Policy Letter #27

TO: **All Mid-Carolina Workforce Development Board Service Providers**

FROM: **Samantha Wullenwaber, Director**

SUBJECT: **Registered Apprenticeship & Pre-Apprenticeship Policy**

PURPOSE

The purpose of this policy is to provide guidance for the development, implementation, and oversight of Registered Apprenticeship (RA) and Pre-Apprenticeship (Pre-RA) programs. RA and Pre-RA initiatives supported by the Mid-Carolina Workforce Development Board (WDB) align with federal and state workforce regulations, promote equitable access to training opportunities, and support career pathways that lead to sustainable employment and economic growth.

BACKGROUND

Registered Apprenticeship and Pre-Apprenticeship programs are proven strategies for developing a skilled workforce that meets the needs of employers while providing individuals with paid, structured, and progressive training opportunities.

- **Registered Apprenticeships (RA)**: A federally authorized, employer-driven training model that combines paid on-the-job training with related instruction. It serves as an "earn and learn" strategy, offering job seekers immediate employment, sustainable wages, and a clear career path. Employers benefit from a skilled, productive workforce trained to industry standards. Program completers earn nationally recognized, portable credentials, with training often applicable to further post-secondary education. The U.S. Department of Labor's (USDOLs) Office of Apprenticeship, in partnership with State Apprenticeship Agencies (SAA), oversees program registration, quality assurance, and compliance with federal and state standards. Registered Apprenticeship Programs (RAPs) may be registered with the USDOLs Office of Apprenticeship or by other designated SAA.
- **Pre-Apprenticeships (Pre-RA)**: A structured training program designed to prepare individuals to enter and succeed in a RA. It serves as a bridge for participants—particularly youth, jobseekers with barriers, or those with limited work experience—by building foundational skills, knowledge, work readiness, industry exposure, and confidence necessary for successful transition into a full apprenticeship. Pre-RA programs must demonstrate a documented linkage to at least one Registered Apprenticeship sponsor.

Mid-Carolina WDB recognizes RA and Pre-RA as priority strategies to advance WIOA performance goals, expand work-based learning opportunities, and support employers in addressing critical workforce shortages.

ACTION

Registered Apprenticeship Programs

All RAPs consist of the following five core components – direct employer involvement, On-the-Job Training (OJT), related instruction, rewards for skill gains, and a national occupational credential:

- **Employer Involvement:** Employers are the foundation of every RAP, and the skills needed for workforce success form the core of the model. Employers must play an active role in building RAPs and are involved in every step of their design and execution.
- **On-the-Job Training:** Every RAP includes structured OJT. Companies hire apprentices and provide hands-on training from an experienced mentor. This training is developed by mapping the skills and knowledge the apprentice must learn over the course of the program to be fully proficient at the job.
- **Related Instruction:** Apprentices receive related instruction or classroom style training that complements the OJT. This instruction helps refine the technical and academic skills that apply to the job. Related instruction may be provided by a community college, technical school or college, an apprenticeship training school, or by the business itself. This instruction can be provided at the school, online, or at the work site.
- **Rewards for Skill Gains:** Apprentices receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate apprentices as they advance through training and become more productive and skilled at their job.
- **National Occupational Credential:** Every graduate of a Registered Apprenticeship program receives a nationally recognized credential, referred to as a Certificate of Completion, which is issued by USDOL or a federally- recognized SAA. This portable credential signifies that the apprentice is fully qualified to successfully perform an occupation. Many RAPs particularly in high-growth industries such as health care, advanced manufacturing, and transportation also offer interim credentials as apprentices master skills as part of a career pathway.

Training Duration

The length of training and the skills and competencies required for mastery of an occupation are set by industry. Traditional RAPs are time-based and require a specific number of hours of OJT and related instruction. Participants are required to have a minimum of thirty-two (32) hours of combined classroom instruction and on-the-job training. In North Carolina, a RA requires at least 144 hours of classroom-based education for every 2,000 hours of on-the-job learning (2,000 hours = about one year).

RA Outcomes and Workforce Innovation and Opportunity Act Funding Performance

RA is fully aligned with the employer-focused, work-based training that Workforce Innovation and Opportunity Act Funding (WIOA) envisions. Features of RA, including its flexibility, opportunities for immediate earnings, and emphasis on partnerships, make it an effective strategy to meet workforce system goals. Additionally, the outcomes attained by apprentices and graduates of RAPs can lead to strong WIOA performance results. Adopting RA as a workforce strategy can help advance the goals of WIOA – a transformed public workforce system that improves employment opportunities for job seekers and workers through an integrated, job-driven system that links diverse talent to the nation's employers.

RA Expenditure Requirement for WIOA Funding

The Registered Apprenticeship Expenditure Requirement for WIOA Funding Commission

Policy Statement directs Mid-Carolina Workforce Development Board (WDB) to spend 6% of their non-administrative WIOA Title I Adult and Youth funds annually on pre-apprenticeship and registered apprenticeship-related activities, beginning with Program Year 2025 funding.

The 6% expenditure may be allocated from Adult funds, Youth funds, or proportionally from both, based on the aggregate total of funds. Mid-Carolina WDB retains discretion to determine how this requirement will be fulfilled within the local area.

