**WorkforceGPS**

**Transcript of Webinar**

**Scaling Up: Expanding Registered Apprenticeship Programs Through U.S. DOL Approval**

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ZODIE MAKONNEN: Welcome to our webinar today. The topic of our webinar, "Scaling Up: Expanding Registered Apprenticeship Programs Through U.S. DOL Approval." I know this has been a topic of interest to many of you over the last two years. And we're hoping this webinar will help answer many of your questions, and provide you with an overview of the DOL Registered Apprenticeship Program approval process. We have a great panel set up. And we're lucky to have our panelists with us our today.

Our panelists are subject matter experts in apprenticeships and bring to us a wealth of knowledge, information, and insight into the DOL RAP approval process. They are also resources that are available to you as grantees to help facilitate and assist you in your journey as you get your programs approved. We will provide details on the role of the Office of Apprenticeship subject matter experts and how they can assist you later on in this webinar. But for right now, we want to encourage you to reach out to your federal project officer, or FPO, to get you in touch with your OA SME. They will be invaluable to you.

Let me introduce or panelists. With us today we have Doug McPherson, who is a

supervisory apprenticeship and training representative. We have Charlie McNeil, who is a

deputy regional director, Region 1; and Ron Leonard, deputy regional director, Region 2. We also have Wanda Monthey, who is a technical assistance coach with Manhattan Strategy Group. And Wanda will be part of the panel in also helping to facilitate the discussion today. I will now turn it over to Wanda. Wanda?

WANDA MONTHEY: Thank you, Zodie. The goal of your projects in the Scaling Apprenticeship grant is to create and expand apprenticeship programs. Grantees benefit from having national approval from DOL even if they are in a state registration state. When there is reciprocity – as there is in many places – between the state and the national programs, it allows you to expand your registered apprenticeship programs easier.

While we're not going to cover it in this webinar, having national approval will also allow for acceptance for veterans benefits for apprenticeship programs through the VALOR Act. Approval in one place does carry approval across the country. Our objectives are today to provide you with an overview of the national and the state landscape for approval of registered apprenticeship programs to help you gain the knowledge of the national process for registered apprenticeships.

And that's why it's great that we have three people from the Office of Apprenticeship to give us the real down-and-dirty; also, for you to learn of supports available to help facilitate that process; and for you to get advice on RAP registration directly from the Office of Apprenticeship subject matter experts. So the first thing we're going to show is the overview of the Registered Apprenticeship Program landscape in the U.S. All RAPs are regulated and overseen by either the U.S. Department of Labor National Office of Apprenticeship, or by a state agency.

And you all know which kind of a state you are trying to implement the grant in. The registration body is determined by each state. And there are six regional apprenticeship offices across the country from the U.S. Department of Labor that will provide apprenticeship support to all the states in their region regardless of whether you have state approval, or if you are working for a national approval. So keep this in mind – you always have access to your regional office.

This is a map of states that are state-approving agencies, as well as the federal approving agencies. The blue are federal state offices. There are about 27 states and territories that are registered through the Office of Apprenticeship. There are 28 states and territories that are state-approving. And these can change over time. A state may decide that they just want to use the federal approval process or they want to go off on their own. So make sure that you check the website as you move into a federal approval.

So with the support of the Office of Apprenticeship, we're going to go through the process step by step that you will need to follow. We hope that we can take away some of the concerns that you have and take away the appearance of it being so big you can't do it, and give you the support you need that will help you make it a smoother process. So why do this? One, the streamlined registration process has been put in place by the Department of Labor.

I have put through a couple of apprenticeship programs on the old system. This is much easier. And with the assistance, the subject matter experts are there to help you, as well as some of you have said that you were asked to contact the ATR – so either one of those people. We're going to encourage you to talk to your SME. And they provide access to multiple employers across the country, which I know is a concern of a lot of you.

The national registration is accepted in 27 states; and a lot of times there is reciprocity between the nationally registered program and their own state program. Once you've done this once, the next ones will be easy. We will be very optimistic because I believe this is a big improvement from the past. So I'm going to turn it over to Ron now, who is going to take you through the steps that you follow to make it an easy process. Ron?

