

November 19, 2018

Deputy Assistant Secretary Rosemary Lahasky
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

Docket: ETA-2018- 0001

Dear Deputy Assistant Secretary Lahasky,

As the two leading organizations supporting the military and veteran student community, Student Veterans of America and Veterans Education Success appreciate the opportunity to provide comment on the U.S. Department of Labor's (DOL or the Department) information collection request (ICR) titled, *Industry-Recognized Apprenticeship Program Accrediting Entity Information* (OMB Control Number: 1205-0NEW).

Well-designed apprenticeship programs provide a useful opportunity for military-connected individuals to receive necessary hands-on training for successful employment in the civilian workforce. It allows them the opportunity to work with subject matter experts in their field of study and to learn new skills through on-the-job training.

Unlike most other programs of instruction that require approval by State Approving Agencies (SAAs) to offer GI Bill benefits, the Department of Veterans Affairs (VA) allows any program approved by DOL to be automatically eligible for GI Bill benefits. Veterans and their family members who are eligible to receive GI Bill benefits can use their Monthly Housing Allowance (MHA) to offset their lost wages. Therefore, both VA and the military families VA serves are dependent on DOL's choices and require DOL to exercise careful gatekeeping when approving apprenticeship programs.

With that in mind, as the Department is looking to streamline and simplify the IRAP accrediting process, we urge the Department to maintain and enhance common sense quality controls, including strong metrics-based controls, to ensure programs approved for apprenticeships will provide a good return on investment. It is imperative the programs approved will serve as a solid investment of military-connected individuals' hard-earned GI Bill benefits and lead to viable employment within their chosen field. Quality controls provide not only a strong return on investment for those using their GI Bill benefits but also to the American tax payer who trusts their money is being spent wisely to help grow a strong and qualified American workforce.

We stand ready to work with the Department on helping identify common sense quality controls that support a growing workforce.

Sincerely,

Tanya Ang
Vice President
Veterans Education Success

Lauren Augustine
Vice President of Government Relations
Student Veterans of America