



Response to Request for Public Comment

Prepared for California Department of Industrial
Relations, Division of Apprenticeship Standards
California Youth Apprenticeship



Chaffey College



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WHERE ARE THE GAPS IN SERVING THE OPPORTUNITY YOUTH POPULATION? 1.0

There are many gaps in serving the opportunity youth population. These gaps include:

- **Access to quality education and training:** Opportunity youth are more likely to have dropped out of high school or not have a high school diploma. They are also more likely to have lower academic achievement than their peers. This makes it difficult for them to access quality education and training programs that can help them get good-paying jobs.
- **Access to affordable childcare:** Opportunity youth are more likely to be parents than their peers. This can make it difficult for them to participate in education and training programs if they cannot afford childcare.
- **Transportation:** Opportunity youth are more likely to live in low-income communities that lack access to reliable transportation. This can make it difficult for them to get to and from education and training programs.
- **Mental health and behavioral health challenges:** Opportunity youth are more likely to have mental health and behavioral health challenges than their peers. This can make it difficult for them to participate in education and training programs.
- **Criminal justice involvement:** Opportunity youth are more likely to have been involved in the criminal justice system than their peers. This can make it difficult for them to find employment and participate in education and training programs.

These are just some of the gaps in serving the opportunity youth population. Addressing these gaps is essential to helping these young people reach their full potential.



1.0 (Continued)

Here are some specific examples of how these gaps can manifest:

- A young person may be interested in a pre-apprenticeship program, but they may not have the **transportation** to get to the program or the **childcare** to take care of their younger siblings while they are in the program.
- A young person may be interested in an apprenticeship, but they may not have the **academic skills** or the **work experience** that are required for the apprenticeship.
- A young person who has been involved in the **criminal justice system** may be interested in an education or training program, but they may not be able to find a program that is willing to accept them.

These are just a few examples of how the gaps in serving opportunity youth can make it difficult for these young people to access the resources they need to succeed.



I.E. YOUTH PAYING THE PRICE



14%
83,000

of the total youth population are **disconnected** - are not in school or have a job



77%

of residents over 25 **do not have** a 4-year degree



\$36,406

The average balance of **student debt** with **40%** of borrowers leaving college before obtaining a degree

An additional barrier with apprenticeship programs is the **general public's lack of understanding** and familiarity with the program. Apprenticeships are normally associated with labor, construction, and other labor-intensive occupations. For opportunity youth, the **long term-commitments** needed to commit can be a major barrier. There are other varying external and internal issues that affect the lives of these youth, and a long-term time investment to pre-apprenticeship and apprenticeship programs may be very difficult.

Marketing the programs and orienting youth properly will be significant. Pre-apprenticeships and apprenticeships are often met with **skepticism**, as most youth and families **do not have the time for a long ramp-up to secure work**. This may cause disinterest from drops, and disinterest from the program. In addition, employers will also have to be patient with the opportunity population, with some having poor work history or unpreparedness. Regardless of how effective curriculum, training, and employment are for these challenged youth, they would have to accept varying levels of success, failures, and upstarts. New apprenticeship opportunities will take time to find their footing to be effective.

WHAT ARE THE BARRIERS TO ENTRY FOR OPPORTUNITY YOUTH IN ENTERING APPRENTICESHIPS AND PRE-APPRENTICESHIPS? 2.0



In the Summer of 2020, LAUNCH Youth (an Inland Empire initiative) hosted a pre-apprenticeship program for opportunity youth. Barriers for participating youth included:

- No means of transportation
- No home internet access
- No computers/laptops



Beginning in 2020, workforce and education leaders in the Inland Empire participated in a project focused on youth pathways into registered apprenticeship programs. The project assembled a human-centered planning group that was jointly led by community colleges, high schools, WIOA Youth providers, Workforce Development Department managers, and the Chief of the Division of Apprenticeship Standards. The group's task was to identify barriers faced by **in-school and out-of-school youth (ages 16-24)**. The project's design required the partners to remain **"problem-focused"** for approximately 12 months before proposing any specific solutions or changes that would address the barriers. We surveyed and interviewed youth, parents, apprenticeship program administrators, educators, workforce stakeholders, businesses, etc. In total, **94 members of our community** (including youth seeking well-paying jobs) participated in focus groups and interviews to let us know what the world looked like for them and what barriers they observed. We learned that apprenticeship was **somewhat accessible** for youth entering the system in their mid-20s, (slightly less than a third of apprentices fall in that age bracket), but the younger residents were essentially barred from participation.

2.0 (Continued)

In fact, across our region, with roughly **14,000** apprentices, we learned that **only two** residents were able to register as apprentices under the age of 20 in 2019. This is a staggering figure. Over the two years leading up to that, **113,841** students graduated from our region's high schools, meaning even youths that were considered "on-track" and graduating in those years had only a **0.00175%** chance of entering a registered apprenticeship program in our community out of high school. For opportunity youth, entry into a registered apprenticeship program was nearly an impossibility at that age.

It might be easy to infer that the **"A-through-C"** focus of high school education prohibits entry into apprenticeship programs, but the truth is that high school graduates enter the workforce in large numbers and educators typically play a passive role when it comes to the specific jobs and occupations pursued by 18 & 19 year-olds, and certainly less of a role for disconnected youth. During our community engagement, we spoke with training directors of local apprenticeship programs to inquire about what happens with youth applicants, and they informed us of **short application windows** (sometimes opening as infrequently as once every two years) and **long waiting lists** that young apprentice candidates would need to contend with in earning a spot. It became clear that the vast majority of apprentice **slots went to workers that already possessed experience within the industry**. These candidates knew when and where to apply, how to present themselves competitively, and already possessed existing industry connections. While the idea of bringing young people into the trades and into apprenticeship programs resonated with all stakeholders, **it was not a realistic proposition that high school graduates could secure apprenticeships** even had they arrived directly at the training centers in uniform and ready to work.



While stakeholders agreed that apprenticeship represents the "Gold Standard" of work-based learning, they also agreed that the **entry points to apprenticeship remain opaque** and the labor markets supporting apprenticeship employment are mystifying to the workforce, education, and community-based organizations. For opportunity youth, this combination of factors explains why **entry into the apprenticeship system at a young age is nearly impossible**.

Simply creating more pre-apprenticeship programs does not address the primary barriers, either. This is because the expansion of pre-apprenticeship programs - while commendable - does not directly address the question of available apprenticeship opportunities within a given labor market, nor does it help provide opportunity youth a reasonable expectation of apprenticeship employment upon completion of the pre-apprenticeship program if they are competing with experienced workers for the same apprenticeship opportunities.