RON LEONARD: All right. Thank you, Wanda. This is a simplified look at the process to follow. Sometimes Steps 1-4 will follow a different order depending upon where you are in the development of your program. We know that as part of the SA project, many have completed Step 2 before or concurrently with Step 1. So this is the process. So you may have reached out to identify an occupation or an employer one before the other, but essentially this is the normal flow. All right?

And they are – engage employers, identify an occupation, seek the support of your OA SME, establish program components, prepare application, and then submit the application. Next slide, please. OK. For a RAP to be approved as a national program, it must engage multiple employers in the review and development of the Registered Apprenticeship Program application – essential. Employers do not have to commit to implementing the RAP to be part of the review process. Employers should represent national employers, or exclude employers from additional states. Next slide, please.

While most apprenticeship programs begin with employers, the scaling apprenticeship grantees identified the occupations as part of their statements of work when they submitted their application. As any changes in occupation must be approved by FPOs, the federal project officers, we will be focusing on registration of RAPs identified by the grantees. U.S. Department of Labor has established apprenticeships in many occupations in a variety of industries, and offer training plans that have be vetted by industry leaders.

Browse for occupation finder to find your preferred occupation and determine if it has already been approved for use in registered apprenticeship program. Occupations are listed on apprenticeship.gov, but there are some in paper or hard-copy format. And certainly, talk to your SME if you need to get ahold of something like that that can help you. A streamline process has been developed for boilerplates from 100 pages to essentially 8 pages. So it's been quite an improvement over the years in apprenticeship.gov. And this page right here is a great place to begin. OK. Next slide, please.

When you search for an occupation, this is the screen that'll come up. As you can see from the left column, it shows that it is already approved as a registered program. And if you look at the top of that column where it says, "registered," you have the star there. OK? It will then let you download a sample work process schedule and give you the list of competencies as approved. Now this is just a sample. Certainly, it can be expounded upon.

Also, along with the occupations that you're looking at, there may be alternative occupation titles that are listed, which also may be brought up for consideration or something you want to use. Here on this sample on this slide shows recently approved apprenticeship occupations in this sample, but also most viewed occupations. There's a quick link to the most recent approved and viewed occupations. All may be relevant to the industry sectors on this grant.

Identify employers to engage – if no apprenticeship is approved for the occupation, you may get this result, disappointing. This is where your SME or ATR can really help you guide along. So it may be something that you may need to develop from scratch. Or there may be some other options available and they will have a better handle on that. Engage SMEs at Office of Apprenticeship. Office of Apprenticeship offers technical assistance throughout the process.

There are types of SMEs in various areas. Support is offered. And, of course, the timing is everything for getting your program together. Keeping in the loop your FPO, the sooner you get the FPO's help, the smoother the process is going to be. Once you determine that the occupation is already approved program or not, you contact your FPO. Your FPO will be able to get in touch with your regional SAA.

Reach out to the OA regional staff. The different offices are listed on the website. They are very knowledgeable. The ATR, the apprenticeship training representative, will help with the apprenticeability process if it's not an already recognized occupation. With an SAA – that is a state approving agency, whereas the state approving agency is the actual registration authority – they can be called as consultants or navigators. Next slide. All right. Now I'll turn this over to Doug.

DOUG MCPHERSON: Thanks, Ron. So Step 4 – our mix and the biggest step is to establish the components for your program. In addition to the information shown on the slide, you approve the apprenticeable occupation or drive what is more apropos for national scale. The main issue is around suitability. Some occupations are more suitable for use within national guidelines for apprenticeship standards, as opposed to national program standards.

National guidelines standards are essentially a template that is certified nationally and registered locally, and then adjusted to conform to state and local laws. The boxes at the top of the cover page of the standards will indicate either national guidelines standards, national program standards, or local standards. These are accessible either on standards builder, or one of our ATRs can provide technical assistance in completing a hard-copy version. Next slide, please.

