



Proposed IRAP Rules

By Scott Spratt of SMART Local 60

THE FUTURE of America's construction workers and the integrity of our industry is at risk. A new proposal by the U.S. Department of Labor (DOL) could drive down training and labor standards in construction registered apprenticeship programs and set off a race to the bottom throughout our industry. And we have a month to stop it.

- In June, the DOL proposed regulations to implement Industry-Recognized Apprenticeship Programs (IRAPs). Unlike the Registered Apprenticeship model, the IRAPs puts the fox in charge of the henhouse. The new IRAP system will give private organizations, such as employers and trade associations, free rein to create new watered-down standards and certify subpar apprenticeship programs.
- While we applaud the government's interest in expanding apprenticeship opportunities in new industries, IRAPs have no place in construction.
- The proposed IRAP regulations provide a temporary exemption for the construction industry. But this could change when the DOL issues the final version of the regulation. We need to make sure that when the final regulations come out, the construction industry exclusion is permanent.
- The construction industry is, by its very nature, among the most dangerous industries. Workers perform difficult physical labor and are often exposed to extreme temperatures, heavy machinery, and toxic substances. To guard against industry's inherent dangers and promote first-rate work, workers must receive the highest quality education and training. For over 80 years, Registered Apprenticeship Programs have provided just that.
- The public is also at risk. Having the safest roads, bridges, schools, and utilities, requires the best trained workers with the highest level of skill. Anything less, especially an untested program with lowered training standards will put public safety at risk.
- The proposed IRAPs differ significantly from Registered Apprenticeship Programs. Construction registered programs help recruit, train and retain workers through progressive wage increases; apprentice-to-journeyworker ratios that promote safety; quality assurance assessments by the government; uniform standards; mandatory safety training; instructor eligibility requirements; and transparency requirements. The proposed IRAP regulations abandon the important protections of the registered model and give employers license to implement whatever low-road standards they see fit.
- Second-rate IRAP certifications would undermine the gold-standard that the Registered Apprenticeship Programs have attained. IRAPs in construction would jeopardize both the quality of construction and the safety and security of the construction workforce, weakening every community across the country where these workers reside and are needed.

HOW TO HELP: Submit a comment to the DOL. We have until August 26, 2019 to make our voices heard before the Department of Labor issues the final regulations. Visit <http://saveconstructionapprenticeships.org/#/34/> to submit your comments.