New York State
Apprenticeship Training Program
Process Mapping Report

An Internal Review of the Program

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Work Flow Process Maps, Focus Group Findings, Conclusions and Recommendations
Part I

Work Flow Process Maps, Focus Group Findings, Conclusions and Recommendations – Part I

On August 28, 2007, the former Governor Eliot Spitzer announced a moratorium on the development and approval of apprenticeship training programs in all trades, including the addition of new participating employers to existing programs, and ordered a thorough review of the Apprenticeship Training Program. During this moratorium, staff in the Division of Workforce Development and Training was charged with reviewing the Apprenticeship Training Program in order to map out the process of the program's work flow.

New York State's Regulations Governing the Registration of Apprenticeship Programs and Apprentices ensure that apprenticeship training programs "are of the highest possible quality in all aspects of on-the-job training and related instruction and that all apprentice training programs provide meaningful employment and relative training for all apprentices." It is with this statement of purpose in mind that the program review was conducted.

Staff reviewed the Apprenticeship Training Manual, the Sponsor's Handbook, the Internal Audit Review issued in 2004, among other documents, and then developed a work plan to review the flow of work processes.

Focus group discussions were held with all field and central office staff. These discussions covered the following topics: Developing and Registering New Apprenticeship Training Programs, Marketing, Monitoring, Recruitment, Registration, Completions, and the Database. The goal of the focus group dialogues was to gather information so as to map out the work process for the major activities of the apprenticeship program. However, in addition to providing work flow processes, the information resulting from the focus groups included insights and suggestions that may be utilized to improve the quality of the program.

This report will provide an overview of each topic area by providing a map and description of the current work flow process, a summary of the focus group discussions, the impact the current process has on the program and comments or suggested recommendations for that particular topic. It should be noted that the recommendations and conclusions are based upon the summary of information gathered and should not be viewed as negative comments about the apprenticeship program or its staff.

Upon analysis of the discussions, it is evident that the following issues have a key impact on the program:

- The Apprenticeship Training (AT) program needs a Director whose role is to: review and advance program policy and procedure, facilitate relationships with partners, and provide vision for staff, including development of a statewide marketing strategy that is integrated into the overall Workforce New York marketing campaign.
- The AT program needs to be a more-widely understood part of New York's workforce development system demonstrating that apprenticeship training is a viable

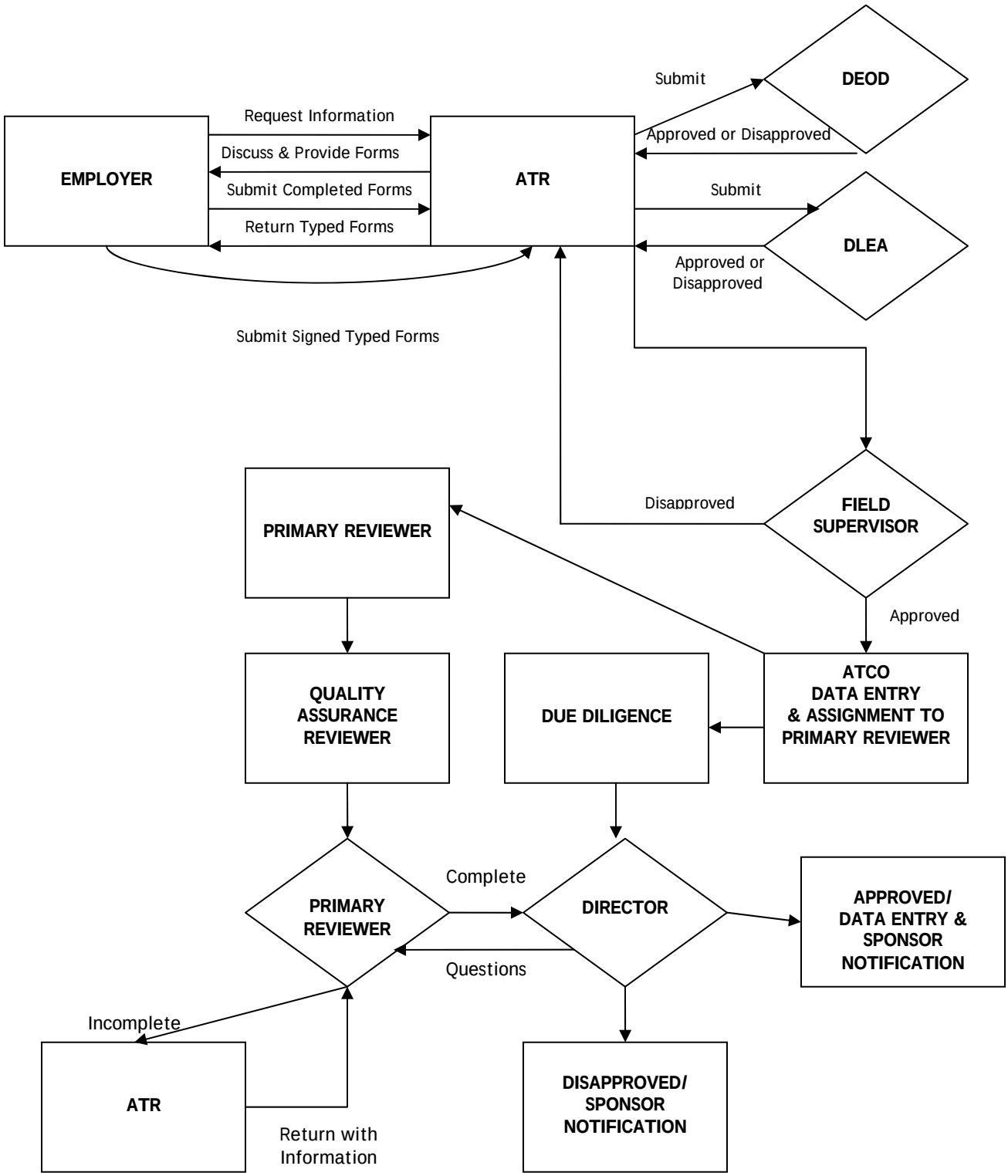
workforce development tool; there should be an AT connection to the One-Stop Centers across the state.

- Proper staffing is needed in both the regional areas and in the Apprenticeship Training Central Office (ATCO) in order to adequately address the needs of the program.
- The processing of paperwork needs to be brought into the 21st Century by exploring electronic accessibility to fill-able forms, application submittal and utilization of electronic signatures.
- Staff capacity needs to be continually enhanced to ensure staff are not just acting as program monitors but are ambassadors for AT programs in the local regions. Cross training of staff also needs to occur to ensure that the ATCO operates efficiently.
- ATRs need to be proactive in promoting apprenticeship across all industries and occupations in New York State.
- Procedures need to be revised to ensure that monitoring visits are not done merely due to the passage of time but are done in response to prior issues, size of the program and number of apprentices in training.

Also attached to this document are the topics identified to be researched further by a consultant (Attachment A) and the final suggestions offered by AT staff which they believe to have the greatest impact on the quality of the Apprenticeship Training Program (Attachment B).

In summation, the Apprenticeship Training program's goals should drive policy, procedure and processes; each step should add value. Inefficiencies in the current program implementation may be addressed through adequate training, use of technology and delegation of authority to review and approve certain aspects of the program.

Developing & Registering New Apprenticeship Training Programs



Developing and Registering New Apprenticeship Training Programs

Overview of the Process Map

- Requests for information to participate in an apprenticeship program are generated by: an inquiry from a prospective employer or apprentice, an Apprenticeship Training Representative (ATR) following leads, making a 'cold call', or reaching out to potential sponsors.
- ATRs refer interested parties to the website, mail them a packet of information, or respond by phone or in person to explain program goals and requirements.
- The ATR eventually either mails or hand delivers an information packet to the employer. The employer reviews and completes the forms and returns them to the ATR. (The ATRs described this process as taking anywhere from one to three meetings before the potential sponsor's application is ready to be mailed or picked up by the ATR for review.)
- The ATRs review the competed application and may have it typed before returning it to the employer for signature.
- The employer then signs and submits the formal application to the ATR for processing.
- The ATR submits the Affirmative Action Plan to the New York State Department of Labor (NYSDOL) Division of Equal Opportunity Development (DEOD) office for review and approval. At the same time, the ATR submits the application to the New York State Education Department (NYSED) Designated Local Education Agency (DLEA) for review and approval.
- After receipt from both DEOD and DLEA, the completed application is then submitted to the field supervisor for review. If approved, it is then transmitted to ATCO. If it is not approved, then it is returned to the ATR to obtain additional information from the sponsor.
- ATCO logs in the application into a pending database, assigns the application to a Primary Reviewer, and sends a form letter to the potential sponsor indicating that the application is under review. General information about the pending application is then uploaded to the NYSDOL website.
- Staff conducts due diligence checks and gives the findings to the AT Director.
- The Primary Reviewer reviews the application to determine if the forms received are complete and acceptable and identifies deficiencies and documents any recommended corrective action on the application review guide.
- The application is then given to a Quality Assurance Reviewer who also reviews the application to determine if the forms are acceptable and identifies deficiencies and any recommended corrective action on the application review guide.
- The application is then given back to the Primary Reviewer who either returns the application to the ATR seeking additional information and/or clarification, or submits the application to the Director for approval.
- The Director thoroughly reviews the application, including the results of the due diligence investigation, and relays any questions to the Primary Reviewer. The Director determines if the application is approved or disapproved and notifies the applicant accordingly.
- Once the application is approved and signed by the Director, it is issued a sponsor code and AT code and data entered into the main database.

Focus Group Findings

- Applications are not processed in a timely manner. Applications previously were processed within 4-6 weeks; now applications are reported to take anywhere between 5 and 24 months for approval, with the average minimum time of 7 months.
- Errors in submitted application forms appear to be process errors which most often do not impact on the ability to approve an application or on the quality of the program.
- ATRs and Field Supervisors submit applications with a recommendation to approve or disapprove. They stated that their recommendations are generally upheld after going through the Primary Review, Quality Assurance Review and Director's Review.
- Field staff indicated that the DLEA often holds up the processing of applications due to failing to identify suitable Related Instruction.
- Field staff indicated that the recent policy that requires DEOD reviews occur prior to submittal to ATCO also holds up the processing of applications. Previously, applications were submitted to ATCO and DEOD simultaneously, which expedited the process.
- Field staff indicated that the process is further held up by the comprehensive ATCO review process.
- ATCO staff indicated that applications submitted by the field staff are incomplete and sometimes illegible, whereas field staff indicated that for the most part they submit complete and approvable application packages.
- ATCO staff indicated that the bottle neck for approving applications lies with the final approval from the Director.
- There is no feedback to ATRs on long-term pending applications.
- Both the potential apprentice and the potential sponsor take risks while applications are pending. (ie., such as commitment and payment of Related Instruction)
- For new Joint Apprenticeship Committees (JACs) Programs, every member is required to complete the Sponsor Information Sheet (AT9 form), even those employers who do not have apprentices, which further holds up the application process. Due diligence is conducted on every employer in the new JAC.

Impact on the Program

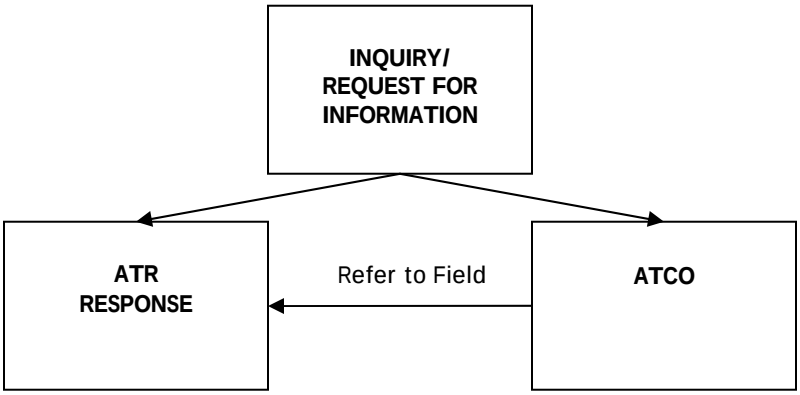
- The time period to register a new sponsor and program is not business friendly. The time delays and risks that employers take while waiting for their application to be approved could potentially cause disinterest in participation by employers, including those representing new industries and trades.
- The relationship with the DLEA and AT staff in many areas is tenuous. Some DLEAs fail to identify Related Instruction in a timely manner which contributes to the delay in processing and approving new applications.
- The new procedure that requires ATRs to obtain DEOD approval prior to submitting the application to ATCO contributes to the delay of processing and approving programs.

