

January 29, 2021

The Honorable Robert C. "Bobby" Scott
Chairman
Committee on Education and Labor
2176 RHOB
Washington, DC 20515

The Honorable Virginia Foxx
Ranking Member
Committee on Education and Labor
2101 RHOB
Washington, DC 20515

Dear Chairman Robert "Bobby" Scott and Ranking Member Virginia Foxx:

We, the Center for Law and Social Policy (CLASP), write to express our views regarding the reauthorization of the National Apprenticeship Act (NAA). As a national, nonprofit, anti-poverty organization, CLASP works to advance federal and state policies that promote economic security for individuals with low incomes, including people of color, opportunity youth, people impacted by the criminal justice system, and immigrants. We appreciate the opportunity to provide the committee with recommendations that help to increase greater access to registered apprenticeships, pre-apprenticeships and youth apprenticeships, particularly for individuals who face the greatest obstacles in accessing high-quality employment pathways that lead to livable wages and benefits.

Reauthorization becomes all the more important given that the COVID-19 pandemic, the economic crisis, and the increasing impacts of climate change have devastated the health and economic well-being of millions of families with low incomes. Workers of color, immigrants, young people, women, workers in jobs paying low wages, and frontline workers are among the hardest hit by these crises. Worse still, significant job losses and reductions in income have deepened racial inequities and exacerbated poverty and economic hardship for millions. Therefore, true economic recovery will require building back high-quality jobs in all sectors—including growth sectors like clean energy and the care economy—that treat all workers and working families as essential, strengthen the economy, and enable workers to meet family obligations, save for the future, and move out of poverty. It will require investments in workers through workforce development and training, subsidized jobs, and work supports such as affordable child care. It will also require a new social contract ensuring all workers can access critical workplace rights, benefits, and protections.

Over a century ago, Wisconsin created the first state Registered Apprenticeship Act and in 1937, Congress enacted the National Apprenticeship Act.¹ The NAA created thousands of Registered Apprenticeship programs and instructed the Department of Labor to promote labor standards to protect apprentice welfare.² With over 706,000 new apprentices since 2017 and an average salary of \$70,000 after program completion, Registered Apprenticeships are a successful workforce development strategy with significant economic gains.³ However, inequities, discrimination, and

barriers to entry have historically prevented, and continue to prevent, many people with low incomes, especially Black, Indigenous, people of color (BIPOC) and women, from accessing and succeeding in a Registered Apprenticeship. A 1967 study described overwhelming resistance to racial integration in apprenticeship programs.⁴ Today, while there have been improvements, apprenticeships remain largely white and male.⁵

As Congress considers NAA's reauthorization, it has an opportunity to address equity and expand access to Registered Apprenticeships, including through high-quality pre-apprenticeships. A registered, high-quality pre-apprenticeship can support students with low incomes—especially students of color and those impacted by the justice system—and promote equitable access to a Registered Apprenticeship program. For these reasons, we are providing the committee with recommendations to promote high-quality apprenticeships and pre-apprenticeship to ensure that students with low incomes, students of color, immigrants, and students impacted by the justice system can access high-quality Registered Apprenticeships.

Below are recommendations that we urge the committee to consider:

Require that all apprenticeships, including pre-apprenticeships and youth apprenticeships be registered. Across states, there is an interest in expanding pre-apprenticeships. To prepare pre-apprentices to succeed in registered apprenticeships, they must have access to high-quality registered apprenticeships. All pre-apprenticeships and apprenticeships must incorporate the types of workplace and labor standards of quality that have made registered apprenticeships successful. They must also provide direct entry into registered apprenticeships for successful apprentices.

Provide adequate compensation for pre-apprentices. Few people can afford the time or money to dedicate weeks/months to a pre-apprenticeship program without income to support themselves and their families. Unpaid programs will exclude people with low incomes, people impacted by the justice system, individuals with families and others, and result in a pool of apprentices that lacks racial and ethnic diversity. The reauthorization of the NAA can help to ensure that people of color and women fully participate in pre-apprenticeships and registered apprentices receive adequate compensation.

Eliminate barriers for women, including women of color. As of 2017, women made up just 7.3% of apprentices nationwide. Furthermore, women tend to be enrolled in apprenticeships with lower pay scales, such as childcare where the median journey person wage is only \$9.75/hour compared to \$23.46/hour, the corresponding wage for the top male apprenticeship occupation, electrician. Our nation must work to attract more women into registered apprenticeships as a career pathway and ensure that they earn wages that are comparable to wages earned by males in comparable occupations.

