

DWD Technical Assistance 2022-17, Change 1: Apprenticeship Building America Grant Guidance

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Program: Work-Based Learning and Apprenticeship

PURPOSE

To provide supplementary apprenticeship guidance specific to the United States Department of Labor (DOL) Apprenticeship Building America (ABA) grant to assist Local Workforce Development Boards (referred to within this guidance as local boards or local areas) and other stakeholders with the implementation, administration, and management of the ABA grant. This guidance is intended to supplement DWD Policy 2022-09, Change 2 and DWD TA 2022-10, Change 2.

CHANGE 1 SUMMARY

This technical assistance has been updated with the following changes:

- The following bullets under the *Program Participant Eligibility* section have been updated:
 - Individuals served must be at least 16 years of age and are not already enrolled¹ in a Registered Apprenticeship Program (RAP) prior to the beginning of the ABA Grant period of performance, of July 1, 2022.
 - Participants must be enrolled in a RAP or Certified Pre-Apprenticeship prior to end of the grant's period of performance, which is June 30, 2026.
- The Wagner-Peyser co-enrollment requirement was removed.
- **Attachment B** - *Quality Framework for Pre-apprenticeship Programs* has been updated to align with TEN 23-23.
- **Attachment C** - *Examples of the ABA Grant's Quarterly Reports* has been removed.

RESCISSION

DWD Policy 2022-17 *Apprenticeship Building America Grant Guidance*

REFERENCES

See **Attachment A**.

¹ Enrolled means the individual is a participant and actively engaged in an apprenticeship program.

CONTENT

Grant Overview

The ABA grant program is intended to support a coordinated, national investment strategy that aims to strengthen and modernize the Registered Apprenticeship Program (RAP) system centered on equity and promote Registered Apprenticeship as a workforce development solution. DWD's ABA grant will expand opportunities in RAPs and Certified Pre-Apprenticeship programs that lead to RAP enrollment during the grant period of performance through state apprenticeship system building and modernization. Through this funding, DWD seeks to:

- Expand RAPs in target industries;
- Provide solutions for network coordination around data collection, data sharing, system change, and community of practice;
- Continue to integrate use of RAPs with other partner program resources, particularly with supportive services;
- Diversify RAP design and talent pipelines; and
- Bring local boards into the scaling of the existing Certified Pre-Apprenticeship framework in Indiana.

DWD has established ABA sub-awards with several local areas, with the sub-award period of performance being July 1, 2022, through May 15th, 2026. Milestones specific to each local area are included in the local areas' statements of work.

ABA Period of Performance

The table below outlines DWD's ABA award period of performance. As mentioned in the section above, local areas have slightly different period of performance dates than DWD's overall period of performance.

ABA Grant Period of Performance: July 01, 2022, through June 30, 2026 (Sixteen quarters)

End of 4th Quarter POP (25%)	End of 8th Quarter POP (50%)	End of 12th Quarter POP (75%)	End of 16th Quarter
July 1, 2022- June 2023	July 2023- June 2024	July 2024- June 2025	July 2025- June 30, 2026

Grant Performance Goals²

DWD Work-Based Learning and Apprenticeship's goal is to significantly expand both certified pre-apprenticeships as well as apprenticeship opportunities within Indiana's DOL approved RAPs. Local areas are to prioritize the following objectives when implementing the ABA grant:

² NOTE: local areas will be provided individualized metric information based on their grant's statement of work.

- **Engagement.** Activities that advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.
- **Service Delivery, Marketing, and Targeted Outreach.** Service to all eligible individuals. Local areas should ensure that their services align with their goal of effectively serving a diverse population of eligible individuals. In implementing the ABA grant, local areas are to remain cognizant of equity and civil rights to diligently serve underrepresented populations and underserved communities.
- **Expansion.** Expand apprenticeship opportunities in new industries.

