



## **BUILDING A CAREER EDUCATION SYSTEM THAT PROVIDES ALL CALIFORNIA STUDENTS WITH THE FREEDOM TO SUCCEED**

### **Policy Recommendations in Response to Governor Newsom's Executive Order of August 31, 2023**

**Submitted by The California Workforce Association in partnership with:**

- CareerWise
- The Southern California Apprenticeship Network (SCAN)
- The Northern California Apprentice Network (NCAN)
- The LAUNCH Network

**Further endorsed by:**

The Partnership to Advance Youth Apprenticeship (PAYA)  
Silicon Valley Leadership Group (SVLG)  
Bay Area Council (BAC)  
Los Angeles Area Chamber of Commerce  
Los Angeles Regional Consortium (LARC)  
Early Care & Education Pathways to Success (ECEPTS)  
CEO Leadership Alliance Orange County (CLAOC)  
Opportunity@Work  
UnidosUS  
Creating Coding Careers  
Code Rising

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## INTRODUCTION

On August 31, 2023, Governor Newsom released the [Executive Order “Freedom to Succeed”](#) which “directs state leaders in education, workforce development, and economic development to develop a Master Plan on Career Education which will guide the state in its efforts to strengthen career pathways, prioritize hands-on learning and real-life skills, and advance universal access and affordability for all Californians through streamlined collaboration and partnership across government and the private sector.”

The following principles and policy recommendations cover the issues identified in the Executive Order and describe how embedding modern college-connected youth apprenticeship as part of a continuum of work-based learning in California will help improve educational equity while helping California maintain its edge as an innovation economy.

The recommendations have been informed by policy input from experts on youth apprenticeship including New America’s Partnership on Youth Apprenticeship (PAYA), JFF’s Center on Apprenticeship and Work-Based Learning, the Brookings Institution, the American Institutes for Research (AIR) Apprenticeship Expansion Projects, the National Governors Association, the European Center on the Economics and Management of Education and Training Systems (CEMETS) as well as practitioners represented by the signatories of this document.

This framework builds on other relevant statewide guidance documents such as the [CA State Plan for CTE](#), the [CA Governor’s & CCCCCO Road Map to Success](#), the [Workforce Pathways Guiding Policy Principles](#) from the California Workforce Pathways Joint Advisory Committee, as well as the [Strong Workforce Taskforce Report & Recommendations](#), among others.

The recommendations have been further informed by the deliberations of the California Youth Apprenticeship Committee (CYAC), the advisory body to the Division of Apprenticeship Standards that was created by CA Assembly Bill 178. AB 178 mandated the development of an implementation plan for Youth Apprenticeship in California by June 2024. Over the last nine months, the committee reviewed presentations of youth apprenticeship systems in the US and around the world.



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## BACKGROUND

Students in California have been told for decades that only a straight path to college would set them up for success. The wage premium for those with a college degree seems to convey the same message. And yet, fewer than half of California's 9<sup>th</sup> graders make it to college within 6 years and even fewer graduate with a degree of any kind. Clearly the college-for-all strategy has created significant equity gaps and left many young Californians behind, especially those from socioeconomically disadvantaged communities and special populations. Many students graduate high school neither college nor career ready. That is one reason why many Californians, even when the



economy is performing at its best, have a difficult time finding their way into a family-sustaining career. Concurrently, employers are challenged with finding workers that are prepared for the workforce. This is—at least in part—because public education systems are unable to keep up with needs of a rapidly changing economy and address the skills of a future workplace. It is also the result of the disconnect between education and workforce development which leaves many young people with a lack of knowledge about contemporary jobs and the education and training they require.

However, when trainees alternate between the workplace and the classroom, the future becomes the present—the uncertainty of prediction disappears. This is the essence of the **modern college-connected youth apprenticeship**, a talent development strategy that can solve the modern paradox of the mismatch between educational pathways and workplace needs. Solving this paradox would

also help reduce California’s societal inequities by nurturing talent everywhere—an especially promising prospect for young people in California.

