



November 5, 2025

The Honorable Bill Cassidy
Chairman
Committee on Health, Education, Labor and Pensions
U.S. Senate
Washington, DC 20510

The Honorable Bernie Sanders
Ranking Member
Committee on Health, Education, Labor and Pensions
U.S. Senate
Washington, DC 20510

Dear Chairman Cassidy, Ranking Member Sanders and Members of the U.S. Senate Committee on Health, Education, Labor and Pensions:

On behalf of Associated Builders and Contractors, a national construction industry trade association with 67 chapters and more than 23,000 members, I write to thank you for holding the hearing, [Registered Apprenticeship: Scaling the Workforce for the Future](#). This hearing is critical to addressing the nation's skilled labor shortage and expanding workforce development opportunities for all Americans.

ABC's 67 chapters educate craft, safety and management professionals using innovative and flexible learning models, such as just-in-time task training, competency-based progression and work-based learning. These talent development initiatives occur alongside ABC's more than 450 federal and state government-registered apprenticeship programs, or GRAPs, that prepare American's nationwide for safe and productive work in more than 20 occupations. Further, [ABC members invested an estimated \\$1.6 billion in construction industry workforce development to upskill 1.3 million course attendees in 2023](#), including hundreds of GRAPs, independently administered by ABC member companies.

However, it is clear that, at current rates of participation and completion, federal and state GRAPs still fail to meet the construction industry's short- and long-term skilled workforce development needs. According to an annual ABC analysis of [U.S. Department of Labor data](#), ABC estimates that, in fiscal year 2024, 290,000 apprentices were enrolled in federal and state GRAPs that yielded less than 40,000 completers—well short of the [439,000 workers needed in 2025](#) alone.

ABC and its members' investment in GRAPs is reflected by [DOL data](#) displaying significant growth in nonunion GRAPs between FY 2015 and FY 2024.

The DOL's data presents five-year trend lines indicating stronger proportional growth in the number of nonunion GRAPs, apprentice participants and apprentice completers compared to union-affiliated GRAPs since FY 2019.

- In FY 2024, 84% of the construction industry's GRAPs were nonunion providers. The number of nonunion GRAPs has grown by 25% since FY 2019, compared to a 7% decrease in union-affiliated GRAPs since FY 2019.
- Participants in nonunion GRAPs increased by 40.7% from FY 2019 to FY 2024, compared to 10.7% for union programs.
- Completers of nonunion GRAPs increased by 31.7% from FY 2019 to FY 2024, compared to 13.4% for union programs.
- In FY 2024, 29.74% of all construction industry GRAP participants were in nonunion programs.

Further, while construction unions represent just 10.3% of the U.S. construction workforce, they continue to operate a majority of the nation's registered apprenticeship programs, accounting for roughly 69% of participants. This helps explain unions strong support for policies that prioritize or mandate registered apprenticeship programs on taxpayer-funded projects and expand federal funding for GRAPs. However, these requirements may unintentionally limit opportunities for the many high-quality, industry-recognized programs that successfully train the majority of America's construction workforce. A balanced approach that values all

proven workforce development models—both union and nonunion—best ensures the construction industry can meet the nation’s growing needs.

Policy Recommendations

The GRAP system provides opportunities for Americans to pursue rewarding careers in construction without crushing debt. However, rigid structures and long completion times may discourage sponsor and apprentice participation. Congress should amend the system to encourage contractor participation and expand opportunities for workers.

ABC finds that state regulations surrounding GRAPs significantly affect contractor participation. While some states provide contractors with flexibility to tailor apprenticeship programs to industry needs, others impose prescriptive requirements and limit adaptability. Without flexibility, multiskill employers in such states may turn to alternatives that better meet their needs. This challenge arises from the definition of a “trade” prescribed by apprenticeship contract addenda—such as a “Schedule of Work Process,” “Trade Information” or “Exhibit A”—which establish required hours for uniform and trade-specific on-the-job training.

ABC urges Congress to define on-the-job training hours as 75% uniform and approved by the DOL or state, and 25% employer-specific, regardless of trade. This change would allow contractors nationwide to align apprenticeship training with their operations and encourage greater GRAP participation.

In addition, ABC encourages the committee to support industry-recognized, national credentials that provide craft and safety training for today’s leading construction positions. Together, GRAPs and these programs will help fill industry’s projected demand for 499,000 new workers in 2026.

ABC also applauds Congress for passing pro-worker, commonsense reforms as a part of the Working Families Tax Cut, including expanding 529 accounts for skilled trades training and supporting Pell Grants.

ABC is proud to play a vital role in educating the next generation of America’s skilled construction industry professionals and looks forward to working with the committee to advance workforce development solutions that strengthen America’s construction industry, infrastructure and economic future.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristen Swearingen", with a stylized, cursive script.

Kristen Swearingen
Vice President, Government Affairs