

Discussion Paper

Apprenticeship Reform

December 1996

A Message from the Minister:

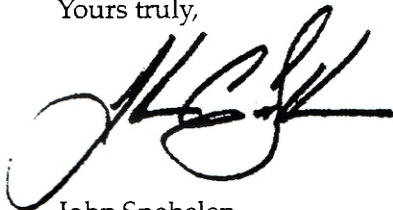
This discussion paper was written to encourage your involvement in the reform of apprenticeship training in Ontario. It outlines the challenges facing the apprenticeship training system and the alternatives the Ontario government is considering. It then poses questions that will help us discover your views. As employers, workers, apprentices, trainers, and educators, you have the greatest stake in the apprenticeship system. Your responses can help us develop made-in-Ontario solutions to the challenges we face. Written responses to this paper must be received by March 15, 1997.

A focused set of consultation meetings will be held in January and February.

Your comments will help shape new apprenticeship legislation, which is expected to be introduced in the spring of 1997.

Your participation in the reform of apprenticeship training and your active involvement in the training system will help to ensure that Ontario continues to have the skilled workers it needs for a healthy economy.

Yours truly,

A handwritten signature in black ink, appearing to read 'J. Snobelen', with a large, stylized flourish at the end.

John Snobelen
Minister of Education and Training

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A. The Role of Apprenticeship Training

Apprenticeship is a method of learning in which practising experts pass on knowledge and skills to learners in a workplace setting. It is an effective form of training that is widely supported and used around the world to address the needs of employers in dozens of industries.

Apprenticeship is predominantly based in the workplace, with more than 75 per cent of training taking place on the job. As a means of preparing people for a wide variety of occupations, the apprenticeship system has clear advantages over exclusively classroom-based skills training. For example, because apprentices are employed as workers, their training helps them develop the skills actually required in existing or emerging jobs in real workplaces. Apprenticeship training thus helps people acquire relevant skills that will help them find – and keep – secure, well-paying jobs.

The training standards in apprenticeship programs are recommended by employer and employee representatives of industry, and form the basis of the certification process upon successful completion of an apprenticeship. Apprenticeship graduates are highly employable and mobile in the labour market because employers know exactly what skills a certified worker has to offer.

Apprenticeship is a key element in Ontario's training system. By helping build a skilled labour force, apprenticeship enables the province to attract the investment it needs for economic growth and job creation. The continuing availability of high-quality training is an essential part of a strategy to make Ontario an attractive place for businesses to invest in, and to enable Ontario's businesses to be competitive in domestic and world markets.

From a public perspective, apprenticeship training is highly cost-effective. Employers, while covering most of the costs of training, have productive employees in the workplace instead of away at school for long periods of time – workers earning wages while they learn.

B. Why Reform Apprenticeship?

While apprenticeship is an excellent model of training, Ontario's apprenticeship system has long been in need of reform to enhance its potential for promoting economic growth and job creation. Indeed, many of those involved in apprenticeship – including business, labour, and training deliverers – have called for reforms to increase the effectiveness of the system. Studies have consistently found that the system needs to be more responsive to the training needs of business.

The present system is governed by a rigid legislative and regulatory framework that has dictated a "one-size-fits-all" approach. The result is that the present program model is not flexible enough to meet current industry training needs or to allow the development of apprenticeship programs to fit new businesses and jobs. Reform is needed to allow for different models to be tailored to each industry's particular requirements. We need to increase flexibility in order to keep what works now, while building on the system's strong partnerships in order to adapt to changes in the labour market and in the workplace. We need to re-examine where government intervention is required, and find new ways of achieving the desired outcomes of apprenticeship training without unnecessary and costly regulation.

Today's apprenticeship infrastructure is almost entirely funded and managed by government. The Ontario government is in the process of re-evaluating how it delivers and funds its core businesses. In apprenticeship, this will mean ensuring that the system operates in a cost-efficient manner and that all those who benefit from the system have a financial stake in making it work.