Modern youth apprenticeship addresses several additional problems:

#### **For society . . .**

- Lower unemployment rates among youth, especially opportunity youth.<sup>1</sup>
- Economic stimulation of having more early earners, which injects hundreds of billions of dollars into an economy the size of California’s.
- Local and regional talent pipelines, facilitating homegrown talent for local communities.
- Global competitiveness for an innovation economy whose lifeblood is talent.

#### **For youth . . .**

- A multitude of debt-free pathways to skilled employment.
- A positive return for apprentices who out-earn their peers by more than \$300,000 over the course of their careers.<sup>2</sup>
- A shortened training-to-career time.<sup>3</sup>
- Educational equity for a wider range of learning styles.

#### **For employers . . .**

- A flexible approach as useful in small businesses as in a multinational corporation.
- Opportunity to provide input into curriculum and ensure learning is career-relevant and current.
- A positive return on investment.<sup>4</sup>
- An opportunity to help produce rather than just consume (and compete for the same) talent.

#### **For educators . . .**

- Highly permeable connections between apprenticeship and academic paths, preserving options for further education.

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<sup>1</sup> “Switzerland ranks highly in youth employment survey,” *SWI*, October 19, 2017, <https://www.swissinfo.ch/eng/business/kof-study-switzerland-ranks-highly-in-youth-employment-survey/43611872>.

<sup>2</sup> Debbie Reed et al., *An Effectiveness Assessment and Cost-Benefit Analysis of Registered Apprenticeship in 10 States* (Oakland: Mathematica Policy Research, 2012), <https://bit.ly/2Alvg6b>; Graduates of Registered Apprenticeship programs earn an estimated \$301,533 more than their peers over their careers, including wages and benefits.

<sup>3</sup> Thomas Bolli, Maria Esther Egg, and Ladina Rageth, *Meet the need—The role of vocational education and training for the youth labour market* (Zurich: KOF Swiss Economic Institute, 2017), [https://www.dcdualvet.org/wp-content/uploads/2017\\_ETH\\_KOF\\_meet-the-need-the-role-of-VET-for-youth-labour-market.pdf](https://www.dcdualvet.org/wp-content/uploads/2017_ETH_KOF_meet-the-need-the-role-of-VET-for-youth-labour-market.pdf).

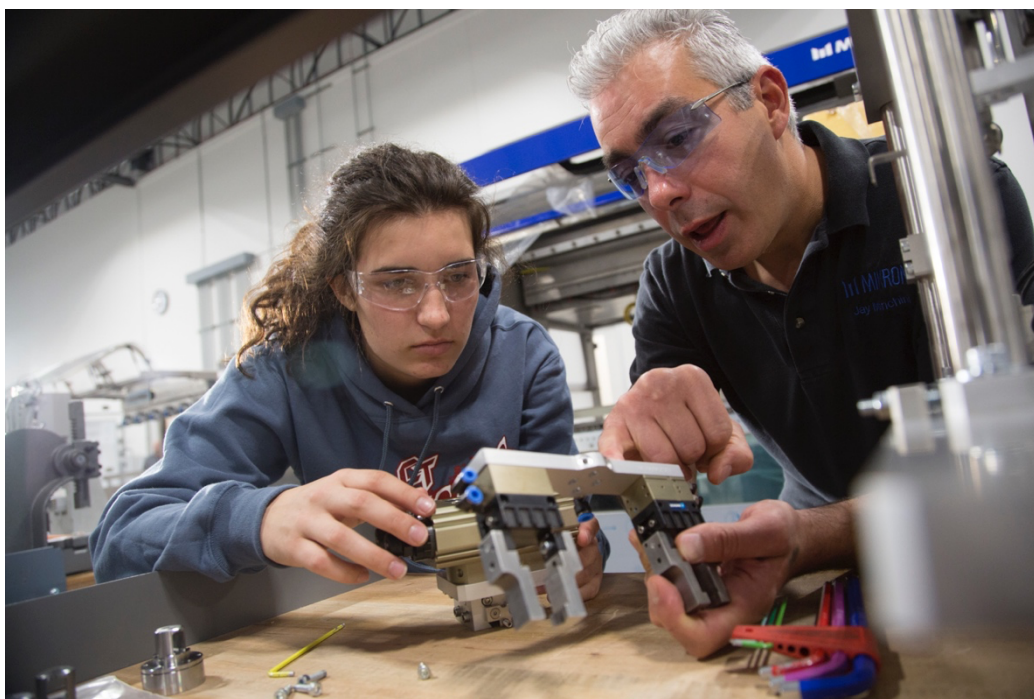
<sup>4</sup> Unfortunately, so far only two countries (Germany and Switzerland) provide representative and periodic data on the costs and benefits of apprenticeship training that are suitable for such an analysis; Samuel Muehleemann and Stefan C. Wolter, “Return on investment of apprenticeship systems for enterprises: Evidence from cost-benefit analyses,” *IZA Journal of Labor Policy* 3, no. 25 (November 2014), <https://bit.ly/2PMF2Dt>. However, for a more limited US analysis see 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*. Report prepared for U.S. Department of Labor, Employment and Training Administration. Rockville, MD: Abt Associates; and Washington, DC: Urban Institute. [https://www.dol.gov/sites/dolgov/files/ETA/publications/ETAOP2022-36\\_AAI\\_ROI\\_Final\\_Report\\_508\\_9-2022.pdf](https://www.dol.gov/sites/dolgov/files/ETA/publications/ETAOP2022-36_AAI_ROI_Final_Report_508_9-2022.pdf)



