



North America's Building Trades Unions

June 12, 2019

Dear Member of Congress:

Sean McGarvey
President

On behalf of the over 3 million skilled craft professionals that comprise North America's Building Trades Unions (NABTU), I urge your opposition to Amendment #38 offered by Representative French Hill to H.R. 2740, the Labor, Health and Human Services, Education, Legislative Branch, Defense, State, Foreign Operations, and Energy and Water Development Appropriations Act, 2020.

Brent Booker
Secretary Treasurer

Newton B. Jones
Boilermakers

North America's Building Trades Unions' world-class apprenticeship programs train workers to become highly-skilled construction workers through a debt-free, technologically-advanced education. Together, the Building Trades and partner contractors invest over \$1.6 billion annually in apprenticeship and journey-level training at more than 1,600 training centers in the United States. If this system were a college or university, it would be the largest degree-granting college or university in the United States – over five times larger than Arizona State University.

Kinsey M. Robinson
Roofers

James P. Hoffa
Teamsters

Terry O'Sullivan
LiUNA

James Boland
Bricklayers and Allied Craftworkers

NABTU is gravely concerned that Amendment #38 would allow unregistered apprenticeship programs, as well as unproven and untested industry-recognized apprenticeship programs (IRAPs), to access public dollars, which would significantly undermine the registered apprenticeship system. Under the registered apprenticeship system, our programs must meet regulatory requirements including apprentice wage and working conditions, program length, and EEO requirements.

Frank Christensen
Elevator Constructors

Kenneth E. Rigmaiden
Painters and Allied Trades

IRAPs, as a proposal, were born out of Executive Order 13801, where they were examined by a task force appointed by the president. As of the time of consideration of this Amendment, that process has not yet been completed via the formal rulemaking process. As such, Congress should not be tipping the scales with scarce public resources until such time as there has been a thorough, substantive, and legal vetting process. What we do know of IRAPs is disturbing, and will do nothing to advance the economics of individual workers or meet the demands of competitive industries.

James T. Callahan
Operating Engineers

Joseph Sellers, Jr.
SMART

Lonnie Stephenson
IBEW

Eric M. Dean
Ironworkers

IRAPs will enable the rise of multiple private accreditors with overlapping jurisdictions and competing standards, and provide no clear mechanism for holding accreditors or programs accountable for poor outcomes. Most concerning, IRAPs would not be required to pay graduated wages as found in the registered system and would only require federal, state or local minimum wages, or in some cases only stipends that could even be below minimum wage, undercutting the Davis-Bacon Act, which has ensured family-sustaining wages for construction workers for generations.

James P. McCourt
Insulators

Daniel E. Stepano
Plasterers' and Cement Masons'

Mark McManus
UA

IRAPs weaken protections for apprentices and threaten confidence in a proven system that has existed for decades. As such, I strongly urge you to OPPOSE Hill Amendment #38 to H.R. 2740.

Sincerely,

Sean McGarvey
President

Value on Display. EVERY DAY.