

# Wisconsin Youth Apprenticeship Manual

## Regulations, Policies and Procedures



# Wisconsin Youth Apprenticeship Manual

## **State of Wisconsin**

Department of Workforce Development  
Division of Employment and Training  
Bureau of Apprenticeship Standards

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# Wisconsin Youth Apprenticeship Manual

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# Definitions

**Academic and Career Planning (ACP)** The common name of the statutory requirement that school boards in Wisconsin, as of September 2017, provide access to an education for employment program approved by the state superintendent in which academic and career planning services are provided to pupils in grades 6 to 12.

**Articulation** The process of comparing the content of courses that are transferred between secondary and postsecondary institutions such as technical college or universities. There are two types of articulation: Advanced Standing (AS) and Transcribed Credit (TC) options.

**Advanced Standing (AS)** Also referred to as "credit in escrow" because the application of the credit is delayed until students enroll in a technical college program. This type of credit could be applied in several different ways, such as electives or as portions of a class.

**At-Risk** A statutory classification and definition of students in grades 5 to 12 who are at risk of not graduating from high school because they have dropped out of school or because other criteria are met. These other criteria and the full definition is available at:

<http://docs.legis.wisconsin.gov/statutes/statutes/118/153>.

**Bureau of Apprenticeship Standards (BAS)** The Bureau within the Wisconsin Department of Workforce Development's Division of Employment and Training which oversees the Youth and Registered Apprenticeship Programs.

**Business Objects (SAP BusinessObjects)** A software suite used to provide analytical and ad hoc reporting to businesses. The Department of Workforce Development uses the Web Intelligence or WebI software platform to create and run reports on youth apprenticeship data. Consortia approved to offer the Wisconsin Youth Apprenticeship Program typically have authorization to use Business Objects to run reports on their data. The terms Business Intelligence/BI or Web Intelligence/WebI are sometimes also used to refer to the Business Objects software.

**Certificate of Occupational Proficiency** (also known as YA Certificate) The credential earned by a youth apprentice upon completion of the apprenticeship and which is issued by the Wisconsin Department of Workforce Development. The Certificate includes note of whether the apprenticeship was for one or two years as well as the apprentice's occupational area.

**COMET (Contract Management and Expenditure Tracking)** The web-based financial system through which youth apprenticeship consortia who are grant recipients submit expenditure reports to be reimbursed for allowable expenses.

**Credit for Prior Learning** Credit provided by Wisconsin technical colleges for work completed through nationally or regionally accredited post-secondary institutions or other education, training, or work experiences pertinent to the student's new educational programming and the technical college's graduation requirements.

**Youth Apprenticeship Consortium** A group offering the Wisconsin Youth Apprenticeship Program locally and which is comprised of one or more school districts or one or more school districts and other education and workforce development-interested organizations, such as technical colleges, workforce development boards, employers and others. Consortia must apply to the Department of Workforce Development annually to offer the Wisconsin Youth Apprenticeship Program and to access grants funds, when available, to offset some of the costs of providing the program.

**Department of Workforce Development (DWD)** The Wisconsin state agency statutorily authorized to provide youth and registered apprenticeship programs in the state.

**Education/Training Agreement (ETA)** A document signed by the youth apprentice, his or her parent or guardian, the employer, the high school principal and the YA coordinator and which includes the responsibilities of each party during the youth apprenticeship.

**Level One** A youth apprenticeship consisting of one year of employment (at least 450 hours) and related instruction (at least two semester-long courses) which can be completed during the junior or senior year of high school.

**Level Two** A youth apprenticeship consisting of two years of employment (at least 900 hours) and related instruction (at least four semester-long courses) which takes place during the apprentice's junior and senior years of high school.

**Mentor** A skilled, experienced employee who assists and guides the youth apprentice at the workplace during the apprenticeship.

**Program Area** A group of related occupational areas within an industry, akin to a "career cluster." The Wisconsin Youth Apprenticeship Program includes opportunities in eleven program areas: Agriculture, Food and Natural Resources; Architecture and Construction; Art, A/V Technology and Communications; Finance; Health Science; Hospitality, Lodging and Tourism; Information Technology; Manufacturing; Marketing; Science, Technology, Engineering and Mathematics (STEM), and Transportation, Distribution and Logistics. Each program area then contains several more specific pathways within it from which the apprentice chooses.

**Regional YA Coordinator** The individual chosen by a youth apprenticeship consortium steering committee to provide organizational and logistical support and to be its primary point of contact for the Department of Workforce Development.

**Registered Apprenticeship** One of the two distinct apprenticeship programs, along with the Wisconsin Youth Apprenticeship Program, provided by the Department of Workforce Development. Whereas youth apprentices are generally juniors or seniors in high school, registered apprentices, in most situations, have already attained their high school diploma or its equivalent.

**School-Based Learning (Related Instruction)** The classroom component of the youth apprenticeship experience. Within parameters provided by the Department of Workforce Development, each consortium approves the coursework which relates to the program area and job of the youth apprentice and which counts toward the school-based learning requirements of the program. Related instruction courses can be taken at the high school, a local technical college or through other means approved by each consortium.

**School-Based YA Coordinator** Each high school participating in the Wisconsin Youth Apprenticeship Program (by signing on with one or more YA consortia) identifies an individual in the school as the school-based YA coordinator whose responsibilities include recruitment of students, marketing of the program, support related to determining the related instruction to be taken by a youth apprentice, and more.

**Skill Standards Checklist** The document which includes the skills to be attained by the apprentice by the end of the apprenticeship. The checklist includes skills required of every youth apprentice in that program area as well as skills specific to each pathway within the program area.

**Student Learner** Students registered with the Wisconsin Youth Apprenticeship Program are student learners, a legal classification found in Wis. Admin. Code § DWD 270.14(3)(a). This status allows youth apprentices to engage in some work that would otherwise be disallowed as hazardous if the following conditions are met: the work they perform is under the direct and close supervision of a qualified and experienced person; there is a schedule of organized and progressive work processes to be performed on the job, and the work in question is incidental to the training and is for intermittent and short periods of time.

**Transcribed Credit (TC)** The credit given to a high school student by both their high school and a post-secondary institution who have agreed that the course in question meets the academic requirements of both institutions. Also referred to as "dual enrollment credit."

**Work-Based Learning** The employment portion of the youth apprenticeship experience. 450 hours of work is required for every year of the youth apprenticeship.

**Wisconsin Youth Apprenticeship Program** A state-supported and provided program in which juniors and seniors in high school may complete both school-based learning and work-based learning in a specific occupational area. The Wisconsin Youth Apprenticeship Program is overseen by the Department of Workforce Development and offered locally by state-sanctioned YA consortia.

**YODA (Youth Online Data Application)** The web-based application which is used by youth apprenticeship consortia coordinators to register and enter other data regarding their youth apprentices.

# Chapter 1: Background

## A. History of Youth Apprenticeship in Wisconsin

The nationally recognized Wisconsin Youth Apprenticeship (YA) Program provides high school students with academic and work experiences and skills that lead to both a high school diploma and a Certificate of Occupational Proficiency in a specific career cluster. The Wisconsin YA Program was created by the Wisconsin Legislature in 1991. Incorporated into YA are many elements of the Wisconsin Registered Apprenticeship system, such as recognized, portable certificates and standardized related instruction. Established in 1911 as the first statewide apprenticeship system in the country, registered apprenticeships often require that an applicant already have a high school diploma or its equivalent. There are other differences between the two programs due to the different age ranges and work experience levels of the participants.

Along with technical job skills, youth apprentices gain valuable employability skills, interpersonal skills, and a general knowledge of the world of work. Students who successfully complete the program have many options, including: entering the workforce directly after high school, applying for a registered apprenticeship position and enrolling in a postsecondary educational program, among others. Whatever option, or options, youth apprentices choose, they are better prepared to succeed because of their participation in the program.

From an initial registration of 21 students in the 1992-93 school year, the program has grown to over 5,000 youth apprentices annually. At the Wisconsin Department of Workforce Development (DWD), the YA program and staff are housed within the Division of Employment and Training's Bureau of Apprenticeship Standards.

## B. Program Design and Key Elements

The Wisconsin Youth Apprenticeship Program integrates school-based and work-based learning. The Program, offered and administered locally by regional consortia, includes uniform statewide curriculum guidelines. These guidelines are developed in collaboration with and endorsed by representatives from Wisconsin businesses, industry associations and trade representatives in each program area (described below). Youth apprentices are mentored at their place of employment. They are also simultaneously enrolled in related classroom instruction that both supports meeting their high school graduation requirements and enhances what is being learned in the workplace.

