

Expanding access to high-quality apprenticeship through the Carl D. Perkins Career and Technical Education Act

In the United States, apprenticeship has developed as an alternative to formal education rather than another pathway that young people can access in high school or college. In countries with strong apprenticeship systems, vocational education and apprenticeship are one in the same – not separate. The relative isolation of our apprenticeship system from formal education pathways and credentials is a barrier to its growth.

The reauthorization of the Carl D. Perkins Act is an opportunity to better integrate apprenticeship and Career and Technical Education, at both the secondary and postsecondary levels. This brief provides a set of concrete recommendations for reforms to the Perkins Act in the following four areas:

- 1) **Definitions:** Including definitions and more explicit references to apprenticeship into the law so that it is more visible and clearly aligned with other federal education and training programs;
- 2) **National Activities:** Leveraging the Secretary’s authority over national activities can promote and test new incentives for greater and more widespread alignment between Career and Technical Education and apprenticeship.
- 3) **Financing Dual Enrollment Apprenticeship Pathways:** Identifying opportunities to leverage CTE dual enrollment strategies to enable the development of apprenticeship programs that start in high school and extend into postsecondary.
- 4) **Integration with Postsecondary Degree Pathways:** Structuring accountability and funding criteria to incentivize the development of more Registered Apprenticeship programs that also culminate in an associate’s degree.

Below, please find more detailed explanations and recommendations for each bucket. We are using the current version of the law as the baseline for our recommendations, but will also present opportunities to build on H.R. 5587 where relevant.

Definitions

The House bill introduces many new terms into the Carl D. Perkins Act that would be useful to include in any newly authorized version of the law including career pathways, sector strategies, work-based learning, early college high school, intermediary, and work-based learning. However, what the House Bill shares with the 2006 Act are minimal and vague references to apprenticeship.

The reauthorization of the Carl D. Perkins Act is an opportunity to better integrate apprenticeship and Career and Technical Education, and that starts with definitions. Specifically, the Act should include a clear definition of “apprenticeship” that aligns directly with the definition included in the Workforce Innovation and Opportunity Act (WIOA). Elevating a clear definition of apprenticeship in Perkins will not only support integration with broader education and workforce policy at the federal and state levels, but also elevate the value of the apprenticeship pathway credential within the broader Career and Technical Education system. Using the WIOA definition negates the necessity of defining other terminology associated with apprenticeship, including “apprenticeship sponsor” and “related instruction.”

National Activities

Leveraging the Secretary’s authority over national activities can promote and test new incentives for greater and more widespread alignment between Career and Technical Education and apprenticeship. For example:

- **Advancing a clear definition of youth apprenticeship:** Career and Technical Education programs across the country are engaged in a range of activities related to youth apprenticeship. That includes serving as ad-hoc pre-apprenticeship programs that feed into adult Registered Apprenticeship programs as well as – in some limited cases – Registered Apprenticeships that students can start while still enrolled in high school.

Youth apprenticeship is an emerging field, and the Department of Education, in partnership with the Department of Labor, would do a service to that field by working together to help clarify the breadth of activities that connect CTE and apprenticeship programs. That should include a clear federal definition of a youth apprenticeship program and a youth apprentice.

- **High-Growth Youth Apprenticeship Demonstration Grants:** The Secretary has the authority to use grants, contracts, and cooperative agreements to conduct specific innovation-driven activities. The youth apprenticeship that occurs within the CTE system tends to be locally driven, while traditionally states have played a minimal role in supporting the development of a youth apprenticeship system through their CTE infrastructure. Through a series of 10-15 youth demonstration grants to states, this flexible money could be used to build capacity in state CTE systems to work with industry in high-growth sectors, including IT and cybersecurity, advanced manufacturing

and healthcare, to develop high-quality, statewide youth apprenticeship programs for CTE students. Such programs would be easily adaptable by local education agencies and serve to promote a statewide marketplace of high quality youth apprenticeship programs that align with the skills needs of industry sectors driving growth.

Financing Dual Enrollment Apprenticeship Pathways

While the effectiveness of dual enrollment programs for Career and Technical Education students is well established, financing remains one of the biggest challenges for establishing career-focused pathways in high school that extend into postsecondary education. Post-secondary course fees remain an issue, despite the benefits to the student in terms of post-secondary outcomes. To date, local education agencies are not well equipped to cover those costs, nor are states in that position either.

Apprenticeship offers the possibility of a new source of funding to support the expansion of dual enrollment programs if they can effectively attract employer investment into these pathways. At the same time, it is in the best interests of the student that the related classroom instruction within apprenticeship be associated with the accumulation of stackable academic credit. That's best practice in any dual enrollment program.

