



August 26, 2019

Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for DOL-ETA
Office of Management and Budget
Room 10235
725 17th Street NW
Washington, DC 20503
Email: OIRA_submission@omb.eop.gov

RE: REGULATORY INFORMATION NUMBER (RIN): 1205-AB85

ATTN: OMB Desk Officer for DOL-ETA

NCCER is a not-for-profit 501(c)(3) education foundation created in 1996 as The National Center for Construction Education and Research. It was developed with the support of more than 125 construction CEOs and various association and academic leaders who united to revolutionize training for the construction industry. Sharing the common goal of developing a safe and productive workforce, a standardized training and credentialing program was created for the industry. This progressive program has evolved into curricula for more than 70 craft areas and a complete series of assessments offered in over 4,000 NCCER-accredited training and assessment locations across the United States.

These programs reach over 500,000 individuals annually and are utilized by secondary programs, colleges, contractors, government programs and association partners like Associated General Contractors (AGC) and Associated Builders and Contractors (ABC).

NCCER's Construction Workforce Development System includes:

- Career awareness and recruiting through our industry leading Build Your Future Initiative (www.byf.org)
- Instructor training and certification
- Training program accreditation (and auditing to ensure quality)
- World Class Curriculum Development and Maintenance – 70 individual craft titles (most aligning to Office of Apprenticeship Training standards)
- Skill assessment & certification program for journeymen
- Industry-recognized credentials and certifications
- Global registry system for recording credentials and certifications

All NCCER accredited training sponsors operate competency-based apprenticeship-style programs or what is now being called "Industry Recognized Apprenticeship Programs" and a small percentage also operate programs under the registered apprenticeship system using the same NCCER resources and material.

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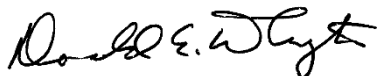
As you might expect, NCCER is disappointed that the current proposed rule excludes the construction industry. We believe that the rationale cited for this exclusion is flawed and based more on political pressure than on sound reasoning and judgement. Our concerns are outlined below:

- 1) NCCER reaches as many or more individuals on an annual basis with its standardized training and credentialing system for construction than are enrolled in the entire registered apprenticeship system across all industries. With over 700 accredited training sponsors serving more than 4,000 locations, we have a critical mass and infrastructure that is widespread domestically and growing internationally.
- 2) NCCER is a model Standards Recognition Entity (SRE). The construction workforce development system that we have developed and worked to perfect over the last 23 years is completely in line with the requirements of SREs as outlined in the rule. As mentioned above, we currently have a sponsor network of more than 4,000 training and assessment locations across the United States. All of these would likely be eligible to become Industry Recognized Apprenticeship Programs if construction were not excluded, potentially adding hundreds of thousands of individuals to the apprenticeship rolls.
- 3) Our estimates are that the U.S. construction industry needs an additional 1.4 million skilled craft professionals in the short term. The proposed rule speaks often of the "Skills Gap." In no industry is the skills gap more pressing and critical than it is in construction. We have seen these shortages evolving for years. If existing registered construction apprenticeship alone was enough (where registered apprenticeship is highest among all industries) then we would have made more progress toward closing the skills gap in our industry.

Given our three concerns above, and even if construction had been included, the proposed rule provides no incentive for existing high-quality training programs to become Industry Recognized Apprenticeship Programs.

Thank you in advance for considering our comments.

Sincerely,



Don Whyte
Chief Executive Officer



Boyd Worsham
President