

Congress of the United States
Washington, DC 20515

August 1, 2019

President Donald J. Trump
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear President Trump:

We write to thank you for acknowledging the value of existing registered apprenticeship programs in the construction industry and affirm our support for the exemption for the construction industry in the proposed rule: Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations (1205-AB85). We applaud your efforts to expand apprenticeship programs in industries where they are lacking. In the construction industry, registered apprenticeship programs are widespread and effective. Developing a new parallel training model is unnecessary, duplicative, and could undermine a system that already works.

Over the past 100 years, contractors and the building trades have built a robust apprenticeship system that trains tens of thousands of men and women each year at more than 1,600 locations across the United States. The Department of Labor has frequently and correctly referred to these outstanding programs as the “Gold Standard” of skilled training. These programs are privately funded with over \$1.6 billion each year in collectively bargained contributions. In fact, 48% of all apprenticeships come from the construction DOL-certified joint management and labor administered programs.

The registered apprenticeship system in construction benefits both workers and employers. Workers have the opportunity to start earning good wages while they learn a craft and acquire portable, nationally recognized credentials. Employers get a highly-skilled workforce, improved safety, greater productivity and fewer mistakes.

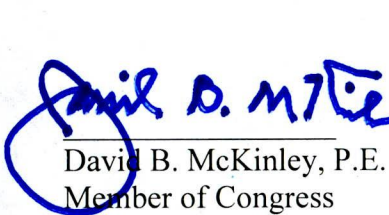
The earn-while-you learn classroom and on-site training system developed in registered apprenticeships in the construction trades should represent a model for other industries to follow. Establishing an untested parallel training system in the construction industry, would result in a confusing network of fragmented standards.

In the proposed rule, the Department of Labor acknowledges the risk of Industry Recognized Apprenticeship Programs potentially harming existing programs as part of their logic for excluding construction. The rule states that “apprenticeship expansion should not come at the cost of existing registered apprenticeship programs.”

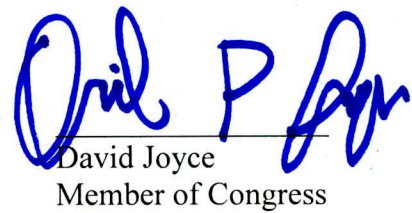
With that risk in mind, we encourage the Department of Labor and the Trump Administration to permanently remove the construction industry from the IRAP initiative. We thank you for your consideration and look forward to working with you as this initiative moves forward.

Sincerely,

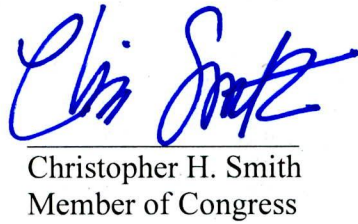
Cc: Patrick Pizzella, Acting Secretary of Labor, U.S. Department of Labor


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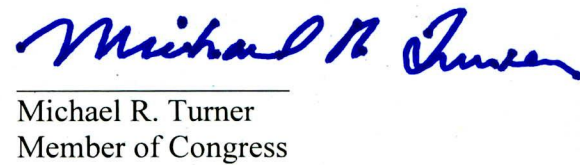

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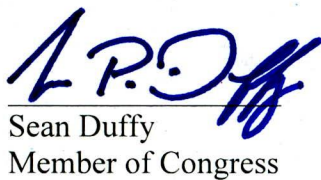

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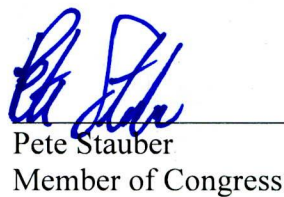

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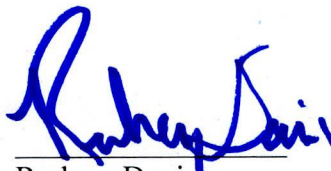

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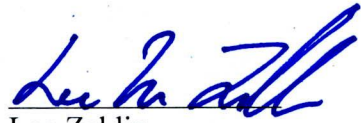

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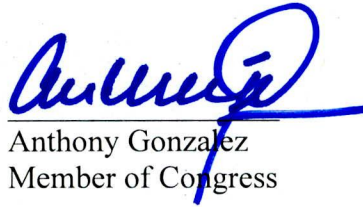
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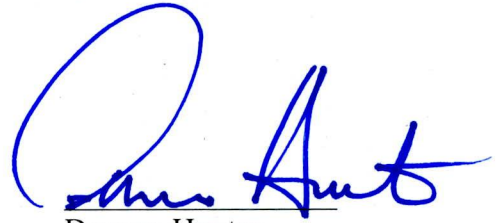
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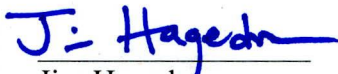
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Cc: Patrick Pizzella, Acting Secretary of Labor, U.S. Department of Labor

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Bill Johnson
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Congress of the United States
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Washington, DC 20515-4801

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