- More motivated learners, fewer dropouts, and a more contextualized learning environment for everyone.<sup>5</sup>
- More focused instructional time for educators without the burden of re-creating the world of work inside the classroom.

California, with less than half of one percent of its workforce in apprenticeships, lags behind global apprenticeship powerhouses, such as Germany and Switzerland where five percent of their workforces and 50 to 70% of their youth in education are apprentices.<sup>6</sup> As a result, the majority of youth in California encounter an obstacle course in their path from school to work, a pattern that reinforces racial and generational wealth gaps. And, many high-quality jobs remain unfilled, which is a drag on productivity, innovation, and regional prosperity.

If California successfully scaled youth apprenticeship, estimates suggest that the California economy could absorb at least 650,000 apprentices, or eight times the number that are currently being trained.<sup>7</sup> The resulting \$300,000 increase in lifetime earnings per apprentice amounts to an injection of \$195 billion into the state's economy.




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<sup>5</sup> Russell W. Rumberger et al., *Preventing Dropout in Secondary Schools* (Washington, DC: What Works Clearinghouse, 2017), [https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/wwc\\_dropout\\_092617.pdf](https://ies.ed.gov/ncee/wwc/Docs/PracticeGuide/wwc_dropout_092617.pdf).

<sup>6</sup> California in the summer of 2018 had 84,000 apprentices in a civilian workforce of just over 19 million. See: “California,” *Economy at a Glance*, US Department of Labor Bureau of Labor Statistics, n.d., <https://www.bls.gov/eag/eag.ca.htm>.