The Federal government's decision to withdraw its contribution to the cost of in-school training after 1999 also provides further impetus for reform.

The challenge of apprenticeship reform is to create an appropriate balance between two sets of goals. On the one hand, reform should lead to improved efficiency and flexibility and reduced regulation. On the other hand, it should ensure that skilled tradespersons meet high-quality, appropriate standards; that access to programs and certification is improved; and that the range of programs to meet new needs is expanded.

C. Objectives of Reform

This reform process will touch on a number of areas, with a view to building on the strengths of apprenticeship as a learning system. It will look at:

1. a new legislative and regulatory framework that would:
 - facilitate the expansion of apprenticeship to new trades and new areas of economic growth;
 - be more flexible and responsive to the training needs of industry;
 - focus on training outcomes rather than processes and procedures;
 - encourage greater stakeholder ownership of the system;
 - continue to provide essential protections and controls in the areas of health and safety;
2. the roles and responsibilities assigned to various players in the apprenticeship system to ensure that they are appropriate and able to be carried out effectively;
3. ways of establishing an administrative infrastructure which promotes accountability, quality control, and accessibility, and which can accommodate the expansion of apprenticeship partnerships and participation by industry;
4. a more cost-effective and sustainable approach to apprenticeship funding;
5. ways of making it easier and more attractive for youth to enter apprenticeship, and ways of incorporating apprenticeship – a workplace-based, industry-driven approach to training – into other education and training initiatives that are under way in Ontario.

D. Background

1. A Brief History

When the *Ontario Apprenticeship Act* was first passed in 1928, it dealt with training of "minors" between the ages of 16 and 21 in the construction trades of bricklayer, mason, carpenter, painter, and plasterer. Additional trades were added one by one over the next few years. In 1944, compulsory certification was introduced for the trade of motor vehicle repairer in order to protect the public from the consequences of faulty work.

In 1963, the Act was revised to allow applicants 16 years of age and over to enter apprenticeship training programs. Significant new reforms came about in 1964, when the recommendations of the Select Committee on Manpower Training were adopted. The *Apprenticeship Act* was replaced with the *Apprenticeship and Tradesmen's Qualification Act*, and the apprenticeship training system as we know it today came into effect. Since that time, only minor changes have been made to the legislative framework, including a name change to the current *Trades Qualification and Apprenticeship Act* (TQAA).

2. Apprenticeship Now: An Overview

Apprenticeship training is a partnership among many players. These include: *individual employers*, who provide on-the-job training to the apprentice; *apprentices*, who make a commitment to train in a specific apprenticeship occupation; *business and labour representatives*, who work with the provincial government to develop training standards and examinations; *community colleges* and other trainers, such as *union training centres*, which deliver "in-school" theoretical training; and the *provincial government*, which administers the system through a network of 26 field offices and staff, and provides funding for in-school training. Employment Insurance currently funds income support for apprentices during their in-school training, and contributes to the cost of in-school training.

Trade Regulation

There are currently 67 designated apprenticeship trades covered by 41 trade-specific regulations under the Act. Designated trades are recognized in the regulations as either "compulsory" or "voluntary" in nature. Of the existing designated trades, 19 are regulated on a compulsory basis, meaning that registration as an apprentice or a Certificate of Qualification as a journeyperson is legally required in order to work in the trade. Designation as "compulsory" tends to be associated with those trades

Current Size of the Apprenticeship System in Ontario

Sector	Employers	Active Apprentices	Journeypersons and Completed Apprentices
Construction	8 200	14 800	190 000
Motive Power	6 000	10 800	125 000
Industrial	3 600	6 500	72 000
Service	3 600	6 500	115 000
Other	5 100	9 100	15 000
Totals	26 500	47 700	517 000*

*As of August 1996. Numbers are rounded.

in which issues of public safety are involved. The 19 compulsory trades are, for the most part, in the construction and motive power industries. The remaining trades are regulated on a voluntary basis.

