

Summarizing Approaches for Designing Inclusive Apprenticeship Programs

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Introductions

- US Department of Labor Office of Disability Employment Policy
 - Taryn Williams, Assistant Secretary for Disability Employment Policy
 - Jackson Costa, Senior Economist
 - Scott Robertson, Senior Policy Advisor
- Apprenti
 - Jennifer Carlson, Co-Founder and Executive Director
- Urban Institute
 - Zach Boren, Senior Policy Program Manager
 - Karen Gardiner, Senior Fellow
 - Daniel Kuehn, Principal Research Associate
 - Stephanie Petrov, Research Assistant

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September 18, 2024

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Karen Gardiner, Daniel Kuehn, and Stephanie Petrov

Study and Webinar Overview

Study Goals and Data Collection

- DOL's Office of Disability Employment Policy (ODEP) funded the Research to Support the Partnership for Inclusive Apprenticeship Project to:
 - Document different inclusive apprenticeship models
 - Describe how programs are designed to be inclusive of people with disabilities
 - Learn what advice, resources, and assistance employers need to develop and maintain inclusive apprenticeship programs
- Data sources included:
 - Review of literature
 - Discussions with inclusive apprenticeship partners in fall 2023 (n=18)
 - Online survey of inclusive apprenticeship partners in spring 2023 (n=34 complete responses)
 - The Registered Apprenticeship Partners Information Data System (RAPIDS)

Webinar Agenda

- Define registered apprenticeship and inclusive apprenticeship
- Describe trends in the proportion of apprentices self-identifying a disability
- Introduce the apprenticeship ecosystem and its role in each stage of the apprenticeship
- Hear the perspectives of two ecosystem partners
- Share where to find additional information

What is Registered Apprenticeship?

What Makes Apprenticeship Inclusive?

What Is Registered Apprenticeship?

- Programs that provide paid on-the-job learning (OJL) and related instruction (RI) in an occupation and foster skills and industry recognized credentials.
- Programs adhere to guidelines and standards for registration set by either the DOL Office of Apprenticeship (OA) or a State Apprenticeship Agency (SAA).



What Is Inclusive Apprenticeship?

- Have all elements of Registered Apprenticeship programs
- Are intentionally designed to support access and completion by apprentices with disabilities and other diverse, underrepresented populations.
- Promising practices include:
 - Universal Design for Learning
 - Accessible workplace technology and accommodations (e.g., modified work schedules, accessible or modified equipment, worksite adjustments)
 - Training and technical assistance to employers and workplace personnel
- Partnerships are essential to promoting inclusive apprenticeship at each stage

Challenges to Expanding Inclusive Apprenticeships

- Employers may:
 - Lack awareness of apprenticeship as a training model
 - Not recognize or consider inclusive talent in hiring
 - Believe anti-discrimination practices alone make apprenticeships inclusive
 - Be concerned about the costs of accommodations and liability
- Apprentices may not self-identify or request accommodations
- Programs may not be designed with inclusion in mind
- Intermediaries may not be aware of funding to support inclusive apprenticeship efforts, such as funding for accommodations

Legal and Regulatory Context

- Title I of the **Americans with Disabilities Act** requires employers with 15 or more employees to provide reasonable accommodations during the hiring process and on the job
- The 2016 revisions to the **National Apprenticeship Act Equal Employment Opportunity regulations** added a prohibition of discrimination in registered apprenticeship programs based on disability status

Trends in Apprenticeship Self-Identification of Disability

“Without data, opportunities to address inequities and social justice are erased.”

