



**Assessment as to whether the state should establish an institution, or centralized program, for apprentices to receive related supplemental instruction for credit toward a degree**

*2023 Annual Report to the Legislature*

December 1, 2023

# Table of Contents

<b>Executive Summary</b>	<b>1</b>
Data Gathering and Stakeholder Outreach	1
<b>Overview of Registered Apprenticeship</b>	<b>1</b>
What is Registered Apprenticeship?	2
What is Related Supplemental Instruction?	3
Labor & Industries — Registered Apprenticeship Related Supplemental Instruction	3
State Board for Community and Technical Colleges — Registered Apprenticeship Related Supplemental Instruction	4
Washington State Apprenticeship and Training Council — Registered Apprenticeship Related Supplemental Instruction	4
<b>Current State of Related Supplemental Instruction to Educational Credit</b>	<b>5</b>
WTB and ERDC - Data and Research	5
<b>Exploring an Institution and Centralized Program</b>	<b>6</b>
Existing Institution	7
Apprenticeship Institution — New	7
Centralized Program — Clearinghouse	8
<b>Conclusion</b>	<b>9</b>

## **Executive Summary**

The Legislature in 2022 approved SB 5764 — including subsection 3 of E2SSB 5764 — that tasked the Washington State Apprenticeship & Training Council (WSATC) with submitting a report on whether the state should establish an institution, or centralized program, for apprentices to receive related supplemental instruction (RSI) ([defined on pg. 3](#)) for credit toward a degree. This report will be included in the December 1, 2023, Washington Student Achievement Council's (WSAC) annual report.<sup>1</sup>

### **Data Gathering and Stakeholder Outreach**

Data gathering and stakeholder outreach was the WSATC's first priority in exploring whether the state should establish an institution, or centralized program, for apprentices to receive RSI for credit toward a degree. Meetings were conducted with the WSAC, the Council of Presidents (COP), the Workforce Education and Training Board (WTB), Washington State Education Research and Data Center (ERDC), and the State Board for Community and Technical Colleges (SBCTC).

Data inquiries were made to WTB and ERDC to collect more information about the apprentices who entered higher education after completing their apprenticeship. The goal was to determine and assess how many apprentices had completed their apprenticeships and gone into higher education. Additionally, the data obtained showed information not only on how many apprentices completed their apprenticeship and then went on higher education, but also what degree programs they enrolled in and whether they completed those degree programs. The data also included apprentice applicants who had higher-education degrees before entering their apprenticeships.

This report summarizes the WSATC's efforts to consult with the State Board for Community and Technical Colleges, the WSAC, an organization representing the presidents of the public four-year institutions of higher education, and any other relevant or affected parties as needed. Based on discussions with community partners and stakeholders, three possible structures emerged: (1) continue to operate under the current RSI credit system; (2) create a new Apprenticeship Institution; or (3) create a centralized system (clearinghouse) to support collaboration across the apprenticeship and higher-education systems. Based on the information gathered from these discussions and the data, the WSATC recommends further study, as the findings were inconclusive.

## **Overview of Registered Apprenticeship**

The WSATC is the governing body of Registered Apprenticeship in Washington State. It is composed of three voting members from employer organizations, three voting members from employee organizations, and a public member all appointed by the Director of the Washington State Department

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<sup>1</sup> E2SSB 5764.SL

of Labor & Industries (L&I).<sup>2</sup> One representative each of employers and employees are originally appointed for one year, two years, and three years, respectively.<sup>3</sup> Thereafter, each member shall be appointed to a term of three years.<sup>4</sup> The WSATC public member is appointed to a three-year term.<sup>5</sup>

The WSATC “is authorized to approve apprenticeship programs, and establish apprenticeship program standards as rules, including requirements for apprentice-related and supplemental instruction, coordination of instruction with job experiences, and instructor qualifications.”<sup>6</sup>

L&I acts as the WSATC’s administrative arm and is responsible for Registered Apprenticeship program compliance, program consultation and development, technical assistance to programs, apprenticeship preparation program development, and grant management.

### **What is Registered Apprenticeship?**

Registered Apprenticeship programs enable individuals to learn skilled trades and occupations through on-the-job training (OJT) and related supplemental instruction (RSI). Journey-level workers generally supervise OJT. Open shop, union-sponsored schools, or community and technical colleges (CTC) generally offer the technical instruction referred to in Washington State as RSI. Registered Apprenticeships must train for an apprenticeable occupation. An apprenticeable occupation must include the following.