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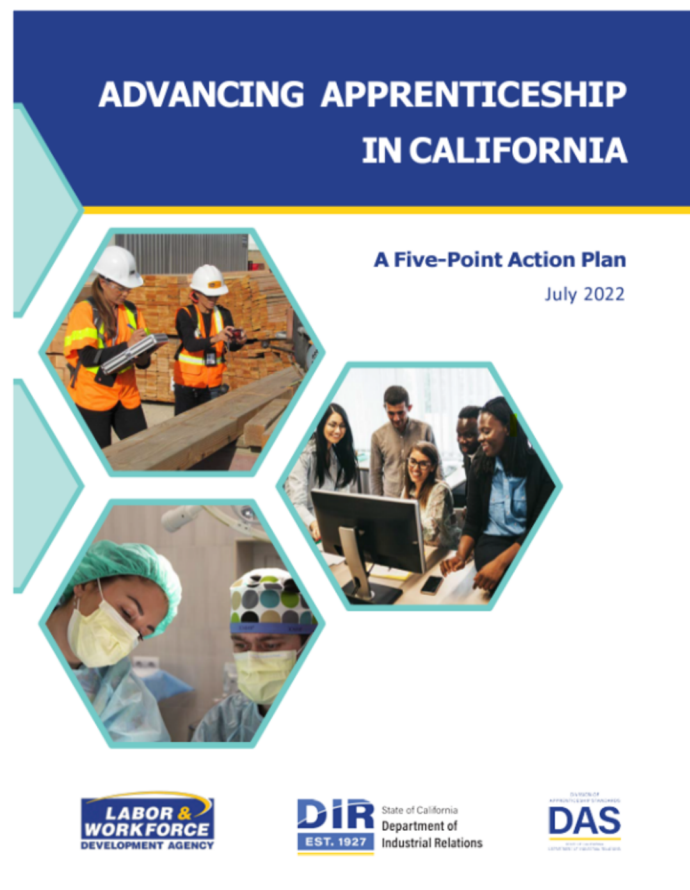
For example, while the state and federal governments are committing millions of dollars to expand pre-apprenticeship that support expanded access to building trades apprenticeship programs, the Department of Industrial Relations has only projected a **5% annual increase** in overall building trades apprenticeship opportunities (see [Division of Apprenticeship Standards Five Point Action Plan](#)) without indicating that apprenticeship would be any less accessible for older workers. It's worth noting that this projection may even prove to be too optimistic as the most recent reports show the number of active apprentices in traditional programs actually declined slightly since last year.

Accurate or not, the DIR's projections tell us that the policymakers are relying on new and innovative apprenticeship programs to make up the vast majority of growth in registered apprenticeship opportunities.

These environmental conditions present two major challenges for opportunity youth desiring to enter apprenticeship programs:

Firstly, despite grant funds, entry into traditional apprenticeship programs are no less competitive or opaque. **Secondly**, new and innovative programs are still in a fledgling state and on-ramps into those apprenticeship programs are even less clearly outlined than in traditional programs. At least in the case of traditional building trades programs, there are aggregated labor and employer markets in the forms of Joint Apprenticeship Committees, and opportunity youth have a finite - albeit lengthy - number of entities they can apply to for apprenticeship employment. In the new and innovative programs, the state has registered and funded competing versions of programs, such as single-employer incumbent worker programs, out-of-state intermediaries, private training providers charging tuition, and one-off programs that discontinue shortly after registration. **By throwing money at the problem and registering programs without regard to youth education and workforce ecosystems, the state is failing to make investments in appropriate systems development that will support long-term sustainability and access for youth.**

The growing plethora of “**program sponsors**” and “**intermediaries**” creates an environment where **opportunity youth are faced with choice overload**. Instead of seeing a clearly defined entry point and pathway, youth are asked to navigate potential program opportunities that even policy-makers, education, and workforce leaders have not committed to sustaining.



2.0 (Continued)

Finally, entering an apprenticeship program represents only half of the equation that opportunity youth face in terms of barriers. Not all apprenticeship experiences are built equally. Highlighting this, in July 2018, the *Center for American Progress* released a report titled **“Apprentice Wage and Participation Gap.”** In the report, they reviewed outcomes among individuals that had both registered and completed apprenticeship programs (meaning those that managed to overcome the obstacles to entry). Among those able to enter and complete the apprenticeship system, outcomes demonstrated **major disparities between race and gender**. The report highlighted the **lack of access to registered apprenticeships for women** (7.3% of apprentice completers in 2017) and also called out the more specific **lack of access to higher-paying apprenticeable occupations**, which has led to women completing apprenticeships making only **42 cents** to every dollar made by their male counterpart. In that same reporting year, Black and African American apprentices made **\$12/hr less** than their white counterparts. Interestingly, data showed that median exit wages for completing apprentices were highest for AIAN, Native Hawaiian/Pacific Islanders, Hispanic/Latino, and Asian apprentices. While the *Center for American Progress* concluded that the wage discrepancies between White, AIAN, Native Hawaiian/Pacific Islanders, Hispanic/Latino, and Asian apprentices could be significantly attributed to regional participation (more White apprentices completed their program in the southern part of the country in lower-wage regions), they did not conclude this same factor explained low wages for Black and African American apprentices because the pattern persisted region-to-region. Instead, the *Center for American Progress* noted the high participation rate of incarcerated Black and African American apprentices better explained the disparity. From 2008 to 2016, the median exit wage – after completing the apprenticeship – for an incarcerated apprentice was just **35 cents** per hour.



(Continued) 2.0

Although this is an outcome figure, we feel this still represents a barrier for opportunity youth - especially Black and African American. Across the state,^[1] about **7%** of apprentices are Black and African American and this closely correlates with the state's overall population. However, if you look closer to find what programs Black and African American apprentices are registered in most often, you'll find **Inmate Programs rank 2nd** just behind Carpentry. The pattern doesn't repeat for other ethnicities.

Of registered apprentices, Inmate Programs represent:

- **12%** Black and African American
- Just under **3%** White
- Hispanic, it's roughly **2%**
- Asian or Pacific Islander, it's just under **4%**;
- **7%** Native American or Native Alaskan
- And for Filipino, it's less than **2%**.

Looking once again at statewide numbers, Black and African American apprentices make up **7%** of the state's overall apprentices, and **28%** of those in Inmate Programs, meaning that **almost a third of Black and African American apprentices complete programs while incarcerated.**

California boasts the largest apprentice numbers across the country and our recent investment in programs like the California Apprenticeship Initiative and Apprenticeship Innovation Funding place us, once again, as national leaders in terms of funding apprenticeship expansion. However, **the fact that individuals are more likely to find an apprenticeship upon entering our prisons than they were attending one of our high schools is appalling.** Yes, opportunity youth have barriers to entering apprenticeship programs, and it seems that **the system itself may be the biggest barrier they face.**

[1] This section uses data pulled from the [Public Tableau Registration Dashboard](#) which was accessed March 6, 2023.

