

Frequently Asked Questions

Why have I never heard of an IRAP before? “Industry Recognized Apprenticeship Program” is a made-up term that big business and their friends in the White House are using to create a way to recognize subpar, fly-by-night training programs in the construction industry.

Are all IRAPs a bad idea? Not necessarily. These programs were designed for industries that lack an existing system for skills-based training. The construction industry already has union apprenticeship programs – which are all registered with the federal Department of Labor and held to a much higher standard than IRAPs in the hospitality industry, for example. We are not against all IRAPs, we just want to keep them out of the construction industry.

How does this regulation work? The Department of Labor has the authority to change rules affecting apprenticeships. They do not need permission from Congress to take action. However, the people have a chance to be heard. DOL must first publish the proposed text of the rule. Once this draft is published, the public has several weeks to submit comments to DOL about the rule. DOL then evaluates these comments and publishes the final rule several months later. The final rule may be very different from the draft rule.

What is our plan? We want the final rule to keep the construction industry exempt from IRAPs. We will organize as many ironworkers as possible to comment to the Department of Labor, asking that construction remain exempt. The more ironworkers who comment, the stronger the signal we send to the White House that this will drive votes on Election Day.

The draft rule has an exemption for construction – are we safe? No. The final rule may take away the construction exemption, no matter what is in the draft rule. Anti-union interest groups are lobbying to do just that.

I’m not an apprentice, how does this affect me? Allowing IRAPs in the construction industry could severely impact signatory contractors’ ability to win work for union ironworkers. The cost of a comprehensive, professional training program like our apprenticeship is higher than the bare bones programs our nonunion competition uses – and the skills gap is obvious. IRAPs would allow nonunion contractors to put inexperienced, untrained and unsafe workers on the jobsite, making it harder for us to do our jobs and putting everyone on site at risk.

Will this directly affect our training programs? Our own standards for registered union apprenticeships will not change – we are committed to teaching ironworkers the skills they need to stay safe on the job. Construction IRAPs would undercut our programs by giving nonunion contractors a leg up, giving them access to government training funds and a toehold in jobs with training standards and prevailing wage.

How do we comment? Our union will help ironworkers comment in two ways. First, members will be able to submit comments online through our website. Second, political coordinators will help ironworkers write comments in person at meetings and comment banks.

I’m not good with technology, can I mail a handwritten comment to DOL? The Department of Labor discourages mailed comments, and Postal Service delays can prevent letters from arriving on time. Ironworkers who prefer to write comments by hand should give their comment to a political coordinator to be scanned and submitted on their behalf, either in a comment bank or individually.