

**Information Collection Request: Comments on Data Collections from Industry-Recognized Apprenticeship
Program Accreditors
OMB Control Number: 1205-ONEW**

(Published September 20, 2018 in the Federal Register)

November 7, 2018

Workcred writes to offer comments on the Information Collection Request (ICR) titled Data Collections from Industry-Recognized Programs Accreditors, published in the Federal Register on September 20, 2018, OMB Control Number 1205-ONEW. Workcred is an affiliate of the American National Standards Institute (ANSI) whose mission is to strengthen workforce quality by improving the credentialing system, ensuring its ongoing relevance, and preparing employers, workers, educators, and governments to use it effectively.

Workcred supports the U.S Department of Labor's (DOL) efforts to develop and grow Industry-Recognized Apprenticeships (IRAPs) and a process to recognize entities to become an accreditor of IRAPs. The combination of IRAP's and Registered Apprenticeships are positioned to be successful strategies to grow apprenticeship across the country and address the skills mismatch facing employers. For IRAPs to flourish and to be valued by employers, students, and job seekers as pathways that lead to both a high-quality education and a career, there must be accreditors to ensure quality assurance that gives industry confidence of quality.

The information that DOL proposes to collect is both useful and necessary for the proper functioning of an accreditation body. The proposed information that will be collected is aligned with Workcred's views that a quality accreditation body should have the following attributes:

- Legal entity, or part of a legal entity, but must have independence from other bodies
- Standard that is validated by the industry
- Structured and managed to safeguard impartiality
- Adequate financial and personnel resources
- Appropriate qualified personnel
- Transparent processes for assessing organizations and how the accreditation decision is made
- Formal application process for accreditation
- Defined accreditation cycle and monitoring process
- Processes for suspending, withdrawing, or reducing accreditation
- Complaints and appeals process
- Management system for continuous quality improvement

In addition, Workcred believes that a quality accrediting body would assess the following elements when looking at an IRAP:

- Standard (framework) and specific requirements to determine a quality apprenticeship and how it was validated with the industry

- Organizational structure and processes to ensure impartiality, objectivity, and confidentiality
- Policy and procedures are adequate and are being followed
- Sub-contracts to ensure the services are being provided and are being monitored
- Financial resources to sustain the program
- Qualifications and training of the personnel to conduct the program
- Quality of the on-the-job (OJT) training to achieve learning outcomes based on the standard – strategies for work-based learning
- Assessment tools with rubrics to evaluate the performance of the apprentice
- Quality of the related instruction to ensure the apprentices obtain their learning outcomes and are in alignment with the OJT
- Adequacy of the program evaluation processes for continuous quality improvement
- Complaints and appeals processes are in place
- Certificates are appropriately awarded

Overall, the proposed collection of data is both necessary and useful to ensure that there is quality in IRAPs. In addition, prospective accreditors should be willing and capable to absorb the estimated costs and burdens.

Quality industry-recognized apprenticeships will help close the skills gap and match American workers with good jobs through a continuous quality improvement process. We look forward to working with the Department to ensure there is an effective quality assurance process that establishes high-quality IRAPs that meet the needs of employers and jobs seekers.

Respectfully,

A handwritten signature in black ink that reads "Roy A. Swift". The signature is written in a cursive, flowing style.

Roy Swift, Ph.D.
Executive Director
Workcred