



August 26, 2019

Adele Gagliardi
Administrator, Office of Policy Development and Research
U.S. Department of Labor
200 Constitution Avenue, NW
Room N-5641
Washington, DC 20210

RE: RIN 1205-AB85

Dear Ms. Gagliardi:

The National Roofing Contractors Association (NRCA) wishes to provide comments regarding the Department of Labor's Notice of Proposed Rulemaking entitled "Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations" as published on June 25, 2019. The NPRM would establish new Industry-Recognized Apprenticeship Programs (IRAPs) as a strategy for addressing the nation's skills gap and enabling employers to meet their workforce needs.

Established in 1886, NRCA is one of the nation's oldest trade associations and the voice of roofing professionals worldwide. NRCA's nearly 4,000 member companies represent all segments of the industry, including contractors, manufacturers, distributors, consultants and other employers in all 50 states. NRCA members are typically small, privately held companies with the average member employing 45 people and attaining sales of \$4.5 million per year.

NRCA appreciates the Department's proposal to provide employers with a new option for more streamlined and flexible apprenticeships to help them meet future workforce development needs. However, we are concerned the NPRM in its current form would deprive the roofing industry from participating in the new IRAPs due to the decision to exclude the construction industry from the program, thus limiting educational opportunities for American workers.

NRCA welcomed President Trump's 2017 Executive Order directing the Department to expand and streamline apprenticeship programs because bold action is needed to address the workforce shortage problem that has reached crisis proportions within the roofing industry. Despite providing numerous opportunities for family-sustaining jobs for American workers (the mean hourly wage for roofing workers was \$21.09 in 2018 according to the Bureau of Labor Statistics), our members indicate that a persistent lack of qualified candidates for job openings is the largest limiting factor in growing their businesses. NRCA members consistently report they could be doing at least 10 to 20 percent more work if they could find the necessary workers, which translates to an estimated \$7.5 to \$15 billion in lost economic activity annually. The problem of chronic workforce shortages in the roofing industry is expected to become even more acute in the coming years given the industry's aging workforce and other demographic trends.

To help our members address chronic workforce shortages, NRCA is now implementing a new industry model for workforce development that is built on competency models and performance-based credentials. NRCA's *ProCertification* program provides a series of system-specific professional certifications along

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with a state-of-the-art, standardized industry training curriculum entitled *Training for Roof Application Careers (TRAC)*, which is designed to reduce the time required for new hires to achieve proficiency. These initiatives are competency-based rather than time-based programs. This new model provides a streamlined and affordable approach to workforce development with a clearly-defined industry career path that includes national recognition of employee achievements. Importantly, *ProCertification* provides a “stackable” micro-credentialing model that encourages ongoing training to achieve higher levels of skill and compensation through structured earn-and-learn work opportunities.

NRCA’s *ProCertification* certifications and *TRAC* training programs provide an innovative approach to addressing the roofing industry’s workforce development needs. NRCA believes the more streamlined IRAP model for apprenticeships contained in the NPRM is ideally suited to enable and support the roofing industry’s efforts to create a more professional and sustainable workforce.

NRCA is concerned the NPRM currently excludes the entire construction industry from participating in the new IRAPs. This appears to be based on the view that existing Registered Apprenticeship Programs are more heavily utilized within the construction industry compared with other industries. However, this ignores the fact that Registered Apprenticeship Programs have never been widely adopted within the roofing industry. We believe this is because traditional time-based Registered Apprenticeship Programs, while effective for some employers, have proven insufficient to meet the workforce development needs of many other employers in today’s rapidly changing economy, workforce demographics and new system technologies. We estimate that less than 10 percent of roofing contractors utilize existing Registered Apprenticeship Programs.

Excluding the roofing industry from the new IRAPs would be a major missed opportunity to meet our members’ workforce needs. The new IRAP model of apprenticeships, coupled with NRCA’s *ProCertification* program, has the potential to greatly expand opportunities for American workers to have a career in roofing and benefit from the family-sustaining and career-enriching jobs our industry provides. NRCA strongly urges reconsideration of the decision to exclude the construction industry, and specifically the roofing industry, from the new IRAPs in the NPRM. It is our understanding that, consistent with the recommendation of the Task Force on Apprenticeship Expansion report dated May 10, 2018, if roofing industry employers are allowed to participate in IRAPs, participants in such programs would not be considered as apprentices for the purpose of meeting the Davis-Bacon Act wage requirements.

Thank you for your attention to NRCA’s views on this important issue. For questions related to this matter, please contact Duane Musser, NRCA’s Vice President of Government Relations, at 202-546-7584 or dmusser@nrca.net.

Sincerely,

A handwritten signature in black ink, appearing to read "Reid Ribble". The signature is fluid and cursive, with the first name "Reid" and last name "Ribble" clearly distinguishable.

Reid J. Ribble
Chief Executive Officer