- a) Involve skills customarily learned in a practical way through a structured, systematic program of on-the-job supervised learning;
- b) Be clearly identified and commonly recognized throughout an industry;
- c) Involve the progressive attainment of manual, mechanical, or technical skills and knowledge which, in accordance with the industry standard for the occupation, would require the completion of at least 2,000 hours of on-the-job learning to attain;
- d) Require a minimum of 144 hours of related instruction per program year to supplement on-the-job work experience;
- e) Involve sufficient skill to establish career sustaining employment;
- f) Not be part of an occupation previously recognized by the registering agency as apprenticeable.<sup>7</sup>

Most registered apprenticeship programs take two to five years to complete, and apprentices earn wages while learning their skilled trades or occupations. In Washington, there are about 22,000 active apprentices each year, a number that has nearly doubled over the past decade. The top-five construction trade apprenticeships are construction electrician, carpenter, laborer, plumber, and ironworker. The top-five non-construction trade apprenticeships are medical assistant, firefighter, tree trimmer, machinist (aircraft-oriented), and cosmetologist.

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<sup>2</sup> Wash. Admin. Code § 296.05.005

<sup>3</sup> Wash. Admin. Code § 296.05.005

<sup>4</sup> Wash. Admin. Code § 296.05.005

<sup>5</sup> RCW § 49.04.010(1)

<sup>6</sup> RCW § 49.04.010(2)

<sup>7</sup> Wash. Admin. Code § 296.05.003 (3)

## What is Related Supplemental Instruction?

Related Supplemental Instruction (RSI) is one part of the overall registered apprenticeship program standards. Standards are “a written agreement containing specific provisions for operation and administration of the apprenticeship program and all terms and conditions for the qualifications, recruitment, selection, employment, and training of apprentices.”<sup>8</sup> Apprenticeship program standards govern apprenticeship agreements between a program sponsor and an individual apprentice and define the term of the apprenticeship.<sup>9</sup> The WSATC approves all registered apprenticeship program standards.

WAC 296.05.003(3), quoted above, requires “a minimum of 144 hours of related instruction per program year to supplement on-the-job work experience.”<sup>10</sup> RSI is “an organized and systematic form of instruction designed to provide the apprentice with knowledge of the theoretical and technical subjects related to the apprentice's occupation.”<sup>11</sup> It may be provided in any form approved in advance by the WSATC.”<sup>12</sup> RSI “shall be defined in the standards per:

- (a) Twelve-month period from date of registration; or
- (b) Defined 12-month school year; or
- (c) Two thousand hours of on-the-job training.”<sup>13</sup>

Additionally, RSI must be taught by a competent instructor, defined as “an instructor providing related/supplemental instruction who has demonstrated satisfactory performance in the occupation for a minimum of three years beyond the customary learning period for that occupation and who:

- (a) Meets the requirements of the state board for community and technical colleges for a vocational-technical instructor; or
- (b) Is recognized within an industry as having expertise in a specific occupation and is a subject matter expert; and
- (c) Has training in teaching techniques and adult learning styles. The training may be acquired before, or within one year after, the competent instructor begins to provide related/supplemental instruction.”<sup>14</sup>

## Labor & Industries — Registered Apprenticeship Related Supplemental Instruction

As the administrative arm of the WSATC, L&I administers registered apprenticeships for state and federal purposes.<sup>15</sup> L&I is the first entity to receive a potential RSI plan. It is the role of the department, in conjunction with the SBCTC, to make sure the RSI is in compliance with industrywide standards and to verify the RSI instructor is competent under WAC 296.05.003(14).

