



# State-Level Policies Develop Skilled Workforces through Registered Apprenticeship Programs

**Lessons from the Office of Apprenticeship and Four State Apprenticeship Agencies**

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The National Apprenticeship Act (NAA), which has guided our national system of apprenticeship, has been collecting dust for nearly 90 years since its implementation in 1937. Still, over the past ten years, the Department of Labor and State Apprenticeship Agencies have overseen a significant expansion of Registered Apprenticeship Programs, growing them by 85 percent. Americans are increasingly eager to build apprenticeships in fields from plumbing to cybersecurity. In 2025, more apprentices will be employed than students at the nine largest US public universities.

Yet, state-by-state variations result in different policies for employers navigating the Registered Apprenticeship system. To expand apprenticeships and maintain quality, policymakers should ensure that current programs can continue to thrive and that new industries can adopt the apprenticeship model.

This brief offers findings from exploratory research to understand the policies of the national apprenticeship system. We focused on four policies: supervising apprentices, hiring, recordkeeping, and wages. We found that, while these systems were generally aligned on recordkeeping and wage progression, differences in Equal Employment Opportunity implementation and supervision of apprentices introduce challenges to national adoption. To strengthen national apprenticeship governance, we recommend policy alignment between the registration agencies, provision of clear guidance on supervising apprentices to include quality and safety, and setting wage benchmarks to ensure apprentices do not journey into occupations paying below the poverty line.

# Data Collection and Methodology

Urban interviewed leadership at the Office of Apprenticeship (OA) and the directors of four state apprenticeship agencies (SAA): Alabama, North Carolina, Maryland, and Montana. These states were selected through a convenience sample and represent a range of labor union representation, political affiliations, and apprenticeship council roles. The research was limited in scope and intended to inform and drive policy discussion and consideration for the Colorado State Apprenticeship Agency. The Colorado State Apprenticeship Agency was interested in four areas for potential policy intervention. We confined our research to these four policy areas:

- **Apprentices' supervision** and how states set and define ratios (the number of apprentices to journeyworkers providing mentorship and teaching).
- **Selection procedures and sponsor recordkeeping requirements**, though unrelated, are grouped for convenience under sponsor responsibilities. Selection covers advertising, interviewing, vetting, and hiring apprentices, while recordkeeping supports program compliance and agency monitoring.
- **Wage policies** and progressive wage scales for apprentices and programs.
- **Equal Employment Opportunity (EEO) monitoring**—how agencies ensure nondiscrimination among apprenticeship programs.

## Apprentice Supervision

Registration agencies require program sponsors to provide a numeric ratio of apprentices to journeyworkers, which is listed in their program standards. The standards indicate how many professionals (journeyworkers) will ensure adequate training, supervision, and safety.

OA updated its policy guidance circular, *Guidelines for Reviewing Apprentice to Journeyworker Ratios*,<sup>1</sup> in 2021, intending to guide the National Apprenticeship System to determine whether ratios are safe and provide quality instruction. In each registration agency, a typical ratio of one apprentice per journeyworker (1:1) is allowable in all cases and across industries. For federally operated OA states, sponsors may request a higher ratio (expanded ratio)—such as two or three apprentices per journeyworker—by providing a written justification to the agency, including:

- documentation of quality programming,
- type of occupation and whether there are occupational or industry hazards, and
- the sponsor's occupational safety record.

Some registration agencies factor in the sponsor's performance, such as the program's apprentice completion rate and safety record, to determine ratios. For example, OA may ask a sponsor for Occupational Safety and Health Administration Injury and Illness Records<sup>2</sup> to determine if the employer

has a track record for workplace safety to justify an expanded ratio. Maryland also assesses compliance with EEO requirements before approving expanded ratios.

Expanded ratios in the construction trades or other hazardous occupations are rare. Still, some programs in hazardous occupations have obtained expanded ratios when the apprentices reach a certain number of on-the-job training hours.<sup>3</sup> In Montana, the governor required the Montana Department of Labor to loosen ratio requirements—allowing two apprentices to be supervised by one journeyworker in any given trade or occupation.<sup>4</sup>

Some registration agencies monitor apprentice supervision through annual reviews and inspections. Alabama allows anonymous reporting of safety concerns and injuries, while Maryland interviews apprentices to determine safety risks and adequate supervision and may conduct on-site inspections. For federal construction projects (Davis–Bacon projects),<sup>5</sup> two states and OA do not differentiate monitoring between these apprenticeship programs and those generally considered hazardous occupations.