- Bonnie Swenor, Johns Hopkins School of Nursing

Self-Identification of Disability in Apprenticeship

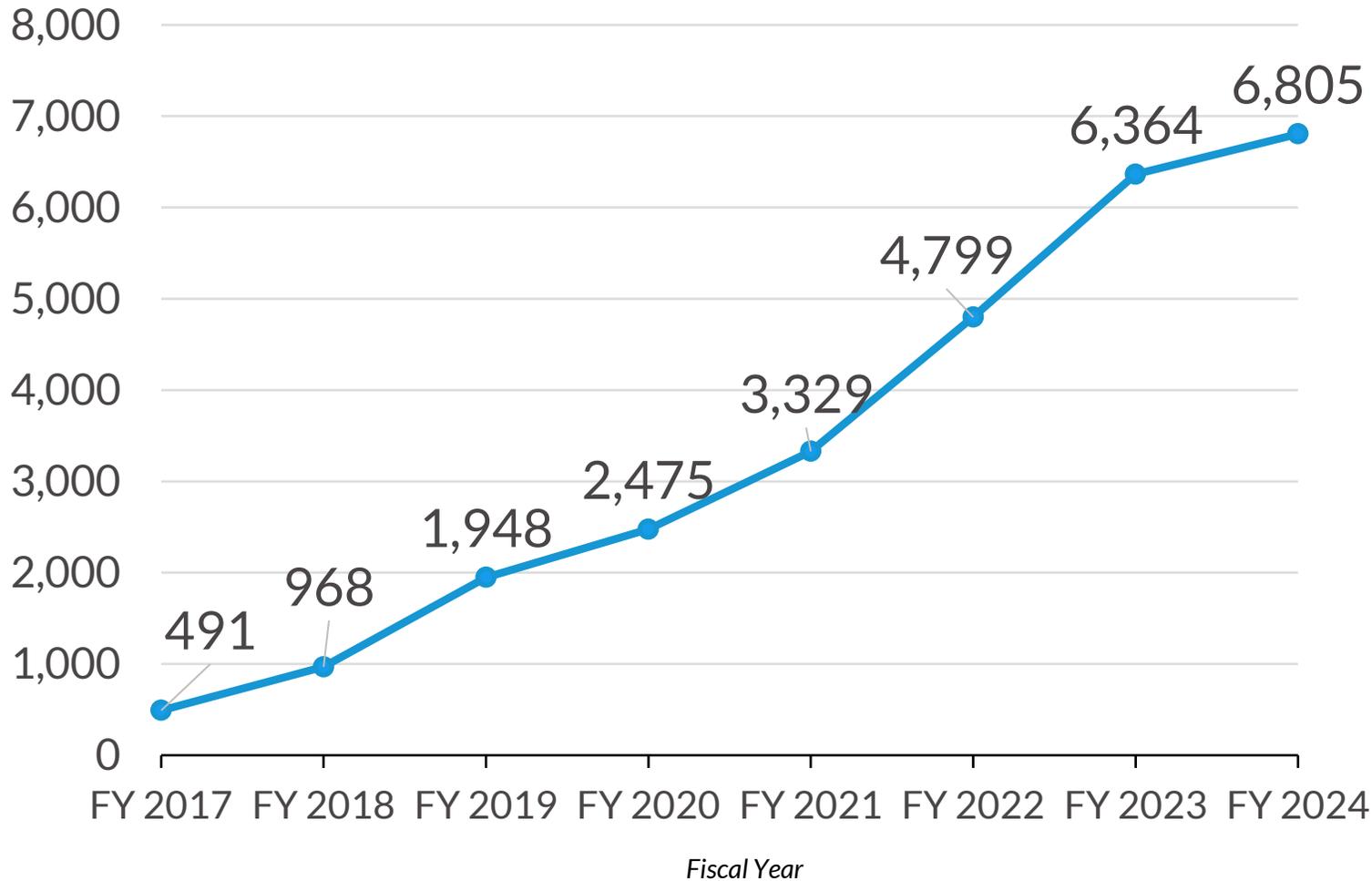
- Voluntary Disability Disclosure Form 671 Section II, Part A was introduced in 2017 for program sponsors to invite apprentices to self-identify **at application** and **annually during their apprenticeship**.
- “Aspirational goal” that at least **7 percent** of registered apprentices are individuals who identify as having a disability.
- The self-identification requirement and goal apply to registered apprenticeship programs with **at least five apprentices**.

