

Registered Apprenticeship Program Policy #P-18-6.22

Date: January 31, 2024

Re: Guidance on using WIOA/TANF grant dollars to fund on-the-job learning, classroom instruction, and occupational skills training for registered apprentices and pre-apprentices eligible for WIOA/TANF services.

Approved: August 4, 2022
Recent Revision: January 31, 2024
Revision Approved: February 8, 2024

References: TEGL 13-16, Change 1
TEGL 19-16
29 USC 50 et seq
34 Pa. Code § 83.5
50 Stat. 644, Chapter 663
WIOA Section 134(d)(1)(A)
20 CFR § 680.330
20 CFR § 680.470
20 CFR Par§ 681.480

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Relevant SCPa Works Policy References: ON-THE-JOB TRAINING (OJT) #P-15-2.22
INDIVIDUAL TRAINING ACCOUNT (ITA) #P-17-2.22
INCUMBENT WORKER TRAINING #P-8-5.22
WORK EXPERIENCE #P-16-5.22
SUPPORTIVE SERVICES #P-7A-1.22

I. Purpose:

- A. This policy provides guidance on the utilization of Title I WIOA/TANF funding resources available to support Registered Apprentice Programs (RAP) and Registered Pre-Apprenticeships (Pre-RAP) within the SCPa Works service area through partnership and engagement with employers and program sponsors that carry out workforce development programs registered under the Act of August 16, 1937, the National Apprenticeship Act, 50 Stat. 644, chapter 633; 29 U.S.C. 50 et seq.
- B. This policy includes guidance on incorporating multiple WIOA/TANF funding options to offset the costs associated with RAP and Pre-RAP opportunities directly related to RAP. WIOA/TANF funding integration can include, but is not limited to:
 1. The use of WIOA OJT funds for RAP on-the-job learning;
 2. The use of WIOA ITA funds for RAP Related Technical Instruction (RTI);
 3. The use of WIOA, or non-WIOA funds, for Incumbent Worker Training (IWT) within RAP;

4. The provision of WIOA/TANF Supportive Services funds for eligible RAP/Pre-RAP participants; and
5. Integrating WIOA/TANF-funded and non-WIOA/TANF-funded Youth program education and occupational skills training services for Pre-RAP.
6. The use of PWE funds for eligible WIOA Adults and Dislocated Workers (DW) provides 12 weeks of paid work for an employer to determine whether a participant is a good fit for a Registered Apprenticeship Program or to upskill an individual who needs to acquire skills to enroll in a RAP.
 - a. PWE funding is capped at \$3000.
 - i. This amount is deducted from the WIOA Adult/DW lifetime maximum of \$7500.00.

II. Background:

- A. A Registered Apprenticeship Program (RAP) is:
 1. An effective evidence-based workforce model to train individuals for long-term, sustainable careers; and
 2. A proven method of providing a job-driven strategy for employers and local industries.
- B. Pre-RAP provides a set of strategies designed to prepare an individual for entry into RAP or other industry-related job opportunities.
- C. RAP is a business-driven training model specifically designed for job preparation within a skilled trade through which employers develop skilled workers engaged in on-the-job learning specific to the needs of in-demand industries.
- D. Through a collective engagement among employers, institutions of higher education, and policymakers, RAP has evolved into an extraordinary opportunity for the workforce system to expand Pennsylvania's business base by offering employers highly skilled workers and a strategic approach to talent development.