Next, users should indicate an apprenticeship training approach. As shown here, apprenticeships can be either time-based, competency-based, or hybrid; which includes elements of both time- and competency-based approaches. This will make a difference on the work process schedule since all three approaches have slightly different elements. Next slide, please. OA has developed a streamlined process with an online template that makes the gathering of information easier.

The work process schedule contains the required tasks or competencies necessary to achieve proficiency. The hours or competencies can vary depending upon the occupation. Additionally, OA allows for a 25 percent adjustment for reductions or increases to time-based or hybrid occupations. Next slide, please. The approach you select will drive the template that you populate. Once you select your approach, you will be guided to next steps. The next few slides will give you an idea as to what to expect at each interval during the process. Next slide, please.

This template is prepopulated if you have chosen an approved occupation. If you are submitting a new occupation, you can either enter your skills and competencies, or use O\*Net to develop your processes. Those occupations that have not been approved will need to go through our apprenticeability determination process, providing that OA doesn't have a close match for the proposed occupation. Next slide, please.

Next, the related instruction competencies are entered. If you are using objectives or topics from credit courses, it may be advantageous to review those objectives and limit the number that you include in the related instruction outline. You don't have to list all the content of each course. Select the ones that are directly applicable to the occupation. I will now turn it over to Charlie to cover Step 5. Charlie?

CHARLIE MCNEIL: Thanks, Doug. So with program components established, we'll go through these other steps as far as identifying who will provide the related instruction – as Doug had covered earlier – specify a probationary period, define wages, and outline the selection processes, etc. So the probationary period requires usually 25 percent of time, or one year – whichever is less – is required by every sponsor for the process of the program.

The selection procedures they will utilize as part of recruiting for the filing of their positions – whether from within or without the company. Selection procedures are required by the Office of Apprenticeship regardless of the final number of registered active apprentices that will be served. Once selection procedures have been defined, sponsor users have officially completed adding a single occupation end to end for registration and apprenticeability. If they desire, they may continue with the process or add another occupation. Next slide, please.

So your application must have a wage scale. Note, wages need to increase progressively over the period of the apprenticeship. It is also a good idea to put a statement that wages and the scale may be varied on the local labor market. Next slide. It is important to be clear about the selection process. This protects you and the employer and makes the process transparent. It is important to remember that there is a significant list of records that must be kept by the sponsor. Next slide.

After this, you'll submit the application. Ninety days – when you have a complete set of signed by the submitting entity, we have 90 days to register that decision. National guidelines versus national standards vary on how they are dealt with the program. Next slide. And I'll turn it over to Wanda.

MS. MONTHEY: I think on the previous side, still that number one can help. Contact your OA person and use them. What we're going to do right now is we've come up with some scenarios listening to you coaches; we have spent a lot of time talking with all the grantees and have heard several scenarios. We have defined four scenarios that I'm going to read. And then the OA team will respond and make it easier for you to think ahead and plan.

OK. The first one is for a brand-new program. There is an employer who wants us to create and implement a registered apprenticeship program utilizing occupations in robotics. And somebody out there probably knows who you are. They want to have this in all of their plans that are across the country. It's not on the OA-approved apprenticeable occupations list. So in order to have that national registration, what should be the grantee's next step, Charlie?

MR. MCNEIL: So the biggest part is if it cannot be located on the apprenticeability list – is one, as we said – I'll reach out to an apprenticeship and training representative. They can help you locate, possibly, that occupation that is being utilized is utilizing a different name that may be the actual approved apprenticeable occupation. So you'll need to go through and work with a representative assigned to identify the occupation for utilizing either our occupation finder or working directly with the ATR.

So we've established many different occupations in a variety of industries that have been vetted by industry leaders. Now, sometimes those industry leaders may say that in utilizing one name, and we utilize a different name for an occupation. So that's how this can be help in there. Also, in utilizing O\*Net, that could be another way to find alternative names for that O\*Net code that that occupation is approved for. So that's what we would utilize.

