



**CENTRAL MIDWEST**  
REGIONAL COUNCIL OF  
**CARPENTERS**

**IKORCC**  
**JATF**

## OFFICE OF THE DIRECTOR OF EDUCATION

**Neal Strange**  
Director of Education

711 Greenwood Springs Dr.  
Greenwood, IN 46143

Dear Chairman Williams and Ranking Member Velázquez,

On behalf of the Central Midwest Regional Council of Carpenters (CMRCC) and the Indiana-Kentucky-Ohio Joint Apprenticeship Training Fund (IKORCC JATF), thank you for the opportunity to share our perspective on the critical role Registered Apprenticeships play in developing a highly skilled construction workforce. The CMRCC and IKORCC JATF support more than 300 contractors and over 38,500 union members across Indiana, Kentucky, and Ohio. Our mission is to ensure that contractors have access to the most qualified workers in the industry and that our members have access to long-term, high-wage careers.

### REGISTERED APPRENTICESHIP: A PROVEN WORKFORCE MODEL

Our apprenticeship programs follow the U.S. Department of Labor's Standards of Apprenticeship—the gold standard for work-based learning. These standards ensure:

- Strong employer involvement
- High-quality related technical instruction
- Structured on-the-job learning with skilled mentors
- Progressive wage increases tied to skill attainment
- Two nationally recognized credentials upon completion
  - A DOL Certificate of Completion
  - An Associate of Applied Science degree in Apprenticeship Technology

We offer three primary four-year apprenticeship programs—Carpentry, Millwright, and Floor Covering—focused on industrial and commercial construction. Apprentices attend one week of training each quarter at one of our state-of-the-art training centers. Courses are taught by journey-level instructors trained at the United Brotherhood of Carpenters' International Training Center in Las Vegas. Approximately 20% of instruction is classroom-based, with the remaining 80% spent in hands-on shop training.

Outside the classroom, apprentices work year-round for signatory contractors, earning strong wages while applying and refining their skills under the guidance of experienced journey-workers.

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## **SAFETY AND CONTINUING EDUCATION**

Safety is foundational to every aspect of our training. Every course includes a safety component, and our training centers continually update offerings to reflect emerging technologies and evolving industry needs. All training—whether for apprentices or long-standing members—is provided at no cost to the individual. Contractors recognize the value of this rigor and invest in our members through wages that exceed typical construction pay.

## **BARRIERS TO SUPPLYING A SKILLED WORKFORCE**

Despite strong demand for skilled labor—billions of dollars in construction projects across our three states—several barriers limit our ability to meet workforce needs.

### **1. CONSTRUCTION TAX FRAUD**

Unscrupulous contractors who misclassify workers or pay them off the books undermine legitimate employers and weaken the industry. These practices:

- Allow bad actors to underbid responsible contractors
- Reduce opportunities for Registered Apprentices
- Harm communities through lost tax revenue

It is estimated that construction tax fraud costs taxpayers over \$10 billion annually across the U.S. Increased enforcement would help level the playing field and strengthen the workforce pipeline.

### **2. MISUSE OF THE TERM “APPRENTICESHIP”**

In recent years, programs labeled as “apprenticeships” have proliferated, many lacking the rigor, safety standards, mentorship, wage progression, and credentialing required under federal Registered Apprenticeship regulations. This creates confusion for students, parents, educators, and employers, and dilutes the meaning of a true apprenticeship.

The term **“apprenticeship” should be reserved exclusively for programs meeting U.S. DOL standards**, as defined in Title 29 CFR Parts 29 & 30.

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### 3. HIGH SCHOOL WORK-BASED LEARNING MISALIGNMENT

We appreciate the Department of Education's interest in expanding work-based learning, but placing high school students directly into Registered Apprenticeships is not appropriate for industrial and commercial construction:

- **Sixteen-year-olds are still exploring career options** and may not be ready to commit to a four-year apprenticeship.
- **Construction sites pose safety risks** that are not suitable for minors.
- **Contractors lack the capacity** to provide the level of mentorship required for youth in these environments.

### A BETTER PATH FORWARD: CERTIFIED PRE-APPRENTICESHIPS

Rather than creating new, untested models, federal initiatives should support **certified pre-apprenticeship programs** that align directly with Registered Apprenticeships. Federal investment in these programs would:

- Provide students with safe, structured, hands-on learning
- Prepare them with foundational skills before entering a jobsite
- Support contractors with resources to train mentors and manage youth safely
- Strengthen and expand the Registered Apprenticeship pipeline

### CONCLUSION

The CMRCC and IKORCC JATF strongly believe that expanding and protecting Registered Apprenticeship pathways is essential to building a safe, skilled, and sustainable construction workforce. We respectfully ask that you consider the recommendations outlined in this letter and welcome further discussion on these important issues.

Sincerely,

Neal Strange  
Director of Education

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