

Section 4: Manage

Ongoing Management of a Registered Apprenticeship Program

Program Records

Purpose: Describes the records that every apprenticeship sponsor must maintain in order to maintain compliance with DOL guidelines and federal regulations.



Every apprenticeship **sponsor** needs to maintain records that demonstrate its program’s compliance with their Apprenticeship Program Standards and federal DOL regulations. If an employer is the sponsor for their apprenticeship program, they are responsible to maintain these records. If the program is sponsored by an intermediary, the employer will still need to produce certain records for the intermediary, but the intermediary organization is responsible for maintaining them.

Required Program Records

Apprenticeship Program Standards & Appendices

Current, signed copies of the Apprenticeship Program Standards and all Appendices

Program Revisions

All versions (old and current) of the Program Standards and Appendices

Selection Procedures, HR Policies, and HR Records

Internal HR policies that demonstrate compliance with the selection procedures listed in the Appendix A

Affirmative Action Plan

Sponsors with five or more apprentices must create and maintain their affirmative action plan (AAP) within two years of registration

The AAP ensures that discrimination isn’t taking place in any part of the program. It should be developed in accordance with federal regulations.

Related Resources: (1) CFR 29 29, (2) CFR 29 30, 5.1 CFR Summary

These records must be kept to demonstrate compliance with the AAP for new hires for the apprenticeship program and should include things like applications for apprenticeships, interview and assessment results (if applicable), requests for reasonable accommodation, etc.

Related Resources: (1) CFR 29 29, (2) CFR 29 30, 5.1 CFR Summary

Apprentice Records

Purpose: Describes the records that every apprenticeship sponsor must maintain in order to maintain compliance with DOL guidelines and federal regulations.



Every apprenticeship **sponsor** needs to maintain records that demonstrate its program’s compliance with their Apprenticeship Program Standards and federal DOL regulations. If an employer is the sponsor for their apprenticeship program, they are responsible to maintain these records. If the program is sponsored by an intermediary, the employer will still need to produce certain records for the intermediary, but the intermediary organization is responsible for maintaining them.

Required Apprentice Records

Apprentice Work Process (WP) Progress

Apprentice hours worked in each WP category (if time based/hybrid) or competencies achieved (if competency-based/hybrid)

Apprentice RTI Progress

RTI completed successfully by apprentice based on approved Appendix A RTI list (e.g. unofficial transcripts)

Adherence to Wage Scale

Proof that each apprentice’s wages are at or above minimum wage scale based on apprentice progress in the program (e.g. pay stubs)

Credit for Previous Experience & RTI

Documentation of previous experience on the job or of previous training completed that will suffice to grant apprentice RTI credit

Apprentice Agreement (Form 671)

Standard form generated in RAPIDS and signed by the apprentice

Other Relevant Information...

Other records relevant to the apprenticeship, e.g. disciplinary actions, apprentice resignation, revisions to RTI or WP



The sponsor should maintain a file for each of their apprentices!

DOL Quality Assurance

Purpose: Describes the general process used to ensure that DOL registered apprenticeship programs maintain a high quality and serve both employers and apprentices.



All DOL registered apprenticeships are governed by two specific federal regulation parts, listed below. Detail about how to maintain compliance can be found in these regulations.

- (1) **CFR Title 29, Part 29: Labor Standards for the Registration of Apprenticeship Programs**
- (2) **CFR Title 29, Part 30: Equal Employment Opportunity in Apprenticeship**

Provisional Quality Assurance

All new registered apprenticeship programs are initially approved provisionally. One year after program registration, the DOL will conduct a Provisional Quality Assurance (PQA) Assessment visit with the sponsor to move the program to permanent status, or take steps to improve the program. During the PQA visit, the sponsor will be asked to provide the DOL with specific records that demonstrate that their program is in compliance with the apprenticeship standards and federal regulations.

Addressing Issues

If issues arise during a sponsor's PQA or quality reviews, their program will not automatically be deregistered. The DOL will work with the sponsor to fix issues with the program and help the sponsor to succeed. If the sponsor consistently does not address issues in their program or blatantly has serious issues with the apprenticeship, the DOL may recommend that their program be deregistered. The sponsor will be notified and can take 30 or 60 days to remedy issues before a final decision is made.

Program Performance Standards

Once a program is made permanent, its quality will be reviewed at least once every five years. Program quality is assessed upon:

- (i) **Quality Assurance Assessments** – review of program files to ensure that Program Standards and Appendix A are followed, at least one apprentice is registered (except between registrations), issues are resolved over time etc.
- (ii) **EEO Compliance Reviews** – review EEO procedures and AAP to ensure equal opportunity is afforded to apprentices and potential apprentices
- (iii) **Completion Rates** – the proportion of apprentices that complete their apprenticeship program and receive a DOL certificate.

Related Resources: (1) CFR 29 29, (2) CFR 29 30, 5.1 CFR Summary



If you're a workforce development professional and sometimes work with employers as they develop apprenticeship programs, it is recommended that you become familiar with CFR 29 29 and CFR 29 30!

Work Process Tracking Methods

Purpose: Provides some approaches that employers may use to track their apprentices' progress through their work process.

Frequency

Apprentice work process status should be kept in the apprentice's file and updated at least annually, however more frequently is recommended.

For **time-based** (TB) programs, it is recommended that apprentices submit progress at least monthly.

For **competency-based** (CB) programs, it is recommended that apprentices submit progress at least quarterly.

Hours Tracking

In TB programs, apprentice progress is measured by their hours worked in each of the Work Process (WP) categories listed in their program's Appendix A. As such, it is suggested that apprentices self-report hours worked in each category, and receive approval from their mentor.

Related Resources: 5.4 Sample TB WP Tracking Template

Competency Tracking

Since, in CB programs, progress is measured by apprentices' competency attainment, it's suggested that apprentices complete self-evaluations of competency against those listed in their work process, and then have those self-assessments approved by their mentor. It is suggested that sponsors use a scale of competency in such evaluations.

Related Resources: 5.5 Sample CB WP Tracking Template

Tracking Tools

Web-Based

Web-based apprenticeship tracking tools are gaining in popularity. They allow apprentices to enter progress, and mentors to approve progress, through an online interface. Web-based apprenticeship tracking tools can be customized to suit an employer's specific program and allow for simple TB and CB tracking.

Related Resources: (10) Online Apprenticeship Tracking Tool

Templates

Individual employers can utilize customized templates for tracking apprentice progress for TB or CB programs. These may be filled out by the apprentice digitally or on paper, depending on employer and apprentice preferences. See the attached sample templates for an idea of how an employer might track their apprentices' progress using a template that can be emailed or printed and submitted physically.

Related Resources: 5.4 Sample TB WP Tracking Template, 5.5 Sample CB WP Tracking Template