III. Definitions:

- A. DOL: United States Department of Labor
- B. DW: An individual who is eligible for WIOA services under the Dislocated Worker program.
- C. WIOA Adult/DW: Indicating the WIOA Adult and/or Dislocated Worker programs.
- D. New Apprentice: A new apprentice is an individual who does not have an Apprenticeship Agreement with a Registered Apprenticeship Program at the time of initial workforce program intake.
- E. Registered Apprentice: An individual employed by a Registered Apprenticeship Program who has signed the formal, DOL-issued, Apprenticeship Agreement with the employer or the sponsor. The Apprenticeship Agreement indicates that the individual is enrolled in a Registered Apprenticeship Program.
- F. Apprenticeship Agreement: A contract between the apprentice and the employer or employer sponsor.
- G. RAP Participant: An individual eligible for WIOA-funded services within the SCPa Works service area and who is also a Registered Apprentice under a signed Apprenticeship Agreement with a Registered Apprenticeship Program.
- H. Postsecondary: A level of education, training, or vocational trade instruction that follows the successful completion of secondary education, the receipt of a high school diploma, or the acquisition of a GED high school equivalency diploma or certificate of GED program completion.
- I. Employer Sponsor: An employer, association, committee, or organization that operates a Registered Apprenticeship Program and assumes full responsibility for the administration and operation of the RAP. Sponsors can be a single business or a consortium of businesses.
- J. Journey worker: A worker who has attained skills, abilities, and competencies recognized within an industry as having mastered the skills and competencies required for the occupation.

- K. ATO: - Apprenticeship and Training Office (Pennsylvania Department of Labor and Industry) guides and promotes the expansion of apprenticeship programs across Pennsylvania.
- L. ATR: Apprenticeship Training Representative, staff that assists partners in developing and registering apprenticeship programs.
- M. SAA: - The State Apprenticeship Agency oversees the development and approval of apprenticeship programs.
- N. PATC: - Pennsylvania Apprenticeship and Training Council approves or denies proposed apprenticeship programs
- O. Paid Job: - Apprentices are paid employees who produce high-quality work while they learn skills that enhance their employers' needs.
- P. On-the-Job Learning: - Develops skilled workers through structured learning in a work setting and can be subsidized through a WIOA/TANF-funded OJT.
- Q. Classroom Learning or Related Technical Instruction (RTI): - Improves job-related skills through education in a classroom setting, virtual or in-person, and can be subsidized utilizing WIOA/TANF ITA funds.
- R. Mentorship: - Provides apprentices with the support of a skilled worker to assist and enhance critical hands-on learning.
- S. Pre-Apprenticeship: Pre-Apprenticeship is for participants eligible for WIOA/TANF and engagement in Pre-Apprenticeship activities; however, Pre-Apprenticeships must meet the requirements below.
 1. A Pre-Apprenticeship is a hands-on, instructional-based learning program partnered directly with a Registered Apprenticeship Program and serves as a feeder program into the Registered Apprenticeship Program.
 2. Schools can develop and administer pre-apprenticeships but must directly correlate with a specified Registered Apprenticeship Program.
 3. Schools or entities that house Pre-Apprenticeship programming will have completed a **Pre-Apprenticeship Application for Approval of Standards of Apprenticeship** that is kept on file at the PA ATO.
 4. Pre-Apprenticeship programs will have completed a **Pre-Apprenticeship Pathway** document, listed as **Appendix A on the PA ATO website**.
 5. Pre-Apprenticeship programs will have proof of completing a detailed **application and interview process with an ATO Representative** to be accepted and referred to as a registered Pre-Apprenticeship program.
 6. Pre-Apprenticeship employers or training programs will have a copy of the **signed Pre-Apprenticeship Agreement** and the signed **Pre-Apprenticeship Regulation Requirements** on file to provide source documentation proof of the program's validity.

IV. Elements Unique to Funding RAP with WIOA/TANF Grants:

- A. RAPs represent in-demand occupations and do not need to be further qualified for nor included on the High Priority Occupation (HPO) list.
 1. RAPs represent actively hiring employers with in-demand industry needs, which qualifies the occupation or industry sector as in-demand, making RAPs exempt from the requirement of HPO list inclusion.
 2. RAPs reflect in-demand occupations and should be considered by WIOA/TANF vendors as operating within an in-demand industry sector.
 3. RAPs are linked to demonstrated hiring needs established by the employers and program sponsors who establish and administer the RAPs.
- B. RAP employers qualify for inclusion on the Pennsylvania Department of Labor and Industry's Eligible Training Provider List (ETPL).
 1. RAP employer eligibility is applied for and determined by the Pennsylvania Apprenticeship and Training Council (PATC).

2. RAP employers or program sponsors do not have to meet WIOA/TANF eligibility or business services requirements following RAP approval by the PATC.

