

D. FORM OF GUARANTY:

Accompanying this Proposal is a bid bond in the amount of
10% of bid Dollars \$ _____ as bid security.

LIST OF SUBCONTRACTORS

The Bidder further certifies that the following firms or businesses will be awarded subcontracts for the stated portions of the work in the event the Bidder is awarded the Contract. (Add additional pages as required)

<u>Subcontractor Name & Address</u>	<u>Specialty Area</u>
1. <u>D'Amico Concrete Inc 714 Country Ln Morton PA</u>	<u>Concrete</u>
2. <u>Giuliani & Sons Paving/Concrete 2063 Burnell road, Warrington PA</u>	<u>Paving</u>
3. _____	_____
4. _____	_____

ADDENDUMS:

The bidder acknowledges receipt of the hereinafter enumerated Addendums which have been issued during period of bidding and agrees that said Addendums shall become a part of this contract. The bidder shall list below the numbers and issuing dates of the bulletins.

<u>Addendum No.</u>	<u>Issuing Date</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

The undersigned hereby certifies that this Proposal is genuine, and not sham or collusive, or submitted in the interest or on behalf of any person, firm or corporation not herein named, and has not, induced any other persons to refrain from biddings, and has not in any way sought by collusion to secure for himself an advantage over any other bidder.

FIRM NAME Jurich, Inc

ADDRESS 80 Clayton Park Dr Glen Mills Pa 19342

BUSINESS PHONE# (610) 459-3236

Official

By 

Darrin MacMillen

TITLE President

Contractor Responsibility Certification

Firm Name: Jurich, Inc
Firm Address: 80 Clayton Park Drive
Glen Mills, PA 19342
Contact Name: Darrin MacMillan
Telephone No.: (610) 209-8869
Fax No.: (610) 459-3236
Email Address: darrin@jurichinc.com
Project Name: Observatory Hill Recreation Area
Phase 1 - Rebid
Project Number: _____

I attest that I have read, and will comply with the Township of Upper Darby Model Responsible Contractor Ordinance.

Signature:  Date: 4/22/2026
Darrin MacMillan

The submitting firm is required to certify compliance with the contractor responsibility standards set forth below by checking appropriate boxes. Specifically, to perform work for Upper Darby Township, submitting firms must answer "Yes" to Questions 1, 2 and 9, 10, 11, 12, 13 and 14 and answer "No" to Questions 3 through 8.

- (1) Does the firm have or will it obtain all valid, effective licenses, registrations or certificates required by federal, state, county, or local law, including, but not limited to, licenses, registrations or certificates required to: (a) do business in the designated locale; and (b) perform the contract work it seeks to perform. These shall include, but not be limited to, licenses, registrations or certificates for any type of trade work or specialty work which the firm proposes to self-perform?

Yes No

(2) Does the firm meet the bonding requirements for the contract, as required by applicable law or contract specifications and any insurance requirements, as required by applicable law or contract specifications, including general liability insurance, workers compensation insurance and unemployment insurance requirements?

Yes No

(3) Has the firm been debarred by any federal, state or local government agency or authority in the past three (3) years?

Yes No

(4) Has the firm defaulted on any project in the past three (3) years?

Yes No

(5) Has the firm had any type of business, contracting or trade license, registration, or other certification suspended or revoked in the past three (3) years?

Yes No

(6) Has the firm been cited for a willful violation of federal or state safety laws as determined by a final decision of a court or government agency in the past three (3) years?

Yes No

(7) Has the firm or its owners been convicted of any crime relating to the contracting business as determined by a final decision of a court or government agency in the past ten (10) years?

Yes No

(8) Has the firm, in the past three (3) years, been found by a final decision of a court or government agency in violation of any law applicable to its contracting business, including, but not limited to, licensing laws, tax laws, prompt payment laws, wage and hour laws, prevailing wage laws, environmental laws or others, where the result of such violation was the payment of a fine, back pay damages or any other type of penalty in the amount of \$1,000.00 or more?

Yes No

(9) Does the firm agree to pay all craft employees that it employs on the project the current wage rates and benefits as required under applicable federal or state wage laws for the duration of the referenced project?

Yes No

(10) Does the firm participate in a Class A Apprenticeship Program for each separate trade or classification in which it employs craft employees and agree to continue to participate in such program or programs for the duration of the referenced project?

(A) For purposes of this section, a "Class A Apprenticeship Program" is an apprenticeship program that is currently registered with and approved by the U.S. Department of Labor or a state apprenticeship agency and has graduated apprentices to journeyman status for at least three (3) of the past five (5) years.

(B) If a firm is identified as the lowest responsible bidder or otherwise selected as the prospective awardee or as a subcontractor of an awardee, it shall provide appropriate documentation, as determined by the Central Purchasing Department, to verify it meets the requirements of this section for each trade or classification of craft workers it will employ on the project. This verification shall be provided prior to performance of work by the firm and the documentation shall clearly indicate which crafts the firm employs and which crafts are covered by the identified apprenticeship programs.

Yes No

** see note*

(11) The construction manager, general contractor or other lead or prime contractor responsible for the project shall ensure that at least 70 percent of the craft labor workers employed on the project shall be comprised of either journeyman workers who have successfully completed a Class A Apprenticeship Program as defined in Section 3(c)10 of this ordinance. The apprenticeship participation specified by this section must be in the same trade or craft for which the workers are employed on the project.

Yes No

**See note*

(12) Does the firm agree to notify the Central Purchasing Department of any material changes to any matters attested to in this certification within seven (7) days?