The Voluntary Disclosure Form lets apprentices disclose their disability status or decline to disclose

Examples of disabilities are provided at the end of the disclosure form

Program Registration and Apprenticeship Agreement Office of Apprenticeship	U.S. Department of Labor Employment and Training Administration	
Voluntary Disability Disclosure		OMB No. 1205-0223 Expiration Date: 07/31/2027
<p><u>Please check one of the boxes below:</u></p> <p><input type="checkbox"/> YES, I HAVE A DISABILITY (or previously had a disability)</p> <p><input type="checkbox"/> NO, I DON'T HAVE A DISABILITY</p> <p><input type="checkbox"/> I DON'T WISH TO ANSWER</p>		
Your name: _____		
Date: _____		
Why are you being asked to complete this form?		
<p>Because we are a sponsor of a registered apprenticeship program and participate in the National Registered Apprenticeship System that is regulated by the U.S. Department of Labor, we must reach out to, enroll, and provide equal opportunity in apprenticeship to qualified people with disabilities.^[1] To help us learn how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. Completing this form is voluntary, but we hope that you will choose to fill it out. If you are applying for apprenticeship, any answer you give will be kept private and will not be used against you in any way.</p>		
<p>If you already are an apprentice within our registered apprenticeship program, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our apprentices at the time of enrollment, and then remind them yearly, that they may update their information. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.</p>		
How do I know if I have a disability?		
<p>You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition. Disabilities include, but are not limited to: blindness, deafness, cancer, diabetes, epilepsy, autism, cerebral palsy, HIV/AIDS, schizophrenia, muscular dystrophy, bipolar disorder, major depression, multiple sclerosis (MS), missing limbs or partially missing limbs, post-traumatic stress disorder (PTSD), obsessive compulsive disorder, impairments requiring the use of a wheelchair, and intellectual disability (previously called mental retardation).</p>		

Registered Apprentices Self-Identifying as Having a Disability



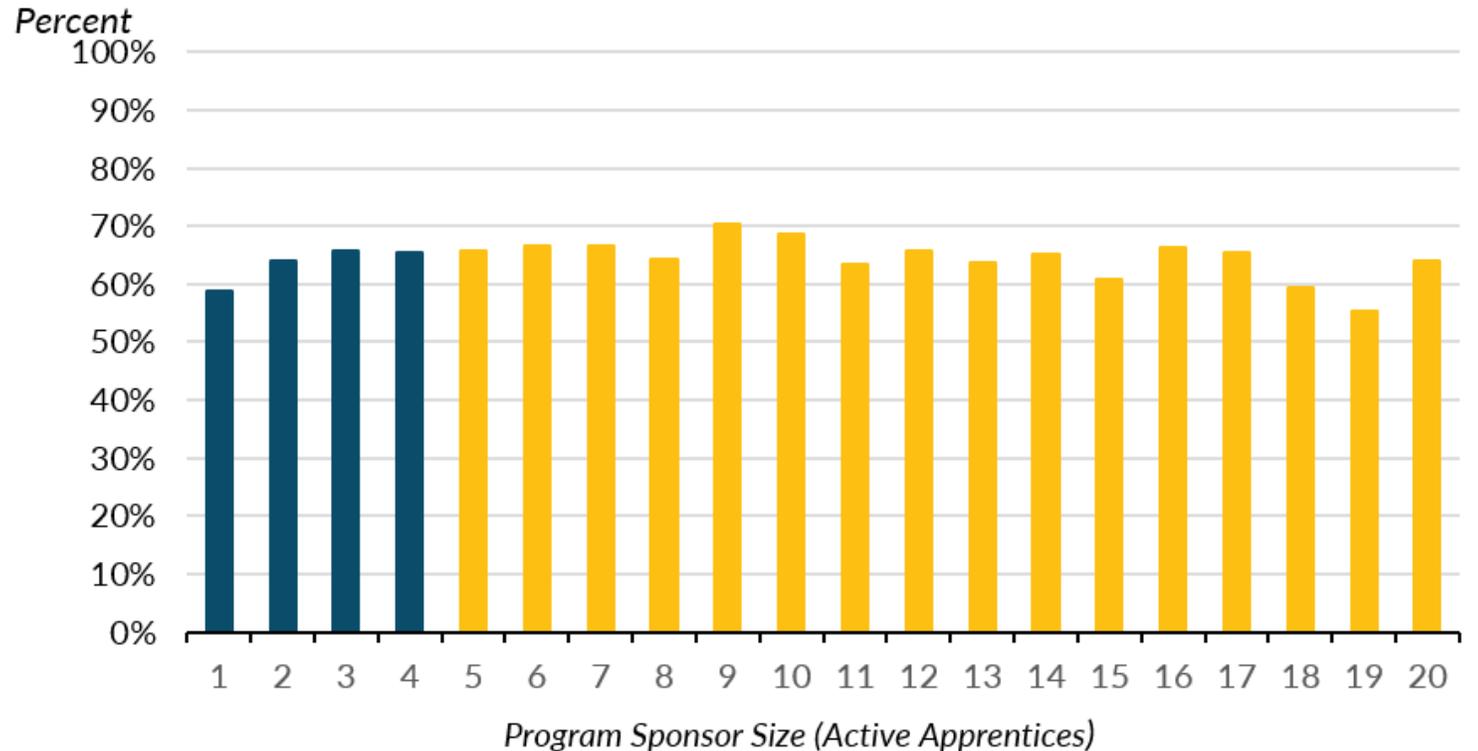
- 641,044 active registered apprentices in FY 2024
- 325,916 registered apprentices provided a disability status in FY 2024
- 6,805 of those registered apprentices self-identified as having a disability.

