

State of Delaware
Department of Labor
Division of Employment and Training
Office of Apprenticeship and Training

Registered Pre-Apprenticeship
Policies and Procedures



I. Goals

Pre-Apprenticeship Programs refer to a program or set of strategies designed to prepare individuals to enter and succeed in a Registered Apprentice Program. Pre-Apprenticeship Programs are designed to:

1. Create a qualified pipeline of individuals ready to become Registered Apprentices;
2. Expand Registered Apprentices to include underrepresented participants such as non-traditional gender or race/ethnicity, disadvantaged populations; or low-skilled workers; and
3. Recognize credit for related education or training.

II. Definitions

“Apprenticeship Agreement” refers to a written agreement between the State Apprenticeship Agency, Registered Apprentice, and either his/her Registered Sponsor or an Apprenticeship Committee acting as an agent for the Employer, which contains the terms and conditions of the employment and training of the Registered Apprentice.

“Apprenticeship Standards” refers to the document which sets forth the terms for the Registered Sponsor and State Apprenticeship Agency. At a minimum it contains the elements outlined in 29 CFR Part 29.5, Equal Opportunity Pledge found in 29 CFR 30.3, and section 6 of these regulations.

“Disadvantaged” refers to a broad category which embraces any individual who would be considered to have fewer opportunities than his/her peers. Some examples include individuals with disabilities, low-income individual/family, or socially disadvantaged individuals. Socially disadvantaged are those who have been subjected to racial or ethnic prejudice or cultural bias within American society because of their identities as members of groups and without regard to their individual qualities.

“Employer” refers to any person or organization employing a Registered Apprentice, whether or not such person or organization is a party to an Apprenticeship Agreement with the Registered Apprentice.

“Industry Standards” refers to the generally accepted practices of an industry, in terms of the knowledge, skills and aptitudes that are demonstrated by members of the industry. Generally accepted practices are represented by the performance of, or instruction in, specific occupational tasks relevant to that industry by employers, journey person(s), educators, and other subject matter experts. By using the term Industry Standards in this manner, the intent of the definition is to ensure that training and/or curricula used by the pre-apprenticeship program align with the needs of the Registered Apprenticeship partner(s), while still allowing flexibility in pre-apprenticeship program design.

“Journey person” refers to a worker who has mastered the skills and competencies required for the occupation. Use of the term may also refer to a mentor, technician, specialist or other skilled worker who has documented sufficient skills and knowledge of an occupation, either through formal apprenticeship or through practical on-the-job experience, and formal training.

“Low-Skilled Populations” refers to those individuals who possess less than 1 years’ work experience in relevant trade. Typically, these individuals’ educational attainment is not greater than a high school diploma or recognized equivalent.

“Office of Apprenticeship” refers to the office designated by the Employment and Training Administration to administer the National Apprenticeship System or its successor organization.

“OJT” refers to on-the-job training related to the trade of study.

“Pre-Apprenticeship Program” refers to a program or set of strategies designed to prepare individuals to enter and succeed in a Registered Apprentice Program and has a documented partnership with at least one, if not more, Registered Apprenticeship Program(s).

“Pre-Vocational Services” refers to services that support the development of general work skills and concepts rather than those work skills required for a particular job. This includes the development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct services to prepare individuals for unsubsidized employment or training career and industry awareness workshops, job-readiness courses, English for speakers of other language, math tutoring, etc.

“Registered Apprentice” refers to a worker, at least sixteen years of age, who is engaged in learning an apprenticeable occupation through actual work experience under the supervision of a Journey person. This person must enter into a written Apprenticeship Agreement with a Registered Sponsor. The training must be supplemented with properly coordinated studies of Related Instruction. All hours worked by a Registered Apprentice, while in the employ of the Registered Sponsor and in the trade of study, shall be considered apprenticeship hours to be counted toward wage progression increments and completion of his/her OJT hours as set forth in the Apprenticeship Agreement.