Conclusions/Recommendations

- The length of time it takes to approve an application is unacceptable.

- There needs to be a way to track the pending application workflow through the database so that all staff is aware of issues/problems that are causing the delay.
- Technology needs to be used to expedite the submittal and processing of applications.
- The use and legal implications of electronic signatures needs to be investigated.
- The number of reviewers examining the application does not add value to the process. It was found that the initial evaluation of an application could project its success: i.e., applications that were completed and recommended for approval, eventually were approved, contingent upon the outcomes of the due diligence process.
- The relationship with the DLEAs needs to be improved, especially in the New York City area.
- The submittal of information to DEOD needs to occur simultaneously rather than sequential to the ATCO submittal.
- When approving a new sponsor's application, it was found that the following issues are critical: the due diligence process, a fair recruitment process and affirmative action plan, the site visit to ensure the sponsor's ability to provide the training in a safe setting, and identification of Related Instruction.

Marketing


INQUIRY/
REQUEST FOR
INFORMATION
ATR
RESPONSE
Refer to Field
ATCO

Marketing

Overview of the Process Map

- Employers, Unions or educational entities request information and/or request an appearance of AT staff at an event.
- The ATCO and ATR supervisory staff refers the request to the local ATR who responds to the request.

Focus Group Findings

- There is no statewide marketing strategy; all of the marketing that is being done is driven by local need, the amount of time available, staff initiative, and staff's relationship with partners.
- Marketing only occurs in response to inquiries and focuses on potential apprentices; marketing is not pro-active to new employers or new trades. ATRs spend the majority of their time on monitoring and estimate that they only spend about 5% of their time marketing.
- AT presence in the One-Stop System is not consistent across the state. The AT program connections with the LWIB and One-Stop System are based on the local ATRs' relationships with the One-Stop staff and/or the ATRs' need to have a work station when in the field. When a One-Stop customer inquires about AT programs, some center staff generally directs customers to call the local ATR.
- Marketing materials were viewed inconsistently among staff. In general, comments pointed to weak marketing materials.
- Youth marketing materials were viewed as not being contemporary enough to attract youth customers.
- Job fair displays are limited and shared among staff but are not always available when needed.
- There is no "official" presentation package that conveys a statewide marketing message for AT. Presentations that are used are made on an as-needed basis and their development is based on the skills of ATR staff, which are inconsistent across the state.
- Labor market data and the expertise of the local labor market analyst are minimally used to connect to demand industries or new businesses within the AT program.
- ATRs rely on their involvement in the local community to know about new businesses moving in by reading newspapers, television and radio media, etc. and expressed that their community ties/presence are advantageous to program implementation.
- When marketing does occur, staff has generally been targeting traditional trades and occupations.

Impact on the Program

- The AT program does not have an identity. Without a statewide marketing strategy, AT lacks a consistent message.
- Due to the limited marketing activities, and primarily marketing to traditional occupations and industries, the program fails to sprout trades in new hi-tech fields.
- One-Stop staff are not fluid on the process of how customers apply to become an apprentice candidate or how businesses can become registered sponsors of

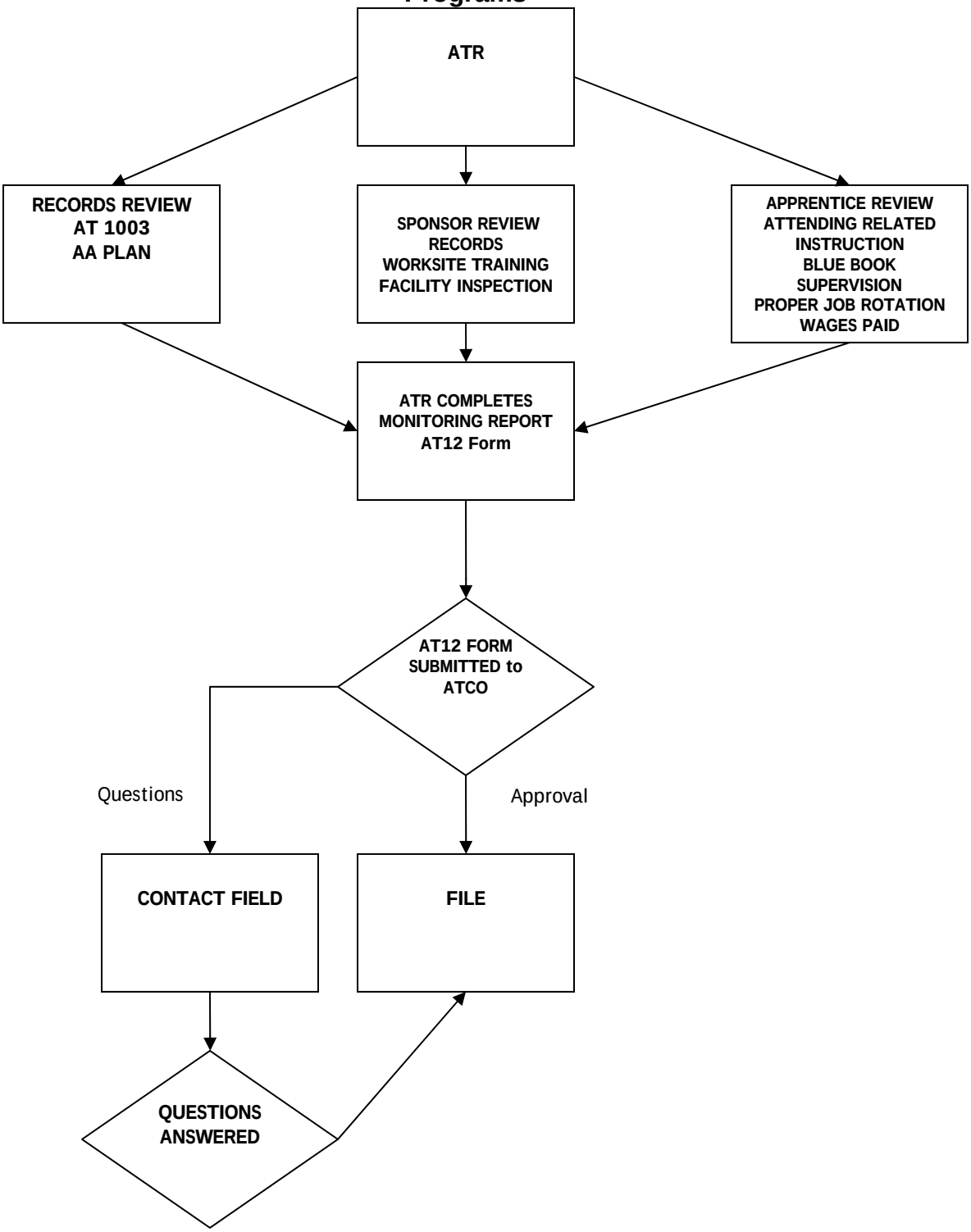
apprentice training programs. Rather than refer customers to the website, job order, or the recruitment notice and provide ATR contact information, candidates and businesses are often simply referred to their local ATR.

- Limited and unconnected marketing strategies impact the number of customers, particularly youth, who may benefit from an apprenticeship training program.

Conclusions/Recommendations

- A statewide marketing strategy is needed to ensure that all ATRs are providing consistent information to achieve the goals of the program. The message should have an overarching theme that can be refined based on local needs and local labor market data.
- Current marketing includes activities such as job fairs, Career Technical Education Days and attendance at conferences. However, marketing should be pro-active rather than reactive; ATRs should promote the AT program by conducting presentations to partners such as high schools, vocational schools, chambers of commerce, trade associations and community-based organizations, as well as market to non-traditional industries such as Green Construction, Nanotechnology, and Biotechnology.
- The AT program needs to have an identity. Marketing materials should include the "Workforce New York Logo". Also, AT program information should be linked to the Workforce New York and Career Zone websites.
- ATRs should build the capacity of the One-Stop System staff by educating staff and partners on the steps to become an apprentice or a sponsor.
- ATRs need a connection to the One-Stop Centers for system building activities.
- In order to equate the AT program as the "other four-year degree", marketing materials for youth need to be comparable to materials used by colleges in their quality, interest, and explanation of outcomes and benefits.
- By having a clear connection with the One-Stop Center(s), when an employer's training program does not match the time requirements of the ATP, the ATR may refer the employer to the One-Stop Center for programs such as On-the-Job Training (OJT) to ensure seamless services for the employer.
- All ATRs should become a "partner" in the local workforce system and participate in meetings, such as local business service teams, when appropriate.
- Staff capacity building for ATRs should include presentation skills and use of "prepared" presentations to enhance the ATRs ability to market the program.
- ATRs should connect with community-based organizations to educate non-traditional partners who serve participants such as women, minority and youth, about the AT programs.

Monitoring Apprenticeship Training Programs



Monitoring Apprenticeship Training Programs

Overview of the Process Map

- Each sponsor is monitored twice a year at approximately six month intervals.
- The ATR reviews both the AT 1003 and the AA Plan prior to making a monitoring visit. The AT 1003 listing of active apprentices is used during monitoring to verify that all apprentices who should be registered are registered, apprentices who have left the program are no longer active on this roster, and apprentice data and information is correct. The AA Plan is reviewed to make sure it is a current plan and meets the needs of the sponsor.
- A site visit is made to the sponsor to review their records and worksite training facilities.
- The AT 1003 is corrected by the sponsor, independently or jointly with the ATR.
- The ATR meets with apprentices on an individual basis to gather information about the program and to ensure proper worksite rotation, supervision, and wages are in place and to note progress with Related Instruction.
- The ATR documents monitoring findings on the AT 12 and submits to ATCO.
- Monitoring may be informal (unscheduled), i.e., following up on a complaint regarding a sponsor, but is usually scheduled.

Focus Group Findings

- The following are key issues that drive monitoring/interviewing the apprentices:
  - status of apprentice,
  - proper worksite rotation,
  - attendance at Related Instruction,
  - stipulated wages paid,
  - completion of Blue Book,
  - and safety and supervision on the job.
- The following are key issues that drive monitoring the sponsor:
  - proper supervision for the apprentice,
  - evaluation of apprentice progress,
  - safety of the apprentice,
  - affirmative action and non-discrimination,
  - and properly conducted recruitment.
- The amount of time ATRs spend on monitoring is affected by the overall workload of the ATR and the number of large programs scheduled for monitoring. Monitoring is generally conducted in a series of visits, numbering from one, to as many as ten or more, as determined by the ATR.
- The number of visits correlates to the monitoring approach or philosophy of the ATR and what the ATR deems necessary to ensure a quality program.
- Not all program sponsors use Blue Books.
- Monitoring report findings are inconsistently documented on the AT 12. ATRs handle issues on the spot. Some discuss issues only verbally with the sponsor or apprentice and will follow up at a later date. Some will include these issues in their monitoring reports, others will not include the issues in this report but will follow up on the issue at a later date or in their next monitoring visit. It appears that ATRs

generally elevate issues to ATCO only when the issues are persistent or egregious. If/when formal corrective action is required, direction appears to come from ATCO.

- AT 12 monitoring forms are received in ATCO, the Reviewer reviews a copy of the report and the original is filed in the sponsor folder.
- Monitoring activities consume 45% – 80% of all ATR time.