Only 1.06% of apprentices self-identified as having a disability in FY 2024

Why is self-reported disability so far below the aspirational goal of 7%?

- Apprenticeship programs may not be sufficiently inclusive and accessible at each stage.
- **Non-response is an option:** 41% of apprentices in 2022 did not provide their status
- **Apprentices may be suspicious of the use of the information:** 58% of individuals thought a similar federal form would be used to reduce the number of people with disabilities hired.

Percent of Active Apprentices Reported by Program Sponsors as Providing a Disability Status by Program Sponsor Size, 2022



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Exclusions from the requirement to invite apprentices to disclose are not an obstacle to self-identification of disability.

Smaller, exempt programs report apprentices' disability status at the same rate as larger programs

Interviewed apprenticeship partners recommended learning from design features of the Office of Federal Contract Compliance Programs form

How do I know if I have a disability?	
<p>You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.</p>	
<p>Disabilities include, but are not limited to:</p>	
<ul style="list-style-type: none">• Blindness• Deafness• Cancer• Diabetes• Epilepsy	<ul style="list-style-type: none">• Autism• Cerebral palsy• HIV/AIDS• Schizophrenia• Muscular dystrophy
<ul style="list-style-type: none">• Bipolar disorder• Major depression• Multiple sclerosis (MS)• Missing limbs or partially missing limbs	<ul style="list-style-type: none">• Post-traumatic stress disorder (PTSD)• Obsessive compulsive disorder• Impairments requiring the use of a wheelchair• Intellectual disability (previously called mental retardation)
<p><u>Please check one of the boxes below:</u></p>	
<input type="checkbox"/>	YES, I HAVE A DISABILITY (or previously had a disability)
<input type="checkbox"/>	NO, I DON'T HAVE A DISABILITY
<input type="checkbox"/>	I DON'T WISH TO ANSWER
<input type="text"/>	<input type="text"/>
Your Name	Today's Date