“Registered Apprenticeship Program” refers to an executed Apprenticeship Standards between a Registered Sponsor and State Apprenticeship Agency or USDOL. This includes an apprenticeship plan containing all terms and conditions for the qualifications, recruitment, selection, employment and training of Registered Apprentices, including such matters as the requirement for a written Apprenticeship Agreement.

“Registered Sponsor” means any person, association, committee, or organization operating a Registered Apprenticeship Program and in whose name the Apprenticeship Program is (or is to be) registered or approved regardless of whether or not such entity is an employer. To be eligible to be a Registered Sponsor in a Delaware Registered Apprenticeship Program, an employer/business, association, committee or organization must complete the State Apprenticeship Agency’s Sponsor Application, have the training program and an adequate number of Journey persons to meet the ratio requirements as stated for that particular apprenticeable occupation.

“Related Instruction” refers to the formal instruction designed to provide the Registered Apprentice with knowledge of the theoretical and technical subjects related to his/her occupation. Such instruction may be given in a classroom, through occupational or industrial courses, or by correspondence courses of equivalent value, electronic media, or other forms of self-study approved by the State Apprenticeship Agency or other Registration Agency. In no event shall the State of Delaware subsidize the instruction of any Registered Apprentice whose employment is not associated with the payment of income taxes to the State of Delaware, which finances such educational subsidies and is determined during registration.

“State” refers to the State of Delaware.

“State Apprenticeship Agency” The state agency recognized by USDOL which has the responsibility and accountability for apprenticeship within the state. Only a State Apprenticeship Agency may seek recognition by the Office of Apprenticeship as an agency which has been properly constituted under an acceptable law or Executive Order, and authorized by the Office of Apprenticeship to register and oversee Apprenticeship Programs and agreements for Federal purposes. In Delaware, the State Apprenticeship Agency is the Delaware Department of Labor.

“State Apprenticeship Council” is an entity established to provide advice and guidance to the State Apprenticeship Agency. A State Apprenticeship Council is ineligible for recognition as the State’s Registration Agency.

“State Apprenticeship Agency” means an agency of a state government that has responsibility and accountability for apprenticeship within the state. Only a State Apprenticeship Agency may seek recognition by the Office of Apprenticeship as an agency which has been properly constituted under an acceptable law or Executive Order, and authorized by the Office of Apprenticeship to register and oversee apprenticeship programs and agreements for Federal purposes.

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

“Under Represented” the term under-represented is intentionally broad. Generally, the term “under-represented” means a population that does not represent the majority, or a proportional share as indicated by appropriate data, of current participants in Registered Apprenticeship. For example, veterans may be an under-represented population in Registered Apprenticeship. The intent of this term is to encourage Pre-Apprenticeship programs to be inclusive of all populations that may benefit from Registered Apprenticeship, including those that do not, proportionally participate in Registered Apprenticeship regardless of the reason.

“Work Readiness” Refers to the skills, aptitudes, and attitudes employers expect job seekers to have in preparation for the demands of the workplace. Can be obtained through education or job training programs, employer-sponsored events, work-based learning, and other activities that increase transferable skills. Skills may be taught that focus on these work behaviors, not necessarily the occupational or technical skills. These include skills such as problem solving, working with others, communication, etc.

III. Required Components of a Program

The following are the required components for an approved Registered Pre-Apprenticeship Program:

1. Employer Engagement

Objective: Demonstrate that the Pre-Apprenticeship Program is engaging with Registered Apprenticeship Sponsors (employers).

All Pre-Apprenticeship programs must:

1. Align to at least one Registered Apprenticeship (RA) program. A letter of support from at least one RA Sponsor must accompany the Pre-Apprenticeship application; and
2. Include job placement support services for participants focused on RA employer(s).

