



**POLICY ISSUANCE 2023-11**

**Public Sector Apprenticeship Innovation Fund | November 16, 2023**

**TO:** Division of Workforce Development and Adult Learning (DWDAL) staff, Local Workforce Development Area (Local Area) directors, Registered Apprenticeship Sponsors, and Public Sector Agencies

**FROM:** DWDAL  
Maryland Department of Labor (MD Labor)

**SUBJECT:** Guidance on the Public Sector Apprenticeship Innovation Fund

**PURPOSE:** To provide policy guidance on the Public Sector Apprenticeship Innovation Fund

**ACTION:** American Job Center (AJC) Reemployment Program Directors, central office managers, and Maryland Apprenticeship Training Program staff will ensure all employees are aware of and receive copies of this policy. DWDAL policies are available on the [MD Labor website](#).

**EXPIRATION:** Until canceled or replaced.

**QUESTIONS:**

Christopher MacLarion  
Director, Apprenticeship and Training  
DWDAL  
410-767-3969  
[christopher.maclarion@maryland.gov](mailto:christopher.maclarion@maryland.gov)

Lauren Gilwee  
Director, Policy  
DWDAL  
443-465-9342  
[laurene.gilwee@maryland.gov](mailto:laurene.gilwee@maryland.gov)

\*\*\*\*

**TABLE OF CONTENTS**  
**PUBLIC SECTOR APPRENTICESHIP INNOVATION FUND POLICY**

GENERAL INFORMATION.....3  
    WORKFORCE INNOVATION & OPPORTUNITY ACT..... 3  
    REGISTERED APPRENTICESHIP..... 3  
    REGISTERED APPRENTICESHIP IN MARYLAND ..... 4  
        School-to-Apprenticeship ..... 5  
PUBLIC SECTOR APPRENTICESHIP INNOVATION FUND ..... 6  
    AWARD AND PROJECT DETAILS..... 6  
    ELIGIBLE ENTITIES ..... 6  
    ALLOWABLE ACTIVITIES ..... 7  
        Supportive Services ..... 7  
    PROJECT REQUIREMENTS ..... 9  
    PROHIBITED COSTS..... 10  
APPLY TO THE PUBLIC SECTOR APPRENTICESHIP INNOVATION FUND ..... 11  
    APPLICATION REVIEW ..... 11  
    APPLICATION APPROVAL/DENIAL..... 12  
REPORTING, MONITORING, AND RECORD RETENTION ..... 13  
    REPORTING ..... 13  
    MONITORING ..... 13  
    RECORD RETENTION ..... 14  
FAIR PRACTICES AND ACCESSIBILITY..... 15  
REFERENCES.....16  
    LAW ..... 16  
    REGULATION ..... 16  
    USDOL GUIDANCE..... 16  
    OTHER RESOURCES ..... 17  
ATTACHMENTS.....18

# GENERAL INFORMATION

## WORKFORCE INNOVATION & OPPORTUNITY ACT

The Workforce Innovation and Opportunity Act (WIOA) was signed into law on July 22, 2014 and went into effect July 1, 2015. WIOA supersedes the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. To help both businesses and job seekers meet their needs, the workforce system established under WIOA is integrated by design. WIOA envisions connecting businesses with job seekers through meaningful partnerships among workforce, education, human services, and economic development entities to ensure optimum results and leveraging of resources. The law addresses the needs of job seekers by establishing a workforce system that helps them access employment, education, training, and support services to succeed in the labor market. Through the American Job Centers (AJC)s, WIOA works to address employer demands by matching them to the skilled workers they need to compete in the global economy. Registered Apprenticeship is fully aligned with the employer-focused, work-based training that WIOA envisions. Features of Registered Apprenticeship, including its flexibility, opportunities for immediate earning, and emphasis on partnerships, make it an effective strategy to meet workforce system goals.

## REGISTERED APPRENTICESHIP

Registered Apprenticeship is a proven model of job preparation that combines paid On-The-Job Learning (OJL)<sup>1</sup> with Related Instruction to progressively increase workers' skill levels and 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 productivity and the quality of the workforce. As an "earn and learn" strategy, Registered Apprenticeship offers job seekers immediate employment opportunities that provide sustainable wages and advancement along a career pathway. Graduates of Registered Apprenticeship programs receive nationally recognized, portable credentials, and their training may be applied towards further post-secondary education.

All Registered Apprenticeship programs 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. OJL – Every Registered Apprenticeship program includes structured OJL. Companies hire Apprentices and provide hands-on training from an experienced mentor. This training is developed by mapping the skills and knowledge that the Apprentice must learn over the course of the program to become fully proficient at the job. In Maryland, OJL must consist of no less than 2,000 hours of full-time, W-2 paid employment per year of the Apprenticeship and must take place at the work site under the direction of a highly skilled journeyworker.
3. Related Instruction (classroom style training) – Apprentices receive Related Instruction or classroom style training that complements the OJL. This instruction helps refine the technical and academic skills that apply to the job. Related Instruction may be provided by a community college, technical school or college, an Apprenticeship training school, nonprofit, community-based organization, industry, labor organization, business association, or by the business itself. The instruction may be provided at the school, online, or at the work site. Registered Apprenticeships must include at least 144 hours of Related Instruction per year of the Apprenticeship.

---

<sup>1</sup> Sometimes also referred to as On-the-Job Training (OJT).

4. Rewards for Skill Gains – Apprentices receive increases in pay as their skills and knowledge increase. Progressive wage gains reward and motivate 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 Completion. This portable credential signifies that the 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 Apprentices master skills as part of their career pathway.

In Maryland, Registered Apprenticeships are approved through the Maryland Apprenticeship and Training Council (MATC). More information on requirements for Registered Apprenticeships in Maryland is available at <http://www.labor.maryland.gov/employment/appr/>.