- **Limited types of apprenticeship programs are available.** Typically, apprenticeship programs have been applied toward **skills-related, manual labor-type occupations** (e.g., masonry, electrical, welding, etc.)
- **Requires a long-term commitment** which can be difficult for some job seekers
- **Requires an educational component** conflicting with the aspirations of some job seekers unwilling to go back to school.
- **Accessing programs** – wait times for entry/ eligibility
- Recruitment of host companies willing to participate in apprenticeship programs.
- Keeping participants focused/engaged



2.0 (Continued)

Additional recommendations to address systemic barriers for providers to support opportunity youth entry into apprenticeships and pre-apprenticeships:

- **Align** evidence standards across state agencies and programs that support apprenticeships and pre-apprenticeships.
- **Disseminate** to policymakers and practitioners tools for measuring and evaluating outcomes for opportunity youth served by multiple systems supporting apprenticeships and pre-apprenticeships. and practitioners tools for measuring and evaluating outcomes for opportunity youth served by multiple systems supporting apprenticeships and pre-apprenticeships.
- **Share** best practices for effectively coordinating multiple systems apprenticeships and pre-apprenticeships programs serving opportunity youth.
- **Continue** a process to solicit ideas from a broad array of stakeholders on strategies for improving outcomes for opportunity youth involved in apprenticeships and pre-apprenticeships programs, including how to facilitate comprehensive, multi-system approaches and how to use existing resources more effectively.



FOR ORGANIZATIONS AND SCHOOLS THAT SERVE OPPORTUNITY YOUTH, WHAT ARE THE BARRIERS TO CREATING YOUTH APPRENTICESHIP AND PREAPPRENTICESHIP PROGRAMS?

3.0

When we examine the state's most robust and longstanding apprenticeship system (the building and construction trades), we note that organizations and schools have not focused on "creating" new apprenticeship programs for some time. Over the past two decades, the Division of Apprenticeship Standards has only approved **a small handful of new apprenticeship programs** in these fields. It may come as a surprise but in the early 2000s, the *California Apprenticeship Council*, the *Department of Industrial Relations*, and the *Division of Apprenticeship Standards* published a **guide for educational institutions** and discouraged them from using the term "pre-apprentice" in reference to their programs - as "pre-apprentice" was a term being used by trades as a classification of workers. Instead, educators were encouraged to establish programs of **"Orientation to Apprenticeship"** that were embedded in other curricular and extracurricular activities, multi-phased, and multi-course, and progressively moved youth through reading and writing comprehension, basic math, science, and technology, and eventually introduced them to a particular apprenticeable crafts.[2]

[2] You can access the guidance document referenced above by clicking on the image or at this link:
(<https://www.dir.ca.gov/das/apprenticeship.pdf>).

At a high level, the guidance explains that programs supporting entry into apprenticeship are comprehensive in nature. In addition to providing training, the programs also dynamically introduce participants to apprenticeship by setting up industry speakers, internship opportunities for participants, and mentorships. Training also wasn't limited to industry credentials but included academic, social, and critical thinking skills.

APPRENTICESHIP

APPRENTICESHIP

- apprentice
- employer
- training program sponsor
- local education agency



School-to-Career/Apprenticeship
Orientation to Apprenticeship

a guide for educators

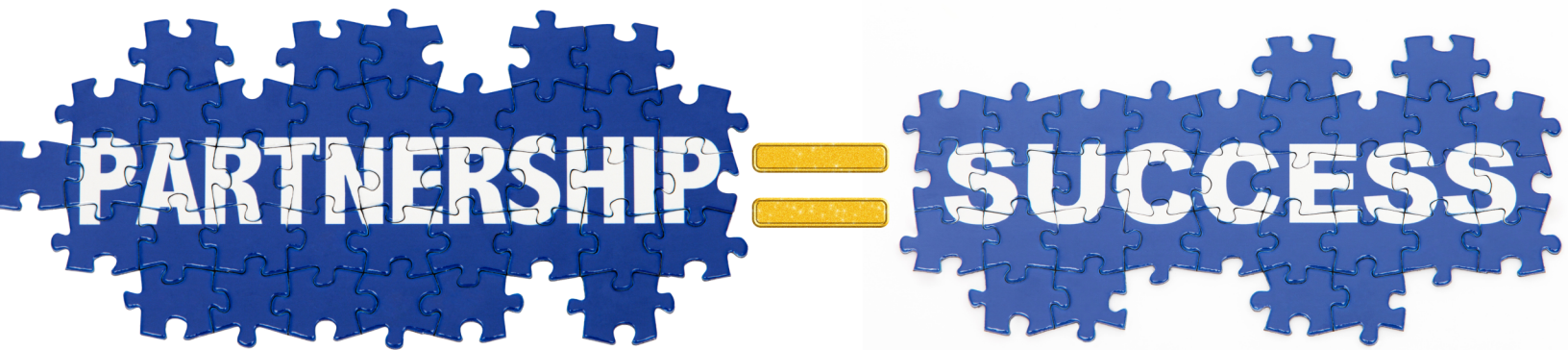
3.0 (Continued)

All of this does not mean that organizations and schools have not participated in apprenticeship programs. Instead, local organizations partner with existing apprenticeship committees and contribute and benefit the system uniquely based on local factors. For example, contractors in the building and construction trades that are interested in developing talent are not encouraged to register whole new apprenticeship programs but are informed and connected to existing apprenticeship committees in their region. Likewise, schools are not responsible for “creating” whole new programs either. Instead, they **complete local education agency agreements** with existing programs that allow them to replicate the same curriculum and funding mechanisms locally. In addition to delivering a curriculum that prepared young people to enter apprenticeship programs, the “*Orientation to Apprenticeship*” guidance also admonished educators not to attempt the program development in isolation from the regional apprenticeship ecosystem, but to include the following components within program development and implementation:

- Identify the appropriate **Industry Partners**
- Gather **Resources** (labor/management, school district, community college, California Department of Education, Regional Occupational Center/Program)
- Form a **Steering Committee** (include representatives from industry, school, and district office staff, school board, community college, and parents) office staff, school board, community college, and parents)

This works because individual apprenticeship programs in the building trades are not created, nor do they persist, in isolation from one another, from schools and organizations, or from our public construction, education, and workforce system as a whole. California sustains apprenticeship in the building trades because **apprenticeship legislation embeds building trades apprenticeships into our public works construction building codes**. These laws and regulations ensure publicly funded construction projects provide millions of dollars in training contributions for local apprenticeship programs (including state infrastructure spending and local construction bonds), contractors (both union and non-union) must follow prevailing wage laws for apprentices, and provide impressive wage progressions, and they must ensure that apprentices are trained in work processes applicable to their craft. If that was not enough, the state has also rolled out **Skilled and Trained Workforce laws** that stipulate contractors must employ percentages of workers that have completed registered apprenticeship programs. Finally, related instruction (the education) for apprentices in the building trades has been a part of our state’s general budget since the 1970s, and local education agencies in the K-14 system receive financial reimbursement for ensuring apprentices receive instruction.

