

August 20, 2019

Patrick Pizzella
Acting Secretary of Labor
United States Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Dear Acting Secretary Pizzella:

On behalf of the Interior Finish Contractors Association (IFCA), a trade association representing signatory finishing contractors in the Greater Philadelphia Area, we are writing to you today requesting the Department of Labor permanently exempt the construction industry from the Industry Recognized Apprenticeship Programs (IRAP).

The Interior Finish Contractors Association (IFCA) was founded in 1968 by the principal union finishing contractors in the Philadelphia and Southern New Jersey Trade Area. IFCA was created to be the voice of leadership in the construction industry by pursuing best practices and policies beneficial to union contractors in the Philadelphia region and its surrounding counties. We represent the interests of a great deal of contractors who hire hundreds of union members and thousands more who are dependents and beneficiaries of those union members.

The June 25, 2019 DOL proposed rule that would shift the jurisdiction to accept or reject apprenticeship programs from a federal agency to Standards Recognition Entities (SREs) currently contains an exemption for the construction industry. We ask that this exemption be made permanent to preserve the integrity of proven and successful apprenticeship programs which also protects the safety of the workers. Including construction in IRAP would pose a significant safety risk to workers and increase the liability of construction contractors in general.

Our local International Union of Painters and Allied Trades District Council 21 (District Council 21), Keystone + Mountain + Lakes Regional Council of Carpenters (KML Carpenters) and Laborers' District Council (LDC) four year apprenticeship programs are designed to thoroughly develop the talents and skills of up-and-coming apprentices. The programs are a combination of classroom learning and job site employment; a system designed to accommodate the needs of contractors and apprentices alike. As a result, apprentices are continuously building upon their knowledge and skill base while solidifying these lessons in a practical job site setting. These programs also allow apprentices to earn wages and benefits that enable them to provide for themselves and their families while learning from the most experienced professionals both in the classroom and on-site. Apprentices work hard to graduate and obtain journey-level status and are proud that part of their hourly wages pay for future training of apprentices.

Any change to the current construction industry exemption would undermine a privately funded system that has proven to be successful, safe, and reliable for many generations of skilled workers. Our local

KML Carpenters' yearly budget for their school year is over \$7 million and in May of 2019 graduated 233 individuals over the five trades. This is just one budget; you can imagine the amount of money spent collectively by everyone involved in union apprenticeships throughout the United States.

Our local trade unions offer "state-of-the-art" training centers. The KML Carpenters currently have 962 apprentices enrolled in the program and in the last 5 years, a total of 736 trainees have graduated and entered the workforce. Our retention rate in those 5 years is an average of 95%, meaning nearly all these workers have remained employed within the industry. Additionally, the 10 year average is roughly 90% which indicates our programs maintained strong employment through the recession. District Council 21's Finishing Trades Institute of the Mid-Atlantic Region offers a program that embraces an atmosphere to create a highly skilled, educated and safe workforce guided by progression and innovation; they've got an 86% completion rate. And of course, the LDC has an apprenticeship program that produces skilled workers. Locally and across the United States, apprentices that graduate from our four year programs have a huge impact in the communities that they work and live in.

The construction industry is dangerous, and safety is the number one priority of both our contractors and labor partners. Registered apprenticeship programs ensure our workers are held to uniformed training and safety standards which lead to a much safer jobsite. These high standards and the rigorous curriculum have been designed over the years by industry experts with oversight from relevant federal agencies and are considered the gold standard.

In conclusion, IFCA is strongly opposed to including the construction industry in the DOL's proposed IRAP regulations. Registered Apprenticeship Programs related to the construction industry should not be changed to allow employers the ability to create sub-standard programs. Oversight of construction apprentice programs should be maintained to ensure proper journey person to apprentice ratios and to ensure that uniform training methods are established and maintained. The exemption for the construction industry must be made permanent.

Sincerely,

Kimberly A. Clerkin

Kimberly A. Clerkin
Executive Director