

To: Nevada State Apprenticeship Council
From: Erin Hasty, State Apprenticeship Director and Manny Lamarre, Executive Director, OWINN
Date: February 14, 2019
Re: Review of Programs – State Director Recommendation for Program Sponsor Review

In accordance with NAC 610.935, the Nevada State Apprenticeship Council (“Council”) is responsible for conducting a systematic review of the apprenticeship programs on a regular basis. This audit is to ensure that program sponsors are complying with statutes associated with program requirements.

The Office of Workforce Innovation (“OWINN”) serves as the Registration Agency (“RA”) for Apprenticeship Program Sponsors. At the direction of the Council last fall, OWINN reached out to all existing program sponsors with a brief pre-audit worksheet/questionnaire.

Based on direction from the Council, program sponsors were divided into three categories:

1. Programs with no record of compliance review who had active apprentices (given a correspondence deadline);
2. Programs who had no record of an active apprentice in two years or more (given a correspondence deadline); and
3. Programs who had a record of review (were requested to verify information).

Another ancillary benefit to this program sponsor correspondence was that the RA was able to:

- Validate and/or correct apprentice information data found in RAPIDS (validate current contact information, overdue apprentice completion date justification, validate current registered apprentices, etc.) and
- Check status of EEO goals and attainment status.

After sending out the correspondence to the program sponsors (note some programs received multiple notices):

- 21 notices were sent to programs who had no record of having an apprentice in two (2) years or more¹:
 - 62% (13) have not responded to the RA notice
 - 20% (4) requested their programs be deregistered by the RA
 - 9% (2) confirmed they did not have apprentices in the two (2) years but desired to keep the program active (one not registered since 2010 and one since 2008)
 - 9% (2) have registered apprentices since the RA dialogue was started with the program sponsor
- 33 notices were sent to programs with requests by the RA to update program information and to verify other miscellaneous information²
 - 39% (13) responded and completed RA request

¹ See RA Recommendation

² See RA Recommendation

- The RA records indicated that 40 programs had no record of review. After correspondence with all programs,
 - 30% (12) said they have reviews and are providing the RA documents to support the review date and findings
 - 65% (26) no record of being reviewed but active apprentices; and
 - 5% (2) programs have not responded.
- 4 programs were considered “on probation” and are required to be reviewed within two years of program start date:
 - 3 programs were approved in 2018 and are scheduled to be reviewed in 2020
 - 1 program was approved in 2017 and is scheduled in 2019 to be reviewed.

While the memo discusses program reviews, it is also important to note that the RA has had conversations throughout the year regarding written program standards. To ensure all programs are still operating to NRS and NAC standards, the Council must review program standards at least every five (5) years.

A review of program sponsors and their standards found:

- 40 total programs had no standards update in five years or more
 - 26 of those who had no program review recorded have standards older than five years or more
 - 13 programs have not updated in 10 years or more
 - 3 programs have not updated in 20 years or more
 - 13 with program reviews have recorded five years or more without updating program standards
 - 4 programs with a review have not updated in 10 years or more
 - One program has no standards filed, need records
- Of all programs, 486 apprentices are past expected completion dates.

RA Recommendations

- 1) Deregister programs who have requested to be voluntarily deregistered**
- 2) Send notices to the programs who have not registered an apprentice in two years or more stating their program will be deregistered June 1, 2019 unless the request to make request to appear at a regularly scheduled Council meeting to receive exception to the registered apprentice in two (2) years**
 - a. RA will then agendize the requests for exception at quarterly Council meetings**
 - b. Should a program fail to maintain communication with the RA, then the RA will be authorized to send “Intent to Cancel Program” letter to the program sponsor.**
- 3) RA to work directly with program sponsors (regardless of having received review or not) to assist them with updating their program standards.**

- a. **Program standards that have not been reviewed in ten years or more shall be contacted first and required to update standards or consider deregistration followed by program who have not updated their standards in less than 10 years**

Following this RA review, the updated standards will be agendized during the regular Council quarterly meetings. Should a program fail to maintain communication with the RA, then the RA will be authorized to send "Intent to Cancel Program" letter to the program sponsor.

- 4) **RA to prioritize in-person site visit to the programs:**
 - a. **Who have no record of review and those with the longest time since updating standards and reporting its progress at each quarterly Council meeting (priority would be the 16 programs with no record of review and standards that have not been updated in 10 years or more)**
 - i. **RA to begin with the three (3) programs with 20 years or more since updating their standards and then moving to the 13 programs with 10 years or more since updating their standards and then lastly moving to the programs with less than 10 years since updating their standards;**
 - b. **Programs who had findings during the review process but records do not indicate a re-review or follow up;**
 - c. **Schedule 2019 and 2020 initial program review for programs that were approved in 2017 and 2018.**

Should a program fail to maintain communication with the RA, then the RA will be authorized to send "Intent to Cancel Program" letter to the program sponsor.

- 5) **RA to make quarterly updates to the Council regarding record of review and programs that have failed to comply with requests for information and have been provided intent to cancel notification.**