If the occupation's not approved, then we're going to have to go through the whole process of apprenticeability. And, again, the ATR is going to help you do that in establishing your package. So the package checklist utilizes – we have an apprenticeability checklist, which will go through different aspects of it – putting together the actual work process that is being utilized, the related theoretical instruction that's provided being utilized to help support that work process.

And also, if it's not an occupation that's on or listed upon in O\*Net – but say, it relates to a robotics technician occupation in all actuality – we can actually have that name tied to that O\*Net code and be utilized for that aspect.

CFR 29.4 provides – which is in our regulation – CFR 29 provides the criteria for apprenticeable occupations. "An apprenticeable occupation is one which is specified by industry and which must involve skills that are customarily learned in a practical way through a structured, systematic program of on-the-job supervised learning..." So those are some of the steps there to be utilized in order to register or to utilize or get a new program or find that occupation that is needed.

MS. MONTHEY: So their first step would be to contact your SME, obviously. And then see if that occupation is already approved. And if it's not approved, then look at the apprenticeability, which they will never find in the dictionary.

MR. MCNEIL: Right.

MS. MONTHEY: So in very short words, can you say how they will know if it's apprenticeability?

MR. MCNEIL: So in the occupation – yeah – in the apprenticeability factor – so the utilizing occupations finder, it will actually provide a little gold star there that says, okay, yeah, this is an apprenticeable occupation. If the star is not located there, it'll also give other suggestions to occupations that are similar to the occupation being named, if you will, by industry and so forth. So that is one way that could be located easier is just using the occupation finder.

Also, in O\*Net, it will actually tell you whether that – if you look further down in the O\*Net listing and all the little areas and tasks and so forth, looking down by the SVP, it will actually say that it's an apprenticeable occupation or not in there. And you can click on there; it will bring you to the occupation. So those are other ways other than using the SME to help locate that possible occupation for utilization.

MS. MONTHEY: OK. Thank you. And everybody will be able to ask questions at the end, because I think we're moving right along here. OK. The Scenario 2 is you have your program approved at the state level or in your state, and now you want OA approval. One of the grantees has a state registered program. And now they have other states interested in becoming a partner with them and implementing the program in their state. But those states are national OA approved. So how does OA work with the state agencies? And can you talk us through the process of submitting the application? And, Ron, this one goes to you.

MR. LEONARD: Sure. We work very closely with the SAAs. And the first thing I realized is each SAA is a little bit different. Some are vastly different than others. For instance, in the process, you may find some states more cumbersome to work with and others not. It depends upon how they do things. For instance, one state may have an introductory procedure where your completed package is submitted to the council for review, but not voted on for approval until a later date.

Other councils may not meet monthly. They meet every other month or every third month. So there are varying processes. And within that, that's part of their vetting process. Whereas, to a certain degree, they each look at the programs. They look at the employers. They look at various aspects – whether there are any current problems with the employer, any problems with the state and so forth, that they've identified in their other agencies.

And then it's presented at the respective councils. Some are handled by simply the SAA staff. And the conclusion of whether or not it's approved as a program is then essentially presented to the council. So there's quite a variance there.

MS. MONTHEY: Now, what do they do if they want to take that approved program and get approval from OA as a national program? And what about the employers? Do they have to go to a national population of employers to do that?

MR. LEONARD: Well, the employers they currently have with the program can stay with the program. Quite frankly, this is something you may want to talk to the employers about. OK? There may be varying opinions with that essentially. Then the process continues on. Submitting what they have, they fully fulfill all the requirements for a national program. However, there may be some things that need to be reviewed or tweaked. And the SME will help guide them through that process.

MS. MONTHEY: OK. Then let me ask you if the tweaking is required by OA, does that mean they have to go back to their state from your working with other states? Does that mean they're going to have to go back to their state and get approval for the tweaking?

MR. LEONARD: Well, if they're going for a national program, it'll be self-contained. So essentially, there's no need to go back to review and have the state redo their – we work in close relationship with the states. And if there is anything that needs to be adjusted, we certainly have that identified by the state. But I doubt – quite frankly, it doesn't happen very often.