Impact on the Program

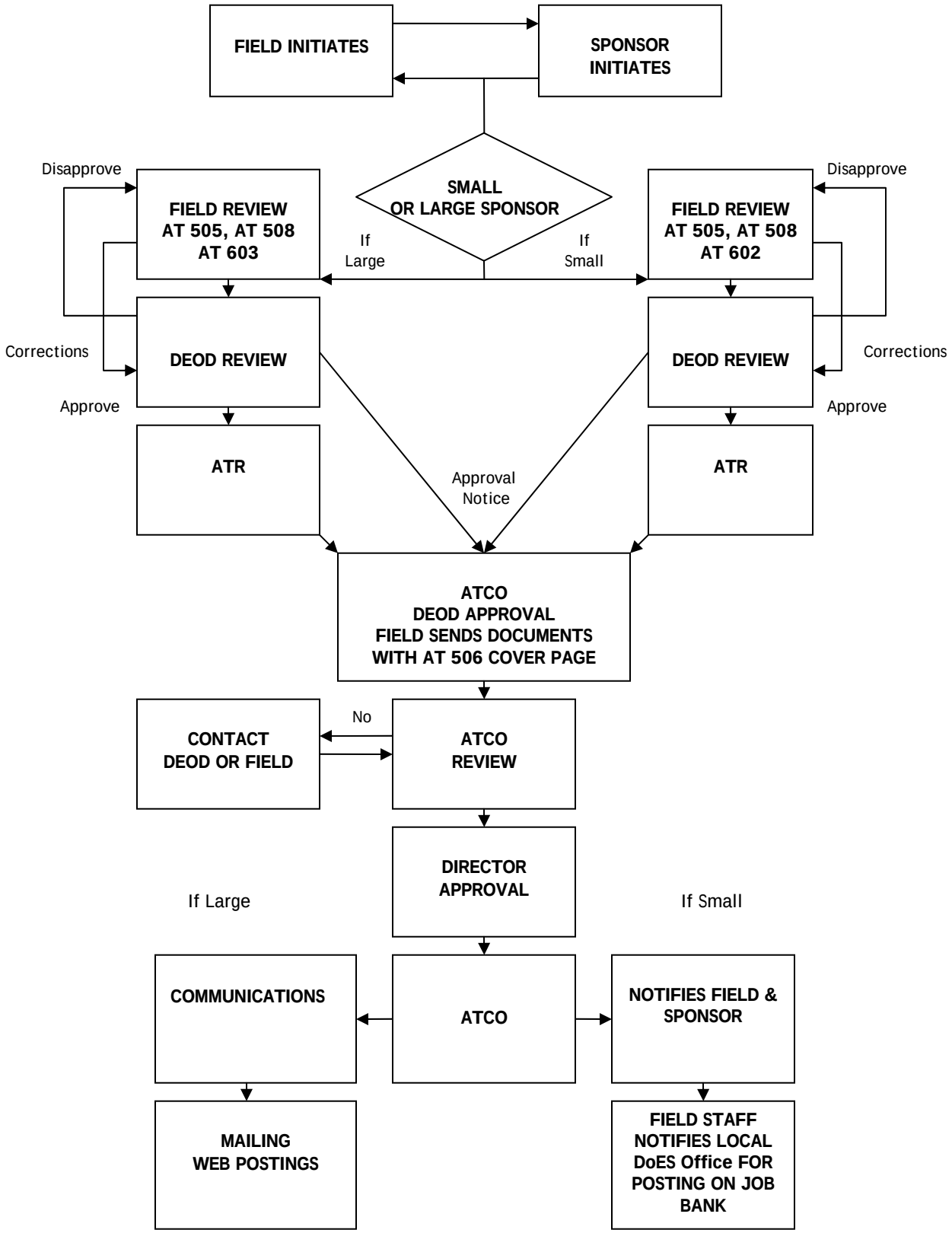
- Monitoring consumes the majority of an ATR's time, thus diminishing time for other apprenticeship activities. AT procedures provide a range for the number of apprentices required to be seen during a monitoring visit, based upon program size. However, many ATRs attempt to see each apprentice once a year to ensure successful outcomes. Some ATRs have a case management approach to conducting monitoring while others have more of a facilitator approach. The "case management" approach emphasizes monitoring apprentices for success – seeking worksite, related instruction, wage information from the apprentice and providing encouragement and guidance. The "facilitator approach" combines monitoring the sponsor's operation of the program and interviewing a sample of apprentices. This approach assumes the sponsor is ultimately accountable for apprentice outcomes and program success.
- Because the ATCO Reviewer of the monitoring reports is looking only at a copy of the current AT 12, it is unclear if the Reviewer has sufficient information to evaluate the outcome of the monitoring visit since prior monitoring reports are not taken into consideration.
- There is a constant updating of apprentice data from the corrected AT 1003, while the sponsor's implementation of the program appears to remain constant.

Conclusions/Recommendations

- The role of the ATR as monitor requires clarification as it is interpreted differently across the state. This individual interpretation dictates the amount of time spent on monitoring. Is the ATR role one of case manager *(who meets with each apprentice during monitoring to assure successful individual completion)* or is it facilitator/technical assistance provider *(who interviews a sample of apprentices to assure both the sponsor's and the apprentices' compliance with program standards)*?
- All ATRs should be conducting monitoring in the same fashion. Data indicates that apprenticeship programs across the regions of the state have fairly similar outcomes with respect to numbers of apprentices who complete/do not complete the program, regardless of the intensity of the monitoring provided in that region.
- Blue Books are not consistently used across all programs. Are they considered efficient tools or antiquated tools? Are any other states using technology to more efficiently track job rotation and worksite training hours?
- The AT 12 form needs to be revised to provide documentation of the verification methods used for monitoring, as well as to identify observations, findings, recommendations and/or the need for corrective action plans. Consideration should be given to making the AT 12 form electronic with the data automatically transferred into the database system and linked with the sponsor record.

- There needs to be consistency in how corrective action issues are addressed, i.e., verbally or in writing.
- ATCO Reviewers of monitoring reports should have the ability to easily compare previous reports to current AT 12 reports.
- It might be beneficial to have a systematic way to flag a sponsor in the main database when there are outstanding or egregious program issues as noted via the monitoring report.
- ATCO staff spends time making changes to the database which could be done in the field to expedite processing.
- Sponsors are monitored twice per year regardless of whether they have new or old programs, whether the program history is excellent or problematic, whether there are large or small numbers of apprentices. More emphasis and consideration might be given to developing a list of factors and outcomes that would determine annual monitoring needs.

Recruitment for Apprenticeship Training Programs



Recruitment for Apprenticeship Training Programs

Overview of the Process Map

- Recruitment is the public process by which apprentices are identified for possible indenture into an apprenticeship program.
  - Public recruitment for a small sponsor entails DEOD approval and listing the job order with the Department of Labor, and placing notices with local newspapers, radio stations, community organizations, etc.
  - Public recruitment for a large sponsor requires submittal of documents to DEOD and DOL for approval to conduct an area-wide recruitment.
- Sponsors may initiate recruitment requests; ATRs may inquire about the sponsor's need to recruit apprentices.
- Recruitment requests and required documents should be submitted 60 days prior to the recruitment dates.
- ATRs assist sponsors in the completion of the required forms.
- ATR role:
  - For sponsors with four or fewer apprentices, the ATR determines that the Minimum Qualifications and Selection Standards are up to date on the AT 505 and the Selection Standards and Evaluation are up to date on the AT 508. The AT 602 non-discrimination policy statement is also reviewed.
  - For larger programs, the ATR assists the sponsor with the AT 505 and 508 and assures that the AA Plan is current. The ATR will assist the sponsor in developing a new AA Plan, AT 603, when necessary.
- Recruitment forms are sometimes reviewed by regional AT supervisors.
- Recruitment forms are sent to DEOD staff in Buffalo for review and approval.
- After DEOD approval, recruitment forms are returned to the ATR with a copy sent to ATCO for staff review; currently one ATCO person handles this task.
- ATCO sends recruitment information to the DOL Communications Office for posting on the AT website. One ATCO staff person works with Communications.

Focus Group Findings

- Sponsors do not always request to conduct recruitment efforts in a timely manner; providing 60 day notice of a planned recruitment to the ATR is not always achieved.
- There is no automatic tickler file to notify ATRs that an AA Plan has expired or that a recruitment cycle is coming up.
- Updating and or completing new At 505, AT 508 and AA Plan forms (AT 602 or AT 603) so as to assure fair and open recruitment efforts can be time-consuming for the ATR.
- Once the recruitment forms have been completed, they must first be submitted to DEOD for approval. Forms may not be submitted to ATCO until DEOD approval is secured.
- The process of securing DEOD approval has, in the past, significantly delayed the approval of recruitments. Timeliness of approval has improved of late.
- Website posting occurs two weeks prior to the recruitment taking place regardless of how much lead-time is provided to the Communications Office.
- The testing of apprentices can be an issue in NYC where the recruitment results in large numbers of candidates who must be tested as part of the ranking process.

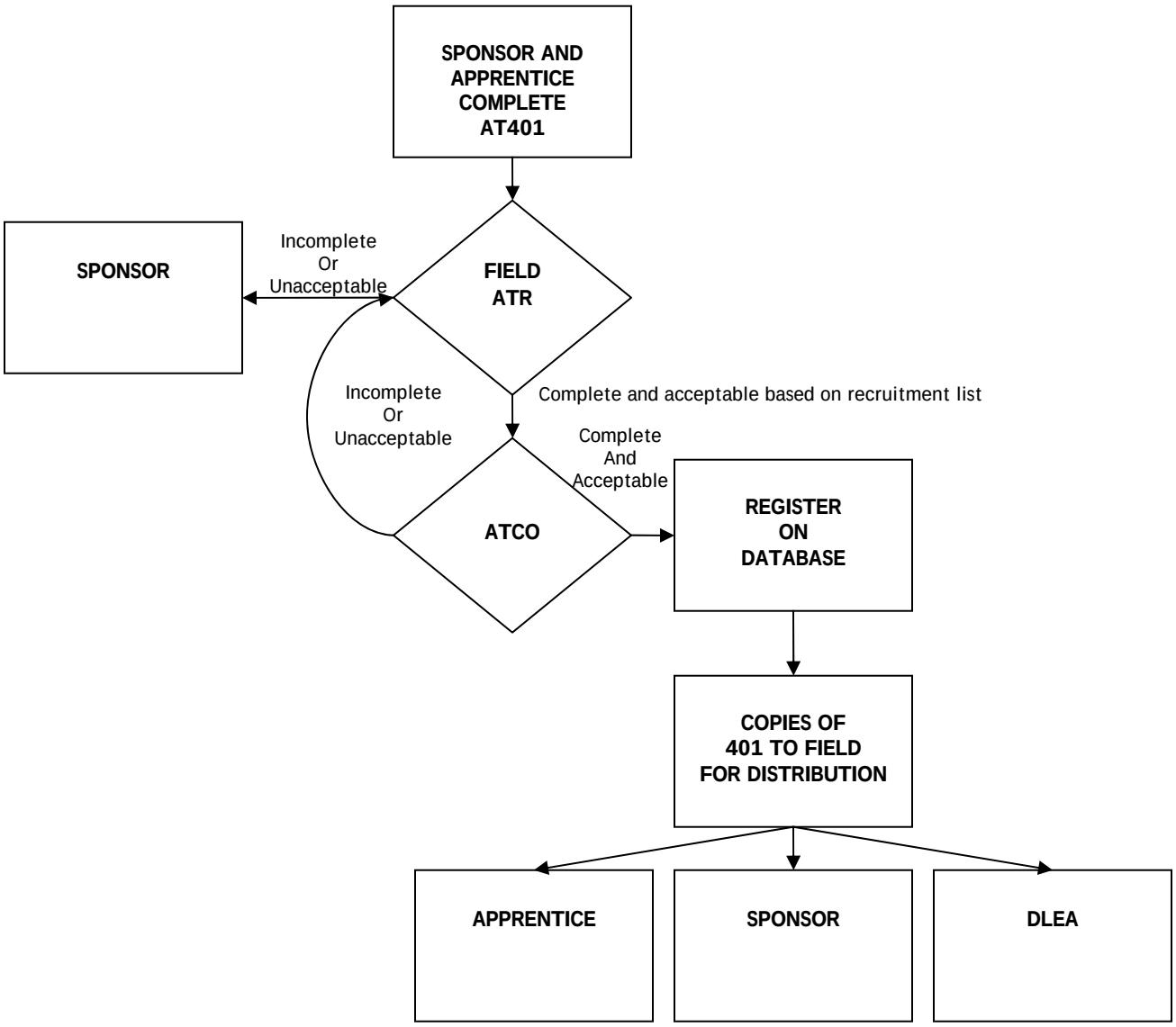
Impact on the Program

- Sponsors who do not provide 60 day notice of recruitment create tight timeframes for DEOD and DOL staff to accommodate the sponsor's chosen recruitment dates and provide sufficient notification to the public.
- Duplicate efforts are expended on the review of recruitment requests (field supervisors, DEOD, ATCO).
- Recruitment approval is delayed by requiring a two-step submittal process first to DEOD, then ATCO.
- Some large program sponsors express dissatisfaction with website postings:
  - Limited public notification of recruitment information, i.e., two-week website posting.
  - One notice is generally posted even when recruitment is occurring in several regions.