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<sup>8</sup> Wash. Admin. Code § 296-05-003 (37)

<sup>9</sup> Wash. Admin. Code § 296.05.015

<sup>10</sup> Wash. Admin. Code § 296.05.003(3)

<sup>11</sup> Wash. Admin. Code § 296.05.003

<sup>12</sup> Wash. Admin. Code § 296.05.003(34)

<sup>13</sup> Wash. Admin. Code § 296.05.015(6)

<sup>14</sup> Wash. Admin. Code § 296.05.003(14)

<sup>15</sup> Wash. Admin. Code § 296.05.001(b)

Registered apprenticeship programs are required to provide L&I with their RSI (new or revised plan) during the application process, which is then reviewed by the SBCTC’s RSI Review Committee. L&I maintains RSI records for all registered apprenticeship programs. RSI plans must be updated every five years to ensure all registered apprenticeship programs are providing instruction that is the progressive attainment of manual, mechanical, or technical skills and knowledge, in accordance with the occupation’s industry-wide standards. Industry-wide standards are “the current, acceptable practices, including technological advancements, being used in the different occupations.”<sup>16</sup> RSI data is tracked through the Apprenticeship Registration and Tracking System (ARTS).

### **State Board for Community and Technical Colleges — Registered Apprenticeship Related Supplemental Instruction**

SBCTC is led by a nine-member, governor-appointed board responsible for administering the Community and Technical Colleges Act and providing leadership and coordination to Washington State’s system of public Community and Technical Colleges (CTC).<sup>17</sup> Washington’s CTC system is composed of 34 community and technical colleges that collectively serve about 273,000 people of all ages and backgrounds across the state.<sup>18</sup> SBCTC has three mission areas: basic education for adults; workforce education; and academic transfer,

SBCTC is responsible for providing the WSATC with recommendations “on matters of apprentice-related and supplemental instruction, coordination of instruction with job experiences, and instructor qualifications” (RCW 28B.50.880). Recommendations to the WSATC are provided by SBCTC after the RSI Review Committee has reviewed the RSI plans. The RSI Review Committee, comprised of a SBCTC representative, L&I Apprenticeship Manager, and WA State Apprenticeship Coordinator Association Chair, provides an opportunity for subject matter experts to weigh in on submitted plans and ask questions of the program sponsors. Committee feedback can be incorporated into SBCTC’s recommendation to the WSATC.<sup>19</sup>

### **Washington State Apprenticeship and Training Council — Registered Apprenticeship Related Supplemental Instruction**

As discussed previously, as part of the overall approval of the registered apprenticeship program standards, the WSATC “may approve apprentice related/supplemental instruction for apprenticeable occupations based on recommendations from the state board of community and technical colleges. Program sponsors may allow credit for previously completed related/supplemental instruction under WAC 296-05-015(11).”<sup>20</sup> When approving RSI plans, the WSATC considers the following:

- Industrywide standards;
- L&I’s proposed standards of apprenticeship ; and

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<sup>16</sup> Wash. Admin. Code § 296.05.003(23)

<sup>17</sup> [About the Washington State Board for Community & Technical Colleges | SBCTC](#)

<sup>18</sup> Program Brief. SBCTC, October 5, 2023

<sup>19</sup> Program Brief. SBCTC, October 5, 2023

<sup>20</sup> Wash. Admin. Code § 296-05-011

- SBCTC’s recommendation.

## **Current State of Related Supplemental Instruction to Educational Credit**

In the 2022-23 academic year, Washington’s CTCs served 12,530 apprentices across 18 colleges. The CTC’s partner with labor organizations and businesses to train Washingtonians in the skilled trades, including meat cutting, firefighting, carpentry, roofing, plumbing, aircraft mechanics, machining, and electrical work. A three-year average shows the CTC system generated 3,800 full-time-equivalent students (FTES). This translates to a significant investment that the college system maintains and grows.<sup>21</sup> The CTC system also provides wrap around supports for apprentices, such as food pantries, financial assistance, etc.

For those Registered Apprenticeship training programs that partner with a CTC, RSI coursework and the required on-the job training are validated for college credit. With the 18 CTCs spread throughout Washington State, the current geographic diversity allows for multiple institutions to provide apprentices with the opportunity to access degree pathways closer to their home locations. For example, through registered apprenticeship program and CTC partnerships, select apprenticeship completers have the opportunity to earn an Associate of Applied Science Transfer (AAS-T) degree in Multi-Occupational Trades (MOT), which also provides pathways to four-year degree programs. The MOT degree is currently available through South Seattle College, Spokane Community College, Renton Technical College, Skagit Valley College, Everett Community College, Wenatchee Valley College, and Columbia Basin College. MOT degree requirements include:

- completing a registered apprenticeship program of at least 6,000 hours;
- completing at least 450 hours of related supplemental instruction; and
- completion or verification of the required general education coursework (typically, four to six courses each meeting English composition, IT, management, public speaking, math, and sociology or general psychology requirements).<sup>22</sup>

### **WTB and ERDC - Data and Research**

Workforce Training and Education Coordinating Board (WTB) data shows that in the years 2015-2021, about 3% of apprenticeship completers entered into higher education during the second quarter after completing their apprenticeships.<sup>23</sup> During those same years, WTB data shows that between 75% and

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<sup>21</sup> Correspondence to the Department of Labor & Industries. SBCTC, October 5, 2023

<sup>22</sup> Program Brief. SBCTC, October 5, 2023.

