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Practices to Increase Employer Adoption of Inclusive Apprenticeship

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Registered Apprenticeship, a workforce training model that combines classroom and on-the-job training, benefits both workers and employers (Walton, Gardiner and Barnow 2022; Kuehn et al. 2021). Because of its promise as a training approach,[1] the U.S. Department of Labor (DOL) seeks to expand apprenticeship to new industries and occupations where apprenticeship is not widely used, such as health care and information technology (IT), as well as to populations typically underrepresented in apprenticeship, including people with disabilities.

As part of its 2016 Equal Employment Opportunity (EEO) rule, DOL updated rules regarding equal employment opportunity in registered apprenticeship programs. The rule set a goal that at least 7 percent of participants in covered Registered Apprenticeship programs be qualified people with disabilities. As of 2023, however, less than 1 percent self-identified as having a disability. Reaching DOL's goal requires designing and implementing apprenticeship programs that are inclusive of people with disabilities. Employers play a central role in apprenticeship, but they may lack the capacity or knowledge to ensure a program is disability inclusive.

This brief identifies practices that can improve employer adoption of inclusive apprenticeship. To start, it provides background on registered apprenticeship, inclusive apprenticeship, and potential employer misperceptions about inclusive practices. It then offers examples of inclusive practices at

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[1] "What Is a Registered Apprenticeship Program?" Apprenticeship USA, accessed September 12, 2024, https://www.apprenticeship.gov/help/what-registered-apprenticeship-program.

different stages of the apprenticeship: recruitment, onboarding, and helping apprentices succeed in and complete their programs. Findings presented in this brief are based on interviews with staff from 18 inclusive apprenticeship partners, including employers, Partnership on Inclusive Apprenticeship (PIA) and other intermediary organizations, and state- and local-level apprenticeship and vocational rehabilitation (VR) agencies. Box 1 describes the research project.

Registered Apprenticeship Programs, Inclusive Apprenticeship, and Employer Perceptions

Registered Apprenticeships provide on-the-job learning (OJL) and related instruction (RI) in an occupation and foster skills that are recognized and transferrable across employers. Apprentices are employed during their training, contribute to production, earn progressively higher wages, and receive an industry-recognized credential upon completion. Programs adhere to guidelines around the length of OJL and RI and meet other standards for registration by either DOL's Office of Apprenticeship or a federally recognized State Apprenticeship Agency.

Inclusive Registered Apprenticeship programs are designed to support access and completion for apprentices with disabilities and other underrepresented populations. Inclusive apprenticeship programs "intentionally encourage and support the inclusion of apprentices who reflect the full diversity of our communities," including disabled people (Mollica and Simon 2021). One example of an inclusive practice is Universal Design for Learning, an evidence-based framework for designing and implementing training that addresses learner differences. For example, inclusive RI ensures all training materials are accessible, while inclusive OJL pertains to accessible workplace technology and

accommodations (e.g., buying or modifying equipment). The director of California's Department of Rehabilitation cited the iPhone as an example of universal design principles in action: "We all carry iPhones. As someone who is blind, I use the blind features. The features are embedded, I don't need to add anything."

"Apprenticeships are promising for those with disabilities because pay equity and support systems are built into the system. Accessibility is about support and opportunity to individualize, and apprenticeship funnels people into roles and gives them the ability to grow into those spaces."
—PIA intermediary

Because employers hire apprentices, pay their wages, and commit to developing their technical skills through OJL and RI, obtaining their buy-in is essential to expanding inclusive apprenticeship. However, employers might harbor misperceptions about what makes a program inclusive as well as costs associated with implementing inclusive programs.

For example, employers might believe complying with the Americans with Disabilities Act of 1990 (ADA) and ADA Amendments Act of 2008 is synonymous with operating an inclusive apprenticeship program. The ADA prohibits discrimination against people with disabilities in everyday activities, including employment. It also requires employers to provide "reasonable accommodations" in the application process and on the job, when requested by qualified disabled applicants and apprentices, if doing so does not create undue hardship on the employer, defined as a significant difficulty or expense. Employers might equate nondiscrimination with inclusivity. However, inclusive practices go beyond compliance. They further expand opportunities for disabled people by actively encouraging apprenticeship sponsors and employers to recruit, hire, retain, and advance people with disabilities. If employers are unaware of the principles of inclusivity, their policies and processes may not encourage applicants and apprentices with disabilities to disclose their disability and request accommodations.