Apprentice age can also influence ratio policy. Alabama, North Carolina, and OA do not require specific ratios for workers under age 18. In contrast, Montana and Maryland require a 1:1 ratio for youth apprentices who are also minors.

## Selection Procedures and Sponsor Recordkeeping Requirements

Selection procedures and sponsor recordkeeping requirements are grouped as sponsor requirements for this report’s convenience. For practical and recording purposes, sponsors build a hiring plan for advertising, recruiting, interviewing, and considering potential apprentices. Additionally, sponsors have requirements for maintaining accurate apprentice and applicant records and the program’s labor standards.

### Selection Procedures

Registration agencies collect information about how employers advertise, interview, and hire apprentices, which is known as “selection procedures.” Sponsors can pick their preferred selection procedure: “first come, first served,” random pool of applicants, direct entry into apprenticeship (i.e., pre-apprenticeship, preference to veterans), and so on. They can choose any selection procedure if it is nondiscriminatory and “facially neutral,” meaning it applies equally to all candidates.<sup>6</sup>

The four agencies interviewed rely on their state and national apprenticeship regulations rather than issuing additional selection procedure guidance. Sponsors can typically defer to their typical hiring standards if selection procedures align with the requirements of the apprenticeship rule, as long as they do not discriminate against protected groups. OA offers guidance on selection procedures<sup>7</sup> but fewer resources than we found in 2024.

## Recordkeeping

All four state registration agencies require sponsors to keep records for five years from the date of the last apprentice action. None of the states preferred electronic vs. paper records, and they left it to the sponsor's discretion as long as sponsors can provide records on request. OA and Alabama require the voluntary disability disclosure forms<sup>8</sup> to be kept separately from other apprentice records to comply with federal privacy standards and apprenticeship regulations.

## Monitoring

Registration agencies ensure that RA programs use selection procedures and monitor the programs' recordkeeping practices during program reviews. The reviews, known as Apprenticeship Program Reviews (APR) and Extended Apprenticeship Program Reviews (EAPRs),<sup>9</sup> occur at different intervals in each registration agency. APRs review a program's overall performance, whereas EAPRs have additional requirements, including monitoring of EEO in apprenticeship. North Carolina and Alabama, like OA, provide a checklist for apprenticeship and training representatives during reviews, but we did not find checklists universally applied across all agencies.

## Wage Policies

Registered Apprenticeship Programs are jobs from day one, distinguishing them from other forms of work-based learning by ensuring apprentices receive wages for productive work and progress toward higher earnings.<sup>10</sup> The national apprenticeship system has two key wage requirements: apprentices must be paid at least the minimum wage, according to the state, and their wages must increase as they acquire new skills, a concept known as progressive wages. However, no national policy guidance clarifies how these wage requirements are implemented at the sponsor or state level.

## Wage Progression

Registration agencies require wage progression for apprentices to reward skill attainment and motivate them to complete the apprenticeship. All registration agencies require at least one pay increase during the apprenticeship; however, the registration agencies encouraged sponsors to set pay increases every six months and to have competitive wages in the program compared to the industry, occupation, and geography.

## Minimum Wages and Living Wages

All apprentices are paid at least the minimum wage set by the state or the federal minimum. However, increasing evidence shows that registered apprenticeship may be a good policy vehicle for delivering living wages to workers, not just a minimum wage as required by law (Bruno and Manzo 2025). Among those we interviewed, Alabama is the only registration agency with a living wage requirement: apprentices who have completed a year of training should receive a living wage, which can vary based

on the cost of living in the area. All other agencies require apprentices to start at the minimum wage or above but have no further guidance on living wages. Notably, Alabama and Montana exclude low-wage occupations from registered apprenticeships, especially if they result in poverty wages at the journey level.

## **Fringe Benefits and Exceptions**

All registration agencies calculate fringe benefits separately from wages and do not include them in progressive wage requirements. However, exceptions exist due to a lack of regulatory clarity, and it is challenging to understand whether fringe benefits are included in the progressive wage.

## **Wage Monitoring and Enforcement**

All registration agencies monitor wages during APRs. Alabama and Maryland conduct additional reviews to ensure apprentices receive fair compensation. For programs operated by labor unions and employers, OA and Montana follow the wage progression outlined in collective bargaining agreements, a standard practice across the national apprenticeship system. Most registration agencies monitor group and individual programs to provide flexibility to the sponsor—and employers in group programs can set their wage scale differently from the sponsor’s registration package. Typically, this is noted in the sponsor’s standards. However, there are exceptions.