## **REGISTERED APPRENTICESHIP IN MARYLAND**

The U.S. Registered Apprenticeship system is authorized through the National Apprenticeship Act of 1937. The Maryland Department of Labor’s (MD Labor) Division of Workforce Development and Adult Learning (DWDAL) serves as the “State Apprenticeship Agency” and, in consultation with the Maryland Apprenticeship and Training Council, is responsible for the following functions:

1. Registering Apprenticeship programs that meet federal and State standards;
2. Issuing certificates of completion to Registered Apprentices;
3. Encouraging the development of new programs through outreach and technical assistance;
4. Protecting the safety and welfare of Registered Apprentices; and,
5. Assuring that all programs provide high-quality training.

As the State Apprenticeship Agency, DWDAL is committed to ensuring the highest quality Registered Apprenticeships for Maryland’s workers and employers. In addition to overseeing the Apprenticeship system across the State, DWDAL acts as a resource by providing seed funding and technical assistance to businesses committed to investing in their workforce through Registered Apprenticeship.

Given the positive impact that Registered Apprenticeship has for both employers and workers, MD Labor has worked to grow Apprenticeship within fields outside of the “traditional” industries of construction and building trades. Over the last five years, DWDAL has facilitated the expansion of Apprenticeship into non-traditional industries, significantly broadening the pool of workers and employers eligible to participate. The Public Sector Apprenticeship Innovation Fund is a continuation of those efforts.

Lastly, MD Labor is working to align Registered Apprenticeship with the Blueprint for Maryland’s Future,<sup>2</sup> which states that by the 2030-31 school year 45% of Maryland high school graduates will complete “the high school level of a Registered Apprenticeship or another industry recognized credential.” Given this ambitious goal, MD Labor partners closely with the Maryland State Department of Education to ensure that high school students have access to Apprenticeship opportunities through School-to-Apprenticeship.

As described in the “Apply to the Public Sector Apprenticeship Innovation Fund” section below, MD Labor will give preference to applicants to the Public Sector Apprenticeship Innovation Fund that provide Apprenticeship

---

<sup>2</sup> The full text of the legislation can be found here:

<https://mgaleg.maryland.gov/mgawebsite/Legislation/Details/hb1300/?ys=2020rs>

opportunities for young people by partnering with Local Workforce Development Areas and Local Education agencies to integrate School-to-Apprenticeship into their Programs.

### **School-to-Apprenticeship**

School-to-Apprenticeship (STA) is a pathway into Registered Apprenticeship for high school students who are between 16 and 17 years of age. STA is designed to allow high school students to participate in a Registered Apprenticeship program while also completing high school. The STA pathway will allow the student/Apprentice to receive Related Instruction directly from their high school system or from the Registered Apprenticeship Sponsor, as defined in the Standards of Apprenticeship. The Apprentice also will begin their On-the-Job Learning (OJL) while in high school by working directly for the Sponsor or participating/signatory employer. The Apprentice must be properly registered with the Maryland Apprenticeship and Training Program (MATP) and will receive full credit for Related Instruction and OJL hours/competencies accrued during the STA portion of their Registered Apprenticeship. Upon graduation from high school, all Apprentices can continue with their Registered Apprenticeship as full time Apprentices.

# PUBLIC SECTOR APPRENTICESHIP INNOVATION FUND

## AWARD AND PROJECT DETAILS

On June 27, 2023, the USDOL Employment and Training Administration awarded MD Labor \$6,650,620 through the State Apprenticeship Expansion Formula grant. As part of this grant application, MD Labor allocated \$3,000,000 to create, develop, and implement the Public Sector Apprenticeship Innovation Fund, which creates a fund to support the growth of Registered Apprenticeship within Maryland’s Public Sector. The period of performance for the grant is July 1, 2023 – June 30, 2026.<sup>3</sup>

The Public Sector Apprenticeship Innovation Fund is a rolling, competitive grant fund designed to foster the development and expansion of Registered Apprenticeships within Maryland’s public sector workforce. Through the fund, public sector agencies will have access to a flexible funding stream designed to support their specific needs for creating and growing Registered Apprenticeship pathways.

## ELIGIBLE ENTITIES

Public sector agencies are the only eligible entity. MD Labor defines “public sector agencies” as any unit of State, county, municipal, or local government. Entities may already have existing Registered Apprenticeship programs within their agencies. MD Labor encourages collaboration among units of government, such as between county and local governments, when applying to the Fund.

All occupations within an eligible entity may be supported by the Fund, including both contractual and merit/permanent staff positions, as long as MD Labor deems the occupation apprenticeable. MD Labor defines apprenticeable occupations as a job that:

1. Is customarily learned in a practical way through on-the-job training;
2. Can be clearly identified and commonly recognized throughout an industry;
3. Is not a part of an occupation previously recognized by the Council as apprenticeable unless that part is practiced industry wide as an identifiable and distinct trade;
4. Involves manual, mechanical, or technical skills and knowledge, which require a minimum of 2,000 hours of work and on-the-job training, not including the hours spent on related instruction;
5. Requires related instruction supplemental to the on-the-job training which may be given:
  - a. In a classroom,
  - b. Through correspondence courses,
  - c. By self-study, or
  - d. By other means of instruction approved by the Council; and,
6. Involves the development of a skill which is not restricted in application to the products of any one company, but which is broad enough to be applied in similar occupations throughout an industry.<sup>4</sup>

Example occupations include, but are not limited to:

1. Wastewater and Sanitation workers;

---

<sup>3</sup> Support for this project is provided by a grant awarded from the U.S. Department of Labor’s Employment and Training Administration. Overall grant funds total \$6,650,620, of which federal funds comprise 100 percent. It does not include any state general, special, and reimbursable funds.

