

Written Testimony of Joshua J. Laney, Ed.S., Vice President of Apprenticeship and Work-Embedded Learning for the Competency-Based Education Network to the Senate Health, Education, Labor & Pensions Committee

Hearing Topic: Registered Apprenticeship: Scaling the Workforce for the Future

Date and Time: Nov. 5, 2025, 10 a.m. ([link to hearing](#))

Opening

Chair Cassidy, Ranking Member Sanders, and members of the Committee, thank you for the opportunity to appear today. It is a privilege to provide testimony on behalf of the Competency-Based Education Network and to share insights from my experience leading apprenticeship expansion at the state and national level.

Biography and Background

Good morning. My name is Josh Laney. I am a fourth-generation Alabama cattle farmer from a family of public school educators. Until recently, I served for six years as the inaugural Director of the Alabama Office of Apprenticeship under Governor Kay Ivey. During that time, Alabama became a leader in meaningfully connecting apprenticeship with higher education, not to replace the long-standing strength of apprenticeship in the skilled trades, but to expand its benefits into fields where it had rarely existed before. We demonstrated that apprenticeship is not limited to traditional fields. It can also scale into high-demand professions like healthcare, education, and technology.

A soon-to-be-released report from New America finds that Alabama now has more degree-bearing apprenticeships than any other state. This growth did not occur by simply labeling an existing degree an apprenticeship. Pulling a degree from the catalog and calling it an apprenticeship does not change the learner experience or meet employer expectations. Institutions must rethink scheduling, support services, and how learning is offered and measured. When colleges treat apprentices as employees who come to them for professional development, instead of students seeking occasional work experience, meaningful transformation occurs. Today, I am blessed to bring my focus and passion for apprenticeship to my new role as vice-president of apprenticeship and work-embedded learning at the Competency-Based Education Network (C-BEN).

My introduction to C-BEN's philosophy was somewhat accidental. In 2023, I attended the CBExchange conference on the east coast, stepping in for my friend and colleague Nick Moore, who had commitments with Governor Ivey. I spoke about Alabama's collaboration with C-BEN on our Five-Part Test for in-demand occupations and our work on the Alabama Talent Triad. I stayed and listened as university leaders and accreditors discussed measuring learning through

demonstrated competency rather than time. It took nearly two days before I realized they were not talking about apprenticeship. They were describing a new way of doing higher education that aligns almost perfectly with the principles of apprenticeship. Like the old Reese's commercial, they had chocolate in my peanut butter, and I had peanut butter in their chocolate.

For more than a decade, C-BEN has led a national movement to transform education through competency-based learning. Our mission is to center learning on what people know and can do, connect education meaningfully to workforce needs, and ensure that systems work for both learners and employers. We help institutions and states shift from time-based models to ones grounded in mastery and real capability. C-BEN has over 5,000 members. Accreditors, specifically specialized accreditors, are embracing Competency-Based Education (CBE). For example, the American Association of Colleges of Nursing has instructed their members to move to CBE and to fully implement THE ESSENTIALS, a set of competencies for bachelor's through doctoral level programs. Competency-based medical education, competency-based theological education, and many other fields are moving this direction. Increasingly, apprenticeship plays a key role in this vision.

Much like the AOA doesn't do apprenticeship the way it has always been done, C-BEN doesn't do education the way it has always been done. It is exactly this reframing of both the methods and measures of learning that must drive any successful effort to scale the workforce of the future. Apprenticeship and higher education both face criticism when they rely on rigid structures or one-size-fits-all approaches. Cookie-cutter degrees do not serve students, and cookie-cutter apprenticeships do not serve employers.

If we are serious about reaching the national goal of one million apprentices, we cannot simply ask existing employers to take on thirty percent more apprentices. Based on a non-scientific survey of state apprenticeship directors, there are approximately 7.5 apprentices per employer. Even if that estimate is slightly high, reaching national goals will require approximately 45,000 additional employers to participate. That will only happen if we build programs that work for modern learners and modern employers.

Learner Story

Sometimes people who hear me talk about an employer-driven model may be concerned that I have lost sight of the learning worker in the process. Nothing could be further from the truth. When employers are customers, learners benefit because their skills hold real value in a free-labor market. Learners are much like un-polished diamonds. Training does not create value; it reveals what is already there and enables the learner to benefit from it.

Last month, I and other members of the C-BEN team partnered with the Alabama Office of Apprenticeship to host representatives from four states on a nursing-apprenticeship study trip in north Alabama. As part of that trip, we visited the Huntsville Hospital, a huge system, with almost 900 beds serving northern Alabama and the southern part of Tennessee. They face a challenge

universally familiar to healthcare providers across the country. They desperately need more bedside nurses to provide patient care.

Huntsville hospital executive Gretchen Broadway shared with us the personal story of one of her nurse apprentices.

