Proposal for Statewide Apprenticeship Program for High School Students
As Enacted by Ohio Senate Bill 135

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Ohio | Department of Education

TABLE OF CONTENTS

Ohio | Department of Education

Proposal for Statewide Apprenticeship Program for High School Students

Executive Summary

Section 3 of Ohio Senate Bill (SB) 135 (134th General Assembly) directs the Ohio Department of Education's (ODE) state superintendent of public instruction, in consultation with the chancellor of the Ohio Department of Higher Education (ODHE), director of the Ohio Department of Job and Family Services (ODJFS) and stakeholders to develop a proposal for a statewide apprenticeship program for high school students on a pathway to employment or post-secondary education.

Sections within this proposal present findings to address the following:

- **Student Eligibility:** Establish eligibility requirements for a student to participate in an apprenticeship, including a minimum grade-point average or its equivalent.
- **Student Process:** Develop a process by which a student may secure an apprenticeship.
- **Approval and Evaluation:** Create a process for approval of each student's apprenticeship, including a method for evaluating the educational benefits of an apprenticeship and considering qualifying apprenticeships offered in Ohio.
- **Number of Hours:** Determine a limitation on the number of hours per week a student may work in an apprenticeship.
- **Cost to Businesses:** Form a method for determining actual costs to a business participating in an apprenticeship, including workers' compensation, other insurance costs and training costs.
- **Funding Formula for Public High School:** Develop a funding formula for students enrolled in a public high school, including a maximum amount to pay businesses for costs associated with employing students under an apprenticeship.
- **Funding Formula for Chartered Nonpublic High School:** Develop a funding formula for students enrolled in a chartered nonpublic high school, including a maximum amount, to pay businesses for costs associated with employing students under an apprenticeship.
- **Payments to Businesses:** Establish a method for making payments to participating businesses.
- **College Credit:** Determine a method by which any college credit for a certificate or certificates earned in an apprenticeship may transfer to an institution of higher education. Under the method, each institution shall determine whether to accept work after completing an apprenticeship as eligible college credit for admission purposes.

This executive summary provides an overview of the proposal's 34 recommendations across eight categories. Additional information on each proposal is available in the full report.

A. Student Eligibility Criteria:

1. Students should be a minimum of 14 years of age or older to participate.
2. No minimum grade-point average (GPA) or equivalent should be required to participate.
3. Allow local districts or schools to develop additional criteria as deemed appropriate or necessary.

B. Student Process:

Visibility of Available Pre-Apprenticeship Programs:

4. Add pre-apprenticeship postings to OhioMeansJobs.com to increase visibility of opportunities available to students.
5. Attach apprenticeship application to each OhioMeansJobs.com posting to save time in the process.

Ohio | Department of Education

6. Provide a link to the Ohio Department of Education's apprenticeship webpage on each pre-apprenticeship posting on OhioMeansJobs.com.
7. Increase awareness of apprenticeship postings through marketing campaigns.

Application process:

8. Create an electronic submission portal to streamline the apprenticeship application approval process.

Access to transportation

9. Create a comprehensive database of state and local support services for schools and students.
10. Develop the database in collaboration with OhioMeansJobs to expand upon existing resources and to ensure there is no duplication of work.

Equitable Application Process

11. The application process established by the local district or chartered nonpublic school should not limit student participation that would have the effect of disproportionality excluding students of a particular race, color, national origin, sex or disability.
12. Provide equal access to student support for completing the application process or related technical instruction to any student interested in participating in an apprenticeship.
13. Require pre-apprenticeship programs to report their equitable application process in the new application portal.

C. Approval and Evaluation:

14. Add quality of related technical instruction to the apprenticeship application approval and evaluation process.
15. Ohio registered apprenticeship programs are subject to compliance review provided by ODJFS and should also be applied to pre-apprenticeship programs on prescribed occasions.
16. Create a section for program monitoring and evaluation in the proposed electronic submission portal.
17. Create a section for evaluation of student performance in the proposed electronic submission portal.
18. Include a signature approval section for the career technical planning district designee, program school designee and pre-apprenticeship sponsor designee.
19. Increase resources available for monitoring programs, completing evaluations and providing technical assistance for improving program quality.

D. Number of Hours:

20. Provide flexibility to schools and businesses in setting a student's weekly hours around the capacity of the business and the educational considerations of the student through local program design.
21. Use the registered apprenticeship competency-based training approach for pre-apprenticeship program design.

E. Cost to Businesses:

22. Schools and businesses should use the U.S. Department of Commerce and U.S. Department of Labor return-on-investment calculator as the model method to determine actual costs to Ohio businesses participating in a pre-apprenticeship program.
23. The state should complete a more in-depth cost analysis study for pre-apprenticeships.

F. Funding Formula:

Ohio | Department of Education

Funding for businesses: The following funding formula is recommended to pay businesses for costs associated with employing students enrolled in a public or chartered nonpublic high school.

24. An employer of an eligible apprentice should receive reimbursement of program costs up to $2,000 per eligible apprentice.
25. Define "eligible apprentice" as a pre-apprentice currently enrolled in a public or chartered nonpublic high school.
26. Cap reimbursement at $30,000 per employer, per state fiscal year (July 1 to June 30).
27. Limit each employer to one application per state fiscal year.

Funding for both public and chartered nonpublic high schools:

28. Significantly increase the amount reimbursed to schools for each Ohio State Apprenticeship Council Recognized Pre- Apprenticeship Program Certificate of Completing Industry-Recognized Credential reported by the school.
29. Establish new funding, distributed through the career technical planning district, to support apprenticeship programs.

G. Payments to Businesses:
30. Businesses seeking to participate in the program will have the required information to submit through the application process to be eligible to receive payments.
31. Use a proven statewide system for collecting data points from businesses.
32. Should ODJFS be tasked with reviewing applications, establish a mechanism like that used for the incentives under the 2020 State Apprenticeship Expansion (SAE) Grant.
33. ODE should partner with another state agency to issue payments directly to businesses.

H. College Credit:

34. Schools and employers should engage with their local institution of higher education when designing a pre-apprenticeship program.

PROPOSAL DEVELOPMENT AND CONSULTATION

The ODE, ODHE and ODJFS developed the proposal collaboratively with feedback from a variety of stakeholders across the state. External Stakeholder Workgroup members were selected through combined efforts with professional organizations representing business, industry and the education community.

Virtual monthly meetings with the external workgroup began Oct. 5, 2022, and concluded Feb. 2, 2023. The interagency workgroup convened biweekly to discuss external stakeholder and subject matter feedback, local and national research, and draft proposal language. Monthly stakeholder meetings were used to discuss obstacles, gaps and positive initiatives related to current pre- and registered apprenticeship processes in Ohio. External stakeholders and subject matter experts also had the opportunity to review the full draft proposal and provide further comment before submission for agency leadership review and approval.

Appendix A lists the workgroup members.

The proposal must consider several elements, including the process for approval of each student's apprenticeship that considers "qualifying apprenticeships," offered in Ohio. "Qualifying apprenticeship" as defined by SB 135 means any apprenticeship program that is either certified or registered by the United States Department of Labor or any pre-apprenticeship aligned with section 3313.904 of the Ohio Revised Code. Revised Code.

Ohio | Department of Education

ALIGNMENT WITH AGENCY PRIORITIES

Connecting students to college and careers is an important strategy for Ohio. Apprenticeship provides a bridge for students that links classroom learning with practical, real-world work settings to transition from high school more smoothly to career or college and beyond. For many students, the pandemic impacted their ability to access apprenticeship opportunities or to even envision their long-term plans. The ODE's Future Forward Ohio is the state's plan to help students recover from the impact of the COVID-19 pandemic, with a focus on students who experienced the greatest disruptions to learning. Future Forward Ohio prioritizes literacy, accelerating learning, workforce readiness and student wellness to facilitate student success. ODE is dedicated to expanding student access to high-growth, in-demand fields and providing new opportunities for the next generation of the workforce.