<sup>23</sup> Correspondence to the Department of Labor & Industries. WTB Data, August 9, 2023

84% of all apprenticeship completers were employed during the second quarter after the end of their apprenticeships.<sup>24</sup>

According to data from the Education Research and Data Center (ERDC), which is derived from apprenticeship data from L&I and post-secondary data from SBCTC and the Public Centralized Higher Education System (PCHEES), 15.32% of apprenticeship completers enrolled in post-secondary education after completing their apprenticeships.<sup>25</sup>

## **Exploring an Institution and Centralized Program**

This section explores the feasibility of creating an institution or centralized program for apprentices to receive RSI for credit toward a degree. According to E2SSB 5764 section 1(4), institution means:

- (a) Any public university, college, community college, or technical college operated by the state of Washington or any political subdivision thereof; or
- (b) Any other university, college, school, or institute in the state of Washington offering instruction beyond the high school level that is a member institution of an accrediting association recognized by rule of the council for the purposes of this section and that agrees to and complies with program rules adopted pursuant to RCW 328B.92.150. However, any institution, branch, extension or facility operating within the state of Washington that is affiliated with an institution operating in another state must be:
  - (i) A separately accredited member institution of any such accrediting association;
  - (ii) A branch of a member institution of an accrediting association recognized by rule of the council for purposes of this section, that is eligible for federal student financial aid assistance and has operated as a nonprofit college or university delivering on-site classroom instruction for a minimum of twenty consecutive years within the state of Washington, and has an annual enrollment of at least seven hundred full-time equivalent students;
  - (iii) A nonprofit institution recognized by the state of Washington as provided in RCW 28B.77.240; or
  - (iv) An approved apprenticeship program under chapter 49.04 RCW.<sup>26</sup>

Based on discussions with SBCTC, WTB, WSAC, COP, and ERDC, there are several career pathways.

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<sup>24</sup> Correspondence to the Department of Labor & Industries. WTB Data, August 9, 2023

<sup>25</sup> Correspondence to the Department of Labor & Industries. ERDC Data, August 23, 2023

<sup>26</sup> E2SSB 5764.SL

## **Existing Institution**

For registered apprenticeship training programs that are affiliated with a CTC and whose apprentices that receive credit, one option is to keep operating under the existing system. Eighteen of the 34 CTCs in Washington State have some form of relationship with registered apprenticeship.<sup>27</sup>

This current system, even though it is an “institution” by definition, is decentralized. The colleges have the discretion to award RSI credits toward a degree on a college by college basis, creating potential for varied treatment of apprentices with the same RSI credentials. However, it also provides more geographic and diverse opportunities than a more centralized institution may provide. Registered apprenticeship is based highly off industry need, and that can vary depending on location. With multiple locations available for individuals with prior RSI credit to attend, more flexibility is afforded for a pathway that aligns with their overall needs and goals.

Another benefit of working within the existing structure is that all 34 CTC in Washington are accredited by the Northwest Commission on Colleges and Universities (NWCCU) and have immense knowledge and experience with the federal government rulemaking framework for transferring credit. The CTCs and baccalaureate institutions already bring their expertise together to collaborate in creating multiple degree pathways for RSI credit. When asked about this current model of the RSI credit system, the COP said: “The current structure allows for institution-led degree pathways and research opportunities benefiting both sectors. It recognizes the robust and diverse opportunities across the public baccalaureate sector while also providing for the potential to collaborate towards a shared understanding of credential transparency across a range of stakeholders.”<sup>28</sup> The creation of a new Apprenticeship Institution may forgo some of these benefits, outlined in further detail below.

