



Dallas County Community College District

November 19, 2018

To whom it may concern,

Please consider our comments regarding Industry-Recognized Apprenticeship Programs Accrediting Entity Information as requested. The numbered sections below refer to sections in TEN 3-18.

1. Validity in Setting Sector Standards.

We believe that the 1st sentence should also include companies because the industry experts is too broad and employers could easily be overlooked.

- “The certifier must show that it is qualified to establish, through a consensus-based process involving **employers**, industry experts, the classroom and workplace...”

5. High Quality.

• Paid Work Component.

- It is not clear if the employer is still responsible for establishing the wage progression or if the certifying body will determine the wage and the employer them must align wages.

• Educational and Instructional Component.

- We believe that the DOL should not give weight to programs that provide college credit. IRAP standards developed would already be more current, of higher quality, and more relevant than most college systems of credit. IRAP certifying bodies would be more aligned with the cutting edge of industry if properly interacting and collaborating through a consensus-based process. Giving an advantage to programs that offer college credit may challenge IRAP expansion.
- We support the move toward competency-based programs but recognize this will be a challenge for higher education.
- Existing regulations and state requirements in higher education create long timeframes for development of new certificates and programs, particularly those that articulate to academic credit. This is not currently compatible with the speed required for an immediate response to pipeline development through IRAPs. A “track” system may be an effective way to separate programs and apprentices for whom academic credit or a degree is desirable, from those programs and apprentices for whom academic credit isn’t a goal, a value-added component, or a necessity. For example, for the new Unmanned Aerial Systems Operator Registered Apprenticeship would be a good candidate for a “non

credit-earning” IRAP. Apprentices can complete in less than a year, FAA and FCC licenses are earned, and there are entry level jobs immediately available in our area at a minimum of \$50K per year with the skills and licenses earned in the apprenticeship, even without a degree.

- **Transparency & Accountability.**

- Seems quite burdensome for certifiers. “make publicly available up to date contact information for all IRAPs it has certified”. “publish for each program the number of individuals who complete annually...and “pre and post program earnings”. With this level of burden, short of federal funding, we don’t see how certifiers won’t be forced to pass costs along to employers and/or apprentices.

Thank you for the opportunity to make comments. If you have questions or need additional information, please let me know.

Thank you,

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