V. **WIOA/TANF Funding through OJT, ITA, and Supportive Services:**

- A. WIOA/TANF-eligible participants seeking funding for eligible RAP activities must fulfill all WIOA Adult, Dislocated Worker, ISY, OSY, or TANF Youth eligibility requirements **before** receiving WIOA/TANF funding under contracts to include:
 1. ITA - Related Training and Instruction (RTI)
 2. OJT - On-the-Job Learning
 3. Individualized Career Services – See 20 CFR § 678.430.
 4. Supportive Services – See the SCPa Works Supportive Services Policy #P-7A-1.22.
- B. RAP translates to eligible WIOA and TANF funding.
 1. **Paid Job Experience:** RAPs deliver an employer-driven, learn-while-you-earn, structured training model specific to occupation, industry, job site, and the needs of the employee, building the program while providing a sustainable, paid work experience to the apprentice.
 2. **On-the-Job Learning:** Employers provide apprentices with a required minimum of 2,000 hours of paid, mentored, work-based learning experiences, or On-the-Job Training (OJT) experience, with a start-to-finish duration of one to six years.
 - a. WIOA OJT funding is limited to a lifetime maximum of \$7500.00 per RAP participant, and the duration of the OJT period cannot extend longer than six months.
 - b. OJT funding is available in alignment with the guidelines provided in the SCPa Works OJT Policy #P-15-2.22.
 - c. WIOA-funded time allotments are based on SCPa Works policies and do not reflect or account for the full 2,000 hours of required on-the-job learning per year for registered apprentices.
 - d. OJT funding can be combined with ITA funding; however, the total funding amount for A/DW participants is a lifetime maximum of \$7500.00.
 3. **Classroom Learning:** RAP requires 144 hours per year of supplemental, in-person classroom, or virtual Related Technical Instruction (RTI) in subjects specifically related to the trade the apprentice is actively learning through the mentored on-the-job learning experience.
 - a. RTI can be subsidized using WIOA ITA funds, limited to a lifetime maximum of \$7500.00 per RAP participant, and the duration of the ITA period cannot extend longer than 12 months.
 - b. ITA contracts must adhere to the SCPa Works ITA Policy #P-17-2.22 guidelines.
 - c. ITA-funded RTI may be provided by:
 - 1) A community college;
 - 2) A technical school or college;
 - 3) An apprenticeship training school; or
 - 4) Or by the employer or business where applicable.
 - d. RTI providers are directly connected to RAP and automatically qualify as eligible training providers for RAP completion.
 - e. ITA funding can be combined with OJT funding; however, the total amount for A/DW participants is a lifetime maximum of \$7500.00.
- C. Supportive Services:
 1. WIOA/TANF-eligible RAP participants are eligible for Supportive Services and may receive a lifetime allotment of \$2000.00 in allowable Supportive Services costs.
 2. RAP participants funded through WIOA **cannot** receive Supportive Services following exit.
 3. RAP participants funded through TANF **can** receive Supportive Services for **up to 12 months following the exit of the TANF program.**
 - a. This 12-month post-exit benefit is provided to eligible TANF Youth.

4. Reference the SCPa Works Supportive Services Policy #P-7A-1.22 for further guidance on allowable Supportive Services for WIOA/TANF-eligible participants.

VI. Incumbent Worker Training (IWT): Allowable costs for an individual or cohort of Registered Apprentices, all of whom are currently working under a signed Apprenticeship Agreement:

- A. Up to **\$7500.00** in IWT funding is an allowable expense for individuals within a cohort of registered apprentices currently enrolled and engaged in an existing RAP.
- B. IWT requests for a cohort of registered apprentices must be submitted to the SCPa Works Programs Department by vendor leadership personnel for approval, administration, and payment.
- C. SCPa Works IWT applications are submitted via email to SCPa Works Programs Department and must be detailed in a case note.
- D. Registered apprentices who are candidates for IWT funding through SCPa Works do not need to be WIOA-eligible to receive funding, nor do apprentices need to be prescreened for TANF eligibility.
- E. IWT procedures are determined, established, and implemented by SCPa Works on a case-by-case basis.
- F. For further guidance on IWT, reference the SCPa Works IWT Policy #P-8-5.22.
- G. Employers interested in IWT funding through SCPa Works should visit the SCPa Works website at <https://scpaworks.org/> and click the IWT Employer Application Link.