Also, employers might believe that accommodations are not needed because they do not think they have apprentices and other workers with disabilities on staff. Per the Apprenticeship Equal Employment Opportunity regulations, employers and other sponsors of apprenticeship programs with five or more apprentices must invite all apprentices to self-identify whether they have a disability at the

time of application and once hired, using a standard Voluntary Disclosure Form. Apprentices are not required to return the disability disclosure form or, if they do, they are not required to respond "yes" or "no" to whether they have a disability. Apprentices' decision not to self-identify may cause employers to underestimate the need for an inclusive workplace generally or accommodations specifically (thus leading to insufficient communications about how to request an accommodation).

Finally, employer misconceptions about the costs of accommodations can be a barrier to recruiting and hiring people with disabilities (Kuehn et al. 2021; Kaye, Jans, and Jones 2011; Bonaccio et al. 2019). These concerns are largely unfounded; 92 percent of surveyed employers reported no costs or inexpensive one-time costs associated with accommodations (box 2).

BOX 2
Cost of Accommodations

The Job Accommodation Network's web-based survey of 4,447 employers administered between January 2019 and December 2023 found that most employers reported no or minimal costs for accommodations. Of the employers who reported cost information (about 24 percent of the sample), 56 percent reported no cost, and 37 percent reported a one-time cost, the median of which was $300. Among the 7 percent of employers that reported an annual cost for the accommodations, the median was $1,925.

Source: Job Accommodation Network, "Costs and Benefits of Accommodation," (Morgantown, WV: Job Accommodation Network, April 5, 2024), https://askjan.org/topics/costs.cfm.

Promoting Inclusive Apprenticeship: Promising Practices

The Foundation for California Community Colleges states that equitable access to apprenticeship, or intentionally encouraging and supporting apprentices who reflect the diversity of communities, "is not accomplished by simply providing an open door." Instead, program designers and operators should apply an equity lens to each aspect of the program, including planning, design, staffing, outreach, and delivery (Mollica and Simon 2021). Discussions with the inclusive apprenticeship interviewees identified potential ways that employers can build inclusivity into different stages of the apprenticeship. The following sections describe promising practices for recruiting apprentices, encouraging self-identification, and helping apprentices persist in and complete their programs.

Recruiting Apprentices with Disabilities

Inclusive recruitment strategies advertise job openings widely and ensure that entry requirements and procedures are fair and equitable (Mollica and Simon 2021). However, evidence suggests employers are concerned about the difficulty of reaching diverse applicant pools (Bonaccio et al. 2019).

Inclusive apprenticeship interviewees noted that employers can take active steps to reach a broader applicant pool inclusive of disabled people by revising job opening announcements and partnering with organizations that assist people with disabilities in finding employment (box 3). Each approach is discussed below.

BOX 3

Inclusive Recruitment Strategies

- Remove unnecessary degree requirements for applicants

- Recruit from populations with higher-than-average rates of disability

- Work with organizations that serve people with disabilities to help recruit, including Vocational Rehabilitation agencies

- Ensure job opening announcements and applications include inclusive language

Source: Job Accommodation Network, "Costs and Benefits of Accommodation," (Morganton, WV: Job Accommodation Network, April 5, 2024), https://askjan.org/topics/costs.cfm.

Employers can write inclusive job opening announcements. One IT employer noted that at the most basic level, job opening announcements should describe the employer's commitment to an inclusive workplace. This same employer also suggested that job opening announcements highlight features of the work that might encourage more people with disabilities to apply, such as options to work from home or flexible schedules. Job opening announcements can also promote inclusion by clearly highlighting affinity networks, mentor programs, and the accommodations process on websites. An intermediary stated that employers that show a commitment to hiring and supporting individuals with disabilities can leave a positive impression on potential applicants.

While inclusive language is important, so are the qualifications outlined in the announcement. Listing job qualifications that are not needed for the apprenticeship could prevent diverse candidates from applying. Disabled people are less likely to have completed a bachelor's degree or higher degree

than people without disabilities.[2] In our interviews, three apprenticeship program operators suggested drafting job descriptions without unnecessary barriers to employment such as degree requirements that are not needed for the position. One insurance company started its apprenticeship program with no degree requirement because they found a bachelor's degree was not a good indicator of job success. Instead of investing resources to train new, degree-holding hires, the company began using apprenticeship to train employees for two different positions. An IT employer that operates an apprenticeship program noted that "managers dragged their feet" on the decision to discontinue the degree requirement, but the program has been successful.

Employers can also diversify their applicant pool by collaborating with organizations that focus on employment for people with disabilities or recruiting populations that have higher-than-average rates of disability. VR agencies are natural partners because their mission is to help disabled people obtain employment. Other potential partners include disability advocacy organizations, industry intermediaries, and social service providers.

