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To the Employment and Training Administration of the U.S. Department of Labor,

As Executive Director for the Affiliated Construction Trades Ohio Foundation ("ACT Ohio") and on behalf of the nearly 100,000 Ohio Building Tradespeople we represent, I urge the Department of Labor to make permanent the exemption for the construction industry's registered apprenticeship programs in the final Industry Recognized Apprenticeship Programs rule.

ACT Ohio is a 501(c)(5) organization established by the Ohio State Building & Construction Trades Council to promote best practices for Ohio's public and private construction, and to ensure the bar remains high for quality and safety with regard to Ohio's construction industry. ACT Ohio represents 137 local Building Trade union affiliates and their 80 Joint Apprenticeship Training Committee (JATC) schools across Ohio. Our organization works closely with our members' JATC programs to recruit Ohio's next generation of tradespeople.

For over 100 years, our members' apprenticeship programs have been the gold-standard in Ohio for workforce development and jobs training, providing tens of thousands of Ohioans with access to middle-class careers in the Building Trades. According to the Ohio Department of Jobs and Family Services:

- 8 out of 10 construction apprentices in the state of Ohio are trained in our four-year, tuition free, earn-and-learn JATC programs;
- 86% of Ohio's total minority apprentices are registered in our JATC programs; and
- 91% of Ohio's total female construction apprentices are registered in our JATC programs.

Our members invest over \$50 million annually to provide the highest-quality training to apprentices who earn living wages and full healthcare and retirement benefits—at zero cost to taxpayers. Our local economies benefit from our member's efforts to increase access to prevailing wage construction apprenticeships among women, people of color, and veterans across Ohio.

The training standards in union JATC programs are the most rigorous in Ohio. Building Trades apprentices enter the workforce with the safety training and certification necessary to protect themselves, their fellow workers, and the public from harm. Construction is a dangerous industry. The stringent training requirements of our JATC programs mean that only the finest skilled tradespeople enter the construction industry. Our standards assure the quality and safety of every project our apprentices and members build.

Allowing IRAPs to operate with looser standards in the construction industry will increase safety risks and threaten quality-control on a broad scale. I urge the DOL to prevent the degradation of our industry's training model and maintain high standards in construction training by keeping the exemption of the construction industry in the final IRAP rule.

Sincerely,

Matthew Szollosi
Executive Director
Affiliated Construction Trades of Ohio