Eliminate barriers to entry for people with low incomes. Many registered apprenticeships impose barriers to entry for people with low incomes due high costs for tools, equipment, books, supplies, uniforms and scheduling inflexibility for parenting or commuting individuals. Scheduling barriers are especially problematic for individuals on probation and parole or community supervision. The reauthorization must provide wraparound services and robust supports to cover the costs of

childcare, transportation, equipment, and related costs that pose barriers to entry.

Support ongoing efforts to reform the criminal justice system and ensure incarcerated individuals have access to apprenticeship pathways. A National Center for Education Statistics survey found that 29 percent of incarcerated respondents wanted to obtain certificates from a trade school or college while incarcerated; 39 percent of them said the main reason they wanted to enroll was to "increase the possibilities of getting a job when released." Nevertheless, only 7 percent of the incarcerated received such certificates.⁶ The NAA must help incarcerated and formerly incarcerated individuals access the registered apprenticeships they want and provide them with other opportunities to pursue employment pathways that lead to family-sustaining jobs with benefits.

The reauthorization must support ongoing efforts at reforming the criminal justice system. This includes ensuring that occupational licensing bans do not preclude individuals impacted by the justice system from obtaining employment that they have been trained for by an apprenticeship. Individuals who are incarcerated must also be paid fair wages, and the law must help to ensure that providers do not discriminate against those impacted by the justice system.

Pay incarcerated apprentices adequate compensation in line with the minimum wage for registered apprenticeships. Apprentices who are incarcerated are often paid below the minimum wage. A 2019 Urban Institute report noted that the average starting wage for apprentices was less than one dollar an hour.⁷ Furthermore, the quality and long-term outcomes of these apprenticeships rarely match those of Registered Apprenticeships outside prison walls. The reauthorization of the NAA can raise wages—as well as labor standards—for incarcerated apprentices, bring them in line with the minimum wage or the average wage for registered apprentices, and ensure the apprenticeships are high-quality education programs.

Ensure that youths and adults with low incomes are guaranteed equitable access to established registered apprenticeships, postsecondary education opportunities, or both. Quite often, young people with low incomes, especially students of color, end up funneled or "tracked" into lower-performing or poorly funded programs and pathways. Youth apprenticeships and pre-apprenticeship programs can guarantee that pre-apprentices will have equitable access either to an established registered apprenticeship or postsecondary educational opportunities.

Incentivize and allow for greater participation of regional and local intermediaries, such as high schools, adult education providers, workforce partners, and community-based organizations in the recruitment and retention of youth of color (both in-school and out-of-school youth). Out-of-school youth, high school students, and young people of color are less likely to reap the benefits of federal and state programs and are often left behind in these programs. Regional and local intermediaries, such as workforce partners, high schools, adult education providers, community-based organizations, and other community partners can provide supportive services such as mental health and behavioral services, housing, and other supports to help increase the participation of youth of color in the pre- apprenticeship recruitment and retention process.

Dedicate a funding stream for high-quality, registered pre-apprenticeships. To continue to expand and have long-term sustainability, pre-apprenticeships must have a dedicated funding

stream that allows pre-apprentices to be adequately compensated. Such a structure would allow for greater participation of youth and adults who face the greatest barriers to employment and postsecondary education.

We thank the committee for working in a bipartisan manner to increase greater access to registered apprenticeships through the reauthorization of the NAA. We look forward to working with you and your staff.

Sincerely,



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Kisha Bird, Director, Youth Policy, CLASP

CC: Members of the House Education and Labor Committee

¹ “Apprenticeship: History and Fitzgerald Act.” United States Department of Labor Employment and Training Administration. <<https://www.doleta.gov/OA/history.cfm>>

² “Registered Apprenticeship: Federal Role and Recent Federal Efforts.” Congressional Research Service R45171. September 2019. <<https://fas.org/sgp/crs/misc/R45171.pdf>>

³ “Apprenticeship.gov” <<https://www.apprenticeship.gov/>>

⁴ “Remedies for Discrimination in Apprenticeship Programs.” <https://digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1134&context=articles>

⁵ Angela Hanks, Annie McGrew, and Daniella Zessoules, *The Apprenticeship Wage and Participation Gap*, Center for American Progress, 2018,

<https://www.americanprogress.org/issues/economy/reports/2018/07/11/453321/apprenticeship-wage-participation-gap/>
⁶ Annie McGrew and Angela Hanks, *The Case for Paid Apprenticeships Behind Bars*, Center for American Progress, 2017, <https://cdn.americanprogress.org/content/uploads/2017/04/27102832/ApprenticeshipInPrisons-briefNew.pdf>

⁷ Ian Hecker and Daniel Kuehn, *Apprenticeship and the Justice System: Adapting a Proven Training Model to Serve People in Prison*, Urban Institute, 2019, https://urban.org/sites/default/files/publication/99822/apprenticeship_and_the_justice_system_0.pdf