



**American Federation  
of Labor and  
Congress of Industrial  
Organizations**

815 16th St., NW  
Washington, DC 20006  
202-637-5000  
aflcio.org

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# AFL-CIO

AMERICA'S UNIONS

November 19, 2018

Deputy Assistant Secretary of Labor Rosemary Lahasky  
U.S. Department of Labor  
200 Constitution Avenue NW  
Washington, DC 20210

Subject: Data Collections from Industry-Recognized Programs Accreditors  
Form: Industry-Recognized Apprenticeship Programs Accrediting Entity Information  
OMB Control Number: 1205-ONEW

Dear Deputy Assistant Secretary Lahasky,

The AFL-CIO appreciates the opportunity to comment on the proposed Data Collections from Industry-Recognized Programs Accreditors Form: Industry-Recognized Apprenticeship Programs Accrediting Entity Information OMB Control Number: 1205-ONEW.

We want to first note our support of the comments of North America's Building Trades Unions (NABTU).

As the Department of Labor seeks to expand apprenticeship programs, it is critically important for the Department to adhere to the provisions and intent of the *National Apprenticeship Act*. The Act requires the U.S. Department of Labor "to formulate and promote the furtherance of labor standards necessary to safeguard the welfare of apprentices and to cooperate with the States in the promotion of such standards" and "to bring together employers and labor for the formulation of programs of apprenticeship."

These principles must be fundamental to any efforts to expand apprenticeship. The AFL-CIO is concerned that the establishment of private, non-governmental accrediting entities has the potential to undermine the key principles of the National Apprenticeship Act, which protect and safeguard apprentices.

The AFL-CIO appreciates the serious effort by the Task Force on Apprenticeship Expansion to consider a number of important issues arising from any potential system of Industry Recognized Apprenticeship Programs (IRAPs). The Task Force on Apprenticeship Expansion noted that the launch of IRAPs "*creates uncertainties for companies, trade or industry groups, educational institutions, labor unions, and other key stakeholders, which could slow the needed expansion of apprenticeships in the United States.*"

Specifically, presentations before the Task Force Subcommittee on Administrative and Regulatory Strategies to Expand Apprenticeship and the Subcommittee White Paper raised, among many others, these issues:

- What will the U.S. Department of Labor do if there are multiple trade or business associations within an industry sector and they develop conflicting or inconsistent industry standards?
- What systems will the U.S. Department of Labor put in place to collect and verify outcomes data for Industry-Recognized Apprenticeship programs?
- How will the U.S. Department of Labor differentiate between high/low quality certifiers, especially since no potential certifiers will have prior experience administering an Industry-Recognized Apprenticeship program?
- How will the Department differentiate between high value and low value credentials?
- What constitutes “sufficient support and input from sector participants” for potential Industry-Recognized Apprenticeship program certifiers?

The federation shares the concerns that members of the Task Force raised over the past year, and believes that answers to these and other concerns will require the collection of specific data from accrediting bodies and program sponsors. Accordingly, the AFL-CIO recommends the following additions to the Information Request Form for Accrediting Entities.

**Section A: Qualifications and Structure of the Accrediting Body.** The AFL-CIO believes it is important for the Department to collect, analyze and publish information on the reach and effectiveness of each accrediting body, and for the overall IRAP system. An effective system will avoid duplicative and overlapping standards, and will provide clear market signals to all participants. Employers, apprentices and policymakers must have the information needed to evaluate individual programs, and to make decisions about the overall functioning of the IRAP system. Additional information should include:

- Which employers are participating in the development and use of each IRAP?
- What are the NAICS codes of the facilities or employers associated with the accrediting body or implementing a particular IRAP?
- What is the geographic coverage of the accrediting body, and of each IRAP it accredits? This should include where the IRAP is fully available to employers and potential apprentices.
- Where is each IRAP in use, and how many apprentices are enrolled in each geographic area?
- What fees and costs are charged to employers?

**Section B: Accreditation Process.** The accreditation process is at the heart of assessing and maintaining the quality and efficacy of any standard-setting system. Workers, students and parents will rely on programs accredited by new, and in many cases inexperienced, organizations to make significant life decisions. Educators, public officials, employers and many others will rely on these accreditations to make business and investment decisions, many of which will be with public funds. On this critical issue, the AFL-CIO agrees with the comments of NABTU and the American National Standards Institute. In addition, the AFL-CIO believes strongly that accrediting bodies must assess outcomes for apprentices and workers in deciding to certify or recertify any IRAP, and that they should have procedures to ensure that accredited IRAPs are keeping up with developments in technology. We suggest the following additions to the Information Form:

- What information will program sponsors be required to provide to ascertain whether the organizations are effectively serving and generating good outcomes for apprentices?
- Does the assessment process include any mechanism for giving apprentices a voice?
- What processes will be in place to monitor the use of new technologies, automation, digital work components and new materials in industries and sectors covered by your accreditation?

**Section C: Paid Work Component.** Paid work, or “earn as you learn,” is a critical feature of apprenticeship, because it assures apprentices that the apprentice program they are entering includes employment and the absence of debt for their education. It is critical that potential apprentices and policymakers have the information needed to assess which IRAP programs meet these criteria. In order to achieve this transparency, the Department should require IRAP accrediting bodies to provide the following information:

- What information on wages, hours worked and apprentice income will each program sponsor be required to provide?
- What information will be required from program sponsors regarding program costs that are to be borne by apprentices?
- What information will be required from program sponsors about any debt incurred by apprentices?
- What information will be required from program sponsors regarding the timing of the beginning of related instruction and the beginning of paid work?

**Section G: Equal Employment Opportunity Requirements.** The AFL-CIO believes strongly that any private system of accreditation, and especially accreditation conferred by the federal government, should not only meet EEO requirements, but must also provide workers and policymakers the information needed to discern the actual performance and outcomes of individual IRAPs. This additional transparency is critical to employer and public confidence when substituting a private system for a previously public function. At a minimum, the Department should collect and publish the following information from IRAP accrediting bodies:

- The information program sponsors will be required to provide regarding the demographic information of apprentices.
- How your organization will summarize and publish this information in a format that is useful to potential apprentices and policymakers.
- How your organization will provide feedback to program sponsors about their performance in increasing opportunity for minorities and underserved populations.

Thank you for the opportunity to provide comments.

Sincerely,



William Samuel

Government Affairs Director