California's VR program deputy director set a goal of enrolling 1,000 VR clients in apprenticeships over a five-year period. He noted that increasing apprenticeship among his agency's clients necessitated educating VR staff and employers about why apprenticeship is a good option for people with disabilities:

> "We had 22 events in the summer of 2018 that educated our staff and the community about apprentices. We've assigned subject matter experts that do regular training on apprenticeships in each of our [13] districts and if anyone has apprenticeship questions, they can find someone with expertise."

The deputy director also described outreach to employers:

> "Predominantly, we communicate that we're there to help them meet their talent needs. We approach it by saying that our consumers are an untapped talent pool and helping businesses recognize them. We say that we're there to provide short- and long-term supports to both the employer and the job seeker."

Additionally, focusing on other populations with higher-than-average rates of disability, such as veterans, can expand the pool of applicants with disabilities. According to the Bureau of Labor Statistics, 27 percent of veterans had a service-related disability in 2022.[3] One national bank's Lead Audit

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[2] "Persons with a Disability: Labor Force Characteristics—2023," Bureau of Labor Statistics, U.S. Department of Labor, February 22, 2024, https://www.bls.gov/news.release/pdf/disabl.pdf.

[3] "Employment Situation of Veterans—2023," Bureau of Labor Statistics, U.S. Department of Labor, March 20, 2024, https://www.bls.gov/news.release/pdf/vet.pdf.

National Registered Apprenticeship Program prioritizes recruiting veterans.[4] In 2022, 42 percent of apprentices in the program identified as having a disability.[5]

Onboarding and Encouraging Self-Identification of Apprentices' Disability Status

Although many employers report that they do not see people with disabilities in their applicant pools (Kaye, Jans, and Jones 2011), it is likely that some employees and applicants have disabilities but have not disclosed them and/or self-identified. Interviewees noted that, from the apprentice's perspective, there could be minimal benefit and a great deal of potential risk to disclosing a disability to their employer and/or self-identifying on the Voluntary Disclosure Form. Thus, apprentices might forego accommodations that could help them remain in and complete their programs. Interviewees discussed various strategies for encouraging self-identification (box 4).

BOX 4

Practices to Encourage Self-Identification

- Use specialized staff; for example, introduce an access team at orientation that is available to all apprentices; no medical diagnosis needed
- Share personal experiences when presenting the Voluntary Disclosure Form and discussing disclosure
- Train mentors on roles and responsibilities regarding disability and accommodations
- Train all staff on accessibility and internal accommodation processes

Source: Interviews with inclusive apprenticeship informants, 2023.

Employers can adopt practices that remove barriers to self-identification. Interviewees suggested different options for reimagining the self-identification process to educate apprentices about disabilities and potentially make it more comfortable for them to self-identify. One suggestion was to adopt a new approach for describing the Voluntary Disclosure Form. For example, before distributing the form, a staff person who supports an insurance apprenticeship program and is responsible for onboarding explained to the apprentices that there are a range of disabilities on the form, "that some are tangible, but others are not but still recognized as disabilities by law." She shared with the group that although she never thought about having a disability herself, she has one of the disabilities on the

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[4] "Miliary Apprenticeship," Wells Fargo, accessed September 12, 2024, https://www.wellsfargojobs.com/en/diversity/programs/military-apprenticeship/.

[5] Study team analysis of 2022 RAPIDS data, June 2023.

list. In that cohort, three of eight apprentices self-identified as having a disability, whereas in the past at most one had done so, and most commonly, none did.

Employers can create internal structures to proactively encourage self-identification. One IT intermediary separated the discussion about accommodations from the self-identification process by implementing an inclusivity access team. Team members introduce themselves at each apprenticeship program orientation and address apprentices' concerns about self-identification of a disability head on (e.g., fear of discrimination). The access team gives all apprentices information about who to contact and the process for requesting accommodations "to lower the barrier" for self-identification and disclosure. Furthermore, apprentices do not need a medical diagnosis to meet with the access team. Thus, apprentices who are having difficulty at work, potentially due to a non-disclosed or undiagnosed disability, can receive confidential support. According to the interviewee, "The access team is probably meeting with more than 25 percent of apprentices; 40 percent of the people who meet with the access team haven't previously disclosed a disability."

