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November 19, 2018

The Honorable Rosemary Lahasky
Deputy Assistant Secretary
United States Department of Labor
Employment and Training Administration
Office of Apprenticeship, Room C-5321
200 Constitution Avenue NW
Washington, DC 20210

RE: Agency Information Collection Activities; Comment Request; Data Collections from Industry-Recognized Apprenticeship Program Accreditors (2018-20436)

Dear Deputy Assistant Secretary Lahasky:

The National Association of Publicly Funded Truck Driver Schools would like to,^[1] thank you for the opportunity to comment on the accreditation^[2] of Industry-Recognized Apprenticeship Programs (IRAPs). Considering the nationwide shortage of truck drivers in the United States,^[3] apprenticeship programs could play an integral role in attracting more jobseekers into the truck driving industry, where entry-level drivers can earn \$40,000 to \$60,000 per year upon completion of training.

Training and Employment Notice 3-18 (TEN 3-18) issued on July 27, 2018 outlines five criteria potential certifiers should meet in order to receive a favorable determination. They are:

- Validity in Setting Sector Standards.
- Clear Policies and Procedures for Certifying Industry-Recognized Apprenticeship Programs.
- Transparency and Accountability.
- Impartiality, Confidentiality, Objectivity, and Independence.
- High Quality.

Of the five criteria established, identifying training providers as “High Quality” is paramount. TEN 3-18 outlines six components training providers must include in their program in order to be determined as high quality. Those components are:

- Paid Work
- Work-Based Learning
- Mentorship
- Educational and Instructional
- Industry Credentials Earned
- Safety and Supervision

As DOL-ETA considers accrediting criteria for IRAPs, it is important to consider that the apprenticeship model will work differently for commercial driver training. Most companies will not hire a driver without a CDL, so the apprenticeship “model” with on-the-job training does not fit in most cases. IRAP should include the pre-CDL training, along with funding for this component. A jobseeker must have a commercial driver’s license (CDL) in

^[1] The NAPFTDS is the only association representing publicly funded (community colleges and technical schools) commercial truck driver training programs in the United States. NAPFTDS members represent 130 training providers in 40 states who collectively train approximately 25,000 commercial drivers annually.

^[2] NAPFTDS notes that the ICR uses “Accreditors” whereas the TEN 3-18 uses the word “certifiers.”

NAPFTDS notes that “Accreditation” is a term of art used in education as a condition precedent for a student’s receipt of Title IV funding (e.g. Pell Grants.). NAPFTDS asks that the Department of Labor clarify whether the term “Accreditor” or “Accreditation” as used in this ICR means “certification” (e.g. a means of establishing independent criteria to denote quality) or whether it is using the terms as a means for qualifying programs to create eligibility for Title IV funding.

^[3] Costello, Bob (October 2017). Truck Driver Shortage Analysis 2017. Page 3. American Trucking Associations, Washington, DC.

<http://progressive2.acs.playstream.com/truckline/progressive/ATAs%20Driver%20Shortage%20Report%202017.pdf>

***RE: Agency Information Collection Activities;
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order to get a job driving a truck. It is not unusual for jobseekers to train with a school and then with a motor carrier. Alternatively, students will attend a motor carrier school and then secure their CDL, and then enter employment with that motor carrier. However, most jobseekers wanting to obtain a CDL must get trained, which comes at a personal cost, and then find a job with a motor carrier that hires entry-level drivers. By the time a CDL holder gets a job with a motor carrier, they already meet baseline qualifications for driving a commercial truck.

If this Information Collection request (ICR) will impose a burden on accrediting or certifying bodies depends, in part, on the exact criteria the DOL will require of accreditors/certifiers. Moreover, this burden will also turn on whether the DOL intends to use the term “accreditors” in the technical sense as it is currently used in higher education, or if the term will simply reference a broader criterion (e.g. non-Title IV) for establishing and evaluating IRAP programs. If used in the latter sense, NAPFTDS believes that associations are capable of listing their requirements, how their programs and procedures meet the requirements as outlined in TEN 3-18 and ensuring due process for all applicants. However, if used as a term consistent in education (e.g. 20 U.S.C. § 1 *et seq.*) NAPFTDS believes that IRAP accreditors will be subject to additional criteria as established under 20 U.S.C. § 1099b. While many of the tenants expressed in 20 U.S.C. § 1099b are laudable and even advisable for associations that establish quality standards, some parts of this section may conflict with the nature or function of why the association was formed, or so severely burden the association’s participation in IRAPs to the point where the associations compliance exceeds the benefit to participating. NAPFTDS, therefore, asks the DOL to use the term “certifier,” or clarify the rules, regulation, and benefits to becoming an “accreditor.”

Respectfully,



Martin Garsee
Executive Director, NAPFTDS