Yes No

(13) Does the firm understand and agree that, if it is a general contractor, construction manager or other prime contractor and it receives a Notice of Intent to Award Contract, it shall provide the Central Purchasing Department within seven (7) days a Subcontractor List that identifies any subcontractors it will use in connection with the project and furnish Contractor Responsibility Certifications for all identified subcontractors with all required supporting documentation.

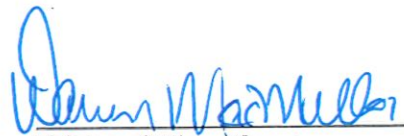
Yes No

(14) Does the firm understand and agree that this certification must be completed by an authorized representative of the firm that has sufficient knowledge and information to address all matters addressed herein.

Yes No

In executing this Responsibility Certification, the submitting firm understands and agrees that if the Central Purchasing Department determines that this certification contains false or misleading material information that was provided knowingly or with reckless disregard for the truth or omits material information knowingly or with reckless disregard of the truth, the firm may be prohibited from performing work for the Township of Upper Darby for a period of three (3) years. Such circumstances shall also subject the firm to any other penalties and sanctions, including contract termination, available to the Township of Upper Darby under law. A contract terminated under these circumstances shall further entitle the Township of Upper Darby to withhold payment of any monies due to the firm as damages.

I certify that the foregoing representations regarding the past performance and present qualifications of the undersigned firm are true and correct.



Print and Sign Name
Darrin MacMillan
President

Title

Jurich, Inc
Name of Firm

4/22/2026

Date

* Note- see attached RCO petition.

Subscribed and sworn to
before me this 22 day
of April, 2026

Diana J. Chiappetta

Notary Public

My Commission Expires: _____

Commonwealth of Pennsylvania - Notary Seal
Diana J. Chiappetta, Notary Public
DELAWARE County
My commission expires November 1, 2028
Commission number 1026048

EXPERIENCE QUESTIONNAIRE

CONTRACT IDENTIFICATION

REBID - OBSERVATORY HILL RECREATION AREA PHASE 1

SUBMITTED TO THE TOWNSHIP OF UPPER DARBY

BY *Jurich, Inc* (-Corporation
 (-Partnership
 (-An Individual

PRINCIPAL OFFICE ADDRESS

(The signer of this questionnaire guarantees the truth and accuracy of all statements and of all answers to interrogatories hereinafter made.)

1. What type of business is Bidder's organization? *(utility) Sewer Storm Water, Excavation*
2. How many years has Bidder's organization been performing work, as a contractor or subcontractor, of the type required for this Project? *38 years*
3. Provide information on all projects currently in progress. *(attached)*

Contract Amount	Type of Work	When Completed	Name and Address of Owner	Engineer/Architect
<i>(see attached)</i>				

4. Has Bidder's organization ever defaulted on any contract or failed to complete any contract?
If so, where and why?

No

5. List names, addresses, and phone numbers of individuals or organizations that can be contacted by Township or Engineer to obtain references.

Darrin MacMillan 80 Chayton Park Dr (610) 209-8869
Glen Mills, PA 19342
Dewey Jurich, Jr 24 Turkey Holbro Road
Kennett Sq Pa 19345 (610) 715-7735

6. What is the construction experience of the principal individuals of Bidder's organization?

(attached)

Individual's Name	Present Position or Office	Magnitude and Type of Work	In What Capacity?

STATE OF Pennsylvania

COUNTY OF Delaware

being duly sworn deposes and says

that he is President of Jurich, Inc
Title Name of Organization

and that the answers to the foregoing questions and all statements therein are true and correct.

Signature *Darrin MacMillan*
Darrin MacMillan

Sworn to before me this 22nd Day of April, 2026

My commission expires

Diana J. Chiappetta
Signature of Notary Public

*Type or print name below each signature.

Commonwealth of Pennsylvania - Notary Seal
Diana J. Chiappetta, Notary Public
DELAWARE County
My commission expires November 1, 2028
Commission number 1026048

CONTRACTOR RESPONSIBILITY CERTIFICATION FORM

For simplicity, all contractors and subcontractors are designated as contractors herein below:

Contractor Name: Jurich, Inc. Date: 4/22/26

Contractor Address: 80 Clayton Park Drive
Glen Mills, PA 19342

Contact Name: Darrin MacMillan

Phone No.: 610-459-3236 Fax No.: _____

Email Address: darrin@jurichinc.com

Project Name: Observatory Hill Recreation Area Phase 1 Rebid

Contractor certified by answering each of the questions below:

CHECK ONE FOR EACH QUESTION	YES	NO
(1) The Firm has all valid, effective licenses, registrations or certificates required by federal, state, county or local law, including but not limited to, licenses, registrations or certificates required to: (a) do business in the designated local; and (b) perform the contract work it seeks to perform. These shall include, but are not limited to, licenses, registrations or certificates for any type of trade work or specialty work which the Firm proposes to self-perform.	X	
(2) The Firm meets the bonding requirements for the contract, as required by applicable law or contract specifications and any insurance requirements, as required by applicable law or contract specifications, including general liability insurance, workers compensation insurance and unemployment insurance requirements.	X	
(3) The Firm has not been debarred by any federal, state or local government agency or authority in the past three (3) years.	X	
(4) The Firm has not defaulted on any project in the past three (3) years.	X	
(5) The Firm has not had any type of business, contracting or trade license, registration, or other certification suspended or revoked in the past three (3) years.	X	
(6) The Firm has not been cited for a willful violation of federal or state safety laws in the past three (3) years.	X	
(7) The Firm and its owners have not been convicted of any crime relating to the contracting business by a final decision of a court or government agency in the past ten years	X	
(8) The Firm has not within the past three years been found in violation of any law applicable to its contracting business, including but not limited to, licensing laws, tax laws, prompt payment laws, wage and hour laws, prevailing wage laws, environmental laws or others, where the result of such violation was the payment of a fine, back pay damages or any other type of penalty in the amount of \$1,000 or more.	X	

