



International Union of Operating Engineers

AFFILIATED WITH THE AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS

MEMORANDUM

July 18, 2019

JAMES T. CALLAHAN
GENERAL PRESIDENT

To: All U.S. Business Managers

From: James T. Callahan, General President

RE: Industry Recognized Apprenticeship Program Campaign

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The Department of Labor (DOL) recently released their long awaited proposed rule to expand apprenticeship programs in the U.S. through an Industry Recognized Apprenticeship Program (IRAP). The regulation creates a parallel track of apprenticeship that no longer has to go through the process of registering and maintaining accountability to the Department of Labor's Office of Apprenticeship or a State Apprenticeship Council. The current proposal excludes construction, and does not allow the parallel system to exist in the sector. But we need to make sure the exclusion stays in place in the final version of the rule.

Unscrupulous contractors have been using apprenticeship as a way to evade federal and state prevailing-wage laws for years. They lie about whether an apprentice is actually registered. It's the only way a worker on a public-works project can be paid *less than* the prevailing wage. If this rule allows IRAPs into construction, there will be a massive hole blown in prevailing-wage laws. We cannot allow this back-door attack on prevailing wages and apprenticeship.

The IUOE invests over \$180 million in training each year. IUOE Local Unions sponsor 100 apprenticeship and training programs at 127 training sites. If construction were to be included in industry programs, it would allow greedy, anti-union contractors to destroy our apprenticeship programs by lowering our standards, cutting corners, and boosting their profits on the backs of their workers. The anti-union ABC is aggressively lobbying to include construction in the final version of the rule. Unfortunately, the Associated General Contractors adopted the same position: <https://www.agc.org/news/2019/06/24/contractors-need-not-apply-administration's-new-apprenticeship-proposal-fails>

We need your assistance in mobilizing your members to submit comments to the DOL by August 26, 2019. Urge the DOL to keep the exclusion for construction in the industry-recognized apprenticeship program final rule.