<sup>4</sup> Code of Maryland Regulations 09.12.43.04, “[Criteria for an Apprenticeable Occupation.](#)”

2. Information Technology Professionals;
3. Health Care workers;
4. Firefighters and Emergency Medical Services personnel;
5. Correctional Officers;
6. Teachers;
7. Budget Analysts;
8. Claims Auditors; and,
9. Skilled tradespeople.<sup>5</sup>

Eligible entities may choose to subaward funding to a non-eligible entity, such as a Joint Apprenticeship and Training Council, Apprenticeship intermediary, or Local Workforce Development Area, to act as the Registered Apprenticeship Sponsor for the pathway. Entities that receive subawards must commit to all aspects of being a Registered Apprenticeship Sponsor in order to be eligible.

## **ALLOWABLE ACTIVITIES**

MD Labor allows the following activities for Public Sector Apprenticeship Innovation Fund grantees:

1. Funding staff needed to develop and administer Registered Apprenticeship programs;
  - a. All applicants applying for funding under this activity will be required to show a sustainability plan for continued funding for the staff upon the conclusion of the grant period;
2. Development of in-house training, curricula, and/or train-the-trainer activities;
3. Reimbursement for the costs of Related Instruction;
  - a. Related Instruction reimbursement is capped at \$3,000 per Apprentice;
4. Reimbursement for staff costs associated with OJL. To be eligible, staff must support the Apprentice with their work on the job site.;
  - a. Must be no more than 50% of an Apprentice’s hourly wages;
5. Supportive Services for Apprentices with barriers to employment;
  - a. Supportive services funding is capped at 20% of the overall grant application. For example, if a prospective applicant’s total application is for \$100,000, supportive services must not exceed \$20,000; and,
6. Other creative activities as approved by MD Labor.

### **Supportive Services**

MD Labor strongly encourages the use of supportive services for participants. Applicants planning to utilize supportive services may submit an application with their own supportive services policy that would be used during the project period. All supportive services spending must be in accordance with Uniform Guidance.<sup>6</sup>

Applicants that do not create their own supportive services policy may use MD Labor’s policy, outlined below. While not all of the below supportive services may be required for the subawardee’s project, they are included here for reference.

---

<sup>5</sup> Additional occupations can be found through USDOL Office of Apprenticeship’s website:

<https://www.apprenticeship.gov/apprenticeship-occupations>.

<sup>6</sup> 2 CFR §§[200](#) and [2900](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

**Assistance Obtaining A Driver’s License** - Subawardees may provide participants assistance with obtaining a driver’s license, except for paying legal fees and/or fines. Examples of assistance may include payment for driver’s education<sup>7</sup> or the cost of getting the driver’s license card.

**Transportation Allowance** - Transportation allowances are available to participants. The transportation allowance must be related to program participation and can cover the cost of traveling to and from training, job interviews, and job fairs, during the first two weeks of starting a new job. Transportation allowances require:

1. Documentation to verify the actual distance traveled and/or a receipt for the cost of the transportation service (e.g. public transit); and,
2. Confirmation of the participant's attendance for the program(s) that required travel.

*Payment Guidelines:* Transportation allowances can be used for public transit users, drivers, and/or rideshare such as Uber, Lyft, or Zipcar.<sup>8</sup> Subawardees must collect and maintain appropriate documentation to verify the participant's covered transportation allowance. For public transit users, Subawardees may cover the expenses for bus, light rail, metro subway, MARC train, Washington Transit, or Commuter Choice Maryland. For drivers, subawardees may approve a travel allowance at a rate not higher than the official Internal Revenue Service (IRS) mileage rate. The maximum allowable payment is \$50 per day, with a maximum cap of \$250 per week. Google Maps or MapQuest must be used to determine daily mileage. Mileage is calculated from the participant’s starting address to the training, interview, job fair, or job site.

**Uniforms, Tools, and Related Equipment** - Subawardees may assist eligible participants with the costs of uniforms, tools, and/or equipment required for participation. Examples of covered items include but are not limited to: steel toe boots and worker tools of the trade.

*Payment Guidelines:* Subawardees must base payments on the curriculum requirements of the program. Payments must be made based on the market value for uniforms, tools, and/or related equipment. Subawardees must collect and maintain appropriate documentation to verify the participant's covered allowance.

**Child or Dependent Care** - When daycare costs for a child or dependent exceed the amount subsidized by the Maryland State Department of Education, subawardees may assist participants with the additional costs. To receive this payment, the dependent needing daycare must be:

1. Under the age of 13;
2. Under the age of 18 and physically or mentally incapable of self-care;
3. A spouse who is physically or mentally incapable of self-care and has the same principal address of the program participant; or,
4. A parent who is physically or mentally incapable of self-care.

*Payment Guidelines:* Subawardees provide this supportive service payment to actively engaged program participants or to those who are in the first two weeks of new employment. Payments must be made based on the average cost of child or dependent care in the jurisdiction for which the participant is accessing care.<sup>9</sup> Payments may cover some, or all of, the costs of care. Subawardees must only approve daycare costs for days that the participant is in training or at work.

---

<sup>7</sup> “Behind-the-Wheel” hours are eligible as long as they are included as part of the driver’s education course.

<sup>8</sup> Other forms of transportation assistance may be funded with MD Labor prior approval.

<sup>9</sup> Local child care rates can be found here: <https://earlychildhood.marylandpublicschools.org/families/child-care-scholarship-program/child-care-scholarship-rates>



To receive child care payments, the participant must complete ALL of the following steps:

1. Apply for a Purchase of Care Subsidy through the Maryland State Department of Education;
2. Provide application results to subawardee's staff;
3. Provide proof that participant has contracted with a State-approved child care provider;
4. Demonstrate evidence of need;<sup>10</sup> and,
5. Document relationship to person in care.