CHECK ONE FOR EACH QUESTION	YES	NO
(9) The Firm will pay all craft employees that it employs on the project the current wage rates and benefits as required under applicable federal, state, or local wage laws.	X	
(10) The Firm participates in a Class A Apprenticeship Program for each separate trade or classification in which it employs craft employees and shall continue to participate in such program or programs for the duration of the project.	X See note*	
(11)The Firm has all other technical qualifications and resources, including equipment, personnel, and financial resources, to perform the referenced contract, or will obtain same through the use of qualified, responsible subcontractors.	X	
(12)The Firm will maintain all qualifications, resources and capabilities referenced in this certification throughout the duration of the project.	X	
(13)The Firm shall notify Upper Darby within seven (7) days of any material changes to all matters attested to in this certification.	X	
(14)The Firm understands that the Contractor Responsibility Certification required by this section shall be executed by a person who has sufficient knowledge to address all matters in the certification and shall include an attestation stating, under the penalty of perjury, that the information submitted is true, complete and accurate.	X	

NOTE: As required by the Ordinance, if the bidder receives a Notice of Intent to Award Contract, the bidder shall provide Upper Darby with a final subcontractor list and subcontractor information (including subcontractor certifications), if not previously provided.

VERIFICATION

I certify that the information contained in the Contractor Responsibility Certification is true and correct. I further understand that false statements made in this Certification may be subject to the penalties under the law related to unsworn falsification to authorities, including but not limited to, the penalties set forth in 18 Pa.C.S.A. § 4904.

ATTACH ADDITIONAL SHEETS IF NECESSARY

Signature of Contractor's Authorized Representative: Dawn Marmelstein
 Title: ~~VP~~ President
 Date: 4/22/2026

*Note - See attached RCO petition.



PREQUALIFICATION CERTIFICATE

General

Business Partner Id: 016157

Status: Qualified

Federal ID Number: 23-2484559

Line Of Credit: \$300,000.00

Line Of Credit Expiration: 04/18/2027

Maximum Capacity: \$16,582,350.00

Performance Factor: 6

Issued: 04/18/2026

Effective: 04/18/2026

Expiration: 06/30/2026

In accordance with the Department regulations you are hereby notified of the performance factor, maximum capacity rating, and work classifications assigned to you. You are eligible to perform as a Prime Contractor.

Contractor

Name	Address	City	State	Zip	Zip + 4
JURICH, INC.	80 Clayton Park Drive	GLEN MILLS	PA	19342	

Subsidiaries

Name	FID
------	-----

No records found.

Work Class Codes

Code	Group	Description	Type
B	Earthwork	Building Demolition	R
B1	Incidental Construction	Asbestos Removal	R
		Other Excavation and Grading (Roadway Patches, Drainage, Structure Related, etc.)	R
C1	Earthwork		
C3	Incidental Construction	Geotextiles	R
H	Incidental Construction	Drainage, Water Main, Storm Sewer	R
H1	Incidental Construction	Pipe and Culvert Cleaning	R
H2	Incidental Construction	Pavement Base Drains	R
K	Incidental Construction	Curbs, Sidewalks, Inlets, Manholes	R
K1	Incidental Construction	Masonry Work	R
K2	Incidental Construction	Concrete and Masonry Coatings	R
M2	Roadside	Silt Barrier Fence, Gabions, Erosion Control	R

You have been qualified as a General Highway Contractor to do work in the Commonwealth of Pennsylvania.

Signature

VALIDATE AND ISSUED BY: Betty C. Bottali /s/

PREQUALIFICATION OFFICER

Comments

Line Of Credit Expired

Audit Information

Created By	Created On	Modified By	Modified On
ECMS System/PennDOT	04/18/2026 12:15:07 AM	ECMS System/PennDOT	04/18/2026 12:15:07 AM

JURICH INC

Current Contracts (As both Prime & Sub)

4/1/2026

AMOUNT	TYPE OF WORK	ANTICIPATED COMPLETION	PERCENT COMPLETE	OWNER'S NAME & ADDRESS	ENGINEER
	T&M Sewer Maintenance	6/30/2026	N/A	DELCORA, 100 E 5th Street, Chester, PA 19013	DELCORA
	T&M Sewer Maintenance	4/30/2026	N/A	Tinicum Township	MacCombie Engineering
\$ 219,287.00	Chester Township Stormwater Infrastructure project	6/1/2026	50%	Chester Township, 1150 Engle Street Chester, PA 19013	MGE Associates
\$ 1,720,000.00	SJT (DELCORA) PS Rebuilds & Corrosion Impvmt	5/1/2026	95%	DELCORA, 100 E 5th Street, Chester, PA 19013	Delcora
\$ 2,500,000.00	Birch Street Reconstruction	5/1/2026	90%	Kenett Square Borough	Penonni Engineering Assoc.
\$ 131,990.00	Guilford Road Sanitary Sewer Replacement	4/30/2026	95%	Upper Darby Township	MGE Associates
\$ 812,235.00	Chester Water Authority ARV project	7/1/2026	0%	Chester Water Authority, 415 Welsh St, Chester, PA 19013	CWA
\$ 639,460.00	Walnut Street Sanitary Sewer Upgrades	7/30/2026	0%	Borough of Colwyn, 221 Spruce St, Darby, PA 19023	MGE Associates
\$ 507,366.00	N. Heilbron Road Force Main Replacement	5/30/2026	25%	Middletown Township ; 27 N. Pennell Road Media, PA 19063	Herbert, Rowland & Grubic, Inc.
\$ 799,891.00	West Chester Pike Sanitary Sewer Replacement	8/1/2026	50%	Newtown Township Sewer Authority	MacCombie Engineering
\$ 2,794,000.00	Eureka WWTP UV Facility Project	5/31/2026	50%	Montgomery Township Municipal Sewer Authority	CKS Engineers

