March 14, 2024

U.S. Department of Labor
Employment and Training Administration
200 Constitution Ave NW
Washington, DC 20210

Re: Comments to the National Apprenticeship System Enhancements Noticed of Proposed Rulemaking; RIN 1205–AC13

NAF is pleased to provide comments on the proposed enhancements to the National Apprenticeship System that aim to meet the current workforce needs and modernize the System.

NAF is a national nonprofit organization that aims to address economic and social disparities by bringing schools and businesses together to better prepare students of all backgrounds and capabilities for college, career, and future success. For over 40 years, NAF has partnered with high schools in historically under-resourced communities to enhance school systems by implementing NAF academies – small, focused learning communities within traditional public high schools themed around growing industries, including engineering, finance, health sciences, information technology, and hospitality and tourism. NAF annually supports over 113,000 students in over 150 school districts across 34 states and territories.

Academies in the NAF network connect the classroom to the workplace by integrating career-focused curricula and hands-on, industry-guided learning projects into the traditional high school experience. With a rigorous program of study and a progressive continuum of work-based learning activities designed to build career awareness, exploration, and preparation, students gain the skills and knowledge necessary to make informed choices and be successful in their future careers. NAF’s design works to ensure all students are aware of college and career pathways throughout their high school experience, including opportunities for youth apprenticeships, pre-apprenticeships and apprenticeships. This design provides a unique perspective on the best practices for engaging youth early on in career exploration, ensuring students are setting themselves up for an apprenticeship experience or similarly rigorous post-secondary or employment experience and are committed to complete that experience.

Recognizing the National Apprenticeship System needs to be modernized and strengthened to better meet the current workforce demand is a welcomed goal from the Department. While NAF applauds this proposed rulemaking, we encourage the Department to ensure all high school students have access to the full continuum of work-based learning opportunities (job shadows, internships, work
site visits etc.) and career exposure experiences. Such experiences provide the future ready skills students need to succeed in their future no matter what career or postsecondary pathway they follow. Apprenticeship programs are designed around a very specific employer, requiring that employer to invest additional resources and often engage external stakeholders to fully develop the program to meet necessary requirements. In many cases, this investment of time and resources is met with low participation and completion rates. In comparison, work-based learning opportunities can engage multiple industries and employers and provide varying levels of involvement from these companies while still providing unique and meaningful experiences to students. Given that today’s workforce will change employers, and even change industries, multiple times throughout their career, the broader focus on the future ready skills early on is why NAF believes work-based learning opportunities have a broader, and more equitable, reach. NAF encourages the Department to continue to support and strengthen work-based learning opportunities that are in line with current opportunities through the Workforce Innovation and Opportunity ACT (WIOA) and Perkins funding to leverage existing resources and to further incentivize businesses to provide work-based learning opportunities to all high school students.

NAF appreciates the focus and attention on preparing students to be college and career ready and is ready to assist the Department in any way we can. Thank you for the opportunity to provide comments.