

ALABAMA WORKFORCE INVESTMENT SYSTEM
Office of Workforce Development
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July 23, 2007

GOVERNOR'S WORKFORCE DEVELOPMENT DIRECTIVE NO. PY2007-03

SUBJECT: Training and Employment Guidance Letter (TEGL)

1. **Purpose.** This transmits the following TEGL:

<u>Number</u>	<u>Date</u>	<u>Subject</u>
2-07	7/12/2007	Leveraging Registered Apprenticeship as a Workforce Development Strategy for the Workforce Investment System

2. **Discussion.** TEGL No. 2-07 is to provide information and resources to support the use of Registered Apprenticeship by the workforce investment system as an effective approach to building a skilled and competitive workforce in regional economies.

The 21st century economy demands a workforce with postsecondary education credentials, and the adaptability to respond immediately to changing economic and business needs. Registered Apprenticeship, a critical postsecondary education, training, and employment option available in every state in the country, is an important component of these talent development strategies.

3. **Action.** This information is provided for informational and potential action purposes.

4. **Contact.** Please direct any questions regarding this information to the USDOL Regional Office.



Steve Walkley, Division Director
Workforce Development Division

Attachment: TEGL No. 2-07

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSIFICATION Registered Apprenticeship/ Workforce Investment System
	CORRESPONDENCE SYMBOL OA/OWI
	DATE July 12, 2007

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 2-07

**TO: ALL STATE WORKFORCE AGENCIES
ALL STATE WORKFORCE LIAISONS
ALL STATE WORKFORCE INVESTMENT BOARDS AND STAFF
ALL LOCAL WORKFORCE INVESTMENT BOARDS AND STAFF
ALL BUSINESS RELATIONS GROUP STATE LIAISONS
ALL STATE RAPID RESPONSE COORDINATORS
OFFICE OF APPRENTICESHIP FIELD TECHNICIANS
OFFICE OF APPRENTICESHIP STATE AND REGIONAL
DIRECTORS
STATE APPRENTICESHIP DIRECTORS**

FROM: EMILY STOVER DeROCCO 
Assistant Secretary

SUBJECT: Leveraging Registered Apprenticeship as a Workforce Development Strategy for the Workforce Investment System

1. Purpose. The purpose of this Training and Employment Guidance Letter (TEGL) is to provide information and resources to support the use of Registered Apprenticeship by the workforce investment system as an effective approach to building a skilled and competitive workforce in regional economies.

The 21st century economy demands a workforce with postsecondary education credentials, and the adaptability to respond immediately to changing economic and business needs. The public workforce system is playing a leadership role in meeting these demands by catalyzing the implementation of innovative talent development and lifelong learning strategies that will enable American workers to advance their skills and remain competitive in the global economy. Registered Apprenticeship, a critical postsecondary education, training, and employment option available in every state in the country, is an important component of these talent development strategies. Registered Apprenticeship is business- and industry-driven, with more than 29,000 programs impacting 250,000 employers and almost 450,000 apprentices – predominantly in high-growth industries that face critical skilled worker shortages now and in the foreseeable future. Full collaboration between the publicly funded workforce

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investment system and Registered Apprenticeship leverages each system's strengths to maximize the benefits in the context of regional talent development strategies.

This TEGL provides information, examples, and policy guidance to support the full integration of Registered Apprenticeship into workforce system activities. The document is one of a number of products that the Employment and Training Administration (ETA) is releasing to assist regions in developing Workforce Investment Act and apprenticeship efforts that are mutually supportive.

2. References. The Workforce Investment Act, Title I (P.L. 105-220 - August 7, 1998); 20 CFR parts 663, 665, and 666; National Apprenticeship Act (P.L. 75-308); The Wagner-Peyser Act (29 USC 49 et seq.); Training and Employment Guidance Letter No. 17-05, "Common Measures Policy for the Employment and Training Administration's Performance Accountability System and Related Performance Issues;" Training and Employment Guidance Letter No. 18-05, "Using Workforce Investment Act Funds to Serve Incumbent Workers and Employed Workers;" Training and Employment Guidance Letter No. 13-06, "Instructions for Workforce Investment Act and Wagner-Peyser Act State Planning and Waiver Requests for Years Three and Four of the Strategic Five-Year State Plan (Program Years 2007 and 2008);" Training and Employment Notice No. 17-06, "Vision for 21st Century Apprenticeship;" Training and Employment Guidance Letter No. 28-05: The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA): "Expanding ETA's Vision for the Delivery of Youth Services under WIA to include Indian and Native American Youth and Youth with Disabilities;" and Training and Employment Guidance Letter No. 3-04: "The Employment and Training Administration's (ETA's) New Strategic Vision for the Delivery of Youth Services Under the Workforce Investment Act (WIA)."

3. Overview of the National Registered Apprenticeship System. Registered Apprenticeship is a national training system that combines paid learning on-the-job and related technical and theoretical instruction in a skilled occupation. The purpose of a Registered Apprenticeship program is to enable employers to develop and apply industry standards to training programs that can increase productivity and improve the quality of the workforce. In the United States today, 250,000 separate employers offer Registered Apprenticeship employment and training to almost 450,000 apprentices in such industries as construction, manufacturing, transportation, telecommunications, information technology, biotechnology, retail, health care, the military, utilities, security, and the public sector. By providing on-the-job learning, related classroom instruction, and guaranteed wage structures, employers who sponsor apprentices provide incentives to attract and retain more highly qualified employees and improve productivity and services. Regions that adopt robust Registered Apprenticeship programs in the context of economic development strategies create seamless pipelines

of skilled workers and flexible career pathways to meet current and future workforce demands.

Principal Partners. The National Registered Apprenticeship system is a partnership among DOL, State agencies, industry leaders, employers, employer associations, labor-management organizations (primarily consisting of labor organizations and employers), and educational institutions. Industries, in partnership with state and federal apprenticeship offices, develop and operate apprenticeship programs based on the skills and knowledge that business and industry needs from its employees, ensuring that apprentices develop up-to-date and relevant skills. Program sponsors, which include employers, employer associations, and labor-management organizations, voluntarily operate and cover most or all costs of the program. The programs are registered with DOL or a federally recognized State Apprenticeship Agency (SAA). Through a formal apprenticeship agreement, program sponsors and apprentices agree to the requirements of the registered program.