Regulations define particular trades and describe in detail the work performed. They may also specify any entry requirements for the trade, such as age and education levels. Some trade-specific regulations also include minimum wage levels for apprentices and prescribe allowable ratios of apprentices to journeypersons in a workplace.

In addition to the 67 designated trades, there are approximately 200 "employer-established" or "non-regulated" trades governed by the General Regulation of the Act. These are developed specifically to meet the training needs of individual employers, or small groups of employers. Unlike the designated occupations, in these trades the skill sets required tend to be firm-specific and not portable across an industry or groups of firms. Many of these trades eventually expand to become designated trades under the Act.

Designated trades under Ontario's legislative framework may also be recognized as interprovincial trades. In these cases, special interprovincial examinations are offered for "Red Seal" certification; these certificates allow journeypersons to move between participating provinces without requiring recertification or formal assessment of competence. There are currently 32 Red Seal trades recognized across Canada.

New apprenticeships may be developed at the request of business or labour representatives of the industry. Typically, a steering committee of employer and employee representatives is organized to determine skill sets for the occupation. If the occupation grows and shows potential for province-wide applicability, it may then be designated through the creation of a trade-specific regulation under the TQAA.

Enforcement of certification requirements is carried out for the construction and motive power trades by Ministry of Labour health and safety inspectors; for other compulsory trades, enforcement is complaints-based and is performed by the staff of apprenticeship field offices.

Structure of Training

Under the Act, all apprenticeships must have a minimum duration of two years, and all apprentices must be at least 16 years old with Grade 10 education.

Apprenticeship training starts with a contract signed by three parties: the individual employer, the apprentice, and the province. The contract sets out the employer's agreement to provide on-the-job training to a standard recommended by industry representatives, and the apprentice's agreement to work for the employer, receive training, and attend school when notified to do so. The signature on behalf of the Ontario government verifies that (a) the employer is able to provide quality training; and (b) the apprentice's working conditions meet requirements set out in the regulations.

The in-school component of training comprises from 10 to 25 per cent of total apprenticeship training, and is purchased by the province.

Almost 95 per cent of in-school training takes place at Ontario's Colleges of Applied Arts and Technology (CAATs), which provide training for a total of 65 occupations. In-school training for about 25 trades is also provided by 19 other delivery agents. Many of these schools are union-operated and/or union-sponsored, or are jointly operated by trade unions and business. Others provide community-specific training for clients who have difficulty attending school because of their locations or lack of income support. Still others are sponsored or supported by employers with specific and large-scale training needs.

In 1996-97, about 15,000 apprentices will attend in-school training.

Training Standards

The apprenticeship system is based on province-wide training standards. Standards provide the mechanism to match the training provided to the needs of industry. They take the form of detailed training outcomes – or “competencies” – and form the basis of in-school curricula and skill-based examinations leading to the certification of skilled journeypersons. They are also used to assess prior learning or experience for clients not trained in Ontario, but who are able to document employment experience equivalent to the apprenticeship program.

Province-wide standards for apprentices are extended beyond Ontario’s borders through the Red Seal Program. Provinces have agreed to expand the Red Seal Program and other initiatives to further the mobility of skilled workers.

Province-wide standards ensure employers that journeypersons and apprentices are able to perform their trades to standards that are clear, measurable, and comprehensive. The economy as a whole benefits because skilled tradespersons have the mobility to respond to shifting labour market demands.

Standards for regulated trades are developed through government-sponsored Provincial Advisory Committees (PACs) composed of industry practitioners representing employers and employees, and are validated through an extensive network of trade experts. (For some employer-established trades, steering committees take the place of PACs.)

PACs are appointed by the Minister of Education and Training under the Act to provide advice on matters relating to the establishment and operation of apprentice training programs and trades qualifications. Such matters may include all training requirements for the trades; training standards, in-school curricula, and exams; regulations; structure of training; and access to certification for tradespeople trained outside Ontario.