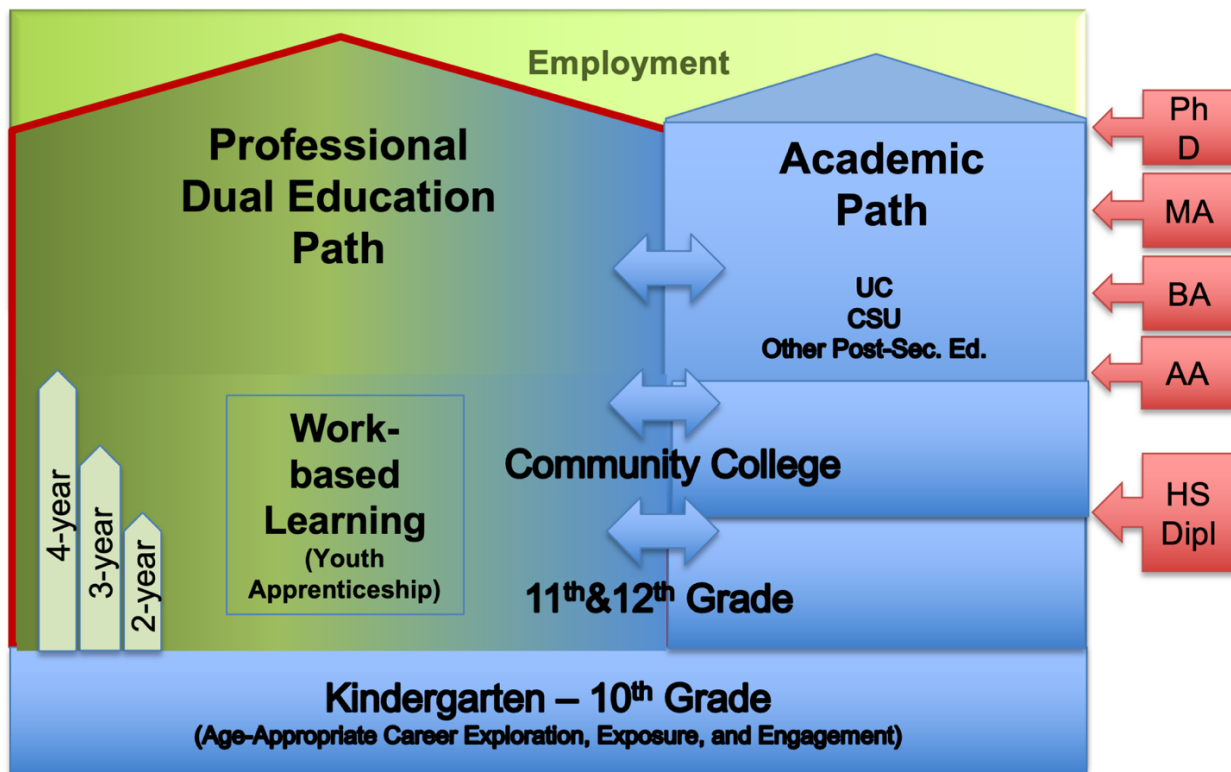
<sup>7</sup> Joseph B. Fuller and Matthew Sigelman, *Room to Grow: Identifying New Frontiers for Apprenticeships* (Boston: Harvard Business School; Boston: Burning Glass Technologies, 2017), <https://www.hbs.edu/managing-the-future-of-work/Documents/room-to-grow.pdf>.

# THE VISION: A CAREER EDUCATION MODEL FOR ALL CALIFORNIANS

To equitably achieve the outcomes outlined above, the proposed California Career Education (CE) model embeds the modern youth apprenticeship in a continuum of work-based learning activities that start in middle school and extend through high school graduation and beyond. This approach will allow students to participate in a progressive series of activities from career exploration, exposure, and engagement to the final stage of career experience through an apprenticeship that allows them to earn credits towards graduation while gaining paid experience in the workplace in a career track of their choice.

The proposed dual education pathway that blends work-based learning and paid on-the-job training with classroom instruction offers students an educational model that is more robust and relevant than the traditional academic-only path. The career-focused alternative offers hands-on learning experience, job-specific credentialing, and allows students to make informed decisions about their future. Using this method, California schools can offer educational pathways that allow students to easily switch between academic and career-focused paths at any level and receive credit for what they already know rather than having to retake courses.

## CALIFORNIA'S CAREER EDUCATION MODEL



The proposed California Career Education Model illustration lays out the various school-based and work-based education components of the system. Beginning in eleventh grade, students can elect to begin the single path of pure academics or the dual path that combines work-based learning with classroom-based instruction. The dual path maintains the school-based education (shown in blue) and adds a paid two-, three-, or four-year on-the-job training component (shown in green, denoting



training-wage levels) through modern youth apprenticeships that can begin in high school and continue in post-secondary. Career Technical Education (CTE) pathways can easily align curriculum with apprenticeship and offer preapprenticeship learning beginning in tenth grade. Youth apprenticeship can build on CTE programs and grant students credit for prior learning and experience, can be implemented easily through high school Work Experience Education Programs, and in cases where high schools and community colleges align, can provide students with early college credit.

In this dual model, employers are not responsible for academic instruction and educators do not train students for employment. Instead, learners take from each environment what it does best. This approach also helps teachers answer students' questions: Why do we have to learn this? It demonstrates the connection between academic and hands-on learning with a focus on both college and career readiness.