In Alabama, officials raised concerns about potential wage collusion among employers in group programs. They advise each employer to create their own wage schedule to avoid setting a wage floor or ceiling.

# **Equal Employment Opportunity Monitoring**

The EEO in Apprenticeship regulations<sup>11</sup> helps ensure that apprenticeship sponsors recruit from a broad range of applicants, do not discriminate against apprentices based on race, sex, and/or disability, and that apprentices have avenues to file discrimination complaints. The regulations do not have hiring quotas. Instead, they require sponsors to widen their recruitment efforts when hiring apprentices. Ultimately, sponsors are in the driver’s seat regarding whom they hire.

The EEO in Apprenticeship upholds that it is unlawful for a Registered Apprenticeship Program sponsor to discriminate against an apprentice or applicant based on race, color, religion, national origin, sex, sexual orientation, age (40 or older), genetic information, or disability.

Urban asked four states and OA about these topics related to EEO and gathered information about the registration agencies’ EEO monitoring. We found that all states and OA provide direct resources and training assistance (TA) to support sponsors with diversifying outreach methods. Most states also have an established process for handling EEO complaints and focus on providing technical assistance to address EEO concerns.

## Universal Outreach

Universal outreach is an element of the Apprenticeship EEO rules to ensure access to apprenticeships and, for some employers, open their doors to new talent pools. All apprenticeship sponsors develop and update a list of recruitment sources annually to generate referrals within their recruitment area, identify contacts at each source, and provide these sources with advance notice of all apprenticeship openings.

Our interviews revealed that all SAAs require universal outreach but lack clarity about which sponsors it applies to. For practical purposes, OA notes that all sponsors have universal outreach requirements, regardless of how many apprentices are employed and participate in the program.<sup>12</sup>

Following the Labor Department's 2017 Rule on EEO in Apprenticeship,<sup>13</sup> OA launched a tool called the Universal Outreach Tool<sup>14</sup> to support sponsors and SAA states in contacting diverse organizations to improve representation of women, people of color, and people with disabilities.

However, in our interviews with the four SAA directors, Urban found that SAAs generally do not rely on the Universal Outreach Tool to support sponsor recruitment lists because it does not leverage state-level data. As a result, states often end up using their own outreach lists and organizations. The Universal Outreach Tool could have greater value for states and sponsors given future updates and coordination.

Instead, SAAs are meeting universal outreach through other methods. Montana has partnered with vocational rehabilitation, the Department of Corrections, veteran groups, and tribal organizations. Maryland facilitates connections with trade union associations and nonprofits to improve outreach for sponsors. Additionally, we found that Maryland is transitioning toward implementing the 2016 EEO in Apprenticeship rule but, in practice, supports sponsors with technical assistance in their efforts to diversify their recruiting areas and partner with other organizations.

## EEO Regulations and Incumbent Workers

Urban asked the registration agencies how sponsors with incumbent worker apprenticeships (internal to the company) comply with EEO regulations and universal outreach requirements. The agencies do not penalize incumbent worker programs but recognize that incumbent worker hiring pools can lead to disparate impacts on women, people of color, or people with disabilities since the incumbent recruiting pool may be less diverse than the recruiting area. The registration agencies encourage diverse recruiting and partnerships with sponsors. All registration agencies allow incumbent worker recruiting methods but encourage sponsors to adopt additional diverse recruiting strategies. Specifically, OA evaluates the recruiting pool for companies with such recruitment strategies to ensure equal access and opportunities for candidates more broadly.

## Anti-Harassment Training

We found varying practices in the states related to the provision of anti-harassment training. By regulation, sponsors must provide anti-harassment training to all individuals connected with the administration or operation of the apprenticeship program. Anti-harassment training must include active participation by trainees, and sponsors must maintain documentation of the anti-harassment training provided.

In 2024, Alabama and OA required sponsors to produce documentation of anti-harassment training, which is assessed during apprenticeship program reviews. Montana allows sponsors to provide verbal confirmation of having delivered the training. North Carolina integrated the anti-harassment training into the apprenticeship standards prepared jointly by sponsors and the agency. Maryland does not yet monitor this specific anti-harassment training but plans to offer guidance to sponsors to meet the requirements.