High school apprenticeship programs are a value-added talent resource for Ohio businesses that bolster the local economy. To support delivery of sustainable, equipment-dependent workplace education, training and skills, ODHE is making regionally strategic investments that foster a resilient workforce ecosystem. The Regionally Aligned Priorities in Delivering Skills (RAPIDS) program provides grants to purchase equipment and training to aid in specific workforce development needs. Grants are awarded regionally to purchase equipment used by colleges, universities, occupational training centers and business partners to deploy trained workers into existing and emerging jobs. Since its inception, ODHE has conducted six rounds of the RAPIDS programs, investing $47.3 million total across the state in the industries of advanced and additive manufacturing, information technology and cybersecurity, broadband and 5G, and health care.

Looking to strengthen the workforce and assist with training the next generation of workers, the ODJFS Apprentice Ohio office is using funds from its 2020 State Apprenticeship Expansion Grant to support the creation of Pre-Apprenticeship Hubs. Five regionally-based local workforce areas operate hubs focused on developing pre-apprenticeship opportunities within local communities that connect with school districts and leverage employers to support and grow industry. Most of the hubs have focused on exposing high school students to various occupational paths and career opportunities. However, adult programs also are available. The hubs have established pre-apprenticeship pathways in information technology, manufacturing, construction, and automotive and transportation fields.

Currents Laws, Rules and Policies Addressing Apprenticeships

Whether convening partnerships to develop high-quality, effective programs that address the workforce needs of the state or establishing a comprehensive plan to integrate apprenticeship as part of the state's broader workforce strategy, Ohio is providing avenues to grow opportunities for students in high school and prepare more workers for employment through apprenticeship. These efforts are outlined in Ohio law and serve as a road map to address increasing employer demand for skilled workers and worker demand for access to good jobs.

OHIO REVISED CODE

The Ohio Revised Code Chapter 4139 and section 3313.904 define and guide apprenticeship and pre-apprenticeship programs for the state.

Section 4139.01 | Apprenticeship council definitions.
A. "Apprentice" means a person at least 16 years of age, except when a higher minimum age standard is otherwise fixed by law, who is in a registered apprenticeship program to learn a skilled occupation, pursuant to a registered apprenticeship agreement.
B. "Apprenticeship agreement" means a written agreement, registered with the apprenticeship council, providing for not less than 2,000 hours of reasonably continuous employment, and for participation in an approved schedule of work experience through employment, which shall be supplemented by a minimum of 144 hours per year of related and supplemental instructions.

Ohio | Department of Education

C. "Council office" means the unit of the ODJFS that staffs the apprenticeship council and performs the administrative and oversight functions concerning this state's registered apprenticeship system.

Section 3313.904 | Pre-apprenticeship training programs for career-technical education students.
The ODE and ODJFS, in consultation with the Governor's Office of Workforce Transformation, shall establish an option for career-technical education students to participate in pre-apprenticeship training programs that impart the skills and knowledge needed for successful participation in a registered apprenticeship occupation course.

OHIO ADMINISTRATIVE CODE

Ohio Administrative Code section 5101.11 outlines the responsibilities of the ODJFS Apprenticeship Council and supports the guidance provided in the Ohio Revised Code.

Section 5101:11 | Apprenticeship Council.
Ohio Administrative Code rule 5101:11-1-01(II) states that "pre-apprenticeship" means training that imparts skills and knowledge needed for successful participation in a registered apprenticeship occupation course. Pre-apprenticeship programs in Ohio that meet specific quality criteria and are designed and operated in collaboration with registered apprenticeship programs, are eligible for formal statewide recognition under procedures administered by the council office.

This section amplifies Ohio Revised Code section 4139.01 by providing:

> Chapter 5101:11-1 | Definitions
>
> Chapter 5101:11-2 | Administration
>
> Chapter 5101:11-3 | Program Requirements and Procedures
>
> Chapter 5101:11-4 | Apprentice Recruitment and Enrollment
>
> Chapter 5101:11-5 | Equal Opportunity
>
> Chapter 5101:11-6 | Affirmative Action
>
> Chapter 5101:11-7 | Compliance Monitoring
>
> Chapter 5101:11-8 | Response to Non-Compliance
>
> Chapter 5101:11-9 | Exemptions

U.S. DEPARTMENT OF LABOR AND OHIO REGISTRATION

"Apprenticeship program" means a program that is approved by the registration entity to teach the skills of one or more apprenticeable occupation(s), through courses combining on-the-job training and related technical instruction, according to the specifications established by parts 29 and 30 of 29 C.F.R., and in Ohio by the rules under division 5101:11 of the Ohio Administrative Code. This model of training does not correspond to activities designated as "apprenticeship" in other divisions of the Ohio Administrative Code, except where programs are clearly stipulated that conform to this definition.

CURRENT OHIO PROGRAMMING

Ohio's Work-Based Learning Pathway Options guidance recognizes pre- and registered apprenticeships as one of six types of work-based learning experiences:

1. **Pre-apprenticeships** offer students an opportunity to participate in work-based learning experiences in designated occupations or industry sectors in preparation for formal registered apprenticeship training programs. Pre-apprenticeships follow recognition procedures as outlined by ApprenticeOhio.

Ohio | Department of Education

2. **Registered Apprenticeships** have similar but distinct registration requirements through ODJFS to teach a skilled occupation pursuant to a registered apprenticeship agreement. Apprentices must be at least 16 years old, except when a higher minimum age standard is fixed by law. An apprenticeship program must be registered with the ODJFS State Apprenticeship Council to teach a skilled occupation pursuant to a registered apprenticeship agreement. The council registers and monitors Ohio apprenticeship programs to ensure their quality and safety.

CURRENT OPERATIONAL POLICIES

The goal of a state recognized pre-apprenticeship is to provide the skills and work experience needed to be successful in a registered apprenticeship. Current apprenticeship operational policies were examined for alignment with the nine proposal considerations required in SB 135.

A Detailed Proposal to Improve the System of Apprenticeships

It is important to consider how the goals of SB135 will be addressed and how the recommendations within this proposal will be implemented without expanding technological resources available to carry out those recommendations. To grow opportunities, build relationships, improve program quality and increase student accessibility, it is imperative that the state prioritize creating an application submission and data collection portal for pre-apprenticeship.

Currently, pre-apprenticeship program applications are completed by using a fillable form and submitted for approval via email. Registered apprenticeships use the Registered Apprenticeship Partners Information Database System (RAPIDS) as the primary platform for managing apprentices, occupations, job openings and other relevant program information. A pre-apprenticeship portal could be developed and used in the same manner. It also would be helpful to include not only the ability to submit applications but to track the apprentice from application through transition into registered apprenticeship or post-secondary education enrollment. The portal should be designed in consultation with appropriate apprenticeship stakeholders from ODJFS, ODE, employers, sponsors and secondary and post-secondary education. Apprenticeship stakeholders also should be asked to provide input into how the change in process is communicated and a method to address prior approved programs.

This proposal addresses barriers and gaps in the current pre-apprenticeship model. Based on discussion with the SB135 External Stakeholder Workgroup, ODE, ODJFS and ODHE recommend building on the established foundation of pre-apprenticeship to create a statewide apprenticeship program for high school students on a pathway to employment or post-secondary education using the current structure. This will allow:

(1) Businesses to continue partnerships with schools and workforce area and decrease staff time and monetary investments;
(2) Schools to manage and maintain current apprenticeship models while creating additional apprenticeship opportunities; and
(3) State agency staff to streamline processes and resources to operate the apprenticeship program effectively.

As the agencies and external workgroup members considered this proposal, the list of requirements set forth in SB135 were used to identify deficiencies and obstacles to improve current processes. The following sections include a brief description of the current state and then recommendations from the workgroup.

A. STUDENT ELIGIBILITY CRITERIA

Description of current student eligibility criteria:

Students entering a pre- or registered apprenticeship program must meet the registered apprenticeship sponsor's criteria as described in the application for enrollment for each specific program. Registered

apprenticeship sponsors must apply consistent and fair methods subject to approval by the ODJFS [ApprenticeOhio](#) office when selecting applicants. Key takeaways include:

- Pre-Apprenticeship: No statewide requirements.
- Registered Apprenticeship: Student age, minimum 16-years old.
- Eligibility requirements for both pre- and registered apprenticeship can and do exist at a local or program level.

Workgroup discussion:

Several factors were considered in determining eligibility criteria for student participation in a high school apprenticeship program. Current models for pre- and registered apprenticeship student eligibility, state and federal legislation and feedback from the SB 135 External Stakeholder Workgroup were used to develop the criteria for student eligibility.

