
MEMORANDUM

June 8, 2020

To: Governors' Offices
From: Bill McBride, Executive Director
Re: Adjustments to Work-Based Learning in Response to COVID-19

Summary

Education and training programs across the country have been interrupted as a result of the coronavirus (COVID-19). Work-based learning programs such as apprenticeship, internship, and career and technical education (CTE) connects on-the-job learning (OJL) with related technical instruction (RTI). This memo looks at how states are regulating work-based learning programs during the crisis while many instruction sites, both in the classroom and at the workplace, are closed. It looks at what states are doing to regulate the RTI and OJL components of work-based learning programs and assure financial stability to individuals who were previously relying on wages received as part of their interrupted OJL experience.

Federal Efforts to Simplify RTI Requirements in a Pandemic

On March 16, the U.S. Department of Labor Office of Apprenticeship released Bulletin 2020-51, "[Flexibilities Available for the Delivery Method of Related Instruction](#)." This Bulletin was released to allow *registered apprenticeship* sponsors the needed flexibility to move instruction to online in order to avoid the spread of COVID-19. Rather than immediately requiring a formal approval process (outlined in Bulletin 2010-13) to change the method of instruction, sponsors and partners must only notify the Office of Apprenticeship within 10 business days regarding new uses of online RTI in their programs. However, the partners must adhere to the formal approval process within 60 days of the change.

State Efforts to Regulate RTI and OJL Requirements in a Pandemic

Related technical instruction (RTI) often takes place in a classroom, often on a community or technical college campus, and OJL on the work site. However, many education institutions and companies are closed either because of infection or the risk of spreading infection. As a result, work-based learning agreements that require a certain number of hours in the classroom or on the worksite may need to be reconsidered.

Schools and employers are attempting to be creative and flexible to continue the participants' work-based learning experiences. In most cases, the exact details of how the work-based learning requirements are fulfilled during a pandemic is a local decision made in partnership with the participant, parents and/or caregivers, education institution leadership and employers. The following are ways that states can help to guide this process:

- **Iowa** released [guidance](#) for community college leaders during this time, including a section on *work-based learning* that encourages review on a case-by-case basis while taking institutional liability into account.
- The **Minnesota** Department of Labor and Industry acknowledges the disruption of *apprenticeship* programs as a result of COVID-19 and [released](#) guidelines for training providers to address future continuity of the training. Guidelines request that training providers record suspension of the program, apprentices impacted by the suspension, and propose program solutions. Creative solutions proposed include extending the training cycle, extension of the term of the apprenticeship, allowing for make-up of missed hours later in the year, and e-learning.
 - The Minnesota Department of Education also published [guidance](#) on work-based learning programs in the time of the state's stay-at-home order.

- **North Carolina's** ApprenticeshipNC [created a webpage](#) on “Frequently Asked Questions about COVID-19 and Apprenticeship.”
- The **Oregon** Nursing Board provided flexibility for nursing clinical hours and experience when *clinical practice* is required. This flexibility was also extended to [nursing assistants](#) in response to the COVID crisis.
- The **Wisconsin** Department of Workforce Development [posted](#) a “COVID-19 Emergency Policy Change” for current *youth apprenticeship* program operations. It includes significant flexibility for program sponsors to reduce the number of minimum hours required for RTI and OJL. Coordinators are also given an extended deadline to submit their end-of-program paperwork.
- States can [consider](#) releasing guidance on implementing social distancing in programs that necessitate *hands-on learning*, either by moving into larger rooms for more space or by splitting sections so that there are fewer students in the classroom at once. Some institutions are sending home materials with students so that they can continue to grow their skills at home.
- See the [FAQ on Meeting the Needs of English Language Learners in an Online Learning Environment](#) geared at reducing inequity in access.
- **New York State Education Department** has issued [guidance](#) on earning course credit and meeting unit of study in work-based learning programs where any student who achieves the learning outcomes for the course should earn the applicable course/diploma without regard to 180 minute/week unit of study requirement in regulations.
- **California** Governor announced a [cross-sector partnership](#) to support transition to distance learning programs and bridge digital divide.
- **Kentucky** published a [short FAQ sheet](#) on matters of continuation of and awarding grades in work-based learning programs.
- Governor Gretchen Whitmer and State Superintendent Michael Rice of **Michigan** issued a [memorandum](#) that includes the requirements of work-based learning during school closures.

