



October 24, 2023

The Honorable Pat Fallon
Chairman House Oversight
Subcommittee on Economic Growth,
Energy Policy, and Regulatory Affairs
2157 Rayburn House Office Building
Washington, DC 20515

The Honorable Cori Bush
Ranking Member House Oversight
Subcommittee on Economic Growth,
Energy Policy, and Regulatory Affairs
2157 Rayburn House Office Building
Washington, D.C. 20515

Dear Chair Fallon and Ranking Member Bush:

On behalf of the membership of the Signatory Wall and Ceiling Contractors Alliance (SWACCA), we write to offer our views for tomorrow's House Oversight Subcommittee on Economic Growth, Energy Policy, and Regulatory Affairs hearing entitled, *"The Power of Apprenticeships: Faster, Better Paths to Prosperous Jobs and Less Waste in Higher Education."*

SWACCA is a national alliance of wall and ceiling contractors committed to working in partnership with their workers and customers to provide the highest-quality, most efficient construction services. SWACCA contractors provide high-quality and cost-effective construction services to their customers and well-paying, middle-class jobs to their employees. This is possible because of the superior skill and efficiency of our workforce that begins with the training our workers receive through high-quality registered apprenticeship programs.

SWACCA's membership includes more than 350 construction employers that participate in registered apprenticeship programs located across the country and covering thousands of registered apprentices. SWACCA members rely on these programs to train their collective workforce. Our members invest millions of dollars in these programs every year because they are a proven means to meet our talent development needs. We take pride in maintaining these programs without taxpayer assistance. Many managers and executives at SWACCA member companies (and even some company owners) began their construction industry careers in these apprenticeship programs.

Given SWACCA's historic support for these well-functioning, established registered apprenticeship programs, we write to express our concern about any legislative efforts to resurrect Industry-Recognized Apprenticeship Programs (IRAPs). We believe the Department of Labor did the right thing by rescinding the IRAP regulations in September 2022 out of concern that they offer inferior training and protections for apprentices. We agree that IRAPs could serve as a vehicle for reducing worker training to minimum requirements. In the absence of meaningful government oversight and enforceable standards, and without a commitment to substantial private investment,

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we do not believe IRAPs will result in the progressive development of skills over time akin to a registered apprenticeship program. Simply put, IRAPs are unlikely to empower workers to climb a career ladder to economic security and self-sufficiency. Moreover, in industries like construction, introduction of IRAPs would undermine the significant private investments made over decades by SWACCA members and other employers to ensure a high-quality workforce.

As Congress continues to evaluate ways to improve workforce development, we hope the discussion will reflect the bipartisan consensus reached during the Trump Administration that IRAPs have no place in the construction industry as evidenced by the construction exemption in the Trump Administrations IRAP final rule published in March 2020. That final rule exempted the construction industry from IRAPs because, as Trump policymakers acknowledged, their goal in establishing IRAPs was to “expand apprenticeships to *new* industry sectors and occupations [and] industries where apprenticeships are emerging or underutilized.” The Trump Administration agreed with a substantial, bipartisan group in Congress that there was “no reason to take the risk,” of disrupting the registered programs in the construction industry that everyone agreed are well-established and well-functioning.

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The construction industry has achieved tremendous success through registered apprenticeship programs. They are a proven model from which other industries want and need to learn. As Congress continues discussing improvements to apprenticeship programs, we suggest that the focus should be on expanding access to high-quality, proven registered apprenticeship programs rather than untested experiments to weaken them through the establishment of IRAPs or similar unproven methods.

Thank you in advance for your attention to our views.

Sincerely,



Robert Klugh
President