

Preparing for a U.S. DOL OA Program Review

PURPOSE: To provide the company with a guideline of when to expect a U.S. DOL OA program review and how to prepare.

What is a Registered Apprenticeship Program Review (APR)?

An apprenticeship program review is a review of all aspects of a registered apprenticeship program's performance. The U.S. DOL's Office of Apprenticeship conducts program reviews to assess the overall condition of a sponsor's program and compliance with its registered Standards and the relevant federal regulations (see below), including but not limited to determining if apprentices are receiving:

- On-the-job training in all phases of the apprentice-able occupation.
- Scheduled wage increases consistent with the sponsor's registered Standards.
- Related instruction through appropriate curriculum and delivery systems.
- Equal opportunity in all aspects of the apprenticeship program, in accordance with relevant federal regulations (see below).
- Affirmative action requirements (as applicable).

Program reviews allow the Office of Apprenticeship the opportunity to provide support and technical assistance to ensure sponsors are meeting their obligations complying with the following federal regulations governing RAPs:

- **Title 29 CFR part 29**, subpart A (Registered Apprenticeship Programs)
- **Title 29 CFR part 30** (Equal Employment Opportunity in Apprenticeship)

A program review has three components:

- **Desk Review** - the Apprenticeship Training Representative (ATR) gathers and reviews the RAP's documents and data currently on file or in RAPIDS to get familiar with the information and prepare for the in-person review.
- **In-Person Review** - a multi-faceted assessment that is designed to help the ATR gain a complete picture of a registered apprenticeship program's overall operations and an understanding of the apprentices' experiences within the program. Conducted either on-site at the sponsor's location, participating employers' worksites, and/or related-instruction venues; or remotely, at the registration agency's discretion.
- **Analysis of Findings** - the analysis of the sponsor's records and results of the in-person review. The ATR will carefully review the information gathered and determine their findings as to whether there are any deficiencies that must be corrected by the sponsor.

See [Apprenticeship Program Review Quick Reference Guide](#) for full description of each.

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Sponsor Responsibilities

Responsible Party: Apprenticeship Program Manager (or appropriate signatory to the sponsor's Program Standards)

- Main point of contact to the Department of Labor's Office of Apprenticeship.
- Will work with ATR to schedule date for the review.
 - Program Review schedule:
 - End of 1st year of program operation (Provisional Apprenticeship Program Review)
 - End of 1st full training cycle
 - Subsequently at least once in every 5-year span (Extended Apprenticeship Program Review)
 - An additional review will be scheduled outside of the normal review schedule if the registration agency receives:
 - Credible information of a sponsor's failure to conform to its Standards or to relevant CFR regulations - *and/or* -
 - A written complaint of a sponsor's failure to conform.
- Will work with ATR to develop Affirmative Action Plan (AAP) Statement after 1st year of program operation (for programs with more than 5 apprentices).
- Will work with ATR to collect information for the Desk Review.
- Present documents showing current journey-worker - to - apprentice ratio and other statistics.
- Work with sites to make sure all documents are always ready for review.
- Arrange for site visits to appropriate company location and related instruction provider, if needed.
- Will work with company leadership to close gaps in any deficiencies found during the Analysis of Findings.
- Will alert ATR when deficiencies have been corrected and schedule any follow-up meetings, as needed.

Apprenticeship Training Committee Responsibilities (or other apprenticeship program manager)

Responsible Party: Training Committee or manager

- Make sure all U.S. DOL OA-related documents are filed appropriately for EACH apprentice and are readily available.
 - Signed ETA 671
 - Signed Apprentice Offer Letter
 - Proof of on-the-job-training (OJT) competency checks with a journey-worker
 - Proof of required related instruction (transcripts, internal training documents, certifications received, etc.) - make sure the curriculum matches what has been reported to U.S. DOL OA
 - Record of apprentice wage increases
 - Progress reports on performance (Performance review forms)
 - Record of any prior learning credit given to apprentice, either related instruction or OJT
- Work with Apprenticeship Program Manager to select one or more apprentices to be interviewed by ATR during program review.
- Arrange a visit to the Related Training Instruction (RTI) Provider site, if required.
- Provide attendance records of apprentices taking classes at RTI Provider.
- Make sure RAPIDS data is current and the Active Apprentice list is up to date.
- Provide proof that apprentice concerns are being addressed.
- Review EEO poster making sure contact information for Complaint Information Notices is correct and make sure all employees are aware.
- Proof that recruitment sourcing follows legal requirements of (29 CFR § 30.3(b)(1)).
- Announcements of all apprenticeship opportunities and how those opportunities were communicated, internally and externally.
- Proof that anti-harassment training is occurring regularly.
- Proof that apprentice selection procedures are fair and equitable.
- Proof that apprentices are offered the yearly opportunity to disclose voluntary disability information.

See [Program Review Checklists](#) for a full list of areas to be audited

See [List of Documents to Prepare for U.S. DOL OA Program Review](#)

Responsible Party: Corporate and Various Company Personnel