Later chapters include more information on each of these, but in short, the key elements of the Wisconsin Youth Apprenticeship Program are:

- Industry-developed skill standards
- Exposure to multiple aspects of an industry
- Skilled mentors assigned to train the students
- Paid work
- Program curriculum guidelines for all programs
- Related classroom instruction concurrent with work-based learning
- Local program operation within uniform statewide parameters
- Performance evaluation of required skills
- State-issued Certificate of Occupational Proficiency upon completion

The standard two-year youth apprenticeship (Level Two) requires four semesters of apprenticeship-related classroom instruction and a minimum of 900 hours of work-based learning. It traditionally occurs during the student's junior and senior years in high school.



In 1999, several program design variations were introduced to allow more flexibility for students and businesses interested in participating. Chief among these was the introduction of a one-year option (Level One) which could be undertaken during the junior or senior year in high school. A Level One youth apprenticeship requires two semesters of related classroom instruction and at least 450 hours of work-based learning.

Completers of either a one or two-year youth apprenticeship are awarded a state Certificate of Occupational Proficiency signed by the Secretary of the Department of Workforce Development.

All program variations must comply with applicable employment of minors and "student learner" laws. See Chapter 6 for details related to the allowed number of hours worked, age restrictions, prohibited occupations and equipment, and allowed time-of-day employment.

### C. Youth Apprenticeship Occupational Areas

DWD staff work with statewide industry associations to identify appropriate industries for youth apprenticeships. Occupations within those industries are then selected based on their growth potential, wage levels, skill levels of occupations within the industry, availability of entry level jobs with career growth potential, and interest in and commitment to hiring youth apprentices on the part of businesses within the industry. To be added, a new occupational area (also referred to as a "program area") must be approved by the DWD. Regional consortia decide which program areas to offer in their coverage area based on local employer and industry need and availability of related instruction.

YA program areas are diverse and represent many industries. Approved program areas include the following:

- Agriculture, Food and Natural Resources
- Architecture and Construction
- Art, A/V Technology and Communications
- Finance
- Health Science
- Hospitality and Tourism
- Information Technology
- Manufacturing
- Marketing
- Science, Technology, Engineering and Mathematics (STEM)
- Transportation, Distribution and Logistics

For more information on current YA program areas, curriculum guidelines and specific pathways available within each program area, go to: <https://dwd.wisconsin.gov/youthapprenticeship/programs.htm>.

## Chapter 2: Program Oversight and Administration

### A. Role of the Wisconsin Department of Workforce Development

The Wisconsin Department of Workforce Development (DWD) is authorized to provide a Youth Apprenticeship (YA) Program in Wis. Stat. § 106.13. The complete YA program statute is available at: <https://docs.legis.wisconsin.gov/statutes/statutes/106/II/13> and in Appendix A.

The DWD's program oversight responsibilities include, but are not limited to:

- Establishing guidelines and policies for the program
- Working with industry to develop new YA program areas
- Ensuring development of statewide program curricula guidelines
- Reviewing program and grant applications from interested regional consortia
- Managing the expense reimbursement process and distributing YA grant funds
- Monitoring YA program performance and providing technical assistance
- Issuing certificates to youth apprentices upon program completion

### B. Role of Regional Consortia

While the DWD maintains oversight of the state's YA program and is responsible for many aspects of its operation as described above, individual YA programs are primarily administered at the local level by consortia of organizations and their representatives (often referred to as consortium "partners").

The formation of a regional YA consortium may be led by any one of the potential partners of such an effort. Examples include: school districts; chambers of commerce; local economic development corporations; technical colleges; Workforce Development Boards; employers and other workforce and education-related organizations.

Within the program design parameters described in Chapter 1, regional YA consortia determine in many ways how the YA program will function in their area.

Consortium partners' responsibilities include:

- Establishing geographic boundaries of their program (based on their participating school districts)
- Determining governance structure (part of a larger school-to-work partnership or operating independently, for example)
- Selecting program areas to offer
- Submitting the annual program and grant application to the DWD
- Hiring or arranging for a regional YA coordinator
- Developing marketing strategies
- Developing recruitment and selection procedures for student applicants
- Recruiting businesses to hire youth apprentices
- Monitoring the program to ensure compliance with state and school district requirements
- Ensuring that school and community services (counseling, health, etc.) are accessible to youth apprentices
- Arranging for fiscal management of grant funds and the appointment of a fiscal agent

### C. Role of Consortium Steering Committees

Each consortium is expected to form a steering committee to guide the development of their YA program and to help ensure its successful operation. Steering committees operate similarly to an executive committee or a

board of directors. Typically, many of the key partners in a consortium's youth apprenticeship program are represented on its steering committee including key businesses, participating high schools, chambers of commerce, trade representatives and others.

In some cases, another committee or other collaborative group will function as a consortium's YA steering committee. For example, a more general school-to-work committee, or a chamber of commerce's business and education partnership committee may take the lead in a YA effort in addition to its other programs and activities. Steering committees and their individual members perform many of the specific duties listed above for the consortium.

## D. Key Individuals

### 1. Regional Youth Apprenticeship Coordinators

Each consortium is required to have one individual functioning as its regional YA coordinator along with an alternate listed in its program/grant application. Many regional YA coordinators are employed by CESAs, technical colleges, chambers of commerce or other organizations leading the consortium's efforts. She or he may work exclusively with YA or have additional duties.

The regional coordinator is the primary point of contact for the DWD with each consortium. Consortia must notify the DWD if their regional YA coordinator is replaced with another by completing the contact information form, available here: [https://dwd.wisconsin.gov/dwd/forms/dws/deta\\_18442\\_e.htm](https://dwd.wisconsin.gov/dwd/forms/dws/deta_18442_e.htm) and submitting it by email to: [ya@dwd.wisconsin.gov](mailto:ya@dwd.wisconsin.gov).

Regional YA coordinators play a significant role within YA consortia and typically have primary responsibility for carrying out the administrative policies of the consortium and its steering committee. Their duties generally fall into three categories and include the following:

#### **Program Development and Management**

- Meeting with YA school-based coordinators regularly to review progress and address program concerns
- Providing mentor training
- Preparing and submitting required forms and reports to the DWD
- Attending statewide coordinator planning, informational meetings, and training sessions
- Arranging for appropriate related instruction
- Preparing grant proposals
- Securing additional program funding sources when needed
- Overseeing program grants and funds to ensure timely expenditures
- Assessing local business interest in potential new program areas

#### **Recruitment and Marketing**

- Assisting school-based coordinators in the recruitment of students
- Providing informational meetings for potential employers and contacting individual employers directly
- Providing course offerings, schedules and youth apprenticeship updates to school counselors, teachers and administrators
- Providing a communication network which includes the instructor, student, mentor, parents and school
- Developing a public information and marketing strategy including brochures and presentations for various student, parent, industry and community groups

#### **Evaluation and Reporting**

- Monitoring program registrations to ensure goals are met

- Coordinating the transfer of grades from the youth apprenticeship class and worksite to the respective schools in a timely manner
- Maintaining student records for local and state reporting
- Visiting job sites for evaluation purposes at least three times per year

## 2. School-Based Coordinators

High schools are an integral part of local YA consortia. When a school district agrees to be part of a consortium through the annual YA program application (through the School District Affiliation Agreement), they are asked to list each participating high school and the corresponding school-based coordinator. As with the regional YA coordinators, school-based coordinators may be exclusively assigned to the YA program, but more than likely will be school staff that have additional responsibilities.

School-based coordinators work closely with the regional YA coordinator in the implementation and operation of the program. The following activities are expected to be performed by school staff in participating high schools:

- Assisting with student recruitment by distributing YA promotional materials to students and parents
- Coordinating informational meetings with school staff, students, parents, and community organizations
- Serving as the program liaison with the regional YA coordinator and attending meetings as requested
- Meeting with the YA students on a regular basis
- Maintaining student records for local and state reporting
- Overseeing the academic grades and graduation status of the YA student
- Assisting the regional coordinator in identifying employers and mentors

In addition to the specific duties of the school-based coordinators, participating schools are also expected to ensure the following take place as they offer youth apprenticeships to their students:

- Assessing interested students and determining the student's ability to successfully complete the youth apprenticeship program
- Integrating the youth apprenticeship program into the student's overall educational program
- Determining which related instruction options are available and appropriate for each youth apprentice
- Issuing credit toward graduation for the youth apprenticeship program experience
- Signing the Education/Training Agreement for each student and complying with its requirements
- Arranging student schedules to allow for YA program participation

## 3. Fiscal Agents

Each YA consortium must identify a fiscal agent in their annual program/grant application. This must be a different individual than the consortium's regional YA coordinator and must be an employee of the Fiscal Agency listed on the grant application. The fiscal agent is responsible for managing the YA consortium budget, preparing budget modifications and submitting expenditure reports (in those consortia receiving state YA grant funds).