Statewide Participant Outcomes

Participant Outcomes	Performance Goal
Total Participants Served	1619
Total Participants who Enroll in a RAP	1119
Total Number of Participants who Complete a RAP	45%
Total Number of Participants who Enroll in a Pre-Apprenticeship Served by ABA Grant Funding	500

Statewide Program Outputs

Program Outputs	Performance Goal
Total RAPs created as a result of ABA grant funding	25
Total RAPs expanded as a result of ABA grant funding	50

Target Industries and Key Occupations

RAPs and pre-apprenticeship programs related to the ABA grant must be centered on the following target industries that have been identified as part of Indiana’s strategic priorities:

Industry	Example of Key Occupations and Subindustries
Advanced Manufacturing	Industrial Maintenance, Machinist, Robotics, Engineering Technician
Health & Life Science	Registered Nurses, Nursing Assistants, Medical Assistants
IT & Business Service	Software Developer, Computer Systems Analyst, Systems Security, Business Management
Agriculture	Precision & Sustainable Agriculture
Transportation & Logistics	Warehousing, Truck Driver, Supply Chain Manager
Building & Construction	Electrician, Plumbers/Pipefitters, Carpenters,
Growth or Emerging Industry	Teaching & Education, Biotechnology, Electric Vehicle

Program Target Participant Populations³

Target populations for both RAPs and pre-apprenticeship programs are as follows:

- **Underrepresented populations:** This may include women, people of color, and persons with disabilities, as established in 29 CFR Part 30, where that population’s

³ https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/ABA_FOA-ETA-22-06.pdf

participation in RAPs is less than would be reasonably expected given the availability of such individuals for apprenticeship in the relevant industry, occupation, or recruitment area.⁴

- **Underserved communities:** Veterans, formerly incarcerated individuals, and youth. Within this population of youth, applicants may serve a wide range of individuals, such as high school and opportunity youth, youth who are employed or unemployed, justice-involved youth, underrepresented populations (i.e., people of color, women, persons with disabilities), and other youth with barriers to employment including foster youth, parenting youth, and housing insecure youth.
- **Unemployed workers:** An unemployed worker is an individual who is without a job, is seeking employment, and is available to work.
- **Underemployed workers:** This term refers to individuals who are not currently connected to a full-time job commensurate with the individual's level of education, skills, or wage and/or salary earned previously, or who have obtained only episodic, short-term, or part-time employment. The RAPs must include components that will assist those who do not have particular educational prerequisites and/or experience.

Program Framework Overview

RAPs

A RAP is an industry-driven, high-quality career pathway where employers can develop and prepare their future workforce, and individuals can obtain paid work experience, receive progressive wage increases, classroom instruction, and a portable, nationally recognized credential.⁵ All RAPs contain the following five key elements:⁶

- Direct Industry Involvement;
- Structured On-the-job Learning (OJL);
- Related Technical Instruction (RTI);
- Progressive Wage Increase; and
- National Industry-Recognized Credential.

Pre-Apprenticeship Programs⁷

A quality pre-apprenticeship program can play a valuable role in providing work-based learning opportunities and helping individuals gain industry exposure and proficiency in basic work readiness, reading comprehension, math, and other skills to enter a RAP.⁸ For the purposes of the ABA grant, pre-apprenticeship programs must include the following five components to be considered a quality pre-apprenticeship program:⁹

⁴ NOTE: This policy may be updated to align with Federal guidance.

⁵ See DWD's *United States Department of Labor (DOL) Apprenticeship Grants* policy for additional RAP information.

⁶ Per FOA-ETA-22-06 *NOTICE OF AVAILABILITY OF FUNDS AND FUNDING OPPORTUNITY ANNOUNCEMENT FOR: Apprenticeship Building America (ABA) Grant Program*.

⁷ See DWD'S *Department of Workforce Development Certified Pre-Apprenticeship Programs* technical assistance for additional guidance on the pre-apprenticeship certification process.

⁸ TEN 23-23.

⁹ See **Attachment B** for additional information on the pre-apprenticeship program framework.

- Related Technical Instruction (RTI)
- On-The-Job Learning (OJL)
- Career Counseling, Mentoring, and Other Supportive Services¹⁰
- Industry Recognized Credential
- Articulation Agreement

Pre-apprenticeship programs funded through this grant must directly lead to RAPs during the grant period of performance. Pre-apprenticeship programs funded under this grant are to ensure that the skills and competencies being developed are aligned with community industry needs including but not limited to the Target Industries in the table above.