The National Apprenticeship Act (NAA) (also known as the Fitzgerald Act), enacted in 1937, authorizes the Federal government, in cooperation with the states, to oversee the nation's apprenticeship system. DOL's Office of Apprenticeship (OA), in conjunction with SAAs, is responsible for registering apprenticeship programs that meet Federal and State standards, issuing Certificates of Completion to apprentices, encouraging the development of new programs through outreach and technical assistance, protecting the safety and welfare of apprentices, and assuring that all programs provide high quality training to their apprentices. DOL/OA staff in 24 states and SAA staff in 26 states, the District of Columbia, and three territories share these responsibilities.

Apprenticeship Program Structure. Registered Apprenticeship programs offer employment and a combination of on-the-job learning and related technical and theoretical instruction through a training provider. Apprentices are employed at the start of their apprenticeship and work through a series of defined curricula until the completion of their apprenticeship programs.

The duration of training, and the skills and competencies required for mastery, are driven by industry. Traditional apprenticeship programs require a specific number of hours of on-the-job training. Increasingly, industries are requiring competency-based training programs that reflect mastery of key skills and allow motivated workers to progress at their own pace. Currently, the Registered Apprenticeship system approves time-based, competency-based, and a hybrid of time- and competency-based programs, and helps industries transition to competency-based apprenticeship programs for enhanced effectiveness.

Certifications earned through Registered Apprenticeship programs are recognized nationwide as portable industry credentials. The primary apprentice certification is a

Certificate of Completion, which is awarded at the end of the apprenticeship. Many apprenticeship programs – particularly in high-growth industries such as health care, advanced manufacturing and transportation – also offer interim credentials and training certificates based on a competency model that leads to a Certificate of Completion. There may be beginning, intermediate, advanced, and specialty certification levels. Registered Apprenticeship programs also allow credit for previous apprenticeship-related experience.

4. Pre-Apprenticeship Strategies. For workers who may not have the fundamental skills to succeed in a Registered Apprenticeship program and youth who are exploring career options, pre-apprenticeship training programs act as a bridge. These training programs, which are operated by education, community- or faith-based organizations, can help apprenticeship candidates decide on an occupational track, develop foundational skills, and improve productivity once employed. Pre-apprenticeship programs operate an approved plan under which candidates participate in a short, intensified training period in a school or training center, with the intent to place them into Registered Apprenticeships upon completion or soon after completion of the program. Pre-apprenticeship can be used as a means of selecting apprentices under a particular program sponsor's approved program standards. DOL recognizes pre-apprenticeship programs, but does not formally register them. Many pre-apprenticeship programs also operate in partnership with the workforce investment system.

5. Benefits of the Registered Apprenticeship Training Model. Registered Apprenticeship is a key component to the nation's talent development strategies in many high demand industry sectors. This unique, industry-driven training is a proven, effective method with many benefits.

For employers, benefits include:

- Skilled workers trained to industry/employer specifications to produce quality results.
- Increased productivity and knowledge transfer due to well-developed on-the-job learning.
- Enhanced retention. In FY 2006, 82 percent of registered apprentices were still employed nine months after registration as apprentices.
- A stable pipeline of new skilled workers. Apprenticeship programs offer a predictable pipeline of program completers, while established pre-apprenticeship programs provide access to the next generation of workers.
- An emphasis on safety training that may reduce worker compensation costs.

For apprentices, benefits include:

- Immediate employment in jobs that usually pay higher wages and offer career growth opportunities. In FY 2006, the average starting wage for an apprentice was \$12.16.
- Higher quality of life and skills versatility.
- Portable credentials recognized nationally and often globally.
- Formal articulation agreements between apprenticeship training programs and 2- and 4-year colleges that create increased opportunities for college credit and future degrees.

6. Registered Apprenticeship Aligns with Workforce System Priorities. Registered Apprenticeship is a highly versatile training strategy that aligns with and advances the goals of key workforce investment system initiatives. Features of Registered Apprenticeship, including its customized format, the extensive industry knowledge of state and federal apprenticeship staff, and its significant employment, retention, and wage outcomes, make the program an effective means of meeting workforce system goals. By coordinating and collaborating with the knowledgeable professionals that make up the Registered Apprenticeship system, the workforce system can increase the quality of its services to both its employer and worker customers and enhance activities in support of current workforce system priorities. Apprenticeship is an important addition to the suite of potential education and training services the workforce system provides to its customers. Below are goals of the workforce system that can be met by incorporating apprenticeship as a workforce strategy.

Increasing access to workforce education and training. Adult learners with families and financial obligations frequently are unable to stop working while they gain additional education or workforce skills. Young adults may not be able to go to school full time without benefit of a job. Registered Apprenticeships are "earn and learn" opportunities and provide access to education and training that may not otherwise be accessible to many adults.

Designing innovative programs that fuel regional economic competitiveness and create employment opportunities for career seeker customers. Registered Apprenticeship training can be a valuable tool in the broader suite of talent development approaches that support competitive regional economies and flexible talent that can adapt as jobs grow and/or change. As an employer-driven model for competency development and skill mastery, Registered Apprenticeship can support the development and advancement of worker pipelines for both emerging and established employers and regional industry sectors. Because apprenticeship programs include immediate employment for apprentices, they are an excellent option for dislocated workers and others who are transitioning from declining industries. Registered Apprenticeship programs can also be an important part of industry growth strategies in regions where significant reskilling of the workforce needs to take place. Implementing apprenticeship and pre-

apprenticeship models that are aligned with growth strategies for regionally-critical industry sectors and clusters creates opportunities for workers at all levels of the career ladder to up-skill and advance to meet evolving skill needs, and provides employers with the talented human capital needed for economic prosperity.

Meeting the needs of at-risk youth. Apprenticeship is an important talent development option for youth as they seek postsecondary education and training that will lead to career opportunities in demand-driven occupations. Registered Apprenticeship and pre-apprenticeship programs provide many benefits that allow the workforce investment system to respond to the call of DOL's Youth Vision. In addition to the industry-driven nature of apprenticeship training, apprenticeship involves high school, community colleges, and technical or alternative schools in the delivery of job-related classroom instruction. Apprenticeship also provides youth with the opportunity to earn while they learn, offers professional development and employability skills training curricula, such as that available from SkillsUSA, and incorporates instruction that leads to the completion of a high school diploma or GED.