The apprentice grew up in a house where both parents struggled with substance abuse. To escape, she left home at 17 and lived out of her car. She wanted to go to college, but she needed a job because she was living on her own. The answer to her prayers was a nurse apprentice program at Wallace State Community College in Hanceville. That apprentice program provided her classroom instruction and on-the-job training that led to a nursing credential. Critically important, the apprentice program also paid her enough that she could be self-sufficient and financially stable.

She successfully completed her apprenticeship program, passed the NCLEX nursing exam on her first attempt, and earned her RN nursing license. Today, this young lady is a registered nurse working full time at Huntsville Hospital. She's married, is a homeowner, has one child, and is expecting twins in a few short weeks. Her whole life turned around because of an apprenticeship pathway that was built through a partnership between the hospital and the college.

Her story is one of thousands of examples. Apprenticeship is one of the clearest pathways to self-sufficiency and mobility in America. With apprenticeships, people are incentivized to learn and are given the economic tools to make something greater of themselves. Apprenticeships are not just for fresh-faced high school graduates. From this young lady living in her car to a young man who went from prison, to apprenticeship, to state employee, to state director of apprenticeship, there isn't an age, a demographic, or a background that cannot benefit from an earn and learn approach that rewards competency.

Success stories like these are an example of what can happen when states can directly support their citizens' professional growth. As President Reagan said, "The best social program is a job". The most recent public figures from the 2025 iteration of Alabama's apprenticeship expansion incentive program show that apprentices were earning an average starting wage of \$21.63/hour. Considering this starting wage is likely to be approximately 65% of the finishing wage, these are not just any jobs. These are the kinds of career opportunities that bring people off the couch and into the workforce.

Of course, it isn't just Alabama struggling with labor force participation. The national labor market participation rate continues to be a trouble spot in our economy. New figures should come out from the Bureau of Labor Statistics at the end of this week, but the most current numbers show the country is still below the pre-pandemic rate of 63.3%. In a country where just 1% of the working age population is approximately 2.3 million people, our success depends on creating viable paths for entering the workforce.

All of this begs the question, what exactly is C-BEN doing to scale modern competency-based apprenticeship?

Project on Apprenticeship Standards and Interoperability (PASI)

The evidence is abundant and clear: apprenticeship works. The challenge before us is to build a scalable national apprenticeship system that can attract more apprentices to more industries and facilitate employers in being active participants in growing their own talent. That will require a national apprenticeship system that works for both learners and employers, ensures quality at every step, and thrives in all 50 states and territories.

That's what we are working to do at C-BEN. In my new role, I lead the Project on Apprenticeship Standards and Interoperability, otherwise known as PASI which we pronounce 'PAY-zee' because the other way ('pass-ee') sounds 'passive' and this plan certainly isn't that.

PASI is a national project fully funded by the U.S. Department of Labor and created through a cooperative agreement with the Alabama Commission on Higher Education. It is a state-led approach to modernize and scale apprenticeship by:

- enhancing the quality and consistency of industry of industry-driven training,
- increasing transparency into what apprentices know and can do, and
- supporting interstate portability of the apprenticeship training and credential.

While these goals sound grandiose, I am a firm believer that hope is not a strategy. PASI will take practical steps and deliver demonstrable results. To these ends, the PASI team at C-BEN will not set itself up as the arbiter of quality. Instead, we will quarterback the work, building consensus among states and leading the development of tools and processes to capture the breadth of expertise currently siloed all throughout the American apprenticeship landscape. This work is about building a system and establishing practices that will continue beyond the end of the project period. Some of the major activities of PASI are:

- **Establishing Consistent Definitions** - According to a quote often attributed to Socrates, "The definition of terms is the beginning of wisdom." With the rising acclaim and often poor understanding associated with apprenticeship, it is no wonder people mis-label all kinds of work-based learning programs as apprenticeships. This leads to confusion among stakeholders and the diminishment of the apprenticeship model. PASI is undertaking to create a plain-language set of definitions for the various forms of work-embedded learning to bring clarity and improve communication. Once established by general consent of the states, we will seek endorsement and utilization by as many relevant entities as possible. The more broadly terminology is used correctly, the more firmly that correctness is established.
- **High Impact Occupation (HIO) Assessment** - Based on Alabama's success with the 'Five Part Test for In-Demand Occupations,' PASI will coordinate states in developing a similar test for high-impact occupations. The Alabama test looked for occupational characteristics

like paying at least 70% of the median wage for the region, showing positive growth over the next decade, and requiring some kind of postsecondary degree, certification, or credential for initial employment. By working with the states to develop an HIO assessment, PASI will give a consistent and objective model to help states determine what should be supported by way of an apprenticeship.

