



December 16, 2022

Dear Presidents and Registered Apprenticeship Sponsors:

As you may know, Registered Apprenticeship and Youth Apprenticeship opportunities are growing rapidly in Maryland. As of December 1, 2022, Maryland is home to over 180 active Registered Apprenticeship programs with over 12,000 apprentices employed. Similarly, as of December 2022, 22 of the 24 Maryland local school systems are approved for the Apprenticeship Maryland Program (AMP), a youth apprenticeship initiative specific to Maryland. Registered Apprenticeships and Youth Apprenticeships are both coordinated through the Maryland Apprenticeship and Training Council (MATC<sup>1</sup>), which receives oversight and administrative support from the Maryland Department of Labor (MD Labor).

The Maryland Higher Education Commission (MHEC) does not directly oversee instruction that takes place as part of an Apprenticeship Program; rather, the quality and breadth of the instruction is under the authority of MATC and MD Labor. However, when Maryland colleges and universities are involved in the provision of this instruction, MHEC has regulatory standards and requirements regarding the evaluation and awarding of credit for prior learning and the provision of State funding that may support this instruction.

MATC recently convened a committee, comprised of community college leadership, MHEC, MD Labor, and MATC members, to discuss the roles of each agency in the oversight of Registered and Youth Apprenticeship programs. As a result of those discussions, the committee found that guidance regarding the relationship between sponsors and colleges would be helpful to ensure that students have every opportunity to be successful. Therefore, MHEC and MD Labor are jointly issuing this guidance.

This guidance is intended to:

- (a) standardize practices among colleges and universities; and
- (b) clarify the roles and responsibilities of institutions of higher education and Registered Apprenticeship Sponsors.

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<sup>1</sup> The Maryland Apprenticeship and Training Council is established by Maryland law and consists of 12 individuals appointed by the Governor. The Council formulates apprenticeship policies, registers standards and agreements, determines which occupations are apprenticeable, and formulates and adopts standards of apprenticeship that safeguard the welfare of all apprentices. The Council also recommends approval or denial of applications from sponsors to establish Registered Apprenticeship and oversees the establishment of Youth Apprenticeship programs.

## **How does the Registered Apprenticeship model work?**

Registered Apprenticeship is a proven model of job preparation that pairs paid on-the-job training<sup>2</sup> (OJT) with formal instruction (referred to as “Related Instruction” or “RI”) to progressively increase workers’ skill levels within an occupation, as well as their wages.

Registered Apprenticeship is a business-driven model that provides an effective way for employers to recruit, train, and retain highly skilled workers. It allows employers to develop and apply industry standards to training programs, thereby increasing the productivity and quality of the workforce. As an “earn and learn” strategy, Registered Apprenticeship offers job seekers immediate employment opportunities with sustainable wages and advancement along a career pathway, as well as occupational credentials.

While Registered Apprenticeship requirements can vary from state to state, all consist of the following five core components:

1. **Business Involvement** – Businesses are the foundation of every Registered Apprenticeship program. The skills needed for workforce success, provided through business input, form the core of the model. Businesses must play an active role in building Registered Apprenticeship programs and are involved in every step of their design and execution.
2. **On-the-Job Training (OJT)** – Every Registered Apprenticeship program includes structured OJT. Companies hire Registered Apprentices and provide hands-on training from an experienced mentor. This training is developed by mapping the skills and knowledge that the Registered Apprentice must learn over the course of the program to become fully proficient at the job.
3. **Related Instruction (RI)** – Apprentices receive formal, classroom-style training called “Related Instruction” to complement the OJT. This instruction helps refine the technical and academic skills that apply to the job. A community college, technical school or college, an apprenticeship training school, non-profit, community-based organization (CBO), industry, labor organization, business association, or business may offer Related Instruction. The instruction can be provided at the school, online, or at the work site.
4. **Rewards for Skill Gains** – Registered Apprentices receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate Registered Apprentices as they advance through training and become more productive and skilled at their job.
5. **National Occupational Credential** – Every graduate of a Registered Apprenticeship program receives a nationally recognized credential, referred to as a certificate of

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<sup>2</sup> Also known as “on the job learning” (OJL).

completion. This portable credential signifies that the Registered Apprentice is fully qualified to successfully perform an occupation. Many Registered Apprenticeship programs, particularly in high-growth industries such as healthcare, advanced manufacturing, and transportation, also offer interim credentials as Registered Apprentice master skills included in their career pathway.