VII. Registered Pre-Apprenticeship: WIOA Adult, Dislocated Worker, In-School Youth, and Out-of-School Youth, & TANF Youth:

- A. Registered Pre-Apprenticeship Programs (Pre-RAP) are designed for individuals who may need more fundamental skills to succeed in a RAP, and for youth who are exploring career options and entry into a RAP.
 1. Eligible Pre-RAP participants must complete the WIOA/TANF eligibility and enrollment process through an SCPa Works vendor.
 2. Eligible WIOA OSY and TANF Youth Pre-RAP participants receive a lifetime maximum of \$3000.00 to fund Pre-RAP activities in addition to WIOA Adult services if eligible.
 - a. Funding requests for WIOA OSY and TANF Youth program costs, in addition to the \$3000.00 allotment, should be submitted to SCPa Works Programs Director.
- B. Pre-RAP serves as work experience, listed as one of the fourteen required WIOA Youth program elements, also included in the TANF Youth Development Program Manual.
- C. Pre-RAP is an allowable WIOA/TANF Youth program expenditure for In-School Youth under WIOA Youth or TANF Youth Paid Work Experience, Paid Internship, or Occupational Skills Training.
- D. Pre-RAP programming must be directly connected to or partnered with an active RAP.
- E. Pre-RAPs must be submitted to the SCPa Works Programs Department by vendor leadership personnel for approval, administration, payment, and confirmation that Pre-RAP is partnered with a RAP.
- F. Pre-RAP for WIOA In-School Youth (ISY) is eligible for Paid Work Experience funding through utilizing WIOA funding streams.
- G. Pre-RAP offered to Out-of-School Youth (OSY) are eligible for OJT, ITA, and IWT through the WIOA funding stream.
 1. OSY IWT must be processed under IWT approval through the completion, submission, and authorization of the SCPa Works IWT application and the Pre-RAP approval process.
- H. Pre-RAP for eligible TANF Youth participants is funded through TANF in the form of Occupational Skills Training and Paid Work Experience and must follow the SCPa Works TANF Application and TANF Occupational Skills Training guidelines.
 1. TANF-funded activities must be pre-approved by the SCPa Works Programs Team.
- I. Pre-RAP candidates eligible for WIOA/TANF services may receive a lifetime allotment of **\$2000.00** in allowable Supportive Services.
 1. Reference the SCPa Works Supportive Service Policy #P-7A-1.22 for further guidance on Supportive Services for WIOA/TANF-eligible participants.

- J. Pre-RAP activities must directly relate to objectives and goals listed in the participant's ISS and detailed in multiple case notes.
- K. Pre-RAPs serve as a gateway to RAPs while providing contextual learning that can promote and enhance high school completion levels, a WIOA Measurable Skill Gain.
- L. Pre-RAPs can include, but are not limited to, the following training activities:
 - 1. Occupational skills training;
 - 2. Cooperative education training;
 - 3. Skill upgrading and retraining;
 - 4. Paid or unpaid work experience;
 - 5. Internships;
 - 6. Pre-vocational and technical education;
 - 7. Basic math and reading skill instruction;
 - 8. Entrepreneurial training; and
 - 9. Mentoring activities.
- M. Throughout the Pre-RAP, vendors will support the participants through the benefit of Supportive Services and guide apprenticeship candidates on an occupational track.

VIII. RAP Wages:

- A. A progressively increasing wage schedule is paid to the apprentice for the duration of the RAP, as indicated by the employer.
 - 1. The progressively increasing apprentice wage rates are expressed in percentages of the journey worker's hourly rate.
 - 2. Wages rates will represent the minimum for each incremental period of the RAP.
- B. Vendors do not determine apprentice wages; however, **vendors must case note all aspects** of starting wages, wage rates, how the wages were determined, and the increasing schedule of wages for the duration of the RAP.

IX. Pre-RAP Wages:

- A. Wages for ISY/OSY Pre-RAP programming are determined by the employers offering the work experience.
- B. Employers must abide by the SCPa Works OJT and PWE contractual standards identified in SCPa Works OJT Policy #P-15-2.22 and Work Experience Policy #P-16-5.22.