Program Validation/Certification

RAPs

Registered Apprenticeships are industry-vetted and approved and validated by DOL or a State Apprenticeship Agency and must abide by the DOL Standards of Apprenticeship and Program Performance Standards.¹¹

Pre-Apprenticeship Programs

To ensure that pre-apprenticeship programs are high quality and provide a clear path to a RAP, an ABA funded pre-apprenticeship program must be certified through Indiana's DWD Work-Based Learning and Apprenticeship.¹² The certification process for both existing and newly developed pre-apprenticeship programs will be completed through the use of the Next Level Jobs Portal. Certified Pre-Apprenticeship Program information and data will be housed within the Customer Relationship Manager (CRM).

Program Participant Eligibility

Eligibility for both RAPs and pre-apprenticeship programs is as follows:

- Individuals served must be at least 16 years of age and are not already enrolled in a RAP prior to the beginning of the ABA Grant period of performance, of July 1, 2022.
- Legally entitled to work in the United States;¹³ and
- Participants must be enrolled in a RAP or Certified Pre-Apprenticeship prior to end of the grant's period of performance, which is June 30, 2026.

NOTE: Veterans and eligible spouses must receive priority of service for all DOL funded job training programs.¹⁴ Veterans must meet each program's eligibility criteria to receive services under the respective employment and training program.

¹⁰ See DWD's *United States Department of Labor (DOL) Apprenticeship Grants* policy for additional guidance on apprenticeship grant supportive services.

¹¹ 29 CFR Part 29 provides additional guidance.

¹² See DWD'S *Department of Workforce Development Certified Pre-Apprenticeship Programs* technical assistance for additional guidance on the pre-apprenticeship certification process.

¹³ See DWD's *United States Department of Labor Apprenticeship Grants* policy for additional guidance on eligibility to work in the U.S.

¹⁴ See DWD's *Priority of Service for Veterans and Eligible Spouses in Indiana Department of Workforce Development's Integrated WorkOne Offices* policy for additional guidance.

Use of Funds and Maximum Allowable Amounts

The following activities may be provided with grant funds for RAP and pre-apprenticeship participants.

Related Technical Instruction (RTI)

ABA Grant funds can be used to fund RTI for both RAP and Certified Pre-Apprenticeship programs.

- RTI providers identified within an approved RAP and/or DWD Work-Based Learning and Apprenticeship Certified Pre-Apprenticeship programs must be listed on DWD's INTraining and Eligible Training Provider Lists (ETPL) when using ABA funding.¹⁵
 - These approved programs will be identified as Apprenticeship or Certified Pre-Apprenticeship.
- ABA Grant funds may be used in RTI course work as defined within approved RAP or Certified Pre-Apprenticeship Program.
- All RTI training funded by the ABA grant must be recorded within Indiana Career Connect (ICC) following applicable DWD guidance.

On the Job Learning (OJL)

ABA Grant funds can be used with OJL for RAP and Certified Pre-Apprenticeship programs.

OJL is provided by an employer to a paid participant while engaged in productive work in a job as part of a RAP or Certified Pre-Apprenticeship Program. ABA funds may be used to provide reimbursement to the employer of up to 50% of the wage rate of a participant for the extraordinary costs of providing the training and additional supervision related to the training. OJL programs must:

- Provide knowledge or skills essential to the full and adequate performance of the job; and
- Be limited in duration as appropriate to the occupation being trained, and as defined within the RAP or Certified Pre-Apprenticeship program.

Note: RAP OJL providers (employers) are **not** required to be on the ETPL, unless they are providing RTI, but are required to be added as a provider in ICC.

Supportive Services¹⁶

ABA Grant funds can be used for supportive services in both a RAP and Certified Pre-Apprenticeship programs. Local areas may use up to 20% of total grant funds to provide supportive services to individuals who are participating in education and training activities funded through the grant, **only** when such services:

¹⁵ See DWD's *INTraining and Eligible Training Provider List (ETPL) Eligibility and Establishment Under WIOA Title I* policy for additional guidance.

