

17 February 2025

**JOSE FRANCISCO B. BENITEZ**  
Secretary/Director General  
Technical Education and Skills Development Authority

**RE: Transmission of comments on the Enhanced Draft IRR of RA 12063**

Dear **Director General Benitez**,

Greetings from the Philippine Institute for Development Studies (PIDS)!

Thank you for incorporating our feedback during the consultative meeting with government agencies to gather inputs on the Implementing Rules and Regulations (IRR) of RA 12063 (Enterprise-Based Education and Training [EBET] Framework Act). We are honored to support TESDA in shaping this important legislation.

Noting that our concerns on age, rights of trainees, non-discrimination, and inter-agency/industry board concerns have been included and partially addressed.

I am pleased to transmit our further comments on the enhanced draft IRR sent last 11 February 2025, for your reference and consideration. Please see the attached list.

We appreciate the opportunity to contribute to this process and look forward to the completion of the IRR.

Sincerely,

**ANICETO C. ORBETA JR.**  
President  
Philippine Institute for Development Studies

## **Comments from the Philippine Institute for Development Studies**

- Rule III, Section 6: How do we ensure that the registration process (e.g., procedure, requirements) is not tedious? This has persistently discouraged the conduct of EBT in prior years.
- Rule IV, Section 8: The last two paragraphs still open the possibility that hiring of EBET trainees may be taken advantage of by enterprises. Consider the case of the Dual Training Program (DTP) which has still been persistent despite their supposedly temporary nature as they should transition to the Dual Training System (DTS). Good, even best, performing EBET-implementers should not merit further increase in the cap.
- Rule IX, Section 3: What is the intention of this policy? How can TESDA monitor these unregistered EBET programs and even assess, evaluate, and ensure its efficiency and effectiveness?
- Rule X, Section 4: The periodic assessment of priority occupations every two years is too long and may not reflect the current needs of the labor market. Consider setting it at least once a year.
- The above inquiries can be addressed by the IRR's operational guidelines.