In other words, Registered Apprenticeship offers paid, on-site OJT that is paired with RI and results in a skilled credential.

## **What kind of apprenticeship opportunities are available in Maryland?**

### *Registered Apprenticeship*

In Maryland, Registered Apprenticeship opportunities must be registered with MATC, which provides regulatory oversight over both OJT and RI. Every Registered Apprenticeship is coordinated by a “Sponsor,” who manages the OJT and RI involved in the Registered Apprenticeship opportunity. The amount of OJT and RI may vary based on the opportunity.

### *Youth Apprenticeship*

This is an “earn and learn” work model for 11<sup>th</sup> and 12<sup>th</sup> graders, available through local high schools. Students in Youth Apprenticeship programs receive supervised, structured OJT from a mentor and work a minimum of 450 hours with an approved employer, while receiving RI through their high school or, if vetted by the Maryland State Department of Education and approved by the employer, through a community college, online provider, association, or union. In addition to earning industry credentials, Youth Apprenticeships also offer high school credit.

### *School-to-Apprenticeship*

High school students who are 16 or 17 may participate in a regular Registered Apprenticeship, rather than part of the Youth Apprenticeship Program, if their parent or guardian consents, and if the opportunity is coordinated with their high school class schedule. Youth who work as Registered Apprentices begin by working part-time to accrue OJT hours and will receive RI in a variety of possible settings. After high school graduation, participants start working full-time in the Apprenticeship.

## **What does it mean to be a Register Apprentice Sponsor?**

A Registered Apprenticeship *sponsor* can be a single employer, an association, or a Joint Apprenticeship and Training Committee (JATC) that has been approved by the MATC. A sponsor is responsible for managing all components of a Registered Apprenticeship, including meeting the Standards of Apprenticeships such as:

- Maintaining and updating Standards of Apprenticeship
- Recruiting, interviewing, testing, and training apprentices
- Providing Related Instruction
- Evaluating progress of apprentices
- Maintaining all documentation to include items such as On the Job Training, Related Instruction, and progressive pay increases.

A Sponsor is any employer, association, committee, or organization that operates a Registered Apprenticeship Program. The Sponsor assumes the full responsibility for administration and operation of the Registered Apprenticeship program. Sponsors can be a single business or a consortium of businesses. Alternatively, the sponsor can be a workforce intermediary, such as an industry association or a labor-management organization. Community colleges and community-based organizations can also serve as sponsors of apprenticeship programs.

Sponsors design and execute apprenticeship programs, provide jobs to apprentices, oversee training development, and provide hands-on learning and technical instruction for apprentices. The programs operate on a voluntary basis and they often receive support by collaborating with community-based organizations, educational institutions, the workforce system, and other stakeholders.

### **Can a college be a Registered Apprenticeship Sponsor?**

A college can sponsor a Registered Apprenticeship. To do so, the college must submit an application for approval by the Maryland Apprenticeship and Training Council to be a *sponsor*. There are two ways a college can apply to become a sponsor. First, they can apply to be the sponsor of their own program conducted for their own staff; for example, employees of their institution’s facilities department. Second, colleges can apply to become a “group” sponsor. Colleges that become a group sponsor will have a program approved where the college will manage it on behalf of a group of employers in similar occupations/industries. This is the most common model utilized by community colleges in Maryland, with six colleges currently approved as Registered Apprenticeship Sponsors. Colleges or universities interested in registering a Registered Apprenticeship program as a *sponsor* should visit the Maryland Department of Labor website<sup>3</sup> for more information.

A college is not a sponsor if the college only provides space for a Register Apprenticeship or only teaches Related Instruction (RI) as a component of a Registered Apprenticeship.