Conclusions/Recommendations

- To assist in providing timely recruitment, consider making the following standard database system reports:
  - expiration dates of AA Plans
  - annual or semi-annual recruitment method with last cycle dates
- In addition to the DEOD review, one DOL review should be sufficient.
- Simultaneous submittal of recruitment forms to DEOD and DOL would speed approval process.
- It is suggested that recruitment forms be completed electronically and transmitted via email while ensuring forms maintain legal requirements.
- Agency discussions may be required to ease the testing situation for NYC.
- Website posting should be searchable by region and/or occupation.

Registering an Apprentice



Registering an Apprentice

Overview of the Process Map

- The sponsor and apprentice complete form AT401 in order to initiate the registration process for the apprentice.
- The form is submitted to the field ATR who reviews the form and where necessary, confirms the apprentice is on the recruitment list and attaches the current recruitment list prior to transmitting to ATCO.
- Central Office staff checks to see if the form is complete, checks that the recruitment list is consistent with the one on file and enters the information into the database. Once this step is completed, the form is stamped with the AT program Director's signature.
- The following morning ATCO staff prints out the new data entries and proofs for any input errors. Copies of the signed AT401s are made and returned to field for distribution.
- ATRs distribute approved forms to the apprentice, sponsor and DLEA.

Focus Group Findings

- Only one clerical staff person does all data entry in ATCO.
- Incomplete AT401 forms are returned to field for additional information.
- If a recruitment list is not attached to the AT401, there is no standard response. Sometimes staff call field to follow-up, other times the AT401 is returned.
- Field ATR staff does not consistently compare the AT401's to the recruitment lists and does not consistently attach a list to an AT401.
    - There is inconsistency in providing the ranked list with new AT401s for indenture: some ATRs submit updated lists, some submit partial lists from large-scale recruitment efforts, and others submit an updated list only when notified that the apprentice name cannot be found on the recruitment list filed in ATCO.
- In ATCO, the recruitment lists are maintained in a staff person's desk.
- The New York City region submits a large volume of AT401s completed by apprentices which have been described as often sloppy, incomplete, and unreadable.
- If an application is not promptly processed and a participant is already in training, there is no clear or consistent process for adjusting the program start date and issuing credit for training before registration.

Impact on the Program

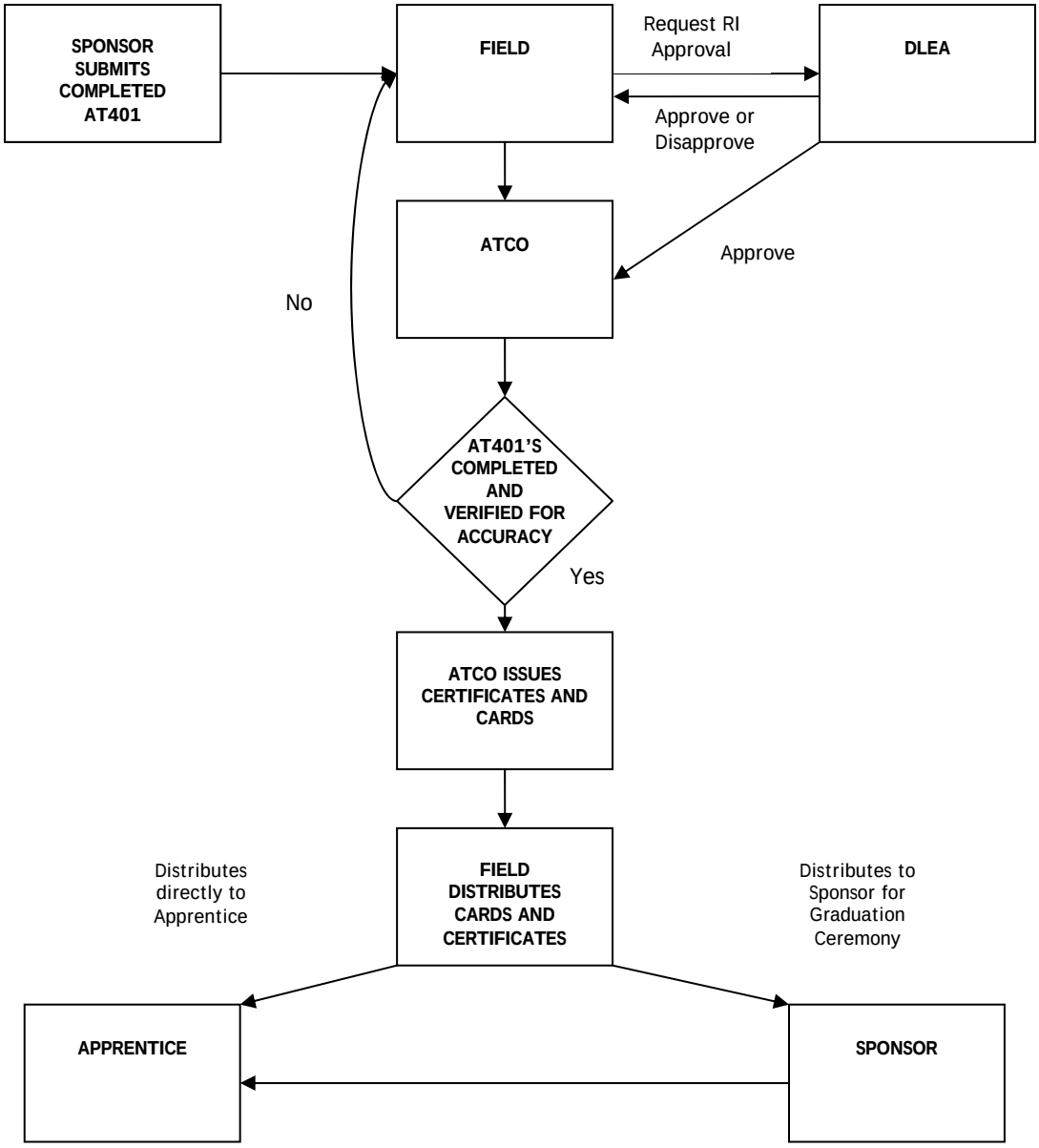
- There is no staff backup support for data input of the AT401s. If staff is unavailable, enrollments will be delayed and the database reports will not be current.
- Returning incomplete AT401s to the field adds additional time delays to the registration of the apprentice.
- Lack of a centralized up-to-date recruitment list contributes to time lost in resolving issues between two different lists (ATCO list and ATR field list).
- Illegible, handwritten AT401's contribute to data input errors.
- Program start dates often need to be changed due to the delayed processing of new applications, thus requiring the need to generate new AT401 forms that include prior experience credit. Granting prior experience of credit when an apprentice has

already been training on the job but the paperwork has not been approved by ATCO, puts the sponsor at risk of paying inappropriate wages if the sponsor places this apprentice on a public work job.

Conclusions/Recommendations

- Staff needs to be cross-trained so that the registration process is not impacted by personnel issues.
- Due to the contractual nature of the AT 401, a thorough supervisory review needs to be completed in the field to ensure the information is correct before being signed by the apprentice and sponsor and forwarded to ATCO.
- Recruitment lists maintained by field and ATCO need to be consistent.
- Registration of AT401's is mainly a data input issue. Fill-able forms and electronic signatures should be investigated which would omit in-put errors due to illegible handwriting and/or submission of incomplete applications. Currently, one full-time clerical staff position is dedicated to the data input of AT401s.
- Expediting the registration process by using electronic or scan-able forms would reduce and/or eliminate the need to adjust program start dates and free up staff time. Consideration could be given to:
  - The ranked recruitment lists be electronically maintained by the sponsor using only the last four digits of the social security number.
  - List of updates be consistently recorded and new lists emailed to the ATR with each new AT401.
  - ATCO could email ATRs to request lists rather than returning AT401s.

Certificates of Completion



Certificates of Completion

Overview of the Process Map

- Once training has been completed, the sponsor signs the AT401 form and submits the form to the field ATR.
- The ATR requests that the DLEA sign-off on the AT401 as well. (Please note that the signatures on these forms do not need to be on the same document but on copies of the apprentice's AT401 form.)
- Once the DLEA signs-off on the form, the form is transmitted to the field ATR with a copy to ATCO.
- Once both of the signed AT401 forms from the Sponsor and DLEA have been received in ATCO, staff reviews the forms to ensure both Related Instruction and on-the-job training have been completed. Certificates and cards are then issued and sent to the field ATR for distribution to the apprentice or distribution to the sponsor, if a graduation ceremony is planned.

Focus Group Findings

- Only one staff person has access to the software and the ability to print certificates of completion and laminated wallet cards.
- Certificates are usually printed in batches of 25.
- The issuance of certificates of completion and laminated wallet cards is often driven by the sponsor's graduation schedule and therefore the demand can be overwhelming for one staff person at times.
- The process to print and laminate cards is time consuming as the lamination process is slow and tedious, but it should be noted that the laminated wallet cards are preferred by the apprentices.
- ATCO no longer has proper mailing supplies to ensure that a professional quality certificate is delivered to the apprentice.
- Many times ATRs hand deliver certificates of completion to apprentices to relay the value the Department places on the success of this program.
- A certificate of completion may not be issued without the signatures from the sponsor and the DLEA on the AT401 form. Often the delay in receiving completed forms is with the DLEA.

Impact on the Program

- The issuance of certificates is dependent upon only one staff person which could potentially cause a major disruption if that individual is not available.
- Delaying the printing of certificates in minimal batches of 25 could cause a delay in the prompt issuance of the certificates and cards if there are fewer than 25 completers at one time.
- Many ATRs noted that employers do not view DOCS certificates and trade certificates as equal and often times require the individual holding the DOCS certificate to complete additional training and/or worksite experience before being considered for full employment.

Conclusions/Recommendations

- Cross-training of staff is needed to ensure that more than one individual can print certificates and laminate cards.
- Running batches makes for an efficient process but could prevent timely distribution of certificates.
- The purchase of a new laminating machine should be investigated. New technological advances might help expedite the certificate/card issuance process.
- Proper packaging materials are needed to insure that certificates and cards arrive in conditions suitable for framing by the apprentices. Since certificates are viewed as the “other 4-year degree”, the certificates need to be distributed with as much care as any other diploma.
- A better relationship with DLEAs is needed to ensure that forms are signed off in an expeditious manner.

Database

The current ACCESS database is the central repository for all apprenticeship data and assists in program management. It provides staff with read-only access to data and standard reports, and the capacity to convert reports to Excel files where data can be sorted and manipulated. The database is a valued tool for staff; however, staff use seems to be limited to a few reports. The database would benefit from a thorough review, exploring the possibilities of capturing additional data and providing more tools for automated monitoring and analysis.

