

Written Councilmember Comments

Submitted to BAS email address (apprenticeship@dwd.wisconsin.gov) prior to May 24

- **Page 25, first sentence, first paragraph:** *“Apprentices may be eligible for credit for both prior work experience and related instruction. Apprenticeship contracts, in the Exhibit A, must contain a statement of any advanced standing awarded to the apprentice.”^[1]*
 - This seems to imply that the award of advanced standing must be known at the inception of and contained in the original apprentice contract. I don’t believe this is correctly stated. The subsequent “Work Credit” section allows for a longer timeframe: *“Credit should be granted prior to the end of the probationary period, or at least as soon as a proper evaluation can be made of the credit request.”* The subsequent Paid Related Instruction Credit section does not reference any time limit at all. From the POV of the new aligned apprenticeship programs being developed, there are multiple instances where the awarding of CPL for some RI courses is intentionally designed to occur toward the end of the related instruction provision i.e. awarding could occur even in the second or third year of the term of the apprenticeship. This is desirable to maintain flexibility about when CPL may be awarded for RI credit.
- **Page 26, Related Instruction Providers section, #1, second sentence:** Remove “According to state law” since it is redundant to the statutory footnote already cited for this sentence.
- **Page 26, Related Instruction Providers section, #1, last sentence:** *“Non-apprentices are prohibited from enrolling in apprentice technical instruction courses ~~using the~~ designated as WTCS Aid Code 50.”*
- **Page 27, WTCS Instructors section, last sentence:** The correct citation is WI Admin Code TCS 3.03-3.05, inclusive, that define all the WTCS instructor requirements, not just the occupational and teaching experience requirements cited under TCS 3.04 alone.
- **Page 27, Independent Instructors section, Teaching Techniques sub-section, last sentence:** *“If the instructor does not have training in teaching techniques and adult learning styles ~~before the instructor has started~~ prior to beginning to teach apprentices, ~~these required classes must occur~~ the instructor must complete these required courses within two years of the onset of those initial classes initial date of teaching assignment.”*

^[1] § DWD 295.07(3)(L)