## EEO Complaints and Investigations

We found that the registration agencies were largely aligned in handling EEO complaints and investigations. The National Apprenticeship Act and its regulations provide additional workplace protections for apprentices. One of those rights for apprentices is to complain to a registration agency if they believe unlawful discrimination has adversely affected them. Registration agencies do not adjudicate illegal discrimination, but they are key players in ensuring that the proper authorities, such as the Equal Employment Opportunity Commission and similar human rights state-level agencies, investigate workplace discrimination complaints.

Urban found that among the registration agencies we interviewed, most investigated complaints of unlawful discrimination or passed them on to a state or federal agency. Meanwhile, OA conducted program reviews in response to EEO complaints and filed other discrimination complaints to the federal Equal Employment Opportunity Commission for further investigation if they are out of OA's purview or capability to support with a technical assistance support strategy. In general, the registration agencies expressed that EEO complaints can be addressed through technical assistance to improve outcomes and resolve issues at the local and employer level—rather than through other means of enforcement or referral to additional agencies investigating civil and worker rights violations.

## Comparing Apprenticeship Policies across Four States

The tables below compare state-level apprenticeship policies and practices across four states and the Office of Apprenticeship, highlighting similarities and differences. Our interviews of the four states and OA regarding apprentice supervision showed that all states set a default ratio of one-to-one (one apprentice per supervisor), but allow sponsors to request expanded ratios for certain occupations. Only two states factor age into ratio requirements (table 1). On selection procedures and sponsor recordkeeping requirements, most sponsors follow federal regulations and are required to keep all

apprentice records five years from the last date of action, though Alabama notably requests that disability documentation be kept separate from other records to maintain privacy (table 2). All sponsors require at least one wage progression during the program, and two states aim to exclude low-wage occupations from apprenticeship (table 3). Finally, for EEO, we found that all states support programs in adopting diverse recruiting practices and most states have an established process for handling EEO complaints (table 4).



TABLE 1

## Apprenticeship Supervision Policies by State

Commonalities	Alabama	Maryland	Montana	North Carolina	Office of Apprenticeship
<ul style="list-style-type: none"> <li>Default guidance is 1:1 ratio</li> <li>Sponsors must submit a request and justification for expanded ratios</li> <li>For Davis Bacon projects, does not differentiate monitoring between these programs and those generally considered hazardous occupations</li> </ul>	<ul style="list-style-type: none"> <li>Default guidance is 1:1 ratio</li> <li>Sponsors must submit a request for expanded ratio</li> <li>Licensed occupation ratios are requested through state licensure boards</li> <li>Provide avenues for anonymously reporting safety concerns and injuries</li> <li>Hazardous occupations are determined based on federal restrictions</li> <li>Leaves enforcement of Davis-Bacon to DOL</li> <li>Does not consider age in setting ratio guidance</li> </ul>	<ul style="list-style-type: none"> <li>Default guidance is 1:1 ratio</li> <li>Sponsors must submit justification for expanded ratio, and that ratio can be rescinded</li> <li>1:1 ratio required for youth apprentices</li> <li>Interviews apprentices to determine compliance with ratios</li> <li>Collects EMRs, employer records, OSHA documentation, and the sponsor's most recent compliance review</li> </ul>	<ul style="list-style-type: none"> <li>Ratios are established based on licensed trades but can be expanded with approval from the state for less hazardous occupations</li> <li>In 2022, a revised rule altered the apprentice-to-journeyworker ratio from 1:2 to 2:1</li> <li>Requires 1:1 ratio for youth apprentices</li> </ul>	<ul style="list-style-type: none"> <li>Default guidance is 1:1 ratio</li> <li>Sponsors must submit justification for expanded ratio</li> <li>Does not monitor ratios differently for Federal projects (Davis-Bacon projects)</li> <li>Does not factor age into ratio requirements</li> </ul>	<ul style="list-style-type: none"> <li>Ratio guidance is based on licensure in the local area, with more significant restrictions for hazardous occupations</li> <li>Sponsors must submit justification for expanded ratios</li> <li>Does not consider a distinction between Davis-Bacon and hazardous occupations in monitoring.</li> <li>Does not consider the apprentice's age in relation to ratios</li> <li>For requests of expanded ratios, OA receives OSHA 300s and other documentation</li> </ul>

Source: Findings from interviews with SAA directors and the Office of Apprenticeship.