Expenditure reports are filed via Contract Management and Expenditure Tracking (COMET) Reports, which can be found at: <https://dwd.wisconsin.gov/comet/>. To gain a working knowledge of the DWD COMET system, fiscal agents are required to attend COMET-related training sessions as directed by the DWD. Fiscal agents work with the DWD's Division of Employment and Training (DET) fiscal staff in the performance of their duties and receive technical assistance from them.

## 4. Grant Signatory

Each YA consortium must identify a grant signatory in their annual program/grant application. This individual must have authorization to sign contracts on behalf of the consortium fiscal agency (be employed by the fiscal agency). The grant signatory is responsible for signing the Youth Apprenticeship contract and contract modifications.

Grant contracts are generally sent out mid June and can be signed and submitted electronically.

# Chapter 3: Program and Grant Application Process

To offer the Wisconsin Youth Apprenticeship Program, a consortium must apply to and be approved by the Department of Workforce Development (DWD). The same application is used by those who are also applying for state YA grant funds when funds are available. Only state-sanctioned YA programs are eligible to receive state YA grant funds. Those not seeking state YA grant funds but wishing to offer the Wisconsin Youth Apprenticeship Program must still apply to the DWD.

Consortia must consist of one or more school districts or a combination of one or more school districts, other public agencies, nonprofit organizations and interested individuals. Other organizations that are often included in a YA consortium are technical colleges, cooperative educational service agencies (CESAs), Workforce Development Boards and city or county youth service agencies.

The policies and practices described in this manual that apply to the Wisconsin Youth Apprenticeship Program ensure high quality apprenticeship experiences for the youth and the employers involved. State-sanctioned YA programs receive guidance and technical assistance from state staff on a wide range of programmatic needs, from employer engagement to grant budgeting as well as the opportunity to network with other youth apprenticeship programs and other workforce development programs and efforts. Also, only students registered in the Wisconsin Youth Apprenticeship Program will receive a Certificate of Occupational Proficiency upon completion.

### A. Application Timeline

The DWD reviews YA program applications from would-be consortia on an annual basis. While the exact timing of the application and review process can change slightly from year to year, the chart below gives the approximate dates and deadlines for the steps involved.

<b>Step</b>	<b>Approximate Timeframe</b>
Issuance of Request for Proposals (RFP) by the DWD	Late February/Early March
Application deadline	Late April
Review by the DWD and outside reviewers	Late May
Notification of Application Decision	Late May
Modified budgets due from those receiving partial funding or who are otherwise asked to resubmit	Early June
Program/grant effective dates	July 1 <sup>st</sup> to June 30 <sup>th</sup> (one year)

### B. Program/Grant Application Requirements

To be approved as a state-sanctioned YA program and to be considered for grant funding, a regional consortium must meet several criteria which are listed and explained in greater detail in the annual RFP. For example, they must:

- Request at least \$22,500 and plan to serve at least 25 students
- Plan to provide matching funds totaling 50 percent of the grant award
- Maintain on file a signed Partnership Agreement for each consortium partner
- Maintain on file a signed Affiliation Agreement for each participating school district
- Designate a regional YA coordinator and an alternate
- Identify school-based coordinators for each participating high school
- Designate a fiscal agent
- Demonstrate the capacity to deliver the program in accordance with this Policy Manual and all requirements listed in the RFP

If interested parties are unable to meet the minimum application requirements as their own consortium, they are encouraged to join another partnership so students in that region can participate in the program.

Applications will be scored by the DWD and outside reviewers and funding will be allocated based on these scores as well as on the amount of available funding for the coming grant year. The scoring process is further explained in the RFP.

### C. Program Funding and Expense Reimbursement

The state YA grant program is an allowable-expense reimbursement grant program with funding statutorily limited to \$900 per student served.

Consortia must provide matching funds equal to at least fifty percent of grant funds awarded.

State YA grant funds typically do not cover all expenses incurred in the operation of a YA program and are meant to augment other sources secured by each consortium. Employers pay the apprentice's wages, for example, and school and other consortium partner staff often contribute time not compensated for by the state YA grant funds.

Per Wis. Stat. § 106.13, grant funds may be used for the following expenses:

- Recruiting employers to provide on-the-job training and supervision for youth apprentices and providing technical assistance to those employers
- Recruiting students to participate in the local youth apprenticeship program and monitoring the progress of youth apprentices participating in the program
- Coordinating youth apprenticeship training activities within participating school districts and among participating school districts, postsecondary institutions and employers
- Coordinating academic, vocational and occupational learning, school-based and work-based learning and secondary and postsecondary education for participants in the local youth apprenticeship program
- Assisting employers in identifying and training workplace mentors and matching youth apprentices and mentors
- Other implementation or coordination activities that the department (DWD) may direct or permit the local partnership to perform

Regularly submitting reimbursement requests, either on a monthly or a quarterly basis, is highly recommended.

Wisconsin Youth Apprenticeship Program applications and further information can be found at: <https://dwd.wisconsin.gov/youthapprenticeship/> as well as by contacting youth apprenticeship staff at the DWD at: [ya@dwd.wisconsin.gov](mailto:ya@dwd.wisconsin.gov).

# Chapter 4: Youth Apprentice Registration

## A. Student Recruitment

Consortia must establish student recruitment processes which aim to make all eligible students at participating schools aware of the available YA opportunities. As described in Chapter 2, student recruitment is typically conducted by a consortium's school-based coordinators and regional coordinator. Activities may include distribution of YA materials within the school and at events such as career fairs and other career exploration activities, as well as through one-on-one student recruitment.

Consortia are encouraged to include parents or guardians of students as fully as possible in the recruitment process so they can assist students in making informed decisions about participating in the YA program.

Specific strategies should be developed to recruit students into nontraditional opportunities, to recruit "at risk" students and students with disabilities. ("At-risk" is defined in Wis. Stat. § 118.153(1), available at: <http://docs.legis.wisconsin.gov/statutes/statutes/118/153>.)

## B. Student Eligibility

### 1. Initial Eligibility Criteria

To be initially eligible for a youth apprenticeship, students must:

- Be enrolled in a participating public or private secondary school or another approved program which leads to high school graduation or its equivalent
- Be entering at least the junior year of their secondary education
- Have participated in career exploration, guidance or education activities which allow them to make an informed choice about their chosen career area

Any additional eligibility criteria used by consortia must be pre-approved by the Department of Workforce Development (DWD).

Also, consortia are not allowed to use a student's grade point average to disqualify otherwise eligible students from participation.

### 2. No Guarantee of a Youth Apprenticeship

The criteria above are merely initial eligibility criteria and do not guarantee that a student will become a youth apprentice. In addition to these initial eligibility criteria, to become an apprentice the interested youth must become employed by an employer willing and able to meet its responsibilities under the program (see Chapter 6) and be enrolled in sufficient consortium-approved related instruction courses (see Chapter 5). Meeting the criteria above should be understood as a first step toward a youth apprenticeship.

Interested parties should contact the school district in which they live to inquire about youth apprenticeship opportunities or they may look up the youth apprenticeship consortia operating in their area and do the same. The Youth Apprenticeship Regional Consortia Directory includes contact information and lists the participating high schools in each consortium, and is available at the YA website: <https://dwd.wisconsin.gov/youthapprenticeship/>.

### 3. Home-Schooled Youth

#### a. Meeting the Initial Eligibility Criteria

Home-schooled youth are eligible to participate in the Wisconsin Youth Apprenticeship Program if the criteria above are met.

Wisconsin's compulsory education law requires any child under the age of 18 to attend a public or private school or to be enrolled in a home-based private educational program. To be enrolled in a home-based private educational program, the parent or guardian of the child must file form PI-1206 online with the Wisconsin Department of Public Instruction on an annual basis. Through the PI-1206, the parent or guardian attests that the home-based schooling meets several statutory requirements, including that the youth will receive at least 875 hours of instruction in a sequentially progressive curriculum of fundamental instruction in reading, language arts, mathematics, social studies, science and health.

