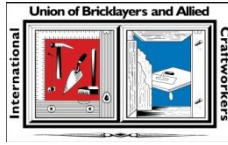


International Union of
Bricklayers & Allied Craftworkers
620 F Street NW, Washington DC 20004 - Phone (202) 783-3788



MEMORANDUM

TO: BAC US Principal Officers
FROM: James Boland, President
DATE: July 11, 2019
SUBJECT: We Need To Take Action to Defend Real Apprenticeships

Our apprenticeship system is under attack, and we need your help.

Our JATCs have developed and nurtured the workforce that has built America for over a century. Most of you are products of BAC-sponsored JATCs. As tradespeople, and as union leaders, you know better than anyone just how vital to the future of the trowel trades our training programs are. They're tested, they're proven, and they're *regulated* to make sure they do their jobs – as Registered Apprenticeship programs, they're subject to the stringent standards and oversight of the U.S. Department of Labor's Office of Apprenticeship or recognized State agencies.

But today, our apprenticeship programs, and the entire system of joint labor-management training in the construction industry, are in peril – not because of any issues with their performance, but thanks to lobbying from the ABC and the worst bottom-feeders plaguing construction.

On July 25, the Trump Administration published a proposed rule to create Industry Recognized Apprenticeship Programs (IRAPs). In short, IRAPs are intended to bring a semblance of apprenticeship to industries where Registered Apprenticeships have either never been in place, or haven't been effective. The idea behind IRAPs is to allow "industry-leading organizations," rather than the DOL or state labor departments, to oversee apprenticeship programs in certain industries.

Fortunately, the proposed rule indicates that the construction industry will be "initially" exempt from the IRAP system because our Registered Apprenticeship programs have been so successful. After all, the construction industry accounts for around half of the nation's apprentices, even though construction workers make up less than 4% of the nation's workforce. Our apprenticeship system *works*. We don't need IRAPs, and so we were pleased to see that construction is not included in this "initial" IRAP concept.

But the temporary exemption promised in the proposed rule is not good enough.

Unless construction is more clearly carved out of the IRAP rule, we will constantly be defending our industry from the low-road contractors who can't wait to use bogus apprenticeship programs to undercut prevailing wage laws and create an unskilled, dependent, and subservient workforce. And we know that anti-union interest groups will be submitting comments to DOL concerning the rule to try and expand IRAPs to construction.

We need to take action – we need to make sure BAC's voice is heard.

It's essential that we talk with our members and ensure that as many of them as possible submit comments supporting real Registered Apprenticeship in construction. To that end, we have worked with NABTU on an electronic tool to make it easy for members to provide the Department of Labor with official comments on the proposed rule. If you go to savebacapprenticeships.org, you'll see just how simple it is to add your voice to the fight against IRAPs.

We have also compiled a Digital Tool Kit with materials about IRAPs. It is available for all BAC US Principal Officers after you log in. The tool kit has sample letters, talking points, social media tool kit, and more.

Comments are due on August 26, and we're aiming to mobilize at least 2,000 comments from BAC members. If we're going to hit the goal, we need your help. Every time you or one of your agents speaks with a member during July and August, please consider showing them savebacapprenticeships.org and asking them to take 30 seconds to support their union and real apprenticeships.

Please don't hesitate to speak with your Regional Director if you have any questions. Working together, we can beat back the attack on apprenticeship and support our JATCs.

Visit

**savebacapprenticeships.org
to defend real trowel trades apprenticeships.**