The following recommended criteria are proposed by ODE, ODJFS and ODHE and per the requirements set forth in SB135. Of note, education stakeholders overwhelmingly expressed that the state should maintain current flexibility in determining participant eligibility requirements at the local level and strongly urge school districts and schools to develop multiple measures to determine eligibility.

> **Recommendation 1: Students should be a minimum of 14 years of age or older to participate.** Participation must align to [Ohio's Minor Labor Law (ORC Chapter 4109)](#). The age requirement should be aligned with the current pre-apprenticeship model in Ohio. Under pre-apprenticeship, there is no statewide age requirement for student participation. The age of a participant is determined by the local school program. After further discussion, it was determined that there should be a statewide minimum age established. Concerns were raised that without a set minimum age inequities in students eligible to participate could create barriers in the apprenticeship program.

> **Recommendation 2: No statewide minimum grade-point average (GPA) or equivalent should be required to participate.** After careful consideration, it was determined that there should be no statewide minimum GPA or equivalent that could create barriers and disparities for students that want, and most need, the opportunity that the program affords. A minimum GPA or equivalent can be determined by the local school program. A GPA or equivalent requirement should be aligned with the current pre-apprenticeship and apprenticeship models in Ohio. Currently, there is no statewide minimum GPA or equivalent required for students to participate in either pre-apprenticeships or apprenticeships. However, the school should provide program accessibility to every student and target those adversely impacted by long-standing inequities in education and the labor market.

> **Recommendation 3: The local district or school may develop additional criteria as deemed appropriate or necessary.** However, eligibility criteria established by a local district or chartered nonpublic school should not limit student participation based on criteria that have the effect of disproportionately excluding persons of a particular race, color, national origin, sex or disability. However, if the apprenticeship program can demonstrate that such criteria have been validated as essential to participation in each program and that alternative equally valid criteria that do not have such a disproportionate adverse effect are unavailable, the criteria can be judged nondiscriminatory. For guidance, see, for example, [March 21, 1979, Guidelines for Vocational Education Programs (OCR-00004)](#).

B. STUDENT PROCESS

Description of current student process:

There is no state-mandated process for students to apply for an apprenticeship. Individual programs have the flexibility to develop their own application procedures once an operating plan has been approved. The pre- or

registered apprenticeship sponsor works with the ODJFS ApprenticeOhio office to complete an operating plan that includes all necessary components to meet program standards for the occupation selected.

Once the ODJFS ApprenticeOhio office approves the program and operating plan, sponsors can begin recruitment efforts. The process for student apprentices to enroll in a program varies based on the sponsor's capacity.

- OhioMeansJobs.com lists registered apprenticeship sponsors, but there is a need to focus on promoting apprenticeship opportunities for high school students that are active and accepting applications.

Workgroup discussion:

For a student, the process of securing a pre- or registered apprenticeship begins with exploration. Understanding who can help, where to find information, what is available, how to apply and what is necessary to accomplish their goals are the first steps for the student. Schools also are a vital component of the process. They are the student's support system and connection to the apprenticeship sponsor. Multiple gaps and obstacles were identified that impede students, schools and businesses from engaging in apprenticeships. Most obstacles and gaps center around the application process.

As stated previously, there is no state-mandated process for students to apply for an apprenticeship. Schools and sponsors have the flexibility to develop a local application process for students interested in an apprenticeship. The agencies strongly recommend that the process should be developed collaboratively between the school, career technical planning district, regional industry sector partnership and business advisory committee. This will ensure all schools within the area create similar operating plans with each local employer. Based on feedback, the agencies believe flexibility is key to addressing specific local industry demand as well as the diverse typography of school systems within the state. However, additional state support is needed to address barriers to increase the number of students and opportunities to participate.

INCREASE VISIBILITY OF AVAILABLE PRE-APPRENTICESHIPS

Most schools with pre-apprenticeship programs have supports in place for students to connect with available registered apprenticeships. However, not all schools across Ohio have programs or supports in place to assist students from the beginning to the end of the application process. One of the existing statewide tools for schools and students is OhioMeansJobs.com. The platform provides a linkage to the ApprenticeOhio Program Search for available registered apprenticeships. To further assist schools and students in finding available apprenticeships, the agencies propose the following recommendations be adopted as part of OhioMeansJobs.com to increase accessibility for all students as they begin the student process.

Recommendation 4: Add pre-apprenticeship postings to OhioMeansJobs.com to increase the visibility of opportunities available to students.

Recommendation 5: Attach an apprenticeship application to each OhioMeansJobs.com posting to save time in the process.

Recommendation 6: Provide a link to ODE's apprenticeship webpage on each pre-apprenticeship posting on OhioMeansJobs.com. The ODE has developed tools and resources to assist schools, students, caregivers and businesses through the application process. ODE's staff contact information is listed to provide further support.

Recommendation 7: Increase awareness of apprenticeship postings on OhioMeansJobs.com and ApprenticeOhio through marketing campaigns to schools, businesses and community organizations that engage with students.

APPLICATION PROCESS

While there is no uniform student process to apply for an apprenticeship, the existing process for a sponsor to gain program approval presents a more pressing concern. Currently, program sponsors work with the ODJFS ApprenticeOhio office to complete an operating plan for approval. Both business and education stakeholders have expressed frustration with the length of time it takes to receive feedback on operating plans and approval of apprenticeship program applications. Applications are labor-intensive with sponsors manually filling out each section of the operating plan with limited guidance. Once submitted via email, ODJFS ApprenticeOhio staff review and provide technical assistance to ensure compliance. This process is sometimes cumbersome, which discourages potential sponsors. An adverse effect is that both students and apprenticeship sponsors withdraw from the application process. With employers believing that the application process is too long or difficult, schools also will find it difficult to identify sponsors. Therefore, the following changes are proposed to address barriers in the application process for students and businesses.

Recommendation 8: Create an electronic submission portal to streamline the apprenticeship application approval process. Each stakeholder (student, school, career technical planning district, sponsor, employer, parent or guardian [if student under age 18], post-secondary institution) in the application process would receive access to the portal and be assigned, by ODJFS, a numerical identifier. The electronic submission portal should include the following:

i. The pre-apprenticeship program should be developed in a collaboration between the sponsor, affiliated schools, the lead district of the career technical planning district and the local business advisory council (see section C. *Approval and Evaluation* for components of a quality pre-apprenticeship program). A signature approval section should be included for the career technical planning district designee, program school designee and pre-apprenticeship sponsor designee. To reinforce this partnership, the pre-apprenticeship program application cannot be submitted without all party's signature authority.

ii. The program application submission portal would include a tab for ODJFS ApprenticeOhio staff to communicate feedback, request revisions and submit inquiries to applicants.

iii. Stakeholders in the application process would complete the revisions and resubmission within the original application.

iv. Once the pre-apprenticeship program application is approved, students will have the opportunity to apply. Each stakeholder in the application process would have access to the application and student profile and the ability to track the application throughout the approval process and the student post-completion outcome.

v. Collect and track student data including but not limited to demographic, graduation, college credit, post-placement (such as transition to registered apprenticeship, enrollment in post-secondary education or employment) and number of pre-apprenticeship program hours completed.

vi. Collect business demographic data.

vii. Collect name of entity providing related technical instruction, number of hours of instruction, instructor credentialing or experience in related area and other data that provides information regarding quality of instruction.

viii. The portal would encompass use for pre-apprenticeship but interface with RAPIDS so that the student record would be available from pre-apprenticeship to registered apprenticeship.

ix. Employers and sponsors would submit applications for registration as an apprenticeship provider.

ACCESS TO TRANSPORTATION

As prescribed in policy, the pre-apprenticeship operating plan must include a description of community partnerships that provide support services and resources, such as transportation, for meeting a student's practical needs during the apprenticeship. The plan also must ensure participant referral to a relevant OhioMeansJobs Center for access to services that may facilitate preparation for registered apprenticeship

Ohio | Department of Education

training. The provider is asked to coordinate with the center on a strategy for information sharing, to streamline services for pre-apprenticeship participants.