TABLE 2

## Selection Procedures and Sponsor Recordkeeping Policies by State

Commonalities	Alabama	Maryland	Montana	North Carolina	Office of Apprenticeship
<ul style="list-style-type: none"> <li>Selection procedures largely follow federal regulations</li> <li>Selection and recordkeeping procedures are monitored as part of regular program reviews</li> <li>Sponsors required to keep apprentice records for five years from last date of action</li> </ul>	<ul style="list-style-type: none"> <li>Sponsors can use various selection procedures, and the state will help format a legally compliant standard</li> <li>Uses a selection procedure checklist to monitor compliance with selection and requires sponsors to keep all records for five years</li> <li>Disability disclosure forms must be kept separately from other apprentice records due to privacy laws</li> <li>Provides clear checklists for program reviews that outline which records are needed for APRs and has trained professionals who understand these records and the limitations around them</li> </ul>	<ul style="list-style-type: none"> <li>Guidance on selection procedures largely follows the federal regulations</li> <li>Conducts program review within six to 12 months of registration for all sponsors, then every other year to monitor compliance with selection and recordkeeping procedures</li> <li>Requires sponsors to keep records for five years after the last action (interview, start, cancellation, completion)</li> </ul>	<ul style="list-style-type: none"> <li>Selection procedures follow federal regulations</li> <li>Conducts inspections (apprenticeship program and EEO reviews) once annually, applying self-attestation to satisfy 29/30 and relying on a policy and form developed for APRs and EAPRs</li> <li>Requires any apprenticeship records to be kept for five years</li> </ul>	<ul style="list-style-type: none"> <li>Guidance on selection procedures largely follows the federal regulations</li> <li>Compliance with selection procedures is monitored as part of the state's apprenticeship program reviews (compliance reviews), conducted every five years</li> </ul>	<ul style="list-style-type: none"> <li>Sponsors may utilize one or more selection procedure(s) so long as they are uniformly and consistently applied to all applicants, comply with the Uniform Guidelines on Employee Selection Procedures (UGESP) and Americans with Disabilities Act, and are facially neutral with respect to Part 30's protected bases (race, color, religion, national origin, sex, sexual orientation, age (40 or older), genetic information, or disability (see Circular 2023-01))</li> <li>OA defers to 29 CFR Part 29 for recordkeeping standards, requiring records to be kept five years from the last date of action</li> </ul>

Source: Findings from interviews with SAA directors and the Office of Apprenticeship.

TABLE 3

## Apprentice Wage Policies by State

Commonalities	Alabama	Maryland	Montana	North Carolina	Office of Apprenticeship
<ul style="list-style-type: none"> <li>Require at least one wage increase during the program</li> <li>Fringe benefits are not factored into the wage scale</li> </ul>	<ul style="list-style-type: none"> <li>Requires a progressive wage</li> <li>Required living wage policy (apprentices must be paid the average living wage for a single adult with no children after one year of apprenticing)</li> <li>Calculates fringe benefits separately from wages</li> <li>Uses a five-star rubric to determine in-demand occupations for apprenticeship, considering factors such as the occupation's median wage and projected annual growth</li> <li>Requests apprentice pay stub samples during compliance visits</li> </ul>	<ul style="list-style-type: none"> <li>Requires a wage progression during the program</li> <li>Does not exclude low-wage occupations from apprenticeship</li> <li>Develops a new wage sheet biannually for wage monitoring</li> <li>Does not factor fringe benefits into progressive wage</li> </ul>	<ul style="list-style-type: none"> <li>Requires a starting, intermediate, and end wage for wage progression during an apprenticeship program</li> <li>Avoids low-wage occupations for apprenticeship</li> <li>Does not factor fringe benefits into progressive wage</li> <li>Wage scales are determined by the JATCs for group joint programs and employers for group non-joint programs</li> </ul>	<ul style="list-style-type: none"> <li>Requires at least one midpoint wage increase during the program</li> <li>Does not factor fringe benefits into wage scale</li> <li>Allows for varying progressive wages in group, non-joint sponsorship</li> </ul>	<ul style="list-style-type: none"> <li>Requires a wage progression during program</li> <li>No policy circular or guidance developed on wage scales</li> <li>Does not exclude low-wage occupations from apprenticeship</li> <li>Allows wage variation for statewide union programs</li> </ul>

Source: Findings from interviews with SAA directors and the Office of Apprenticeship.