Focus Group Findings

- The database relies on two full-time clerical staff and one part-time clerical staff who is temporarily reassigned to the AT unit to enter and maintain data. No other staff has access to enter or change information.
- Half of all ATRs who currently have read-only access to the database expressed an interest in having the ability to change and/or update data fields.
- Staff indicated that the work processes word documents that are stored in the database as attachments are valuable tools and frequently use this feature of the database.
- Staff found the AT1003 Report to be a very valuable tool and ATR staff provides a copy of this Report to each sponsor during their semi-annual monitoring visits.
- Staff has not received any formal training in recent years on the use of the database and its features.
- The database was not designed to track Recruitment due dates and/or track the dates when Affirmative Action plans are due to be updated.
- The database was not designed to generate regular reports to monitor performance outcomes.
- The database currently does not flag or identify programs that have been found to have severe monitoring issues.
- The database does not include a function that provides an automatic notice if an apprentice is less than 18 years old.
- The database does not monitor the form flow, such as tracking which step applications are in during the approval process.
- The database only records the following terminations: completion of worksite training, termination for cause, quit, layoff, and program termination.
- There are two databases, a pending database for potential sponsors and the main database.
- The majority of staff believes that the controls and security built into the database to enter or change information is necessary to ensure data integrity since ATCO is the repository for AT information.
- The database is controlled by one database manager whose time is not 100% dedicated to the Apprenticeship Training Office.

Impact on the Program

- Data input is only in the hands of 2.5 clerical staff positions and this could potentially be a serious issue if there is staff turnover.

- ATRs' read-only access to the database causes delays in making minor edits to the data such as changing addresses or fixing typos. Presently, to fix a typo, ATRs need to submit change requests to ATCO staff.
- The five categories of termination codes do not give enough detailed information regarding negative terminations. For example, an apprentice may have completed their worksite portion of the training but may not have had access to Related Instruction. That scenario is coded as termination for cause and provides no data regarding Related Instruction availability.
- By having two separate and distinct databases, there is a need to re-enter the data once the sponsor application is subsequently approved.
- Since the database manager is not a dedicated position in the AT unit, when staff request ad hoc reports, the response time to generate these reports is contingent upon the availability and workload of the database manager.

Conclusions/Recommendations

- It is important that AT staff be cross-trained on how to enter data, change data, and extract data for reports from the database while maintaining the integrity of the data.
- Develop an electronic signature to the data entry and/or change function which would identify who made edits and ensure integrity of the data and accountability.
- Develop a method to ensure that social security numbers and apprentice data can be encrypted so that the AT1003 can be sent to sponsors electronically.
- Revise the termination field to ensure that all possible reasons for termination are listed such as failed to complete Related Instruction, entered Military, obtained other employment, etc.
- Include a field in the database to track why the duration of training has been changed.
- Ensure that ATR staff access the data reports on a regular basis to monitor program performance outcomes.
- Create a flag devise in the database to identify sponsors and/or programs that have been found to have serious monitoring issues.
- Create a way for the database to identify the age of apprentice applicants and automatically detect applications for individuals less than 18 years old to save staff time calculating ages of applicants when entering AT401s.
- Connect the two separate databases (pending and current) so that once applications are approved, all of the information is transferred to the current database to save time re-entering the data.
- Create a way for the database to monitor form flow so that the status of pending applications is easily identified by both central and field staff.
- Update staff about the use and changes of the database during staff capacity building efforts.
- Revise the database to be able to automatically generate letters to sponsors when Recruitment or AA plans are due.
- Investigate a new electronic application system which would allow staff, sponsors, DLEAs and apprentices the ability to submit documents via the Internet.
- ATCO unit needs to have a technology staff person dedicated on a regular basis for the maintenance and upgrading of the database as well as to provide responses for

ad hoc reports and other information requests so as to ensure continuous data integrity checks and timely access to information by staff.

Strengthening the Apprenticeship Training Program

The review of the Apprenticeship Training program included information gathering and analysis which now offers the opportunity to strengthen the program, to recommend changes for better efficiency and outcomes, and to increase integration of the Apprenticeship Training program with the mission of WDT. There are several areas where thoughtful change could improve the image and the outcomes of the program.

1. Organizational Roles of the AT Program

A. Within the Department of Labor

The Apprenticeship Training program has operated for many years as a discreet program, alternately under the auspices of the Workforce Development and Training Division (WDT) and the Division of Employer Services (DoES). Currently, the program falls within WDT.

- Since AT is a proven training model developing the occupational skills of workers and meeting the workforce needs of employers, it is recommended that AT remain within WDT.
- Greater integration between WDT and AT will enhance both programs. Consider how apprenticeship might fit with other workforce strategies such as in the grant making process, using pre-apprenticeship for skill development, researching waivers, new policies, etc.
- Improve the structural connection between AT and WDT by placing a prominent link to the apprenticeship website on the Workforce New York and Career Zone websites.

B. Within the One-Stop System

The AT program focuses on meeting the workforce needs of individuals and employers. There should be a greater understanding of the role of the AT program within the One-Stop system.

- Provide cross training to AT staff, WDT staff, and One-Stop staff, centrally and locally, so that all are knowledgeable of the others' programs and can effectively respond to business and individual customer need.
- For purposes of system building, AT should have a consistent connection to the One-Stop System and staff.
- AT should become a "partner" in the local workforce system and participate in meetings, such as local business service team meetings, when appropriate.
- AT should connect with community-based organizations to promote AT programs to these non-traditional partners, who serve participants such as women, minority and youth.
- AT must create stronger connections with local workforce investment boards, assisting in their understanding of the AT program to encourage greater integration of apprenticeship in workforce solutions.

C. With Partner Divisions and Agencies

The AT program works with the Labor Department's Division of Equal Opportunity Development (DEOD) and the State Education Department (SED) in the implementation of the program.

- DEOD - AT should continue to monitor for delays in the approval of required AT forms and these should be brought to the attention of each of the Division's Directors for analysis and a resolution that increases efficiency.
- It is recommended that the procedures be changed to allow simultaneous submission of required program documents to both DEOD and ATCO.
- SED - AT should continue to work with staff within SED for improved efficiency of DLEA responses to AT requirements.

2. Apprenticeship Training Program Staff

Staffing the AT Program - Critical to the success of the program is the issue of staffing. The current lack of proper human resource allocation hinders program efficiency and outcomes.

A. Management Staff

The current level of management staffing is insufficient. At present, the position of the AT Director and other managerial staff are vacant items. Due to existing vacancies in management positions, the prior Director was required to become hands-on by signing-off on all documents and work process revisions, understanding the content and flow of all operations, handling all correspondence, dealing with staffing issues, and making day-to-day decisions. Directing and overseeing the Apprentice Training program at this level of micro-management is a hindrance to the program. There can be little attention to the mission and vision of the program, to integrating the apprenticeship program with the workforce development system, to developing stronger ties with the State Education Department and Economic Development, or to forging a prospective approach to developing trade outlines designed to be ready to meet the needs of emerging industries.

- A strategy for filling vacant positions and using staff capacity to the fullest is required to improve the vision, implementation and outcomes of the program.
- Delegate the Director's approval authority for work process revisions and recruitment requests to appropriate management/supervisory staff.

B. Field Staff

Currently, some AT regional areas are overstaffed; some are understaffed; some have clerical support; and some have no clerical support.

- Proper staffing: All areas should be properly staffed taking into account the number of apprentices and sponsors in the area and the geographic size of the area.
- Staff support: Program efficiency could be improved by staffing the AT offices with a program assistant, rather than a clerical support person. A program assistant is one who understands the program, the required documents and approval processes, and can track certain aspects of the apprenticeship program activities by freeing the ATR to take part in more program promotion and development activities.

- Staff changes: Staff roles and responsibilities, and changes to them, must be clearly articulated and made available in writing for all staff.
- Hiring consideration: Focus group participants were nearly unanimous in their belief that an ATR position calls for skills, abilities, and time commitments that are beyond that of a civil service grade level 18. Field staff are the face of DOL making public presentations to promote apprenticeship to high schools, vocational schools, chambers of commerce, trade associations, community based organizations, and non-traditional industries. They represent the Department to businesses both large and small, deal with union issues regularly, and interact with One-Stop staff and partners. Additionally, staff travel frequently to/from sponsor sites, often meet with apprentices in the evenings, and will participate in weekend or evening graduation ceremonies. For these reasons, staff feel that it will be very difficult to secure qualified candidates willing to consistently meet the demands of the job at a grade 18 pay scale. This opinion aligns with the statements of the Commissioner of Labor who, in her comments to the State Workforce Investment Board, stated that the Department was having difficulty recruiting AT investigators.

C. Central Office Staff

- Occupational Analysis: There is one, part-time Occupational Analyst in ATCO who responds to requests for new trade training outlines. While this staff level appears sufficient at present to meet the needs for new trade development, it should be noted that this determination is based on the development of only 0-5 new trades per year. This level of staffing would be insufficient if the program were more pro-active in completing research and developing work processes (training outlines) for trades in emerging industries such as Green Construction, Nanotechnology and Biotechnology.
    - ATCO should not wait for an employer to request a new trade but should be responsive to new technologies, emerging industries, and business development and be prepared to offer training outlines for emerging trades to potential sponsors. Such a pro-active approach would begin to address Commissioner Smith's question about where the apprenticeship program is being marketed and whether apprenticeship could be utilized as a workforce development tool in more fields.
    - Additionally, one staff person is currently dedicated 50% to assisting with all work process revisions. This is insufficient to complete these revisions since the use of technology in the workplace has rendered many of the training outlines for existing trades obsolete, requiring new technology and safety measures to be incorporated into most training outlines.
    - Increase the number of Occupational Analysts.
- Siloed work assignments: Due to understaffing, many of the activities in ATCO are handled by only one person. One person handles data entry. One person issues all certificates. One person reviews all recruitments. One person handles all the background checks. Focus group responses led to two conclusions:
  1) if staff were absent for even a few days, program processing would be delayed

until their return; and 2) staff are focused on a step within an entire process rather than focused on the flow of work required to achieve the outcome.

- Data integrity: The integrity of ATCO as the central repository of apprenticeship records and data must be maintained.
    - Support staff must be fully trained and must understand the program's operation.
    - The use of temporary support assistance from other Division units results in recording and or filing errors for the program.
- Focus on outcomes rather than processes: The linchpins of the apprenticeship program are quality and standardized training. As currently configured, ATCO appears more a processing unit than a program unit focused on outcomes. While processing and approving apprenticeship activities is crucial to program operation, more of the staff need to be critical thinkers, problem solvers also invested in program development, improvement, and outcomes.
    - Appointing a Director and managerial staff for the program and fully staffing the unit should invigorate the program and lead to the development of an overall vision for the program and a mission for staff.
    - Re-certify apprenticeship programs every three years by conducting due diligence checks, on-site facility inspection, and monitoring completion rates of the apprentices.
- Capacity building: Focus groups describe staff capacity as critical to the success of the program.
    - Field staff expressed an interest in networking with other field staff via conference calls and/or regional meetings to assure consistency in implementing procedures and to share best practices.
    - Training for additional Occupational Analysts is needed to meet current work process development and revision efforts and to move the program forward into new industries.
    - Training for ATCO staff in conducting due diligence checks and researching Lexis Nexis is necessary to improve the ability to analyze the results and would make the investigative process more efficient.
    - Procedural changes should be formalized and shared with all staff via written directives that become part of the procedures manual.

3. Technology

Technology is not fully used to increase the efficiency of the program.

The use of email, scanners, additional features within the database, fill-able forms, available laptops, additional promotional displays, print-on-demand brochures, more efficient laminating processes, can all be used to make the program operate more efficiently. However, a new electronic application system would further these efforts.

- Provide staff in ATCO and the field with a set of official, fill-able forms that are to be used by DLEAs, sponsors, apprentices, and staff. Hand-written forms contribute to data errors.
- Typed AT forms, once determined complete and approvable, can be scanned into the database, reducing the opportunity for error.

- Some changes to the database appear to be possible and should be fully explored.
- Blue Books seem to be an antiquated way to gather information on worksite training. An investigation into viable alternatives is recommended.

4. Marketing

A statewide marketing strategy should be developed that can be customized to areas and regions of the state but includes the goal of marketing to industries as opposed to marketing to specific employers.