A student's status as a junior or senior is a key criterium in the Wisconsin Youth Apprenticeship Program. To ensure status as a junior or senior and to meet this initial eligibility criterium, YA coordinators may ask parents or guardians of home-schooled youth interested in youth apprenticeship to attest to the students related grade level. This may be done via a signed statement from the parent or guardian or through provision of the PI-1206 for the years prior to beginning a youth apprenticeship.

The Wisconsin Department of Public Instruction recommends that parents and guardians of home-schooled youth retain copies of their home-schooling calendar as well as course outlines which can verify for potential employers or postsecondary educational institutions that there in fact has been a sequentially progressive curriculum of fundamental instruction provided as described above.

Also, YA coordinators may ask parents or guardians of home-schooled youth whether the required career exploration activities have taken place, to ensure the student is pursuing an apprenticeship with forethought and may assign the activity or any other prerequisite as a condition of participation if all the YA students are mandated to do the same.

#### b. Opportunities for Related Instruction for Home-Schooled Youth

All youth apprentices must complete at least two related instruction courses during each year of their apprenticeship. Chapter 5 includes more detail on this important aspect of the Wisconsin Youth Apprenticeship Program. There are several options for meeting the related instruction requirement for home-schooled youth, as there are for non-home-schooled youth. Wisconsin law allows home-schooled youth to enroll part-time in a public high school, for example. They may take up to two courses per semester in any public secondary school in the state if there is space available in the courses in question. Other options exist as well, such as taking related instruction at a technical college or online. As described in greater detail in Chapter 5, each YA consortium decides whether a course qualifies as related instruction.

### C. Hiring Youth Apprentices

#### 1. Non-Discriminatory Hiring Practices and Records

No individual shall be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any youth apprenticeship program on the basis of the person's sex, race, religion, national origin, ancestry, creed, pregnancy, marital or parental status, sexual orientation or physical, mental, emotional or learning disability.

Employers interview and make final hiring decisions of youth apprenticeship applicants. During this process, they must follow non-discriminatory interviewing and hiring procedures. If employers or consortia members



have questions about acceptable human resources practices, they can contact the DWD's Equal Rights Division/Civil Rights Bureau. Information and contacts are available at: [https://dwd.wisconsin.gov/er/civil\\_rights/](https://dwd.wisconsin.gov/er/civil_rights/).

If student applications include information about ethnic background, marriage or parental status, disabled status, or "at-risk" status, those applications may not be shared with employers prior to interviewing and hiring.

Records must be maintained on all applicants, including those not selected for the program. Records must include a copy of the application, an interview summary if created, and the basis for selection or rejection of the applicant. The records must permit identification of ethnic background, gender and student applicants with disabilities. See the section later in this chapter for specific record retention requirements.

## 2. Background Checks

The Wisconsin Fair Employment Law allows employers to question both adults and juveniles about a criminal background when the employee is required to be bonded as a condition of hire or background checks are required. For would-be youth apprentices, this may occur most commonly in the Finance and Health Science program areas. Federal Deposit Insurance Corporation (FDIC) regulations may prohibit lending institutions from hiring people with a criminal background in the Finance program area. Additionally, the Wisconsin's Caregiver Law requires background and criminal history checks of certain personnel who are responsible for the care, safety and security of children and adults.

The DWD recommends that recruitment and application materials notify students and parents that the students in the Finance program may be required to be bonded and may be asked about any criminal background as may those in the Health Science program.

Any questions or concerns may be directed to the DWD's Civil Rights Bureau. Contact names and numbers can be found at: [https://dwd.wisconsin.gov/er/civil\\_rights/](https://dwd.wisconsin.gov/er/civil_rights/).

## 3. Students Already Employed

A student may wish to become a youth apprentice while they are already working. This does not make the student ineligible for participation in the program if the job is in one of the approved program areas and the other eligibility requirements are met. For example, the student must still have taken part in career exploration or counseling activities so the apprenticeship is one that puts the student on a possible long-term career path. Also, an experienced employee at that employer must serve as the youth apprentice's mentor, and the job must be one in which the skill standards checklist, explained in greater detail in Chapter 6, must be achievable in that position. If it is not, the student, with the help of the coordinator, must gain alternative or additional employment that allows for attainment of those skills.

### D. Youth Apprentice Registration with the Department of Workforce Development

#### 1. Registration Timeline

Once a student is hired as an apprentice by an employer, regional coordinators have fifteen days to complete registration of that apprentice with the DWD. They do so by utilizing the Youth Online Data Application (YODA), a web-based registration system, available at: <https://dwd.wisconsin.gov/youthapprenticeship/register.htm>.

In YODA, registration includes entering student information, selecting industry and pathway, entering employer information and uploading the signed Education and Training Agreement.

Each coordinator or administrative assistant wishing to use YODA must create a unique logon and submit a DETS-10-E System Access Request form to: [DETSecurity@dwd.wisconsin.gov](mailto:DETSecurity@dwd.wisconsin.gov). First-time users should watch the tutorial webinars available at the YODA website given above before registering new students.

Business Objects reports are also available to all YODA users. These reports allow users to view student data they have entered through YODA during registration. A tutorial webinar is also available at the YODA website given above to learn how to view and utilize these reports.

At the time of registration, apprentices are listed as either a Level One apprentice (a one-year program) or a Level Two (a two-year program). Also required is information about the employer, wages, and the mentor who will be assisting the apprentice.

To help coordinators gather the required information to be entered into YODA, a student registration form is available from the DWD at: [https://dwd.wisconsin.gov/dwd/forms/dws/ya/detw\\_14916\\_e.htm](https://dwd.wisconsin.gov/dwd/forms/dws/ya/detw_14916_e.htm).

Coordinators may develop their own local forms for gathering registration information only if those forms contain all the information items included in the DWD Form 14916.

## 2. Education/Training Agreement (ETA)

An important document in the apprenticeship program is the Education/Training Agreement (ETA). The ETA includes descriptions of the responsibilities of the various parties involved in a youth apprenticeship: the apprentice, their parents or guardians, the employer and the school district.

Coordinators are responsible for ensuring that all parties review, sign and receive a copy of the agreement. Copies must then be kept on file at the place of employment and at the school.

A fully signed copy of the agreement is effective immediately, and the agreement must be on file with the employer and the school when the student begins working as an apprentice. The DWD must receive a copy of the agreement within 15 days of the student's work start date. The preferred method of submitting ETAs to the DWD is through YODA.

If there is a change in an apprentice's status, a new ETA must be signed and kept on file by all parties. This includes when an apprentice changes jobs, adds a secondary employer or extends their employment. The new ETA should be processed through YODA within fifteen days of the change in status.

The ETA is a State of Wisconsin legal document for the Wisconsin Youth Apprenticeship Program and consortia cannot edit the form or delete any of the information on the document.

The ETA form can be found at: [https://dwd.wisconsin.gov/dwd/forms/dws/detw\\_9471\\_e.htm](https://dwd.wisconsin.gov/dwd/forms/dws/detw_9471_e.htm).

### E. Registration and Funding Periods

As stated earlier, youth apprenticeships consist of employment (work-based learning) and continued schooling (including related instruction). The work-based learning component in either Level One or Level Two apprenticeships may begin upon completion of the sophomore year if the student's age does not violate employment of minors legal restrictions for that occupation.

Work-based learning in Level One apprenticeships may begin as late as January of the senior year, and for Level Two apprenticeships as late as January of the junior year.

Students can only be counted for grant funding purposes in fiscal years in which they have begun both their work-based learning with the employer named in their ETA and their related instruction. Level One

apprentices are generally counted for one fiscal year, and Level Two apprentices are generally counted for two fiscal years. No apprentice can be counted for grant funding in more than two fiscal years.

If, at the end of the two-year period a Level Two apprentice is unable to fulfill the requirements for completion because either their required skill attainment or work hours are insufficient, they may be awarded a Level One certificate if they are able meet those skill and work hour requirements. Coordinators must contact the DWD requesting such a change. They will be required to provide an explanation as to why the student was unable to complete their work hours or required skills and a description of the consortium's activities on behalf of the apprentice in the second fiscal year. They must also indicate the related instruction which had been taken that year. This explanation will be added to the comments field for the apprentice. If the change is approved, coordinators may submit the skill standards checklist as normal. Apprentices processed this way will complete as Level One apprentices, but the consortium will receive credit for the apprentice in two fiscal years for grant funding purposes.

At-risk and other special needs students may take more than one year to complete the Level One program requirements, provided the plan for doing so has been approved by the DWD.

