

U.S. Department of Labor proposed new regulations for apprenticeship - “Industry Recognized Apprenticeship Programs” (IRAP)

Summary of Proposed Changes:

The proposed changes to the existing apprenticeship system will eliminate government supervision of apprenticeship and move to industry (company) supervision. This will decimate apprenticeship. If contractors are self-monitoring, who will hold them accountable for quality training standards, safety, and equity? Who will monitor registration, completion and exits? Who will monitor equity?

Challenges with Proposed IRAP System:

- **Under IRAP, Apprenticeships may not have raises or training.**
Under this proposal, contractors will be able to create IRAPs without raises or training.
- **No one to report exploitation to.**
If you are an IRAP “apprentice”, you will not have an entity to go to if you are being exploited – not paid, not given raises, not getting training. If instructors use racist language, or only men get jobs, who do you report to - the company providing your training is also supervising itself. **EEO regs would not apply!**
- **Race to the bottom with wages.**
Currently Federal and State-funded construction projects allow contractors to pay below the Prevailing Wage ONLY IF THEY HAVE A REGISTERED APPRENTICESHIP. IRAPs would allow pretty much all non-union contractors to pay IRAP “apprentices” lower wages which would then undercut contractors with real apprentices and journeylevel workers.
- **Safety**
Construction workers are the 3rd most likely to die on the job in the US. Safety is a huge concern – IRAPs won’t be required to have a ratio of apprentices to journeylevel workers. Nor will they be required to have safety training so you could have disastrous safety consequences if a construction site has a high ratio of unskilled workers. By having sensible ratios of skilled to unskilled workers, as well as significant safety training, apprentices and those around them are kept safe.

What the current system of Registered Apprenticeship Programs (RAPs) Offer:

- **A path to the middle class**
RAPs create a supervised, structured path with a combination of on-the-job training and classroom to create skilled, competent, competitive tradespeople. The rigorous training plus regular raises creates a skilled workforce and ensures an attractive career.
- **Real supervision**
In the current system, apprentices are partnered with experienced journeylevel workers so they are learning day-to-day.

- **Diversity**

In Oregon, due to hard work by union apprenticeships and pre-apprenticeship providers, we have more than double the national percentage of women in the skilled trades apprenticeship programs – 8% compared to the 3% national average. An unregulated apprenticeship IRAP system will turn back the progress we've made on ensuring that quality training and careers are available to ALL citizens.

- **Return on Investment**

The US DOL's own study, "An Effective Assessment and Cost-benefit Analysis of Registered Apprenticeship in 10 States" (Matematica, 2012) makes the case that RAP offers strong return on investment.

- RAP participants had substantially higher earnings than did non-participants, with an average gain in annual earnings of \$6,595 over non-participants, with a range of \$4,451 in Florida and \$15,561 in Maryland (page xv).
- Social benefits are much higher than the costs, by almost \$60,000 (page xiv).
- "For those who complete RA Programs, the estimated average gains over the career are \$240,037 in earnings and \$61,496 in fringe benefits for a total of \$301,533." (page xix)

- **80 years of success**

RAPs have been part of the law for over 80 years. WE get the highest level of training to build our infrastructure and communities. RAPs have allowed workers to develop skills in a well-structured, regulated format, with safety as a major component.

Our current system of registered apprenticeship is working – please consider taking the time to comment by 11:59pm on Monday August 26th 2019

<https://www.federalregister.gov/documents/2019/06/25/2019-13076/apprenticeship-programs-labor-standards-for-registration-amendment-of-regulations#open-comment>