- Provide incentives for employers to participate in the apprenticeship program. While sponsors are able to pay a sliding scale of wages to the apprentice, the employer is also responsible for the cost of Related Instruction. Tax credits would incentivize employers to participate. Employers are keenly aware that trained employees may leave for better paying jobs and view this as a risk to becoming a sponsor. Tax credits could off-set some of their hesitancy.

5. Efficiency Measure

- Delegate the Director's authority to approve and sign work process revisions and recruitment requests.
- To increase timeliness, allow simultaneous submittal of documents to DEOD and ATCO.
- Allow programs that have been without apprentices for a period of three years or less to be reinstated with appropriate changes following a due diligence check, rather than requiring an entirely new program application with development of all new forms and AA plans.
- Review the frequency of required program monitoring, determining which programs require more/less frequent monitoring. However, continue with a semi-annual correction of the AT 1003. If the apprentice SSN could be encrypted, email would make this activity more efficient and the sponsor could make the necessary corrections.

6. Apprenticeship Training Council

- The current status of the Apprenticeship Training Council, an advisory body to the Commissioner of Labor, does not meet the regulatory requirements.
- The Council has had long-standing vacancies and is lacking a Chair. Proper representation of labor and non-union organizations is required. An impartial chair must be named.
- The Council has not met in 12 months. A regular schedule of quarterly meetings should be re-instituted.

7. Department of Correctional Services Programs

- The DOCS apprenticeship programs should be handled as a separate program under the auspices of DOCS with a liaison in ATCO who provides technical assistance and monitoring.
- The DOCS apprenticeship programs differ from other apprenticeship programs with regard to available worksite training opportunities and Related Instruction. DOCS staff may sign-off on Related Instruction.

- The Division of Correctional Services should be accountable for keeping apprenticeship participation records up to date and assuring that individual records follow the inmates with each facility transfer. However, ATCO should remain as the central repository of all program and apprentice information.
- The concerns of apprentice inmates, who write numerous letters of request for information to ATCO which require staff research and response time, are more appropriately responded to by DOCS personnel.

Part I - Attachment A

Topics for Consultant to Research

Performance Outcomes

- What are best practices in other states regarding their performance outcomes, including but not limited to graduation rate and retention rate?

Monitoring

- Should the current monitoring procedure of two visits per year be sustained?
- Monitoring constitutes approximately 45% - 80% of ATR staff time.
- Monitoring visits are performed twice per year per sponsor without consideration of prior performance (i.e., such as the number and seriousness of issues found, or the number of apprentices in the programs).
- What are the procedures that other states use to monitor Apprenticeship Training Programs?
- Do all states use Blue Books? Is there another instrument that can be substituted? Is the Blue Book necessary?

Competency-Based versus Time-Based Training

- What states use competency-based training?
- What is the impact of competency-based training on the apprenticeship training program enrollments and outcomes?
- How would the use of competency-based training help to expand apprenticeship into additional trades?

National Skills Standards

- What is the impact of National Skills Industry Standards on the work processes for apprenticeship training programs? (i.e., such as manufacturing)
- Do other states incorporate National Skills Industry Standards into the work processes?

Related Instruction

- Should Related Instruction be expanded to include e-learning and distance learning? (i.e., currently distance learning is not allowed in the building trades occupations)
- Are other states successfully using this type of Related Instruction?

Workforce Investment Boards

- Currently there is little interaction between the WIBs and ATR staff. WIBs aren't interested in Apprenticeship Training if it can't help their WIB performance.
- What is the relationship between Apprenticeship Training and WIBs in other states?
- Are there examples of apprenticeship programs being supported at the local or state level with WIA funds?

- What costs are funded?
- Are there outcomes related to these services?

Technology

- Investigate electronic receipt and auto data-entry of forms AT10, AT12 and AT401.

Recruitment Strategies

- What recruitment strategies are other states using to attract non-traditional populations into the Apprenticeship Training program?

Diverse Program Development

- What strategies are other states using to develop programs in areas beyond the traditional building trades to address the emerging economy?

Sponsor Intent

- How do other states determine intent and address sponsors who only submit applications in order to be eligible for public work contracts?

Sponsor Focus Group

- Meet with sponsors to gain their perspective on NY's Apprenticeship Training Program, including recommended improvements.

Apprentice Focus Group

- Meet with apprentices to gain their perspective on NY's Apprenticeship Training Program, including recommended improvements.

Stakeholder and Partner Focus Group

- Meet with key stakeholders and partners to gain their perspective on NY's Apprenticeship Training Program, including recommended improvements.

State Governance Structure

- Review the current state governance structure for apprenticeship programs in New York State, both within DOL and the Apprenticeship Training Council.

Part I - Attachment B

Comments from Apprenticeship Training Staff

At the conclusion of each focus group interview, staff was asked to identify the three things they considered most important which they believe will have an impact on improving the overall quality of the Apprenticeship Training Office and Programs. The following responses reflect the staff's comments:

- Increase staffing. (Identified by 10 staff members)
- Technology/electronic access and e-mail submittal of forms. (Identified by 6 staff members)
- The downgrading of ATR staff to a grade 18. Staff believes that the requirements of the job and the skills needed to efficiently perform the job are not consistent with those of a grade 18 position. (Identified by 5 staff members)
- Need a Director appointment. (Identified by 3 staff members)
- Staff development. (Identified by 3 staff members)
- Need a Coordinator and/or Assistant Coordinator in ATCO. (Identified by 2 staff members)
- Need to streamline DEOD reviews.
- Question the value of the DOCS programs.
- Operate DOCS as a separate program.
- Need to look at voluntary deregistration and the program's ability to reactivate versus submitting an entire new program application.
- Need to look at what is required by the regulations versus procedures.
- AT is isolated on an island and not part of Workforce Development & Training.
- Quality of the AT supervisors.
- Prompt reviews of application.
- Consistency in following procedures.
- Staff networking.
- Database improvements.
- Better equipment.
- AT programs are underutilized as a workforce development tool.
- Update procedures.
- Too much detail and not enough of a big picture.

New York State
Apprenticeship Training Program
Process Mapping Report
A Review of the Recommendations' Impact on Labor Law, Regulations, Procedures and Forms
Part II

Developing and Registering New Apprenticeship Training Programs

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
The length of time it takes to approve an application is unacceptable.	N/A	This requires a new policy. Currently, there are no time frames established by policy or procedure regarding the state's determination of approval or disapproval of an AT program application.	N/A
There needs to be a way to track the pending application workflow through the database so that all staff is aware of issues/problems that are causing the delay.	N/A	N/A	This requires a modification to the database.
Technology needs to be used to expedite the submittal and processing of applications.	N/A	This requires a policy addition to the procedures at Sections 6200-6270 to include the practice of accepting electronic signatures, aligning this practice with the timeframe for program approval.	This requires a modification to the current database or the development of a new electronic application system. The use of electronic and/or fill-able forms can expedite the submittal and processing of applications. The following forms are used for new program applications and would need to be

Process Mapping Report Conclusions/Recommendations	**Changes Required for Implementation**		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
			modified: Form AT8 – Related Instruction Availability Form AT9 – Sponsor Information Sheet Form AT10 – Apprentice Training Program Registration Agreement Form AT11 – Apprentice Training Program Transmittal Form AT401 – Apprenticeship Agreement Form AT505 – Apprentice Training Recruitment Notification And Minimum Qualifications Form AT506 – Recruitment Transmittal Form AT508 – Selection Standards and Evaluation Form AT602 – Non-Discrimination Plan Form AT603 – Apprentice Training Program Affirmative Action Plan

Process Mapping Report Conclusions/Recommendations	**Changes Required for Implementation**		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
The use and legal implications of electronic signatures needs to be investigated.	N/A	If electronic signatures are found acceptable by Counsel's Office, then new policy and procedures will need to be developed.	If electronic signatures are found acceptable by Counsel's Office, then forms will need to be revised, as appropriate, including the following: Form AT8 – Related Instruction Availability Form AT9 – Sponsor Information Sheet Form AT10 – Apprentice Training Program Registration Agreement Form AT11 - Apprentice Training Program Transmittal Form AT401 – Apprentice Agreement Form AT602 – Non-Discrimination Plan Form AT603 – Apprentice Training Program Affirmative Action Plan
The number of reviewers examining the application does not add value to the process. It was found that the initial evaluation of an	N/A	The procedures manual, and particularly Section 6240, should be revised to	N/A

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
application could project its success: i.e., applications that were completed and recommended for approval, eventually were approved, contingent upon the outcomes of the due diligence process.		articulate the review process for new applications.	
The relationship with the DLEAs needs to be improved, especially in the New York City area.	N/A	N/A	N/A
The submittal of information to DEOD needs to occur simultaneously rather than sequential to the ATCO submittal.	N/A	Procedures will need to be established specifying the simultaneous application submittal to ATCO and DEOD.	N/A
When approving a new sponsor's application, it was found that the following issues are critical: the due diligence process, a fair recruitment process and affirmative action plan, the site visit to ensure the sponsor's ability to provide the training in a safe setting, and identification of Related Instruction.	N/A	N/A	N/A

Marketing

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
A statewide marketing strategy is needed to ensure that all ATRs are providing consistent information to achieve the goals of the program. The message should be an overarching theme that can be refined based on local needs and local labor market data.	N/A	The marketing procedures are at Sections 5000-5215. The adoption of a statewide marketing strategy will require the addition of a policy statement and the development of implementation procedures.	Once a new statewide marketing strategy is adopted, all brochures, presentation materials and the website will need "branding" to convey a consistent theme, matching the "branding" used by the Department. The overall marketing strategy should contain presentation materials such as a professional quality PowerPoint presentation that conveys consistent program information but allows customization for local labor market data, local contact information, etc. Marketing materials need to

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
			include a variety of items which are of high quality and meet the needs of various customers (youth, adults, employers). The quality of marketing materials should rival that of colleges (Apprenticeship Training is a postsecondary education and training option.).
Current marketing includes activities such as job fairs, Career Technical Education Days and attendance at conferences. However, marketing should be pro-active rather than reactive; ATRs should promote the AT program by conducting presentations to partners such as high schools, vocational schools, chambers of commerce, trade associations and community-based organizations, as well as market to non-traditional industries such as Green Construction, Nanotechnology, and Biotechnology.	N/A	Procedures currently state that one of the ATR's responsibilities is to market the AT program. New procedures may be required to further define marketing/program promotion activities.	N/A
The AT program needs to have an identity. Marketing materials should include the "Workforce New York Logo". Also, AT	N/A	This is a policy decision.	The Workforce New York and Career Zone websites should have links to connect

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
program information should be linked to the Workforce New York and Career Zone websites.			with information on Apprenticeship Training. Apprenticeship should be seen as a viable workforce development tool within the public workforce system.
ATRs should build the capacity of the One-Stop System staff by educating staff and partners on the steps to become an apprentice or a sponsor.	N/A	Section 5205 deals with the relationship between the apprenticeship program and the One-Stop system. Scheduled staff capacity building is an administrative decision which will subsequently require that procedures be developed.	ATR staff will need access to the PowerPoint Presentation and high quality marketing materials listed above to conduct system building training to One-Stop staff and partners.
ATRs need a connection to the One-Stop Centers for system building activities.	N/A	Policy regarding system building should be developed in accordance with TEGL 02-7, Leveraging Registered Apprenticeship as a Workforce Development Strategy in the Workforce Investment System.	N/A
In order to equate the AT program as the "other four-year degree", marketing materials for	N/A	N/A	Marketing materials should be integrated with the

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
youth need to be comparable to materials used by colleges in their quality, interest, and explanation of outcomes and benefits.			Career Zone website.
By having a clear connection with the One-Stop Center when an employer's training program does not match the time requirements of the ATP, the ATR may refer the employer to the One-Stop Center for programs such as On-the-Job Training (OJT) to ensure seamless services for the employer.	N/A	Amend Section 5205 to include a clear referral process that may be initiated by staff of either the WIA or the AT program.	N/A
All ATRs should become a "partner" in the local workforce system and participate in meetings such as local business service teams, when appropriate.	N/A	Amend Section 5205 to include information sharing between WIA and AT programs, including such things as meeting notices, committee membership, and capacity building sessions.	N/A
Staff capacity building for ATRs should include presentation skills and use of "prepared" presentations to enhance the ATRs ability to market the program.	N/A	N/A	N/A