### **When not a Sponsor, what is the role of a college or university in Registered and/or Youth Apprenticeships?**

Colleges and universities participate in Registered Apprenticeship both directly and indirectly. Direct involvement may include being a Registered Apprenticeship Sponsor, a RI provider, or even an OJT work site. Indirect involvement may include provision of credit for prior learning

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<sup>3</sup> <https://www.dllr.state.md.us/employment/appr/apprbecomesponsor.shtml#apprdef>

for RI, OJT, or both, even when the college or university has not been directly involved in the Registered Apprenticeship opportunity. Additionally, colleges may support a Registered Apprenticeship by providing or renting space to Apprenticeship Sponsors for RI that is not provided by the college.

#### *Providing RI - Open Courses*

A college or university's most likely participation in a Registered Apprenticeship is as an RI provider. This may happen in two ways. One is when the Registered Apprenticeship Sponsor requires an apprentice to enroll in a for-credit or noncredit course that is already offered by the college or university. Because students are enrolling in the college's regularly scheduled courses, the college does not need any agreement with the Registered Apprenticeship Sponsor and, indeed, may not even be aware that a student is a Registered Apprentice. In this instance, these students would be included in the full-time equivalency (FTE) metric just as any other student would.

#### *Providing RI - Closed Courses*

A college or university may also provide related instruction (RI) in "closed" courses in which only Registered Apprentices can enroll. This can be either a currently offered course for which enrollment for a specific section is limited to Apprentices or it may be a course that is designed specifically for the Registered Apprenticeship. This arrangement would require the college to enter into an agreement with the Registered Apprenticeship Sponsor to provide the closed course, as they would with other closed courses offered to an employer, trade association, or other entity.

In this scenario, the college selects and hires the instructor and designs the course, though this would be done in consultation with the Registered Apprenticeship Sponsor. Course design must comply with Registered Apprenticeship RI standards.<sup>4</sup> When RI is provided by the college, the instructor should be currently employed by the college or hired by the college or university to teach the RI. The Sponsor may provide the funds for the instructor's salary to the college, but the instructor must be employed and supported by the college, whether part-time, full-time, or on an adjunct basis.

As with any other closed or contracted course, the course could take place at a location that is off-campus, such as the employer's offices, as long as the college complies with all relevant MHEC regulations regarding off-campus courses. Similarly, these students would be registered with the college and included in FTE calculations as would any other student in a closed course.

In other words, for a college to provide RI, the following criteria should be met:

- the instructor should be a full-time, part-time, or adjunct faculty-employee of the college;
- the apprentice should be a registered student with the college or university and enrolled in a course; and,

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<sup>4</sup>[COMAR 09.12.43](#)

- the apprentice/student should be provided with a transcript (or equivalent) from the college or university when the course is completed.

### *Providing Space Only*

Some colleges provide space for RI to occur, either free or for a cost, but do not provide the curriculum or instructor for the course. In this instance, the college is NOT considered an RI provider. Therefore, the course is not being offered by the college and the students should not be enrolled in the college. Students who attend RI that occurs on a college campus, but have not enrolled in the course through the college, MAY NOT be counted toward a college's FTE when reporting to MHEC.

Rather, this situation should be treated in the same manner as any other provision of space to an organization or for an event. The fact that the space is being provided for RI does not mean that the college is offering the course or participating in the Registered Apprenticeship.

### **How can an apprentice earn college credit?**

#### *Earning Credit while an Apprentice*

A student can directly earn college credit when the RI is provided by a college or university. For example, the RI for a particular Registered Apprenticeship program may require knowledge in 'engineering design and graphic communications.' A college may offer an "Introduction to Engineering Design" course which meets the requirements of the Related Instruction required by a Registered Apprenticeship. A student that completes the "Introduction to Engineering Design" would have earned 3 or 4 credits (likely towards a degree or certificate) at that college. No specific agreement regarding the articulation of credit for prior learning at that college is needed because the student would have earned college credit just by completing the formal course.<sup>5</sup> In this model, students/apprentices should be provided clear academic advising on how the credit-bearing RI course(s) may be applied to a specific certificate or degree program and a pathway to obtain that certificate or degree. In some cases, an associate degree (or higher) may be obtained during the course of the Registered Apprenticeship program's RI component.