To receive dependent care payments, the participant must complete ALL of the following steps:

1. Provide legal proof of adult dependent's condition that causes the need for care;
2. Provide proof that participant has contracted with a State-approved daycare provider;
3. Demonstrate evidence of need; and,
4. Document relationship to person in care.

**Union Initiation Fees** – Subawardees may assist participants with union initiation fees,<sup>11</sup> which are the costs associated with joining a union, to obtain employment.

*Payment Guidelines:* Subawardees should make payments based on the costs of union initiation fees. The maximum allowable payment is \$200. Subawardees must collect and maintain appropriate documentation (receipts or invoices) to verify the participant's covered union fee allowance.

**Clothing for Interviewing and Job Fairs** - Subawardees may assist participants with the costs associated with clothing for job interviews and/or job fairs. Examples of items that this supportive service covers include: dress shirts, ties, business suits or suit coats, dresses, khaki pants, or dress shoes. Subawardees must collect and maintain appropriate documentation (receipts or invoices) to verify the participant's covered clothing allowance.

*Payment Guidelines:* Subawardees should base the supportive service payment on documentation of an upcoming interview or job fair. The payment must be made on the market value of the item. The maximum allowable payment is \$100 per participant.

**Other Supportive Services** - Other supportive services may be funded with MD Labor approval. If a subawardee has a substantiated reason to believe that a supportive service payment, outside of what has already been identified in this policy issuance, would be appropriate and necessary to a program participant's successful completion, then the subawardee has the option to notify MD Labor and provide a written proposal to justify the prospective supportive service. MD Labor staff will review the proposal and determine whether the cost is appropriate for inclusion as a supportive service.

*Payment Guidelines:* Subawardees must follow the payment guidelines identified by the grantee in their MD Labor-approved proposal.<sup>12</sup>

## PROJECT REQUIREMENTS

Subawardees creating new or expanding existing Registered Apprenticeship programs must:

---

<sup>10</sup> Need is demonstrated if after all other funding sources are applied the cost of care is not covered.

<sup>11</sup> Union initiation fees are different than regular, recurring union fees.

<sup>12</sup> Supportive Services must fall within definition under 20 CFR 651, "[General Provisions Governing the Wagner-Peyser Act Employment Service](#)"

1. Develop Standards of Apprenticeship for a new Apprenticeship program, consistent with the requirements of COMAR 09.12.43.05;<sup>13</sup>
2. Work in partnership with any and all relevant unions in the development of the program, consistent with the requirements of COMAR 09.12.43.03;<sup>14</sup> and,
3. Have the program approved by the Maryland Apprenticeship and Training Council.

Subawardees expanding existing programs, as well as new programs that have been approved by the Maryland Apprenticeship and Training Council, must:

1. Register new Apprentices into the program to include:
  - a. Submit registrations to the MD Labor;
  - b. Complete the online Registered Apprenticeship Partners Information management Data System (RAPIDS) registration form;<sup>15</sup>
  - c. Complete, or have the Apprentice complete, the application for the Maryland Workforce Exchange (MWE);<sup>16</sup> and,
2. Monitor Apprentices throughout their Apprenticeship and submit required documentation to cancel or graduate Apprentices, as applicable.

## **PROHIBITED COSTS**

MD Labor prohibits the use of funds for Apprentice wages, wage subsidies, and/or benefits while in training. For Related Instruction reimbursement, all courses/classes must be a part of the Registered Apprenticeship's approved program of Related Instruction to be eligible. Funds cannot be utilized for continuing education to maintain current certifications unless required in the Registered Apprenticeship Sponsor's Related Instruction, an occupation skill certification is obtained, or it results in a salary increase for the Registered Apprentice.

---

<sup>13</sup> COMAR 09.12.43.05, "[Standards of an Apprenticeship Program](#)."

<sup>14</sup> COMAR 09.12.43.03, "[Eligibility and Procedure for Registration](#)."

<sup>15</sup> More information on RAPIDS registration can be found in the "Reporting" section below.

<sup>16</sup> More information on MWE enrollment can be found in the "Reporting" section below.

# APPLY TO THE PUBLIC SECTOR APPRENTICESHIP INNOVATION FUND

The Public Sector Apprenticeship Innovation Fund is a rolling, competitive grant opportunity that is available until all funds are obligated. Eligible entities are allowed to submit multiple grant applications, however, each application must support either the creation of a new Registered Apprenticeship program or the expansion of an existing program which leads to the registration of new Registered Apprentices. For example, an agency could apply to create a new pathway for Information Technology Professionals, as well as submit a separate application to expand an existing Budget Analyst Apprenticeship program. MD Labor will award a maximum of \$600,000 per eligible entity.

To apply for the fund, eligible entities must submit the application provided in the Public Sector Apprenticeship Innovation Fund Competitive Grant Proposal, provided separately from this policy issuance. Eligible entities interested in receiving the proposal should contact [dlmatapprenticeshipandtraining-labor@maryland.gov](mailto:dlmatapprenticeshipandtraining-labor@maryland.gov) and/or monitor the Maryland Apprenticeship and Training Program's webpage for posted grant opportunities: <https://www.labor.maryland.gov/employment/appr/apprgrants.shtml>. Once posted, applicants must submit completed applications electronically to [dlmatapprenticeshipandtraining-labor@maryland.gov](mailto:dlmatapprenticeshipandtraining-labor@maryland.gov).

Prior to applying to the Public Sector Apprenticeship Innovation Fund, MD Labor requires all applicants to work with an Apprenticeship Navigator<sup>17</sup> to ensure their proposed project/occupation is eligible under the Fund. Additionally, applicants from State agencies must work with Maryland's Department of Budget and Management to ensure that the pathways developed meet all classification and statutory requirements. More details can be found in *Attachment A – Apprenticeship Program Development Process for MD State Agencies*.