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
ATRs should connect with community-based organizations to educate non-traditional partners who serve participants such as women, minority and youth, about the AT programs.	N/A	CBOs and non-traditional partners should be notified by mail of public recruitments for new apprentices. Section 5050 should be edited to include an emphasis on actively engaging these organizations and partners in the identification of potential apprentices.	N/A

Monitoring Apprenticeship Training Programs

Process Mapping Report Conclusions/Recommendations	**Changes Required for Implementation**		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
The role of the ATR as monitor requires clarification as it is interpreted differently across the state. This individual interpretation dictates the amount of time spent on monitoring. Is the ATR role one of case manager (*who meets with each apprentice during monitoring to assure successful individual completion*) or is it facilitator/technical assistance provider (*who interviews a sample of apprentices to assure both the sponsor's and the apprentices' compliance with program standards*)?	N/A	The procedures at 4105 include the number and frequency of apprentice interviews. These procedures are not consistently followed by all ATRs. Once the essential question of the ATR role is determined, these procedures will need to be strengthened and consistently followed. The procedures at Section 4120 state that the sponsor must evaluate the apprentice every six months at a minimum. This should be taken into consideration when procedures are developed for the ATR to meet with the apprentice.	N/A

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
All ATRs should be conducting monitoring in the same fashion. Data indicates that apprenticeship programs across the regions of the state have fairly similar outcomes with respect to numbers of apprentices who complete/do not complete the program, regardless of the intensity of the monitoring provided in that region.	No changes required to law, however when making changes to NYS policy, we will need to consider § 600.10(a)(c) which requires a review for compliance with Equal Employment Opportunity (EEO) as part of the registration process, regularly conducted systematic reviews on an ongoing basis, and additional reviews as warranted.	Sections 4105 and 4120 may require revision once the role of the ATR as monitor is clarified.	N/A
Blue Books are not consistently used across all programs. Are they considered efficient tools or antiquated tools? Are any other states using technology to more efficiently track job rotation and worksite training hours?	N/A	If / when other methods for capturing work rotation are approved, new procedures will be required and revisions will be necessary throughout the procedures manual.	As Coffey Consultants reaches out to other states to find best practices, they are inquiring what other states are using in place of Blue Books. The results of this review may have an impact on forms.
The AT 12 form needs to be revised to provide documentation of the verification methods used for monitoring, as well as to identify	N/A	Section 4150 may need to be revised based on revisions to the AT12 form.	This will require redesigning Form AT12 and modifications to the

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
observations, findings, recommendations and/or the need for corrective action plans. Consideration should be given to making the AT 12 form electronic with the data automatically transferred into the database system and linked with the sponsor record.			database.
There needs to be consistency in how corrective action issues are addressed, i.e., verbally or in writing.	No changes required to law, however when making changes to NYS policy, we will need to consider § 600.10(d).	While procedures at 4150 and 4200 give the ATR responsibility for dealing with issues uncovered during monitoring, a clear procedure for documenting *all* issues must be developed.	This could result in the addition of a new form that addresses corrective action issues or additional modification to the Form AT12 – Apprentice Training Program Status Report.
ATCO reviewers of monitoring reports should have the ability to easily compare previous reports to current Form AT12 reports.	N/A	New ATCO procedure must be established.	This may involve a change to the database.
It might be beneficial to have a systematic way to flag a sponsor when there are outstanding or egregious program issues as noted via the monitoring report.	N/A	Procedures would need to be developed if monitoring issues were included in the database.	A change in the database would be required to include flags of varying degrees to express the severity of the program issues found during

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
			the monitoring report.
ATCO staff spends time making changes to the database which could be done in the field to expedite processing.	N/A	Procedures at 4205 should be changed to meet actual need and to encourage greater efficiency.	This would require a change in the permission level of the database.
Sponsors are monitored twice per year regardless of whether they have new or old programs, whether the program history is excellent or problematic, whether there are large or small numbers of apprentices. More emphasis and consideration might be given to developing a list of factors and outcomes that would determine annual monitoring needs.	No changes required to law, however when making changes to NYS policy, we will need to consider § 600.10(a)(c) which requires a review for compliance with Equal Employment Opportunity (EEO) as part of the registration process, regularly conducted systematic reviews on an ongoing basis, and additional reviews as warranted.	A procedural change to the current requirement noted in Section 4000 is required if it is determined that the frequency of program monitoring is based on a set of factors rather than a time-based approach.	This could impact Form AT12 if additional information is required.

Recruitment for Apprenticeship Training Programs

Process Mapping Report Conclusions/Recommendations	**Changes Required for Implementation**		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
To assist in providing timely recruitment, consider making the following standard database system reports: o expiration dates of AA Plans o annual or semi-annual recruitment method with last cycle dates	N/A	N/A	This would require a modification to the database.
In addition to the DEOD review, one DOL review should be sufficient.	N/A	N/A	N/A
Simultaneous submittal of recruitment forms to DEOD and DOL would speed approval process.	N/A	This will require a change to Section 8210.	N/A
It is suggested that recruitment forms be completed electronically and transmitted via email while ensuring forms maintain legal requirements.	N/A	N/A	This would require changes to: Form AT505 – Apprenticeship Training Recruitment Notification and Minimum Qualifications Form AT506 – Recruitment

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
			Transmittal Form AT508 – Selection Standards and Evaluation.
Agency discussions may be required to ease the testing situation for NYC.	N/A	N/A	N/A
Website posting should be searchable by region and/or occupation.	N/A	N/A	This would include a modification to the website.

Registering an Apprentice

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
Staff needs to be cross-trained so that the registration process is not impacted by personnel issues.	N/A	N/A	This may require a change to the permission level in the database.
Due to the contractual nature of the AT401, a thorough supervisory review needs to be completed in the field to ensure the information is correct before being signed by the apprentice and sponsor and forwarded to ATCO.	N/A	N/A	N/A
Recruitment lists maintained by field and ATCO need to be consistent.	N/A	New procedure at Sections 8300-8310 is required to assure efficiency and consistency.	This would require a shared file on a server to ensure that both field staff and ATCO staff have access to the most current Recruitment Lists.
Registration of AT401's is mainly a data input issue. Fill-able forms and electronic signatures should be investigated which would omit in-put errors due to illegible handwriting and/or submission of incomplete applications.	N/A	A policy change regarding the use of electronic forms will require the development of new procedures for completing	This would require a change in the database and a change for Form AT401 – Apprentice Agreement to make it fill-able and scan-

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
Currently, one full-time clerical staff position is dedicated to the data input of AT401s.		and transmitting forms, meeting privacy requirements and storing the data.	able.
Expediting the registration process by using electronic or scan-able forms would reduce and/or eliminate the need to adjust program start dates and free up staff time. Consideration could be given to: o The ranked recruitment lists be electronically maintained by the sponsor using only the last four digits of the social security number. o List of updates be consistently recorded and new lists emailed to the ATR with each new AT401. o ATCO could email ATRs to request lists rather than returning AT401s.	N/A	A policy change regarding the use of electronic forms will require the development of new procedures for completing and transmitting forms, meeting privacy requirements and storing the data.	This would require a shared file on a server to ensure that both field staff and ATCO staff have access to the most current Recruitment Lists.

Certificates of Completion

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
Cross-training of staff is needed to ensure that more than one individual can print certificates and laminate cards.	N/A	N/A	N/A
Running batches makes for an efficient process but could prevent timely distribution of certificates.	N/A	N/A	N/A
The purchase of a new laminating machine should be investigated. New technological advances might help expedite the certificate/card issuance process.	N/A	N/A	N/A
Proper packaging materials are needed to insure that certificates and cards arrive in conditions suitable for framing by the apprentices. Since certificates are viewed as the "other 4-year degree", the certificates need to be distributed with as much care as any other diploma.	N/A	N/A	N/A
A better relationship with DLEAs is needed to	N/A	N/A	N/A

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
ensure that forms are signed off in an expeditious manner.			

Database

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
It is important that AT staff be cross-trained on how to enter data, change data, and extract data for reports from the database while maintaining the integrity of the data.	N/A	N/A	This would require a change to the permission level in the database.
Develop an electronic signature to the data entry and/or change function which would identify who made edits and ensure integrity of the data and accountability.	N/A	N/A	This would require a change in the database to include a vehicle to track who made changes to the data or who performed data entry.
Develop a method to ensure that social security numbers and apprentice data can be encrypted so that the AT1003 can be sent to sponsors electronically.	N/A	The encryption of Social Security numbers in apprenticeship records is a policy decision. The procedures manual would need to be revised accordingly.	This would require IT staff to develop a secured e-mail system or to develop a way to encrypt data that will be sent through the current e-mail server.
Revise the termination field to ensure that all possible reasons for termination are listed such as failed to complete Related Instruction, entered Military, obtained other employment, etc.	N/A	N/A	This would require a change in the database. This may require a change to the Form AT-401 to show

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
			the various reasons for termination.
Include a field in the database to track why the duration of training has been changed.	N/A	N/A	This would require a change in the database.
Ensure that ATR staff access the data reports on a regular basis to monitor program performance outcomes.	N/A	This would require a change in procedures to ensure staff are utilizing data reports for their monitoring visits.	N/A
Create a flag devise in the database to identify sponsors and/or programs that have been found to have serious monitoring issues.	N/A	Procedures would need to be developed if monitoring issues were included in the database.	A change in the database would be required to include flags of varying degrees to express the severity of the program issues found during the monitoring report.
Create a way for the database to identify the age of apprentice applicants and automatically detect applications for individuals less than 18 years old to save staff time calculating ages of applicants when entering AT401s.	N/A	N/A	This would require a change in the database.
Connect the two separate databases (pending and current) so that once applications are approved, all of the information is transferred to the current database to save time re-entering the data.	N/A	N/A	This would require a change to the two databases, both the “pending” database and “current” database.

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
Create a way for the database to monitor form flow so that the status of pending applications is easily identified by both central and field staff.	N/A	N/A	This would require a change in the database.
Update staff about the use and changes of the database during staff capacity building efforts.	N/A	N/A	N/A
Revise the database to be able to automatically generate letters to sponsors when Recruitment or AA plans are due.	N/A	N/A	This would require a change in the database.
Investigate a new electronic application system which would allow staff, sponsors, DLEAs and apprentices the ability to submit documents via the Internet.	N/A	Formalize a policy and develop procedures based on the extent to which technology will be used.	This would require substantial changes to the website for the electronic submission of forms.
ATCO unit needs to have a technology staff person dedicated on a regular basis to the maintenance and upgrading of the database as well as to provide responses for ad hoc reports and other information requests so as to ensure continuous data integrity checks and timely access to information by staff.	N/A	N/A	This requires an administrative decision.