¹⁶ See DWD's *United States Department of Labor (DOL) Apprenticeship Grants* policy and *Indiana Career Connect Data Entry for DOL Apprenticeship Grants* technical assistance for additional supportive service and data entry guidance for DOL apprenticeship grants.

- Cannot be obtained through other programs; and
- Necessary to enable individuals to participate in education and training activities under the grant.

Note: Where stipends for supportive services are provided, the stipend amount must be for costs of a specific supportive service (e.g., childcare), rather than simply based on an unidentified need.

Maximum Allowable Amounts

Category/Service	Maximum
Administrative Costs	Up to 5% of award
Program Maintenance and Support	Up to 20% of award
Supportive Service Costs	Up to 20% of award
RTI/OJL Costs for Certified Pre-Apprenticeship	Up to 10% of award
RTI with RAP	No percentage limit of award
OJL with RAP	No percentage limit of award

DWD Grant Performance Management

Apprenticeship grant performance is managed by DWD Work-Based Learning and Apprenticeship. To ensure data entry is timely and reported activities and outcomes are accurately supported with the appropriate source documentation, performance outcomes will be reviewed and compared to established milestones at least quarterly. OWLBA's grant performance management process may include, but is not limited to, review of the following:

- Case management and Client Relationship Manager (CRM) system reports;
- Electronic participant records; and
- Financial records.

Technical Reviews

In the event that a local area does not meet established performance milestones for a particular quarter, DWD Work-Based Learning and Apprenticeship will request a one-on-one meeting with the LWDB and staff delivering the ABA grant activities. Potential interventions include but are not limited to the following:

- Provide additional technical assistance;
- Provide strategy suggestions; and
- Provide insight to Federal Regulations and DWD policy.

The ABA grant is non-formula funded and will be subject to applicable requirements and practices specified in DWD's *Non-Formula Grant Performance Management* policy.

In addition to the grant management and performance protocols described herein, grant performance outcomes will be reviewed and assessed during routine DWD grantee monitoring and may result in monitoring findings, including questioned or potentially disallowed costs, and corrective action requirements.

Local Board Grant Expectations

Participating boards are to ensure their grant activities address program goals which must include, at a minimum, the following activities:

- Expand RAPs in target sectors.
- Provide solutions for network coordination around data collection, data sharing, system change, and community of practice.
- Continue to integrate use of RAP with local area partners and resources.
- Diversify RAP design and talent pipelines, with an emphasis on equity.
- Scale the existing Pre-Apprenticeship framework in Indiana.

Overall, grant activities must align with Indiana's WIOA State Plan goals, while grant strategies are to result in improved performance outcomes as identified in and mutually agreed upon in each local area's respective statement of work.

The local board will adhere to applicable state and federal laws and regulations as well as all applicable DWD policies and technical assistance issuances during the execution of the grant.

Data Collection and Eligibility Documentation¹⁷

The local board, as a grant recipient, will be required to collect and record participant data services and outcomes into DWD's electronic information systems accurately and timely. All participant services and activities must be recorded in ICC in alignment with DWD's *Maintaining Data Integrity in Workforce Programs* policy. Participants and employers served by the ABA grant must be fully documented in ICC and the CRM system. Certified Pre-Apprenticeship Program's information and data will be housed within the CRM.

States are required to submit individual participant records that include information on demographics, services received, and resulting outcomes. Program eligibility must be verified through the collection and maintenance of supporting documentation within DWD information systems.

All workforce staff must access, maintain, and store participant information in a manner that ensures confidentiality in accordance with all federal and state guidance related to confidentiality and the handling of protected information.¹⁸

Co-Enrollment

To meet all data elements of apprenticeship grant reporting, participants are required to be fully enrolled in the Apprenticeship (APR) program. This consists of a fully completed Apprenticeship application as well as placement into participation with entered first activity.

¹⁷ See DWD's *Indiana Career Connect Data Entry for DOL Apprenticeship Grants* technical assistance for additional data entry guidance and **Attachment C** of DWD's *United States Department of Labor (DOL) Apprenticeship Grants* policy for a list of acceptable eligibility documentation.

¹⁸ See DWD's *Safeguarding Protected Information and DWD User Accounts Management* policy for additional guidance.