7. Call to Integrate Apprenticeship throughout the Workforce Investment System. In a demand-driven environment, the public workforce system, at the federal, state, and local levels, works collaboratively with business and industry, economic development, education, training providers, and other key partners on talent development strategies and workforce solutions to provide workers with the skills businesses need. Registered Apprenticeship is a potential workforce solution that contributes to the development of industry-defined competencies, and also serves as a proven industry-driven workforce education and preparation strategy for workers.

The Registered Apprenticeship system is administered by ETA and represents a significant investment of knowledge, systems, and resources in our nation's talent development strategies. Registered Apprenticeship opportunities can and should be integrated throughout the workforce investment system as a means of leveraging resources across systems to better serve regional needs. In order to ensure that apprenticeship is consistently integrated into service delivery strategies for businesses and the workforce, it is critical to support collaboration between the apprenticeship infrastructure, the workforce investment system, and the continuum of education at all levels. Strategies for collaboration and integration are discussed below. Specific examples of state and local collaborative efforts are provided in more detail in Attachments A and B. Attachment C provides contact information for specific models. Attachment D provides informational tools and resources to support development of new registered apprenticeship opportunities and models.

WIA State and Local Strategic Planning. State and local Workforce Investment Boards (WIBs) have an opportunity to support integration of Registered Apprenticeship

through their regular strategic planning processes for WIA and the Wagner-Peyser Act. One highly effective strategy is to include apprenticeship training as a workforce strategy in the WIA state and local plans as a workforce solution for growing skills in targeted industry sectors.

Business Engagement Strategies. WIBs and/or One-Stop Career Centers can integrate apprenticeship into business engagement strategies by encouraging the development of new apprenticeship programs as a solution to meet business customer needs. WIBs and One-Stops can leverage business relationships and engage businesses jointly with apprenticeship staff. WIBs can further enhance strategic regional partnerships by integrating apprenticeship programming into their strategies for talent development and linking apprenticeship programs to other economic development entities and school district administrations, alternative education programs, adult basic education programs, prisons, and city, county, and state governments. An important asset that can be marketed to employers is the ability of apprenticeship staff to develop competency models which break the skills needed for any particular task into learning objects that then become the foundation for classroom curricula and training. This ensures that apprentices achieve the right skills to meet industry needs.

Expanding Available Eligible Training Providers for ITAs. The WIA statute and regulations explicitly provide for flexibility in determining registered apprenticeship training programs as initially eligible providers of ITA-funded training services. This enables expanding the available training options to ITA recipients. Specifically, the WIA regulations at 20 CFR 663.505(b)(2)(ii) identify entities that carry out programs under the National Apprenticeship Act (NAA) as potential eligible providers of training services, and the WIA regulations at 20 CFR 663.515(b) empower local WIBs to determine the eligible training provider application procedures for apprenticeship programs registered under the NAA. As such, apprenticeship programs may benefit from streamlined processes for becoming initially approved as eligible providers of training to ITA recipients, without having to undergo the standard State agency review process (20 CFR 663.515(d)).

One-Stop Career Center Operations. At the One-Stop Career Center level, a range of programmatic and operational activities can support closely integrated and coordinated functions.

- *Career Guidance Strategies.* Referral to apprenticeship and pre-apprenticeship programs can be routinely integrated into the career guidance and career exploration services offered through the One-Stop Career Center system, both virtually and as part of staff-assisted services.
- *Service Delivery Design.* Co-locating apprenticeship staff in One-Stop Career Centers allows them to work collaboratively with WIA case managers and veterans' representatives to place career seekers with apprenticeship sponsors

and to market and establish programs. Even when programs are not co-located, One-Stop Career Center and Registered Apprenticeship staff can be encouraged to work together to market apprenticeship and refer appropriate candidates.

- **Coordinated Education and Career Outreach.** One-Stop Career Centers can co-sponsor career fairs and other outreach activities related to education and career opportunities with local representatives of the Registered Apprenticeship system, and can market apprenticeship opportunities to both employers and workers.
- **Coordination for Pre-Apprenticeship.** One-Stop Career Center staff can coordinate the development of pre-apprenticeship or training venues between participating Registered Apprenticeship programs and community-based organizations committed to provide related work experience to prepare candidates for Registered Apprenticeship.

Policy Development and Funding Strategies. Collaboration with apprenticeship can be further enhanced through the development of policies that facilitate and encourage partnership. For instance, states may issue policy to provide guidance around the operation of such partnerships, and to highlight models of successful collaboration. States and local areas may organize regular roundtables or other policy forums in which workforce system, apprenticeship system, education, and employer stakeholders are brought together to discuss policy issues and explore collaborative opportunities. State and local workforce system leaders may explore opportunities for leveraging existing workforce system funding with other funding sources to support and advance apprenticeship models. A more detailed discussion of opportunities to leverage funding follows.

8. Funding Sources to Support Registered Apprenticeship. Historically, employers, industry associations, and labor-management organizations have been instrumental in developing and funding Registered Apprenticeship programs. The public workforce system has an important role to play in leveraging and advancing these investments. This can be accomplished both through workforce system funding strategies, and through the system's unique position as the convener and catalyst of a broad array of workforce and economic development partners, all of whom have a stake in the acceleration of competency-based education and training models that enable workers to meet the evolving skill needs of the 21st century work environment. Workforce system leaders, with their education and employer partners, can play the critical role of identifying and aligning funding that may support both theoretical and practical education, advancing skills upgrading models, and supporting workers' career advancement based on increasing mastery of the skills required in current and emerging workplaces. In today's economy, states and economic regions must continuously identify new approaches to ensuring that the education levels of the current and projected workforce align with the anticipated skill and competency needs

of both established and emerging industries. The workforce system can support these efforts by ensuring that the full complement of education, employer, and economic development partners, including new or "non-traditional" partners, are at the table and involved in discussions related to the alignment and commitment of resources to support innovative training and advancement models.

Leveraging Workforce Investment Act Funding. Ensuring that apprenticeship is included as part of the full complement of education and training resources provided to job seekers and employers presents multiple opportunities for the public workforce system to leverage WIA funds in innovative and creative ways. The Workforce Investment Act provides the workforce system with significant flexibility to implement responsive training and education solutions, and state and local workforce system leaders are urged to consider ways in which their existing WIA training resources may be invested strategically to support apprentices and apprenticeship sponsors. For example, while most Registered Apprenticeship programs are funded by program sponsors, the workforce system can help to expand apprenticeship programs regionally by strategically deploying WIA funds to temporarily offset training costs for employers who might need to understand the potential returns on their investment before undertaking significant training costs. See Attachment B for specific examples of how states are using WIA funds to offset training costs.

