



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS.**

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June 26, 2019

VIA EMAIL

To: All IBEW Local Union Business Managers in the United States

RE: Department of Labor Apprenticeship Proposal

Dear Sisters and Brothers:

On Tuesday June 25, 2019, the Department of Labor (DOL) released a proposal designed to expand apprenticeship opportunities in the United States. If made final, the proposal would establish a process for creation of "Standards Recognition Entities" (SREs) that would themselves recognize a new classification of apprenticeship programs, "Industry-Recognized Apprenticeship Programs" (IRAPs). Very simply put, this would allow non-union contractors to become SREs and self-certify their own "apprenticeship programs." IRAPs would not be subject to requirements that our apprenticeship programs and other DOL registered apprenticeship programs are.

The IBEW believes this is extremely problematic and would result in large quantities of "apprentices" being trained by inadequate programs. In addition, it is possible IRAPs would be a way of undermining prevailing wage. The process of self-certification and IRAPs generally have no place in our industries. In the proposal released yesterday, the construction industry is "at least initially" exempted from the proposal.

While it does appear the construction industry is currently exempted from the proposal, it is necessary for the IBEW and its partners to speak up to ensure we remain exempted – permanently. I ask that each local union business manager, regardless of classification(s) represented, take the time to submit feedback to the DOL on its proposal. The IBEW is working to develop a web-based system that will make providing this feedback as easy as possible.

Over the next few weeks you will be hearing from this office, your international vice president, and international representative(s), about this important initiative. I thank you in advance for your full participation and cooperation. In the meantime, please email ApprenticeshipRegulation@ibew.org with any questions or concerns.

With best wishes, I am

Fraternally yours,

Lonnie R. Stephenson
International President

LRS:cbj

Copy to All International Vice Presidents in the United States
All Executive Assistants