Students who complete more than one youth apprenticeship in a fiscal year may not be counted twice for grant funding purposes. Work hours and related instruction requirements must be met for each program separately, even if at the same employer. The DWD discourages students from attempting more than one youth apprenticeship program in a single year as the schedule of work is too difficult for most students.

## F. Maintaining Participation

To maintain their status as a youth apprentice, students must:

- Maintain good attendance at school and the job, as defined by the YA consortium
- Perform at an acceptable level in both the related instruction class and at the worksite as determined by the YA consortium
- Comply with all work rules and requirements at their place of employment
- Meet with the mentor and either the regional YA coordinator or school-based coordinator at least three times per school year to review their progress in the program
- Maintain progress toward completion of secondary schooling

The YA consortium must outline any policies regarding attendance and performance in writing and make the policy available to all instructors, mentors, youth apprentices and parents or guardians at the time of registration. These policies may be created by the consortium, or the consortium may utilize the attendance and performance policies of the student's school district and employer.

## G. Student Transfer Procedures

If a student moves from one consortium's coverage area to another during the youth apprenticeship, the DWD encourages consortia to collaborate to ensure that the student can complete the program.

This may involve transferring the student to the new geographic area's consortium. A transfer may occur with the agreement of both regional coordinators involved. The consortium that is relinquishing the student should terminate the student using YODA and checking the "Student has transferred to another consortium" option. Then, the consortium that is receiving the student must submit a new ETA and notify the YA Database Administrator of the transfer by email to: [ya@dwd.wisconsin.gov](mailto:ya@dwd.wisconsin.gov).

If a student transfers during a fiscal year, the original consortium may count that student toward their registration total for grant funding purposes during that year, the receiving consortium may not. For additional guidance, contact state YA staff at: [ya@dwd.wisconsin.gov](mailto:ya@dwd.wisconsin.gov).

## H. Program Completion Procedures and Closure

### 1. Student Termination from the Program

If a youth apprentice voluntarily withdraws from the program they should be encouraged to complete the current semester's related instruction class so that academic credit may still be granted for courses successfully completed.

Employers may dismiss or fire youth apprentices who do not comply with work rules or requirements. In such a case, the consortium is not obligated to find another employer or to retain the youth apprentice in the program if she or he has been fired for cause (at which point the ETA is void). The YA coordinator should be notified prior to the termination, however, and a meeting of all parties should be held unless the violation is serious enough to warrant immediate dismissal.

If a youth apprentice believes that she or he has been discriminated against or dismissed unfairly, a grievance may be filed following the consortium's written grievance policy. Alternatively, a complaint may be filed with the Equal Rights Division in the Department of Workforce Development.

If a YA consortium has a written "Student Course Reimbursement Policy" that has been approved by their school board, and the youth apprentice and their parent or caregiver were made aware of this policy, the consortium may require the student to reimburse them for costs incurred on YA-related classes that the apprentice failed to complete.

Youth apprentices' separation from the program, whether voluntary or involuntary, must be recorded in YODA within fifteen days. If the youth apprentice was participating in a Level Two program and was terminated before the commencement of the second school year, the coordinator must notify the YA Database Administrator of the termination by email at: [YA@dwd.wisconsin.gov](mailto:YA@dwd.wisconsin.gov) so credit for the second fiscal year is removed. In all other cases, termination can be performed by a YODA user without further involvement of DWD staff.

### 2. Graduation and Certification Procedures

Successful completion of a youth apprenticeship includes attainment of the required job skills (as enumerated in the skill standards checklist), completion of the required work hours and completion of secondary schooling (including the required related instruction courses). Upon completion, youth apprentices are issued a Certificate of Occupational Proficiency signed by the Secretary of the Wisconsin Department of Workforce Development.

#### a. Documentation Requirements

Submission of two completed documents is required to signify completion of the YA program: the skill standards checklist and the post-program completion survey (PPCS). Checklists are uploaded to YODA as a PDF file and PPCS data are keyed directly into YODA.

Both must be submitted within 90 days of completion of secondary schooling. (The PPCS is only required of graduating seniors, not those who have completed a Level One apprenticeship while a junior). Most Wisconsin secondary school graduations occur in early June. Therefore, by September 30<sup>th</sup> all checklists and PPCS information should have been submitted by YA consortia.

If a student has not completed the work hours requirement by their high school graduation date, they may continue to work through August 31<sup>st</sup>. However, the deadline for submission of their checklist and PPCS is still ninety days after their high school graduation.

Students who are eligible for early graduation will receive certificates if they have completed all program and documentation requirements. (Students still have ninety days after graduation to complete the YA program requirements.)

The DWD will review checklists for attainment of the required skills and work hours and will notify coordinators of any deficiencies. The DWD retains the right to refuse to issue a Certificate of Occupational Proficiency if the required documentation is not satisfactorily submitted within the stated deadlines.

## b. Closure of Apprentices Status

By September 30<sup>th</sup>, all apprentices with their final or only apprenticeship year ending in the previous fiscal year should have either completed or been terminated from the program as described above. The DWD shall send a list to each consortium of previous-year students who are still in incomplete status as of September 1<sup>st</sup> to help ensure this occurs. The regional YA coordinator should identify the status of and action to be taken for each student on the list. For example, they may need to send a termination form or to submit a completed skill standards checklist or PPCS. Apprentices who are still in incomplete status as of September 30<sup>th</sup> will be terminated.

The following table summarizes YA program completion steps and corresponding deadlines.

<b>Activity</b>	<b>Deadline/Date</b>
Completion of work hours	August 31 <sup>st</sup> after graduation
Submission of post-program completion survey	90 days after graduation
Submission of completed skill standards checklist	90 days after graduation
Reminder sent to YA coordinators for those apprentices not yet completed or terminated	September 1 <sup>st</sup>
Termination by the DWD of those YAs from previous school year that remain unaccounted for	September 30 <sup>th</sup>

## I. Record Retention

Individual records regarding youth apprentices should be retained in a central location by the consortium's regional YA coordinator or fiscal agent. The chart below provides details for each of the documents that must be retained.

<b>Record</b>	<b>Period Retained</b>	<b>Commencing</b>
DWD Registration Form 14916 (if used)	3 years	Completion of program
Student YA Application (consortium-created document, if used)	3 years	Completion of program
Employer Application (if used)	3 years	Completion of program
Curriculum Map or Plan of Study	3 years	Completion of program
Education/Training Agreement (ETA)	3 years	Completion of program
Rejected Student YA Application	1 year	Upon rejection
Consortium's Annual YA Program/Grant Application	3 years	Completion of the program year (runs concurrent to the fiscal year and ends June 30 <sup>th</sup> )

Financial records, supporting documents and any other records pertinent to the grant award	3 years	Submission of final expenditure report
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Documents may be maintained in paper or electronic form and must be available to DWD staff upon request.

The DWD will maintain student records obtained through the Youth Online Data Application (YODA) program, which is explained in more detail in Chapter 4. DWD YA staff will also retain copies of key program documents including the ETA and the completed skill standards checklist.

## J. Grievance Policy and Procedures

Regional YA consortia must maintain written grievance policies and procedures. A copy of these should be given to all youth apprentices, parents or guardians, employers and school personnel involved in the program and must be included with the annual program/grant application to the DWD.

The grievance policy should include multiple levels of appeal. The DWD may be listed as the final level of appeal in the process. A regional consortium may choose to follow individual school policies if the steering committee is included as one of the levels for appeal.

Timelines of the steps involved should be included to ensure that grievances are resolved in a timely manner. DWD staff will provide technical assistance, when requested, in developing and implementing the grievance policy.

# Chapter 5: Program Guides and School-Based Learning (Related Instruction) Requirements

Youth apprentices learn in the classroom and on the job site. This chapter describes the statewide program guides which are to be used by regional consortia operating YA programs and the school-based learning portion of the program.

## A. Youth Apprenticeship Program Guides

The learning requirements of the youth apprenticeship program are detailed in program guides written for each program area. Each program guide is developed through a collaboration of business, education and trade representatives to identify the skills and knowledge that are necessary for successful program completion. The guides incorporate and are aligned with national industry skill standards for fields in which those exist.

All youth apprentice consortia must utilize the statewide program guides for the program or industry areas in which their students are registered. Program guides are available on the Department of Workforce Development (DWD) Youth Apprenticeship website: <https://dwd.wisconsin.gov/youthapprenticeship/>.