What is challenging for schools and organizations in creating registered apprenticeship and pre-apprenticeship programs is that in addition to creating and registering programs, they are mostly **working without systemic support**. Instead of working in collaboration with local organizations, industry partners, and schools, **organizations are competing for numerous grants and special funding**, and there is limited access to economies of scale. Grant initiatives run in isolation from the ecosystem of the regional workforce and education agencies means that instead of “growing the pie” and developing sustainable infrastructure, we are creating zero-sum competition for program funding, which puts local partners at odds with each other. This may work in some areas, but **apprenticeship thrives on partnership**.



For these reasons, while it may seem intuitive that the influx of funding for apprenticeships should serve to advance the system, this may not be the case. Instead, the various grant initiatives, special funds, and unsustainable and unreplicable pilot projects have created an environment where organizations spend an inefficient amount of time, energy, and money on marketing, packaging, and explaining both their program and apprenticeship as a whole. Concurrently, the various models, program sponsors, categorical funding restraints, intermediaries, new terminologies, changing policies, etc., have created a number of choices, but the **extra choices also mean extra research both for potential participants, parents, and industry partners, as well as for schools and organizations supporting program development**. Researching and understanding apprenticeships in the traditional sectors is challenging enough, and it's nearly impossible in the apprenticeship-emerging sectors. Finally, we are also seeing misleading advertising and faulty information about apprenticeship and pre-apprenticeship and it is difficult for community residents and organizations to know what to trust. State and federal agents do their best, but even they provide conflicting messages and information at times.

3.0 (Continued)

As discussed above, if **organizations** were working **in the building trades**, they **would be connected to longstanding program sponsors** composed of **labor and industry organizations** that have already **aggregated local industry partners**, completed negotiations of **apprentice wages**, agreed about **work processes** and **occupation titles**, and program implementation is relatively straightforward. Those local organizations can speak with relative authority on apprenticeship in their jurisdiction and can provide realistic and meaningful expectations to potential participants and partners. For new programs, these program sponsors generally do not exist. Even in cases where industry associations and unions are present, those entities have not been running apprenticeship programs for decades and they face the same steep learning curve as any organization would, while concurrently not possessing the same infrastructure enjoyed by the building and construction unions, which includes local training facilities and publicly subsidized apprenticeship training contributions. In addition to handling the steep learning curve that comes with a registered apprenticeship, organizations, and schools trying to create programs are also responsible for overcoming the lack of systems development coinciding with the apprenticeship initiative.

The current challenge of designing and creating pre-apprenticeship programs demonstrates this conundrum. For example, as discussed above, **the Department of Industrial Relations projects that the majority of growth in apprenticeship programs over the next five years will come in the form of new and innovative apprenticeship programs (industries not traditionally served by apprenticeship)**. Presumably, schools and organizations creating pre-apprenticeship programs today should be designing programs that lead participants to enter those programs - as that is where the most opportunity for apprentice employment would be. However, since the programs do not exist yet, **it is impossible** for those same schools **to accurately determine entry qualifications participants should be trained towards** and **there is also no way to provide reasonable expectation of entry**. Is a school or organization developing a pre-apprenticeship program in an apprenticeship-emerging sector with few apprenticeship opportunities misleading participants if they express that the program leads to an apprenticeship? What does it mean if a pre-apprenticeship leads to nowhere? The necessity of linkage agreements with program sponsors solves this partially, but it doesn't address the broader challenge of accurately predicting the appropriate number of apprenticeship opportunities that will be available within a labor market.

The simple fact is that **no one school or organization can establish strong, effective, and sustainable apprenticeship or pre-apprenticeship programs without broader systemic support and collaboration**.

There must be Industry buy-in to implement successful apprenticeship programs. To develop promising apprenticeships a relationship with employers and industry takes a time investment. Some employers do not have the time to help create a training plan or strategy as production, service, and operations are continuous. In addition, the process to get apprenticeship programs approved through State Standards and requirements can take a long time.

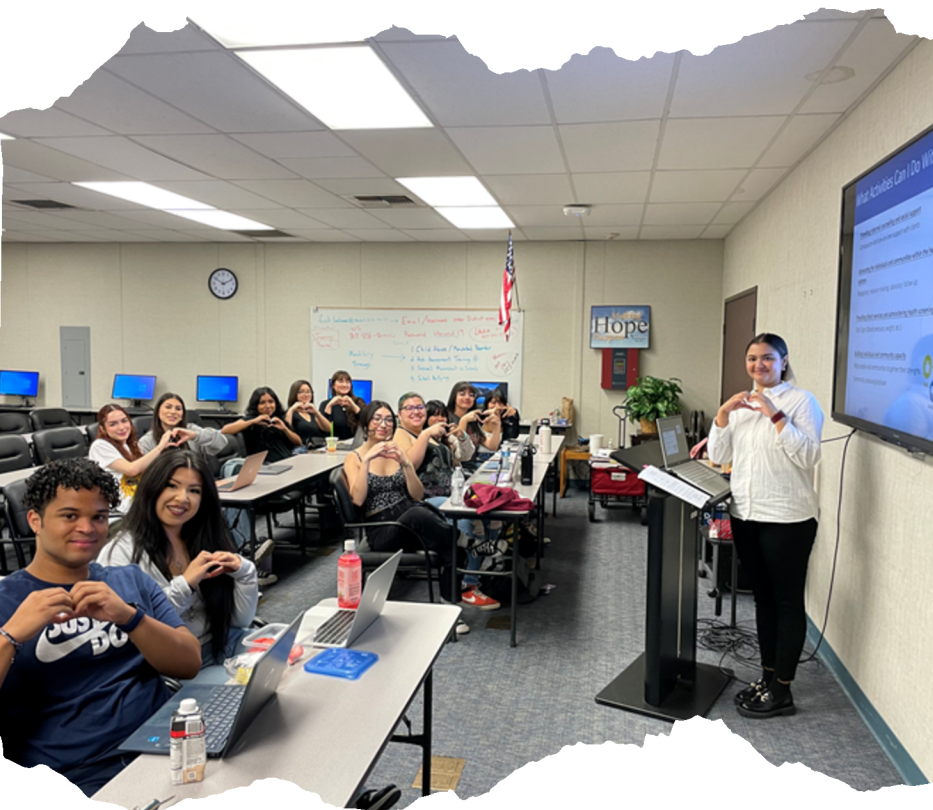
HOW CAN THIS FUNDING BE MOST EFFECTIVELY UTILIZED TO SERVE OPPORTUNITY YOUTH? AND PLEASE COMMENT ON IF/HOW YOU THINK THIS FUNDING SHOULD BE BRAIDED WITH OTHER FUNDING SOURCES?