Young people on either the single or dual path can first enter full employment (shown in a dark green color, denoting full-wage levels) right after either 12<sup>th</sup> grade or completion of the two-year modern youth apprenticeship. Students who complete the pure academic path and students who complete the modern youth apprenticeship model will receive the same high school diploma, but generally speaking, the apprenticeship graduate would have more workplace experience and would earn a higher wage at a younger age.

However, both paths offer opportunities to delay full employment and earn advanced degrees and/or credentials. For example, youth on the dual path can earn the equivalent of an associate degree within just one year of graduating from high school. If, at any point, youth on the single path choose to try the dual path or vice versa, they can easily switch (denoted by the arrows between the paths) and pursue a more work-based or school-based education and credential.

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## KEY PRINCIPLES OF A CALIFORNIA CAREER-CONNECTED EDUCATION SYSTEM

We recommend that the California Career Connected Education System should adhere to the following principles: (adapted from the [PAYA Principles for Quality Youth Apprenticeship](#))

- **Career-oriented:** Learning is structured around knowledge, skills, and competencies that lead to careers with family-supporting wages.
- **Equitable:** Learning is accessible to every student, in multiple paths that best suit their learning styles and needs and with targeted supports for those adversely impacted by long-standing inequities in our education system and labor market.
- **Portable:** Learning leads to postsecondary credentials and transferable college credit that expand options for students.
- **Adaptable:** Learning is designed collaboratively to be recognized and valued across an industry or sector.
- **Accountable:** Student, employer, and program outcomes are monitored using transparent metrics to support high quality programs and continuous improvement.
- **Holistic:** Programs recognize the importance of life management to academic and career success and incorporate support systems as well as activities designed to cultivate social-emotional growth.

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# POLICY RECOMMENDATIONS TOWARD IMPLEMENTATION

This section contains a set of recommendations to implement relevant new policy through legislation or administrative action to implement the California Career Education Model outlined above. These policy recommendations are follow the eight-element structure adapted from the [NGA Playbook on Youth Apprenticeship](#).

1. **Establish a statewide vision and definitions** for all elements of the work-based learning continuum, including preapprenticeships, internships, and youth apprenticeship;
2. **Establish a streamlined statewide governance structure** for work-based learning and youth apprenticeship;
3. **Champion youth apprenticeship** and other forms of work-based learning through consistent and targeted community outreach and employer engagement;
4. **Improve systems alignment** across K-12 education, postsecondary education and workforce development to support greater access to opportunity, improved career readiness and more equitable career outcomes among high school graduates;
5. **Use data to inform program creation, implementation and accountability** for continuous improvement in outcomes for students and employers;
6. **Clarify the employer roles and responsibilities** in work-based learning and youth apprenticeship programs, and;
7. **Reduce logistical, regulatory, and financial barriers** to employer participation and streamline administrative requirements for employers across funding streams that are leveraged for dual education
8. **Leverage existing resources and identify new funding incentives** for youth apprenticeship program development, growth, and sustainability.





## Element 1: Establish a Statewide Vision and Definitions

### **Recommendation 1.1: Establish a Vision**

To develop a coherent vision for a learner-centric and employer-driven career education system that follows the principles outlined above and meets all the criteria contained in this policy framework, we recommend that the Governor’s Career Education Council consult with a robust employer advisory panel comprising a representative sample of public and private employers across California’s priority industry sectors. In addition, we recommend that the draft definition be circulated to relevant governance and advisory committees such as the Board of Education, CYAC, IACA and others.

**Recommendation 1.2: Commit to consistent definitions across agencies and stakeholders for critical elements of the system:** Develop definitions for the complete continuum of learner-centric and employer-driven work-based learning activities from K-16. We recommend that such definitions are agreed upon and published on the California Department of Education (CDE) and Community College Chancellors Office (CCCO) websites, follow international best practices, including, for example, OECD guidelines for dual education that stipulates that at least 25% of the curriculum is delivered in the workplace.