#### *Awarding Credit for Prior Learning after the Completion of a Registered Apprenticeship*

Awarding credit for prior learning is a common tool that colleges use to support students who have non-transcripted prior knowledge or skills obtained before enrolling in a specific program of study. Institutions should have a policy regarding the process and standards for awarding credit for prior learning.

Awarding credit specifically for the completion of a Registered Apprenticeship (i.e., prior learning) is a specific type of "prior learning" in which college credit can be awarded. When it

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<sup>5</sup> If a student transfers the credit to another college or university, they would be considered "transferring credit" and different rules and regulations would apply.

comes to Registered Apprenticeships, the RI and OJT can be evaluated by a college or university for the awarding of college credit. Doing so can help students complete a formal certificate or degree at a college or university.

To ensure transparency and equity for all students/apprentices, an agreement between Sponsors and colleges regarding the awarding of credit for prior learning (i.e., non-transcribed learning experiences) is strongly encouraged. Agreements should be signed by the president or chief academic officer of the institution and the president, director, chief executive officer, or other authorized representative of a Registered Apprenticeship. An agreement may include additional provisions regarding:

- a. Procedures for admissions, registration, and advising into a specific college and program;
- b. Access to student services, including financial aid;
- c. Remaining cost of tuition; and
- d. Other relevant information as it pertains to the transfer of prior learning to academic credit (e.g., deadlines, time-limits of knowledge according to the industry or currency of knowledge, specific program of study).

A final, signed copy of an agreement between a sponsor and a college must be deposited with the Maryland Higher Education Commission and the Maryland Department of Labor.

Awarding credit for prior learning should occur *after* the completion of a Registered Apprenticeship program (i.e., when an apprentice has earned a Certificate of Completion of Apprenticeship from the Maryland Department of Labor).

When it comes to OJT and RI through a Registered Apprenticeship program, the awarding of credit for prior learning should be at no cost to the completed student/Registered Apprentice. The process for a completed student/Registered Apprentice to obtain credit for prior learning should be transparent, accessible, and established through an agreement. Additionally, institutions should be systematic and thoughtful about how credits awarded for prior learning may transfer to another college or university.

Again, the awarding of credit for prior learning through a Registered Apprenticeship can be established through an agreement between the sponsor and the college, through an institutional policy, or both.

### **How can a Sponsor and a college or university formalize their partnership?**

Colleges and sponsors are strongly encouraged to develop agreements for:

1. Related Instruction as required by a Registered Apprenticeship, if a college or university is providing the Related Instruction; or,
2. Awarding of academic credit for prior learning received during a Registered Apprenticeship program for the completion of specific courses at an institution of higher education.

**What is the 2025 55% Completion Goal and how can Apprenticeships support this goal?**

Maryland, like many other states, has a degree completion goal. Established in 2013, the Maryland General Assembly set a goal that by 2025, 55% of Maryland residents would hold an associate degree or higher.<sup>6</sup> Apprenticeship sponsors can help Maryland achieve that goal by establishing articulation agreements with colleges and universities for the awarding of credit for prior learning for OJT, RI, or both. Also, colleges and universities can establish institutional policies in which credit can be awarded for prior learning from the experience and instruction a Registered Apprenticeship can provide.

We hope you find this guidance helpful. We encourage you to visit MD Labor’s website<sup>7</sup> for more information regarding Registered and Youth Apprenticeships. Thank you for all you do to support the education and training of Marylanders for a stronger workforce that leads the nation in innovation.

Sincerely,



Tiffany P. Robinson  
Secretary  
Maryland Department of Labor



Dr. James D. Fielder  
Secretary  
Maryland Higher Education Commission

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<sup>6</sup> A copy of MHEC’s most recent report on our progress towards the 55% completion goal can be found here: [https://dlslibrary.state.md.us/publications/JCR/2022/2022\\_196-197\\_2022.pdf](https://dlslibrary.state.md.us/publications/JCR/2022/2022_196-197_2022.pdf)

<sup>7</sup> <https://www.dllr.state.md.us/employment/appr/>