4.0

Establish a process to identify state and federal waivers and braided funding opportunities consistent with the legislative, statutory, regulatory, and administrative requirements. Requirements would include:

- Is consistent with the statutory purposes of the relevant State and Federal program.
- This will result in either:
 - Realizing efficiencies by simplifying reporting burdens or reducing administrative barriers with respect to such discretionary funds; or,
 - Increasing the ability of individuals to obtain access to services that are provided by such discretionary funds.
- Does not relate to nondiscrimination, wage and labor standards, and allocations of funds to State and sub-state levels.

This flexibility would allow public and nonprofit service providers to streamline a process to effectively support opportunity youth in entry into apprenticeship programs.



Summer 2023 **Community Health Worker Youth Apprenticeship** cohort attending their first orientation session kicking off the start of the program.

San Bernardino City USD is piloting the program as both the Local Education Agency and the Employer.

Core training is being provided by **Reach Out**, a local 501 (c)(3).

5.0

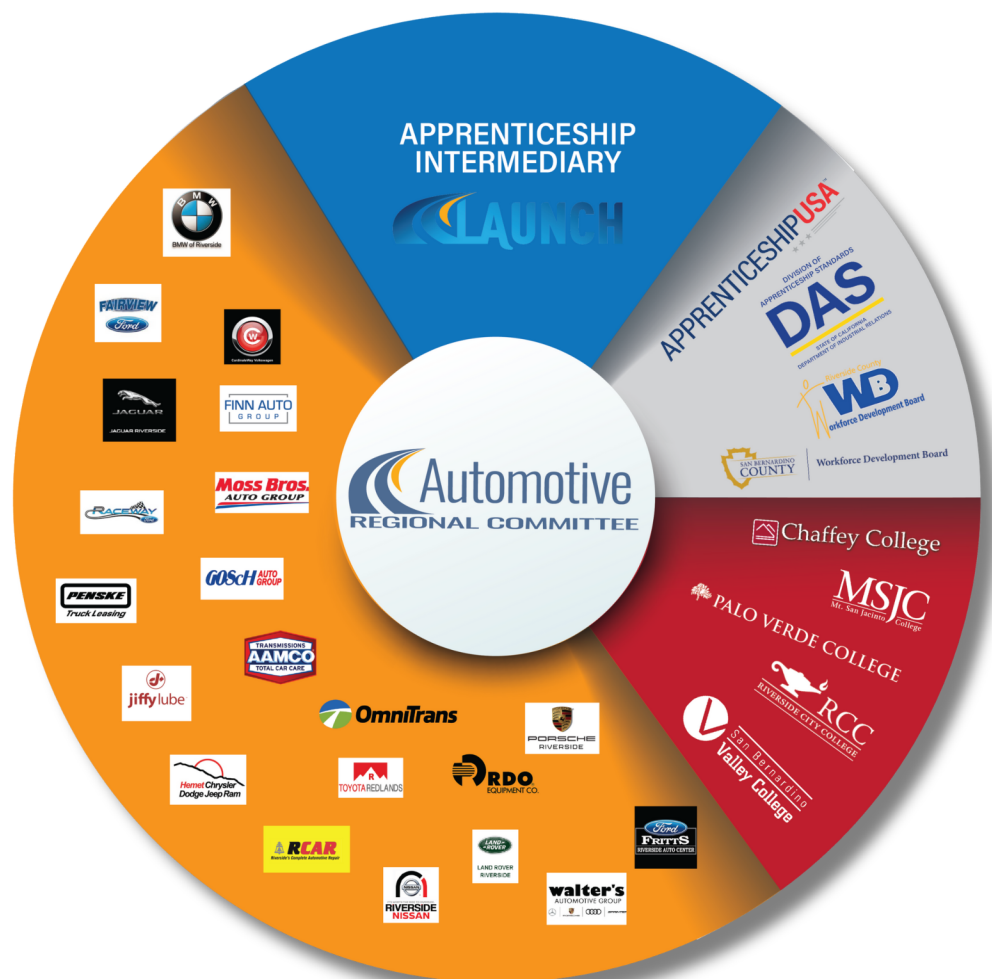
IF YOU WERE APPLYING FOR FUNDING, WHICH OF THESE FUNCTIONS WOULD YOU SEEK TO FUND?

- a. Intermediary role
- b. Recruitment of participants
- c. Recruitment of hosting companies
- d. Training costs
- e. Participant wages
- f. Supportive services
- g. Other?

If we submitted an application, it would likely be submitted through our **regional intermediary** or through one or more of our **program providers** or **schools**.

Our region works **collaboratively** on program development and depending on the specific terms of the **RFA**, we would decide who the **best lead entity**, or entities, would be.

The Inland Empire focuses on establishing **regional apprenticeship committees in different industry sectors**. The committees are composed of employer partners that provide apprentices on-the-job learning, education partners that provide instruction and training, and workforce and community organizations that support access for community residents. The region often uses an **intermediary program sponsorship structure** for apprenticeships in non-traditional sectors.



IN YOUR EXPERIENCE WHAT ARE THE COSTS OF SUPPORTING AND PLACING OPPORTUNITY YOUTH INTO A PREAPPRENTICESHIP OR AN APPRENTICESHIP? 6.0

COSTS ON A PER-PARTICIPANT BASIS ARE MOST HELPFUL.

Firstly, we want to emphasize the importance of [systems development](#) and [leveraging regional assets](#) in program design. If an apprenticeship or pre-apprenticeship program ran in isolation from other state and local initiatives, the cost of the project would be extraordinarily high because of the level of systems development required. This past year we've run a project for which the objective was to [support opportunity youth trying to enter the apprenticeship system](#). Through community outreach, project staff engaged [3,326 youth \(ages 16-24\)](#) and provided short workshops on apprenticeship generally. The workshops were designed to provide meaningful and compelling information about the value of apprenticeships for youth. Workshops were held for both [in-school and out-of-school youth](#) and involved parents wherever possible. From the outreach efforts, [373 youth](#) requested further information about services and training that would help them enter apprenticeship programs. From that group, [96](#) individuals enrolled to participate in services. The total project cost was roughly [\\$5,000 per enrolled participant](#), although it serves a broader impact, as well. A beneficial aspect of the project is that it did not narrowly focus on just one occupation or potential program, and instead [focused on connecting youth with available programs and services relative to their interests and qualifications](#) (or need for qualifications). This meant that project staff didn't need to spend as much time doing program development items such as curriculum development, equipment purchases, etc., and could focus more on [developing a strong network of organization and industry partners](#) that has led to sustainable and scalable structures that will live beyond the initial grant project.