The 6% Youth apprenticeship/pre-apprenticeship expenditures will be captured and included in the Youth 20% work-based learning expenditures. Mid-Carolina WDB must will report the apprenticeship/pre-apprenticeship and work-based learning expenditures separately.

Expenditures will be reported monthly in the Workforce Information System Enterprise (WISE) Monthly Financial Report.

Supporting RA with WIOA Funding
With the significant expansion of RAPs in high-demand fields, WIOA Title I funds, in addition to other sources of public and private funds, can be used to support RAPs.

WIOA funding can be used to support RA in the following ways:

- **Individual Training Accounts (ITAs)**
  RA sponsors are able to use ITA funds to support the educational portion (i.e., related instruction component) of the registered apprenticeship for eligible apprentices. ITAs can also finance pre-apprenticeship training in preparation for formal RA if they are on the State Eligible Training Provider List (ETPL). RAPs should be encouraged to register on the ETPL in order to receive funding support. Mid-Carolina WDB will have up-to-date lists of RAP sponsors from their OA and SAA offices in order to promote and encourage participation.

- **Youth Occupational Skills Training**
  Youth occupational skills training is a required program element under WIOA that includes RA as a viable training option for youth 16-24 that provides both a living wage and a pathway to self-sufficiency. This program element also emphasizes training that aligns with in-demand industry sectors and occupations, which is a key component of RAPs.

- **Youth Incentives**
  Incentives may be used towards the completion of a registered apprenticeship or pre-apprenticeship program. All youth incentives must adhere to the guidelines outlined in § 681.640 for youth.

- **Supportive Services**
  WIOA funds can support a variety of supportive services for apprentices, including books, supplies, childcare, transportation, tools and uniforms.

- **On-the-Job Training**
  WIOA expands the potential for utilizing OJT to support RA. In certain circumstances, up to 75% of the apprentices' wages may be reimbursed by public workforce system contributions if employers meet criteria.

- **Incumbent Worker Training**
  Mid-Carolina WDB will use up to 20% of their adult and dislocated worker funds to pay the Federal share of the cost of incumbent worker training, enabling current workers to remain on the job while in training, which is strongly emphasized in WIOA.

Calculation of the 6% Requirement
To comply with the 6% expenditure requirement for apprenticeship activities, Mid-Carolina WDB must expend 6% of their combined Adult and Youth program funds. This requirement is calculated on the aggregate total of non-administrative Adult and Youth funds, based on the final combined allocation after any transfers. Mid-Carolina WDB has flexibility in how they distribute expenditures between Adult and Youth funds; however, any transfers of Adult, Dislocated Worker, or Youth funds will affect the total amount subject to the 6% requirement.

- Transfers to the Mid-Carolina WDB (in Adult or Youth funding) will increase the required 6% expenditure amount.
- Transfers from the Mid-Carolina WDB (in Adult or Youth funding) will decrease the required 6% expenditure amount.
- Transfers within the Mid-Carolina WDB (Dislocated Worker to Adult) will increase the Adult 6% expenditure amount.
- Transfers within the Mid-Carolina WDB (Adult to Dislocated Worker) will decrease the Adult 6% expenditure amount.

Pre-Apprenticeship Programs
Pre-apprenticeship programs provide instruction and/or training to increase math, literacy, and other vocational and pre-vocational skills needed to enter a Registered Apprenticeship program. Implementing Registered Apprenticeship and pre-apprenticeship models that are aligned with the needs of key industry sectors creates opportunities to advance students, job seekers, and workers along the talent pipeline. A pre-apprenticeship program funded with WIOA funding must have at least one Registered Apprenticeship partner; such pre-apprenticeship programs must possess or develop a strong record of enrolling their pre- apprenticeship graduates into a Registered Apprenticeship program. Once the participant is enrolled in the Registered Apprenticeship program, and if his/her funding has not been exhausted, a portion and/or the balance of funding may be used to cover the costs of the Registered Apprenticeship program's classroom training/related instruction.

Pre-apprenticeship programs generally consist of the following:

- Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;
- Access to educational and career counseling and other supportive services, 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.

Registered Apprenticeship is employment and registered apprentices earn a wage from day one. As previously mentioned, Registered Apprenticeship programs are a strategic intervention that may be reflected in the Measurable Skill Gains indicator and the Registered Apprenticeship Completion Certificate is a recognized post-secondary credential that supports the Credential Attainment indicator.

REFERENCES

OG 02-2021: Guidance for Local Incumbent Worker Grants
OG 07-2025: Work-based Learning Comprehensive Guidance
CPS 09-2021 Change 1: Workforce Innovation and Opportunity Act (WIOA) Youth Formula Funds Expenditure Requirements
TEGL 8-15: Second Title I WIOA Youth Program Transition Guidance
TEGL 9-22: Workforce Innovation and Opportunity Act Youth Formula Program Guidance
TEGL 13-16: Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act
TEGL 21-22: Increasing Equitable Service Access and Employment Outcomes for All Jobseekers in WIOA Programs
TEGL 21-16: Third Workforce Innovation and Opportunity Act (WIOA) Youth Formula Program Guidance
TEN 23-23: Quality Pre-Apprenticeship Programs

ATTACHMENTS

None

CREATION DATE

December 2024
September 2025