

MESSAGE GUIDANCE

Industry Recognized Apprenticeship Programs (IRAPs)

BACKGROUND

The U.S. Department of Labor (DOL) has released proposed regulations governing a new form of apprenticeship called Industry Recognized Apprenticeship Programs or IRAPs. IRAPs pose a major threat to LIUNA's and other construction unions' Registered Apprenticeship Programs. The difference is simple: Registered Construction Apprenticeships have the highest quality and most stringent safety standards and are the most successful training programs in the history of our country. IRAPs in construction are dangerous and inferior in every aspect.

The proposed rule currently keeps IRAPs out of the construction industry but anti-union contractors and special interests are pushing hard to eliminate that exemption and they are joining forces to coordinate a comment submission campaign to support IRAPs in construction - specifically on prevailing wage projects.

LIUNA's campaign must be bigger! In order to save our training and apprenticeship programs we must flood the U.S. Department of Labor with comments in support of Registered Apprenticeship and a permanent exemption of the construction industry from IRAPs. **LIUNA's goal is to keep the construction industry exempt from the IRAP rule.**

What are IRAPs and how will they hurt us? IRAPs are loosely-regulated programs for industries *without* robust training standards. Recognized Apprenticeship Programs do not require the same quality of instruction, pay scales, or journeyman graduation rates as Registered Apprenticeship Programs. If IRAPs enter the construction industry they will undercut every quality apprenticeship program in the United States, resulting in more work for untrained, unsafe, lower waged apprentices and an increase in work for the non-union sector.

We also have additional concerns about the rule-making process especially around the following particular issues:

- The definition of what comprises construction work in the expansion of IRAPs.
- The impact on Davis Bacon prevailing wage projects.
- The effects on State Apprenticeship Agency (SAA) and State Apprenticeship Council (SAC) states, which are not in the clear.

LIUNA/Union Registered Apprenticeships	IRAPs - Industry Recognized Apprenticeships
<ul style="list-style-type: none"> • Clearly defined criteria for registering a program • Rigorous training and performance standards with oversight by the DOL • Journeymen graduation standards • U.S. recognized certifications and credentials • Pay a living wage and guarantee wage progression • Require safety training • Meet requirements for prevailing wage laws to allow apprentice pay on public works • Require safe, productive apprentice ratios. • Admissions standards comply with anti-discrimination policies and fair hiring practices and take pro-active steps to recruit minority apprentices 	<ul style="list-style-type: none"> • Loosely defined criteria for recognizing a program • Lax training and performance standards with oversight by private entities and no direct DOL oversight. • No graduation or completion requirements • No widespread recognition of certifications or credentials • No requirement for safety training • No wage guarantees • May not (as proposed) be allowed to employ apprentices at less than prevailing rate on public works • No journeyman to apprentice ratio requirements • Must simply abide by current non-discrimination laws and are exempt from the anti-discrimination policies and fair hiring practices

DO's During the 60 Day Comment Period Ending August 26, 2019

- Every card-carrying LIUNA member should send a comment to the U.S. Department of Labor with the message that construction should not be part of the IRAPs - ever.
- Every Contractor, Employer Trustee, JATC member and Association should send a comment against IRAPs in the construction sector and urge a permanent exemption for the industry.
- All messages should be different. Form letters will not be accepted. We have set up a platform for you to easily create unique comments based on a few personal details.

Send a message online quickly and easily at one of the following websites:

- LIUNAREpsComments.org (LIUNA Leaders and Reps)
- LIUNAMemberComments.org (Members and Retirees)
- LIUNATrainingComments.org (Apprentices and Trainees)
- LIUNACContractorComments.org (Contractors)

Don'ts

- Don't make this an attack on Trump period. Keep it focused on the issue.
- Don't make this about the full rule or IRAPs generally. The vast majority of this rule is about establishing IRAPs in other industries. Our only concern is asking the Department of Labor to keep the construction exemption from IRAPs in the final rule.
- Don't mistake the fact that the draft rule has an exemption for construction. The door is purposefully open to remove it from the final rule. Anti-union lobbyists are working right now to remove it. We need to target our comments to keep construction exempt from IRAPs.

Key Talking Points for ALL Groups

- No IRAPs in Construction. The use of Industry Recognized Apprenticeship Programs in construction is unnecessary. The Building trades unions and their contractor partners spend \$1.6 billion every year building the best trained workforce in the world.
- Registered Apprenticeship has set the standard for quality for over 80 years and counting – annually graduating hundreds of thousands of men, women, minorities, youth and veterans without cost to the government. Don't break what isn't broken.
- IRAPs have lower wage and safety standards, less oversight, quality, and less opportunity for construction workers.

Messages for Members

- IRAPs don't belong in the construction industry.
- LIUNA and the Building Trades already have a successful apprenticeship program and IRAPs would lower wages and threaten worker safety.
- These registered apprenticeships have helped millions of Americans build careers in construction with programs that help workers learn skills that lead to higher wages, provide life-long learning opportunities, ensure versatility and advance into leadership positions.
- IRAPs would increase the use of unskilled and inexperienced workers and allow employers to pay apprentices minimum wage rather than union apprentice scale.
- IRAPs threaten the livelihoods of LIUNA members and could turn a pathway to the middle-class into a path to poverty.
- The Department of Labor is considering the use of IRAPs in other industries right now. Tell the Department of Labor to keep IRAPs out of the construction industry by sending a comment.
- LIUNA members and retirees can comment at: LIUNAMemberComments.org and LIUNA apprentices and trainees can go to: LIUNATrainingComments.org.

Messages for Elected Officials

- LIUNA takes pride in our training programs, including independent third-party, internationally accredited curriculum and instructor & apprenticeship coordinator certification. Our programs are tested, and proven true to produce highly skilled craft professionals. With IRAPs in construction, non-union contractors would hand out certifications without the rigorous training standards that we have.
- Unlike registered apprenticeship programs, there are no universally respected criteria in place to evaluate the skills or shortcomings of credentials issued under the IRAP system. This dilutes the strength of certifications.
- Registered apprenticeship programs are the best way to prepare for a career in the construction industry. LIUNA's apprentices receive hands-on training and classroom instruction, all made available by employers and labor working together. Subject matter experts working in the field and contractors who perform make our program strong.
- IRAPs, designed for industries other than construction, will not produce a skilled and safe workforce, life-long learning and will not produce a living wage. These loosened standards have no place in the construction industry.
- IRAPs will not only threaten our quality training programs, it will negatively affect contractors and put LIUNA jobs at risk.
- Stringent safety standards are essential in the construction industry to protect the public, workers and their families. The best way to ensure public safety and a safe workplace is to continuously train on the proper precautions, equipment, and first-aid treatment over the course of a registered apprenticeship program.
- Please submit comments to urge the Administration to make the construction carve-out permanent. Also, please place a call into the White House to express the importance of making the construction carve-out permanent. Construction should not be part of IRAPs.

Messages for Employers

- IRAPs will let non-union contractors use IRAPs to undercut bids and favor unqualified, low bidders.
- IRAPs would increase liability insurance and encourage the use of unskilled and inexperienced workers while creating a revolving door workforce.
- IRAPs would allow the proliferation of unaccredited sham construction training programs.
- LIUNA's registered apprenticeships help employee retention rates and help employers fill current or predicted skills shortages.
- Registered Apprenticeships also enhance productivity, reduce absenteeism and improve employee relations.
- Through registered apprenticeship programs, employers are able to access workers with customized skills and save money on wages and recruitment.