



Date: January 26, 2015

Attn: Michael Qualter
Chief, Division of Program Administration and Management Services
Office of Apprenticeship
Room N-5311
Employment and Training Administration, U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210
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Re: Public Comments on Collection for Labor Standards for the Registration of Apprenticeship Programs, Extension with Minor Definition Addition

Submitted by: The Local Initiatives Support Corporation (LISC)

Thank you for the opportunity to offer comments on the Collection for Labor Standards for the Registration of Apprenticeship Programs, Extension with Minor Definition Addition. The Local Initiatives Support Corporation (LISC) supports the Department of Labor's proposal to modify the current apprentice registration form to capture data about pre-apprenticeship as an entry pathway to registered apprenticeship.

If you have any questions about our public comments, please contact Seung Kim, Program Director for Family Income & Wealth Building at (312-422-9579) or skim@lisc.org.

ABOUT LISC

Established in 1979, LISC is one of the nation's largest nonprofit community development support organizations, dedicated to helping community residents transform distressed neighborhoods into healthy places of choice and opportunity. With local offices in 30 cities and partners throughout Rural America, LISC mobilizes corporate, government and philanthropic support to provide local community development organizations with loans, grants and equity investments; local, statewide and national policy support; and technical and management assistance.

LISC's leadership in supporting innovative, evidence-based economic opportunity programs nationwide has been recognized by a diverse array of foundation, corporate, and federal-agency funders. In 2010, LISC was one of the inaugural recipients of a federal Social Innovation Fund intermediary grant to support the expansion and strengthening of our Financial Opportunity Center (FOC) model, which provides integrated employment services, financial coaching, and income supports access to low- and moderate-income neighborhood residents through accessible, trusted, and culturally competent community-based organizations.

Ten years after piloting the model in Chicago, LISC's network of FOCs now comprises over 75 Centers in 33 cities across the country. These organizations provide a wide range of workforce development services, including job readiness, pre-apprenticeship or "bridge" programming, technical skills training, and ongoing employment coaching to facilitate success on the job and career advancement. LISC's FOC network partners blend funding from LISC and locally-raised sources, with many also receiving Workforce Investment Act funds through federal competitive grants or connections with their state or local workforce agency.

As part of this work, LISC has embarked on an initiative to support and strengthen pre-apprenticeship and "bridge" programming within its Financial Opportunity Center network. Across the 75 Centers, employment coaches report that too many families in their communities are financially struggling, yet have difficulty accessing community colleges, apprenticeships and other "middle-skills" job training outlets due to academic readiness barriers and logistical barriers like access to high quality child care and transportation. Our partners' pre-apprenticeship and bridge programs are designed to provide industry-contextualized foundational instruction in areas including reading, math, computer skills, and English proficiency, so that neighborhood residents can qualify for and succeed in training that will ultimately lead to industry-recognized credentials, a career pathway, and family-supporting employment.

COMMENTS

We offer our support for the proposed modification, based upon LISC's 10-plus years of supporting community-based workforce development and financial opportunity initiatives.

In addition to academic readiness barriers, individuals in the communities where LISC works often lack information about where to find basic education and pre-apprenticeship programs. Unfortunately, many fall victim to the marketing claims of unscrupulous training providers offering financially-burdensome programs that appear attractive but turn out not to confer credentials, skills, or knowledge that are valued by employers.

For this reason, pre-apprenticeship is an especially critical strategy for helping underserved neighborhood residents prepare for and connect to high-quality skills training pathways like community college and registered apprenticeship. Accordingly, it will be beneficial for the workforce development field to gain a better understanding, through data collection, of the extent to which pre-apprenticeship programs are serving as an entry point for registered apprenticeship.

Thank you again for the opportunity to provide comment. LISC looks forward to continuing to contribute to the Department's mission of strengthening pre-apprenticeship and registered apprenticeship programs.