## Element 2: Establish a statewide governance and support structure for work-based learning and Youth Apprenticeship

### **Recommendation 2.1: Establish an administrative entity that provides oversight over the CA Youth Apprenticeship System.**

Effective operation of a Career-Connected Learning and Youth Apprenticeship System for California requires a level of interagency cooperation and interoperability among its core stakeholders, as if the system was managed by a single entity. Unless the core stakeholders agree to delegate leadership and management to one of the four agencies, we recommend that this function be co-managed under a memorandum of understanding (MOU) and using an interagency steering committee with shared responsibilities of the California Department of Education, the California Department of Labor, and the California Community College system and Go-Biz as core members. Under this approach, steering committee members from each agency, with expertise in the subjects of education and workforce development, will contribute their core competencies and associated funding to operate and manage the system as a whole. In addition, we recommend that:

- Staffing levels will allow each stakeholder agency to contribute toward the re-engineering of relevant processes, such as career navigation and guidance, pathway development and approval, as well as shared data systems.
- Staffing levels will also allow to maintain system infrastructure that is agency specific as well as staffing the shared steering committee and other shared functions.

### **Recommendation 2.2: Establish statewide industry intermediary structure for apprenticeable occupations to:**

1. Establish and grow career pathways and develop and propose occupational competency frameworks for each career pathway that is determined to be apprenticeable by employers and approved by the Division of Apprenticeship Standards. Once a pathway and associated

occupational competency frameworks have been approved, Local Educational Agencies (LEAs) are then able to sign on local employers so that they jointly can provide high school modern youth apprenticeships in the pathway anywhere in CA.

2. Align Model Curriculum Frameworks and Standards for K-14 CTE/CE programs with occupation-specific competencies. The Model Curriculum Frameworks and Standards should be updated at least every five years (or more frequently if there is a need). Reviews are led by industry-specific advisory groups in collaboration with Department of Industrial Relations (DIR), CDE, and CCCO and do not require State Board of Education approval since they will function as a resource for both high school and community college CTE/CE programs.
3. Develop and manage the process to assess skill attainment to award credentials, including journeyworker certificate, and credit toward diplomas and degrees.

**Recommendation 2.3: Align The Career Education Master Plan with other planning instruments, including guidance to ensure that High school Youth Apprenticeship is included in all of California's Regional and Local Plans for Workforce Development Boards.**

**Recommendation 2.4: Establish a statewide structure of regional intermediaries.**

Aligned with the regional planning structure established under 2.4, develop and fund a regional intermediary structure (like the current example of the LAUNCH Network) to expand and promote apprenticeships in non-traditional occupations. If no regional infrastructure exists yet, the State will authorize local entities to act as intermediaries and grant recipients. Once fully implemented, the regional intermediary structure will become the primary vehicle for funding of apprenticeship expansion projects.

## **Element 3: Champion Career-Connected Learning and College-Connected Youth Apprenticeship**

**Recommendation 3.1: Prepare a comprehensive Career-Connected Learning and College-Connected Youth Apprenticeship Resource Playbook**

We propose that the governor commission a playbook that contains a full slate of training materials to demonstrate the value of all aspects on the continuum of work-based learning from career exploration, exposure, and engagement, experience apprenticeship, and applied degrees at K-12 and CCCs.

**Recommendation 3.2: Convene Annual regional and/or State summits:**

The signatories are offering to work with the governor and the lead agencies, professional associations, such as California Community College Association for Occupational Education, the California Education Diversity and Growth in the Economy (EDGE) Coalition, Association for Career Technical Education, as well as industry groups, such as the Northern and Southern California Apprenticeship Network (NCAN/SCAN) to promote awareness of career options and youth apprenticeship





pathways to youth, their parents, educators, employers, organized labor, career counselors through annual regional and state summits on Career Connected Learning and Youth Apprenticeship.

**Recommendation 3.3: Conduct market research with potential apprentices, their parents, and employers to test messaging and branding strategies and launch a peer-to-peer campaign among public and private sector employers as well as a public campaign targeting youth and their parents.**

Using findings, prepare an outreach, awareness, communications, and public engagement plan to counteract misperceptions about apprenticeship; inform potential participants and their parents about currently available opportunities and how they can be leveraged to make informed career and education choices. Prepare branded presentations, and collateral. Promote and incent apprenticeship intermediaries such as colleges, workforce boards, industry associations, community-based organizations, unions, and others who can work with employers and other stakeholders to expand the use of apprenticeships.