## **Apprenticeship Institution — New**

The second option would be to create a new Apprentice Institution for apprentices to receive RSI for credit toward a degree. This approach would be difficult from a funding and maintenance standpoint. Creating a new Apprenticeship Institution would take significant resources and coordination among all stakeholders, as well as compliance with higher-education accreditation and federal government rules and industry regulations. In order to be an “institution” as established under E2SSB, the new institution would need to be a member of an accrediting association recognized by WSAC rule. Ensuring compliance with not only accreditation and federal government, but also adhering to academic standards when working with RSI, would be complex.

Additionally, creating an Apprenticeship Institution would decrease geographic diversity, potentially decreasing the accessibility of degree credit opportunities. However, it would provide more resources dedicated to apprentices based on their unique situations. An Apprenticeship Institution could offer services to clarify RSI credit toward a degree and transferability.

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<sup>27</sup> Correspondence to the Department of Labor & Industries. SBCTC, October 5, 2023

<sup>28</sup> Correspondence to the Department of Labor & Industries. COP, August 21, 2023

Overall, the biggest hurdle in creating an Apprenticeship Institution would be funding and resources. However, the largest benefit would be the formation of a one-stop institution dedicated toward apprentices' unique needs and a centralized system for granting degrees.

### **Centralized Program — Clearinghouse**

In consultation with the COP, an idea was suggested to “consider the merits of a centralized clearinghouse of information, options and policies rather than a centralized program or institution, that all institutions of higher education can access and the establishment of standards and knowledge/skills framework to inform a centralized clearinghouse that may identify early on potential barriers and direct investments.”<sup>29</sup> This would include collaborating with academic and workforce leaders to assess RSI and identify new opportunities for development. This approach would take the work that has already been done and expand on it rather than reinventing the wheel.

The starting point would be exploring the existing degree pathways in Washington’s higher-education system to align those with apprenticeships, as well as data collection and reporting to better inform future policies and practices around RSI and degree completion. Transparency of current policies and practices for apprenticeship and higher education would also be key, as well as productive collaboration between apprenticeship and higher education. All entities involved must know and understand how both apprenticeship and education work in order to move forward with establishing standards and a framework for how credit for RSI is provided.

Additionally, in consultation with WSAC, they “would support the ability for the State to recognize apprentices when it comes to the state’s postsecondary attainment goal. With the state’s investment in Washington College Grant for Apprenticeships (WCG-A), it is also essential that the State allow for a streamlined and efficient process to ensure recipients of WCG-A are able to earn credit towards a degree.”<sup>30</sup> This work is currently occurring at every CTC. Washington State’s postsecondary attainment goal is all adults ages 25-44 in Washington will have a high school diploma or equivalent. Currently, 89% of adults ages 25-44 in Washington have a high school diploma or equivalent, and at least 70% of adults ages 25-44 in Washington will have a postsecondary credential.<sup>31</sup>

Overall, the goal of a centralized clearinghouse would be to foster an RSI credit for education system that provides apprentices with quality consultation and more career pathway opportunities that may lead to attaining a valuable degree.

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<sup>29</sup> Correspondence to the Department of Labor & Industries. COP, August 21, 2023

<sup>30</sup> Correspondence to the Department of Labor & Industries. WSAC, September 13, 2023

<sup>31</sup> <https://wsac.wa.gov/sites/default/files/00.RoamdapGoalsActionsCouncil.pdf>

## Conclusion

This report summarizes the WSATC's efforts, in consultation with stakeholders, to explore whether the state should establish an institution, or centralized program, for apprentices to receive related supplemental instruction for credit toward a degree.

The current system for receiving credit toward a degree for RSI is decentralized. Based on discussions with community partners and stakeholders, three possible structures emerged: (1) continue to operate under the current RSI credit system; (2) create a new Apprenticeship Institution; or (3) create a centralized system (clearinghouse) to support collaboration across the apprenticeship and higher-education systems. The centralized system would be a viable option if every apprenticeship sponsor and training partner agreed on common standards and curriculum by occupation. This would provide the opportunity for programs to build in general education requirements providing a pathway to two-year degree completion and a journey-level card at the same time. There are pros and cons with each approach, however, the findings outlined in this report are inconclusive, as there is still significant research and collaboration needed to provide an educated and informed recommendation. The WSATC looks forward to future collaboration with all partners involved, specifically WSAC, as part of their further research on whether the state should establish an institution or centralized program to render a degree.