

Ohio State
Apprenticeship Council

The following document is to serve as “comment” for the Ohio State Apprenticeship Council for the Department of Labor 29 CFR Part 29 RIN 1205—AB85 as seen in the June 25, 2019 Federal Register/Vol 84, No. 122.

Apprenticeship in Ohio

Ohio was granted State Apprenticeship Council (SAC) status by the United States Department of Labor in 1957. Ohio currently has 234 apprenticeable occupations with over 600 active Registered Apprenticeship sponsors representing over 10,000 employers. As of August 19, 2019, Ohio has 20,028 registered apprentices. These Registered Apprenticeship programs are found in fields as diverse as: aerospace, construction, construction maintenance, energy, health care, manufacturing, and utilities. Each program includes, at minimum, 2,000 hours of structured on-the-job training and 144 hours per year of related technical instruction.

The Ohio Registered Apprenticeship System is proud to detail the following accomplishments: (Using a 5-year average numbers “2014-2018”)

- Average of 6,928 new apprentices registered; average wage (\$15.60 per hour)
- Average of 1,883 completion certificates, average wage (\$27.17 per hour)
- Have a statewide Recognized Pre-Apprentice pathway since 2010
- Pre Apprentice certificates approved by Ohio Department of Education to award 12 points of credit toward high school graduation
- Facilitated five sponsor programs get statewide articulation agreements with higher education to allow more than 50% credits towards degree.

Benefits of Registered Apprenticeship in Ohio for the apprentice include:

- 98% still employed in occupation at 6 months nationally
- 90% still employed in occupation at 1 year nationally
- Nationally-recognized portable credential
- Sustainable wage and benefits
- Career mapping
- Increased marketable skill set and job security
- Opportunity to have a paid education

Registered Apprenticeship in Ohio ensures a pathway to good, middle-class jobs, by including—

Contractual Agreement with OSAC/U.S. DOL,
Sponsor entity, and Apprentice

Compliance with Federal Regulations 29 CFR 29/30
as well as
State Regulations OAC 5101:11

Defined and Approved standards for the delivery of the
Related Technical Instruction and On the Job training

On the Job Training (OJT)—

- 2000 hours per year
- Structured, Supervised Systematic Training
- Wages and benefits defined in an incremental schedule based on time or competency
- Safety Training

Programs range from 2,000 hours in length to 10,000 based on the level of skill and competencies needed to be mastered

Related Technical Instruction (RTI)—

- 144 + contact hours per year
- Sponsor Provided
 - Possibly in concert with Community College or Adult Career Technical Center
 - Based on Industry standards and defined work process schedule
 - Safety Training

Program range is determined by length of associated OJT and work process schedule.

Technical coursework transfers to college credit and pathway toward a degree. Completion Certificates in Ohio are a nationally recognized portable credential and in some cases a college degree.

Today's Registered Apprenticeship

Ohio apprenticeship exemplifies apprenticeship program characteristics that ensure apprentices are provided that pathway to success. We assert these elements **MUST** be part of ANY apprenticeship program—

- Guaranteed wage progression
- Proper balance between in-class and on-the-job training
- Specific qualifications for instructors
- Apprentice-to-Journeyperson ratios that ensure proper supervision, good training and safe working conditions
- Curriculum that has to meet government-approved standards
- Safety training
- EEO requirements, which protect apprentices from harassment
- Protection for apprentices from arbitrary termination from the apprenticeship program, after probation period
- Periodic review of apprentices

Permanent Exclusion of the Construction Industry

The Ohio State Apprenticeship Council supports maintaining the existing registered apprenticeship for the Bureau of Labor Standards, Standard Occupational Classification codes in the 47-000 and 49-000 ranges. Apprenticeship expansion should not come at the cost of existing registered apprenticeship programs.

DOL must permanently exclude the construction industry from its new system because—

- The IRAP system will offer employers a cheap alternative mechanism for securing apprentices. The regulations...
 - ✓ contain no standards for the content or length of the program
 - ✓ only require paying apprentices minimum wage for the entire duration of their apprenticeship
- The IRAP system will undermine the protections and opportunities the registered system provides for women, minorities, and veterans.
 - ✓ Unlike registered programs, the IRAPS do not have to comply with 29 CFR Part 30, which sets forth equal opportunity and affirmative action requirements

- ✓ IRAPs may not qualify for the same VA benefits our veteran apprentices now enjoy
- IRAP system encourages employers to turn away from the registered apprenticeship system and will come at the expense of workers (who will not be guaranteed the same quality training or wage progressions) and the construction industry at large (with its clear need for more highly-skilled workers)

OSAC supports a clearer definition of the construction sector based on the North American Industry Classification System Manual, which defines the sector as:

“Activities of this sector are erecting building and other structures (including additions); heavy construction other than buildings; and alterations, reconstruction, installation, and maintenance and repairs.”

DOL should drop the proposed formula and permanently exclude the construction industry from the IRAP system.

- There is a 70-year proven track record of construction industry-registered apprenticeship programs.
- Construction industry registered apprenticeship programs constitute the vast majority of private sector apprenticeship programs in existence today. No other private sector is likely to substantially increase participation in the registered apprenticeship system to qualify for an exemption.

The United States apprenticeship system was designed to assure apprentices are treated fairly and obtain valuable occupational skills, knowledge, and ability; and society benefits from these highly trained workers. With this in mind, all apprenticeship programs outside of the 47-000 and 49-000 SOC code ranges that receive taxpayer support should be part of the Registered Apprenticeship system to assure taxpayer dollars are producing highly skilled workers and benefiting communities.

The Ohio State Apprenticeship Council appreciates the opportunity to comment on the proposed rule and respectfully asks that as a state with over 20,000 active registered apprentices that our input be given serious consideration.

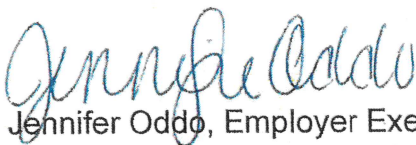
Respectfully,



Rob Gartner, Chairman and Employee Executive Representative
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Dr. Deborah Catri

Deborah B. Catri, Ph.D., Public Executive Representative
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