#### **Element 4: Improve systems alignment across K-12 Education, Postsecondary Education, and Workforce Development Agencies and planning processes**

**Recommendation 4.1: Provide a sequence of work-based learning opportunities leading to apprenticeship, that includes field trips, job shadowing, and internships.**

Industry-connected work-based learning should be embedded as an instructional strategy in all CTE/CE programs, and the on-the-job training required in apprenticeship can occur through Work Experience Education (WEE) programs in high schools. Viable examples that CA could borrow from can be found in Indiana, Pennsylvania, and Washington.

**Recommendation 4.2: Integrate these work-based learning opportunities during secondary and postsecondary education with full permeability between single academic and dual work-based learning pathways.**

To that end, we recommend that, in addition to awarding academic credit for work-based learning through CTE and WEE programs, high schools and community colleges should align and articulate programs so students can earn early college credit whenever possible. This could result in completion of a career-connected learning pathways through an apprenticeship lead to an applied associate degree, whenever possible.

**Recommendation 4.3: Offer dual enrollment wherever appropriate with commensurate community college credit for high school apprentices.**

When high school students wish to dual enroll in appropriate CTE programs, they should be allowed to enroll in the course, whether it is offered online, by any neighboring community college, or other designated RAP training provider or intermediary. Currently there are restrictions in high school student access to courses offered by community colleges outside of their specified district or region.

**Recommendation 4.4: Improve and expand career information and advising.**

We recommend that school districts be provided with sufficient staffing resources and professional development time so that school career counseling staff can provide up-to-date information and advice on all available dual and academic pathways and master schedules can create dual program options for students. We further recommend bolstering programs such as California Student Opportunity and Access Program (CAL-SOAP) which focus on serving low income, first-

generation students (funded and managed through California Student Aid Commission) and encouraging local education agencies and schools to collaborate with workforce boards (through their job centers), unions, chambers of commerce and relevant Community Based Organizations.

**Recommendation 4.5: Align CTE Pathway/Sector with CDE and CCCO.**

We recommend that CDE and CCCO work collaboratively to create an aligned industry sector and pathway model for CTE and CE. This will allow for seamless articulation of programs and create alignment of K-14 systems. Industry Sector names and pathways should be informed by student enrollment data in CTE sectors in K-12 provided by CDE, prioritizing the sectors with the highest enrollment numbers to account for student interest. The sector alignment and naming protocol should consider other factors such as workforce and economic priorities for the governor’s office, DIR, California Workforce Development Board. This sector and pathway alignment should precede the development of K-14 Model Curriculum Frameworks and Standards for K-14 CTE/CE programs and be led by industry-specific advisory groups in collaboration with CDE and CCCO.

**Element 5: Use data to inform program creation, implementation and accountability.**

**Recommendation 5.1: Incorporate CA Dual Education Model data points into the statewide Cradle to Career (C2C) Data System to allow for longitudinal tracking of outcomes and for cross-system benchmarks.**

Ensure that career connected learning and youth apprenticeship data and information are aligned and compatible with the state’s existing investments in data transparency and career navigation, in particular the State Office of Cradle to Career’s investments in building a linked analytical dataset that connects existing state-level data on education and job outcomes to allow young people and families to make informed decisions about work and learning.

**Recommendation 5.2: Link data across agencies to harmonize outcomes data -- adopt enhanced wage records reporting including occupation.**

Improve occupational coding and data collection, especially for newer occupations so that labor market information accurately tells the story of CA Industries. (Workforce data across technology and entertainment sectors are often not represented correctly in our labor market information systems due to outdated code sets and emerging occupations)

**Recommendation 5.3: Establish and fund on an ongoing basis a research plan and data infrastructure.**

This plan is designed to set a baseline for tracking progress, outcomes, impacts, and continuous improvement over time.