There are currently about 25 active PACs, with several more under development. Employers and unions, or other employee representatives, contribute significant amounts of time, some travel expenses, and expertise to the apprenticeship training system through the development and validation of standards and examinations, and through participation on PACs and other governance bodies.

Administration and Client Services

The province supports the administration of the apprenticeship program through a network of 26 field offices across the province.

The network provides a variety of client services. These include:

- **employer-centred services**, e.g., assessing employer training needs, recommending appropriate training programs, developing training plans, and helping to implement training programs;
- **administrative services**, e.g., registering apprentice contracts, delivering examinations, scheduling and following up on the in-school component of programs, providing assessment of qualifications, and processing renewal applications for journeypersons who hold certificates of qualification;
- **program-enhancement services**, e.g., promoting and marketing apprenticeship programs, monitoring on-the-job training, and acting as a third-party advocate for clients, including providing individual counselling.

Activities of Provincial Apprenticeship Field Services*

Clients in In-school training	Apprentices registered	Employer consultations	Exams delivered	New certificates issued
15,000	11,000	8,000	22,000	9,000

*Average activity per year

The combined cost of this administrative infrastructure, the development of training standards, and the management of the program is about \$18 million annually.

Through the Act, the Minister of Education and Training delegates authority for administration of the system to the Director of Apprenticeship. As the Minister's delegate, the director has the authority to sign and issue certificates of qualification and certificates of apprenticeship, and approve training programs and delivery agents.

The Director of Apprenticeship may also appoint representatives to Local Apprenticeship Committees (LACs), local-level bodies which may act as collective employers for apprentices, and which provide advice on local issues.

The director has some discretionary powers under the Act – such as the power to exempt individuals and work sites from some lesser regulatory provisions. These powers have tended to be controversial and/or difficult to implement.

E. Issues for Discussion

The material that follows outlines issues in four broad areas of discussion and poses some key questions for your consideration in preparing responses. The four areas covered are legislation/regulations, management of the system, funding, and partnerships.

1. The Legislative and Regulatory Framework

The following key features are covered in the Act, its General Regulation, and its trade-specific regulations:

- the roles and responsibilities of the Minister, the Director of Apprenticeship, and the PACs in setting policies and promoting and supporting apprenticeship training;
- definitions of employers, including LACs;
- definitions of trades, including compulsory and voluntary status, trade descriptions, wages, and ratios;

- the content of training, including descriptions of on-the-job, in-school, time-based, and competency-based training components;
- entry requirements and durations for the apprenticeship program generally, and for specific trades; and
- provisions to ensure labour mobility through designation of interprovincial Red Seal occupations.

The current regulatory framework provides no consistent and clear rationale for what is regulated and why.

In addition, there are inconsistencies between the Act and its regulations. For example, the Act requires all apprenticeship programs to be two years long and to be subject to compulsory certification. However, the trade-specific regulations associated with these provisions may stipulate the duration of training in an entirely different way, and, in most cases, exempt trades from the compulsory certification requirement.

Another area of inconsistency is the way in which various trade regulations describe training requirements. Some regulations set out learning outcomes or competencies, while others require specific numbers of hours of work experience, or a combination of the two approaches.

The current Act also restricts the role of individual stakeholders and the potential for expanding the system. For example, the act stipulates that PACs are advisory only and have no statutory authority to govern their trades. As government re-examines its role, it needs to consider enabling such industry structures to assume greater responsibility for and control over their apprenticeship programs. Under the current Act, however, such a realignment of responsibilities would not be possible.

In some instances, the current Act has proven to be cumbersome and difficult to implement. For example, the process for designating a Red Seal occupation requires that an entirely new regulation be developed. This causes unnecessary delays in the expansion of Red Seal designations and therefore undermines Ontario's commitment to labour mobility.

Methods of drafting legislation and regulations have changed significantly since 1964. It is time to redesign the Act to ensure that it is appropriate in its scope and in its provisions for delegation of authority for the operation of the apprenticeship system.