## APPLICATION REVIEW

The Public Sector Apprenticeship Innovation Fund Review Team must review applications in a timely manner and ensure that approved applications meet program requirements. Additionally, the review team will seek to fund a diverse set of proposals, both geographically and based upon the organization's number of employees.

Preference will be given to the following types of applications:

1. Proposals that include Group<sup>18</sup> Joint<sup>19</sup> programs; and,
2. Proposals that include STA.

To ensure compliance with the Public Ethics law, MD Code Ann. Gen'l Provisions, Title 5, all staff who participate in discretionary grant reviews are required to complete the DWDAL Reviewer Confidentiality and Conflict of Interest Form. Should a conflict of interest exist, staff must recuse themselves from application review and if staff becomes aware that a conflict may exist during the process, that person must immediately notify the DWDAL Assistant Secretary.

---

<sup>17</sup> All MD Labor Apprenticeship Navigators and their contact information can be found here:

<https://www.labor.maryland.gov/employment/appr/apprnavigators.shtml>

<sup>18</sup> Group programs must include at least two or more employers

<sup>19</sup> Joint programs are programs created jointly between the employer and relevant collective bargaining agent or agents

## APPLICATION APPROVAL/DENIAL

MD Labor must inform applicants via email of approvals or denials at the conclusion of the internal review process. If approved, the MD Labor Office of Workforce Development shall provide the applicant with a Grant Award Notification to be signed by the applicant. After an award agreement has been formally executed, MD Labor shall provide funds to the approved program on a cost reimbursement basis. The awardee will invoice MD Labor via the monthly fiscal report and invoice.

If the review team denies an application, the MD Labor Office of Workforce Development shall provide the applicant with a Grant Denial Notification containing feedback on the application. A denied applicant may re-submit an application for consideration as funding allows. Additionally, they may request reconsideration of the decision. The appeal must be either emailed to [dmatpapprenticeshipandtraining-labor@maryland.gov](mailto:dmatpapprenticeshipandtraining-labor@maryland.gov) within 14 calendar days of the date of the Grant Denial Notification and (1) state the grounds for the request; and, (2) state the reasons why the application should be reconsidered and approved. The DWDAL Assistant Secretary (or designee) will consider all requests for reconsideration and provide a written response to the applicant within 30 calendar days of request receipt. The DWDAL Assistant Secretary (or designee)'s decision is final.<sup>20</sup>

In order to receive a grant award, potential subgrantees must obtain a Unique Entity Identifier (UEI) pursuant to the Uniform Guidance, 2 CFR 23.100. No subaward may be made unless the entity has provided its UEI to the awarding agency. UEI numbers are obtained through registration in [www.sam.gov](http://www.sam.gov).

---

<sup>20</sup> Any of the time periods under this section, "Application Approval/Denial," may be extended by the MD Labor DWDAL Assistant Secretary at their sole discretion.

# REPORTING, MONITORING, AND RECORD RETENTION

## REPORTING

MD Labor requires Public Sector Apprenticeship Fund grantees to submit monthly program and fiscal reports. Reports are due on the 10<sup>th</sup> of the month following reported activity. All reports should be sent via email to Wayne Salter at [wayne.salter@maryland.gov](mailto:wayne.salter@maryland.gov), Alex Sackey-Ansah at [alex.sackey-ansahl@maryland.gov](mailto:alex.sackey-ansahl@maryland.gov) and Todd O’Banner at [todd.obanner1@maryland.gov](mailto:todd.obanner1@maryland.gov). Funds will be disbursed on a reimbursement basis based on the amount included on the monthly invoice. The invoice must match the net amount on the monthly fiscal report in order to be processed. Examples of the reports can be found in *Attachment B – Sample Monthly Program Report* and *Attachment C – Sample Monthly Fiscal Report and Invoice*.

Additionally, MD Labor requires subawardees to direct all participants to self-enroll into the MWE in a timely manner. If participants do not self-enroll, subawardees must enroll the participant into the MWE. Subawardees are responsible for tracking outcomes and collecting source documents to validate data on all participants served, including:

1. All services provided;
2. Completion of services;
3. Job placement, job retention, and earnings; and,
4. Participant Identification Verification Elements used (MD Driver's License/Passport, or Birth Certificate/Social Security Number/I-9/Date of Birth/Residence Address, etc.)

Subawardees must also collect the following participant demographic information:

1. Age;
2. Race;
3. Gender;
4. Education Level;
5. Driver's License; and,
6. Veteran Status.

Lastly, subawardees must register within the USDOL RAPIDS database. Upon registration, each subawardee will be given a unique account and user ID to enter data into the system.

MD Labor will provide technical guidance to subawardees related to data collection, required supporting documentation, and reporting during the term of the grant. If any subawardee experiences difficulty with data reporting they should contact MD Labor Grant Manager Wayne Salter at [wayne.salter@maryland.gov](mailto:wayne.salter@maryland.gov). For issues when enrolling in the MWE, subawardees and/or participants should contact the MWE Help Desk at [WeHelp@dllr.state.md.us](mailto:WeHelp@dllr.state.md.us) or 410-767-2100 for support.

