

STATE BOARD OF COMMUNITY COLLEGES
Policy Recommendation on Registered Pre-Apprenticeship
FY 2025-2026

Establish the criteria for registering pre-apprenticeship programs in North Carolina.

Request: The State Board of Community Colleges (SBCC) is requested to approve a new policy recommended by the ApprenticeshipNC Council. The purpose of this policy is to establish the criteria for registering pre-apprenticeship programs in North Carolina.

Strategic Plan Reference:

Goal 4: Economic and Workforce Development

Provide education, training, and credentials to develop the most competitive workforce in the nation.

Strategies: 4.1.1, 4.2.1 & 4.3.1

Background/Rationale:

US DOL does not regulate Pre-Apprenticeship. DOL has provided a Training and Employment Notice (TEN 23-23 dated March 5, 2024).

ApprenticeshipNC has been registering Pre-Apprenticeship (PA) programs since 2014 without a documented definition or policy. The verbal guidelines have been that the purpose of a PA is to lead to selection and success in a Registered Apprenticeship Program (RAP). The PA must be connected with a RAP and should include a combination of on-the-job learning and related classroom instruction.

In 2024, it became clear that a specific policy was needed because of recurring problems with pre-apprenticeship programs. These problems included:

- **Lack of clear guidance:** There wasn't enough direction on how pre-apprenticeship programs should operate.
- **Failed connections:** Some pre-apprenticeship programs reportedly didn't successfully connect participants with a Registered Apprenticeship Program.
- **Geographic disconnect:** In other cases, the associated Registered Apprenticeship Program was located too far away, making it impractical for participants.
- **Insufficient training:** Some pre-apprenticeship programs only offered classroom training, lacking the crucial hands-on or work-based experience needed for a true apprenticeship.

Essentially, these issues revealed a need for a clear, standardized policy to ensure pre-apprenticeship programs are effective, well-connected, and provide comprehensive training.

The proposed policy has iterated since 2024 including feedback from a sub-committee of Community College Presidents and the Apprenticeship Council.

The proposed policy was approved by the Apprenticeship Council with a vote of seven in the affirmative and one opposed. There are eleven voting members on the council, of which three were absent from the discussion and have not been actively participating.

Appendix

Office of Apprenticeship Ten 23-23 Excerpts

Although pre-apprenticeship programs are not intended to be prescriptive or rigid, they should ultimately provide education and workplace-simulated training that can prepare individuals to enter a RAP. Pre-apprenticeship programs may also be referred to as Apprenticeship Readiness or Apprenticeship Preparation programs.

Framework

1. Partnership with Registered Apprenticeship program sponsors.
2. Sustainability through partnerships.
3. Meaningful training combined with hands-on experience replicating a workplace that does not displace paid employees.
4. Access to career and supportive services.
5. Strategies that increase Registered Apprenticeship opportunities for underrepresented or underserved populations facing significant barriers to employment in the Registered Apprenticeship labor force.

Pre-apprenticeship program (29 CFR 30.2) – means a training model designed to assist individuals who do not currently possess the minimum [academic or skills] requirements for selection into an apprenticeship program to meet the minimum selection criteria established in a program sponsor’s apprenticeship standards required under part 29 of this chapter (29 CFR part 29) and which maintains at least one documented partnership with a Registered Apprenticeship program. It involves a form of structured workplace education and training in which an employer, employer group, industry association, labor union, community-based organization, or educational institution collaborate to provide formal instruction that will introduce participants to the competencies, skills, and materials used in one or more apprenticeable occupations.

WIOA Final Rule published in 2016:

What is a pre-apprenticeship program? (20 CFR 681.480) -- A pre-apprenticeship is a program designed to prepare individuals to enter and succeed in an apprenticeship program registered under the Act of August 16, 1937, (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.) (referred to in this part as a “registered apprenticeship” or “registered apprenticeship program”) and includes the following elements:

- a. Training and curriculum that aligns with the skill needs of employers in the economy of the State or region involved;*
- b. Access to educational and career counseling and other supportive services, directly or indirectly;*
- c. Hands-on, meaningful learning activities that are connected to education and training activities, such as exploring career options, and understanding how the skills acquired through the coursework can be applied toward a future career;*
- d. Opportunities to attain at least one industry-recognized credential; and*
- e. A partnership with one or more registered apprenticeship programs that assists in placing individuals who complete the pre-apprenticeship program in a registered apprenticeship program.*