Individual Training Accounts (ITAs)

ITAs, described at 20 CFR 663.400 - 663.440, are training and education financing accounts established on behalf of eligible adults and dislocated workers that enable these individuals to purchase training for in-demand occupations and careers from eligible providers of their own choosing. Both employed and unemployed adults and dislocated workers may be eligible to receive ITAs, though employed individuals must be determined to be in need of training services to obtain or retain employment that leads to self-sufficiency in order to receive ITAs (see 20 CFR 663.220 (b), 20 CFR 663.230, and 20 CFR 663.310, as well as the Preamble to the Final Rule for WIA, 65 Fed. Reg. 49294, 49326, Aug. 11, 2000). As the primary method of training service purchase and delivery in the public workforce system, ITAs can provide eligible apprentices with financial support for the related instruction portion of their apprenticeships. In addition, ITAs may be used to provide eligible individuals with access to pre-apprenticeship training in preparation for formal apprenticeships.

The use of ITAs to support the related instruction (e.g., classroom and distance learning) portion of apprenticeship training or pre-apprenticeship training may be advantageous for a number of reasons. ITAs support customer choice in selecting training providers, empowering apprentices and pre-apprentices to make informed education and career decisions. WIA funded training must be directly linked to employment opportunities in the local area (20 CFR 663.310(c)). This can be a useful

tool to support Registered Apprenticeships' focus upon employer-driven training design and delivery.

When WIBS and One-Stop Career Centers use ITAs as a mechanism to support apprenticeships, it is important to remember the eligibility requirements associated with the WIA Adult and Dislocated Worker programs. Another consideration to keep in mind is that ITAs are only available to eligible individuals who are unable to obtain grant assistance from other sources to pay for education and training (such as State-funded training funds, Pell Grants, and Trade Adjustment Assistance), or who require assistance beyond that which is available from other grant sources in order to pay for the costs of training (see 20 CFR 663.310(d) and 20 CFR 663.320(a)(2)). The intent of these limitations is to ensure that complementary education and training resources are leveraged to the greatest extent possible, and to reduce duplication in service provision. Thus, in designing education, apprenticeship program sponsors and local WIBs should jointly identify the full complement of education and training funding available in the area.

Customized Training Models

When working with employers on training and workforce solutions, WIBs and One-Stop Career Centers may find it valuable to utilize customized training to subsidize the classroom training portion of an apprenticeship model. For example, a local WIB could offer a particular course of training for apprenticeship sponsors in a targeted sector, such as advanced manufacturing, across a region whose economic base revolves around this sector.

Local WIBs could also offer "linked" courses of training across connected industry sectors, such as construction and transportation, to more broadly support the economic clusters driving job growth in that particular region. This approach provides the ability to leverage employer investments with WIA funding to increase the skilled labor pool in a regional economy.

Customized training is typically based upon a contractual agreement between a local WIB and an employer (or group of employers) to provide specialized training to employees. Under WIA, both potential new hires and incumbent employees may participate in customized training, though incumbent employees must be determined by the local WIB to not be earning self-sufficient wages in order to participate (20 CFR 663.720(a)), and their training must be related to the introduction of new technologies in the workplace, skills upgrading for new jobs, or other related purposes (20 CFR 663.720(c)).

Customized training arrangements entail the commitment by the employer to hire trainees after successful training completion, or to continue to employ incumbent

employees after successful training completion (20 CFR 663.715(b)). In addition, employers that enter into customized training agreements under WIA typically pay for at least 50 percent of the cost of the training (20 CFR 663.715(c)), though ETA has granted waivers of this matching requirement to allow for employer match on a sliding scale, based upon business size. Under the waiver, the following scale is permitted in two targeted categories of business with 100 or fewer employees:

- No less than 10 percent match for employers with 50 or fewer employees, and
- No less than 25 percent match for employers with 51 - 100 employees.

WIA-funded customized training models offer several operational advantages that facilitate their use in the Registered Apprenticeship context. Customized training may be designed and delivered for multiple employers, such as in an industry sector, or for groups of targeted employees of a single employer, creating the opportunity to develop economies of scale that truly maximize and leverage the contribution of the workforce system and participating employers. In addition, while providers of customized training must meet the performance requirements outlined at 20 CFR 663.595, they are not subject to the other requirements for eligible training providers outlined in 20 CFR 663, Subpart E, or in WIA Section 122. These streamlined requirements for eligible providers of customized training may facilitate the ability of apprenticeship sponsors to collaborate with the public workforce system in the design and delivery of programs of customized training. Finally, in states that have obtained waivers to permit small- and medium-sized employers to fund customized training on a sliding scale below the mandated 50 percent, customized training provides a flexible model for assisting these smaller businesses in expanding their talent pool and upgrading the skill levels of current employees.

On-the-Job Training (OJT)

Defined at WIA Section 101(31), OJT can be a useful training methodology for employers wishing to upgrade the skills of new hires and incumbent workers and keep workplaces current with the evolving skill and technology demands of the 21st century economy. Under traditional OJT partnerships, employers fund and deliver skills upgrade training at the workplace to participating employees, and the public workforce system leverages employers' training investments by contributing up to 50 percent of the OJT participants' wages, in recognition of the costs associated with providing the training (20 CFR 663.710). Like customized training models, OJT may provide apprenticeship sponsors with a talent development strategy that supports apprentices' increasing mastery of technical skills. Furthermore, because the content of OJT is largely designed by employers, the workforce system may find that this training model is an attractive tool for increasing and expanding its partnership with Registered Apprenticeship programs.

Similar to WIA-funded customized training models, OJT also offers several operational advantages that may facilitate workforce system and Registered Apprenticeship collaboration. Like providers of customized training, providers of OJT may take advantage of the streamlined eligible training provider requirements outlined at 20 CFR 663.595. In addition, ETA has granted waivers to states to increase their capacity to offer OJT as a talent development strategy for small- and medium-sized businesses. Under this waiver, approved states may match employers' training contributions up to 75 percent for businesses with 100 or fewer employees, which may provide an attractive incentive for smaller apprenticeship sponsors to partner with the public workforce system in the design and delivery of the OJT component of Registered Apprenticeship.