TABLE 4

## Equal Employment Opportunity Monitoring Policies by State

Commonalities	Alabama	Maryland	Montana	North Carolina	Office of Apprenticeship
<ul style="list-style-type: none"> <li>■ Universal outreach required for 5+ apprentices</li> <li>■ Incumbent workers are an allowable recruitment method</li> <li>■ Provide direct resources and TA to support sponsors with diversifying outreach</li> <li>■ Established process for receiving EEO complaints, which can be passed on to other agencies if the state director does not have the means to investigate</li> <li>■ Deregistration of programs is a last resort, with most states providing TA to address EEO complaints</li> </ul>	<ul style="list-style-type: none"> <li>■ Requests sponsors' recruitment strategy as part of their affirmative action plan and will ask for specific recruiting practices if hiring gaps exist</li> <li>■ Universal outreach requirement is effective two years after registration of the 5th apprentice</li> <li>■ Doesn't require sponsors to use universal outreach if hiring apprentices who are incumbent workers if they're technically following the rules</li> <li>■ Encourages sponsors to develop organization-specific anti-harassment training and requires documentation of interactive training and materials during APRs and EAPRs</li> <li>■ General mailbox is set up for EEO</li> </ul>	<ul style="list-style-type: none"> <li>■ For universal outreach, follows 29 CFR 30 and requires sponsors with 5+ apprentices to comply</li> <li>■ If sponsors' apprentice cohorts are not meeting the diversity of their recruiting area, state provides technical assistance working with organizations that will diversify recruitment</li> <li>■ Incumbent workers can lead to underrepresentation in recruiting, but there is an allowable method for recruiting apprentices</li> <li>■ Creates lists of partners, including American Job Centers, trade associations, and nonprofits, and facilitates warm connections for</li> </ul>	<ul style="list-style-type: none"> <li>■ Has a list of one-stop centers to disseminate to employers to support sponsors' universal outreach</li> <li>■ Works closely with vocational rehabilitation, the Corrections Department, and veterans and tribal organizations</li> <li>■ Incumbent worker recruitment strategies are allowable, but employers should cast a wide net when hiring so that recruiting processes do not occur in a vacuum</li> <li>■ Relies on an honor system for anti-harassment training and assesses completion during program reviews</li> <li>■ For EEO complaints, apprentice complainants submit complaints online for</li> </ul>	<ul style="list-style-type: none"> <li>■ Universal outreach in the state is required for programs with five or more apprentices</li> <li>■ NC has a tool that collects demographic information by region for sponsors</li> <li>■ Programs with only incumbent worker recruitment and hiring strategies are allowable</li> <li>■ Anti-harassment is built into the standards, and NC refers sponsors to OA on documents for training guidance</li> </ul>	<ul style="list-style-type: none"> <li>■ Universal outreach required for all programs</li> <li>■ For multiple-employer sponsors, diversity assessed within the geographic region</li> <li>■ For companies with incumbent worker recruitment, determines if recruitment approach should be modified and provides technical assistance</li> <li>■ Directs sponsors to Universal Outreach Tool on Apprenticeship.gov.</li> <li>■ ATRs review anti-harassment training documentation during provisional reviews and every five years during EAPRs</li> <li>■ Offers anti-harassment training and provides a video and tools online that support compliance</li> <li>■ Receives EEO complaints by phone,</li> </ul>

Commonalities	Alabama	Maryland	Montana	North Carolina	Office of Apprenticeship
	<p>complaints, which go to the state director</p> <ul style="list-style-type: none"> <li>In the event of discrimination, the state provides avenues for complaints and maintains a close partnership with the federal office who can investigate and penalize offenders</li> <li>If unlawful discrimination is found, can deregister the program</li> </ul>	<p>sponsors to assist with UO</p> <ul style="list-style-type: none"> <li>Pulls anti-harassment handouts and EEO training from DOL to distribute</li> <li>Limit of one year to file an EEO complaint; if the sponsor does not handle it, complaints go to the state director for investigation.</li> <li>The apprentice can also pass the complaint to a local EEO agency</li> <li>Cancellation of programs is an option, but TA can also be provided to address program performance</li> </ul>	<p>the state to investigate. Since ATRs have relationships with sponsors, they will visit employers regarding complaints</p> <ul style="list-style-type: none"> <li>Does not have enforcement authority for harassment complaints, so they're passed on to the state Human Rights Bureau if it involves discrimination</li> <li>Programs with an EEO complaint may be put on probation and experience more frequent inspections, with deregistration as a last resort.</li> </ul>		<p>email, or text. The Department's Solicitor's office reviews complaints and offers advice on handling the complaint to the OA. OA may then investigate, provide technical assistance to the sponsor, and then forward them to the EEOC and other agencies as appropriate</p> <ul style="list-style-type: none"> <li>Complaints trigger a program review, and OA works with the apprentice complainant to ensure they have raised concerns with the sponsor</li> <li>Deregistration is a last resort option, and OA doesn't discount the value of improving compliance with direct technical assistance</li> </ul>