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No.	Policy 006
Name	Registered Pre-Apprenticeship Policy
Audience	Sponsors, Employers
Purpose	To establish the criteria for registering pre-apprenticeship programs in North Carolina.
Effective Date	DRAFT
Last Reviewed By	Chris Harrington, James Yarley
Date of Last Review	DRAFT
Key Terms	<ul style="list-style-type: none"> • Appendix E: The <i>Connection to a Registered Apprenticeship Program</i> form, which indicates a registered apprenticeship program that will interview or accept candidates who complete an affiliated pre-apprenticeship program • Registered pre-apprenticeship program: A program approved by a state apprenticeship agency that prepares and assesses candidates for a registered <i>apprenticeship</i> program (RAP)

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Goals

A registered pre-apprenticeship program will:

- Prepare an individual for selection and success in a registered apprenticeship training program.
- Enable the participant to be **eligible for the state tuition waiver** if they are:
 - Enrolled before high school graduation
 - Registered in a registered apprenticeship program within 120 days of graduation
- Broaden the recruiting pool for employers and form relationships between employers and potential apprentices.

Minimum Requirements

The following are the minimum requirements to register a pre-apprenticeship program. It must:

1. Be **connected with at least one registered apprenticeship program (RAP)** as further defined below
2. Include **100 hours of work-based and/or work-simulated learning**
3. Include **9 hours of supplemental education** (classroom training)
4. Be **registered with ApprenticeshipNC (ANC)** as the State Apprenticeship Agency

A sponsor may increase the requirements of their specific program.

For the USDOL's guidance on pre-apprenticeships, see the Training and Employment Notice (TEN) 23-23, March 5, 2024.

Further Clarifications

Registered Apprenticeship Program (RAP) Connection

For a pre-apprenticeship to be considered connected with a registered apprenticeship program, the following conditions must be met:

1. The registered pre-apprenticeship site for work-based learning must **be within a commutable distance** (generally less than a one-hour drive) of the RAP's location.
2. The registered pre-apprenticeship's **occupation** must match the connected RAP.
3. The RAP employer must review and formerly agree to the pre-apprenticeship standards, while stipulating at least one benefit that a pre-apprentice completer will enjoy. For example:
 - a. Grant an interview.
 - b. Grant direct entry (specific application and selection criteria).
 - c. Grant advanced standing/credit.
4. The RAP employer must provide the **estimated** number of apprentices they plan to recruit from the registered pre-apprentice program(s) to the pre-apprenticeship program sponsor so the information can be shared with the pre-apprenticeship candidates/participants. This information would be updated annually. This is not a commitment and not a limiting factor but important information so that individuals understand that entry into the RAP could be highly competitive.

100 Hours of Work-Based and/or Simulated Learning

1. The work plan must:
 - a. Be clearly defined to include training that will occur, and/or skills developed
 - b. Stipulate if the work-based experience will be in a workplace, simulated, or a combination thereof
 - Ideally, the training will occur **in an employer's workplace**.
 - *Simulated work-based experience* includes environments designed to emulate a workplace environment.
 - Examples:
 - A lineworker learning in a non-electrified setting that emulates placing poles and hanging lines.
 - A cybersecurity pre-apprentice working in a lab designed to emulate real-world threats.
 - A lab technician working in a simulated cleanroom.
 - Include at least **100 hours** in the workplan. This can be a combination of work-based and simulated experiences.
2. The pre-apprenticeship agreement must stipulate **if there will be any compensation**, including the amount.
3. The work plan must specify **who will conduct the work-based training**.
 - Examples:
 - A company-provided mentor
 - An industry-experienced instructor

Nine Hours of Supplemental Education

The program must clearly:

1. Define the course(s) and material to be covered
2. Identify who will provide the instruction

ApprenticeshipNC Pre-Apprenticeship Program Registration

- Programs and participants **must be registered in North Carolina Registered Apprenticeship Network (NCRAN)** to be considered valid.
- Program registration will include documented RAP employer participation and how it connects with their program.
- Completers will earn a certificate of completion from ApprenticeshipNC as the State Apprenticeship Agency.
- Pre-apprenticeship programs are subject to review during the related RAP(s) assessment.
- **ANC will only be responsible for program and registration documents;** any other agreements that may be required are the sponsor's responsibility.

Any pre-apprenticeship program already registered *prior to* this policy **will be granted twelve months** to adapt to the new standards.