- **National Quality Framework** - C-BEN has an already established and widely-recognized process by which to evaluate competency-based education. Making use of this and partnering with the Urban Institute to take advantage of their expertise in developing on-the-job learning competencies, PASI will work with states to create a rubric for evaluating the related technical instruction (RTI) and on-the-job learning (OJL) of apprenticeship programs. This rubric will only be used to assess those two core components of an apprenticeship work process.
- **National Evaluation and Apprenticeship Standards Library** - Using the national quality framework, C-BEN will lead states in conducting reviews of the RTI and OJL of existing apprenticeships in high impact occupations. Only apprenticeship work processes that are currently being used by employers will be eligible for review, thus keeping employers in the driver's seat. As states conduct reviews, the work processes will be uploaded to an improved apprenticeship standards library to be built upon the existing apprenticeshipstandards.org. States will have the opportunity to 'pre-vet' work processes. They will indicate if the particular work process:
 - is acceptable for registration in their state,
 - meets state licensing requirements (if applicable),
 - earns a credential of value according to the state,
 - is a degree-bearing apprenticeship.

The results of this pre-vetting will be to save time and money for new sponsors seeking to register in a state by giving them ready access to multiple examples of RTI and OJL they know will be accepted. For multi-state employers, the benefit will be even greater because they will be able to identify work processes that will be acceptable in all the states in which they plan to work. From a national perspective, we will be able to identify any work processes that rise to the top by having very wide acceptance. Thus, we are able to determine a national gold standard for training an occupation based on a field-driven approach.

- **New Work Processes** - An additional small but important component of PASI's work will be to write new national occupational frameworks and help build statewide implementations when no good scalable models are available for an occupation. This work will be almost exclusively in new and emerging apprenticeship sectors and will serve to establish baselines in multiple states for programs like nursing, education, or other fast-growing sectors.
- **Data Enhancements to Improve Quality and Portability** - The federal apprenticeship database system called RAPIDS has some significant shortcomings. PASI will coordinate with the USDOL Office of Apprenticeship to develop recommendations for a new occupational classification and numbering system to be used in RAPIDS. This will improve

transparency and portability by better aligning job titles with actual training and creating a process by which employers or apprentices can go into the apprenticeship standards library to see the specific training requirements an apprentice has completed.

Through these concrete steps, C-BEN will use PASI to help states put highly skilled workers into high impact occupations. From those occupations, they gain the economic freedom known as ‘the American dream’, while also putting our nation firmly in position to forge its own economic destiny.

Apprenticeships are postsecondary education. We will build better connections between learners, higher education institutions, and employers so that apprenticeship is not a separate siloed activity, but a vital and viable part of the larger learner, worker, and employer ecosystem.

We will give states, registration agencies, intermediaries and funders an objective way to prioritize apprenticeship and work-embedded learning efforts that maximize results for businesses, state residents, and state economies.

Call To Action

To help PASI succeed and to help strengthen and modernize the apprenticeship system in our country, there are several legislative actions Congress should consider taking.

Move fully to a State Apprenticeship Agency (SAA) system. Today, the U.S. Department of Labor Office of Apprenticeship is directly engaged with people conducting the day-to-day implementation and execution of apprenticeship programs. In states without a State Apprenticeship Agency, the OA staff often deals directly with apprenticeship sponsors on everything from past due completions to pay scales, and printing completion certificates. That would be analogous to the U.S. Department of Education directly supervising a high school. It is not a normal arrangement for a federal agency and would require the federal Office of Apprenticeship to be massive in order to be effective. States are much better suited to meet the needs of local apprenticeship programs, and, coupled with a formula-funding approach, states can do the work of expansion and oversight much more effectively.

Apprenticeships are not short-term training to get someone just any job. They are commitments by employers to become co-producers of talent. Our current approach means that states, industry associations, and others trying to expand apprenticeship are constantly pursuing the next funding cycle. This leads to fits and starts of activity and makes any long-term planning very difficult. Formula funding would establish predictability and sustainability on which the entire system could be based. A model of consistent and predictable funding for states to carry out the work of scaling apprenticeship would mean less wasted time and effort chasing the next grant, less loss of momentum as grants are constantly starting up and winding down, and less loss of

state apprenticeship expertise as the grant cycles swing. A funding model not unlike the one used for CTE Perkins funding could accomplish these goals. States could be incentivized to pursue growth targets or other special activities of the administration, but their core functions would not be subject to grant whims.

