

**United States Department of Labor
Employment and Training Administration**

**In re: Apprenticeship Programs, Labor Standards
for Registration, Amendment of Regulations**

RIN-1205-AB85

Comments of the Columbus Sheet Metal Workers Apprenticeship

The Columbus Sheetmetal Workers Apprenticeship (“Apprenticeship”) is a Registered Apprenticeship program registered with the Ohio State Apprenticeship Council. The Apprenticeship has been so registered since 1941 over 78 years. It is operated jointly by labor and management Trustees. It currently has 127 Apprentices enrolled. In 2019, it graduated 22 Sheet Metal Journeyman and Journeywomen.

The Apprenticeship, as a Registered Apprenticeship, has a long and successful history and has established many characteristics to successfully train Apprentices and Journey People. The Apprenticeship, through its high-quality training program, empowers its Apprentices to have successful, safe, and fulfilling careers in good, middle-class jobs.

The Apprenticeship utilizes a rigorous curriculum designed to meet government-approved standards through the State Registration process. The Apprenticeship has worked hard over time to establish a program with an appropriate balance between classroom and on-the-job training. There is significant and extensive safety training incorporated into the program. Safety elements of the Apprenticeship’s program include multiple safety courses and structured Apprentice-to-Journey-worker ratios to ensure proper supervision, good training, and safe working conditions.

The Apprenticeship’s program includes a structured wage progression to reward Apprentices as they progress through the program. Apprentices are evaluated regularly to ensure adequate progression. The program contains and adheres to strict EEO requirements which protect Apprentices from discrimination and harassment. Apprentices are protected from arbitrary

termination from the program after a probationary period. The Apprenticeship maintains specific qualifications for its instructors.

The success of the Apprenticeship as a Registered Apprenticeship is consistent and continual. Within the past five years, the Apprenticeship graduated a Journeyman who, at the time of entrance into the program, was homeless and living out of his car. Four years after graduation from the Apprenticeship as a Sheetmetal Journeyman, this individual is succeeding with the training provided by the Apprenticeship and has a quality middle-class job.

The Apprenticeship works hard on community engagement with women and individuals who had historically faced barriers against entry into the construction industry. Within the past several years, the Apprenticeship graduated a female Sheetmetal Journeywomen who has become an instructor and a positive female role model for the construction industry at a local area career center, as the welding instructor.

The long and storied success of the Apprenticeship demonstrates why the Department of Labor must permanently exclude the construction industry from its new system. Permitting a parallel, non-registered apprenticeship system in the form of Industry Recognized Apprenticeship Programs (“IRAPs”) would undermine the existing Registered Apprenticeship system by watering down the strengths of the Registered Apprenticeship programs that have proven so successful. Protections afforded by Registered Apprenticeship that could be undermined, reduced or eliminated include, but are not limited to, safety protections and equal employment protections.

Construction can be a dangerous industry which demands high quality work from highly skilled and appropriately trained workers. The Registered Apprenticeship system equips workers for a long-term career in the industry while enabling them to earn good wages while they learn. The IRAP system would offer construction employers a cheap alternative mechanism for securing

apprentices which would not provide for the same safety protections, protections from harassment and discrimination, or quality of curriculum and training. Further, apprentices could be minimum wage workers without the same incentives for progression.

Not only could the IRAP system undermine safety, protections and opportunities for women and minorities, there would not be protection for America's veterans. IRAP programs would not qualify for the same VA benefits our veteran apprentices now enjoy. Encouraging employers to turn away from the Registered Apprenticeship system would come at the expense of workers, who would not be guaranteed the same quality training or wage progression, and the industry at large. The construction industry needs a highly-skilled and safe workforce, and IRAP programs are unnecessary because the industry has a long and successful history of quality Registered Apprenticeship programs.

There is simply no need to apply a formula to determine if the construction industry should be excluded from the IRAP system. There is a seventy-year proven track record of construction industry Registered Apprenticeship programs. No more data is required.

The Columbus Sheetmetal Workers Apprenticeship respectfully requests that the Department of Labor drop the proposed formula and permanently exclude the construction industry from the IRAP system.

Respectfully submitted,

Board of Trustees

Trustees: *Rodney French, Jeff Rowe, Cameron Saunders
Anthony Staten, Jim Williams, Ronald Wilburn*