## MONITORING

The State acknowledges that USDOL may conduct fiscal and/or programmatic monitoring of the State Apprenticeship Expansion Grant. Therefore, MD Labor may conduct annual fiscal and programmatic monitoring of the project to ensure that grantees are following policies and meeting expectations, including nondiscrimination and equal opportunity provisions. Monitoring may include desk and/or on-site monitoring. Failure of MD Labor

to supervise, evaluate, or to provide guidance and direction shall not relieve the grantee of any liability to comply with the terms of the grant or award agreement.<sup>21</sup>

## **RECORD RETENTION**

In accordance with the Standards of Apprenticeship, Maryland requires participating Registered Apprenticeship Sponsors to maintain records for at least five years of all persons applying for the Apprenticeship program indicating whether or not the applicant:

1. Completed the application process;
2. Met the Apprenticeship program qualifications;
3. Was placed on the eligibility list; and,
4. Was registered.

All records, both electronic and physical, must be maintained in accordance with TEGL 39-11, “Guidance on the Handling and Protection of Personally Identifiable Information (PII),” as well as DWDAL’s policy concerning privacy and data security. PII is participant-level and employee data that either by itself or combined with other data can link to a specific individual or identity.

When emailing documents containing PII, all awardees and MD Labor staff must use password-protection, encryption-preferred, strong authentication procedures, or other security controls to make the information unusable by unauthorized individuals. Physical records must be kept in locked offices or file rooms. If the file room is shared with other programs, and/or staff other than staff authorized for this program have access to that room, then the files must be maintained in locked cabinets.

---

<sup>21</sup> DWDAL’s Policy Issuance on monitoring can be found here: <http://www.labor.maryland.gov/employment/mpi/>.

## FAIR PRACTICES AND ACCESSIBILITY

It is MD Labor's policy that all persons have equal opportunity and access to services and facilities without regard to race, religion, color, sex (including pregnancy, childbirth and related medical conditions, transgender status, gender identity), marital status, genetic information, age, national origin or ancestry (including Limited English Proficiency), disability, veteran status or political affiliation or belief. Subawardees working with participants in need of accommodations are responsible for securing the necessary support. Additionally, subawardees must comply with 29 CFR 30,<sup>22</sup> COMAR 19.12.42, and the Registered Apprenticeship Sponsors Equal Employment Opportunity plan. Subawardees may refer to MD Labor's Nondiscrimination Plan<sup>23</sup> and Language Access Plan<sup>24</sup> for more information on accommodations and services.

---

<sup>22</sup> <https://www.ecfr.gov/current/title-29/subtitle-A/part-30>

<sup>23</sup> MD Labor's Nondiscrimination Plan is available at the following link:  
<http://www.labor.maryland.gov/employment/ndp/>.

<sup>24</sup> The DWDAL and Division of Unemployment Insurance Language Access Plan is available at the following link:  
<http://www.labor.maryland.gov/employment/wioa-access.pdf>.

# REFERENCES

## LAW

- [Workforce Innovation and Opportunity Act](#) (WIOA), 29 U.S.C. § 3101 et. seq (2015);
- [National Apprenticeship Act of 1937](#), 29 U.S.C. § 50;
- MD Code Ann., Educ. § 18-1802 "[Youth Apprenticeship Program](#);" and,
- MD Code Ann., Labor & Emp. § 11-401 et seq. "[Planned Apprenticeship Standards and Activities](#)."

## REGULATION

- 2 CFR §§[200](#) and [2900](#) – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards;
- 20 CFR 651, "[General Provisions Governing the Wagner-Peyser Act Employment Service](#)"
- 29 CFR § 29-30, "[Apprenticeship Programs; Equal Employment Opportunity](#);"
- 29 CFR § 97.42, "[Retention and Access Requirements for Records](#);"
- COMAR 09.12.42, "[Equal Employment Opportunity](#);" and,
- COMAR 09.12.43, "[Maryland Apprenticeship and Training](#)."

## USDOL GUIDANCE

- TEGL 23-19, Change 2, "[Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#)," dated May 12, 2023;
- TEGL 23-19, Change 1, "[Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#)," dated October 25, 2022;
- TEGL 23-19 "[Guidance for Validating Required Performance Data Submitted by Grant Recipients of U.S. Department of Labor \(DOL\) Workforce Programs](#)," dated June 18, 2020;
- Training and Employment Guidance Letter (TEGL) 15-19, "[Availability of Program Year 19 Funding for State Apprenticeship Expansion, Building State Capacity to Expand Apprenticeship through Innovation](#)," dated April 14, 2020;
- TEGL 17-18, Change 2, "[Change 2 to Training and Employment Guidance Letter \(TEGL\) 17-18, Availability of Program Year \(PY\) 18 Funding for State Apprenticeship Expansion](#)," dated October 10, 2019;
- TEGL 17-18, Change 1, "[Change 1 to TEGL 17-18: Availability of Program Year 18 Funding for State Apprenticeship Expansion](#)," dated May 21, 2019;
- TEGL 17-18, "[Availability of Program Year 18 Funding for State Apprenticeship Expansion](#)," dated May 3, 2019;
- TEGL 7-18, "[Guidance for Validating Jointly Required Performance Data Submitted under the Workforce Innovation and Opportunity Act \(WIOA\)](#)," dated December 19, 2018;
- TEGL 13-16, "[Guidance on Registered Apprenticeship Provisions and Opportunities in the Workforce Innovation and Opportunity Act \(WIOA\)](#)," dated January 12, 2017;
- Training and Employment Notice (TEN) 31-16, "[Framework on Registered Apprenticeship for High School Students](#)," dated January 17, 2017;
- TEN 44-11, "[Encouraging Enhanced Partnerships and Collaboration between the Workforce Investment System and Registered Apprenticeship Programs](#)," dated May 10, 2012;
- TEGL 39-11, "[Guidance on the Handling and Protection of Personally Identifiable Information \(PII\)](#)," dated June 28, 2012;
- TEN 48-08, "[Release and Availability of Report Titled, The Benefits and Challenges of Registered](#)



- [Apprenticeship: The Sponsors' Perspective](#),” dated June 1, 2009; and
- TEGL 02-07, “[Leveraging Registered Apprenticeship as a Workforce Development Strategy for the Workforce Investment System](#),” dated July 12, 2007.