WIA State-wide Reserve and Other State Funding Sources

Governor's statewide 15 percent funds, reserved under WIA Section 128(a) for statewide activities, provide the most flexible WIA funds available to states. Up to 15 percent of funds allotted to states for adult, dislocated worker, and youth activities may be reserved by the Governor for statewide workforce investment activities and may be combined and used for any of the activities authorized in WIA Sections 129(b), 134(a)(2)(B), or 134(a)(3)(A) (which are further described in 20 CFR 665.200 and 665.210) regardless of originating funding streams. The Act and the regulations identify required statewide activities and other optional activities; these lists, however, are not all-inclusive. States have considerable flexibility to develop and implement these and other activities, including apprenticeship and pre-apprenticeship models, using reserve funds, as long as these activities are consistent with the purpose of WIA. Because individuals served with Governor's 15 percent reserve funds are not subject to the eligibility requirements of the respective funding streams from which the reserve is drawn, these funds offer a particularly flexible way to develop and grow training and education partnerships for pre-apprentices and apprentices.

Local activities funded with WIA Adult and Dislocated Worker program formula funds must conform with the eligibility requirements associated with these funding streams. States may want to seek waiver authority to allow greater flexibility in using funds to support apprenticeships. ETA has granted waivers to states to enable local areas to use up to 50% of their Adult and Dislocated Worker funds as though it were state set-aside funding, which makes the funding much more flexible and eliminates the need to determine eligibility.

In addition, incentive funds received by states under WIA Title V - General Provisions, Sections 503(a) and 503(b) and described at 20 CFR 666.200 and 666.210 are also highly flexible, and provide an opportunity for states to implement creative programs in partnership with apprenticeship sponsors. States may use these funds to carry out innovative programs under WIA Titles I and II and the Carl D. Perkins Vocational and Technical Education Act, regardless of which Act is the source of the incentive funds.

Should states wish to modify their approved incentive grant plans and corresponding grant documents to incorporate models for leveraging incentive funding for pre-apprenticeship and/or Registered Apprenticeship, the Department will work with states to make any necessary and allowable modifications.

State workforce system leaders and apprenticeship stakeholders are strongly encouraged to consider other state funding sources to support and advance innovative pre-apprenticeship and Registered Apprenticeship. Other potential sources of funding for apprenticeship programs include state general revenue funds as well as other funds appropriated by state legislatures, such as state education monies targeted for career and technical education.

9. WIA Performance Measures and Apprenticeship. Apprenticeship strategies offer the opportunity for states and local WIBs to enhance their performance under the Workforce Investment Act. Apprenticeship is a proven model for effectively educating and training workers, promoting retention, and advancing the apprentice's career and earnings. Below is information related to performance measurement that may be useful to consider when integrating apprenticeship as an employment or training opportunity provided under WIA and/or Wagner-Peyser.

Registered Apprenticeship as Employment. WIA and Wagner-Peyser clients who receive core and intensive services resulting in their entry into a Registered Apprenticeship program become employees of the Registered Apprenticeship sponsor and can be tracked against Common Measures associated with employment.

Registered Apprenticeship as Training. Apprentices who receive WIA services after enrollment in Registered Apprenticeship to support classroom or on-the-job training, or to provide other services, should be treated as incumbent workers. Retention and earnings outcomes should be tracked in this case, but not the placement outcome.

Identifying the Point of Exit. For the purposes of tracking and common measures, WIA and Wagner-Peyser clients associated with apprenticeship programs should be exited from the workforce system after the completion of WIA/Wagner-Peyser associated activities. It is not necessary to track apprentices through to the completion of their apprenticeship program unless they are supported by workforce system resources for the entire duration. Thus, an apprentice who receives workforce system resources to support specific portions of classroom training may be exited from the program upon completion of that training, even if they continue in the apprenticeship program for a longer period of time.

Tracking Earned Credentials. The workforce system should track only those credentials that are earned by an apprentice while they are enrolled in WIA or Wagner-Peyser.

Where tracking of earned credentials is required, the workforce system should track the interim credential earned by the apprentice while co-enrolled. For example, apprentices in competency-based programs may receive a Certificate of Training upon completion of each level working towards a Certificate of Completion. Additionally, many apprenticeship sponsors have negotiated articulation agreements with community and technical colleges that give college credit for the related instruction component of the program. All of these interim credentials may be recorded as appropriate credentials for the purposes of reporting under the Common Measures.

Please note that the DOL Office of Apprenticeship (OA) tracks cohorts of apprentices throughout their participation in the Registered Apprenticeship system for the purpose of reporting outcomes and drawing conclusions about program effectiveness. The Common Measures are also used for this purpose.

10. Action Required. Registered Apprenticeship is a critical component of talent development strategies across the country. With the combination of on-the-job learning, related instruction, and mentoring, the apprenticeship model is a powerful tool for addressing the skill shortages that many industries face. It also provides the grounded expertise and knowledge individuals need to do their jobs well and advance in their careers. The model offers an efficient, flexible training strategy, responsive to new technology that will keep workers up-to-date on skills they need to do their jobs.

In the current environment of global economic competition, it is critical that the workforce investment system integrate the resources of the Registered Apprenticeship system into its talent development strategies. ETA urges state and local leaders to consider the benefits of Registered Apprenticeship while developing their workforce investment systems plans and programs and to fully utilize apprenticeship as a unique model that incorporates employment, postsecondary education, and training. Some next steps to consider include.

- Mapping existing Registered Apprenticeship programs in your region.
- Strengthening collaborative relationships between WIBs and apprenticeship staff to explore opportunities to leverage Registered Apprenticeship as a significant workforce development strategy.
- Educating One-Stops Career Centers and WIBs about Registered Apprenticeship, including how to collaborate with apprenticeship staff, how to use WIA funding in support of Registered Apprenticeship, and how Registered Apprenticeship applies to performance outcomes under the Common Measures.

- Discussing apprenticeship as a workforce tool with leaders focused on workforce issues, such as legislators, governor, mayors, county executives, council members, and department heads, and sharing with them the concepts addressed in this TEGL.
- Adopting policies and procedures to better integrate Registered Apprenticeship training as an option offered by the workforce investment system using, but not limited to, the examples found in this TEGL.
- Encouraging Registered Apprenticeship sponsors to contact their local WIBs to inform them about their training programs, inquire about becoming eligible training providers, and discuss opportunities for collaboration and partnership.