An effective CTE-youth apprenticeship ecosystem can support both objectives, by rewarding states and local areas that effectively attract employer investment in these programs while also assuring the quality and stackability of the post-secondary related classroom instruction for the student. There are a couple of ways the federal government could address the financing gap by rewarding states that attract employer investment, or that demonstrate progress on setting up and collecting information on youth apprenticeship pathways:

- **Youth Apprenticeship Formula Match:** To encourage states to design an apprenticeship-focused system of dual enrollment across their CTE programs, the Secretary could authorize a dollar-to-dollar match in state financing formulas that incentivizes states to promote industry investment into postsecondary classroom training for youth apprenticeship programs. States would document the amount of credit hours or tuition fees employers pay for related instruction for their apprenticeship programs, and for each of those dollars, states would receive a matching dollar through the federal formula. States could use this money to a) subsidize the costs of related instruction for employers running apprenticeship programs at Perkins eligible institutions, b) support the development of state infrastructure to support youth apprenticeship programs, or c) reward local education agencies for starting youth apprenticeship programs with local employers.
- **Youth Apprenticeship Outcomes Bonus:** States should be encouraged to leverage CTE systems to develop high-quality apprenticeship programs that culminate in academic credit, as well as improve data collection on the performance of youth apprentices in dual enrollment programs versus more traditional career focused pathways. To accomplish both goals, the Secretary could authorize a funding bonus to states that

enroll CTE students into dual enrollment apprenticeship pathways and/or report positive outcomes for students that exit those pathways with transferable academic credit as well as an apprenticeship credential. Bonus funding should be used by the states to support statewide apprenticeship activities as well as to reward local education agencies that successfully develop high-quality dual enrollment apprenticeship pathways.

Integration with Postsecondary Degree Pathways

Community and technical colleges already deliver a significant amount of the “related classroom instruction” that is required of Registered Apprenticeship programs. But, in most cases, that classroom instruction is not-for-credit and does not culminate in an associate’s degree. Colleges need to be incentivized to work with employers to create more apprenticeship programs and to ensure those programs also lead to an associate’s degree.

Changes to state planning processes, leadership activities, and accountability metrics could incentivize colleges to create more opportunities for apprentices to earn college credits – and degrees – through Registered Apprenticeship programs. Specifically:

- **State Leadership:** States can be encouraged to use their state set-asides to provide grants and/or technical assistance to colleges to stand up more apprenticeship programs and tie them to degree pathways. The House Bill increases the percentage of funds for the state set-aside – a move we support – and allows states to use those funds to help set up programs of study that start in high school and extend into college. We recommend expanding that language to include helping colleges establish integrated programs that connect Registered Apprenticeship and degree pathways. This can take the form of incentive grants to colleges or direct technical assistance to both colleges and employers.
- **Performance Metrics:** Under the current law, states and local areas are not held accountable for the labor market outcomes of postsecondary CTE students. This is a missed opportunity and creates few incentives for colleges to ensure their CTE programs are well-aligned with the needs of the labor market. The recent House bill, H.R. 5587, aligns with the performance metrics from Title I of the Workforce Innovation and Opportunity Act for postsecondary CTE students, including measures for completion, credential attainment, employment, earnings, technical skill gains, and transition into further postsecondary education. We support that change in the law.

The WIOA performance metrics can be further leveraged to reward community colleges that develop integrated Registered Apprenticeship/degree programs by allowing them to count these students as employed throughout their program, and to count their wages – and wage gains over the course of their apprenticeship – in their performance reports. Student-apprentices who complete their apprenticeships and programs of study can also be counted toward completion, credential attainment for two credentials (degree and apprenticeship certificate) measurable skills gains, and post-program

employment and earnings metrics. That is, community college students who are enrolled in a CTE program of study and a Registered Apprenticeship program can be counted toward the numerator of **multiple** performance metrics **simultaneously** – because they are earning while they learn, making it easier for the state to reach its negotiated performance targets.

States could further reward these integrated programs by providing bonus funding to colleges that meet negotiated targets for numbers of student-apprentices. The Secretary of Education could negotiate similar agreements with states (funding and language would be added to the “National Activities” section of the law).

- **State Plans:** Every state has to submit a six-year plan to the Secretary of Education, convening a wide array of community stakeholders, including employers and colleges, to develop the plan. Currently, the law does not call for any formal participation of the state’s apprenticeship council or representatives in the state planning process. The House bill creates the option of participating in a “combined” planning process with the state’s public workforce system, mirroring language in WIOA. We support that language and recommend adding a specific reference to including representatives from the state’s apprenticeship system in the planning process.