COMPLETED CONTRACTS >\$50,000 (Within Past Year As Prime/Sub)

\$ 451,245.00	Upper St Albans Stormwater	7/1/2025	100%	Newtown Square Township	Pennonni
\$ 675,720.00	Fair Acres Force Main Installation	11/1/2025	100%	Middletown Township Sewer Authority	HRG
\$ 1,100,000.00	Downingtown Groundwater Treatment Bldg	1/15/2025	100%	Downingtown Water	JMR Consulting
\$ 889,988.00	1200 High Street Storm Sewer Improvements	4/30/2025	100%	Borough of Pottstown	Remmington & Vernick
\$ 623,196.00	Keokuk Road Culvert	3/31/2025	100%	Upper Providence Township	Gilmore and Associates
\$ 438,912.00	N. Warren Road Culvert Replacement	3/31/2025	100%	E. Whiteland Township	Arro Engineering
\$ 50,000.00	Residential Building Demolition	12/30/2025	100%	Swarthmore College	N/A
\$ 1,080,090.00	West Valley Road Stormwater Improvements	10/15/2025	100%	Treddyfrin Township	Brown and Caldwell
\$ 394,731.00	Fenimore Pump Station Upgrades	10/15/2025	100%	Lower Merion Township	Pennonni Engineering
\$ 644,000.00	Concord UV Light Replacemnt	11/1/2025	100%	Concord Township Sewer Authority	HRG
\$ 574,515.00	West Ashbridge street Culvert Maintenance & Repair	4/1/2025	100%	East Bradford Township, Chester County	Gilmore & Associates

LARGEST COMPLETED PROJECTS (Last 10 Years)

AMOUNT	TYPE OF WORK	COMPLETE		OWNER'S NAME & ADDRESS	ARCHITECT
\$ 5,055,023.00	Utility Water Upgrade	2020	*	DELCORA, 100 E 5th St, Chester, PA 19013	DELCORA
\$ 2,982,000.00	Berwyn Force Main Replacement	4/15/2024	*	Easttown Township	Arro Consulting
\$ 2,596,850.00	DELCORA Siphons Rehab	2019	*	DELCORA, 100 E 5th St, Chester, PA 19013	DELCORA
\$ 1,917,191.00	Reading Storm Sewer Improvements	6/1/2024	*	City of Reading	SSM Consultants & Engineers
\$ 1,755,450.00	DELCORA Pump Station Upgrades	11/1/2025	*	DELCORA, 100 E 5th Street, Chester, PA 19013	NA
\$ 1,728,907.00	Horseshoe Trail Bridge Replacement	2021	*	West Pikeland Township	E.B. Walsh & Associates
\$ 1,225,650.00	Chafont Borough Storm Sewer Improvements	2023	*	Chalfont Borough	CKS Engineering Associates
\$ 1,080,090.00	West Valley Stormwater Improvements	10/15/2025	*	Treddyfrin Township	Brown and Caldwell
\$ 998,650.00	Rose Valley Contract C - Force Main	2018	*	DELCORA, 100 E 5th St, Chester, PA 19013	DELCORA
\$ 980,450.00	Lincoln Ave Culvert Replacement	2021	*	Hatfield Borough, Montgomery County, PA	McMahon & Associates
\$ 807,490.00	Fernwood Cemetery Storm Sewer Replacement	2023	*	Upper Darby Township	MGE Associates
\$ 764,400.00	Lemon Street Forcemain Installation	2021	*	Aqua Pennsylvania Wasterwater, Inc	Entech Engineering
\$ 763,500.00	Church Street Sanitary Sewer Improvements	2022	*	DELCORA, 100 E 5th Street, Chester, PA 19013	Catania Engineering Assoc. Inc.

4/1/2026

3

2/2

JURICH, INC.**Project Professional References for Jurich, Inc.**

We take pride in successful project delivery. The majority of the projects we complete are more intricate and require extensive planning and oversight. The below contacts are a short list of references that can attest to our project delivery and company qualifications.