MS. MONTHEY: Great. And if it's exactly for one of the nationally-approved occupations and it flows through the process just like a new application – but do those standards built in – they could just enter it right through that just like they would if wasn't, it was brand-new, right?

MR. LEONARD: That is the absolute perfect situation right there.

MS. MONTHEY: OK. So then Scenario 3 – thanks a lot, Ron – so 3 – this is very common across these grants. They were allowed. Or unregistered programs were permitted. And now there's somebody who wants to take their unregistered apprenticeship program and turn it into an approved registered program. So it was approved by DOL as part of our statement of work. And we do want to plan, are planning on sustaining the program after this grant. But we want to be able to implement it in other locations. Is it the same process as a brand-new program? Or is there something different that we can do, because it's been unregistered under this grant?

MR. LEONARD: Well, the ideal situation is if it was approved, it's probably very close or exactly what's needed to become registered. In many cases, there are programs out there now and have been for years that fulfill all the requirements – they just haven't been documented. And then that's what we'll do – we'll make sure that the documentation's correct, that everything is in alignment, and then process them through. Quite frankly, it's a good way to go. Whether they know it or not, as we work with them over the years, we may urge them towards that point, because I think that the greatest benefit is having it registered.

MS. MONTHEY: And to carry off on that – is there a difference between the process that a college RAP goes through, approval process or an employer process? On the website, it talks about employer, but it doesn't talk about college. Not all of these grantees are colleges. They're different –

MR. LEONARD: Well, college, if they're from the [inaudible] sponsor, they're going to essentially have the responsibilities of a sponsor, or at least administratively run the program. However, they will be the coordinator. They will undergo reviews and so forth. So quite frankly, they will be treated as a sponsor-employer.

MS. MONTHEY: OK. Thanks, Ron. Now we'll go on to Scenario 4. And Doug gets to respond to this one. So this is an actual case. We have four grantees in health care who want to work together to develop a new RAP for respiratory technician. All of them are located in different states. All of them are OA states. And each of them will be working with their own employer partners. And there is an O\*Net code, but no approved apprenticeable occupation for RTs yet.

So now that you have four grantees, four states, all OA states, they're going to develop together, what is the most expedient way to get approval for that RAP? Would you prefer that one ATR work with all of them, one SME work with all of them together? Do they submit together? Do they submit individually, and tweak them for their own licensing in each of their states? How does it work? How will it work? This is going to happen to you.

MR. MCPHERSON: Yes. The first thing we would need to do is get the occupation approved if we haven't approved it or we don't have a match at the time of the application. The most expedient way to get an occupation approved is to front-load the apprenticeability determination request with national industry support. We allow up to nine national industry respondents to comment as to whether or not an occupation meets the criteria for an apprenticeable occupation as defined in 29 CFR 29.4.

In the absence of front-loaded support, the national office ATR will research relevant national industry stakeholders to weigh in on apprenticeability. Now, this timeframe could range between 30-90 days depending upon industry feedback.

MS. MONTHEY: And then one of the questions that's comes in – and it can tie to this as well as what aspects of that occupation are going to make it apprenticeable? And what would make it not apprenticeable?

MR. MCPHERSON: Well, we rely heavily on the feedback that we get from industry stakeholders. So if you notice, I mention "relevant" industry stakeholders. They would receive the proposed work process schedule and related instruction outline to determine if the proposed occupation meets the industry standard, the safety standards, the length of training, and whether or not it's an occupation that has typically been taught using on-the-job learning and related instructions.

MS. MONTHEY: I think that takes care of our next question that's also in the chat that, I thought you needed at least five industry-alike employers to make an occupation apprenticeable – mentorship, technical, structured, [FPS?], RTI, etc.

MR. MCPHERSON: Yes. We allow up to nine. You know, if we got only five, I mean, there are instances where, depending upon who the industry respondent is, it could carry a little more weight. For instance, if it's a regulatory agency that is supporting apprenticeship, that would carry more weight than, let's say, a company that only has tentacles in one state.