State Efforts to Financially Support Individuals No Longer Receiving OJL-Related Pay

Some work-based learning experiences pay participants for their contributions to the workplace during the OJL portion. For example, employers are required to pay apprentices in registered apprenticeship programs. During the COVID-19 crisis, many employers are having to close their businesses either temporarily or permanently. Work-based learning participants that were previously paid by these employers may no longer receive their pay as a result. If employers put participants “on hold” they are not eligible for unemployment insurance. If this continues longer and employers are unable to pay during the pause, employers/institutions may want to encourage layoffs so that participants can get unemployment insurance in the meantime. Counseling apprentices on how to apply for unemployment insurance will become important. Please note that there are a variety of work-based learning experiences and certain actions are only applicable for certain types of work-based learning. The following are examples of ways that states are seeking to prevent a loss of income for these participants:

- **Texas** Governor Abbott [will waive regulations](#) to make sure funding would continue to support *college work-study programs*. College work-study is not necessarily a work-based learning experience, but it can be. The waiver allows institutions to continue paying students for hours they would have worked had they been able to continue. The waiver does not provide any additional funding for the program. It simply allows institutions to continue using the funds they have received for the program to disburse to students.
- **Washington** created a [step-by-step guide](#) for *registered apprentices* to apply for unemployment insurance.

State Efforts to Continue Supporting Work-Based Learning Participants



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Work-based learning also provides participants with mentorship, career exploration, soft-skills training. The following are examples of efforts states and programs are taking to continue these services virtually.

- Program leads are using a variety of techniques to “check-in” with current and past apprentices, including emailing, text messaging and calling.
- CareerWise **Colorado** is expanding technology to allow for virtual learning and *apprentice* support. CareerWise is conducting virtual assistance on resume development and interview practice. A participating company, JPMorgan Chase, has a hiring freeze for all participants except for youth apprentices, and interviews are continuing virtually.
- **Oklahoma’s** Office of Workforce Development is [hosting a webinar](#) to share how employers and apprenticeship program sponsors can support apprenticeship programs through online learning and training in response to the crisis.
- **Washington’s** Career Connect Washington – the state’s work-based learning initiative – launched [CareerConnect@Home](#), a platform where students in grades 7-12 can learn from employers about different careers and potential employers.

State Efforts to Adjust CTE Upon Reopening

As states slowly reopen, educational institutions will be facing a new landscape of in-demand jobs and industries, many of which will utilize work-based learning components.

- The Office of Community College Research and Leadership at the University of **Illinois** at Urbana-Champaign released a guide on resources for institutions on [Addressing Challenges in the CTE Classroom and Workforce](#). This guide discusses the challenges community colleges are wrestling with in delivering quality CTE programming amidst the pandemic and offer suggestions for how institutions can navigate these challenges.
- Lone Star College in **Texas** is [working](#) with the state and governor’s office to identify programs critical to the workforce pipeline, and to complete labor market studies to determine which programs are most needed. These programs will be prioritized in plans for reopening.
- States can consider releasing guidance on implementing public health guidance in the classroom and at worksites, such as implementing social distancing and other disinfecting and increased cleaning procedures.

Additional Resources to Support Work-Based Learning in Response to COVID-19

- [SkillsCommons](#) supports classroom instructors and industry trainers and can lead to reduced costs for students. SkillsCommons has been developing their online course material into an e-academy, including instructor trainings and over 350 open courses integrated with blackboard.
- [Association for Career & Technical Education](#) developed a website for those adjusting career-and-technical education amid COVID-19. The website includes [CTE Learn](#), which are 150 self-paced courses for CTE professionals, free resources, federal guidance, and online webinars.
- [Advance CTE](#) developed a website to share resources and updates to aid in the delivery of high-quality CTE virtually.
- The [American Association of College of Teacher Education](#) recommends that states identify opportunities for teacher candidates to continue their contributions to the educational advancement of students, including those with disabilities (e.g. clinical practice opportunities or paraprofessionals in temporary positions) for the duration of the impact of COVID-19 on state school systems.
- A [coalition of CTE](#) organizations have partnered to form a newly-formed central portal where instructors and students can go to access much needed resources including hundreds of online classes, videos and instructional materials in areas such as machining, welding, mechatronics, industry 4.0 and programming.
- The U.S. Department of Labor developed a [grants management FAQ](#) to address questions related to Coronavirus to help state and local workforce leaders and other stakeholders to assist the



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public workforce system during this crisis. Several USDOL grants focus on apprenticeship and there may be information in here to help program staff.

For questions or concerns related to the contents of this memo, please contact NGA staff:

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