Reduce bureaucracy by requiring recalibration of apprenticeship council authorities. The single biggest complaint about apprenticeship from industry is the red tape that needs to be cut to register a new apprenticeship program. This is a problem of our own making. A significant portion of the frustrating regulations have been created by state apprenticeship councils (SACs) who have, over many decades, been allowed to assume outsized executive authority over an SAA. Many, but not all, of these regulatory SACs have created protectionist policies that actively prevent interstate portability of either the registration of new programs, or of the apprentices themselves. Such policies hurt competition and innovation. The current National Apprenticeship Act and related guidance in the Code of Federal Regulation do not provide the USDOL Office of Apprenticeship (OA) sufficient authority to pull the authority back within the state apprenticeship agency. While it seems counterintuitive to say legislation can reduce bureaucracy, legislation that clarifies the roles of these councils and/or gives OA the clear authority to direct states to rework their program approval systems could be a boon to reducing multi-state employer apprenticeship programs.

Support interoperability over reciprocity. The goal is usually described as ‘reciprocity’, but that term is ill-defined, and it’s a source of major frustration for multi-state employers. The code of federal regulations says in 29 CFR 29.13(b)(7) that states must,

Accord reciprocal approval for Federal purposes to apprentices, apprenticeship programs and standards that are registered in other States by the Office of Apprenticeship or a Registration Agency if such reciprocity is requested by the apprenticeship program sponsor. Program sponsors seeking reciprocal approval must meet the wage and hour provisions and apprentice ratio standards of the reciprocal State....

The strength of the idea and the reason it doesn’t work are both in that section. Since states are the ones closest to the work and to the voices of their employers and citizens, state control of things like prevailing wages, ratios, and other unique policies is not inherently bad. States often put up their own funds to expand their specific priorities in apprenticeship. As such, they are naturally going to require that programs are registered through their office to receive those supports. I can envision no realistic scenario where a state will give its funds to an apprenticeship sponsor who didn’t register with them and isn’t subject to their review. All of these things mean truly automatic reciprocity is not practical. Interoperability — that is, devising clear and consistent definitions of the competencies embedded in the core components of apprenticeship — avoids traditional road blocks and moves us much more practically toward the goal of “off-the-shelf” registrations.

Remove time-gating. According to the Code of Federal Regulations, apprentices are required to receive a minimum 2,000 hours of on-the-job training to complete their program. There's nothing magical about that number, but it's nevertheless embedded into federal apprenticeship law. With the advent of competency-based OJL in apprenticeship, the time requirement has begun to fall away already. For competency-based programs, most states are reading the 2,000 hour requirement as a guideline to indicate the total apprenticeship should not require less than a year of on-the-job learning, but they are not asking apprentices and employers to track time.

Use a high impact occupation assessment to determine suitability. With that said, not every job requires an apprenticeship. Often, a much shorter form of training will suffice. A person may benefit from an apprenticeship when learning how to be a hotel manager, but there's no reason a person would need an apprenticeship to be a hotel maid. To be clear, the job of hotel maid has value and dignity. It simply doesn't require the kind of formal coursework and training associated with an apprenticeship.

Codify the levelization of apprenticeships. Along the same lines, not all apprenticeships represent the same depth and breadth of competency. Reiterating that apprenticeships are postsecondary education, consider this parallel. If the paper I got from Auburn when I completed my study just said 'Science Education', but didn't indicate if it was some kind of introductory non-credit program, a bachelor's degree, a masters, an education specialist degree, or even a PhD, an employer seeking to hire me would not have a good indication of the depth of my knowledge. This is what happens with the apprenticeship credential when every completer receives an un-leveled credential that future employers have no way of understanding. If apprenticeships were given level indicators like those used in the International Standard Classification of Education (ISCED), it would make transparent the difference between the depths of training among various apprenticeships.

Close

Apprenticeship should be about the development and demonstration of competency - not how much time one spent on the job. It should be about being able to demonstrate skills that meet certain standards at a level that employers' expect. Time on task doesn't equate to talent. Demonstrated skills, abilities, and competencies equate to talent.

I would like to thank all of the committee members for the invitation to speak at today's hearing and for their time and attention during my testimony. I would be pleased to take any questions you might have.

Appreciations

I would be remiss if I failed to put my gratitude into the record for the many partners and friends who have worked alongside me for years to bring the benefits of apprenticeship to more Americans. I owe special thanks for the tireless efforts of Dr. Stephanie Dolan and the team at the Alabama Commission on Higher Education for taking a chance on me and PASI. Likewise, I will be forever indebted to Charla Long and my new colleagues at C-BEN for their open arms and their passionate vision for building pathways that work for learners, educators, and employers. Thanks to Meredith Smith for being a confidant and now outstanding leader of the Alabama Office of Apprenticeship, unequivocally, the best SAA team in the nation. Thanks to Nick Moore, formerly of Governor Kay Ivey's office and now leading the federal Office of Career Technical and adult education, for the vision and energy with which he has helped push Alabama's workforce forward. Thanks to the members of the National Association of State and Territorial Apprenticeship Directors for the leadership they show every day and the support they are giving to the PASI project. Most importantly, I must thank my wife Cynthia and my family for the grace they show me as I spend way too much time away from them working on a job they don't quite understand.