11. Inquiries. Questions should be directed to the appropriate ETA Regional Office, Office of Apprenticeship Regional Director, or State Director. Contact information can be found in Attachment D.

Attachment A

Promising Practices in Integrating Registered Apprenticeship and Public Workforce System Activities

Several states have integrated the Registered Apprenticeship model at various levels of state government as a tool to help employers meet their workforce needs and for individuals – from high school to adult learners – to enhance their career paths. Although no state is yet using the model to its maximum capacity, several states are creatively applying Registered Apprenticeship as an important workforce and career solution. The following are examples of some states that have used the Registered Apprenticeship model in innovative ways to address many economic development and workforce challenges of its business community.

Washington State

Leaders in Washington State have integrated Registered Apprenticeship into workforce strategies in a broad way. They not only use WIA funding to support training programs, but Registered Apprenticeship is included in the state strategic plan as a workforce tool. They also bring together support from other public sources, most notably the state legislature which has appropriated general funds for a variety of Registered Apprenticeship programs including outreach and awareness to schools and businesses and supporting related instruction and on-the-job training. WIA discretionary dollars have been used for programs; the WIBs and One-Stops have provided funding and support.

State Plan

The Washington State strategic workforce plan incorporates language calling for the expansion of Registered Apprenticeship training in emerging fields and expansion of preparation programs for apprenticeship in high-demand clusters. Additionally, they include language to develop new programs and to increase student enrollments and apprenticeship retention and completion.

As a result of the state's workforce policies on Registered Apprenticeship, Washington has –

- Advanced development of Registered Apprenticeship programs in health care, information technology, maritime/transportation, energy, public utilities, and advanced manufacturing among the high-growth industries.
- Prepared individuals to enter Registered Apprenticeship programs or gain employment in supportive roles in industries that use the apprenticeship model.

- Supported projects to provide training to more than 500 pre-apprentices and apprentices in food processing, biotechnology, communications, health care, construction and manufacturing.

WIA Funding

WIA state-wide reserve funds have been used for Registered Apprenticeship programs through competitive solicitations.

Local WIBs and One-Stops

The Pierce County WIB funded an innovative program, *Get Electrified*, an Electrical School to Apprenticeship program, offered to high school juniors in the Tacoma School District. It is a pre-apprenticeship program that prepares students to meet the rigorous application requirements of an electrical apprenticeship. During the nine-week summer program, students attend work and class and earn a wage for work done. Upon completion of high school, the graduate can enter a Registered Apprenticeship program in electrical work.

Apprenticeship Integration into K-12, and Post-secondary Education Systems

The state has embraced Registered Apprenticeship as a career path in and of itself as well as a path in conjunction with community college and a four-year degree, as many of the training programs require an advanced degree. Now state leaders see the importance of career and educational guidance starting in middle school and are incorporating information about apprenticeship into that effort.

The state legislature has recently funded an initiative by the Department of Labor and Industry to enhance an Educational Guidance model for 6th through 12th graders, *Navigation 101*, which shows students various careers and what classes and activities they need to pursue for the job. The model includes a lively, student-friendly website, curriculum, and other material. Information on Registered Apprenticeship is prominently featured.

The legislation also:

- Authorized existing Community Colleges' Centers of Excellence to compile and provide information related to grants, scholarships, job openings, and growth industries;
- Required the Washington State Apprenticeship and Training Council (WSATC) to lead an educational outreach program about apprenticeships for students and educators; and
- Required the Washington State Apprenticeship Training Council to manage direct-entry programs, including awarding ten incentive grants for school districts to negotiate and implement agreements with local apprenticeships.

Inter-agency collaborations

The legislature passed a law to allow the Washington State Department of Transportation to implement an apprenticeship program for Washington State Department of Transportation construction. This apprenticeship utilization requirement started with local municipalities and private contractors 12 years ago and has grown over the years to include school districts, counties, other state agencies and private work also to encourage the development of more opportunities for young people.

The Washington State Apprenticeship Program Manager is an active participant and member of the Washington State Workforce Education and Training Coordinating Board Interagency Committee and attends their regularly scheduled meetings. At these meetings, the program manager is able to talk with other state agencies' representatives about how apprenticeship can be better integrated with other State workforce investment system partners. Apprenticeship in Washington State aligns with the Governor's economic plan called "Next Washington" and the Workforce Board's "Washington Works" report that reviews the workforce development system.

Next steps

Washington State would like to develop structured training on Registered Apprenticeship for all One-Stop Career Center staff to be more effective in educating the business community about the benefits of Registered Apprenticeship.

Kansas

Kansas State leaders have recognized the value of Registered Apprenticeship as a tool to help employers meet their workforce needs and the overall necessity to link workforce development to economic development.

State Organization of Registered Apprenticeship in Workforce Development

The state has looked at how structurally it can best organize government functions to meet their goals. To this end, state government was reorganized with many workforce functions placed in the Commerce Department including Registered Apprenticeship, Veterans Affairs, and WIA functions. These programs had previously been in the State Department of Labor. Among some of the other structural shifts, several Registered Apprenticeship staff members are housed in One-Stops across the state so they can work with employers seeking assistance.

Internal Staff Development

To better train its own staff, and to address the newly established roles and responsibilities under Public Law 107-288 and the requirements to develop a certification program, the Department of Commerce established a Registered

Apprenticeship program for Career Development Technician for the Disabled Veterans Outreach Program and Local Veterans Employment Representative staff.

WIA Funding

The state uses some of its 15 percent state set-aside funds to support Registered Apprenticeship staff.

Local WIBS and One-Stops

Several local WIBs fund components of Registered Apprenticeship programs including the cost of related instruction, uniforms and tools for apprentices. WIA Incumbent Worker monies are used to help Registered Apprenticeship programs in manufacturing, construction, and health care in four of the five workforce investment regions in the state. Additionally, the Department of Social and Rehabilitation Services funds the Early Childhood Associate Apprenticeship program through a grant.