**Source:** Findings from interviews with SAA directors and the Office of Apprenticeship.

# Policy Recommendations for State Apprenticeship Agencies

The National Apprenticeship Act of 1937 provides little detail on how a bifurcated system of SAAs and federally operated states should organize a national apprenticeship system that supports high-quality apprenticeships for workers and businesses. Moreover, an update on the 2009 29 CFR Part 29 (Labor Standards for Apprenticeships) regulation is sorely overdue to support a more robust and high-quality experience in Registered Apprenticeship.

From our research we found that it is incumbent upon USDOL and states to create clear and consistent experiences for sponsors through policymaking and practice. We identified the following policy strategies and practices that would enhance transparency and consistency in the apprenticeship system for workers and employers alike:

- **Apprentice supervision:** States and OA should provide clear guidance online and forms for requesting expanded ratios of apprentice supervision. For states considering expanded ratios, flexibility in ratios can be provided to low-hazard occupations. Records on worker safety can support the sponsor's justification for expanded ratios, and data provided by the Bureau of Labor Statistics on workplace injuries, hazardous occupations, and apprentice completion rates. For monitoring supervision, states could implement compliance measures, including anonymous reporting and apprentice interviews, to determine whether sponsors are implementing safe and quality supervision.
- **Selection and recordkeeping:** Recordkeeping requirements and checklists for sponsors should be clear, transparent, and easily accessible online for sponsors and employers. Although the registration agencies have guidelines for recordkeeping, specific and transparent requirements for maintaining apprentice records could improve clarity for employers.
- **Wages:** Since the National Apprenticeship Act of 1937, national regulations and policy regarding wage progression for apprentices becoming journeyworkers have not been clear for sponsors or states. Therefore, registration agencies should provide clear information on progressive wage requirements, especially for multiyear apprenticeship programs. Registration agencies could also clarify through guidance documents whether fringe benefits can be used as pay increases to support employer flexibility in meeting progressive wage requirements
- **Living wages:** To ensure skill progression is rewarded, agencies could require that apprentices in multiyear apprenticeship programs receive at least one yearly wage increase. Finally, states may consider setting wage benchmarks or creating information for sponsors to ensure sponsors and employers do not train workers in occupations that result in wages below the poverty line. Given limited financial and human resources, states should focus on supporting employers' programs that provide family-supporting wages.
- **EEO monitoring:** States and OA should ensure clear communication to sponsors and training for staff and intermediaries on all Equal Employment Opportunity (EEO) aspects through

written materials and online resources. We noted that many resources for states and sponsors on anti-harassment and EEO were removed from Apprenticeship.gov starting in February 2025.<sup>15</sup> It is unclear if this information removal is a permanent change.

- **Universal outreach:** States should leverage online tools, like the Universal Outreach Tool, to build partnerships with organizations serving underserved populations. Further collaboration with US DOL and registration agencies is required to improve the database of state organizations that can recruit talent for open apprenticeships.
- **Anti-harassment training:** States and OA should provide online compliance resources such as instructional videos and assessments to ease the ability of sponsors to deliver the training to apprentices, trainers, and coworkers.
- **EEO complaint handling:** States must establish clear reporting protocols in collaboration with their state agency or the US Equal Employment Opportunity Commission. Some states where the state apprenticeship agency cannot manage discrimination complaints have specific memoranda of understanding (MOUs) with human or civil rights agencies to handle such complaints.

## Notes

<sup>1</sup> See the February 2021 circular “Guidelines for Reviewing Apprentice to Journeyworker Ratio Requests” and other DOL ETA circulars at <https://www.apprenticeship.gov/about-us/legislation-regulations-guidance/circulars>.

