Purpose: To inform the staff of OA and the State Apprenticeship Agencies (SAA), Registered Apprenticeship program sponsors (Sponsor) and other Registered Apprenticeship partners of the replacement of Circulars 95-05 and 2005-03. The purpose of this Circular is to establish compliance and practical design policy for the time-based, competency-based and hybrid approaches for completion of an apprentice's term of apprenticeship. These policies are intended to facilitate Sponsors’ efforts to develop and implement program standards that fully integrate apprentices’ on-the-job learning and related instruction into the term of apprenticeship, and to assist with the transition from time-based to hybrid and competency-based training approaches.

Background: An apprenticeable occupation must meet the requirements of Title 29 Code of Federal Regulations (CFR) part 29, Section 29.4, Criteria for apprenticeable occupation.

§ 29.4 Criteria for apprenticeable occupations

An apprenticeable occupation is one which is specified by industry and which must:

(a) Involve skills that are customarily learned in a practical way through a structured, systematic program of on-the-job supervised learning;
(b) Be clearly identified and commonly recognized throughout an industry;
(c) Involve the progressive attainment of manual, mechanical or technical skills and knowledge which, in accordance with the industry standard for the occupation, would require the completion of at least 2,000 hours of on-the-job learning to attain; and
(d) Require related instruction to supplement the on-the-job learning.

Section 29.5(b)(2) permits sponsors to select one of three methods for measuring the completion of the “term of apprenticeship.”

- “Competency-based approach” [Section 29.5(b)(2)(ii)] provides for the apprentice's progression through apprenticeship through the acquisition of identified and measured competencies.
- “Time-based approach” [Section 29.5(b)(2)(i)] provides for skill acquisition through the apprentice's completion of at least 2,000 hours of on-the-job learning as described in the work process schedule.
- “Hybrid approach” [Section 29.5(b)(2)(iii)] provides for the measurement of the
apprentice’s skill acquisition through a combination of specified minimum hours of on-the-job learning and the successful demonstration of identified and measured competencies.

Per Section 29.5(b)(2)(iv), the program sponsor makes the determination of the appropriate approach, subject to approval by the Registration Agency of the determination as appropriate to the apprenticeable occupation for which the programs standards are registered.

**COMPLIANCE AND DESIGN GUIDLINES:**

Competency means the attainment of manual, mechanical or technical skills and knowledge, as specified by an occupational standard and demonstrated by an appropriate written and hands-on proficiency measurement.

**All training approaches for completion of a term of Registered Apprenticeship have the following characteristics:**

- Competencies should be identified and defined through a valid occupational/job task analysis method and directly related to the occupation and the on-the-job learning. Occupations need to be a minimum of 2,000 hours of on-the-job learning, as required by Section 29.4, Criteria for an apprenticeable occupation, and supplemented with the required related technical instruction.

- Time allocations for the workplace activities listed in the work process schedule reflect the training approach utilized.
  - A competency-based approach **does not** require time/hours to be assigned.
  - A hybrid approach requires a minimum and maximum range of time/hours assigned.
  - A time-based approach requires the approximate time/hours.

- Measures or tests of competency attainment and demonstrated skills performance are the responsibility of the sponsor and should be observable, repeatable and agreed to in advance.
  - The methods used to measure or test competency attainment will be defined in the standards of apprenticeship.
  - Assessments should directly link workplace performance requirements with the foundational knowledge and skills (competence) of the apprentice.
  - Assessments on-the-job and off-the-job should be carried out on a structured on-going basis, and include course work, practical assessments and theoretical assessments. Written and practical end-testing may also be utilized.
- The sponsor should consider utilizing in-house or third-party industry experts as assessors and evaluators of the apprentice’s accomplishments.

- Related instruction coursework provides apprentices with the technical, workplace, and knowledge competencies that apply to the job.
  - Theory and task knowledge enable the apprentice to understand the work performed on the job. An analysis is conducted to determine if the skills required in the workplace match the theory and course work that is taught.
  - Related instruction may be front-loaded, segmented, or delivered concurrently with the on-the-job learning. The sequence of related instruction courses should align with the sequence of learning and training required on the job.
  - A minimum of 144 hours for each year of apprenticeship is recommended.
  - Related Instruction may be delivered in a classroom, through academic, vocational, career and technical education courses, and/or via web-based/online courses of equivalent value as approved by the Registration Agency.

(See Attached Dental Assistant DACUM Job Task Analysis and Competency-based Example)

Competency-based Approach:

The competency-based approach measures skill acquisition through the individual apprentice’s successful demonstration of acquired skills and knowledge, as verified by the sponsor. Programs utilizing this approach must still require apprentices to complete an on-the-job learning component of Registered Apprenticeship. The program standards must address how on-the-job learning will be integrated into the program, describe competencies, and identify an appropriate means of testing and evaluation for such competencies.