**Additional Examples of Apprenticeship Integration
in the Workforce System**

Action	State
Include apprenticeship in the WIA state plan	AK
	MO
	WA
Apprenticeship and WIA functions located in same department	HI
	KS
State Apprenticeship Council member sits on the state WIB	NC
Co-locate apprenticeship staff in One-Stop Career Centers	KS
	VT
One-Stop and Apprenticeship staff jointly market apprenticeship even when not co-located	NC
	OH
	OR
Use Registered Apprenticeship for staff development	KS
Link apprenticeship programs to other public entities such as school districts, prisons, and city, county and state governments.	PA
	NC
	OR
	WA
Integrate the apprenticeship electronic database with the state job-matching system	OH
	OR
	VT

Attachment B Use of Workforce Investment Act Funds to Support Registered Apprenticeship

Activity				
Encourage entities to sponsor and register new programs and occupational training, including the cost of OJT and related instruction	Guam in partnership with the Guam Shipyard and Guam Power Authority. Since inception, nearly \$1.4 million in WIA funding has been invested in salaries, benefits, and educational assistance.	The Durham, North Carolina WIB recently issued a RFP for a health care initiative using the DOL Health Career Lattice model, which integrates apprenticeship for the Certified Nursing Assistant level. The Winston-Salem WIB granted \$15,000 to a tool & die trade program.	Pennsylvania's Job Ready program, which is a combination of WIA and private funds, supports apprenticeship training programs. The local WIBs also regularly support apprenticeship training.	The West Virginia State WIB has funded apprenticeship programs in aerospace and wastewater treatment.
Provide related instruction or other education that satisfies specific apprenticeship requirements.	Kansas WIBS pay the cost of related instruction and purchase uniforms and tools for apprentices.	The Winston-Salem, North Carolina WIB provided \$37,000 to a sponsor to pay for related instruction for the Senior Maintenance Tech trade.	South Dakota provides \$50,000 to 10 sponsors to help pay for related instruction from the Governor's WIA Discretionary Fund.	
Supplement Apprentices' wages	Idaho and Boise State University will fund a pilot project in Advanced Manufacturing. The state will use \$50,000 from WIA set-a-side funds to pay half the apprentices' wages for the first three months. The university will fund the costs of related instruction for the first year.			
Provide on-the-job training/learning	Alaska's local workforce centers agree to pay up to 50 percent of the employers wage costs for the first 1,000 hours of apprenticeship. In this way, employers evaluate the trainee's soft skills and can make a reasonable assessment of the individual's capacity to complete the training.	Maryland used its WIA discretionary dollars to provide matching funds for customized training. In 2006, it granted a 50-50 match for an incumbent health care worker apprenticeship program.		

<p>Disseminate information about apprenticeship programs</p>	<p>Many states routinely co-sponsor career expos with the state apprenticeship office and the federal Office of Apprenticeship.</p>	<p>Maryland's state WIB has provided \$50,000 of its performance measures incentive funding to the State Apprenticeship Agency to market apprenticeship in the state.</p>		
<p>Pre-apprenticeship or preparatory training designed to provide related work experience to prepare candidates for Registered Apprenticeship</p>	<p>California's Greater Long Beach WIB sponsors a Construction Jobs Initiative which provides pre-apprenticeship training and builds connections between the One-Stop Centers and Registered Apprenticeship programs.</p>	<p>Pennsylvania's Lancaster County WIB has partnered with the Keystone Chapter of the Association of Builders and Contractors to conduct pre-employment training; the Wilkes-Barre WIB is partnering with the Building and Construction Labor-Management Council and local school districts to prepare at-risk youth to enter into apprenticeship programs.</p>	<p>Washington State supports pre-apprenticeship programs for 500 individuals in food processing, biotechnology, communications, health care, construction and manufacturing from the Governor's WIA Discretionary Fund.</p>	

Attachment B Other Funding Sources for Apprenticeship Program

Activity			
Encourage entities to sponsor and register new programs and occupational training including the cost of OJT and related instruction	Alaska's Denali Fund uses state Department of Labor funds to support tuition, instructor's wages, books, tools, required clothing, incidental stipends, lodging, transportation, and administration.	Guam signed into law the Guam Registered Apprentice Program (GRAP) to invest in skilled training in the form of tax incentives	Vermont's Workforce Education and Training Fund , a state program funded by the state legislature to help employers with workforce development issues, has regularly funded apprenticeship proposals.
To provide related instruction or other education that satisfied specific apprenticeship requirements.	Seventy percent of Guam's Manpower Development Fund goes to the Apprenticeship Training Program at the Guam Community College. The revenue source is registration fees on non-immigrant temporary workers.	Washington State Legislature awarded 10 incentive grants from the General Fund for school districts to negotiate and implement agreements with local apprenticeship programs.	The Texas Workforce Commission supports the apprenticeship program with \$1.6 million per year from General Revenue funds under Chapter 133 of the Texas Education Code. The program helps support the cost of classroom instruction.
To provide on-the-job training/learning	Alaska has a state training and employment program (STEP) which is funded by UI Trust fund contributions. Funds have been used for individuals who don't qualify for WIA support. STEP funds have been used for construction apprenticeships.		
To disseminate information about apprenticeship programs:	Washington State legislature provided funds to the Apprenticeship and Training Council to promote apprenticeship to high school students and educators in 2006.		
To develop and provide pre-apprenticeship or preparatory training designed to provide related work experience to prepare candidates for Registered Apprenticeship.	The District of Columbia provides \$1.2 million to support pre-apprenticeship programs with General Revenue funds to apprenticeship sponsors. Upon completion, sponsors have agreed to take students who complete the program.		

Attachment C Contact Information for Cited Programs

Alaska: John Hakala (federal), State Apprenticeship Director, 907/271-5035, Hakala.john@dol.gov; Mike Shiffer, Assistant Director, Division of Business Partnerships, Alaska Department of Labor and Workforce Development, 907/269-3729, mike_shiffer@labor.state.ak.us

California: Long Beach WIB: Patty Garcia (federal), Acting State Apprenticeship Director, 415/975-4007, Garcia.patricia@dol.gov; Glen Forman, Division of Apprenticeship Standards Department of Industrial Relations, GForman@dir.ca.gov, 415/703-4920; George Fernandez Program Coordinator, Center for Working Families, Long Beach CA 90806, 562/570-3728, george_fernandez@longbeach.gov

District of Columbia: Lewis Brown, Director, D.C. Apprenticeship Council, 202/698-5099, lewis.brown@dc.gov; Daryl Hardy, Administrative Officer, Department of Employment Services, 202/698-5146, darylg.hardy@dc.gov