***Note:** This is in alignment with the recommendations published by the state regarding "Orientations to Apprenticeship." A high percentage of the participants are entering programs this fall and [services of the project will continue for all enrollees until we help them secure apprenticeship employment](#).*

Apprenticeships need [full-time staff to be successful](#). This requires much time and effort to be run efficiently. Developing and reviewing curriculum, outreach to employers, working with employers, marketing to youth, and placing youth in apprenticeship



6.0 (Continued)

The costs of supporting and placing opportunity youth into a pre-apprenticeship or an apprenticeship can vary depending on the program, the location, and the individual needs of the youth. However, some general costs to consider include:

- **Recruitment and assessment:** This includes the costs of advertising the program, screening applicants, and conducting assessments to determine their eligibility and readiness for an apprenticeship.
- **Training:** This includes the costs of providing training in the specific skills and knowledge required for the apprenticeship. This can include both classroom instruction and hands-on training.
- **Mentoring:** This includes the costs of providing mentors to youth who are participating in the program. Mentors can provide guidance and support, and help youth navigate the apprenticeship process.
- **Wraparound services:** This includes the costs of providing other services to youth who are participating in the program, such as transportation, child care, and financial assistance.

The cost of supporting and placing opportunity youth into a pre-apprenticeship or an apprenticeship can range from a few thousand dollars to tens of thousands of dollars per participant. The specific costs will vary depending on the program, the location, and the individual needs of the youth.

The state should consider **grading criteria** for applicants that **efficiently leverage other public and philanthropic resources** - including strong organizational partnerships - alongside any awarded project fund.

The Inland Empire has learned that **apprenticeship outreach to youth needs to consist of an on-going coordinated effort** among workforce and education organizations that provides compelling and meaningful introductions to apprenticeship and connects youth to services as needed.



HOW WOULD YOU BALANCE PRIORITIES FOR YOUTH WHO ARE IN SCHOOL AND YOUTH WHO ARE OUT OF SCHOOL? 7.0

Based on our experience, we think **it is unwise to consider pre-apprenticeship programs simply as short-term training that leads directly to employment as apprentices.** As discussed above, and as consistent with the recommendations in previous guidance, effectively supporting youth trying to enter apprenticeship programs is more about having **integrated education systems** that provide orientation to apprenticeship, **weave secondary and post-secondary education with apprenticeship**, and provide long runways and onramps that may include remedial services. This is especially important coming out of the COVID pandemic where youth suffered some of the hardest effects. For all youth, it is significant that K-12 districts, county offices of education, community colleges, and adult education agencies **work in collaboration** with **Youth Opportunity programs.**

As mentioned above, one of the greatest challenges of access to apprenticeship is that the **system has become so disconnected from high schools**, this impacts both in-school and out-of-school youth, and **no youth population has been significantly served by apprenticeship in recent decades.**

Opportunity youth will need greater supportive services and, for that reason, **we would balance flexible grant dollars towards that purpose.** However, much of the work plan contained in these projects should include **longer-term systems development within the K-14 system.** For that objective, there is some need for funding, but there is also a **greater need for time and meaningful impact goals.** It would be a tragedy to see these funds quickly spent and the programs quickly disappear shortly afterward. The broader point should be made that youth can be failed by multiple systems and a part of the challenge they face is navigating the various bureaucracies that we set up to serve them. Integrating apprenticeship into any of our youth-serving institutions would benefit youth broadly and apprenticeship itself can serve as a bridge between services.

Pre-apprenticeships are best suited for in-school youth who do not have the same high need for income. Out-of-school youth can benefit greatly from established apprenticeships.



8.0 WHAT ARE THE KEY METRICS TO MEASURE ON THE EFFECTIVENESS OF THIS PROGRAM?

Aim for **quality, not just quantity**. Too many apprenticeship grants have focused primarily on numbers and this has created a race to the bottom in terms of services. This RFA should first **establish principles of quality youth apprenticeship and pre-apprenticeship programming**, such as the following:

- The program should have **sufficient local education agency partnerships** to address the various academic or remedial education needs of opportunity youth. **Embedding post-secondary options and pathways** into programming will provide opportunity youth with stronger foundations for mid-career advancement.
- Programs should establish **reasonable expectations of employment** for opportunity youth participants and should **prioritize WIOA youth on-the-job training programs**, especially in sectors where apprenticeship programs can serve as a long-term option after the on-the-job training funding period ends.
- **Multi-employer program sponsors should be prioritized** as they aggregate professional pathways and support greater portability of the credential earned during the pre-apprenticeship and apprenticeship phases. If regions do not have identified or established multi-employer program sponsors, this RFA should include aspects of that development.
- The **quality of partnerships must be a metric and priority**. Applications submitted to this RFA should be examined for **how well they integrate this project with regional apprenticeship investments** that have already been made through other state initiatives such as the California Apprenticeship Initiative, K-12 and community college Strong Workforce funding, H RTP-funded programs, and regional apprenticeship industry committees.

Regarding **numerical metrics** (such as the number of youth served) it should be taken into great account that Youth Apprenticeship Programs and Youth Pre-Apprenticeship Programs are significantly different in terms of what those programs would include and how intensive the work would be in establishing one versus the other. As a state, **the vast majority of apprentices are over the age of 24 and only a handful of registered apprentices start under the age of 19**. Generally speaking, **it is an easier proposition to serve and place 22-year-olds into an apprenticeship program than to place 18-year-olds**. It is significantly more difficult to place apprentices under the age of 18 (especially where industry protocols establish 18 as the baseline age for consideration). That being said, older youth (21-24 years old) may have a much greater need for short-term training and immediate employment placement, whereas younger participants may benefit from a longer program with more integrated academic components in alignment with work. Because Youth Apprenticeship Programs would require paid on-the-job learning in a registered apprenticeship program, the ask would be much higher on applications including Youth Apprenticeship into the work plan.

WHAT ARE SUPPORTIVE SERVICES THAT ARE KEY TO SUPPORTING OPPORTUNITY YOUTH THROUGH APPRENTICESHIP AND PREAPPRENTICESHIP? ARE THERE ANY INNOVATIVE PRACTICES TO SUPPORT YOUTH THAT ENHANCE RETENTION AND EMPLOYMENT SUCCESS THAT YOU WOULD HIGHLIGHT?