## OTHER RESOURCES

- American Institute for Innovative Apprenticeship, “[National Occupational Frameworks](#);”
- American Institute for Innovative Apprenticeship, “[Starting a Registered Apprenticeship Program: A Guide for Employers or Sponsors](#),” dated June 2017;
- [DWDAL Policy Issuance Page](#); and,
- [Maryland WIOA Combined State Plan](#).

## **ATTACHMENTS**

- Attachment A – Apprenticeship Program Development Process for MD State Agencies
- Attachment B - Sample Monthly Program Report
- Attachment C - Sample Monthly Fiscal Report and Invoice

# Apprenticeship Program Development Process for MD State Agencies

---

Please review and follow the guidance provided in the Apprenticeship Program Development Best Practices document first, then proceed to follow the process below.

## Process for State Agencies

1. Receive approval from the agency Appointing Authority to pursue an apprenticeship training program.
2. Identify potential classifications for apprenticeship, complete an Apprenticeship Program Proposal Form for each classification, and compile relevant information listed on the form, including the:
  1. number of vacancies in the class(es) versus filled positions;
  2. number of available trainers/mentors/journeyworkers in advanced levels of the class(es);
  3. current position descriptions and requirements; and
  4. rough outline of apprenticeship proposal, addressing the required components as detailed in the Apprenticeship Program Proposal Form (e.g. OJT, education/related instruction, progressive wage increase schedule).
3. Submit the form and information from step 2 to [State.Apprenticeship@maryland.gov](mailto:State.Apprenticeship@maryland.gov) to request an initial meeting with Department of Budget and Management (DBM) to review the proposal outline, discuss any statute related to the class(es), required education/credential/certification, etc.
4. After the initial meeting between DBM and the agency, DBM will connect the agency to the appropriate MD Labor Apprenticeship Navigator to schedule a meeting between MD Labor and any required partners that were identified (e.g. board representation, DBM Classification and Salary Division, union/collective bargaining representative). The group will collaborate and narrow down the specific components of the apprenticeship pathway, then draft the apprenticeship program standards.
5. Once the required partners in step 4 have outlined well-developed program standards, the agency will submit them to [State.Apprenticeship@maryland.gov](mailto:State.Apprenticeship@maryland.gov) to schedule a follow up meeting with DBM to:
  1. review the apprenticeship program(s) proposal;
  2. verify union participation in the program development; and
  3. address any final questions and concerns.
6. At this point in the process, the agency may submit the apprenticeship standards with its application for grant funds to MD Labor.
7. The agency, DBM, and union representative will need to formally negotiate and agree to the apprenticeship program, consistent with the requirements of COMAR 09.12.43.03<sup>1</sup>.
8. After DBM and required representatives have finished negotiating the apprenticeship program standards, the agency may submit the final draft of apprenticeship program standards to MD Labor. An Apprenticeship Navigator will then present the apprenticeship program to the Maryland Apprenticeship and Training Council (MATC) for registration at the next MATC meeting<sup>2</sup>.

---

<sup>1</sup> COMAR 09.12.43.03 "[Eligibility and Procedure for Registration](#)"

<sup>2</sup> Apprenticeship program proposals should be submitted to Labor a minimum of 6 weeks prior to the [MATC meeting](#).

# Public Sector Apprenticeship Innovation Fund

## Monthly Program Report Form

---

Grantees of the Public Sector Apprenticeship Innovation Fund must submit monthly program reports to the Maryland Department of Labor. Please complete all fields of this document and submit it with all other required documents no later than **11:59PM on the 10th day following the end of the month of reported activity**. Prior to submission, review the items listed below that are required for monthly reporting and all instructions in this document to ensure a complete and accurate submission.

Failure to submit timely and accurate Monthly Reports can result in delayed reimbursements and potential disqualification from future grant funding.

### Public Sector Apprenticeship Innovation Fund Monthly Report Checklist

REQUIRED DOCUMENTS	OPTIONAL DOCUMENTS
<ul style="list-style-type: none"> <li>• <b>Monthly Program Report Form</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Photos, Video, Program Collateral</b></li> </ul>
<ul style="list-style-type: none"> <li>• <b>Monthly Fiscal Report and Invoice (submitted separately)</b></li> </ul>	

### Submission Instructions

Completed reports should be submitted via email to:

Wayne Salter ([wayne.salter@maryland.gov](mailto:wayne.salter@maryland.gov))  
 cc: Dorothee Schlotterbeck ([dorothee.schlotterbeck@maryland.gov](mailto:dorothee.schlotterbeck@maryland.gov)).

Questions can be sent to:

Wayne L. Salter  
 Grants Manager, Apprenticeship and Training  
 1100 N. Eutaw Street, Room 209  
 Baltimore, Maryland 21201  
[Wayne.Salter@maryland.gov](mailto:Wayne.Salter@maryland.gov)  
 443-562-2402 (mobile)

Submissions should include all required documents listed above and should be submitted as a file transfer or as attachments to a single email.