However, access to transportation from school or home to a worksite continues to be a huge barrier to student participation in apprenticeships. Students may not have access to school transportation, a private vehicle or have secured a driver's license. In many cases, students cannot begin the application process without ensuring transportation is available. With guidance from the external stakeholder workgroup, the agencies recommend developing an electronic resource for students as described below:

> **Recommendation 9:** Create a comprehensive database of state and local support services for schools and students. The database should contain a searchable list of funding sources and free and low-cost programs that provide many wraparound services including assistance in transportation for students. Transportation assistance should incorporate driver's education classes and community organization ride share options, especially in areas where there is no public transit system.

> **Recommendation 10:** Develop the database in collaboration with OhioMeansJobs to expand upon existing resources and to ensure there is no duplication of work.

EQUITABLE APPLICATION PROCESS

Based on feedback from the external stakeholder workgroup, the agencies maintain that the student application process for apprenticeships should remain locally controlled by the school. They also believe that equitable access for students should be an important component when evaluating a school's adopted process. Accordingly, the following are recommended to support an equitable application process:

> **Recommendation 11:** The application process established by a local district or chartered nonpublic school should not limit student participation that would have the effect of disproportionately excluding students of a particular race, color, national origin, sex or disability.

> **Recommendation 12:** Provide equal access to student support for completing the application process or related technical instruction to any student interested in participating in an apprenticeship. The student must be enrolled in a public high school or chartered nonpublic high school.

> **Recommendation 13:** Require pre-apprenticeship programs to report their equitable application process in the new application portal. The data will be assessed to identify gaps and provide feedback through the application approval process. The data collected should be disseminated to the education community for developing best practices, improving program quality and creating equitable access for students.

C. APPROVAL AND EVALUATION

Description of current approval and evaluation:

Pre- and registered apprenticeship programs are submitted to ODJFS ApprenticeOhio office for approval.

- Pre-Apprenticeship: An operating plan for each program must be approved by ODJFS and are not individual to students.
  - Pre-Apprenticeship Completion Certificates are issued upon request (requesters must be listed on the Operating Plan).
- Registered Apprenticeship: Registered apprenticeship program agreements (standards of apprenticeship) must be approved by ODJFS and are not individual to apprentices.
  - Sponsor/provider reports completion of an apprenticeship (Registered Apprenticeship Partners Information Database System (RAPIDS) system; certificate issued by USDOL).
  - Progress is evaluated by the sponsor, time, or competency-based apprenticeships.
- The ODJFS ApprenticeOhio office monitors approved, registered apprenticeship programs by based on the program standards a year after initial registration and no less often than every five years.

- Pre-apprenticeship programs are monitored based on the operating plan; however, a standardized schedule has not been developed.

Workgroup discussion:

Quality pre-apprenticeship programs can play a valuable role in providing work-based learning to help students prepare for an entry-level registered apprenticeship. While pre-apprenticeship programs have varied designs and approaches, Ohio has outlined the elements of a quality pre-apprenticeship program that can place an individual on a potential career pathway to employability through a registered apprenticeship. Per the Employment and Training Administration at the U.S. Department of Labor, components of a quality pre-apprenticeship program include:

- Approved Curriculum - Training that is based on industry standards and approved by a registered apprenticeship partner.
- Simulated Experiences - Hands-on training opportunities.
- Facilitated Entry - Agreements with registered apprenticeship sponsors that allow program participants to enter directly into a registered apprenticeship.
- Increased Diversity - Recruit and prepare underrepresented populations to be successful in a registered apprenticeship.
- Supportive Services - Wrap-around services or referrals to help participants complete the program such as access to transportation.
- Sustainable Partnerships - Collaboratively promote registered apprenticeship to other employers.

PROCESS FOR APPROVAL

A high school pre-apprenticeship program is a collaborative partnership between a school and registered apprenticeship sponsor that provides students with exposure to the work environment. However, the first step a school must take is to develop a Recognized Pre-Apprenticeship Operating Plan, which is the desired plan to deliver basic technical and job readiness skills to pre-apprentices that consists of several content requirements including:

- Identifying the industry cluster(s) that supports the needs of a local area and pre-apprentices;
- Determining the related coursework for each industry cluster;
- Seeking registered apprenticeship partners to form linkages to support the pre-apprenticeship; and
- Completion of a Statement of Collaboration Insert by the registered apprenticeship sponsor.

Beyond these provisions, the school and sponsor have flexibility to develop the pre-apprenticeship program to meet local needs. A student wishing to participate in a school's approved pre-apprenticeship program would seek to enroll and meet the school's locally established eligibility conditions.

Flexibility provided in the current student pre-apprenticeship approval process, which is designed locally, should continue as the model moving forward. Barriers identified lie more with submission to become an approved pre-apprenticeship provider and lack of the ability to track student data rather than the student approval process. The amount of time it takes for the application to move through the approval process and communication were also identified as gaps in the student process to secure an apprenticeship. Adopting the proposed changes to the apprenticeship application process, notably a new application portal, will address these obstacles.

If a student's school does not have an approved Recognized Pre-Apprenticeship program, the student may still directly apply to a registered apprenticeship program. OhioMeansJobs.com maintains a list of registered apprenticeships.

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METHOD OF EVALUATION

The SB 135 External Stakeholder Workgroup listed lack of quality and uniformity across existing high school pre-apprenticeship programs as the most notable gaps in evaluation. Several factors including program design, instruction of related technical content and specific requirements and components of each occupational pathway influence quality. Schools and businesses should always consider the role that each apprenticeship stakeholder plays in advancing quality programming. Eliminating barriers to advancement and mobility, particularly for apprentices from historically underserved and marginalized groups, should always be part of program quality.

To become the sponsor of a registered apprenticeship, there is a stringent application evaluation and approval process. In turn, a recognized pre-apprenticeship program must be linked to a registered apprenticeship *and* receive approval of a Recognized Pre-Apprenticeship Operating Plan. There are also educational benefits tied to student pre-apprenticeships. Examples include:

- Pre-apprenticeship curricula for high school students is developed in collaboration with ODE and aligned to industry standards;
- High school students who complete a recognized pre-apprenticeship program are eligible for 12 points of industry-recognized credentials toward their high school graduation requirements; and
- Knowledge gained through related technical instruction and on-the-job training can lead to earning additional industry-recognized credentials, making a student more employable and eligible for higher-wage positions.

Creating a method to evaluate the quality of a student's apprenticeship once they begin training has been challenging. The quality of a pre-apprenticeship operating plan can be evaluated on the front end through the application process. However, there is no guarantee that the related technical instruction and the variables in requirements and components of each occupational pathway can all be of the same high quality in all programs across the state. Whether a student is enrolled in a recognized pre-apprenticeship through their school, or their school does not have a recognized program, all students deserve the same quality opportunity. The following elements are recommended to address evaluating the quality of student apprenticeships:

Recommendation 14: Add quality of related technical instruction to the apprenticeship application evaluation and approval process. Within the newly proposed application portal, create a tab for collecting the information for the entity providing related technical instruction, number of hours of instruction that will be provided, instructor's credentialing or experience in related apprenticeship area and other data that provides information regarding quality of instruction.

Recommendation 15: Ohio registered apprenticeship programs are subject to compliance review provided by ODJFS and should also be applied to pre-apprenticeship programs.
- Timeline as recommended by ODJFS;
- In the event of non-conformity with the program's standards; and
- At the request of the sponsor.

Recommendation 16: Within the proposed new electronic submission portal, create a section for program monitoring and evaluation. Goals would be set using the approved application and partnership agreement.

Recommendation 17: Within the proposed new electronic submission portal, create a section for evaluation of student performance. Employers would be able to answer questions related to technical skill attainment of required competencies and occupational proficiency when transitioning from pre-apprenticeship to registered apprenticeship.

Recommendation 18: Include a signature approval section for the career technical planning district designee, program school designee and pre-apprenticeship sponsor designee. To reinforce this partnership, the pre-apprenticeship evaluation must not be submitted without all party's signature authority.

Ohio | Department of Education

Recommendation 19: Increase resources available for monitoring programs, completing evaluations and providing technical assistance for improving program quality. Resources should include the new proposed electronic submission portal and extensive database of wrap-around services available at state and local levels.