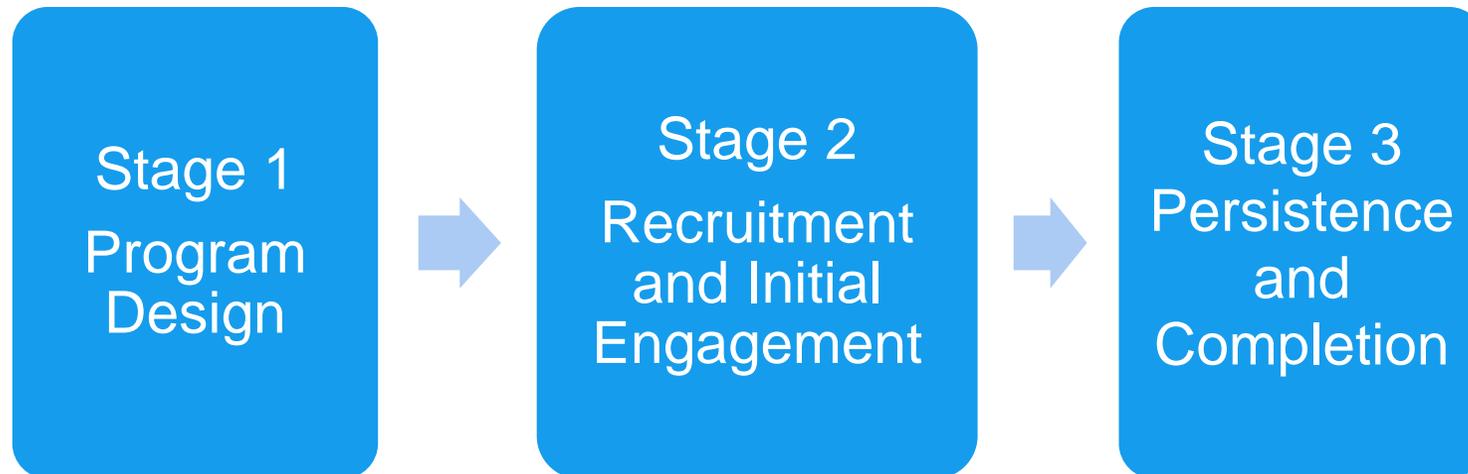
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The Inclusive Apprenticeship Ecosystem

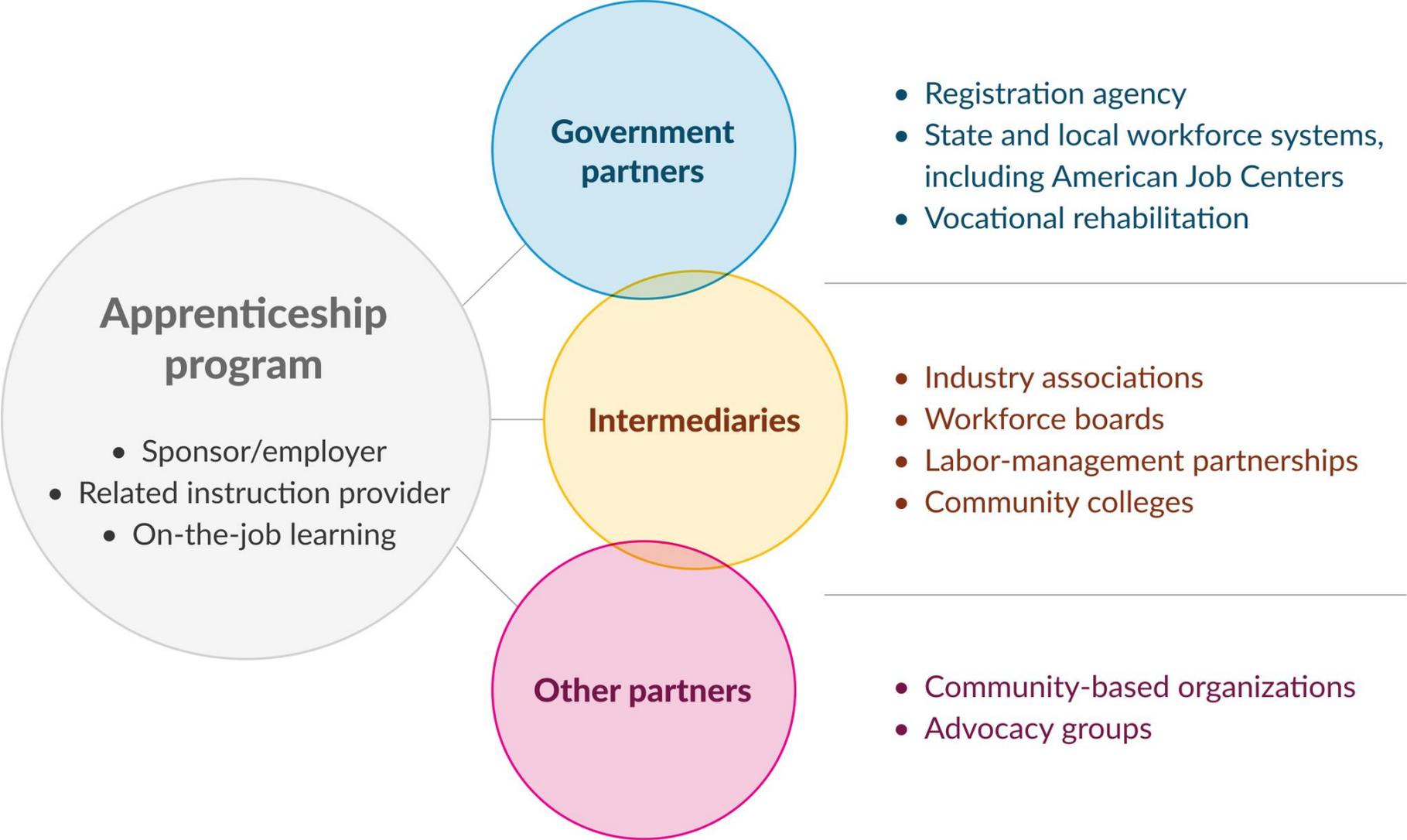
Overview of Inclusive Apprenticeship Ecosystem