These comprehensive program guides include several appendices which are accessible as stand-alone documents at the website above. They include, for example: Program Guide Overview; Work Contracts, Employment of Minors (Child Labor) Laws, Liability and Insurance; Implementation Guide for Employers; Recommendations for Related Instruction; Skill Standards Checklist; Course Outcome Summary, and detailed learning objectives for each of that program area's pathways. (For example, within the Finance program area, an apprentice may choose from the insurance, banking and related services, and business financial management pathways.)

## B. Related Instruction

Choosing related instruction courses for potential youth apprentices is a key step in the apprenticeship process. As stated above, the guides include recommendations for the classroom instruction portion of each program, referred to as "related instruction" as well as learning objectives in each of the program area pathways. Coordinators should begin by reviewing the learning objectives for the relevant pathway and then cross-walking those objectives to the course options available to ensure relevancy. They may need to consult with course instructors to gain a sufficient grasp of what is to be taught in any particular course (whether at the high school, a technical college, online, or through other means). DWD recommends that consortia consult with their school district and school board partners as necessary to identify appropriate related instruction.

While each consortium determines the related instruction for their youth apprentices, this decision is subject to oversight by the DWD. Because unrelated courses will not count toward the YA program requirements, if, after consulting the program guides and school district partners, questions persist about which courses should qualify as related instruction, coordinators should contact the DWD for clarification and verification.

### 1. Amount and Location of Related Instruction

Two semesters of related instruction are required for each year of a youth apprenticeship. One course can be taken each semester or two courses may be taken during one semester. However, at least 250 hours of each year's 450-hour work requirement must occur during the weeks in which related instruction is taken so the classroom instruction and worksite learning can reinforce each other. Because of this requirement, it is advised that at least one related instruction course be taken during each semester a student is registered as a youth apprentice.

It is the responsibility of each consortium to determine the most effective method of delivering the related instruction to the students. The required courses may be delivered at the high school, a technical college, an online program, a business site, a trades training center, or any combination of these which assures satisfaction of high school graduation requirements and attainment of required job skills.

Non-youth apprentice students may be enrolled in the related-instruction classes. It is not recommended that youth apprentices be enrolled in classes intended for adults unless specific arrangements are made to accommodate the learning style of high school age youth.

## 2. Instructor Qualifications

The instructor of each related youth apprenticeship course is responsible for evaluating the student's classroom performance.

High school instructors who teach the youth apprenticeship related instruction must be licensed to teach in that occupational area (if applicable) and have demonstrated knowledge of current business practices and techniques either through continuing education credits, recent work history in the industry or technical college certification.

Technical college instructors who teach the youth apprenticeship related instruction must be certified by the Wisconsin Technical College System to teach in the specific occupational area.

Online instructors who teach the youth apprenticeship related instruction must be teaching at a virtual charter school as defined by Wis. Stats. § 115.001(16). For a list of these schools along with other information regarding virtual schools in Wisconsin, visit:

<https://dpi.wi.gov/sms/charter-schools/virtual-charter-schools>.

Industry trainers who teach the related instruction must have at least three years of experience in the industry or business or be a qualified journeyman. It is recommended that trainers be certified by the local technical college or an appropriate trade or industry association (e.g. the American Institute of Business), or be team teaching with a certified instructor and have experience teaching high school age youth.

Within these parameters, consortia may hire the most appropriate instructor for their program. Since students are required to receive school credit for their instruction, instructor qualifications must meet any local criteria required by the school districts and supported by the school board to grant school credit. Evidence of instructor qualifications should be documented by the consortium or the participating school.

## 3. Secondary and Post-Secondary Credit for Youth Apprentices

School districts must provide credit toward high school graduation for the youth apprenticeship-related instruction and the work-based learning component of the program. The amount of credit for each component is to be determined by the school district.

Wisconsin Technical Colleges and school districts, in coordination with the regional YA consortia, are expected to create local articulation agreements in which students, including youth apprentices, may gain post-secondary credit for courses completed while in high school. Articulation is the process of comparing the content of courses that are transferred between secondary and postsecondary institutions such as technical colleges or universities. There are two types of articulation: Advanced Standing (AS) or Transcribed credit (TC) options. See the Definitions section on page 1 for descriptions of these.

Local technical college articulation agreements and the Wisconsin Technical College System's Credit for Prior Learning policy provide incentives for the students to transition from secondary to post-secondary education.



It is expected that such efforts to bridge secondary and post-secondary programming and credit will continue and even increase. Interested parties should consult with the regional YA coordinator in their area or the high school-based coordinator at their school for more information.

## Chapter 6: Work-Based Learning Requirements

Employment is a fundamental component of a youth apprenticeship. The attachment to an employer as an employee is a program characteristic that distinguishes youth apprenticeships from many other career-related opportunities for high school students, including job-shadowing and short-term internships.

To ensure a high-quality work experience for the student as well as for the employer certain activities must occur prior to the apprenticeship and several mechanisms must be in place during the apprenticeship. In this chapter, we review the requirements and characteristics of youth apprenticeship employment.

### A. Required Activities Prior to a Youth Apprenticeship

A student must have participated in career exploration activities or counseling prior to the apprenticeship to gain an understanding of their options and to start thinking about their career interests and goals. This requirement exists so that the job that is attained for the apprenticeship has been chosen in a deliberate manner and that the work experience will not only instill general employability and soft skills, but will also result in a long-term career path opportunity for the youth apprentice.

With the advent of required Academic and Career Planning (ACP) for all school boards in July of 2017, it is more likely that such career exploration is taking place for all students. (ACP requires that school boards ensure that they are "providing academic and career planning services to pupils enrolled in grades 6 to 12.") Youth apprenticeship school-based coordinators should still proactively ensure, however, that the required activities or counseling has taken place prior to a student's registration as a youth apprentice.

### B. Work Hour Requirements

Students registered as one-year apprentices complete at least 450 hours of work during that time, 250 of which must be taken concurrently with the related instruction courses (described in Chapter 5) so that classroom instruction and worksite learning are integrated. Students registered in two-year youth apprenticeships must complete a minimum of 900 hours of work with at least 500 taking place during the weeks when related classes are held. These work hour requirements equate to roughly ten to fifteen hours of work per week during the school year for most youth apprentices.

Youth apprentices may work more than these minimum hours and some apprenticeships may even require additional work hours to master the job skills included in the applicable skill standards checklist.

Work hours may only be applied toward the YA program's required hours if the student is working on the youth apprenticeship-related tasks during that time.

Youth apprentices may be scheduled to attend school for a portion of each day and work for the remainder of the day or may be scheduled for alternating full days in school and full days on the job. Youth apprentices may also work evening and weekend hours (see employment of minors guidelines below).

Youth apprentices are expected, but not required, to continue employment through the summer while registered in the program. They may work in areas of the company related to their apprenticeship or in different areas, but only the YA-related work counts toward the 450/900 work hours requirement.

Apprentices who have not completed the required work hours by the time they graduate from high school may continue working through the summer after graduation to do so. All such work must be completed by August 31<sup>st</sup>. See Chapter 4 for more information related to program completion procedures.

Whether students may be employed as youth apprentices in a business owned by their family is decided by each regional consortium.

## C. Employer Responsibilities

Employers that want to hire a youth apprentice are responsible for the following:

- Interviewing and hiring the youth apprentice
- Providing enough work hours for the apprentice to meet the work hour requirements
- Paying the youth apprentice at least the minimum wage
- Providing workers compensation or comparable liability coverage
- Ensuring the youth apprentice is trained in the required skills as enumerated in the provided skill standards checklist
- Providing a workplace mentor (whose duties are described below)
- Ensuring all employment of minors laws are followed
- Ensuring that safety instructions are provided
- Signing and complying with the Education/Training Agreement for each youth apprentice

## D. Workplace Mentor Requirement

Each youth apprentice must be assigned a mentor at the workplace. The mentor may assign multiple trainers to instruct the youth apprentice while they rotate among the various workstations or departments. One mentor may work with multiple youth apprentices.

In choosing or recruiting mentors, employers should look for strong communication skills and experience working with adolescents, either on the job or through family or other outside activities.

The mentor is responsible for:

- Developing a training and work plan for the youth apprentice which will ensure that the student can learn the required job skills during the program
- Assigning the youth apprentice to appropriate trainers within the company if they themselves are not acting as the trainer
- Evaluating the youth apprentice's progress on a regular basis and completing the skill standards checklist as directed by the school-based or regional YA coordinator (they may need to collaborate with trainers of the youth apprentice to obtain sufficient information)
- Providing feedback for students on YA post program completion survey during final evaluation meeting
- Providing support, encouragement, direction, and information about the workplace
- Attending mentor training as requested by the school-based or regional YA coordinator

## E. Completion of the Skill Standards Checklist

Program Guides, as described in Chapter 5, include skill standards checklists for each of the program areas and their pathways. These checklists enumerate and briefly describe the skills that must be learned on the job for the apprentice to complete the program. The school-based or regional YA coordinator are to share these checklists with potential employers prior to registration of the student as a youth apprentice and their being hired. This is done to ensure that expectations are clear and that the job in question will allow for the learning of the required skills. They will also instruct the employer, perhaps specifically the workplace mentor, on how and when the checklist needs to be filled out. A completed skill standards checklist is required for an apprentice to complete the program and be presented with a Certificate of Occupational Proficiency.