D. NUMBER OF HOURS

Description of current number of hours for pre-apprenticeship and apprenticeship programs:

The number of hours for a pre-apprenticeship varies based on the instructional content for each program.
- Labor laws apply, no other statewide restriction.

The number of hours for a registered apprenticeship program varies based on the occupation selected by the Registered Apprenticeship sponsor.
- Minimum hours for a registered apprenticeship program are 2,000 work hours per year but can exceed that number based on employer need.

Workgroup discussion:

There is a delicate balance between meeting the needs of both small and large businesses and working around the scheduling demands of high school students. The current pre-apprenticeship model allows schools and businesses the flexibility to develop the program around the capacity of the business and the educational considerations of the student. Apprenticeship hours may be completed before, during and after the school day, on weekends and over the summer months.

Programs can vary in length depending on the skill level of the occupation, resources available to the employer sponsor and the apprenticeship model. Pre-apprenticeship programs can range from 10 to 250 hours or more. Apprenticeships can also have various design models. The U.S. Department of Labor provides that apprenticeship programs can be customized to meet the needs of business and the skills of apprentices using any of the design models listed below:
- In time-based programs, apprentices complete a required number of hours in on-the-job training and related instruction;
- In competency-based programs, apprentices progress at their own pace – they demonstrate competency in skills and knowledge through proficiency tests but are not required to complete a specific number of hours; and
- In a hybrid approach, programs use minimum and maximum range of hours and the successful demonstration of identified and measured competencies.

WEEKLY NUMBER OF HOURS

With limited resources, small and midsized companies are often challenged to implement apprenticeship programs. Based on feedback from the external stakeholder workgroup, the agencies maintain that flexibility to set the number of weekly hours should remain at the local level to ensure all businesses, regardless of size, can participate in an apprenticeship program and that each individual student's educational requirements are met. Several factors can impact the number of weekly hours a student is able to complete. The number of hours can vary depending on the time of year and student, business and school schedules. Because there are many variables to consider when setting the number of hours for a pre-apprenticeship, please consider the following recommendation.

Recommendation 20: Provide flexibility to schools and businesses in setting a student's weekly hours around the capacity of the business and the educational considerations of the student through local program design.
- Programs must ensure alignment with applicable Ohio Minor Labor Laws.
- Priority must be given to students' educational needs   when designing programs.

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TOTAL NUMBER OF PROGRAM HOURS

SB 135 requested consideration be given to a limitation on the number of hours *per week* a student may work in an apprenticeship. However, when discussing the number of weekly hours, the external stakeholder workgroup raised concern over insufficient guidance in the total number of program hours required for students in pre-apprenticeships. The absence of an industrywide standard for length of time to complete educational hours combined with on-the-job training hours and variables in program design have caused a lack in uniformity and quality in pre-apprenticeship programs. To address these concerns, the agencies recommend a competency-based approach rather than a set total number of hours.

> **Recommendation 21:** To strengthen the quality of programs and increase equitable opportunities for students and businesses, the registered apprenticeship competency-based training approach should be used for pre-apprenticeship program design[1]. The competency-based model focuses on the apprentice's ability to demonstrate competencies in an observable and measurable way. This model provides an employer with a way to determine whether the apprentice is gaining competency. It also allows the apprentice to move through the related technical instruction upon mastery, rather than being bound to a minimum number of program hours. This approach can offer needed flexibility for employers and program sponsors and provide a way to determine if apprentices have truly acquired the skills and competencies required for the job[2].
> - Competencies should be identified and defined through a valid occupational or job task analysis method and directly related to the occupation and the on-the-job learning.
> - Related instructional coursework should provide apprentices with the technical, workplace and knowledge competencies that apply to the job.
> - The program standards should address how on-the-job learning will be integrated into the program, describe competencies and identify an appropriate means of testing and evaluation for such competencies.
> - Measures or tests of competency attainment and demonstrated skills performance should be developed collaboratively between the school and sponsor and should be observable, repeatable and agreed to in advance.
> - The sponsor should verify the apprentice's successful demonstration of acquired skills and knowledge.
> - The program should be self-paced with open entry and exit design, which enables apprentices to accelerate the rate of competency achievement or extend the term of training to meet performance-based completion requirements.

As schools design pre-apprenticeship programs and develop apprentice agreements with employers, they are strongly encouraged to consider the benefits to students who complete 250 hours. Beginning as early as grade 9, students may begin accumulating 250 hours of work-based learning aligned to their career-technical education programs of study or their student success or graduation plans. The number of hours may accrue across multiple types of work-based learning experiences, one of which is apprenticeship. The information below provides guidance for schools when considering work-based learning.

- Students who complete 250 hours of work-based learning can satisfy multiple parts of their graduation requirements through alternative competency demonstration. Two of the alternative demonstrations of competency in Career Experience and Technical Skill are completion of a recognized pre-apprenticeship program and completion of 250 hours of work-based learning. Completion of a recognized pre-apprenticeship program is also considered a 12-point industry-recognized credential; earning a 12-point credential(s) is another foundational alternative

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[1] Tooling U-SME's 2016 Modernizing a Proven Workforce Development Strategy white paper presents case studies for competency-based registered apprenticeship in Ohio.
[2] The U.S. Department of Labor's Circular 2016-01 provides guidelines for competency-based, hybrid and time-based apprenticeship training approaches.

Ohio | Department of Education

demonstration of competency and would also help the student earn the Industry-Recognized Credential Seal.

- Students in work-based learning experiences may be eligible for school credit. Credit can be issued by enhancing current courses with work-based learning experiences or by using the local district's policy on credit flexibility to award credit. Students can learn subject matter and earn course credit in ways not limited to "seat time" or the confines of a school building. Credit flexibility provides equitable access to various course options to all students throughout the state of Ohio.

E. COST TO BUSINESSES

Description of current cost to businesses:

The cost to business varies based on the industry and occupation selected.
- The U.S. Department of Commerce and U.S. Department of Labor uses a return-on-investment calculator for interested sponsors and businesses.
- Registered apprenticeship and the Workforce Innovation and Opportunity Act (WIOA)[3].
  o Registered apprenticeship sponsors are automatically "eligible training providers" and registered apprentices can be eligible for individual training accounts served through WIOA or the Comprehensive Case Management and Employment Program (CCMEP).

Workgroup discussion:

Research was conducted first focusing locally then expanded nationwide to determine which business costs should be considered and best practices used to calculate costs that businesses incur when employing student apprentices. Over the course of the search, it became clear that most of the tools that exist for determining the cost of pre- and registered apprenticeships are return-on-investment calculators. While SB 135 does not request calculating the return-on-investment for businesses, the tool could still be useful for both calculating cost and providing justification for businesses to participate in apprenticeship programs. Out of only a handful of calculators that were found, three were explored due to ease of use, diverse costs used in the calculation and readability of the reports.

The first was developed by the Colorado Advanced Manufacturing Association in collaboration with CareerWise Colorado. The CareerWise Apprenticeship Cost-Benefit Analysis return-on-investment calculator was created to help companies make informed decisions regarding their participation in *pre-apprenticeship* programs. The calculator is used to predict the net financial impact a given pre-apprenticeship program will have on a business.

The second return-on-investment calculator, developed by the Oregon Apprenticeship, is a tool that businesses can use to explore registered apprenticeship program options and associated costs and benefits. The intent is to turn rough concepts into dollars and discover why registered apprenticeship is worth the investment.

The third calculator is used by U.S. Department of Labor to calculate apprenticeship return-on-investment. The tool is a downloadable spreadsheet that calculates the potential return-on-investment for an apprenticeship. The calculation considers the costs and potential benefits of an individual program over the number of years the employer anticipates an average apprentice to remain with their company. The tool also provides an analysis of the cost of apprenticeship recruitment and training to compare the benefits and costs of hiring a regular employee versus an apprentice. While the other calculators use state-specific tax rates, this tool does not. The resulting benefit is that it can be used by an employer from any state.

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[3] The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014. WIOA is designed to help job seekers access employment, education, training and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. Employers can draw on WIOA funding to support apprenticeship.