Inclusive apprenticeship is not a single step—but a series of steps in which inclusive practices build on each other.



Equitable access to apprenticeship, or intentionally encouraging apprentices who reflect the diversity of the community, **“is not accomplished by simply providing an open door”** (Mollica and Simon 2021)

Inclusive Apprenticeship Ecosystem Partners



Stage 1: Create or Adapt an Apprenticeship Program to be Inclusive

- **Market** inclusive apprenticeship to employers
 - Intermediaries; American Job Centers; Vocational Rehabilitation can recruit
- Hone the **message** to employers
 - Business case for inclusive hiring
 - Dispel misconceptions about the cost of accommodations
 - Highlight funding available

Stage 1: Create or Adapt an Apprenticeship Program to be Inclusive (cont.)

- Program design partners
 - **Intermediaries** can apply their subject matter expertise and experience with inclusive practices to apprenticeship
 - **State apprenticeship staff** can help employers develop inclusive programs
 - **Employers and RI providers** can incorporate Universal Design practices
 - **Employers** can provide training for mentors

Stage 2: Recruitment and Initial Engagement of Apprentices

- Create Inclusive Job Announcements: ecosystem partner recommendations
- Disseminate Job Announcements via social media, ecosystem partners; expand applicant pool
- Interview Candidates: Include information about access and accommodations in all correspondence; train interviewers and hiring managers
- Initial Engagement During Onboarding: create internal structures to proactively encourage self-disclosure

“We don’t just say that access is important. By sharing it over and over again, we can reinforce the idea that there’s action behind our words”

- IT Intermediary

Stage 3: Apprentice Persistence and Completion

Type	Component of Apprenticeship	Example Accommodations
Academic Support	Related instruction	Universal Design for Learning, Tutoring
Worksite Adjustments and Workplace Flexibility	On the job learning	Equipment modifications; chairs; step stools; adjustable desk ramps; remote, hybrid, or part-time work options; accessible facilities; breaks
Adaptive Technology and Supportive Services	Related instruction and on the job learning	Alternative keyboards and mouse interfaces, scanners, screen readers, and software; assistance with basic needs including housing, childcare, and transportation

Stage 3: Apprentice Persistence and Completion (cont.)

- Mentor training

“We encourage all managers and mentors to be familiar with their internal accommodation processes, because often apprentices will disclose to a manager before they would go directly to HR so it's important that our managers know that information.” –IT Intermediary

- Regular mentor check-ins

- Affinity groups

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Where to Find Project Publications

- **Urban Institute**

<https://www.urban.org/>

- **U.S. Department of Labor Office of Disability Employment Policy**

<https://www.dol.gov/agencies/odep/program-areas/apprenticeship>

Publications:

- 4 briefs

- Clean Energy Apprenticeships and People with Disabilities
- Federal and State Inclusive Apprenticeship Policies
- Practices to Increase Employer Adoption of Inclusive Apprenticeship
- Voluntary Self-Identification of Disability in Apprenticeship Programs

- Final Report

For More Information

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