CONTACT	AGENCY/COMPANY	CONTACT NO/	EMAIL	REFERENCE NOTES
CHARLES HURST, PE	DELCORA	610-497-6760 X216	hurstc@delcora.org	25+ YEARS OF SUCCESSFUL PROJECT DELIVERY FOR THE AGENCY. VARIOUS DESIGN BUILD TYPE PROJECTS WITH VERY DIFFICULT/SPECIALTY ISSUES.
MIKE DISANTIS	DELCORA	610.876.5523, x264	disantism@delcora.org	25+ YEARS OF SUCCESSFUL PROJECT DELIVERY FOR THE AGENCY. VARIOUS DESIGN BUILD TYPE PROJECTS WITH VERY DIFFICULT/SPECIALTY ISSUES.
STEVE NORCINI, PE	RADNOR TOWNSHIP	610-688-5600 X130	snorcini@radnor.org	SUCCESSFUL PROJECT DELIVERY FOR THE TOWNSHIP OF VARIOUS SEWER, STORM, AND SPECIALTY PROJECTS. SATISFACTORY COMMUNITY/NEIGHBOR OUTREACH FOR PROJECT COMMUNICATION.
CHARLES CATANIA, PE	CATANIA ENGINEERS	610-532-2923	CCJCJr@cataniaengineering.com	25+ YEARS OF SUCCESSFUL PROJECT DELIVERY OF PROJECTS DESIGNED OR INSPECTED BY THIS CONSULTANT. VARIOUS DESIGN BUILD TYPE PROJECTS WITH VERY DIFFICULT/SPECIALTY ISSUES.
RUSS YERKEES	ENTECH ENGINEERING	610-636-6689	RYerkes@entecheng.com	SUCCESSFUL FORCE MAIN PROJECT DELIVERY FOR AQUA OF LARGE URBAN FORCE MAIN IMPROVEMENT. SATISFACTORY COMMUNITY/NEIGHBOR OUTREACH FOR PROJECT COMMUNICATION.
CHUCK FAULKNER, PE	PENNONI ENGINEERS	1 (215) 254-7751	CFaulkner@Pennoni.com	SUCCESSFUL SANITARY AND PUBLIC WORKS PROJECTS OVER THE YEARS THROUGHOUT THE DELAWARE VALLEY.
NED MILLER	MCMAHON ASSOCIATES	D: (484) 876-1390	imiller@mcmahonassociates.com	SUCCESSFUL SANITARY AND PUBLIC WORKS PROJECT IN URBAN ENVIRONMENT. LARGE PRECAST CULVERT AND SANITARY RECONSTRUCTION.
KRISTIN BOLDAZ, PE	EB WALSH ENGINEERS	Ph 610-903-0021	KBoldaz@ebwalshinc.com	SUCCESSFUL PROJECT DELIVERY FOR THE TOWNSHIP OF LARGE SENSITIVE CULVERT PROJECT AND ROADWAY IMPROVEMENT. SATISFACTORY ENVIRONMENTAL RESTORATION AND CONTROLS FOR DURATION OF PROJECT.
TIM BOYD, PE	EAST NORRITON PLYMOUTH WHITEMARSH JOINT SEWER AUTHORITY	610-279-5759 x11	maint1@enpwisa.org	SUCCESSFUL PROJECT DELIVERY FOR THE TOWNSHIP OF VARIOUS SEWER REPAIR PROJECTS.
MIKE SHRADER, PE	CITY OF READING	(610) 655-6121	michael.shrader@readingpa.gov	SUCCESSFUL PROJECT DELIVERY FOR THE CITY OF LARGE STORMWATER FACILITY THAT PREVIOUS CONTRACTORS FAILED TO EXECUTE.

JURICH, INC.
80 Clayton Park Drive
Glen Mills PA 19342

6

Key Personnel and Experience

President	Darrin MacMillan, M.Eng. 80 Clayton Park Drive Glen Mills PA 19342	President of Jurich, Inc. 21+ years' experience in Building/GC and 10+ years in heavy highway civil construction. Master's degree in civil engineering with concentration in construction management. Extensive experience in public, private, commercial and residential construction. Project Manager and Estimator
Vice President	Dewey Jurich Jr., P.E. 24 Turkey Hollow Rd Kennett Square PA 19348	Vice President of Jurich, Inc. 20+ year experience in heavy civil construction working in Public, Private, Institutional &. Successfully delivering projects as self-performing (\$100M+), Industrial markets, design-build, residential development (\$400M+) and GC functions. civil engineering degree. Registered Professional Engineer (PA 2013). Project Manager & Estimator. Serves a company safety and quality control coordinator
Estimator/Assist. Project Manager	Matthew Sippel	Heavy Civil Estimator and Assistant Project Manager 5+ years Heavy Construction Experience, Cost oversight, HCSS Heavy Bid, Quantity Comparison, Contract Negotiation, Specification Review
Superintendent	Tony Pimpinella	30+ Year Experience in Construction Supervises Utility Projects, Force Main, Gravity Sewer, Road Projects, Structural Concrete, Turnkey Site Work, General Construction, Experience with Projects in excess of \$15 Million
Superintendent	Philip Calabrese	20+ Year Experience in Construction Supervises Utility Projects, Road Projects Turnkey Site Work, General Construction & Demolition Projects, Master Plumber, Experience with Projects in excess of \$10 Million
Foreman	Bill Humphries	20+ Year Experience in Construction Started in general construction. Supervises Utility Projects, Site Work General Construction & Treatment Plants, Force Mains

APPRENTICESHIP TRAINING



January 19, 2024

To Whom it may Concern:

I am writing this letter to confirm and certify that JURICH, Inc.

- is a current member of Associated Builders & Contractors Eastern Pa Chapter and has access to our apprenticeship program.
- The Associated Builders & Contractors Eastern Pennsylvania Apprenticeship Trust ("ABC-EP Apprenticeship Trust") is approved and registered to operate as a Registered Apprenticeship Program by the Pennsylvania Apprenticeship Training Council ("PATC"), a department of the Pennsylvania Department of Labor and Industry and the Federal Department of Labor.