X. Funding Allocations:

- A. WIOA Adults, Dislocated Workers, and Out-of-School Youth (OSY) Registered Apprentices:
 - 1. **\$7,500.00 Lifetime WIOA Maximums**
 - a. OJT or ITA, or a combination of both not exceeding \$7500.00 per apprentice within the lifetime maximum
- B. Incumbent Worker Training; Existing Registered Apprentices:
 - 1. **\$7,500.00 Lifetime WIOA Maximum**
 - a. OJT or ITA, or a combination of both not exceeding \$7500.00 per apprentice within the lifetime maximum
- C. WIOA Adults & Dislocated Workers, Pre-Apprenticeship as PWE
 - 1. **\$3,000.00 Lifetime Maximum with pre-approval from SCPa Works Programs Team for all Pre-Apprenticeships**
 - a. Allowable Adult/Dislocated Worker PWE funding for Pre-Apprenticeship is honored over 12 weeks with an allotment of \$3000.00.
 - b. If Adult/Dislocated Worker participants are enrolled in and hired by a Registered Apprenticeship Program following the completion of the **related** Pre-Apprenticeship

(PWE) program, an additional **\$7500.00** in ITA and/or OJT funding will be made available to the participant in support of the RAP.

- i. This amount reflects funding for OJT or ITA, or a combination of both not exceeding \$7500.00 per apprentice within the lifetime maximum
 - ii. Supportive services end upon program exit.
- D. WIOA In-School Youth (ISY) and Out-of-School Youth (OSY) Pre-Apprenticeship
 1. **\$3,000.00 Lifetime WIOA Youth Maximum with pre-approval from SCPa Works Programs Team for all Pre-Apprenticeships**
 - a. PWE (ISY & OSY) = \$3000.00 per pre-apprentice, lifetime maximum; **OR**
 - b. ITA (OSY only) = \$3000.00 per pre-apprentice, lifetime maximum; **OR**
 - c. OJT (OSY only) = \$3000.00 per pre-apprentice, lifetime maximum; **OR**
 - d. A combination of PWE/OJT and training totaling \$3000.00 per pre-apprentice.
 2. WIOA Youth contracts can be considered for additional funding through requests submitted to the SCPa Works Programs Director.
 3. OSY can be considered for WIOA funding for Pre-Apprenticeship and RAP under the 5th Priority designation with SCPa Works Programs approval.
- E. TANF Youth Pre-Apprenticeship
 1. **\$3,000.00 Lifetime TANF Youth Maximum with pre-approval from SCPa Works Programs Team for all Pre-Apprenticeships**
 - a. PWE = \$3000.00 per pre-apprentice, lifetime maximum; **OR**
 - b. Occupational Skills Training = \$3000.00 per pre-apprentice, lifetime maximum; **OR**
 - c. A combination of PWE and training totaling \$3000.00 per pre-apprentice.
 2. TANF Youth contracts can be considered for additional funding through requests submitted to the SCPa Works Programs Director.

XI. Registered Apprenticeship Funding Procedures:

- A. SCPa Works will only acknowledge the attainment of a RAP credential if the credential is received following the completion of the RAP. This can take up to six years. SCPa Works will honor work-related or skill-attainment-related credentials when an individual is enrolled.
- B. Contracted vendors develop, implement, administer, and monitor funding procedures for registered apprenticeship programs in the SCPa Works service area.
- C. The SCPa Works Programs Team need not approve internal vendor funding procedures unless by special request.
- D. It is recommended that all processes and procedures related to funding eligible RAP participants in on-the-job learning, classroom learning, work experience, occupational training, and supportive services match processes that are already in place for Supportive Services, OJT, ITA, PWE, IWT, and Occupational Skills Training.
- E. Vendors must develop and implement a RAP participant **walk-in** eligibility and enrollment process.
- F. Vendors must develop and implement a RAP participant **reverse referral** eligibility and enrollment process.
- G. Dual-enrolled participants must utilize Youth funding before using Adult/Dislocated Worker funding.
 1. Allowable services must be entered into CWDS aligned with the current funding source.