Additionally, employers can encourage self-identification and disclosure by creating a supportive work environment. An interviewee from an IT apprenticeship program noted the importance of training managers and mentors on their roles and responsibilities regarding disability and accommodations. One employer noted, "Often apprentices are comfortable reaching out directly to their mentor, who can help navigate the accommodations process." This employer also provides desk guides and "cheat sheets." An IT intermediary that operates an apprenticeship program noted that the access team provides resources for mentors and supervisors, including a manager orientation and an orientation for any staff that work with apprentices.

Employers can also provide multiple opportunities to disclose a disability. One sponsor, for example, administers continuous surveys that offer all apprentices the opportunity to identify a disability or request an accommodation throughout their time in the program. Another sponsor checks in quarterly with all apprentices to inquire what, if anything, is making the job more difficult, and uses the meetings as an opportunity to discuss accommodations. These practices align with the requirement that sponsors with five or more apprentices remind apprentices annually that they can update their disability status.[6]

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[6] 29 CFR § 1.50 (2016) "Part 30—Equal Employment Opportunity in Apprenticeship," Code of Federal Regulations, https://www.ecfr.gov/current/title-29/subtitle-A/part-30.

Enact Inclusive Workplace Practices for All Employees to Support Apprentices' Persistence and Completion

The practices described above aim to help apprentices obtain needed accommodations to stay in and complete their programs. Interviewees described various approaches to create an inclusive environment supportive of all apprentices (box 5).

BOX 5

Practices to Support Apprentices' Persistence and Completion

- Allow work schedule modifications and telework options
- Modify work equipment (e.g., adding closed caption options to equipment)
- Relocate staff to quiet spaces; provide noise cancelling headphones
- Provide timing/deadline modifications (e.g., build in breaks between calls)
- Establish and provide information on affinity groups
- Host quarterly check-ins with all apprentices; inquire about any factors that could affect performance as a way to broach the topic of accommodations

Source: Interviews with inclusive apprenticeship partners, 2023.

Employers can incorporate practices that facilitate integration of all employees into the workplace. Examples provided by respondents include allowing modified work schedules and telework options, providing quiet workspaces, providing noise cancelling headphones, building in frequent eating breaks, and permitting time between calls to "decompress" as needed. The employers interviewed experienced little to no costs associated with implementing these practices, which means they could be made universally available.

Employers can create a supportive environment by building communities among apprentices. One employer created "apprentice affinity groups," including one for neurodivergent apprentices. Each group has an executive sponsor, events, and speakers. Additionally, entities like inclusivity access teams, described above, can foster community among apprentices.

Discussion

Inclusive apprenticeship practices increase opportunities for apprentices with disabilities at all stages of the program lifecycle, from outreach and recruitment to program completion.

To start, apprenticeship sponsors can recruit directly from organizations that connect disabled people to employment. VR is one obvious choice, given its mission. However, identifying potential applicant pools is only the first step. Interviewees noted that it takes time and dedication to encourage collaboration between entities that have not traditionally worked together, and this includes gaining the trust of VR case managers. Leadership and front-line staff need training to deepen engagement between VR and employers. Equally important is effective messaging to employers that VR can help them meet their talent needs and that supports are available to help VR customers succeed in apprenticeships.

California adopted a promising approach to increase collaboration between VR and apprenticeship providers. The VR agency's director and the executive director of the State Council on Developmental Disabilities are ex officio members of an apprenticeship committee that advises the state apprenticeship director. Both also participate in a subcommittee to address apprenticeships for disabled people.

Interviewees also described ways employers can create environments that facilitate self-identification and disclosure of a disability. Employers should be clear about the purpose of the Voluntary Disclosure Form—that it is not punitive, but instead aims to help the employer understand the potential needs of apprentices as well as help DOL track progress in increasing disability inclusion in Registered Apprenticeship programs. Staff who distribute the Voluntary Disclosure Form can describe their own experience filling out similar forms. Employers can invite former and current apprentices to attend orientations where they describe why they self-identified as having a disability and the benefits of doing so.

Alternatively, employers can encourage self-identification by going beyond providing legally required accommodations and take a universal approach of employer-provided assistance. This means that any apprentice can request and receive assistance, regardless of whether they have been diagnosed with a medical condition or disability requiring an accommodation. For example, a universal design for learning approach would embed subtitles in all training videos rather than wait for an individual to request them. Finally, affinity groups can help apprentices feel more integrated and secure in the workplace; knowing other apprentices and workers share their experiences can increase their comfort with disclosure.

Future research is needed to systematically document the promising practices shared in this brief. This new research would add to the growing evidence base on strategies to help people with disabilities access and persist in apprenticeship programs.

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Acknowledgments

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