The ABC-EP Apprenticeship Trust's program identification number is PA00667005. The ABC-EP Apprenticeship Trust has been operating continuously as a bona fide, certified Apprenticeship Training Program since 1967, and has graduated students from apprentice to journeyman status since 1971 to the present.

As a member in good-standing of the Associated Builders & Contractors Eastern Pennsylvania Chapter (the "ABC-EP Chapter") JURICH, Inc. participates in and has access to apprenticeship programs administered through the ABC-EPA Apprenticeship Trust.

ABC Eastern Pa chapter to include the Keystone chapter has graduated journeymen within 3 or more of the last 5 years.

Regards,

Danielle Hart

Danielle Hart

Regional Director of Membership Services

East Norriton Office; 430 W. Germantown Pike, East Norriton, PA 19403 | 610.279.6666 Allentown Office; 894 Marcon Boulevard, Suite 110, Allentown, PA 18109 | 610.821.9686

Commonwealth of Pennsylvania



Department of Labor and Industry

Certificate of Registration

APPRENTICESHIP STANDARDS

This certifies that the organization below named has registered an apprentice training program under standards approved by the

Pennsylvania Apprenticeship and Training Council
and the

Federal Committee on Apprenticeship

in the following trade(s):

KEystone CHAPTER

Name ASSOCIATED BUILDERS & CONTRACTORS

INC.

City LANCASTER

State PENNSYLVANIA

Date February 9, 1967

Revised: 8-3-72

CARPENTER, CONSTRUCTION
ELECTRICIAN, CONSTRUCTION
BRICKLAYER

STONE WELDER

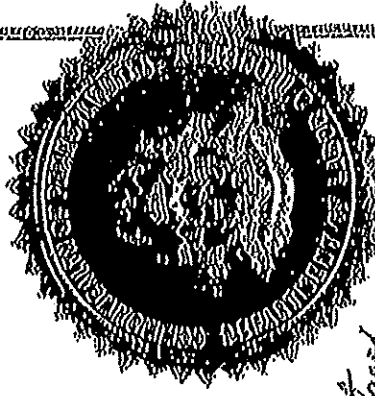
PLUMBER-PIPE FITTER

STEEL METAL WORKER,
CONSTRUCTION

REFRIGERATION & AIR
CONDITIONING MECHANIC

W. A. ...

Apprenticeship and Training Council
Department of Labor and Industry



1/2

Commonwealth of Pennsylvania



Department of Labor and Industry

Certificate of Registration

APPRENTICESHIP STANDARDS

This certifies that the organization below named has registered an apprentice training program under standards approved by the

Pennsylvania Apprenticeship and Training Council
and the
Federal Committee on Apprenticeship



in the following trade(s):

- AC & REFRIG. MECHANIC
- ASBESTOS WORKERS, CONSTR.
- CARPENTER/CONSTRUCTION WORKER
- CEMENT MASON
- ELECTRICIAN, CONSTRUCTION
- EX. EQUIP. OPERATOR
- BRICKLAYER
- PLASTER
- ZIMMER
- PRE-CAST CONCRETE SPEC
- SPRINKLERFITTER

Raymond A. Wagoner
Secretary, Pennsylvania Apprenticeship and Training Council

Department of Labor and Industry

3/7



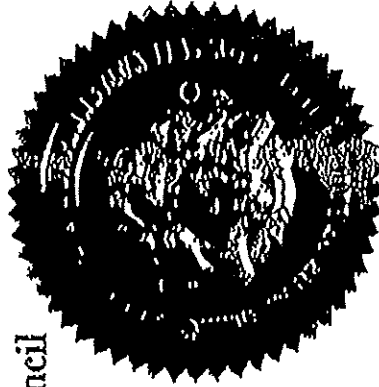
Department of Labor and Industry

Certificate of Registration

APPRENTICESHIP STANDARDS

This certifies that the organization below named has registered an apprentice training program under standards approved by the

Pennsylvania Apprenticeship and Training Council
and the
Federal Committee on Apprenticeship



in the following trade(s):

- AIR CONDITION MECHANIC
- CARPENTER
- ELECTRICIAN
- PLUMBER/PIPEFITTER
- ROOFER
- SHEET METAL WORKER
- STONE MASON
- BRICKLAYER
- SPRINKLERFITTER
- DRYWALL FINISHER

NAME: SOUTHEAST PENNSYLVANIA

City: CHEAPIER ABC, INC.

State: PENNSYLVANIA

Date: JANUARY 11, 1967

Revised: MAY 13, 1993

Raymond A. Layman
Secretary, Pennsylvania Apprenticeship and Training Council

Department of Labor and Industry

4/7

5/7

Commonwealth of Pennsylvania

DEPARTMENT OF LABOR AND INDUSTRY

Certificate of Registration

APPRENTICESHIP STANDARDS

THIS CERTIFICATE

KEYSTONE CHAPTER ABC INC.

