
February 2, 2022

Angela Hanks
Acting Assistant Secretary
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Dear Acting Assistant Secretary Hanks:

The Western Governors' Association (WGA) supports the U.S. Department of Labor (DOL) Employment and Training Administration proposal to rescind the industry-recognized apprenticeship program (IRAP) rule ([86 FR 62996](#)). WGA represents the Governors of the 22 westernmost states and territories and is an instrument of the Governors for bipartisan policy development, information-sharing and collective action on issues of critical importance to the western United States.

To promote greater development of in-demand career skills, western states are leading the way in expanding work-based learning opportunities, including registered apprenticeships, for both students and adults. In WGA Policy Resolution [2022-03](#), *Workforce Development in the Western United States*, Western Governors "encourage Congress and federal agencies to support and incentivize state-, local-, and industry-led partnerships to create and scale work-based learning and apprenticeship programs."

New federal investments in apprenticeships should align with existing state efforts to foster a coherent system with minimal duplication. In [comments](#) on the IRAP rule submitted on August 26, 2019, Western Governors noted that their states have expanded registered apprenticeships to a variety of sectors, including information technology and healthcare professions, and expressed concern that the creation of IRAPs in sectors outside the jurisdiction of the state apprenticeship agencies may cause confusion and undermine the significant time and effort that states have invested in registered apprenticeships. The Governors' other concerns, in addition to those regarding duplication of state efforts, include uncertainty about the portability of IRAP credentials, protections for participants, and insufficient data and reporting on program outcomes.

Western Governors support rescission of the IRAP rule and urge Congress and DOL to instead increase line-item formula funding for state apprenticeship programs and provide states with technical assistance to strengthen partnerships between workforce and apprenticeship entities. This will expand and scale apprenticeship opportunities while maintaining quality for participants and minimizing duplication of efforts at the federal, state and local level.

Western Governors appreciate DOL's efforts to expand work-based learning opportunities to provide more workers with the skills they need in today's economy.

Sincerely,



Brad Little
Governor of Idaho
Chair, WGA



Jared Polis
Governor of Colorado
Vice Chair, WGA