[Talking over each other]

MR. MCNEIL: I just wanted to expound upon that, because I think there's confusion also between an apprenticeable occupation in the program. The occupations are part of the program. So you can have one program with multiple occupations. The five facets that were named there are what makes a program put together – so having mentorship, related instruction, on-the-job training, employment, etc. – those are requirements for a registered apprenticeship program.

As far as an apprenticeable occupation, that goes into what Doug was talking about, is, is it typically taught utilizing on-the-job training and related instruction and so forth. That goes to the apprenticeable occupation – not so much the program itself.

MR. MCPHERSON: Right. And so in your question, you alluded to the fact that there was an O\*Net code but no approved apprenticeable occupation yet.

MS. MONTHEY: OK. That's where it just said, RT. The respiratory technician was in O\*Net but not approved. Yeah. It's not approved.

MR. MCPHERSON: Right.

MR. LEONARD: The one I was answering was one of the questions we had that came through on the chat as far as bringing up mentorship, technical structure, etc.

MS. MONTHEY: OK. We're going to open it up for questions. And really post hard ones, because this is your chance. You got three people from OA here that you can put on the spot to make your life easier. On the next slide, we have the resources that are available. And you heard several references to the CFR 29.5. There is a link to that that is the law or the regulation. So that will guide you through the process if you need to do that, especially some of you that have to take your programs through your legal offices, which [inaudible] happen this year.

So what we'd like to know is, do you have questions? And I also would like to ask Doug and Charlie and Ron if there's anything that you wish you had said back when you were talking? And we do have one question. Cheryl asks, what if something has not typically been taught using OJT and RTI but enough employers think it could be taught that way? Would that be acceptable?

MR. MCPHERSON: I'll take that. Yes, that would be acceptable depending upon the national-level industry feedback that we got regarding the occupation. So just because it hasn't been taught that way in the past, doesn't mean that there couldn't be a paradigm shift within that sector. But we will rely upon the industry stakeholders. We will rely heavily on the advice they gave regarding apprenticeability.

MS. MONTHEY: Anybody else want to comment?

MR. MCNEIL: Doug is quite thorough.

MS. MONTHEY: Good. We have a technical question here about using the occupation finder. And so far, each drop-down menu choice has produced no results. Is there something missing? And not having voice, it's hard to –

MR. MCNEIL: Obviously, you're putting in a name or they're utilizing something to try and find it, which that would have been great to include in the question not to criticize. But, Linda, if you could put that in there into the chat. And the other part is reach out to the SME. And if you're in an SAA state, or you could also reach out to our regional offices or even to the state nearby you to try and help you locate what that occupation is that you're trying to find. Might even be able to do it here.

MS. MONTHEY: And the resources, the regional offices are number one. The first bullet are the links to the regional offices. But how do they get the SMEs, because those usually have the regional apprenticeship person, but not the SME, right?

MR. MCNEIL: Correct.

MS. MONTHEY: How do they find you too?

MR. MCNEIL: To find Ron or myself using that regional office, you get there. As far as the other SMEs in the state, say like, New Hampshire or any other states, those utilizing that same website that we provided the picture of earlier where Ohio was color drawn– I already sent in that correction there – basically, it will list all the state directors. Another way to do it is actually go through – just like you did on apprenticeship.gov to find the occupation finder – you could start putting your information actually into the system. And it will send us a lead. And we'll reach out to contact you or put you in touch with another SME to assist you in doing so.

It also develops – if you have enough information, it will actually send you to start standards builder in developing that there. OK. Select multiple options from drop-down such as manufacturing. What is the actual title, though, Linda, other than just manufacturing? Is it a CNC operator? Is it a builder? Is it something along those lines? There's usually a title to the occupation that [inaudible] other than just straight manufacturing. So answering questions here at the same time.

But that's how you can find us is utilizing those websites or even the FPO. Your FPO should actually be able to connect you with the SME that's helping you oversee your grant. There's actually SME attached from the Office of Apprenticeship to each and every one of these grants to provide technical assistance in the same action that you're talking about here.