9.0

There are a number of supportive services that are key to supporting opportunity youth through apprenticeship and pre-apprenticeship. These services can help youth overcome the challenges they face and succeed in these programs. Some of these services include:

- **Career counseling:** This can help youth explore their interests and identify career pathways that are a good fit for them
- **Academic support:** This can help youth improve their academic skills and prepare for college or other post-secondary education.
- **Financial assistance:** This can help youth cover the costs of education, transportation, and other expenses.
- **Childcare:** This can help youth who are parents participate in apprenticeship and pre-apprenticeship programs.
- **Mental health and behavioral health services:** This can help youth address any mental health or behavioral health challenges they may be facing.
- **Mentoring:** This can provide youth with guidance and support from a trusted adult.
- **Transportation:** This can help youth get to and from apprenticeship and pre-apprenticeship programs.

In addition to these traditional supportive services, there are a number of innovative practices that can be used to support opportunity youth. These practices include:



- **Using technology to provide personalized learning and support:** This can help youth learn at their own pace and get the support they need when they need it



- **Partnering with employers to provide on-the-job training and mentorship:** This can help youth gain real-world experience and build relationships with potential employers.



- **Creating a supportive culture that values diversity and inclusion:** This can help youth feel welcome and supported in apprenticeship and pre-apprenticeship programs.

9.0 (Continued)

These are supportive services and innovative practices that can be used to support opportunity youth through apprenticeship and pre-apprenticeship. By providing these young people with the **resources they need**, we can **help them succeed** in these programs and **build brighter futures** for themselves and their communities.

There are also examples of innovative practices not typically used in traditional apprenticeship programs. By implementing these practices, we can help more opportunity youth succeed in apprenticeship and pre-apprenticeship programs and build brighter futures for themselves and their communities.



- **Apprenticeship Readiness Academies:** These academies provide intensive, pre-apprenticeship training to help youth develop the skills and knowledge they need to succeed in apprenticeship programs.



- **Individualized Learning Plans:** These plans provide youth with a customized learning path that meets their individual needs and goals.



- **Career Pathways:** These pathways provide youth with a roadmap for their education and career, and they help youth connect with the resources they need to succeed.



- **Mentorship:** Mentoring can provide youth with guidance and support from a trusted adult, and it can help youth develop the skills they need to succeed in apprenticeship and pre-apprenticeship programs.



- **Mental health and behavioral health services:** This can help youth address any mental health or behavioral health challenges they may be facing.



- **Transportation:** Providing transportation can help youth get to and from apprenticeship and pre-apprenticeship programs, and it can help youth overcome one of the biggest barriers to participation.

(Continued) 9.0

Opportunity youth attempting to enter the apprenticeship do need the following kinds of services:



- Pre-employment training and industry credentialing



- On-going employment placement services We would highlight, again, the importance of multi-employer program sponsors in this particular area. In our experience, it is not uncommon for youth to lose their first job. Program sponsors equipped to support both placement - and **re-placement** - is critical for opportunity youth.



- Housing and childcare expenses



- Access to a flexible funding account that can be tailored to their individual and unpredictable needs



- Tools, uniforms, additional certification costs



- Transportation



- Books/ School Supplies, auxiliary costs associated with training

10.0 WHAT ARE KEY ISSUES IN ENSURING THAT SUCH A GRANT PROGRAM IMPROVES EQUITY OUTCOMES FOR OPPORTUNITY YOUTH?

Our apprenticeship system really struggles when it comes to **accessibility**. As we've demonstrated when discussing barriers, there is always a nuanced (often invisible) condition that stands between residents and the apprenticeship system. For example, in the building trades, most apprentices are already working for an employer signatory with an apprenticeship program and are sponsored into that program after acquiring sufficient work experience.

For opportunity youth, that would mean they need to secure employment, work for years possibly, and only then get into a registered apprenticeship program. The current challenge is that **the apprenticeship ecosystem is siloed from our public institutions**. For example, if opportunity youth go to their community college and ask about apprenticeship, they are most often referred to a private third party as opposed to receiving direct services. This happens similarly with AJCCs and high school programs.

As a state, we need to focus on reintegrating apprenticeship with our public institutions so that they become points of access for residents. This is even more critical for opportunity youth who will need the integrated services of AJCCs, K-14 education institutions, and apprenticeship. **The state of California has suffered from the false convention that apprenticeship is all about employers and labor, while the public community is a passive entity**. This is something we need to change. **Schools should be assessed on how well they connect their students with apprenticeship opportunities**, but to be effective, **the apprenticeship system needs to acknowledge youth as a stakeholder in the apprenticeship conversation**. Programs most recently registered by the state of California do little to address the comprehensive needs of youth while relying on older models of apprenticeship programs (i.e. 2000 hours of OJT and 144 hours of RSI) that simply address occupational competencies.

THE CURRENT CHALLENGE IS THAT THE APPRENTICESHIP ECOSYSTEM IS SILOED FROM OUR PUBLIC INSTITUTIONS.



(Continued) 10.0

It's very telling that in the late 70s, the Division of Apprenticeship Standards issued guidance to apprenticeship committees ([see DAS 101 - Your Apprenticeship Committee Handbook](#)) that explained the purpose of the 1939 Shelley-Maloney Apprentice Labor Standards Act became law "to provide a uniform approach to training youth in skilled occupations through formal apprenticeship training programs." Further, they stipulated that the primary objective of apprenticeship programs is to "train efficiently, to the degree of competency ordinarily expected of journeymen, the proper number of journeymen, the proper number of youths to meet the needs of industry for workers in skilled occupations."

YOUR APPRENTICESHIP COMMITTEE



A Handbook
for
Apprenticeship Committee Members

While we are encouraged to see that apprenticeship can serve older populations, it is notable that for [at least half the duration of registered apprenticeship's existence](#), the system was primarily focused on [youth](#).

Fast forward to today, and it is as though we need a [new apprenticeship act](#) to get back to the starting point.

Department of Industrial Relations Division of Apprenticeship Standards

YOUR APPRENTICESHIP COMMITTEE

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FORWARD

In 1939, the Shelley-Maloney Apprentice Labor Standards Act became law in California. The purpose of the law is to provide a uniform approach to training youth in skilled occupations through formal apprenticeship training programs.

11.0

WHAT ARE EXAMPLES OF ORGANIZATIONS THAT YOU THINK SERVE OPPORTUNITY YOUTH WELL IN CA AND COULD BE GOOD CANDIDATES TO BECOME PREAPPRENTICESHIP OR APPRENTICESHIP PROGRAMS? PLEASE FEEL FREE TO PROVIDE CONTACT INFORMATION.

Community-based organizations play a critical role in providing additional supportive and wrap-around services to opportunity youth. These partners have played a key role in supporting youth in our region.