Competency-based approaches have an open entry and exit design, which enables apprentices to accelerate the rate of competency achievement or extend the term of training in order to meet performance-based completion requirements.

Hybrid Training Approach:

Sponsors that choose to utilize a hybrid approach must comply with these guidelines for the competency-based portion of the apprentice’s term of apprenticeship. The hybrid approach specifies a minimum and maximum range of hours of on-the-job learning for each task or
job requirement, plus the successful demonstration of acquired skills as described by the task statements listed in the work process schedule.

Under the hybrid approach, the term of the occupation cannot be less than 2,000 hours of on-the-job learning, per Section 29.4 Criteria for apprenticeable occupations. However, once a term of a hybrid occupation has been Approved the range of hours may be adjusted upward or downward by twenty-five (25) percent, but not both ways. For example: a hybrid occupation with a range of 3,000 to 4,000 hours can be increased with a range of 4,000 to 5,000 hours.

A minimum/maximum range of hours would also give the apprentice an opportunity to accelerate the completion of the apprenticeship program with the appropriate test and evaluations provided to the apprentice, by the sponsor.

*(See Attached Dental Assistant Hybrid-based Example)*

**Time-based Approach:**

A time-based occupation requires completion of a minimum of 2,000 hours, which includes an outline of the specific work processes in which the apprentice will receive supervised work experience and the allocation of approximate amount of time to be spent in each task or job requirement in the work process schedule for that occupation. The term of an approved time-based occupation can be increased or decreased by 25 percent. The term of a time-based occupation cannot be less than 2,000 hours.

*(See Attached Dental Assistant Time-based Example)*

**Table 1: Training Approach Comparison:**

<table>
<thead>
<tr>
<th>Characteristics</th>
<th>Time-based</th>
<th>Hybrid</th>
<th>Competency-based</th>
</tr>
</thead>
<tbody>
<tr>
<td>Must be an approved apprenticeable occupation as required in Section 29.4.</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Occupation term requires a minimum of 2,000 hours (one-year) of on-the-job learning.</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Requirement</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>An apprentice must be registered in an approved competency-based occupation for twelve (12) calendar months of on-the-job learning.</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Work process schedule task statements are derived from a valid occupation/job task analysis method (expert workers, and subject matter experts).</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Outline of the specific work processes and the approximate time requirement for each individual work process.</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Outline of the specific work processes and the minimum - maximum time requirement for each individual work process.</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Performance measures are developed from occupation/job task analysis.</td>
<td>N/A</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Time-based assessment for completion of workplace competencies.</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Performance assessment of workplace skills and task knowledge.</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Written assessment of theory, knowledge, and academic competencies.</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>The Related Instruction component must comply with all of the provisions of Section 29.5(b)(4).</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Related instruction aligns with technical, workplace and academic competencies that apply to the job.</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Maximum allowable credit for prior work experience is 50 percent of training.</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>The apprentices must be evaluated by the employer to determine the competencies they are proficient in or have accomplished to grant them allowable credit for prior work experience.</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Certificate of Completion will be issued upon satisfactory completion of the requirements of the training approach, as described in the approved Standards of Apprenticeship.</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Sponsor maintains record of work-based</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>
training, performance assessments and related instruction.

Certificate of Completion of Apprenticeship - Minimum Requirements:

The Certificate of Completion of Apprenticeship will be issued by the Registration Agency to those registered apprentices certified and documented by the Sponsor as successfully completing the apprentice training requirements for the competency-based, hybrid, or time-based approach, as specified in the Standards of Apprenticeship. The apprentice is also required to have worked under the Program Sponsor as a registered apprentice, in the apprenticeable occupation for a minimum of six (6) months, exclusive of any prior experience granted.

The Certificate of Completion of Apprenticeship will be issued by the Registration Agency to those registered apprentices certified and documented by the Sponsor as successfully completing the apprentice training requirements for the hybrid, or time-based approach, as specified in the Standards of Apprenticeship. The apprentice is also required to have worked under the Program Sponsor as a registered apprentice, in the apprenticeable occupation for a minimum of 1,000 hours, exclusive of any prior experience granted.

ACTION: This policy is intended to assist OA, SAAs and Sponsors and therefore will be utilized by the OA and SAAs to determine if the use of the competency-based approach is suitable for the specific recognized apprenticeable occupation. These policies are designed to ensure that every apprentice has the opportunity to gain all of the necessary knowledge, skills and abilities no matter which approach to the completion of their term of apprenticeship is preferred by their Sponsor.

The OA and SAA staff should familiarize themselves with this Circular.

If you have any questions, please contact Franchella Kendall at (202) 693-3813.

NOTE: This circular is being sent via electronic mail.

Attachments

Sample Curriculum Gap Analysis Tool.doc