



National Institute for
AUTOMOTIVE SERVICE EXCELLENCE

October 2018

The National Institute for Automotive Service Excellence (ASE) provides the following comments in regard to the Information Collection Request (ICR) titled, "Industry-Recognized Apprenticeship Programs Accrediting Entity Information", re: 1205-ONEW.

ASE welcomes and supports the development of industry-recognized apprenticeship programs (IRAPs) as an important tool to expand opportunities for American career seekers and help employers meet their growing, unmet need for skilled workers.

IRAPs can serve as a parallel, additional apprenticeship program that complements the success of Registered Apprenticeships in the US by providing an alternative track with fewer complexities and barriers to entry with the same commitment to high program quality and rigor of assessment.

By encouraging and providing a channel for industry representatives, like ASE, to serve as or support qualified IRAP Certifiers, the Department is ensuring that IRAPs will reflect expertise and best practices valued by industry and therefore valuable to the career advancement of apprentices.

ASE is committed to expanding apprenticeship opportunities, looks forward to the Department's pending guidance on the IRAP application for certifiers, and is actively working on new apprenticeships in the automotive industry that reflect industry need.

Minimizing the barriers to entrance for prospective IRAP Certifiers is important to the rapid advancement of the Department's apprenticeship goals. However, ensuring that Certifiers are appropriately qualified; capable of identifying, measuring, and protecting program quality; and can provide the Department, employers, apprentices, and taxpayers, with the data needed for oversight and informed decisions is vital.

We have reviewed the data elements proposed for the Information Collection Request (ICR) and believe they are both appropriate and reasonable in forwarding effective, high-quality IRAPs. Furthermore, the Department's assumptions and logic behind the estimates of costs and burdens seem reasonable and reflect an administrative burden that individual, prospective respondents should be willing and capable of absorbing. The less paper work and the ability to streamline data collection would be extremely helpful.

We look forward to working with the Department and our employer partners to advance industry driven pathways to great careers in the United States.

Sincerely,

Tom Richardson