

This is an urgent message. Please read the information below and get this in the hands of every member—apprentice, journeyworker or retiree (mailings, meetings, social media etc.) —and encourage them to take action. The Industry-Recognized Apprenticeship Program (IRAP) would be detrimental to all of our members, contractors, and our industry.

Below is background information and a link to our site (saverooftersapprenticeships.org), which will help users automatically send a prepared comment to the DOL via smartphone, tablet or computer. This site is for our members and it takes less than two minutes to complete. We will be sending out another site for our employers to submit comments as soon as it is available.

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. 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 (example: non-union), 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, heights, heavy machinery, hazardous 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 and training. 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.

Roofers comment page.: <http://saveroofersapprenticeships.org>

I cannot stress enough how important this is for all of us to follow through.
We are up against active, well-funded opposition, and we need to generate a large volume of comments in order to save our exemption. This email will be sent out numerous times until the end of the comment period and please see the attached one page flyer and additional info about the site.