Questions:

- 1a) What elements of the apprenticeship training system should continue to be addressed in legislation? What elements should be mandatory and consistent across all trades? For example, do the minimum duration and entry requirements for all programs need to be in legislation and the same for all trades?
- 1b) What elements of the system should be addressed in a general regulation and consistently applied across all trades? For example, should certification of qualified tradespeople be consistently required for all trades? How should training requirements be described in regulation?

- 1c) What elements of the system should be addressed in individual (either industry-specific or trade-specific) regulations? For example, should the compulsory or voluntary certification status of a trade be set by individual regulation?
- 1d) Are there alternatives to legislation that might be used to achieve key objectives related to industry involvement in setting standards, consumer protections, ensuring worker health and safety, and monitoring the supply of skilled labour?
- 1e) What aspects of regulating and operating the system should be explicitly delegated by the Minister to partners in the apprenticeship system?

2. Roles and Responsibilities in System Management

The current structure for delivering and administering apprenticeship programs dates from the 1964 Act. The Ontario government's emphasis on enhancing the competitiveness of Ontario businesses calls for a structure which ensures that high-quality, appropriate standards are maintained, while encouraging innovation in the content and methods of training programs. In light of these priorities, the structure of the existing apprenticeship system is no longer as appropriate or as effective as it needs to be.

At present, Ontario apprenticeship field staff have an average caseload of 450 apprentices each. Their time and energy are consumed by such tasks as contract registration, school scheduling, apprentice follow-ups, and dispute resolution. They have little time for much-needed program-enhancement or program-development activities.

Many administrative services that are currently staff responsibilities could be delivered by other partners – including training instructors, employers, and even apprentices themselves.

Some program-enhancement activities, such as monitoring on-the-job training, program management, counselling, and client advocacy, as well as program promotion and marketing could also be performed effectively by others. Colleges and industry itself could undertake marketing and promotion. Counselling for program applicants could be provided by such agencies as Youth Employment Counselling Centres, college student-assistance offices, and private vocational counselling services. Industry already plays a strong role in monitoring on-the-job training and ensuring that standards are met.

Changes have already been made in response to the need for flexibility and increased efficiencies. Colleges and other trainers are exploring alternative methods of providing in-school training. Colleges are also investigating the potential to merge their technical/vocational programs with similar apprenticeship programs. The use of new technologies, distance education, and self-paced learning as a substitute for traditional classroom or workshop training are other areas with considerable potential.

Questions:

- 2a) Which apprenticeship services need to be directly delivered by the Ontario government? What mechanisms are possible to ensure effective and financially accountable program delivery?
- 2b) Industry, both business and labour, plays a significant role today in managing the system, through its involvement on PACs and in setting standards. What other aspects of apprenticeship training might benefit from increased industry influence and involvement? Are there additional functions that industry is uniquely qualified to perform?
- 2c) Ontario's community college network is well-positioned to assume more responsibility for some aspects of apprenticeship program delivery, in addition to in-school training. Which aspects of program delivery could be assumed by the college system?
- 2d) In what areas of their training program could/should individual apprentices be asked to assume greater responsibility?

3. Funding

The direct costs to the taxpayer of Ontario's apprenticeship system are as follows:

- The Ontario government funds the overall administration of the system (about \$18 million in 1996-97). It collects about \$2.3 million in certificate renewal fees to offset some of these costs. The province also funds the purchase of in-school training (\$15 million in 1996-97.)
- The federal Employment Insurance fund is used to purchase in-school training (up to \$38 million in 1996-97), and to provide income support (about \$38 million in 1996-97) to eligible apprentices.

This Employment Insurance (EI) contribution to Ontario's apprenticeship system is funded entirely by employers and workers. Together, these two groups in Ontario paid more than \$7.8 billion in EI premiums in 1995, while EI benefits and training funds spent in Ontario totaled about \$3.8 billion.