In addition, other examples of Employer Engagement can include:

- Formalized agreements with RA sponsors to hire Pre-Apprentices upon successful completion;
- Collaborative promotion of RA as a preferred means for employers to develop a skilled workforce and create career opportunities for individuals; and
- Use of employers including established industry councils/program advisory committees to inform curriculum, placement, etc.

2. Established Curriculum

Objective: To prepare individuals with the skills and competencies needed to enter into and be successful in a Registered Apprenticeship (RA) program.

Training models and curriculum must be approved to become a Pre-Apprenticeship program and the following are to be demonstrated within the application:

1. Align to industry or occupational standards/needs (including academic and technical skills needs);
2. Provide training in work-readiness and/or “soft skills” as integrated parts of the training curriculum. These should be taught and reinforced continually as important and interrelated parts of the program;
3. Provide career exploration activities such as occupational interest assessment and/or specific career and industry awareness workshops;
4. Include meaningful hands-on training that will accurately simulate the industry and occupational conditions while observing proper supervision and safety protocols. Some examples include: simulated lab experience, job shadowing, and paid internship/work experience opportunities that do not displace existing paid positions;
5. Demonstrate linkages between the program and related support services for participants to alleviate employment barriers. This could include expungement programs, how to communicate criminal background to employers, support in obtaining a driver’s license, transportation assistance, assistance with stable housing or other public assistance, and addressing mental health and substance abuse needs;
6. Define knowledge and skill competencies/standards as part of the curriculum outline; and
7. Include a letter(s) of support and/or formalized agreement between the Pre-Apprenticeship program and the related instruction provider for at least one of the RA sponsors included in the application, which includes any details for articulation agreements and/or advanced standing agreement, e.g. completion of Pre-Apprenticeship program leads to advanced placement for related instruction of RA.

3. Inclusion of Underrepresented, Disadvantaged, or Low-Skilled Populations

Objective: Underrepresented participants such as non-traditional gender or race/ethnicity, disadvantaged populations; or low-skilled workers will be prepared to meet the entry

requirements and be successful in a RA program. Programs are required to include one of the following:

1. Provide and/or make referrals for individuals to related educational services and pre-vocational services to eliminate employment barriers. Services should be targeted to the population being served, e.g. specific services for English Learners, women, or workshops for parents and/or high school students to educate on RA as a postsecondary education option; or
2. Support recruitment and outreach focused on the enrollment of underrepresented, disadvantaged, or low-skilled populations.

IV. Other Requirements

1. Organization seeking approval for a Pre-Apprenticeship program must be one of the following:
 - a. Public entity; or
 - b. Private for Profit organization and must provide State of Delaware Business License(s) with application; or
 - c. Non-profit organization and must provide documentation of 501(c)(3) status with application.
2. Be considered in compliance by the Department of Labor, Division of Unemployment Insurance, and Division of Industrial Affairs;
3. Any Registered Sponsor who is either included as a Registered Sponsor in the Pre-Apprenticeship application or the applicant itself, must be considered compliant with the Office of Apprenticeship. This includes being up to date on all required documentation. This relates to their Registered Apprenticeship program.
4. After program approval and within 30 days, obtain the following insurance coverage at Organization's own expense:
 - a. Provider shall in all instances maintain the following insurance during the term of approved program:
 - i. Worker's Compensation and Employer's Liability Insurance in accordance with applicable law.
 - ii. Commercial General Liability-\$1,000,000.00 per occurrence/\$3,000,000 per aggregate.
 - b. The successful Provider must carry at least one (1) of the following depending on the scope of work:
 - i. Medical/Professional Liability-\$1,000,000.00 per occurrence/\$3,000,000 per aggregate.
 - ii. Miscellaneous Errors and Omissions-\$1,000,000.00 per occurrence/\$3,000,000 per aggregate.
 - iii. Product Liability-\$1,000,000 per occurrence/\$3,000,000 aggregate.
 - c. If the approved program provides transportation of staff or participants, the Organization shall, in addition to the above coverage's, secure at its own expense the following coverage:
 - i. Automotive Liability Insurance (Bodily Injury) covering all automotive units transporting departmental clients or staff used in the work with limits of not less than \$100,000 each person and \$300,000 each accident.
 - ii. Automotive Property Damage (to others) - \$25,000

Upon approval, the Organization shall provide a Certificate of Insurance (COI) as proof that the Provider has the required insurance. The COI shall be provided prior to any work being completed. The State of Delaware shall not be named as an additional insured.