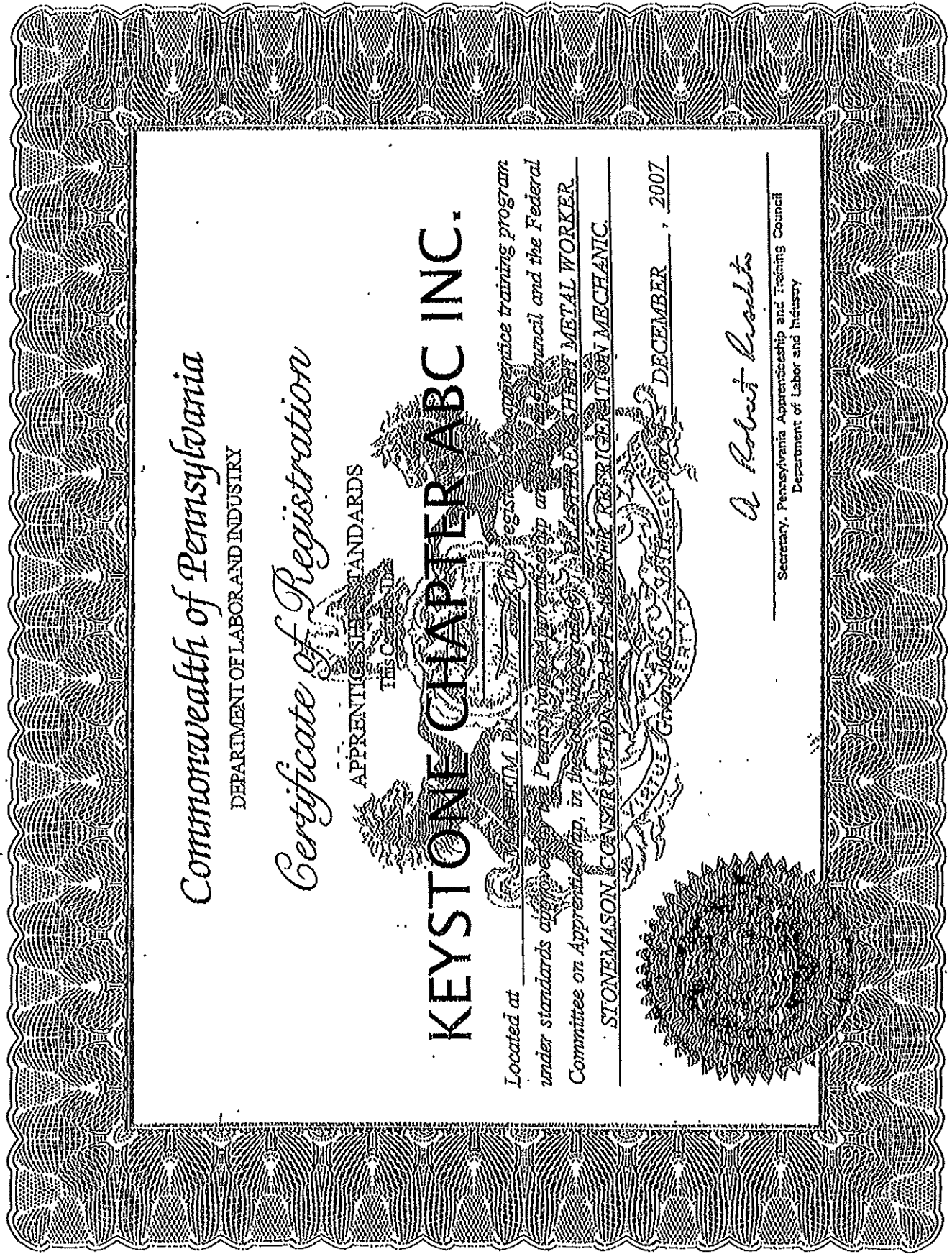
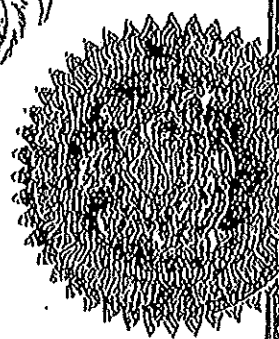
Located at _____
under standards approved by the Pennsylvania Apprenticeship and Training Council and the Federal
Committee on Apprenticeship, in the specialty area of MASTER FRESH METAL WORKER

STONE MASON CONVERSION FOR REFRIGERATION MECHANIC

DECEMBER, 2007

A Robert Kreutz

Secretary, Pennsylvania Apprenticeship and Training Council
Department of Labor and Industry



6/9

Commonwealth of Pennsylvania

DEPARTMENT OF LABOR AND INDUSTRY

Certificate of Registration

APPRENTICESHIP STANDARDS

The Certificate of

KEYSTONE CHAPTER ABC INC.