- Among the baseline studies, set up a California Employment Education Linkage Index and a California Youth Labor Market Index to be able to show improvements over time that result from implementing a modern youth apprenticeship system. Similarly, collect data on return on investment for employers and for apprentices based on established metrics.
- Measure deployment and investment across regions and schools within regions, adjusted for current school funding formulas, potentially including private/nonprofit intermediaries.

- Also track outcomes across a wide range of populations as part of the accountability metrics and calling for regularly addressing disparities in outcomes that reflect gaps in access.



## **Element 6: Reduce logistical, regulatory and financial barriers to employer participation.**

### **Recommendation 6.1: Streamline and simplify the program registration process for High School Based Youth Apprenticeship:**

- Build efficiency by leveraging common industry needs and creating a streamlined approval process based on an industry occupation and pathway quality framework that provides a consistent set of competencies. Any employer and education partnership pursuing these occupations would be automatically approved by submitting aligned course outlines and MOUS. Certificates of completion are awarded upon successful proof of competency attainment, either by performance assessment, industry credential attainment, portfolio review or other appropriate method as determined by the education institutions and industry intermediaries as described in Section 2.2.
- Create an open, searchable, regularly updated and maintained public list/database of all approved pathways and intermediaries by region so schools, students, parents, and employers have easy access.
- Leverage industry intermediaries for needed input simultaneously across institutions including but not limited to secondary schools, community colleges, and American Job Centers of California to avoid duplicative asks of employers and ensure consistent data across systems.
- Create simple online tools that help employers, and their training partners build productive apprenticeships and provide live technical assistance through regional and industry intermediaries.

### **Recommendation 6.2: Where appropriate, offer financial incentives to employers and intermediaries, and organized labor that train apprentices.**

- Conduct a study (nationally and abroad) and implement the most impactful financial mechanisms to increase employer engagement and adoption of apprenticeship and/or reduce employer cost including but not limited to:
  - Tax credits



- Reimbursements
- Up front incentives with completion bonuses
- Training levees

**Recommendation 6.3: Adequately staff administrative entities.**

- Apprentices and employers must not be delayed due to a lack of capacity by any agency or public stakeholder in the approval or processing of registered high school youth apprenticeships nor in the awarding of completion certificates.
- Employers new to apprenticeship must have access to readily available technical assistance from state and local agencies, education providers, nonprofits, regional and industry intermediaries.

**Element 7: Revise laws, regulations, and policies**

**Recommendation 7.1: Draft legislation or administrative policy as necessary to address recommendations under elements 1-6 and 8 and conduct annual policy review to determine need for updates.**

Among the known needed legislative changes:

- Amend AB 130 to eliminate the current onerous fingerprinting requirement in workplaces that host minors.
- Add language to Education Code to specify “regional and state workforce priorities” for CTE funding across CDE and CCCO to allow for rural communities to access training for high tech jobs that may allow for remote/virtual work and support the state economy.
- Establish and codify high school apprenticeship and workforce training pilot program grants as a subset of CTE Incentive funding with CDE.
- Identify/Evaluate CA. Labor Code § 3100 pertaining to preapprenticeship that states work based learning should be voluntary.
- Identify/Evaluate child labor laws that create barriers for companies to hire 16- to 18-year-olds in youth apprenticeships.

**Element 8: Sustain targeted state funding**

**Recommendation 8.1: Provide reliable formula funding, building on the current model (like RSI, FTE and the Apprenticeship Innovation Fund). Enhance with grants for expansion, development and demonstration purposes.**

**Recommendation 8.2: Secure sustainable financing for secondary and postsecondary instruction. Building on the recent budget trailer bill, policymakers should also assess whether similar enabling legislation is needed at the secondary school level.**

**Recommendation 8.3: Institutionalize a funding model for intermediaries that takes into consideration their key role of engaging employers to start taking on apprentices as well as start and manage apprenticeship programs in non-traditional sectors and occupations.**

**For more information contact:**

Bob Lanter – [blanter@calworkforce.org](mailto:blanter@calworkforce.org) – 916-806-1228

Vinz Koller – [Vinz\\_Koller@spra.com](mailto:Vinz_Koller@spra.com) – 831-277-4726

California Workforce Association – 925 Del Paso Blvd, Sacramento, CA 95815