

March 18, 2024

Brent Parton
Principal Deputy Assistant Secretary for Employment and Training
U.S. Department of Labor
Employment and Training Administration
200 Constitution Ave NW
Washington, DC 20210

Docket No. [ETA-2023-0004](#)

Dear Principal Deputy Assistant Secretary Parton:

The undersigned organizations write in response to the U.S. Department of Labor's ("the Department") request for comment on National Apprenticeship System Enhancements. Specifically, we are opposed to the proposed elimination of the Competency-Based approach to Apprenticeship on-the-job training requirements.

As the American economy has shifted over time, jobs increasingly require validated expertise and experience. Georgetown University's Center on Education and the Workforce estimates that 72% of jobs in the United States will require some level of postsecondary education and/or training by 2031.¹ Today, roughly 50% of Americans have a postsecondary degree – leaving a significant gap between workforce demands and postsecondary attainment that will only be met through high quality workforce training programs, including apprenticeships.²

Under the existing apprenticeship rule, on-the-job training requirements can be met through one of three approaches – time-based, competency-based, or a hybrid of both. The proposed rule eliminates this choice in favor of a single approach requiring 2,000 hours of training paired with 144 hours of instructional time. We believe this change will negatively impact ongoing growth of apprenticeships into more sectors, particularly in occupations not traditionally served by apprenticeships where there has been increasing investment in this earn and learn pathway. Prioritizing time spent verses mastery of skills or content impedes the ability for training programs to act nimbly and update programs to respond to workforce changes or needs. Not only does a focus on seat-time constrain programs, it does not respect workers time nor existing skills and knowledge.

While apprenticeships were built to serve industries like construction and other trades, they are increasingly used to provide pathways into occupations such as education, healthcare, and technology. States experiencing persistent workforce shortages have used apprenticeships to build sustainable employee pipelines into high-demand occupations, and employers in those

¹ <https://cew.georgetown.edu/cew-reports/projections2031/>

² <https://www.census.gov/newsroom/press-releases/2022/educational-attainment.html>

fields are increasingly willing to hire apprentices. Apprenticeships have been able to meet these workforce demands in part because of the current competency-based on-the-job approach option.

Apprenticeships in non-traditional occupations are more likely to use a competency-based approach to on-the-job training where an apprentice's mastery of skills and knowledge is tracked, not the number of hours they logged to complete a unit or task. Employers often find the competency-based approach more nimble than time-based because apprentices are able to move through content they know more quickly and sometimes complete their apprenticeship in a shorter timeframe without jeopardizing attainment of necessary expertise. Measuring an apprentice's ability on their skills and knowledge, rather than an arbitrary amount of time is how employers engage with employees and our national apprenticeship system should be aligned, not contradictory to it. Not having to track specific hour progression can also ease administration of apprenticeship programs for small employers with less staffing capacity.

As educator shortages persist across the country, states and regions need as many tools as possible to hire and train this vital workforce. Eliminating the competency-based approach would have an outsized impact on educator apprenticeship programs, including the first federally recognized teacher apprenticeship in Camden, NJ³ and Tennessee's Grow Your Own Center (TN GYO) teacher apprenticeship.⁴ A competency-based approach is complementary to how states and regions are investing in grow your own educator pipelines that recruit school support staff who have classroom experience and professionals in the community who have needed content expertise. In a competency-based system, apprentices who enter the same program with different sets of skills and content knowledge are both able to progress through on-the-job training at their own pace and focus more in areas where they currently lack skills and knowledge.

Many other occupations benefiting from a sustainable and accessible workforce pipeline through apprenticeships will be harmed by this change, including medical assistants, licensed nursing assistants, and IT specialists. This change would also impact state apprenticeship systems, including New Hampshire's that have been favoring the competency-based approach as they expand apprenticeships to serve more sectors and occupations. Additionally, many apprenticeship programs would need to be overhauled to comply with the new time-based model and employer sponsors who prefer the competency-based approach may choose to no longer hire apprentices.

In *Skilling Up, the Scope of Modern Apprentice*, Diana Elliott of the Urban Institute wrote, "As the US seeks to expand apprenticeships, making the case to employers that apprenticeships can be an expedient and high-quality way to address their labor force needs is made easier through competency-based apprenticeships." Despite this promise, the department of Labor is proposing

³ <https://www.chepp.org/news/stories/using-apprenticeships-to-build-a-community-based-educator-pipeline-in-camden-new-jersey/>

⁴ <https://www.c-ben.org/tennessee-system-tackles-teacher-shortages-with-online-teacher-apprenticeship/>

apprenticeships take a step backwards. We urge you to reconsider and keep the competency-based approach to on-the-job-training in apprenticeship.

Sincerely,

Jamie Fasteau
Executive Director
Center for Higher Education Policy and Practice (CHEPP) at SNHU

Charla Long
President
Competency-Based Education Network (C-BEN)

Beth Doiron
Director of College Access and NHED Programs and initiatives
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