<sup>2</sup> US Department of Labor Occupational Safety and Health Administration, “Injury & Illness Recordkeeping Forms - 300, 300A, 301,” accessed February 25, 2025, <https://www.osha.gov/recordkeeping/forms>.

<sup>3</sup> Independent Electrical Contractors Central Texas Chapter, “Standards of Apprenticeship (Overview),” accessed February 4, 2025, <https://centexiec.com/wp-content/uploads/2020/06/Doc-3.-Standards-of-Apprenticeship-Overview.pdf>.

<sup>4</sup> Governor’s Office, “Governor Gianforte Highlights State’s Record Apprenticeship Growth,” State of Montana Newsroom, November 15, 2023, [https://news.mt.gov/Governors-Office/Governor\\_Gianforte\\_Highlights\\_States\\_Record\\_Apprenticeship\\_Growth](https://news.mt.gov/Governors-Office/Governor_Gianforte_Highlights_States_Record_Apprenticeship_Growth).

<sup>5</sup> US Department of Labor, Wage and Hour Division, “Davis–Bacon and Related Acts,” accessed February 25, 2025, <https://www.dol.gov/agencies/whd/government-contracts/construction>.

<sup>6</sup> US Department of Labor, Office of Apprenticeship, “Selecting Apprentices for Registered Apprenticeship Programs,” accessed on February 4, 2025, [www.apprenticeship.gov/sites/default/files/sponsor-quick-reference-guide-selection.pdf](https://www.apprenticeship.gov/sites/default/files/sponsor-quick-reference-guide-selection.pdf).

<sup>7</sup> US Department of Labor, Office of Apprenticeship, “Selecting Apprentices for Registered Apprenticeship Programs.”

<sup>8</sup> US Department of Labor, Employment and Training Administration, “Voluntary Disability Disclosure,” accessed February 25, 2025, <https://www.apprenticeship.gov/sites/default/files/Voluntary%20Disability%20Disclosure%20Expires%207-31-2027.pdf>.

- <sup>9</sup> US Department of Labor, Office of Apprenticeship, “Apprenticeship Program Reviews: Quick References Guide for Registered Apprenticeship Program Sponsors,” accessed February 26, 2025, <https://www.apprenticeship.gov/sites/default/files/apprenticeship-program-reviews-quick-reference-guide.pdf>
- <sup>10</sup> Karen Gardiner, “Registered Apprenticeships Can Increase Earnings, but Not Enough People Know That,” Urban Wire (blog), Urban Institute, November 15, 2023, <https://www.urban.org/urban-wire/registered-apprenticeships-can-increase-earnings-not-enough-people-know>.
- <sup>11</sup> “Part 30—Equal Employment Opportunity in Apprenticeship,” a Rule by the Labor Department and the Employment and Training Administration, 81 C.F.R. 92108 (2017), <https://www.ecfr.gov/current/title-29/part-30>.
- <sup>12</sup> US Department of Labor, Office of Apprenticeship, “Universal Outreach Tool,” accessed February 4, 2025, [www.apprenticeship.gov/employers/explore-apprenticeship/recruit-and-hire/universal-outreach-tool](http://www.apprenticeship.gov/employers/explore-apprenticeship/recruit-and-hire/universal-outreach-tool).
- <sup>13</sup> “Part 30—Equal Employment Opportunity in Apprenticeship,” a Rule by the Labor Department and the Employment and Training Administration, 81 C.F.R. 92108 (2017).
- <sup>14</sup> US Department of Labor, Office of Apprenticeship, “Universal Outreach Tool.”
- <sup>15</sup> US Department of Labor, Office of Apprenticeship, “Equal Employment Opportunity,” [www.apprenticeship.gov/eo](http://www.apprenticeship.gov/eo), accessed February 27, 2025.

## References

- Bruno, Robert, and Frank Manzo. 2025. *Living Wages in Registered Apprenticeship Programs: An Assessment by Industry, Demographics, State, and Labor Policy*. Washington, DC: US Department of Labor Chief Evaluation Office; Bethesda, MD: Manhattan Strategy Group.
- Kuehn, Daniel, Siobhan Mills De La Rosa, Robert Lerman, and Kevin Hollenbeck. 2022. *Do Employers Earn Positive Returns to Investments in Apprenticeship? Evidence from Registered Programs under the American Apprenticeship Initiative*. Washington, DC: US Department of Labor.



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