V. Approval Process

1. Pre-Apprenticeship Program Application (Attachment A) must be submitted in the manner specified on the application to the Delaware Office of Apprenticeship. The application can be obtained from <https://det.delawareworks.com/apprenticeship-and-training.php> or emailing Apprenticeship@Delaware.gov.
2. Upon receipt the Delaware Office of Apprenticeship will review the application to determine if the program meets the required components listed in Section Three (III). See Attachment B for a checklist which can be used to review application materials.
3. Provide the Department of Labor, Division of Unemployment Insurance, and Division of Industrial Affairs with the Organization's name to check for current compliance.
4. For programs seeking renewal, the Office of Apprenticeship will review the application in its entirety again and prior performance. Items that will be reviewed are number of pre-apprentices served compared to the number completed, inactivity, non-compliance with any of the policies found within this document.
5. During the review process, the Delaware Office of Apprenticeship has the right to:
 - a. Reject any application that does not meet the minimum criteria or if the application is not completed in its entirety;
 - b. Reject any application from an Organization that in the past has been non-compliant with any of the policies found within this document;
 - c. Reject any application that includes a Registered Sponsor who is considered non-compliant with the Office of Apprenticeship.
 - d. Contact the applying Organization for further clarification on any item; and
 - e. Consult with any relevant industry parties such as listed RA sponsor on the application, State Apprenticeship Council, or industry associations.
6. Applications will be reviewed by at least two staff of the Delaware Office of Apprenticeship including final approval granted by the Apprenticeship and Training Manager.

Once approved, the Organization will receive a certificate documenting approval. This certificate will be valid for two (2) years. After the expiration, the Organization will need to re-apply.

VI. Policies

1. **Renewal of Application.** Programs will be valid for two (2) years. After the expiration, the Organization will need to re-apply. If the Office of Apprenticeship does not receive an application within 90 days prior to the expiration date, it will deregister the program at expiration.
2. **Monitoring.** Pre-Apprenticeship programs agree to participate in monitoring of activities, to occur no more than twice annually, which may consist of face-to-face interviews with Pre-Apprentices and observation of the program. See Attachment C for example of survey question

for participants. Note that nothing in this section prohibits the Office of Apprenticeship from responding to a complaint.