MS. MONTHEY: I have also direct us to at least four or eight of you that those scenarios came from. Do you feel that you have other questions about the process that you need to go through or that you're going through? One of the questions we did get from earlier remember was, what is the process internal in the Office of Apprenticeship? So a person sends in – it is reviewed by – before it comes into you, you like to have it reviewed by the SME, the ATR. And then it is submitted. What happens next?

MR. MCPHERSON: I can take that one. If there were, let's say, a set of national program standards that came in from the field that would get routed to my unit. They would take a look to make sure that all of the regulatory components contained in the regulation are in the standards. So we actually have checklists and things just to make sure that none of the requirements in 29.5 are omitted from the application.

Then we check to make sure that the occupation is, in fact, approved or it's a close match to what has already been approved. There are a few more checks and balances that we do. There's some internal correspondence that we attach to the package. And once that's done and I've reviewed it, I send it to my division director, Andrew Ridgeway, who also has his own checks and balances that he goes through with me.

And then once we're on one accord with the package, it's then submitted for the administrator's approval. Every now and then, there are a few questions that he has. And hopefully, as some of the supplementary documents to answer to his question is contained therein. There's like a background page, a one-page on the sponsor. We want to know if the sponsor is, in fact – the sponsor of the program, if they are the employer, or do they have signatory employers who are going to pay the apprentices.

I believe it was Charlie who mentioned that we have up to 90 days when we get a signed package to render a decision by the administrator. But in this environment, we haven't come close to that. When we get an approved package, we've been landing somewhere either before or just after maybe 30 days, maybe 30-45 days, given the system that we have in place.

MS. MONTHEY: So a comment on days – what are some of those unique – 90 days is you're supposed to have it done in. What are unique things that might extend that? What kinds of things could? Because there are some people out there who are past the 90 days. What are the things that you think might stop or delay that?

MR. MCPHERSON: You know, every situation is unique. One of the things that could delay it – let's say, for instance, you get a package and it appears as though someone tried to stretch the O\*Net code to fit an occupation to kind of circumvent going through the apprenticeability process. There could be time spent trying to reconcile whether or not this occupation does, in fact, meet this O\*Net code.

Or you could have an instance where they don't have the full package assembled. When we get national program standards and it's a sponsoring entity, we're going to have a signatory employer sign an employer acceptance agreement. We need at least three of those to go along with the package. To get your question, technical assistance is really critical in that regard if we're talking about streamlining the process and getting packages turned around, it's very important that you work closely with your subject matter expert.

And they can kind of go things in a cursory fashion. As I mentioned before, we have a checklist that we all use. But even in my unit, we have a pre-submittal checklist to make sure that everything that we need in the application is there.

MS. MONTHEY: Communication continues to happen. So somebody's not supposed to be sitting out there just waiting. If you needed something more, you would come in to them and say, we need this to process it right.

MR. MCPHERSON: Absolutely.

MR. MCNEIL: And the other part, too, is occupations can take a bit longer than just the 90-day period in getting a program registered. So going through the occupation apprenticeability status can actually take a lot longer because we're going and receiving feedback. There could be legal aspects that come up through other persons that we're reaching out to nationally that maybe disagree with that being an apprenticeable occupation. So those are things that have to be taken into consideration when we're doing for occupations – not for so much a national program or developing those standards and registering a program.

MR. MCPHERSON: That's correct.

MS. MONTHEY: We did have a question come in that seems similar. No. It just disappeared on me. Go back to these four health program, four colleges wanting to do health. The next step is to contact the SME. What one SME or multiple ones? We're talking like Colorado, New Jersey. I'm going to make up. So they're not contiguous states. They're across the country. So what's the –?

MR. MCNEIL: In that case, it would be best to work with one subject matter expert. If you're working with multiple, basically being up front and letting everybody know that, hey, I'm working with Doug Howell in California. And I've also spoken with Nicholas Burdick (sp) in New Jersey. And I've also spoken with Mike Ferrari (sp) in West Virginia. Well, the best bet is to get together. So let them know who you're speaking with so that one ATR can basically discuss, or they can all discuss together on who would take the lead on it.