## F. Employment of Minors Laws (formerly "Child Labor Laws")

Youth apprentices are hired by and become employees of the businesses participating in the program and are therefore subject to all state and federal laws related to the employment of minors if under 18.

## 1. "Student Learner" Status

The Wisconsin Administrative Code contains provisions which define a "student learner" classification of employee. Youth Apprentices are student learners, as found in Wis. Admin. Code § DWD 270.14(3)(a).

As student learners, youth apprentices may perform certain tasks that would otherwise be disallowed as hazardous if that work is incidental to the training and is for intermittent and short periods of time. Also, the work performed must be under direct and close supervision of a qualified and experienced person and there must be a schedule of organized and progressive work processes to be performed on the job.

The Administrative Code also lists several types of work which remain off limits to youth regardless of their status as student learners. For a full list of those as well as other details of the student learner classification, see Wis. Admin. Code § DWD 270.14, available at:

[http://docs.legis.wisconsin.gov/code/admin\\_code/dwd/270\\_279/270/14](http://docs.legis.wisconsin.gov/code/admin_code/dwd/270_279/270/14).

Youth apprenticeship program curricula are reviewed for employment of minors law compliance, but youth apprenticeship coordinators are still encouraged to contact the DWD Equal Rights Division, Labor Standards Bureau with concerns regarding specific tasks or equipment at (608) 266-6860 or:

[erinfo@dwd.wisconsin.gov](mailto:erinfo@dwd.wisconsin.gov).

A copy of the signed Education/Training Agreement (ETA) must be kept at the worksite to verify that the youth apprentice is a student learner in a school-sponsored program in the event there are questions about their activities at the worksite. See Chapter 4 for further details regarding the ETA.

## 2. Hours Restrictions and Work Permits

As juniors or seniors in high school, most youth apprentices are sixteen years old or older. Wisconsin and federal laws do not limit the hours that sixteen and seventeen-year-olds may work, other than generally holding that they may not be employed or permitted to work during hours of required school attendance. Student learners, however, as described above, can work during school hours since they are registered in a work-based learning program, in this case youth apprenticeship.

It is also possible for a youth apprentice to be fifteen years old. The following table includes the hour limitations for 14 and 15-year-olds.

<b>Maximum Hours of Work for 14 and 15-year old minors</b>	<b>After Labor Day through May 31</b>	<b>June 1 through Labor Day</b>
<b>Daily Hours</b>		
Non-School Days	8 hours	8 hours
School Days	3 hours	3 hours
<b>Weekly Hours</b>		
Non-School Weeks	40 hours	40 hours
School Weeks	18 hours	18 hours
Permitted Time of Day	7 AM – 7 PM	7 AM – 9 PM

Work permits are not required of youth apprentices for work performed as part of their apprenticeship. If a youth is engaging in other work for an employer, however, the YA exception does not apply and they should gain a work permit if otherwise required. Such work permits are otherwise required, as of June 23, 2017, for those under 16 years of age. More information on work permits for minors can be found at:

[https://dwd.wisconsin.gov/er/labor\\_standards/work\\_permit/default.htm](https://dwd.wisconsin.gov/er/labor_standards/work_permit/default.htm).

### 3. Wages

The Fair Labor Standards Act requires employers to pay youth apprentices for all hours worked as part of the program. Beginning wage rates must be no less than the minimum wage. For more information on current minimum wage rates, go to: [https://dwd.wisconsin.gov/er/labor\\_standards/minimum\\_wage.htm](https://dwd.wisconsin.gov/er/labor_standards/minimum_wage.htm).

### 4. Unemployment Insurance

Wisconsin's unemployment insurance laws exclude certain types of work from its definition of "employment" for purposes of unemployment insurance eligibility. Youth apprentices, if enrolled full-time in a non-profit or public educational institution and receiving academic credit for their participation in the program are not eligible to file for unemployment insurance from their YA employer (Wis. Stat. § 108(15)(j)). Youth apprentices who do not meet these criteria may, under certain circumstances, be eligible for unemployment insurance benefits if they are terminated from their employment. For assistance on unemployment insurance issues, please visit the Department of Workforce Development's Unemployment Insurance Division website at: <https://dwd.wisconsin.gov/ui/>.

### 5. Worker Compensation/Liability

Youth apprentices must be covered by a workers compensation policy. Employers should review their policies to ensure there are no restrictions on employing minors or on coverage of minors operating particular machinery. The worker's compensation reporting requirements for youth are no different than for adults for an injury or death while on the job. To learn more about those requirements, visit the Department of Workforce Development's Worker's Compensation Division website at: <https://dwd.wisconsin.gov/wc/> and email workers compensation staff at: [dwwdwc@dwd.wisconsin.gov](mailto:dwwdwc@dwd.wisconsin.gov).

School districts are responsible for providing liability coverage for students in school facilities and at school-sponsored functions or activities. They are not responsible for, and in fact cannot provide liability coverage for the work-based learning activities provided by a youth apprenticeship employer.

Neither the Department of Workforce Development nor schools can exonerate employers from liability if a youth apprentice is injured on the job and a subsequent lawsuit is filed.

Youth apprentices who are responsible for their own transportation to and from the worksite are responsible for their own insurance coverage while in transit. Schools which provide transportation are responsible for providing insurance coverage for the students while in transit.

### 6. Worker Displacement

Employers may not hire youth apprentices who would displace a currently employed worker (including a partial displacement, such as a reduction in the hours of non-overtime work, wages, or employment benefits).

### 7. Collective Bargaining Agreements

Hiring of youth apprentices may not impair the existing contracts for services or collective bargaining agreements of an employer. The Department of Workforce Development also recommends that employers with organized labor obtain the concurrence of the labor organizations prior to hiring youth apprentices to ensure full support of participation in the program.

Youth apprentices may be required to become union members if that is a condition of the employer's collective bargaining agreement or that is agreed to by management and the union organization as a condition of hiring youth apprentices. It is recommended that the youth apprentice's pay rate be increased to cover the cost of union dues if that occurs.

## 8. Layoffs/Strikes

Employers may not hire youth apprentices under either of the following circumstances:

- If any other employee at the business is on temporary layoff, with the clear possibility of recall, from the same or any substantially equivalent jobs
- If the employer has terminated the employment of any regular employee or otherwise reduced its workforce with the intention of filling the vacancy with a youth apprentice

Bargaining agreements should determine the status of youth apprentices already working in the company in the event of layoffs. Youth apprentices may be laid off or transferred to work areas which are not experiencing layoffs. They may not continue to work in or be transferred to work areas to take the place of laid-off workers.

Employment of minors laws prohibit youth apprentices from working in a company where a strike or lockout is in active progress.

# Chapter 7: Program Evaluation and Monitoring

The 1991 enabling legislation which authorized the Department of Workforce Development (DWD) to provide a youth apprenticeship program includes several program parameters as well as outcome requirements. In this chapter we examine those requirements, additional program goals created by the DWD and monitoring procedures.

## A. Statutory Outcome Requirements

Wis. Stat. § 106.13 provides the following outcome requirements of youth apprenticeship consortia which receive a grant from the Department of Workforce Development:

- At least 80 percent of the youth apprentices who participate in the program for 2 years must receive a high school diploma on completion of the youth apprenticeship.
- At least 60 percent of the youth apprentices who participate in the program for 2 years must be offered employment by the employer that provided the on-the-job training for the youth apprentice on completion of the youth apprenticeship.

## B. Additional Program Outcome Goals

Since 1991, several program revisions have taken place, including the creation of the one-year YA option. In response to these changes and to continue to monitor relevant performance outcomes, the DWD established the following additional program outcome goals:

- At least 75 percent of youth apprentices registered in the program are expected to successfully complete the program and receive a Certificate of Occupational Proficiency.
- Actual student registration at close of the grant should be no less than 85 percent of planned registration.
- At least 60 percent of graduating seniors completing with a Level One or Two YA certificate are expected to be offered employment in an occupation within their training area.