**Public Sector Apprenticeship Innovation Fund**  
Monthly Program Report Form

**SECTION 1: AWARD INFORMATION**

<b>1</b>	<b>Organization Name</b>			
<b>2</b>	<b>Point of Contact Name</b>			
<b>3</b>	<b>Point of Contact Title</b>			
<b>4</b>	<b>Point of Contact Email Address</b>			
<b>5</b>	<b>Point of contact Phone Number</b>			
<b>6</b>	<b>Organization Street Address</b>			
<b>7</b>	<b>Month</b>	<b>8</b>	<b>Fiscal Year</b>	

**SECTION 2: GRANT NARRATIVES**

<b>9</b>	<b>Briefly describe the program and the activities performed over the month.</b>
<b>10</b>	<b>Provide a description of the following items for the program this month:</b> (a) Key activities completed; and (b) Additional activities performed by the grantee, if applicable. (c) List names of apprentices served or attach a separate document with a list.
<b>11</b>	<b>Provide a description of employer outreach activities.</b>
<b>12</b>	<b>Provide a description of participant recruitment and outreach activities, including a description of the activities targeted to individuals with barriers to employment, individuals with disabilities,</b>

<b>12</b>	<b>women, and people of color.</b>
<b>13</b>	<b>Describe any challenges or concerns the project has encountered that may have affected or slowed grant progress of the timeline/work plan and how the project attempted to resolve them. Please include any areas that may require specific technical assistance from Labor staff.</b>
<b>14</b>	<b>Describe the next steps or key areas of emphasis planned for the project in the next month.</b>

**Instructions for Reporting Program Activity**

Grantees must complete Section 3 of this report with programmatic data for both the monthly reporting period and the cumulative year to date.

<b>SECTION 3: PROGRAM ACTIVITY</b>			
<b>15</b>	<b>Complete the chart below to identify the program’s targeted key performance outcomes.</b>	This Month	Year to Date
<b>A</b>	Number of Apprentices enrolled		
<b>B</b>	Number of recruitment activities for employers		
<b>C</b>	Number of recruitment activities for Apprentices		
<b>D</b>	The number of employer agreements completed/submitted		
<b>E</b>	The number of Apprentice agreements completed/submitted		
<b>F</b>	Number of Apprentices who received supportive services		
<b>F</b>	Number of individuals completed the program		

**Instructions for Section 4: Significant Activities, Accomplishments, & Success Stories**

This section is intended to provide more in-depth information than the previous sections about promising

approaches, new processes, major accomplishments, and/or lessons learned from the program. In answering the following questions, subawardees should describe background information on the participant or issue, include an analysis of any interventions used, and use evaluation data where appropriate. Participant-level stories and data may only be reported with the consent of the participant.

**SECTION 4: SIGNIFICANT ACTIVITIES, ACCOMPLISHMENTS, & SUCCESS STORIES**

**16** Describe in detail any promising approaches, innovative processes, lessons learned, or major programmatic milestones.

**17** Describe in detail any participant-level accomplishments or success stories from the month.

*Photos, videos, web content, and other program collateral can be submitted as an attachment with the submission of this report.*

Completed reports should be submitted via email to:

Wayne Salter ([wayne.salter@maryland.gov](mailto:wayne.salter@maryland.gov)),  
cc: Dorothee Schlotterbeck ([dorothee.schlotterbeck@maryland.gov](mailto:dorothee.schlotterbeck@maryland.gov)).

Submissions should include all required documents listed above and should be submitted as a file transfer or as attachments to a single email.

**MONTHLY FINANCIAL REPORT and INVOICE**

**[INSERT GRANT NAME]**

This form must be completed by the **tenth** (10th) day of the month following the end of the quarter by grantees. Signed forms must be scanned and submitted via email to:  
 Maryland Department of Labor, DWDAL Attn: [INSERT NAMES ] 1100 North Eutaw Street, Room 209, Baltimore, MD 21201  
[\[INSERT EMAIL ADDRESS\]](#)  
[\[INSERT EMAIL ADDRESS\]](#)

<b>GRANTEE NAME:</b>	
<b>GRANT NUMBER:</b>	
<b>MONTH ENDING:</b>	
<b>DATE:</b>	

**SECTION A. FINANCIAL REPORT – please complete the blue shaded sections**

**SUMMARY OF EXPENDITURES**

EXPENDITURES	Approved Budget	Prior Month Expenditures (cumulative amount)	Monthly Net (= invoice)	Total Accrued Expenditures (cumulative amount)	Variance (over/under budget)
Staff Salary/Wages				-	-
Staff Fringes				-	-
Contractual				-	-
Travel	-				-
Supplies				-	-
Equipment				-	-
Training				-	-
Other				-	-
Other/Indirect/Admin				-	-
<b>Total Expenditures and Monthly Invoice Amount</b>	-		-	-	-

<b>Unliquidated Obligations</b>	n/a		n/a		n/a
<b>Total Obligation (sum of expenditures and unliquidated obligations)</b>	n/a		n/a	-	n/a

**SUMMARY OF RECEIPTS**

<b>Total Cash Received</b>	n/a		n/a		n/a
<b>Total Cash Disbursements</b>	n/a		n/a		n/a

**CERTIFICATION:** By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate and the expenditures, disbursements and cash receipts are for the purposes and intent set forth in the award document. I am aware that any false, fictitious or fraudulent information may subject me to criminal, civil or administrative penalties. (U.S. Code, Title 18, Section 1001)

**Authorized Signature and Date:**

**Print Name and Title:**

**SECTION B. MONTHLY INVOICE**



**PLEASE ADD COMPANY LETTERHEAD**

DATE:	
GRANTEE:	
MONTH ENDING:	

**INVOICE**

Remit Payment To:			
Company Name:		Award #	
Address:		Award Amount:	
Address:		Invoice No.:	
		Invoice Date:	

Bill To:	
Maryland Department of Labor	
DWDAL Fiscal Administration	
1100 N Eutaw Street, Room 209, Baltimore MD 21201	
Attn: [ INSERT NAME(S) ]	

Description			
Item:		Amount:	
Item:		Amount:	
Item:		Amount:	
Item:		Amount:	
Item:		Amount:	
Item:		Amount:	
Item:		Amount:	
<b>TOTAL INVOICE:</b>			-

Authorized Signature:		Date:	
Printed Name:			