XII. SCPa Works RAP Participant Funding Source Form:


- A. The SCPa Work RAP Participant Funding Source Form must be completed and uploaded into CWDS as source validation for each RAP and pre-RAP service code entered.
 1. **Detailed case notes are required** to support the data recorded on the RAP Participant Funding Source Form.

XIII. CWDS RAP and Pre-RAP Service Code Designation:

- A. WIOA Adult, Dislocated Worker, and Adult IWT RAP Participants– **WTS15**
 - 1. OJT, ITA, IWT
- B. WIOA OSY RAP Participants – **WYS15**
 - 1. OJT, ITA, IWT
- C. WIOA ISY and TANF Youth Pre-RAP Participants (SCPa Works Programs approval required) – **WIS19**
 - 1. Occupational Skills Training (Individualized Career Services)
- D. WIOA Adult, Dislocated Worker, OSY & ISY, and TANF Youth Pre-RAP Participants (SCPa Works Programs approval required) – **WIS16**
 - 1. Paid Work Experience

XIV. Summary of Changes: This policy is reviewed every 180 days by the SCPa Works Policy Department for necessary changes, edits, updates, and revisions.

Date of Change:	Changed by:	Summary of Change(s):	Effective Date
09/14/2022	Saranne Miller 	<ol style="list-style-type: none"> 1. Sec. IV(A)(1) added relevant content via ATO. 2. Sec. V(C)(2) added content related to existing policies. 3. Sec. X(C)(1)(a) and (b) corrected Youth CAP to \$3000.00. 4. Sec. XI(K) added relevant content via ATO. 5. Sec. XI(L)(1)(a), (b), and (c) added content via Programs. 6. Sec. XII(J) added content via ATO. 7. Sec. XII(K)(1)(a),(b), and (c) added content via Programs. 	09/14/2022
03/24/2023	Saranne Miller 	<ol style="list-style-type: none"> 1. Adjusted language to reflect variances between WIOA and TANF funding. 2. Added pre-approval requirements. 3. Removed procedural content. 4. Added vendor procedural autonomy. 5. Added CWDS codes and form guidance. 	03/24/2023
06/02/2023	Saranne Miller 	<ol style="list-style-type: none"> 1. Sec. V(C) Adjusted follow-up Supportive Services guidelines for WIOA to match Supportive Services Policy. 2. Sec. VI Added IWT policy guidelines. 3. Sec. VII (A) Added Pre-RAP funding amount. 4. Sec. X(F) Add SCPa Works process and procedure implementation option. 	06/02/2023
10/23/2023	Saranne Miller 	<ol style="list-style-type: none"> 1. Sec. I(B)(6) pg 2 – added section 2. Sec. III(Q) pg 3 – added section 3. Sec. V(B) pg 4 – Deleted all mention of credentialing and mentoring, as it does not reflect WIOA/TANF gains. 4. Sec. VII pg 5 – added A/DW 5. Sec. X(C) pg 6-7 – added section 6. Sec. X(D)(3) pg 7 – added OSY 5th Priority consideration 7. Sec. XI(G) pg 7 – added section 8. Sec. XI(A) pg 7 – added credential disclaimer 9. Sec. XIII(D) pg 8 – added section 	11/09/2023

01.22.2024	Saranne Miller 	<ol style="list-style-type: none"> 1. Section I(B)(6)(a) - revised to clarify A/DW lifetime max of \$7500 and a PWE allotment of \$3000. 2. Section III – added definition of DOL per Todd Truntz. 3. Section III – added definition of DW per Todd Truntz. 4. Section III – added definition of WIOA Adult/DW per Todd Truntz. 5. Added Section V(B)(2)(d) to read: “OJT funding can be combined with ITA funding; however the total funding amount for A/DW participants is a lifetime maximum of \$7500.00.” 6. Added Section V(B)(3)(e) to read: “ITA funding can be combined with OJT funding; however the total funding amount for A/DW participants is a lifetime maximum of \$7500.00.” 7. Section VII(A)(2) – removed Stephanie Predko’s name per Todd Truntz. 8. Section X - revised to reiterate that all A/DWs receiving WIOA benefits must adhere to the lifetime maximum of \$7500.00. 	02.08.2024
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