3. Reporting. The Pre-Apprenticeship program is required to submit quarterly reports, occurring two (2) weeks after the close of each calendar quarter, using the template provided by the Office of Apprenticeship. The report shall be cumulative and at a minimum consist of participant information, start and end dates, and completions. See Attachment D for the reporting template.
4. Certificates. All registered Pre-Apprentices who successfully complete an approved Pre-Apprenticeship program will receive a Pre-Apprenticeship Certificate. The certificate will detail advanced standing in related instruction. In order for certificates to be completed in a reasonable and timely manner, submission of the quarterly reports is required.
5. Advanced standing for Related Instruction. Any program that offers advanced standing at one Vo-Tech Adult Division will be accepted in all three counties.
6. For the purposes of Pre-Apprenticeship, Delaware will allow approval of Pre-Apprenticeship programs that are in partnership with a Registered Apprenticeship Program approved by USDOL or any USDOL recognized State Apprenticeship Agency in other states. In this instance it must be reasonable that pre-apprentices can become Registered Apprentices regionally (Delaware and surrounding states).
7. Complaints. The following is the process to file a complaint against an approved Pre-Apprenticeship program. If an individual(s) feels that the Pre-Apprenticeship program is not fulfilling their obligations as described in these policies and procedures, the individual(s) may file a complaint against said Pre-Apprenticeship program. The individual(s) must submit a written complaint that includes his or her complete name, phone number, address and the complete name, phone number and address of the Pre-Apprenticeship program and a summary statement of the alleged grievance. The Delaware Office of Apprenticeship will make contact with the Pre-Apprenticeship Program and claimant to notify them that the complaint was received. The Delaware Office of Apprenticeship may request additional information to investigate complaint. Delaware Office of Apprenticeship has the right to revoke a Program's Pre-Apprenticeship status as a result from any complaint investigated. The Delaware Office of Apprenticeship may refer claimant to Delaware Industrial Affairs or USDOL if claim is not related to these policies and procedures.
8. Appeals. The following is the process to appeal the denial of a Pre-Apprenticeship program. Any proposed Pre-Apprenticeship program may, within fifteen (15) working days, request a hearing before the State Apprenticeship Council. If the proposed Pre-Apprenticeship program requests a hearing, the Manager of Delaware Office of Apprenticeship or his/her designee shall advise the chairperson of the Council, who shall convene the Council, for a hearing for the purpose of making a determination on the basis of the record and proposed findings of Delaware Office of Apprenticeship. The Manager of Delaware Office of Apprenticeship will provide notice of the scheduled hearing to the assigned Office of Apprenticeship Deputy Attorney General as well as the Appellant. The hearing will require the presence of as least a quorum of the State Apprenticeship Council, Office of Apprenticeship Staff and Appellant. This determination shall be subject to review and approval by the Administrator of Employment &

Training, whose decision shall be final and binding. A final determination will be sent to the Appellant within 90 days of the hearing date.



Pre-Apprenticeship Program Application

Apprenticeship@Delaware.gov | (302) 761-8328
4425 N. Market Street | Wilmington Delaware 19802

Section A: Applicant Information

1. Company Name:

2. Address and Phone Number:

3. Primary Contact Name:

4. Primary Contact Phone and Email:

5. Primary Contact Title:

Section B: Program Information

1. Program Title:

2. Occupation:

3. Program Length:

4. Projected Annual Enrollment Total:

5. Program Days and Hours of Operation:

Sunday_____ Monday_____ Tuesday_____ Wednesday_____ Thursday_____ Friday_____ Saturday_____

6. Target Service Population/Geographic Area:

7. Program prerequisites for entry:

8. Address and Phone Number of Where Pre-Apprenticeship Training Will Take Place:

Section C: Component 1: Employer Engagement

1. In partnership with which Registered Apprenticeship program? Please attach a letter of support from the Registered Sponsor.

2. Please explain how the program provides job placement support for participants focused on Registered Apprenticeship Sponsors.

3. Please explain any additional alignment, examples include formalized agreements with Sponsors to enter directly into Registered Apprenticeship Programs, collaborative promotion of RA as a preferred means for employers to develop a skilled workforce and create career opportunities for individuals, and use of established industry councils or program advisory committees.

Component 2: Approved Training and Curriculum

1. Please explain how your training and curriculum aligns with the industry or occupational standards/needs (including reading and math skill needs).

2. Please describe the work-readiness or “soft skills” aspect of the curriculum.

3. Please describe the career exploration activities aspects of the program such as occupational interest assessments or specific career and industry awareness workshops.

4. Please describe how you will provide meaningful hands on training.

5. Do you plan to have Pre-Apprentices on the job site? Yes ☐ No ☐

6. Please describe demonstrated linkages to supportive services to alleviate employment barriers such as addressing mental health and substance abuse needs, support in obtaining a driver’s license, etc.

7. Please attach an outline of your curriculum.

8. Please provide your letter of support or formalized agreement between your program and the related instruction provider of the Registered Apprenticeship Program.