The other aspect that could come into play when trying to register a national program – a national program is where are the records going to be maintained? Because that's part of a national program is that the aspect is that the records would have one location that we can go to so we can conduct our program review. So that would be in a perfect world to have that, even if they could be sent electronically.

Say, they are kept in Arizona. But when we go do our review, we're going to go to Maryland to actually conduct that program review, because all those records are maintained and sent directly to that location and accessible either via electronic, or they'll actually be there for us to review.

MS. MONTHEY: Would your advice be, though, they're all going to be independent; that one submits first, and then the other three submit for their own states?

MR. MCNEIL: Well, if they're going to register locally in each state, then work with those individual states. But a national program isn't registering it individually – you're registering it nationally; which is a requirement that the records location be in one location. Twenty or more apprentices within two years and they do have three or more employers in multiple states. So those are aspects that you're looking at.

MS. MONTHEY: OK. So it's four of you work with your coach to connect with your SMEs and figure out the easiest way for you. We do have one question and we have five minutes left. Will you describe again the difference between national guidelines standards and national program standards, and the pros and cons to the grantees for each.

MR. MCPHERSON: Sure. I'll take that one. The actual occupation – assuming all things are equal – the occupation would drive whether or not the entity – the occupation would be more suitable from the national program standards versus national guidelines for apprenticeship standards. National guidelines for apprenticeship standards are essentially a template that gets certified by our administrator, but then register locally in the places where that sponsor has local representation.

The national program is registered by the administrator. And, as Charles mentioned, that's where you need to have all of the apprenticeship records managed in one centralized location, whether hard copy or electronic. Whereas in national guidelines for apprenticeship standards, in most cases, those files are managed at the local level. So our local rep will come and conduct a compliance review on that particular local or that particular branch.

Whereas with national program standards, we do a compliance review on the whole program. So we do have some program sponsors. The pros and cons would be depending upon how much they want to keep records in house, or whether they want to push that file maintenance down to the local level. So it really depends. But the actual occupation within the standards will kind of dictate whether or not it's more appropriate to go on the national program standards versus national guidelines standards or vice versa.

MS. MONTHEY: Another question for your ATR, SME, right? OK. Well, Charles, they've been answering questions over in the main chat as well. So I think that we have another question that is tied to that same running their own programs. Last question – if any college plans to run their own programs but they're all new and develop. Only one needs to submit for approval, right? But then they all combine together.

I think what needs to happen with the four of you and your coaches is that you probably just need to contact the ATR or one of the SMEs. And then that SME can bring in the other ones. Would that be a good idea?

MR. MCNEIL: Yeah. I think where the confusion is coming in is the confusion between programs and occupations. So they can run their own programs independently, but if they all want to utilize and get that one occupation approved – respiratory therapist – I've heard that several times that people want to get respiratory therapist approved as an occupation to utilize in an apprenticeship program.

So if those four separate colleges want to utilize respiratory therapist as an occupation approved nationally, then the best that would be those four get together and submit one package for that occupation and have multiple nationally-recognized employers or industry experts to have feelers out all over. So you could have eight from each one that would really support the utilization of apprenticeship for that occupation; would that make a stronger package with all that support in it than just, say, one coming in each time. But one package all together in unity is a stronger package, Doug, would you agree?

MR. MCPHERSON: I agree completely.

MS. MONTHEY: Yay. And so I want to turn it back over to Zodie. But first, I want to say thank you to Doug, Ron, and Charlie. And I also want to thank the grantees who had some concerns and issues and gave us real-life scenarios instead of us just creating them. So thank you. And Zodie, it's 4:00 p.m.

MS. MAKONNEN: Yes, it is. Thank you, Wanda, for facilitating. Thank you so much to our panelists. And I hope everyone found this webinar helpful and got some of your questions answered. Just a reminder to contact your FPO to get you in touch with the OA SME and your reason so you can get moving on your application. Thank you so much. I'm going to turn it over to Laura.

(END)