Other

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
Since AT is a proven training model developing the occupational skills of workers and meeting the workforce needs of employers, it is recommended that AT remain within WDT.	N/A	N/A	This requires an administrative decision.
Delegate the Director's approval authority for work process revisions and recruitment requests to appropriate management/supervisory staff.	N/A	Procedures will need to be developed.	N/A
Re-certify apprenticeship programs every three years by conducting due diligence checks, on-site facility inspection, and monitoring completion rates of the apprentices.	N/A	This involves a policy decision and the development of procedures.	This information will need to be added to the website and forms created/edited.
Training for ATCO staff in conducting due diligence checks and researching Lexis Nexis is necessary to improve the ability to analyze the results and would make the investigative process more efficient.	N/A	N/A	This requires an administrative decision.
The use of email, scanners, additional features within the database, fill-able forms, available laptops, additional	N/A	The extent to which technology will be used is a policy decision that entails a	Using fill-able forms and print-on-demand brochures will require changes to

Process Mapping Report Conclusions/Recommendations	Changes Required for Implementation		
	NYS Labor Law Article 23 & NYS Regulations – Parts 600 & 601	Apprenticeship Training Procedures Manual	Other - including Forms, Website
promotional displays, print-on-demand brochures, more efficient laminating processes, can all be used to make the program operate more efficiently. However, a new electronic application system would further these efforts.		commitment of finances, time and training. A move toward greater integration of technology will necessitate the development of several new procedures.	forms and the website. This could result in an alternative document to the Blue Book.
Provide incentives for employers to participate in the apprenticeship program. While sponsors are able to pay a sliding scale of wages to the apprentice, the employer is also responsible for the cost of Related Instruction. Tax credits would incentivize employers to participate. Employers are keenly aware that trained employees may leave for better paying jobs and view this as a risk to becoming a sponsor. Tax credits could off-set some of their hesitancy.	N/A	This involves a policy decision and the development of procedures.	This information will need to be added to the website and forms created/edited.
Allow ATRs to determine if programs that have been without apprentices for a period of three years or less should be reinstated with appropriate changes following a due diligence check, rather than requiring an entirely new program application with development of all new forms and AA plans.	N/A	This involves a policy decision and the development of procedures.	This will require a forms change.

New York State
Apprenticeship Training Program
Process Mapping Report
Implementation Plan
Part III

Implementation Plan - Part III

This implementation plan provides an overview of the actions needed to implement the recommendations identified in the Apprenticeship Training Process Mapping Report. The Division of Employment and Workforce Solutions/Apprenticeship will need to ensure that this implementation plan aligns with the findings and recommendations identified by Coffey Consulting in their report.

Electronic Processes

The following four areas need to be addressed to move the Apprenticeship Training Office away from burdensome paperwork and into an electronic system:

Current Database

- Establish a workgroup to make the following interim changes to the database:
    - Provide edit access to Apprenticeship Training Representative (ATR) staff.
    - Develop a way to track pending applications.
    - Develop a way to generate letters to sponsors when recruitment and/or affirmative action plans are due.
    - Develop a field which reads the date of birth information and immediately provides a dialogue box to show if the apprentice is under the age of 18 to ensure that staff obtains appropriate documentation.
    - Performance data and reports need to be easily extractable from the database by all staff.
- Provide staff capacity building on the current database system.

Electronic Application Process

- Formalize a policy regarding the extent to which technology will be used for the Apprenticeship Training Program.
- Commit financial and staff resources to the development of a new electronic application system which would allow staff, sponsors, Designated Local Educational Agencies (DLEAs) and apprentices the ability to submit applications and required forms via the Internet.
- Establish a Department of Labor (DOL) workgroup to explore and recommend policy for a new database with:
    - Electronic submission.
    - Electronic signatures.
    - The ability to view previously submitted forms.
    - Flags to indicate when a sponsor has outstanding issues.
    - The ability to track pending applications.
    - The ability to provide reports and automatically generate letters to sponsors when recruitment and/or affirmative action plans are due.

    - An electronic coding or signature of the individual who entered information into the database for internal control purposes.
    - Enhanced termination codes to gage a variety of reasons why apprentices fail to complete their training.
    - Ability to receive data from scan-able forms.
    - Text fields which allow ATRs to record narrative information such as why the training time is extended.
- Develop a Request for Proposal (RFP) to procure a vendor to develop the new technological database system.
- As the system is developed, conduct focus groups to ensure the new system is user-friendly to sponsors and staff.
- Once the new system is developed, update the procedure manual to reflect the new processes.
- Provide capacity building to the Apprenticeship Training staff, sponsors, and DLEAs on use of the new electronic system, including staff's use of laptops and scanners.
- Roll out the use of the new electronic system.

Electronic Transmittal of Documents

- The workgroup charged with the task of developing a new electronic system should also investigate how data can be encrypted so that information, such as lists containing social security numbers, can flow electronically between Apprenticeship Training Central Office (ATCO), field offices and sponsors, as well as the exchange of information between ATCO and the Bureau of Public Work.

Electronic Blue Books

- Using public feedback, the workgroup should search for an appropriate electronic record keeping system for the apprentices and sponsors to track hours completed for both work and Related Instruction in lieu of Blue Books.

Marketing

- Establish a DOL workgroup, including staff from the Office of Communications and Career Zone, to develop a statewide marketing strategy which utilizes a pro-active approach, and includes strategies specifically targeted to youth.
    - Create high quality marketing materials which rival those used by colleges and which can be placed on the website.
    - Brochures, presentation materials and the website need branding to convey a consistent theme, matching the branding used by the Department, such as the Workforce New York logo.
    - Create a PowerPoint presentation that conveys consistent program information but allows customization for local area data.

    - Add AT program information and a link to the Apprenticeship Training Program website on the Workforce New York website.
    - Add AT program information and a link to the Apprenticeship Training Program website on Career Zone's website.
- Issue policy embracing the new marketing strategy/campaign.
- Develop procedures to support the new marketing campaign.
- Partner with local One-Stops to ensure Apprenticeship Training marketing materials are reaching community based organizations who serve participants such as women, minority and youth.
- Provide staff capacity building that includes development of presentation skills, training on the use and customization of PowerPoint presentations, use of Career Zone, and an overall proactive approach to marketing.
    - Apprenticeship Training staff must be prepared to make presentations to potential sponsors (including those representing new industries and trades such as Green Construction, Nanotechnology and Biotechnology), community-based organizations (CBOs), One-Stop staff, high schools, vocational schools, chambers of commerce and trade associations.
- Roll-out the marketing campaign.

Monitoring

- Issue clarification of the ATR's role as that of case manager (to the apprentice) and facilitator/technical assistance provider (to the sponsor) to ensure a quality program.
- Revise the AT12 Monitoring Form to provide documentation of the verification methods used for monitoring, as well as to identify observations, findings, recommendations and/or the need for corrective action plans. Revisit the monitoring procedure to determine if the amount of monitoring required should be based on the number of months that pass or the types of findings and issues identified during the previous monitoring visit(s). The current monitoring procedure, twice per year, should then be revised to include: the frequency/intensity of monitoring, flagging programs with serious issues, consistent corrective action requirements, and detail the types of data and performance reports needed to support a thorough monitoring review. Provide staff capacity building to clarify the ATR's role and new monitoring requirements to ensure consistency across ATRs and the state, and provide guidelines for documentation of issues found, the use of a corrective action plan and time management training.

Partners

- Apprenticeship Training staff should meet with Designated Local Educational Agency (DLEA) staff to improve relationships and ensure timely sign-off on forms.

- Issue both a policy directive, via a Technical Advisory, and Apprenticeship Training procedures based on Training and Employment Guidance Letter (TEGL) #02-7 to integrate the Apprenticeship Program into the public workforce system which should include a two-way referral system.
- Issue procedures regarding system building that includes creating consistent connections with One-Stops, CBOs, and schools. ATRs should participate in partner meetings such as local business service teams, when appropriate.
- Provide staff capacity building to ensure consistent connections to partners throughout the state.

Incentives

- Establish a workgroup to research what types of incentives can be made available to employers to participate in apprenticeship programs, such as:
    - Apprenticeship Related and Supplemental Instruction Program (ARSIP) funding, Workforce Investment Act (WIA) funding or other funding.
    - Tax incentives targeted to non-traditional occupations and industries such as Green Construction, Nanotechnology, and Biotechnology.
    - Discounts on Workers' Compensation premiums due to the Apprenticeship Training Program's emphasis on safety training.
- Issue policy and requisite procedures for use of incentives.
- Update marketing materials and the Apprenticeship Training website to include information on available incentives.
- Provide staff capacity building regarding the use of the new incentives.
- Rollout incentives as part of the marketing campaign.

Additional Policies and Procedures

- Issue a policy and requisite procedure to specify the length of time in which a program application must be reviewed and applicant notified of eligibility determination.
- Issue a policy and requisite procedure to require recertification at three year intervals for Apprenticeship Programs. This may include a due diligence check, on-site facility inspection, review of any recent or modified Joint Apprenticeship Committee (JAC) agreements, and monitoring of apprentice performance standards.
- Issue a policy and requisite procedure allowing programs that have been without apprentices for three years or less to be reinstated, following a due diligence check and filing of any other necessary documents.
- Issue a procedure to streamline the application review process, focusing on the number of reviews required for program determination.
- Issue a revised procedure for the submittal of the Affirmative Action Plans to the Division of Equal Opportunity Development (DEOD), focusing on simultaneous reviews rather than sequential reviews.

- Establish a policy and requisite procedure for addressing the addition of new signatories to existing programs, including due diligence requirements.
- Delegate the Director's approval authority for work process revisions and recruitment requests to other management/supervisory staff to ensure timely reviews.
- Issue a policy and requisite procedure utilizing methods such as public comment periods or public hearings to ensure that the development of new trades does not intrude upon existing work processes.
- Issue procedures regarding the maintenance of a shared file to include: recruitment lists, procedures manual updates, Sponsor's Handbook and forms.
- Establish a workgroup to review the procedure manual, Sponsor's Handbook and forms. There are currently three versions of the procedure manual which need to be reviewed. Then as new policies and procedures are implemented, the procedure manual, Sponsor's Handbook and forms will need additional updates.
- Provide staff capacity building on new policies/procedures as they are adopted.

Other

Additional areas that need to be addressed:

- During the interim period while the electronic application system is being developed, prepare fill-able forms and post to the website for easy access to staff, sponsors, DLEA and apprentices.
- Provide a thorough review of information posted on the website to ensure it is up-to-date and pertinent to the needs of apprentices and sponsors.
- Website posting of current recruitments should be searchable by region and/or occupation.
- Increase staff for the AT program, including a Director, Occupational Analyst staff and a staff person dedicated to support the current database as well as the proposed new electronic application system and the program performance perspective of the program.
- Appoint Council members to ensure full composition and conduct regularly scheduled meetings.
- Establish a workgroup to recommend performance standards considering the following: wage reporting records, wage retention, completion rate, and length of time it takes an apprentice to complete their training program.
- Explore the purchase of a new laminating machine and packaging materials to be used for the distribution of apprenticeship certificates.
- Cross-train ATCO staff on all aspects of the program, including the due diligence review.

Addendum – Part III

The following issues were identified following completion of the Process Mapping Report and need to be included in the rollout of the Implementation Plan:

- Establish a two year probationary period for new sponsor applications.
- A policy is needed to post all new trade applications and new program sponsor applications on the website to allow the public a two week time period to submit formal comments via a certified/notarized letter addressed to the Commissioner of Labor.
- ATRs need to continue to obtain lists of signatories for joint apprenticeship training programs and employer associations.
- The need to evaluate the current due diligence process and adoption of a consistent method for use by the Department. NYSDOL currently uses a Responsibility Questionnaire for WIA contracts without the use of Lexis Nexis, whereas AT Program applicants must complete an AT9 form and undergo review by Lexis Nexis. In addition, if we continue with a Lexis Nexis review, additional licenses and staff training would be required.
- The need for a Youth Apprenticeship Program. The Division of Employment and Workforce Solutions has released a Request for Information (RFI) for Consultant Services to retain a consultant to assist New York State in the research and development of a Youth Apprenticeship Program.
- In addition to working closely with our partners at SED, AT needs to enhance relationships with partners and continue dialogues with DOT, DOCS, DEOD and other stakeholders.
- Restructure the monitoring procedures for the DOCS Programs.
- A policy is needed to review data regarding women and minority apprentices, including the possible development of incentives, to enhance enrollment numbers among this population.
- Analyze AT Program data to determine the impact of the recently enacted Wicks Legislation.
- There is a need for an equitable distribution of ATR staff workloads throughout the state.
- There is a need to validate the data in the AT Program's current database.
- Upon review of the AT website, the following areas need to be addressed:
    - Remove AT 12, the Apprenticeship Training Program Status Report (Monitoring Form).
    - There are two versions of Article 23 on the website. Remove one version and retain the 2/2005 version.
    - Replace Part 600 due to a formatting error which failed to label §600.12.
    - Post the current Sponsor's Handbook.