Guam: Alfred Valles (federal) State Apprenticeship Director, 808/541-2519, valles.alfred@dol.gov; Maria Connelley, Director of Labor, 671/565-2237, connent@ite.net

Hawaii: Alfred Valles (federal) State Apprenticeship Director, 808/541-2519, valles.alfred@dol.gov; Elaine Young, Administrator, Workforce Development Division, Department of Labor and Industrial Relations, 808/586-8837, eyoung@dlir.state.hi.us

Kansas: Loretta Shelly, Director, Apprenticeship Program, Kansas Department of Commerce, 785/296-4161, lshelley@kansascommerce.com; Armand Coprology, WIA Program Manager, Kansas Department of Commerce, 785-296-7876, acorpologo@kansascommerce.com

Maryland: Robert Laudeman (federal) State Apprenticeship Director, 410/962-2676, Laudeman.robert@dol.gov; David Ghee, (state) Maryland Apprenticeship & Training Program Division of Workforce Development, 410/767-2246, www.dllr.state.md.us

Missouri: Neil Perry (federal), Apprenticeship Director, 314/539-2522, perry.neil@dol.gov; Janeen Osborne, Workforce Development Specialist, Division of Workforce Development 573/526-8260, janeen.osborne@ded.mo.gov

Pennsylvania: Thomas Bydlon (federal), Apprenticeship Director, 717/221-3496, Bydlon.thomas@dol.gov; A. Robert Rascaliti, (state) Director Bureau of Labor Law Compliance, PA Department of Labor and Industry, 800/932-0665, arisaliti@state.pa.us

Ohio: Mary Ann Dayspring (federal) Apprenticeship Director, 614/469-7375, Dayspring.MaryAnn@dol.gov; Jean Sickles (state) Director, Ohio State Apprenticeship Council, 614/644-2242, SICKLJ@odjfs.state.oh.us; Julie McKay, program specialist, Ohio Department of Job & Family Services, 614/466-9692, MCKAYJ@odjfs.state.oh.us

Oregon: Anne Wetmore (federal), Apprenticeship Director, 206/553-0076, Wetmore.anne@dol.gov; Stephen Simms, Director, Apprenticeship and Training Division, Oregon State Bureau of Labor and Industries, 503/731-4891, steve.simms@state.or.us; match Skills: David Allen, 503/526-2774, david.k.allen@state.or.us

South Dakota: Don Reese (federal), Apprenticeship Director, 605/330-2566, Reese.Donald@dol.gov;

Texas: Dennis Goodson (federal) Apprenticeship Director, 512/916-5435, Goodson.Dennis@dol.gov; Desiree Holmes, 512/936-3059, Desi.Holmes@twc.state.tx.us

West Virginia: Kenneth Milnes (federal), Apprenticeship Director, 304/347-5794, milnes.kenneth@dol.gov

Washington State: Anne Wetmore (federal), Apprenticeship Director, 206/553-0076, Wetmore.anne@dol.gov; Elizabeth Smith, Apprenticeship Program Manager, Department of Labor and Industries, 360/902-5320, smel235@lni.wa.gov; Jamie Krause, WA State Workforce Training Coordinating Board, 360-753-5660, jkrause@wtb.wa.gov

Attachment D

Informational Tools & Resources to Support Development of New Registered Apprenticeship Opportunities and Models

Informational Materials available through Office of Apprenticeship Web site
http://www.doleta.gov/OA/eta_default.cfm

General Information Brochures

- For Employers - Registered Apprenticeship - Building a Skilled Workforce in the 21st Century
(http://www.doleta.gov/oa/brochure/building_skilled_workforce.pdf)
- For General population: High Wage, High Skill - Career Opportunities in the 21st Century
(http://www.doleta.gov/oa/brochure/high_wage_high_skill_careers.pdf)

Industry Facts Sheets provide explanations of Registered Apprenticeship in various industries (<http://www.doleta.gov/oa/e-tools2.cfm#factsheets>)

Setting Up an Apprenticeship Program presents information about how to start a program and provides a link to local apprenticeship staff who can offer free technical assistance. (<http://www.doleta.gov/OA/setprgm.cfm>)

Bulletins/Circulars of High Growth Occupations - Announcements and information about new apprenticeship programs and apprenticeable occupations (<http://www.doleta.gov/oa/whatsnew.cfm>)

Demand-Driven Case Studies - "Registered Apprenticeship Trends in Six Industries" (<http://www.doleta.gov/oa/e-tools.cfm#brochures>)

- Advanced Manufacturing
- Geospatial Technology
- Health Care
- Information Technology
- Maritime
- Military

Contact Information

- Office of Apprenticeship, State Offices
(<http://www.doleta.gov/oa/stateoffices.cfm>)
- State Apprenticeship Agencies
(<http://www.doleta.gov/oa/stateagencies.cfm>)
- Office of Apprenticeship Regional Offices
(<http://www.doleta.gov/oa/regdirlist.cfm>)
- Office of Apprenticeship, National Office
(<http://www.doleta.gov/oa/national.cfm>)

Related Information

WIRED Web site - The WIRED Web site is a comprehensive online resource for the WIRED initiative. The Web site houses information about the initiative, a fact sheet, and a description of the Road to WIRED. The WIRED resource library provides resources to communicate the concepts and ideas of economic transformation and the WIRED Initiative and offers a suggested reading list. The "WIRED Regions" page shows the map of WIRED Regions, a one-page description of the regional projects, and each region's working implementation plan. This tool is available on-line at:
<http://www.doleta.gov/wired/>

Careervoyages.gov - This joint Departments of Labor and Education Web site focused particularly on young people and career changers includes useful apprenticeship information by industry (<http://www.careervoyages.gov/apprenticeship-main.cfm>). Contact information for Registered Apprenticeship program sponsors can be found through a search locator on each industry's web page.

InDemand Magazine - This resource from the Employment and Training Administration is for students, guidance counselors, and parents to provide information on careers in high-growth industries, including those in science, technology, engineering, and math. This magazine is available at:
www.careervoyages.gov/indemandmagazine-stem.cfm

YouthBuild Guide to Expanding Opportunities with Trade Unions - This manual developed by YouthBuild U.S.A provides information for local interactions between YouthBuild programs and skilled trades labor management organizations. The manual is available on-line at:

<http://www.youthbuild.org/site/c.htlRl3PIKoG/b.1360529/apps/s/content.asp?ct=1974993>