9. Does your program allow for advanced placement of a Registered Apprenticeship Program? If yes, please attach a formalized agreement between your program and related instruction provider.

Yes ☐ No ☐

Component 3: Expansion to Underrepresented, Disadvantaged, or Low-Skilled Populations: The program must undertake one of the two following, please answer either 1, 2, or both.

1. Do you provide or make individuals aware of educational and pre-vocational services? For example, specific career and industry awareness workshops, job-readiness courses, English for speakers of other languages, math tutoring, etc.

Component: Expansion to Underrepresented, Disadvantaged, or Low-Skilled Populations: The program must undertake one of the two following, please answer either 1, 2, or both (cont'd.).

2. Please explain your strong recruitment and outreach focused on underrepresented, disadvantaged, or low-skilled populations in Registered Apprenticeship programs.

Section D: Organization Information

Please indicate whether your organization is:

1) A public entity

Yes ☐

No ☐

2) A private for profit organization, if yes, please attach a copy of your Delaware Business License.

Yes ☐

No ☐

3) A non-profit organization, if yes, please provide documentation of your 501(c)(3) status.

Yes ☐

No ☐

Section E: To Be Filled Out by Applicant

Signature:

Printed Name:

Date:

Section F: Checklist

Pre-Apprenticeship Sponsor Application Completed

Letter(s) of Support from Registered Sponsor

Letter(s) of Support or Formalized Agreement with Related Instruction Provider

Outline of Curriculum

Delaware Business License or Documentation of 501(c)(3) status, if applicable

After Approval: Minimum Insurance Requirements/Certificate of Insurance (DOL to the Department of Insurance to confirm requirements are met).

Section G: To Be Filled Out by Office of Apprenticeship

Date Received:

Date Program Approved:

Approval:

Reviewed By:

Required Documents for Submission Checklist

To aid the Apprenticeship staff the following is a checklist of items that should be submitted in order to be considered for the Pre-Apprenticeship Program. These have been incorporated into the Pre-Apprenticeship Application.

Item	Completed/Submitted
Pre-Apprenticeship Sponsor Application Completed	
Letter(s) of Support from Registered Sponsor Included	
Letter(s) of Support or Formalized Agreement with Related Instruction Provider Included	
Established Curriculum Provided	
Delaware Business License or Documentation of 501(c)(3) status, if applicable	
After Approval:	
Minimum Insurance Requirements/Certificate of Insurance (DOL to the Department of Insurance to confirm requirements are met)	

Pre-Apprentice Questionnaire

Name (Print): _____

Trade: _____

Program: _____

1. What do you like about the program?

2. Are you satisfied with the classroom instruction?

Yes No

3. Do you have any suggestions to improve?

4. Would you recommend this Pre-Apprenticeship course to someone you know?

Yes No

5. Does the instructor have a positive attitude while teaching the class?

Yes No

6. Are your questions answered?

Yes No

7. Do you feel that you have improved your skills?

Yes No

8. Do you feel more prepared to enter the workforce?

Yes No

9. Overall, I am satisfied with the program.

Yes No

10. Do you have an understanding of what Registered Apprenticeship is?

Yes No

11. Comments

Pre-Apprentice Information Template

Program Name	Pre-Apprentice Name	Birthdate MM/DD/YY	Last 4 of SSN	Start Date MM/DD/YY	Estimated Completion Date MM/DD/YY	County of Residence	Email	Gender: M, F, or Do not Wish to Disclose	Age: 16-24, 25-54, or 55+	Disability? Y, N, Do Not Wish to Disclose	Veteran Status: Y, N, Do Not Wish to Disclose	Ethnicity: Hispanic: Y, N, Do Not Wish to Disclose	Race: Black/African American, Asian, American Indian/Alaska Native, Native Hawaiian/Other Pacific Islander, White, Do Not Wish to Disclose	Highest Level of Education Achieved	Low Skilled
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