Ohio | Department of Education

Another beneficial resource was a case study report published in 2016 by the U.S. Department of Commerce in conjunction with Case Western Reserve University titled, The Benefits and Costs of Apprenticeship: A Business Perspective. They examined 13 businesses and nonprofit intermediaries from a variety of occupations and regions, most from the U.S. Department of Labor's LEADERs program[4]. The goal of the study was to understand the motivation for beginning apprenticeship programs and analyze the underlying reasons businesses continue the programs. Businesses were asked about their drive to create apprenticeships, the costs and benefits, and, if not using apprentices, what other options were used to fill workforce needs.

Ohio businesses concurred with the case study that the retention rate of apprentices is greater out of the various avenues used to hire workers. Two employers indicated that retention of career center students is around 50-60% while workers hired through other recruitment efforts such as staffing firms is about 20%. One employer further stated that the trades employed at their company can be physically and mentally demanding and additionally may require some traveling. Because instructors at the career centers establish the work expectations before beginning the apprenticeship, students know the demands required of them and still commit to completing the apprenticeship program.

Another employer commented that their pre-apprentices cost a little more because of needing to work around school commitments. The business ensures that the pre-apprentice is working as much as they can, even if the business has more employees than needed on worksites, which increases the budget. They also indicated that the biggest expenditure is for mentors with recruitment and tools being secondary costs. Liability insurance and workers' compensation charges do not really have a bearing on their pre-apprenticeship expenditures. The employer also indicated that the average cost is about $1,500-$2,000 per pre-apprentice but is worth the cost. Retention for pre-apprentices is about 50% compared to 15-20% retention of hiring someone off the street. Using staffing agencies to fill open positions does not really work. Those workers do not care about the company. The pre-apprentices that come from the career centers want to be successful at the company. Some students choose to stay while others decide that this is not the career for them.

FIXED AND VARIABLE COSTS

Some costs remain constant regardless of the number of apprentices in a program. To a large extent, these fixed costs represent the cost of initially setting up the program. Variable costs include wages and benefits, which vary based on the number of apprentices in the program and whether the employer pays pre-apprentices. Many companies pay their apprentices for on-the-job training and related technical instruction as well as apprentices' tuition, books and supplies. While Workers' Compensation premiums are fixed on an annual basis, they are established using a formula based on number of employees, number of hours worked annually and history of injuries and claims. The premium cost is more impacted by previous claims. Since the number of injuries could vary annually and entry level employees have a higher likelihood of injury, insurance and Workers' Compensation was added to the *Variable Costs* column.

Costs of Apprenticeships

Fixed Costs	Variable Costs
Curriculum development	Wages and benefits of apprentices
Equipment purchases	Time provided by mentor
Staff time spent on setup	Supplies and uniforms
Overhead and management	Tuition, books and classroom materials
Classroom space	Insurance including Workers' Compensation
Recruitment	

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[4] U.S. Department of Labor's ApprenticeshipUSA LEADERs (Leaders of Excellence in Apprenticeship Development, Education and Research) program represented a wide variety of industries including construction, manufacturing, health care, finance and retail.

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METHOD FOR DETERMINING COST

Based on national research and discussion with local businesses, the agencies recommend the following:

> **Recommendation 22:** Use the U.S. Department of Commerce and U.S. Department of Labor return-on-investment calculator as the model method to determine actual costs to Ohio businesses participating in a pre-apprenticeship program.

> **Recommendation 23:** The state should complete a more in-depth cost analysis study for pre-apprenticeships. The information gathered through further case study could also be used to develop a cost analysis tool such as a return-on-investment calculator for Ohio businesses.

F. FUNDING FORMULA

Current status of funding formula:

Pre- and registered apprenticeships do not currently have a funding formula.

Workgroup discussion:

There are several factors to consider when developing a sufficient and effective funding formula. Most notable are the variables within different apprenticeable occupations. Materials, equipment, training time, facilities and curriculum widely differ between medical assisting, computer programming and welding programs. It also is important to consider the different sizes of businesses with pre-apprentice programs. A small to midsize business with less resources is financially impacted greater than a larger firm with more capital.

However, there is money available to employers to assist with funding apprenticeship programs. Ohio's TechCred Program gives employers the chance to upskill current and future employees. Companies may be reimbursed for outlays covering tuition, lab fees, manuals, textbooks and certification costs, up to $2,000 per industry-recognized credential with a maximum of $30,000 per funding round. The list of eligible credentials includes several apprenticeships including plumbing, electrical and manufacturing. A pre-apprenticeship program also can lead to earning other eligible industry-recognized credentials in information technology, health care and business technology.

Some Ohio employers can use funds from the Workforce Innovation and Opportunity Act Youth Program to supplement wages for their pre-apprentices. Through the ODJFS Ohio Registered Apprenticeship Incentive Program, eligible sponsors or employers could be reimbursed for paid related instruction expenditures and tools up to $2,500 for each new registered apprentice for up to 10 individuals. Members of the SB 135 External Stakeholder Workgroup pointed out that most grants are short-lived and do not sustain programs long-term. Furthermore, if federal money is used to establish the grant, additional conditions may need to be met that can further burden company staff managing the program.

Many states use tax credits to help offset the cost to businesses that employ apprentices. Similarly, Ohio has developed the Tax Credit Certificate Program for Work-Based Learning Experiences. As passed in SB 166, this program allows a nonrefundable credit against a taxpayer's aggregate tax liability for a taxpayer that holds a tax credit certificate issued by ODE and employs an eligible student employee. Eligible employers may receive the lesser of $5,000 per eligible employee or 15% of wages paid to an eligible employee. Since pre-apprenticeships offer students an opportunity to participate in work-based learning experiences, employers can use this tax credit to help fund their programs. SB 166 provides additional protections for employers from higher Bureau of Workers' Compensation (BWC) premiums when employing minors[5].

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[5] SB 166 establishes the Employers Providing Work-Based Learning Pilot Program, which expires two years after the effective date of the bill, and prevents the BWC from charging against an employer's experience any amount with respect

Ohio | Department of Education

FUNDING FOR BUSINESSES

Members of the interagency workgroup contacted local area apprenticeship hubs and apprenticeship sponsors or employers regarding program costs for pre-apprentices and current funding models available to offset costs. The findings, below, were evaluated by the ODE, ODJFS and ODHE and presented to the SB 135 External Stakeholder Workgroup for further discussion.

- Based on responses provided, the average annual cost per pre-apprentice ranged from $500 to $2,500 depending on the apprenticeable occupation.
- Total annual cost to the business depended on the number of pre-apprentices, which varied from two to 18, and which apprenticeable occupation the program enrolled.
- Employers indicated that they would prefer a "flat rate" reimbursement model to offset administrative costs of managing the programs.

The following funding formula is recommended to pay businesses for costs associated with employing students enrolled in a public or chartered nonpublic high school.

Recommendation 24: Employer to an active recognized program should receive reimbursement of program costs up to $2,000 per eligible apprentice. Program costs may include any combination of the following:
- Apprentice wages and benefits;
- Insurance including Workers' Compensation;
- Time provided by mentor; and
- Overhead and management.

Recommendation 25: Define "eligible apprentice" as a pre-apprentice currently enrolled in a public or chartered nonpublic high school.

Recommendation 26: Cap reimbursement at $30,000 per employer, per state fiscal year (July 1 to June 30).

Recommendation 27: Limit each employer to one application per state fiscal year.

If the ODJFS Office of Workforce Development was to administer such a program, ODJFS would likely need to make a request to the General Assembly for additional appropriations for administration of the program as well as funding for the program.

FUNDING FOR SCHOOLS

In addition to paying businesses, consideration should be given to providing additional funding to support schools. Schools are struggling to fund full-time staff dedicated to expanding apprenticeship opportunities, developing partnerships, providing technical support to employers and connecting students with wrap-around services. A student apprentice must also be supervised by a school-to-work or job placement coordinator. For some schools, funding may not be available to hire staff devoted just to apprenticeship and instead the duties are added on to an existing staff member. There is some funding available but not enough to sustain the staffing needed for implementing high quality apprenticeship programs.

CURRENT SCHOOL FUNDING OPTIONS

Text for the most recent proposed state budget, Fiscal Years 2024 and 2025, was released in February 2023. To ensure every student is prepared for future success, budget recommendations include $300 million to launch new and innovative in-demand career-tech programs and industry-recognized credential programs across the state. Additionally, the budget recommends $52 million over two years incentivizing students to earn

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to a workers' compensation claim if (1) the employer provides work-based learning experiences for students enrolled in a career-technical education program and (2) the claim is based on a student's injury, occupational disease, or death sustained while participating in the employer's work-based learning experience.