Almost all federal contributions to training in Ontario are funded by EI premiums paid by employers and workers. In 1996-97, only 27 per cent of EI training funding is being directed to Ontarians, despite the fact that 35 per cent of Canada's unemployed live in Ontario. The Ontario government has called for an equitable share of national EI training funds to be spent on Ontarians.

Indirect costs and funding for apprenticeship are more difficult to quantify. Employers support 75 to 90 per cent of the cost of providing program content through the on-the-job component; they also bear the costs of relatively low productivity during the early stages of on-the-job learning and while apprentices attend in-school training. Some employers also top up income support for apprentices while they are attending school.

Costs to apprentices include some expenses related to attending school, including the loss of wages less the income support provided through Employment Insurance. Apprentices must also purchase tools and in some cases materials, in order to practice their skills.

Employer and employee representatives also contribute expertise and a significant amount of time, and incur some expenses, in order to assist in developing standards and examinations, and to participate in the activities of PACs and LACs.

Colleges and others involved in delivering training cover some of the administrative and overhead costs related to the delivery of in-school training. They also devote time and contribute expertise to the development of curriculum standards for the in-school portion of training, and participate in planning and consultation committees and PAC activities.

Factors that should be taken into account in considering new funding models include:

- the need for funding for in-school training;
- the need for financial support to assist apprentices to attend school;
- the need for funding for administrative functions such as the development of standards, program management, and providing services to clients;
- the revenues from fees paid by clients for such services as certificate renewals.

At present, funds towards these elements are provided by the Ontario government, with contributions from the EI fund. Very little direct cost is incurred by employers or apprentices.

It should be noted that the Federal government has decided to withdraw its contribution to the cost of in-school training after 1999. As a result of this decision, new arrangements for the funding of in-school training will have to be devised.

There are a number of workplace-based training programs which provide examples of successful alternative funding models. For example, modular training programs, established in several occupations (such as hard- and soft-rock mining) primarily to fulfil occupational health and safety requirements, are delivered entirely on the job, with the employer acting as the qualified trainer through a government-accredited system. Cost-shared or fee-payer models have been used

successfully in the industrial metal machining trades at some colleges. Some employers have expressed willingness to pay for training that gives improved access and priority in scheduling to their employees.

A number of different approaches to funding training programs are being used in other Canadian jurisdictions. Possible models include:

- a fee-payer model. The full cost of apprenticeship in-school training is recovered through fees charged by training providers. Clients may also be charged for the cost of such services as contract registration and certification.
- a tuition-based model. Fees are charged to recover a portion of the costs of in-school training, with some additional service fees for system administration. Government subsidies cover the remaining portion of the costs.
- a grant-based model. As with the current model, the government wholly subsidizes the delivery of training by public institutions and provides direct funding to cover the cost of client services;
- a loans-based model. Colleges and service providers charge clients the full costs of training and services, and a loan program is established for clients who need assistance to pay the fees.
- a cost-shared model. Costs are covered by funds from a combination of sources, including partial government subsidy, client fees, and loans to individuals needing assistance to pay fees.

Clearly, the costs and benefits to each partner vary with the different funding models. For example, industry could expect more flexibility and involvement in the design, content, and delivery of training with greater contributions to its cost.

Employers could be in the position of a buyer, able to shop around and obtain the best training at the best price. Providers of training and services could have greater opportunities to recover the costs of delivery. Individuals could have greater influence as fee-paying clients, and greater say in when and how they access training.

Questions:

- 3a) What in your view are the costs and benefits of the alternative funding models described above?
- 3b) Are there changes in the delivery system that should accompany changes to the funding model?
- 3c) What is the appropriate role for the Ontario government in funding apprenticeship?

4. Linkages

Apprenticeship reform is not happening in isolation, but is linked to other government and industry initiatives. In addition, the potential for strengthening ties to a number of existing programs and systems is being investigated. The following discussion highlights some of these areas of activity.

