

NATIONAL TASK FORCE ON TRADESWOMEN'S ISSUES

Recommendations of The National Taskforce on Tradeswomen's Issue

**RE: Recommendations for NPRM to Revise 29 CFR part 29
 EO 12866 Meeting, RIN 1205-AC13**

The **National Taskforce on Tradeswomen's Issues (TWTF)** is a coalition uniting the expertise and actions of local, regional and national organizations, advocates, allies and individual tradeswomen to support women in achieving access, opportunity, and equity in the construction industry, and other nontraditional occupations.

The Taskforce works to promote public policies and advocacy initiatives at the national, state and local levels to improve, enforce, fund, and promote best practices towards equity in apprenticeship, training, workforce development, career and technical education, nontraditional employment, and the job site experience.

Nearly a quarter of a million women work in the construction trades and earn wages offering economic security. Over the course of her lifetime, a woman working as an electrician will make more than \$1 million more than her counterpart working in a traditionally female-dominated job, such as a childcare worker or service worker. Poverty rates for women remain at historically high levels, one in seven, substantially higher than poverty rates for men, with the highest rates experienced by American Indian/Alaskan Native, Black and Latina women. Access to high-wage careers is critical for women's economic advancement.

Women who are given access to high-wage, blue-collar and other nontraditional occupations through quality pre- apprenticeship training, information, and support services, flourish in these careers. However, registered apprenticeship, a primary pathway into high-skilled blue-collar jobs, is not serving women. Nationally, women represent only 3% of construction apprenticeships, and only 7% in all registered apprenticeship programs. Several programs and localities around the country have proven that these low numbers are not inevitable when policy and programmatic approaches, as outlined below, are applied.

Research has shown that women, and particularly women of color, face discrimination in hiring and long-term employment and experience high rates of sexual harassment and gender bias on the job. They are less likely to be retained on core crews, promoted to field leadership positions or to receive the same on-the-job technical training as men, and they do not complete their apprenticeships at the same rates as their male counterparts.

When tradeswomen have access to sustainable careers, which includes adequate work hours, workplace policies that support work/family balance, comprehensive on-the-job training and freedom from sexual and racial harassment, industry benefits greatly from access to this skilled workforce.

The Taskforce acknowledges the critical role of apprenticeship in the training of this skilled workforce and the central role of a strong and bias-free structure for apprenticeship to serve all apprentices, the industry workforce pipeline, and the diverse complexion of US workers. 29 CFR 29 as well as its oversight by the DOL's Office of Apprenticeship is provides this base.

September 7, 2023

The Taskforce offers these notes regarding recommendations for the proposed NPRM revisions by the US DOL Office of Apprenticeship to 29 CFR 29 Apprenticeship Regulations.

- A. The Taskforce endorses the Recommendations regarding 29 CFR 29 made to the Advisory Committee on Apprenticeship and to this body submitted by Chicago Women in the Trades. See Attached.

In particular the Taskforce strongly endorses

1. “Living Wage” standards for apprenticeship: the DOL should not support training into poverty
2. Accountability for bias-free processes from outreach, application, acceptance to training, classroom and worksite environments, and complaint procedures
3. Full data collection and transparent reporting of apprenticeship processes to oversight bodies and the general public while safeguarding apprentice individual privacy
4. Full disclosure and accountability to the individual apprentice regarding progress evaluations and complaint procedures at the Program and Oversight Agency levels.

- B. The Taskforce also recommends that 29 CFR 29 support

1. Requiring objective and bias-free standards and processes for Competency-based Programs.
 - a. Clear bias-free standards and processes intake and completion
 - b. Clear bias-free standards and processes that document the necessary and sufficient conditions for progress steps and step raises
2. If proposed, Pre-apprenticeship standards and guidelines include best practices as developed by TWTF and nationally recognized tradeswomen’s organizations including recognition of the existing success of these best practices.

Thank you for your attention and for the opportunity to highlight these concerns.

Meg Vasey and Jessica Stender

To follow up on these recommendations, please contact the Taskforce Policy Committee Co-Chairs

Jessica Stender at 415-575-2394, jstender@equalrights.org

Meg Vasey at 510-207-0603, mdvasey@gmail.com

For more information on the National Taskforce on Tradeswomen’s Issues, please visit our website at: www.tradeswomentaskforce.org or contact the Co-Chairs at:

Connie Ashbrook, TWTF Co-Chair at 503-381-8212, Connie.ashbrook@outlook.com

Janelle DeJan, TWTF Co-Chair at 504-756-5818, Janelle.dejan@notep.net

Many thanks to Chicago Women in Trades and their Policy Committee for their foundational work and their recommendations.