



Adele Gagliardi
Administrator, Office of Policy Development and Research
US Department of Labor
200 Constitution Avenue NW
Room N-5641
Washington, DC 20210

Re: RIN 1205-AB85: Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations

Dear Ms. Gagliardi,

On behalf of the Outdoor Recreation Roundtable (ORR), thank you for the opportunity to provide comments on the Department of Labor's (DOL) proposed rule change RIN: 1205-AB85 Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations. We appreciate DOL taking feedback as it looks to expand apprenticeship opportunities in industries currently lacking such opportunities.

ORR is the nation's leading coalition of outdoor recreation trade associations – now totaling 28 members, representing more than 50,000 American businesses. Together, we represent an industry that makes up 2.2 percent of U.S. Gross Domestic Product, supports 4.5 million American jobs and contributes \$734 billion in economic output, surpassing other sectors such as petroleum, coal, and computer and electronic products.

The outdoor recreation economy is growing faster than the economy as a whole, but the industry faces a significant gap in workforce skills. Entities like the nation's Conservation Service Corps – which enroll over 25,000 young people and veterans annually in all 50 states, the District of Columbia, and several U.S. territories – as well as Oregon State University's new Outdoor Economy Initiative can help train a next-generation workforce while providing cost-effective ways to address needed infrastructure projects.

ORR supports expanding DOL's Industry-Recognized Apprenticeship Program to include those critical to restoring economic resiliency to our rural and under-resourced communities and industries that directly support, service and benefit the growing outdoor recreation economy including energy and resource management; transportation and infrastructure; and outdoor recreation retail, manufacturing, guiding and related services. Doing so can support career pathway development at a time when the needs of the industries that support outdoor recreation on our nation's public lands and waters are changing and expanding faster than ever before.

We provided general feedback on DOL's Industry-Recognized Apprenticeship Program. The comments are the following:

1. Expand “In-Demand Industries” and Target Investment to these Industries

DOL should expand the industries categorized as “in-demand.” The current categorization excludes major economic sectors experiencing rapid growth. Outdoor recreation retail, manufacturing, guiding and related services; energy and resource management; and transportation and infrastructure are not currently included as “in-demand.” The outdoor recreation economy currently generates 4.5 million jobs across multiple industries and is growing faster than the U.S. GDP. These jobs are highly technical, require advanced skillsets, and experience wage growth faster than the average for U.S. jobs. The resource management field faces an almost \$19 billion federal lands maintenance backlog and an impending retirement cliff. This creates major current and future workforce needs. In their 2017 Infrastructure Report Card, the American Society of Civil Engineers gave public parks a D+ rating, citing the National Park Service’s \$11.9 billion maintenance backlog.

DOL should invest in apprenticeships for in-demand industries and deliberately target investments to resource management, transportation and infrastructure, and outdoor recreation-related industries. DOL should do this because these areas have not been prioritized at the same level as industries already categorized as “in-demand.” Targeted investment will facilitate apprenticeship expansion and development in these high-growth industries, addressing their major workforce development needs.

2. Prioritize Past Accreditation Experience

DOL should prioritize Standard Recognition Entities (SRE) applicants with accreditation experience for application approval and financial support. This can ensure Industry Program consistency and quality and streamline Industry Program deployment. Past experience accrediting successful work-based learning programs demonstrates an SRE applicant’s ability to maintain a successful on-going quality assurance relationship. This quality assurance relationship is important for maintaining consistency and quality in Industry Programs. SRE applicants with successful accreditation history typically have existing accreditation standards that can be applied to Industry Programs as well. This can reduce time to Industry Program deployment by reducing time spent developing completely new standards.

3. Incentivize Public Benefit

DOL should incentivize apprenticeships providing public benefit in addition to workforce development. Many workforce development programs provide public benefit through their on-the-job training projects. The work includes supporting outdoor recreation by increasing accessibility to outdoor spaces, maintaining lands and waterways, enhancing outdoor recreation-related infrastructure, addressing the almost \$19 billion federal lands maintenance backlog, and enhancing the overall outdoor experience enjoyed by tens of millions of Americans. Targeted investments can scale these programs to Industry Programs or establish new Industry Programs with similar public benefit. This can help address America’s skills gap and its other pressing needs.

4. Coordinate across federal agencies

We encourage DOL to coordinate with other federal agencies to align existing workforce development policies and procedures with Industry Program implementation. Agencies such as the Bureau of Land Management, Bureau of Reclamation, National Park Service, U.S. Fish and Wildlife Service and the U.S. Forest Service are significantly involved in workforce development. Aligning policies and procedures across agencies can coordinate these existing workforce development efforts with Industry Program implementation. This can encourage unique public-private partnerships and expand apprenticeship opportunities across important industries.

We believe incorporating these comments can further DOL's goal to expand apprenticeship opportunities and address America's skills gap. Please feel free to contact me with any further questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jessica Wahl", enclosed within a thin black rectangular border.

Jessica Wahl
Executive Director