Secondary School Reform

The current proposals for secondary school reform seek to strengthen vehicles – such as apprenticeship programs – that are designed to help students make the transition from school to work. The Ontario Youth Apprenticeship Program – a co-op apprenticeship program for young people in high school – already exists to allow students to gain work experience and earn money as part-time apprentices while receiving credits for in-school training that count towards their high school diplomas.

Curriculum changes in high school and the creation of broad-based technology programs may expand opportunities for students to accumulate work experience before graduation. Such work experience is more likely to improve young people's chances of finding either full-time employment or part-time work during post-secondary education if, like apprenticeship training, it consists of on-the-job training to a standard developed and upheld by industry.

Links with other training and postsecondary programs

Improved provisions for cross-accreditation between apprenticeship programs and related college and university programs can enhance the portability – and hence the usefulness – of apprenticeship training. Under existing conditions, for example, an industrial electrician who wants to work towards an electrical engineering degree may have to repeat several aspects of his or her earlier training to obtain a degree. Arrangements need to be streamlined to allow for transferred credits between institutions.

There is a range of potential models for integrating apprenticeship and postsecondary programs. Some institutions award apprenticeship learning full credit towards diplomas and degrees. Others offer “laddered”, or step-by-step, programs that allow individuals to make the transition from apprenticeship to technician to university degree programs without unnecessary repetition of courses.

The value of modular training programs, mostly developed to provide specific occupational health and safety training, can also be enhanced by improving links with existing or related apprenticeship programs. Again, “modularizing” (identifying components of a program that are generic and that apply to several different occupations) can provide training and experience that are portable across a variety of programs, institutions, employers, and occupations. Opportunities exist to design more training modules, incorporating elements common to many apprenticeship programs (e.g., blueprint-reading competencies relevant to many construction trades), to increase the portability of training across a wide range of programs.

The concept of modular training could also be applied to certification so that someone who completes a set of modules within a program could receive certification at that level. This would increase the training and employment opportunities for young people in skilled trade areas.

Economic development initiatives

The Ministry of Economic Development, Trade and Tourism (MEDTT) plays a role in helping Ontario's businesses and industries invest in training to increase their competitive strength and in ensuring that Ontario's commitment to training is publicized among domestic and international investors. This reflects the Ontario government's awareness of the contribution training makes to economic growth, increased productivity, and the creation of highly skilled jobs in key industries. Initiatives to reform and expand the apprenticeship system thus play a key role in the government's economic development strategy.

Additional legislated training requirements

In some cases, legislation initiated by other provincial ministries establishes training needs that can be addressed using the apprenticeship model of training. For example, several mining training programs are designed to fulfil requirements of the *Occupational Health and Safety Act*; and the Ministry of Transportation and Ontario Trucking Association training requirements for the maintenance and replacement of truck tires are incorporated in the apprenticeship trade regulation for Automotive Service Technician.

Questions:

- 4a) How can apprenticeship improve youth employment prospects? How can apprenticeship be more strongly linked with the secondary and postsecondary education systems?
- 4b) How can we improve cross-accreditation opportunities and procedures and the portability of schooling and work experience between programs and institutions?
- 4c) How can apprenticeship training further promote economic growth and job creation in Ontario?

F. Your role in reforming apprenticeship

This paper is designed to inform you about the issues involved in reforming apprenticeship. Your expertise and experience in training can help us create a truly flexible, modernized, streamlined system that will enable Ontario industries to compete globally and attract new investors to our province. We invite your responses to our questions.

Please send written comments on the issues raised in this discussion paper by March 15, 1997, to:

Apprenticeship Reform Project
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3rd floor, Mowat Block
900 Bay Street
Toronto, Ontario
M7A 1L2

You can e-mail responses to **reformap@epo.gov.on.ca** or fax them to (416) 326-6573.

Copies of this paper are available from the Ministry of Education and Training's homepage at **<http://www.edu.gov.on.ca>** or from the Training Hotline. Call 1-800-387-5656 for more information.

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