Additionally, local areas are expected to follow DWD's *Co-enrollment and Common Exit* policy to improve participant outcomes through strategic co-enrollment as well as leverage other funding sources to provide braided and comprehensive service delivery.¹⁹ Programs potentially eligible for co-enrollment include but are not limited to Workforce Innovation and Opportunity Act programs, state funded programs, and programs funded through philanthropy.

Quarterly Progress Reports and Invoicing

Local areas will be required to report grant activities, expenditures, and performance outcomes on a quarterly basis with the first report due to the DWD Work-Based Learning and Apprenticeship Grants Manager electronically by the dates outlined in the LWDB's statement of work.

Local areas must prepare and electronically submit the following quarterly grant progress reports²⁰ to the DWD Work-Based Learning and Apprenticeship Grant Manager at WBL@dwd.in.gov.²¹

- ABA Grant - Quarterly Narrative Report
- ABA Grant - Quarterly Staffing, Time Charging and Point of Contact (POC)
- ABA Grant Invoice²²
- ABA Grant - Quarterly Productivity Report

ABA Grant Timeline and Quarterly Report Due Dates²³

Quarters	Quarter Begins	Quarter Ends	Quarterly Reports Due	Years	# Of Quarters
Jan, Feb, March	January 1st	March 31st	April 15th	2023, 2024, 2025, and 2026	4
April, May, June	April 1st	June 30th	July 15th	2023, 2024, 2025, and 2026	4
July, Aug, Sept	July 1st	September 30th	October 15th	2023, 2024, and 2025	4
Oct, Nov, Dec	October 1st	December 31st	January 15th	2023, 2024, and 2025	4
				Total Quarters	16

Local-Level Oversight & Monitoring

Local boards must include their apprenticeship grants in local oversight and monitoring processes to ensure grant funds are being spent appropriately, grant participants are

¹⁹ DWD's *Co-enrollment and Common Exit* policy for additional guidance.

²⁰ See **Attachment C** for examples of each of the ABA Grant's quarterly progress reports.

²¹ Original report templates and instructions will be provided to the local area by the DWD Work-Based Learning and Apprenticeship Grant Manager.

²² Significant changes in services or programs (such as overbilling or contract amendments) will require prior approval by DWD Work-Based Learning and Apprenticeship.

²³ **Note:** If the Quarterly Reports due date is on a weekend or Holiday, submit on the next regularly scheduled workday.

progressing according to RAP guidelines, and data entry and documentation requirements are being followed.

Performance

Local boards are expected to meet their established goals as defined in the statement of work section of their grant agreement. Failure to meet performance milestones for two consecutive quarters may result in, at DWD Work-Based Learning and Apprenticeship's discretion, ABA funds being returned to re-distribute appropriately.

ATTACHMENTS

Attachment A - References

Attachment B - Quality Framework for Pre-apprenticeship Programs

ADDITIONAL INFORMATION

Questions regarding the content of this publication should be directed to WBL@dwd.in.gov.

ATTACHMENT A REFERENCES

- 29 CFR Part 29
- FOA-ETA-22-06 *NOTICE OF AVAILABILITY OF FUNDS AND FUNDING OPPORTUNITY ANNOUNCEMENT FOR: Apprenticeship Building America (ABA) Grant Program*²⁴
- TEGL 13-16 and TEGL 13-16, Change 1 *Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act (WIOA)*
- TEN 23-23 *Quality Pre-Apprenticeship Programs*
- DWD Policy 2022-09, Change 2 *United States Department of Labor (DOL) Apprenticeship Grants*
- DWD TA 2022-10, Change 2 *Indiana Career Connect Data Entry for DOL Apprenticeship Grants*
- DWD Policy 2015-08 *Priority of Service for Veterans and Eligible Spouses in Indiana Department of Workforce Development's Integrated WorkOne Offices*
- DWD Policy 2020-16, Change 3 *INTraining and Eligible Training Provider List (ETPL) Eligibility and Establishment Under WIOA Title I*
- DWD Policy 2021-08, Change 1 *Co-enrollment and Common Exit*
- DWD Policy 2021-10, Change 3 *Safeguarding Protected Information and DWD User Accounts Management*
- DWD Policy 2023-05 *Maintaining Data Integrity in Workforce*
- DWD Technical Assistance 2025-05 *Department of Workforce Development Certified Pre-Apprenticeship Program*