Ohio | Department of Education

industry-recognized credentials and engage in work-based learning experiences. While the Innovative Workforce Incentive Program (IWIP) and credential reimbursement have been funded before the FY24-FY25 budget, the Work-Based Learning Incentive Program is new. Listed below are funding opportunities available to schools:

- IWIP provides schools with an incentive payment of $1,250 for each Ohio State Apprenticeship Council Recognized Pre-Apprenticeship Program Certificate of Completion industry-recognized credential reported in the Education Management Information System (EMIS)[6].
- Schools receive $50 through the industry-recognized credential reimbursement schedule for each Ohio State Apprenticeship Council Recognized Pre-Apprenticeship Program Certificate of Completion industry-recognized credential reported in EMIS.
- The Work-Based Learning Incentive Program encourages schools and businesses to offer additional work-based learning opportunities to nearly 10,000 students. The program would provide $1,000 for each student participating in at least 250 hours of work-based learning[7]. Students may accumulate hours across multiple types of work-based learning experiences, which includes pre- and registered apprenticeship programs.

PROPOSED ADDITIONAL SCHOOL FUNDING OPTIONS

Schools need staff members that are hired specifically to grow and monitor apprenticeship programs. Teachers, principals or school counselors, who already struggle with a demanding workload, must add this to their list of duties. Adding staff devoted to working with businesses, students and parents would be the most effective way to help ensure success. The following recommendations are provided as additional or alternative means to fund schools' pre-apprenticeship programs:

Recommendation 28: Significantly increase the amount reimbursed to schools for each Ohio State Apprenticeship Council Recognized Pre-Apprenticeship Program Certificate of Completion Industry-Recognized Credential reported by the school. A cost analysis should be conducted to determine the amount of allocation needed. It is important to note that the school will not receive reimbursement until early summer of the following year. Using reimbursement funds may help offset the costs for schools that already have established programs and dedicated apprenticeship staff but may not help schools that need to initially establish programs.

Recommendation 29: Establish new funding, distributed through the career technical planning district, to support apprenticeship programs. A model example is the Career Awareness and Exploration Funds[9] program. ODE could provide funds to career-technical planning districts based on the number of students at each served school and district. Each district would direct funding to schools that hire staff devoted to implementing apprenticeship programs. Strong consideration should be given to this option as it would provide schools with funding without having to carry expenditures for a full year.

G. PAYMENTS TO BUSINESSES

Current payments to businesses:

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[6] EMIS is a statewide data collection system for Ohio's primary and secondary education, including demographic information, attendance, course information, financial data, and test results.

[7] Work-based learning promotes sustained interactions with industry and community professionals in workplace settings that foster in-depth, firsthand engagement with the tasks required in a given career field, that are aligned to curriculum and instruction. Beginning as early as grade 9, students should accumulate 250 hours of work-based learning aligned to their programs of study or their student success or graduation plans, with evidence of positive evaluations.

[8] To support the implementation of a more consistent and collaborative career-focused approach to education in Ohio, House Bill 110 established funding to be used towards career awareness and exploration in each city, local, exempted village and joint vocational school district and community and STEM schools.

Ohio | Department of Education

Because there is currently no state funding for pre-apprenticeship programs, the ODJFS ApprenticeOhio office does not have a method for making payments to participating businesses in pre-apprenticeship programs.

- The ODJFS ApprenticeOhio office receives direct funding provided by U.S. Department of Labor grants. Occasionally, these grants make funds available to registered apprenticeship sponsors. Funding granted to program sponsors must meet the guidelines outlined in the award letter.

Workgroup discussion:

The method for making payments to participating businesses will depend on the funding streams utilized, the lead agency managing the program and the agency handling program funds. The lead agency would determine the agreement, terms of payment and program eligibility. If the payments are state funded, ODJFS and ODE would determine how best to coordinate payments.

> **Recommendation 30:** Businesses seeking to participate in the program should be required to provide, at minimum, the following information through the application process to be eligible to receive payments:
> - Name of employer to active Ohio State Apprenticeship Council recognized program;
> - State of Ohio OH|ID number; and
> - Federal tax identification Number.

> **Recommendation 31:** Use a proven statewide system for collecting data points from businesses. Other state agencies use platforms such as Salesforce to collect similar information from businesses applying for funding. If the state wishes to use the same or similar platform to approve and reimburse businesses for pre-apprentices, there could be an opportunity to streamline or align the process to avoid unnecessary duplication of information requested.

OHIO DEPARTMENT OF JOB AND FAMILY SERVICES

A portion of Workforce Innovation and Opportunity Act (WIOA) statewide funding allotments may be used to pay employers for pre-apprenticeship participants who are WIOA eligible or for youth who are eligible for the Comprehensive Case Management and Employment Program (CCMEP). The ODJFS Office of Workforce Development would most likely be assigned to process employer applications and would need an appropriation of state funds for the applicants with participants who are not eligible for WIOA or CCMEP.

> **Recommendation 32:** Should ODJFS be tasked with reviewing applications, a mechanism would need to be established similar to that used for the incentives under the 2020 State Apprenticeship Expansion (SAE) grant. Any use of WIOA funds or increase in ODJFS staffing and workload would require approval from OWD and agency leadership.

OHIO DEPARTMENT OF EDUCATION

Generally, ODE provides grants and subsidies to schools and districts. ODE does not have grant relationships with private employers and businesses. Instead, ODE partners with other state agencies. One example is the High School Tech Internship program, which is a competitive opportunity for Ohio employers to receive reimbursement for establishing a recruitment pipeline by hosting high school interns in tech-related roles. ODE is collaborating with the Department of Development, who will allocate the funds.

> **Recommendation 33:** ODE should partner with another state agency to issue payments directly to businesses.

H. COLLEGE CREDIT

Current status for college credit:

There is currently no uniform process for awarding college credit for participation in a pre-apprenticeship program. Individual institutions may choose to award credit based on their own prior learning assessment policies. The current process would be specific to each institution's prior learning assessment policy.

RELEVANT OHIO DEPARTMENT OF JOB AND FAMILY SERVICES POLICY

- State-Recognized Pre-Apprenticeship (WIOAPL 21-03) - This policy letter is issued as guidance to local workforce development areas (local areas), regarding the criteria for state recognition of effective pre-apprenticeship programs that prepare individuals to succeed in Registered Apprenticeship training. This information is meant to assist in the development of local area policies on the use of pre-apprenticeship training in WIOA, in the Comprehensive Case Management and Employment Program (CCMEP), in other employment and training services, and in fulfilling state standards for secondary education attainment.
- Eligible Training Providers (WIOAPL 16-02.2) - The purpose of this policy is to establish the criteria for eligible training providers (ETPs) who may receive Workforce Innovation and Opportunity Act (WIOA) funding to provide training services and the procedures for approving them on the State ETP list.
- Use of Individual Training Accounts (WIOAPL 15-11.3) - The purpose of this policy is to identify the parameters for development of a local area Individual Training Account (ITA) policy and to standardize the delivery of ITAs so local workforce development areas (local areas) consistently provide training opportunities to participants leading to employment in an in-demand occupation or critical job.

Workgroup discussion:

Apprenticeships are one of the many pathways that lead to a successful career. For some students, they are a great alternative to traditional college education while other students choose to turn previous work experience gained through apprenticeships into a degree. There are methods in place for an institution of higher education (IHE) to award college credit for learning gained through an apprenticeship.

> **Recommendation 34:** Schools and employers should engage with their local institution of higher education when designing a pre-apprenticeship program. Each IHE determines whether learning achieved after completing an apprenticeship is appropriate for college credit.

CREDIT FOR PRIOR LEARNING

One method Ohio colleges and universities have adopted provides a path to earning college credit for what students have already learned and achieved. This pathway is called credit for prior learning (CPL).

CPL encompasses a broad array of methods that colleges and universities can use to evaluate learning that has occurred outside of the traditional academic environment. It is used to grant college credit, certification or advanced standing toward further education or training. Credits earned through CPL are connected to learning outcomes. CPL awards credit for college-level learning (knowledge, skills and competencies) that students have obtained because of their prior learning experiences. CPL includes several methods of evaluation, some are listed below, including credit by portfolio and evaluation of non-credit instruction.