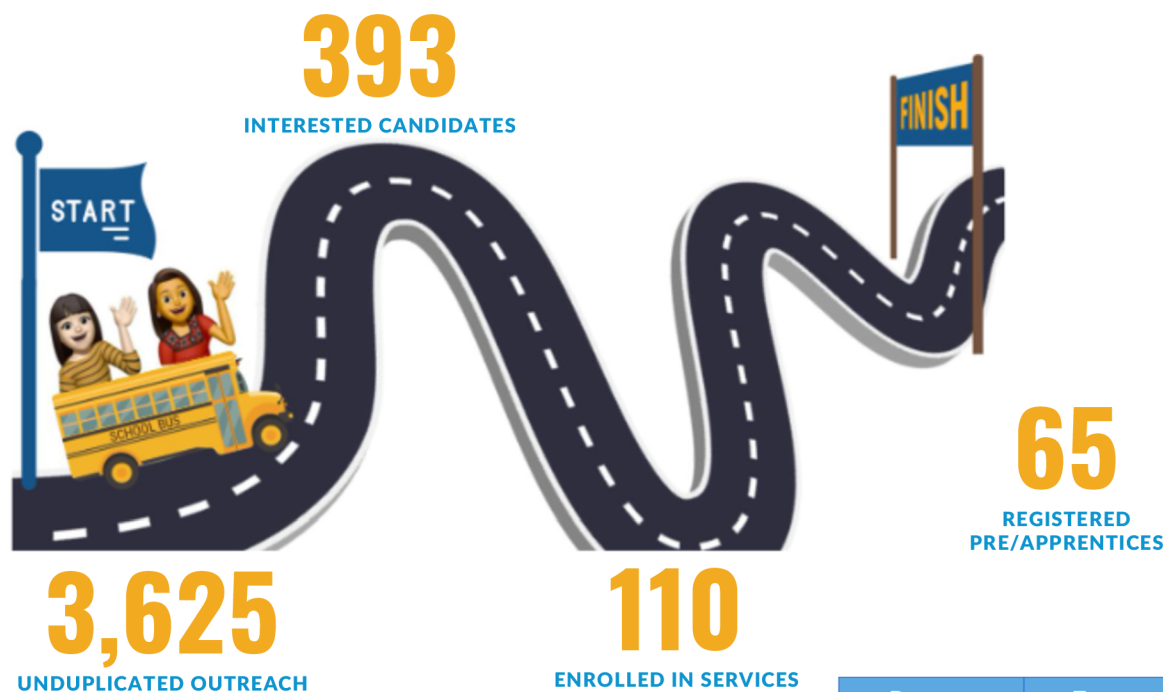


PROPERTIES & WORKFORCE INNOVATION, INC..

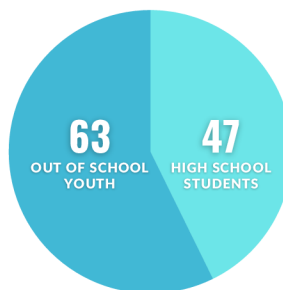


SAN BERNARDINO

2022-2023 INLAND EMPIRE APPRENTICESHIP SYSTEM NAVIGATOR PROJECT



Apprenticeship Goal	
Automotive Technician	29
Community Health Worker	16
Cosmetology	2
Culinary	2
Early Childhood Educator	6
Emergency Medical Technician	1
Industrial Electrician	8
Industrial Mechanic	8
Information Technology > Cyber Security	16
Licensed Vocational Nurse	2
Mechatronics	2
Pharmacy Technician	2
Unsure > Career Exploration	9
Welder	6



Program	Type	LEA	Total
Automation, Robotics, Mechatronics	Pre-Apprenticeship	InTech	1
Automotive Technician	Apprenticeship	SBVC	11
Automotive Technician	Apprenticeship	Chaffey	9
Automotive Technician	Apprenticeship	RCC	9
Early Childhood Educator	Apprenticeship	RCC	6
Information Technology	Apprenticeship	RCC	8
Industrial, Electrical, & Mechanical	Pre-Apprenticeship	InTech	4
Licensed Vocational Nurse	Apprenticeship	RCC	1
Welding	Work-Based Learning	InTech	1

Beginning in **January 2022**, the Inland Empire began employing **Apprenticeship System Navigators (ASNs)** to serve our region's youth. The ASNs provided a compelling introduction to over **3,500** youth and parents/guardians over the last 18 months, and **110** youth, with varying career goals and interests, needed and requested unique services to help them secure apprenticeships. Of those receiving services, **63%** are out-of-school youth. **65 youths** are registering this summer in apprenticeship or pre-apprenticeship programs in the region.

ARE THERE ANY ASPECTS OF THE GRANT'S MECHANICS THAT YOU THINK WE SHOULD BE CONSIDERING FOR THE MOST EFFECTIVE IMPLEMENTATION OF THIS GRANT?

12.0

We would call attention to Governor Newsom's original statements regarding expanding our state's apprenticeship system:



We will create **500,000** apprenticeships by 2029, creating a new vocational education pipeline of high-skill workers.

(ACCESSED ONLINE: [HTTPS://MEDIUM.COM/@GAVINNEWSOM/HERES-HOW-WE-GROW-CALIFORNIA-S-ECONOMY-FOR-EVERYONE-B1B06C7B49C9](https://medium.com/@GAVINNEWSOM/heres-how-we-grow-california-s-economy-for-everyone-b1b06c7b49c9))

Press releases and public meetings have often included references to the goal of **500,000 apprentices**. While much attention is given to the number, it was actually just one part of a three-point plan. The first point and intent of the governor's plan were to establish regional collaborations and organizational structures between industry and education institutions and **leverage the existing infrastructure** to then establish 500,000 apprenticeships. At the end of 2018, the Chief of the Division Standards reported the state had **84,192**. The most recent report in 2023 indicated **89,844** active apprentices which indicates about a **1% increase per year** of overall apprentices. While the growth is moving in the right direction, the pace is probably underwhelming given the energy, funding, and enthusiasm dedicated towards apprenticeship over the past few years.

We contend that a primary factor delaying the scale and expansion of apprenticeship is **the lack of commitment to sustained infrastructure development in alignment with the regional collaborations initially proposed by the governor**. RFAs have focused almost exclusively on **direct pilot program** funding and have not required, nor well-supported, systems alignment that would support sustainability and scale of services provided to youth in the community. Our recommendation is that the committee consider **broader impact language inserted in the application and metrics of the RFA** that would serve to **demonstrate how applicants would address systemic barriers faced by youth** trying to enter apprenticeship programs in their community. The RFA should require applicants to **demonstrate working knowledge of the apprenticeship system** and **applied knowledge of apprenticeship access** within the communities they propose to serve. Simply offering a training program should not be the extent of the funded projects.



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