



**Comments from the
American National Standards Institute on
Data Collections from Industry-Recognized
Apprenticeship Program Accreditors
OMB Control Number: 1205-ONEW**

November 15, 2018

The American National Standards Institute¹ (ANSI) welcomes the opportunity to provide its 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. ANSI supports the U.S Department of Labor's (DOL) efforts to develop and grow industry-recognized apprenticeship programs (IRAPs) and a process to recognize entities to become an accreditor of IRAPs. Accreditation, as per national standards and rigorous process, is critical to provide confidence to employers, industry, and job seekers that the IRAPs are competent to offer high-quality apprenticeship programs. A strong quality assurance component is important for the IRAP programs to be successful and contribute to skill development.

ANSI represents the interests of more than 270,000 companies and organizations and 30 million professionals. ANSI members include government agencies, trade associations, standards developing organizations, professional societies, companies, academic and international bodies, and consumer organizations. As the voice of the U.S. standards and conformity assessment system, ANSI empowers its members and constituents to strengthen the U.S. marketplace position in the global economy while helping to assure the safety and health of consumers and the protection of the environment. ANSI is also actively engaged in accreditation – assessing the competence of organizations determining conformance to standards.

Accreditation is a key component of an effective standardization system, assuring industry and governmental decision makers that credentialing organizations are competent and their results can be trusted. ANSI accredits personnel certification bodies to the international standard ANSI/ISO/IEC 17024: *Conformity assessment-requirements for bodies operating certification of persons*. This international standard has also been adopted as an American National Standard (ANS). ANSI also accredits certificate programs based on an American National Standard, ANSI/ASTM/ E2669-18, *Standard Practice for Certificate Programs*. The standard requires that assessment-based certificate programs meet predefined industry requirements for content, criterion-based evaluation of learning outcomes, and feedback for quality improvement. ANSI has accredited over 125 credentialing organizations.

¹ www.ansi.org

Irrespective of the type of credential that is offered (certificate, certification, apprenticeships, degrees, and diplomas); there are certain core elements of a quality, competency-based credentialing process:

- A credential should be empirically based, derived from industry needs, and include a structured process to identify the knowledge, skills, and attributes for a specific job/function.
- All credentials must have a valid assessment process that measures an individual's competencies and assesses their demonstration that s/he has the knowledge and skills necessary for practice.
- The credential should be developed and operated in an overall quality framework with emphasis on continuous improvement.
- Quality credentials also require validation by an independent third party as evidence that the credentialing organization meets established standards.

An independent third-party accreditation is an accountability mechanism to ensure the quality and legitimacy of organizations offering credentials. The ANSI accreditation process based on an international standard (ISO/IEC 17011: 2017, *Conformity assessment -- Requirements for accreditation bodies accrediting conformity assessment bodies*) is extremely rigorous and ensures that only those organizations that meet the stringent requirements under the standard are accredited. ISO/IEC 17011 provides globally-accepted requirements for accreditation bodies. DOL should consider using this standard as a basis for a framework to recognize accreditation bodies for IRAPs. It is important for employers, industry, and job seekers to know that apprentices that have successfully completed an IRAP are competent to perform their tasks and that the programs have a labor market value. This requires an impartial attestation, which can be done by accreditation bodies that are impartial and independent in relation to the IRAPs.

ANSI commends the Department of Labor for its commitment to develop industry-recognized apprenticeship programs to address skill shortages and provide American workers access to good paying jobs.

Respectfully,

Vijay Krishna, Ed.D.

Sr. Director, Credentialing Accreditation Programs

vkrishna@ansi.org; 202-331-3614