- Credit by portfolio is a category of CPL in which students develop a summary of their learning experiences outside the traditional classroom that is then assessed by the college or university to determine whether academic knowledge and skills mapped to course learning outcomes have been acquired. ODHE's Prior Learning Assessment with a Purpose initiative provides training resources to institutions looking to initiate or expand their use of credit by portfolio.

- Evaluation of non-credit instruction assesses prior training encountered by students in non-higher education settings and provides recommendations for credit articulation. Individual colleges and universities also conduct their own program evaluations of non-credit instruction, including evaluations of apprenticeship training often conducted in collaboration with trade associations.

Ohio | Department of Education

INDUSTRY-RECOGNIZED CREDENTIAL TRANSFER ASSURANCE GUIDES

Ohio provides a statewide guarantee around some forms of CPL, specifically credit for some aspects of educational experiences completed at Career and Technical Centers and attainment of industry-recognized credentials. These guarantees are codified in Career-Technical Transfer Assurance Guides (CTAGs) and Industry-Recognized Credential Transfer Assurance Guides (ITAGs)[9]. Of these, ITAGS are particularly relevant to the issue of awarding credit for knowledge gained when a student earns an industry-recognized credential. Many apprenticeship programs provide the opportunity for students to earn credentials. On-the-job training and related technical instruction can equip students with the knowledge necessary to pass credential assessments. The school must report that the apprentice earned the industry-recognized credential, and the credential must be on the approved ITAG list. To earn the credit, the student would need to enroll in an institution that offers the course(s) that the ITAG confers.

ITAGs are a statewide transfer initiative that guarantees the award of college-level credit to students earning agreed upon industry-recognized credentials. The award of credit is based upon the knowledge, skills and competencies gained through credential attainment regardless of where the learning to prepare for the credential took place. Credential attainment provides a demonstration of technical skills achieved.

CHALLENGES IN AWARDING COLLEGE CREDIT

Because there is frequently a lack of alignment between knowledge, skills and competencies earned through apprenticeships and the learning outcomes and objectives of college courses, credit may be awarded inconsistently. Therefore, the agencies propose additional considerations, listed below, when determining if college credit should be awarded for work completed through an apprenticeship. The following considerations should be optional but deemed best practices:

- Create an apprenticeship steering committee comprised of businesses, school and career technical planning district staff involved in the apprenticeship process and any post-secondary partners that would be conferring credit for learning occurring during the apprenticeship. Post-secondary partners that grant credits and degrees should work closely with industry partners to ensure alignment between courses and the workplace skills required for success. Post-secondary partners should work with district staff to develop or identify assessments to evaluate whether a student's learning is sufficient to award credit.

- When developing curriculum, it is important to note that an effective pre-apprenticeship curriculum must include hands-on and personalized coursework aligned with district, state and federal standards. Additionally, high school courses must be aligned with both industry-credentialing requirements and the preparation of students for success in post-secondary education related to their field of professional study.

- Use school business advisory councils to communicate and promote, directly to students, the opportunity to earn college credit through ITAGS and which pre-apprenticeships offer credentials from the approved ITAG list.

- Employers should be encouraged, when applicable, to include a statement that there is an opportunity to earn college credit through ITAGS when they post pre-apprenticeship openings.

- Add signature authority for post-secondary partners to apprenticeship agreements[10]. Post-secondary partners would be attesting that the curriculum, as written, would provide the student with the instruction necessary to succeed in an evaluation of learning.

- To achieve uniformity in awarding college credit, there must be an evaluated demonstration of college level work that leads to a statewide articulation agreement.

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[9] Ohio Administrative Code 3357:15-13-25 provides the state of Ohio's transfer and articulation policy including institutional transfer and application of transfer and articulated credit.

[10] An apprenticeship agreement is an individual written agreement between a sponsor and an apprentice, which provides that the apprentice will receive training and work experience in accordance with specific occupation standards. The agreement is typically signed by the employer sponsor, the apprentice, and, if the apprentice is a minor, by a parent or guardian. It is valid only when approved by the ApprenticeOhio office at ODJFS and constitutes registration of the apprentice.

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Conclusion

SB 135 brought together a diverse group of stakeholders representing government, labor, employers and education. The group was unified by one common goal - to ensure high school students have the opportunity and access to apprenticeship programs with a pathway to employment or post-secondary education. By leveraging combined resources and expertise, multiple barriers and gaps impacting students, employers and schools were identified. Most of the areas identified were logistical in nature.

The state agencies and external stakeholders who developed this proposal have laid out possible solutions to impediments to lessen the burden on schools and businesses and improve opportunities for students. Schools have the flexibility to design programs to individually meet the needs of high school students and local businesses. In turn, businesses can invest in their current and future workforce while providing students additional opportunities to flourish in their future careers.

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APPENDIX A: Workgroup Members

SB 135 Interagency Workgroup Members

Leah Amstutz
Director
Ohio Department of Education - Office of Career-Technical Education

Brenna Bartlett
Assistant Director
Ohio Department of Education - Office of Career-Technical Education

Nick Derksen
Director
Ohio Department of Higher Education - Legislative and External Affairs

Amy Dumbaugh
Project Manager
Ohio Department of Job and Family Services - Office of Workforce Development

Holly Endicott
Program Administrator
Ohio Department of Job and Family Services - Office of Workforce Development

Martin Ginnan
Assistant Legal Counsel
Ohio Department of Education - Office of Chief Legal Counsel

Patti Guseman
Program Administrator
Ohio Department of Education - Office of Career-Technical Education

Chris Kacir
Associate Vice-Chancellor
Ohio Department of Higher Education - Student Success

Jennie Stump
Director
Ohio Department of Education - Office of Policy and Legislative Affairs

Emily Turner
Director
Ohio Department of Higher Education - Choose Ohio First Scholarship

Matt Winkle
Associate Director
Ohio Department of Education - Office of Career-Technical Education

SB 135 External Stakeholder Workgroup Members

Keith Banner
Community Life Engagement Team State Lead
Ohio Department of Developmental Disabilities

Jeff Berk
Assistant Principal and Career Technical Director
Stebbins High School - Ohio Association of Comprehensive and Compact Career-Technical Schools

Jason Haak
Superintendent
Upper Valley Career Center - Joint Vocational School District

Todd Herman
Superintendent
Noble Local School District - Buckeye Association of School Administrators

Dean Hobler
Provost, College of Business, Health and Occupational Professions
University of Northwestern Ohio - Association of Independent Colleges and Universities of Ohio

Shannon Komisarek
Assistant Deputy Director
Opportunities for Ohioans with Disabilities

Michael McLean
Executive Director
Ohio Grants Alliance

Toby Prinsen
Assistant Director
Apollo Career Center - Ohio Technical Center

Terri Sandu
Director, Talent and Business Innovation
Lorain County Community College - Ohio Association of Community Colleges

Maurice Stevens
Principal
Career Development and Placement Strategies

David Tomasko
Associate Dean, College of Engineering
The Ohio State University - Inter-University Council of Ohio

Tony Trapp
School-To-Apprenticeship Coordinator
Upper Valley Career Center - Joint Vocational School District

John Trott
Executive Director
Clark State College - Greater Ohio Workforce Board

Will Vorys
Legislative Counsel
Ohio Association for Career and Technical Education

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SB 135 Interagency Subject Matter Experts

Jennifer Carson
Senior Director
Ohio Department of Higher Education - Audit and Compliance

Fred Church
Vice Chancellor
Ohio Department of Higher Education - Finance and Data Management

Paula Compton
Associate Vice Chancellor and Executive Director
Ohio Department of Higher Education - Articulation and Transfer for College Credit

Becky Harr
Director
Ohio Department of Higher Education - College Credit Plus

Rachel Johanson
Policy Director
Ohio Department of Job and Family Services

Aaron Rausch
Chief of Budget and School Funding
Ohio Department of Education

Ben Sullivan
Grants Administrator
Ohio Department of Job and Family Services - Office of Workforce Development

Graham Wood
Interim Director
Ohio Department of Education - Office of Graduate Success

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