



Join the Fight to Stop Industry Recognized Apprenticeship Programs (IRAPs) from Destroying Union Construction

The U.S. Department of Labor (DOL) is requesting comment on a proposed rule creating Industry Recognized Apprenticeship Systems (IRAPs). IRAPs would run parallel to our effective, gold-standard registered apprenticeship programs and pose a serious threat to the union masonry industry.

We need your help to let the DOL know that IRAPs have no place in construction, and we must act fast: the comment period closes in less than a month on August 26, 2019.

IMI staff are available to help you draft a persuasive comment in the critical fight against IRAPs. Simply [contact us](#) for assistance.

Please read our FAQ below for more information on how IRAPs would put our industry, and your company, in peril.

What Entities Certify IRAPs?

IRAPs are not recognized by federal or state agencies like registered programs, but by **Standards Recognition Entities (SREs), operating with vast discretion and little oversight**. SREs would be approved by DOL staff and contractors from the industry (without explanation of how the outside contractors will be selected). If SREs are permitted to recognize construction programs, the standards and training programs could vary widely in the same trades.

Who Supports IRAPs?

The Associated Builders and Contractors (ABC), Associated General Contractors (AGC), and low-road contractors are pushing hard for construction to be included in the IRAP rules.

How Do IRAPs Undercut Registered Apprenticeship Programs?

Allowing multiple organizations to recognize apprenticeships with their own unique standards for the same trades would create confusion. Moreover, **they would allow organizations that have avoided establishing and paying for top-notch training programs under the current rules to game the system and get public funding for programs that are less effective and less safe than the ones we have been successfully providing privately for a century.**

Could IRAPs Jeopardize My Company's Ability to Win Prevailing Wage Projects?

Yes. IRAPs, unlike registered apprenticeships, **do not have requirements for wage and skill progression or apprentice to journeyman ratios, and only require that the applicable minimum wage be paid**. Because of this, **they would undercut the level playing field on prevailing wage projects.**



Isn't the Construction Industry Exempt Under the Proposed Rule?

The proposed rule currently includes an exemption for the construction industry from the IRAP programs. However, the DOL is requesting comment on whether there should be a construction exemption at all, and if such an exemption should be temporary. **We need to encourage the DOL to make the construction industry permanently exempt from IRAPs under the final regulation in the text of the regulation.**