²⁴ https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/ABA_FOA-ETA-22-06.pdf

ATTACHMENT B

QUALITY FRAMEWORK FOR PRE-APPRENTICESHIP PROGRAMS²⁵

1. **Partnership with RAP sponsors.** Quality pre-apprenticeship programs should be designed and delivered with input from at least one RAP sponsor. A pre-apprenticeship program's educational and pre-vocational services prepare individuals to meet the entry requisites of one or more RAPs and occupations. Examples of partnerships include:
 - a. A written plan developed by the pre-apprenticeship program with training goals to teach participants a defined set of skills required and agreed upon by one or more RAP sponsors for entry into their programs.
 - b. Identified engagement between one or more RAP sponsors and the pre-apprenticeship program, which can include program visits, access to RAP mentors, granting of direct entry, etc.
 - c. The granting of advanced standing/credit from one or more RAP sponsors for pre-apprenticeship program graduates.
 - d. Direct assistance to participants applying to those programs.

2. **Sustainability through partnerships.** To support their ongoing sustainability, quality pre-apprenticeship programs establish partnerships with entities to collaboratively promote the use of RAPs as a preferred means for employers to develop a skilled workforce and to create career opportunities and pathways for individuals. Partnerships may include RAP sponsors, DOL-funded intermediaries who develop programs or provide training to programs, community and faith-based organizations, advocacy organizations that represent underserved populations, labor organizations, joint labor-management organizations, educational institutions (including high schools and community colleges), and the public workforce system. (See section 4.e of TEN 23-23 for specific examples.)

3. **Meaningful training combined with hands-on experience replicating a workplace that does not displace paid employees.** Quality pre-apprenticeships provide hands-on training to individuals in a workplace, simulated lab experience, or work-based learning environment, which does not supplant a paid employee, but effectively simulates the industry and occupational conditions and standards of the partnering RAPs while observing proper supervision and safety protocols. Pre-apprenticeship programs ideally provide opportunities to obtain an industry-recognized credential, as well as potential stipends or wages when funding allows.

4. **Access to career and supportive services.** Quality pre-apprenticeship programs provide or otherwise ensure access to career and supportive services during the program, which may continue after a pre-apprentice enters a RAP. Services may include both financial and non-financial supports such as stipends, career counseling,

²⁵ TEN 23-23.

career exploration, mentoring, transportation assistance, childcare, dependent care, rehabilitative services, textbooks, tools, emergency grants, and other types of services necessary for an individual to succeed in pre-apprenticeship programs and RAPs.

Supportive services may refer to any service that assists participants to qualify for and maintain participation in a pre-apprenticeship program or Registered Apprenticeship Program. Broadly, supportive services are those intended to assist individual participants with an assessed need in order to ensure participants' success in completing the pre-apprenticeship program, gaining employment, acquiring necessary skills, or addressing any other identified barriers. Quality pre-apprenticeship programs may directly provide supportive services to pre-apprentices or facilitate the provision of supportive services through referrals. The intent of this term is to ensure supportive services are available and emphasize the importance of such services being integrated into pre-apprenticeship programs.

Funding for supportive services can often be leveraged from Federal, State, local, and private funding, as well as community organizations that provide social support and/or wrap-around services.

5. **Strategies that increase Registered Apprenticeship opportunities for underrepresented or underserved populations facing significant barriers to employment in the Registered Apprenticeship labor force.** Examples include:
 - a. Thoughtful, dynamic, and documented recruitment strategies focused on outreach to one or more populations underrepresented or underserved in local, state, and national RAPs.
 - b. Educational and pre-vocational services as well as design of instruction and training that reach underrepresented or underserved populations to assist them in overcoming barriers to entering and succeeding in RAPs. These include career and industry awareness workshops, job readiness courses, English for Speakers of Other Languages, Adult Basic Education, financial literacy seminars, and math tutoring.
 - c. Exposing participants to local, state, and national RAPs and providing direct assistance to participants applying to those programs.