



August 26, 2019

Administrator Adele Gagliardi
Office of Policy and Development and Research
Employment and Training Administration
Department of Labor
200 Constitution Avenue, N.W., Room N-5641
Washington, D.C. 20210

**Re: Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations,
Docket Number: ETA-2019-0005**

Dear Ms. Gagliardi:

On the behalf of the National Demolition Association (NDA), I am writing to submit the following comments regarding Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations, Docket Number: ETA-2019-0005. The National Demolition Association represents over 500 U.S. and Canadian companies that offer standard demolition services as well as a full range of demolition-related services and products. NDA educates members on the latest advances in equipment and services, provides educational programs and tools to stay abreast of regulatory and safety matters and keeps regulators informed about issues in our industry. NDA also increases public awareness of the economic and societal benefits of demolition.

On June 25, 2019, the Employment and Training Administration (ETA) issued a Notice of Proposed Rulemaking (NPRM) under the National Apprenticeship Act (NAA) which seeks to address America's skilled workforce shortage by expanding apprenticeship opportunities to new industries. The proposed rule would establish a process for recognizing Standards Recognition Entities (SREs) which will in turn recognize Industry-Recognized Apprenticeship Programs (IRAPs).

As outlined in the NPRM, the proposal defines what entities may become SREs; establishes the responsibilities and requirements for SREs, as well as the features of the high-quality apprenticeship programs they will recognize; and lays out how the Administrator of the Office of Apprenticeship will interact with SREs. According to the ETA, these industry-recognized apprenticeships will provide a new apprenticeship pathway that gives industry organizations and employers more autonomy and authority to identify high quality apprenticeship programs and opportunities.

NDA strongly supports efforts by the Administration to improve and expand apprenticeship opportunities in the private sector to address America's growing skills gap. However, we do not support the provision in ETA's proposed rule which excludes the construction industry from participating in the new IRAPs. According to data released by the U.S. Bureau of Labor Statistics on August 6, 2019, there are currently 7.3 million job openings in the United States, including 232,000 openings in the construction industry alone.¹ Like many in the construction sector, the demolition industry has felt the pinch of the skilled labor

¹ U.S. Department of Labor, Bureau of Labor Statistics, "Job Openings and Labor Turnover- June 2019," Aug. 6, 2019. Available at https://www.bls.gov/news.release/archives/jolts_08062019.htm

shortage as the economy has continued to grow. To this end, our member companies would benefit greatly from expanding the avenues available to feasibly train and hire skilled workers to fill their labor needs.

NDA stands ready to work with ETA and represent the demolition industry as the Agency considers changes to apprenticeship programs. Thank you for the opportunity to provide comment on this issue. Please contact Kevin McKenney at kmckenney@demolitionassociation.com or 202-367-2480 with questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Lambert". The signature is fluid and cursive, with a large initial "J" and "L".

Jeff Lambert
Chief Executive Officer