoing support to employers of youth apprentices, including training on positive youth development approaches, needed equipment or resources to support youth apprentices, and case management for employers.
- Establish or expand partnerships with organizations that provide program participants access to financial planning, mentoring, and supportive services that are necessary to enable an individual to participate in and complete a program under the national apprenticeship system.
- Establish business advisory councils and conduct outreach to businesses that may not be considering apprenticeship.
- Conduct outreach and recruitment activities, including marketing apprenticeship programs to potential youth apprentices.
- Conduct assessments potential participants for, and enrolling of participants in, a Registered Apprenticeship.
- Mitigate barriers to participation and increase retention, including facilitating access to government-issued identification and other key documentation and such as through career-navigator models.
- Conduct outreach, engagement, recruitment, and coordination of activities with employers, industry associations, labor and joint labor-management organizations, qualified intermediaries, education and training providers, State or local workforce agencies, potential sponsors, community-based organizations, communities with



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high numbers or percentages of nontraditional apprenticeship populations, small- and medium-sized businesses, or rural communities to establish or expand industry or sector partnerships and opportunities under the national apprenticeship system.

- Conduct evaluation and reporting activities.

## Apprenticeship Expansion Grants: Funding Type and Levels

We recommend formula funding to expand apprenticeship. Competitive grants made by the Department of Labor in recent years have served to expand apprenticeship in geographic areas, in sectors, and by types of organizations that are already offering apprenticeships. We support a significant new federal investment of a size that will drive expansion of apprenticeship in all States, across geographies, and into new industry sectors. Using the WIOA Youth funding formula, we recommend authorizing enough funding such that each state would receive at least \$1 million to expand apprenticeship under the WIOA minimum allotment.

**Finally, we recommend that any funding for youth apprenticeship align with WIOA's 75 percent minimum expenditure on out-of-school youth, or similar successor provision that prioritizes Opportunity Youth.**

## Expanding Apprenticeship through WIOA Reauthorization

A reauthorization of the National Apprenticeship Act or other legislation related to apprenticeship must be aligned with the current WIOA statute and any future reauthorization. WIOA already encourages participation in work experiences for young people and provides supportive services to ensure young people can complete programs. Local workforce development boards should seek to incorporate apprenticeship programs into their service ecosystem. New resources for apprenticeship should not be an excuse to cut already-threadybare appropriations for WIOA programming.

- Legislation should make clear that expenditures by local workforce development boards (LWDBs) on pre-apprenticeship and youth apprenticeship count toward requirements related to work-experience expenditures – and that LWDBs receive credit toward performance targets for outcomes of such programs.
- Youth apprenticeship programs should demonstrate their alignment with local plans described under WIOA for their service area.
- Local workforce development boards should be required to conduct outreach to youth apprenticeship programs in their area when they procure Sec. 129 Youth Services, to establish referral and co-enrollment relationships with youth apprenticeship programs, and to seek to share administrative data with youth apprenticeship programs. Young people aged 18-24 can either enroll in a dedicated youth apprenticeship program or a traditional apprenticeship program designed for adults.

*"JobsFirstNYC supports the expansion of apprenticeship programs as a life-changing tool for young adults to explore career pathways and gain valuable on the job experience while earning a living wage. Apprenticeships also foster the development of essential work skills in a dynamic and competitive workforce." – Christine James-Mckenzie (JobsFirstNYC)*



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- LWDBs should include youth apprentices as board members, to the greatest extent practicable.
- LWDBs should cultivate and support apprenticeship programs targeting in-demand and emerging industry sectors in their area.

## Appendix: These Recommendations Come from the Field

These recommendations were developed by members of NYEC's Apprenticeship Subgroup, which includes representatives of state and local workforce agencies, community-based service providers, intermediary organizations, philanthropy, and young people.

Name	Organization	Location
Sharlet Barnett	Arizona Center for Youth Resources (ACYR)	Phoenix, AZ
Michelle Day	Equus Workforce Solutions	Indianapolis, IN
Penny Dunning	EmployIndy	Indianapolis, IN
Larry Eisenstadt	Minnesota Department of Employment & Economic Development	Minnesota, MN
Ren Floyd-Rodriguez	San Francisco Office of Economic & Workforce Development	San Francisco, CA
Faith Goldstein	Philadelphia Youth Network	Philadelphia, PA
Elizabeth "Liz" Hoagland	Fairfield County's Community Foundation	Norwalk, CT
Roman Jackson	JobsFirstNYC	New York, NY
Christine James-McKenzie	JobsFirstNYC	New York, NY
Matthew McNally	Equus Workforce Solutions	Joplin, MO
Josh Morrow	NYEC (Youth Advisory Council)	Gary, IN
Tera West	Equus Workforce Solutions	Louisville, KY
Orrian Willis	San Francisco Office of Economic & Workforce Development	San Francisco, CA
Rakiya Witwer	New Door Ventures	San Francisco, CA

NYEC staff who assisted the Apprenticeship Subgroup include Thomas Showalter, Director of Policy, Ervin Bishop, Policy Manager, Bobby Brown, Program Coordinator, and Dr. Mary Ann (Mimi) Haley, Executive Director.

*"Youth apprenticeship serves as an economic and opportunity equalizer in many other countries. The model at scale is past due in the United States, but with the appropriate changes to legislation and investments, we have the potential to unlock a powerful fiscal multiplier. As important as the financial benefits, our youth deserve pathways paved by permanent funding formulas for career preparation and advancement." - Orrian Willis (San Francisco Office of Economic & Workforce Development)*