



November 15, 2018

Via Electronic Submission: <http://www.regulations.gov>

U.S. Department of Labor
Employment and Training Administration
Office of Apprenticeships
200 Constitution Ave, NW
Room C-5321
Washington, DC 20210

Re: Docket ID No. ETA-2018-0001
Data Collections From Industry-Recognized Apprenticeship Program Accreditors

To Whom it May Concern,

The National Association of Landscape Professionals (NALP) is pleased to have the opportunity to comment on the Department of Labor's proposed information collection request (ICR) *Data Collections From Industry-Recognized Apprenticeship Program Accreditors*.

NALP is the national trade organization representing the \$82 billion landscape industry in the United States. Member companies specialize in lawn care, landscape maintenance, tree care, irrigation and water management. Landscape professionals throughout the nation work daily servicing homes and businesses to maintain their landscapes, sustain the environment and take pride in our communities by enhancing and maintaining healthy green spaces.

I. NALP Commitment to Expanding the Workforce & Promoting the Industry

Businesses and homeowners rely on landscape services and as the economy has grown, so has the demand for landscape services. According to data from the Bureau of Labor Statistics, there were 71,000 unfilled positions in our industry in 2017. Growing, training and developing the workforce is the top priority for our industry and we are aggressively pursuing solutions to our labor shortage.

Recently NALP signed a pledge to train and retrain 150,000 people as part of the President's Pledge to America's workers. We are actively promoting the industry with educators throughout the nation to include landscape industry curriculum in their classrooms. We have invested heavily in promoting the industry to the public to bring awareness on the value and importance

of the landscape profession. And most pertinent for these comments, NALP recently created a DOL approved and certified apprenticeship program for landscape management¹.

The NALP Landscape Management Apprenticeship Program is the result of extensive review, consideration and collaboration among the leaders in our industry from across the nation. We firmly believe that our apprenticeship program is a high-quality opportunity for individuals to enter the landscape industry, get trained in the classroom and on-the-job, while receiving compensation for their work. This is a win-win-win relationship for the apprentice, the company that employs the apprentice and the landscape industry collectively.

Apprenticeship programs offer an alternate path for aspiring professionals to gain expertise in a skilled field and lend credibility towards the expertise, knowledge and critical thinking required to be successful in that field. The professionalism and skills associated with apprenticeship programs are an important component of our mission to grow and promote the landscape industry. The landscape industry has plenty of skilled employment opportunities and the NALP apprenticeship program will assist in demonstrating these opportunities and the value of our industry to prospective professionals while also growing the industry.

II. Industry-Recognized Apprenticeship Programs

NALP supports the expansion of apprenticeships in America directed by President Trump² and further elaborated by the Task Force on Apprenticeship Expansion's Final Report³ ("Final Report") and the DOL Training Employment Notice⁴ ("TEN") issued on expanding apprenticeships.

Industry Recognized Apprenticeship programs represent an opportunity to expand apprenticeship opportunities with more flexibility while relieving some of the burdens and bureaucracy from government control. These are notions that NALP supports, and as the national trade association for the landscape industry and the developer of a DOL certified apprenticeship program we have a vested interest in the further development of apprenticeship opportunities by the landscape industry.

After reviewing the proposed "Industry-Recognized Apprenticeship Programs Accrediting Entity Information"⁵ (hereinafter "Application") we agree with the vast majority of the information requested and the rationale supported in the DOL TEN⁶. We primarily support this information because it is very similar to the type of information that NALP created and provided to DOL

¹ Standards of Apprenticeship Developed By National Association of Landscape Professionals For The Occupation of Landscape Management Technician; O*NET-SOC CODE: 37-3011.00; Rapids Code: 0574 (Certified on May 17, 2018).

² Executive Order 13801, *Expanding Apprenticeships in America*, June 15, 2017 (82 FR 28229).

³ Task Force on Apprenticeship Expansion, *Final Report to: The President of the United States* (May 10, 2018).

⁴ U.S. Department of Labor Employment and Training Administration, *Training and Employment Notice (TEN) No. 3-18* (July 27, 2018.)

⁵ Data Collections From Industry-Recognized Apprenticeship Programs, 83 Fed. Reg. 47643 (proposed September 20, 2018), *Accrediting Entity Information Form*.

⁶ TEN 3-18 at p. 4-8.

when obtaining certification for our DOL certified apprenticeship program. This information is paramount to maintaining a high-quality apprenticeship program and process which includes:

- Detailing the Certification Process
- Transparency and Accountability
- Impartiality and Objectivity
- High Quality
- Paid Work Component
- Educational and Instructional Component
- On-the-Job Instruction
- Safety and Supervision
- Equal Employment Opportunities

The portion of the Application on which we would provide additional input and believe requires additional consideration involves the “Qualification and Structure of Accrediting Body.”⁷ NALP believes that consideration of existing DOL certified Apprenticeship Programs should be required information in this section. Additional questions should be asked how the applying accrediting body relates to the existing structure within that particular industry. NALP would also suggest that the developers of DOL certified apprentice programs be informed and brought into the conversation prior to final DOL approval of any accrediting body within that corresponding industry.

These recommendations are provided not to insulate NALP as the sole developer or accreditor of industry apprenticeship programs but to prevent fragmentation and confusion within the same industry over possibly conflicting apprenticeship programs; a notion supported by the Final Reports Recommendation 9, “to avoid the problem of multiple groups within a sector promulgating conflicting or inconsistent standards.”⁸ NALP would further dissuade the Department from concerns over “the appropriateness of designating a single industry oversight body or requiring agreement and uniformity of standards of becoming a certifies.”⁹

NALP would envision a collaborative process supported by a consortia of industry professionals with tremendous knowledge and expertise spanning the Nation. A similar group of Landscape industry experts were involved in the creation of NALP’s DOL certified Apprenticeship Program and it is our belief that this process is representative of other industries that have created apprenticeship programs. NALP would like to avoid conflicting and confusing programs and standards that only serve to dilute the product and potentially damage the perception of the professionalism and quality of the program, which we expressed above is a paramount component of our ongoing efforts to promote and grow the industry.

NALP further believes that ensuring that existing industry authorities and/or developers of existing DOL certified Apprenticeship Programs are required to be involved in this process

⁷ Data Collections From Industry-Recognized Apprenticeship Programs, 83 Fed. Reg. 47643 (proposed September 20, 2018), *Accrediting Entity Information Form, Section II. A.*

⁸ *Final Report* at. 4.

⁹ *Id.*

better serves the industry to facilitate a dialogue on: existing and changing technologies, regional discrepancies and other new and emerging issues within that particular industry. This consultation required by DOL could result in changes to existing apprenticeship programs or the ability of new accrediting entities to enter the process and tailor different programs within an industry to meet other specific demands while not being in conflict and thus minimizing confusion or dilution of high-quality apprenticeship programs.

III. Conclusion

NALP appreciates the opportunity to provide comments on DOL's proposed *Data Collections From Industry-Recognized Apprenticeship Program*. NALP hopes the comments provided herein will be taken under serious consideration and that the final Industry Recognized Apprenticeship Accrediting Entity Information will include information that requires existing industry accreditors or developers of DOL approved Apprenticeship programs to be notified and involved in the accrediting process in their respective industry.

If you have further questions or concerns please contact NALP directly. We look forward to growing and expanding the offerings of apprenticeship programs while assisting in the collective efforts of training and retraining the American workforce.

Sincerely

A handwritten signature in blue ink, appearing to read "A. Bray", with a stylized flourish at the end.

Andrew Bray
Vice President Government Relations
National Association of Landscape Professionals