## C. Youth Apprenticeship Program Monitoring

As described in Chapter 2, the Wisconsin Youth Apprenticeship Program is offered throughout the state by regional consortia. Two distinct levels of program monitoring exist to ensure that the statutory and Department-identified goals listed above are met and that the programs operate according to all appropriate policies and guidelines; that to be conducted by the consortia themselves and that conducted by the Department of Workforce Development, Bureau of Apprenticeship Standards staff.

### 1. Regional Consortia Monitoring

Regional consortia, typically through their steering committees, are responsible for developing procedures to monitor their youth apprenticeship programs to ensure that the program and grant guidelines are being followed and that performance outcome requirements will be met. This includes, but is not limited to ensuring that the following are taking place:

- The statewide curriculum guidelines are being followed in the school-based and the work-based learning components of the program
- Meetings between workplace mentors and school representatives are taking place at least three times a year

- Students are meeting academic requirements for high school graduation
- Students are meeting the number of required work-based learning hours
- Students are learning the required skills in the work-based learning component
- Grievance procedures are being followed and grievances are being resolved according to the required timetable

## 2. DWD Monitoring of Regional Youth Apprenticeship Programs

The Department of Workforce Development oversees the operation of regional youth apprenticeship programs through three distinct methods: the annual application process, desk and on-site monitoring, and the review of required performance data.

### a. The Annual Program/Grant Application Process

Consortia seeking to offer the youth apprenticeship program must apply on an annual basis to the Department of Workforce Development, Bureau of Apprenticeship Standards. The Bureau's Youth Apprenticeship section staff develop the application and receive and review completed applications. Chapter 3 includes a description of the grant and links to the current application and guidelines. The program/grant application process provides an initial review of a consortium's steering committee members, budget, and student and employer recruitment plans as well as its programmatic offerings.

### b. On-Site Monitoring

DWD staff reserve the right to conduct on-site monitoring of each approved regional YA consortium. The on-site visit includes a review of many aspects of a consortium's operation, from its financial record-keeping processes to its mentor training and other matters. The visit offers an opportunity to review the consortium's processes and outcomes as well as to discuss best practices and opportunities for improvement.

### c. Review of Performance Data

Youth apprenticeship consortia, through their regional coordinator, are required to submit information to the DWD related to the student, employer, wages, and other data when they register apprentices. This process is described in more detail in Chapter 4. This information, submitted through the Youth Online Data Application (YODA), is then available to the DWD YA staff as a method of reviewing and understanding the performance of each YA consortium and the program generally.

With the creation of the Youth Apprenticeship Participation Dashboard, available from the YA home page, a significant amount of information is available publicly and in an efficient, user-friendly manner. The Dashboard is available at: <https://dwd.wisconsin.gov/youthapprenticeship/yoda.htm>.

Youth apprenticeship staff at the DWD are also available to help regional coordinators develop and utilize specialized performance data reports. State YA staff can be reached at: [ya@dwd.wisconsin.gov](mailto:ya@dwd.wisconsin.gov).



# Appendix A: Youth Apprenticeship Legislation

## Wis. Stat. § 106.13 Youth Apprenticeship Program

(1) The department may provide a youth apprenticeship program. If the department provides that program, the program may include under that program the grant program under sub. (3m).

(2) The council on workforce investment established under 29 USC 2821, the technical college system board, and the department of public instruction shall assist the department in providing the youth apprenticeship program under sub. (1).

(2m) The department shall approve occupations and maintain a list of approved occupations for the youth apprenticeship program. From the appropriation under s. 20.445 (1) (a), the department shall develop curricula for youth apprenticeship programs for occupations approved under this subsection.

(3) The youth apprenticeship program under sub. (1) shall not affect any apprenticeship program that is governed by subch. I, except that an apprenticeship program that is governed by subch. I may grant credit toward the completion of an apprenticeship for the successful completion of a youth apprenticeship under sub. (1).

(3m)

(a) In this subsection:

1. "Local partnership" means one or more school districts, or any combination of one or more school districts, other public agencies, nonprofit organizations, individuals, or other persons, who have agreed to be responsible for implementing and coordinating a local youth apprenticeship program.

1r. "Nonprofit organization" means a nonstock corporation under ch. 181 that is a nonprofit corporation, as defined in s. 181.0103 (17).

2. "Public agency" means a county, city, village, town, school district or technical college district or an agency of this state or of a county, city, village, town, school district or technical college district.

(b) From the appropriation under s. 20.445 (1) (b), the department may award grants to applying local partnerships for the implementation and coordination of local youth apprenticeship programs. A local partnership shall include in its grant application the identity of each public agency, nonprofit organization, individual, and other person who is a participant in the local partnership, a plan to accomplish the implementation and coordination activities specified in subs. 1. to 6., and the identity of a fiscal agent who shall be responsible for receiving, managing, and accounting for the grant moneys received under this paragraph. Subject to par. (c), a local partnership that is awarded a grant under this paragraph may use the grant moneys awarded for any of the following implementation and coordination activities:

1. Recruiting employers to provide on-the-job training and supervision for youth apprentices and providing technical assistance to those employers.

2. Recruiting students to participate in the local youth apprenticeship program and monitoring the progress of youth apprentices participating in the program.

3. Coordinating youth apprenticeship training activities within participating school districts and among participating school districts, postsecondary institutions and employers.

4. Coordinating academic, vocational and occupational learning, school-based and work-based learning and secondary and postsecondary education for participants in the local youth apprenticeship program.

5. Assisting employers in identifying and training workplace mentors and matching youth apprentices and mentors.

6. Any other implementation or coordination activity that the department may direct or permit the local partnership to perform.

(c) A local partnership that is awarded a grant under par. (b) may not use any of the grant moneys awarded to provide funding to a business that is operated for profit or to a nonprofit organization that represents business interests.

(d) The amount of a grant awarded under par. (b) may not exceed \$900 per youth apprentice. A local partnership that is awarded a grant under par. (b) shall provide matching funds equal to 50 percent of the grant amount awarded.

(e) The following outcomes are expected of a local youth apprenticeship program that is funded under par. (b):

1. At least 80 percent of the youth apprentices who participate in the program for 2 years must receive a high school diploma on completion of the youth apprenticeship.

2. At least 60 percent of the youth apprentices who participate in the program for 2 years must be offered employment by the employer that provided the on-the-job training for the youth apprentice on completion of the youth apprenticeship.

(5) The department shall promulgate rules to administer this section.

History: 1991 a. 39; 1993 a. 16, 339, 399, 437, 491; 1995 a. 27 ss. 3703 to 3712, 9130 (4), 9145 (1); Stats. 1995 s. 106.13 1997 a. 3, 27, 79; 1999 a. 9 ss. 2016 to 2024, 2068; 2001 a. 16; 2003 a. 33; 2005 a. 25; 2009 a. 291; 2015 a. 55, 348.

# Appendix B: Contact Information

## Department of Workforce Development Bureau of Apprenticeship Standards

Mailing Address: P.O. Box 7972  
Madison, WI 53707-7972

Office Location: 201 E. Washington Avenue, Rm. E100  
Madison, WI 53703

### **Youth Apprenticeship**

Email: [ya@dwd.wisconsin.gov](mailto:ya@dwd.wisconsin.gov)

### **Registered Apprenticeship**

Staff names and phone numbers can be found at:  
<https://dwd.wisconsin.gov/apprenticeship/contacts.htm>

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## Department of Workforce Development Bureau of Labor Standards

Email: [erinfo@dwd.wisconsin.gov](mailto:erinfo@dwd.wisconsin.gov)

Staff names and phone numbers can be found at:  
<https://dwd.wisconsin.gov/er/contacts.htm>

### Madison Office

Phone: (608) 266-6860

Mailing Address: P.O. Box 8928  
Madison, WI 53703-8928

Office Location: 201 E. Washington Avenue, Rm. A100  
Madison, WI 53703

### Milwaukee Office

Phone: (414) 227-4384

Mailing Address: P.O. Box 7997  
Madison, WI 53707-7997

Office Location: 819 N 6<sup>th</sup> Street, Rm. 723  
Milwaukee, WI 53203

## Department of Workforce Development Workers Compensation Division

Email: [WCINS@dwd.wisconsin.gov](mailto:WCINS@dwd.wisconsin.gov)

Staff names and phone numbers can be found at:  
[https://dwd.wisconsin.gov/wc/about\\_us/direct.htm](https://dwd.wisconsin.gov/wc/about_us/direct.htm)

### Madison Office

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