Located at 615 W. 12th St. P.O. Box 10000, Harrisburg, PA 17105-0000

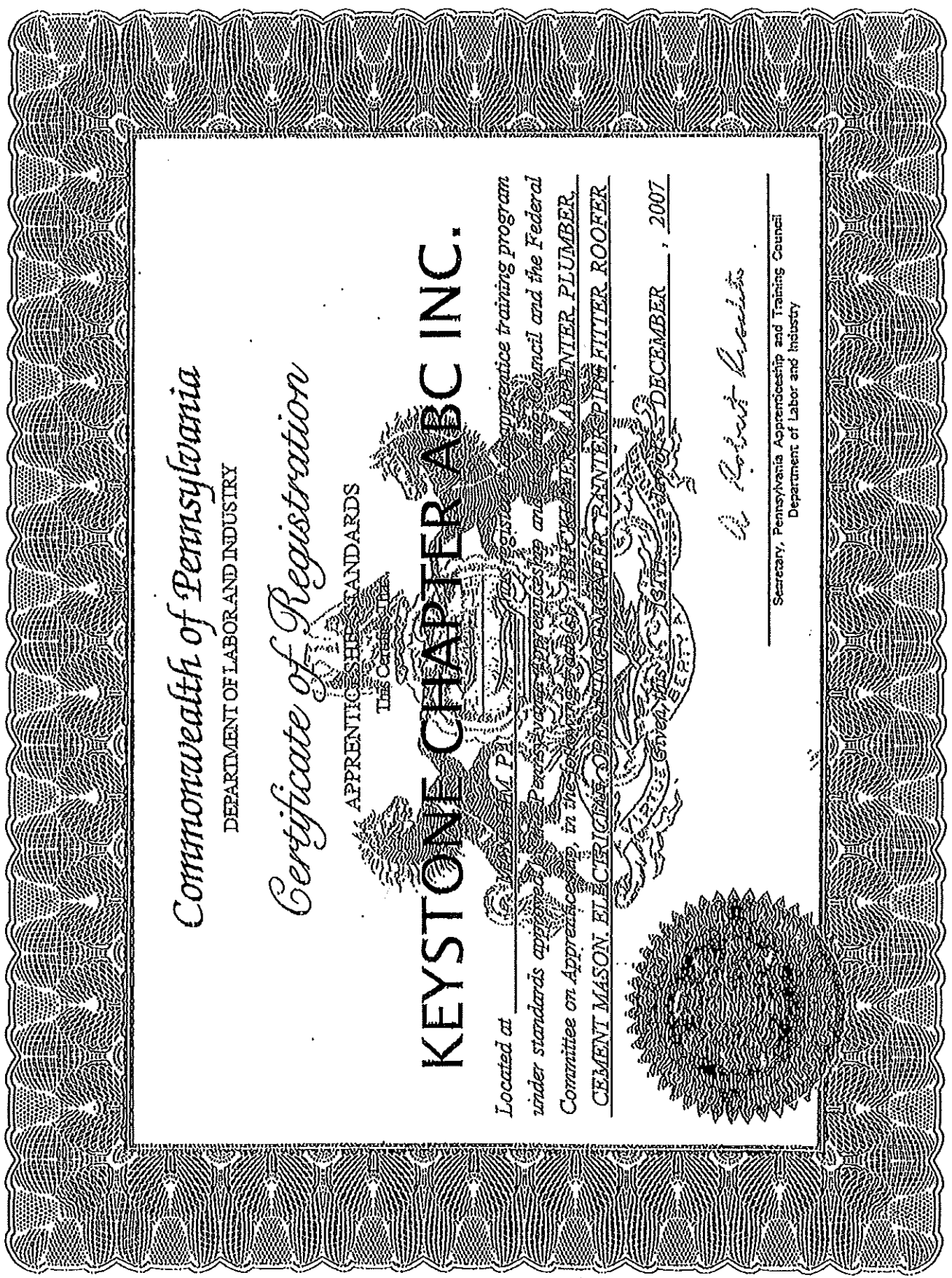
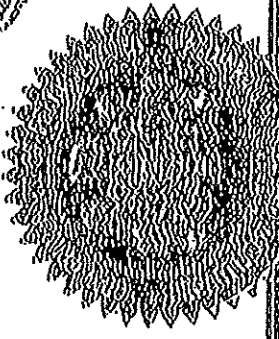
under standards approved by the Pennsylvania Apprenticeship and Training Council and the Federal Committee on Apprenticeship, in the following trade: BRICKLAYER CARPENTER PLUMBER

CEMENT MASON. ELECTRICIAN. PAINTING. MILLER. PAINTER. PIPE FITTER. ROOFER

DECEMBER, 2007

A. Robert credits

Secretary, Pennsylvania Apprenticeship and Training Council
Department of Labor and Industry



2/7

Commonwealth of Pennsylvania

DEPARTMENT OF LABOR AND INDUSTRY

Certificate of Registration

APPRENTICESHIP STANDARDS

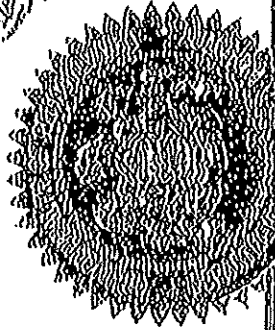
THE COMMONWEALTH OF PENNSYLVANIA

KEYSTONE CHAPTER ABC INC.

Located at _____
under standards approved by the Pennsylvania Apprenticeship and Training Council and the Federal
Committee on Apprenticeship, in the _____

STRUCTURAL STEEL WORKERS AND WELDERS UNION

DECEMBER, 2007



A Robert Rodata

Secretary, Pennsylvania Apprenticeship and Training Council
Department of Labor and Industry

Associated Builders & Contractors Keystone Chapter

This is to certify that

Rafael Cortes-Zavala

*has satisfactorily fulfilled the requirements for Graduation as prescribed by the
Apprenticeship & Craft Training Committee of the
Associated Builders & Contractors, Keystone Chapter
and is therefore awarded this Certificate of Academic Completion
for the trade of*

Construction Craft Laborer

Awarded this 20th day of May 2021



*William Lasinger
Apprenticeship Committee Chair*



*Cynthia DeWine
Director of Apprenticeship*



04/22/2026

Presiding Officer / Authority Contact
Upper Darby Township
100 Garrett Road
Upper Darby, PA 19082

Re: Petition and Application for Waiver of Apprenticeship Ratio Requirements
Project: REBID OBSERVATORY HILL RECREATION AREA PHASE I
Petitioner: **JURICH, Inc.**
Ordinance: Applicable RCO Citation 3107

Dear Presiding Officer / Authorized Reviewing Member:

On behalf of JURICH, Inc. (“Petitioner”), please find enclosed the Petition and Application for Waiver of Apprenticeship Ratio Requirements submitted pursuant to the Responsible Contractor Ordinance adopted by Upper Darby Township (“the Authority”), together with supporting Exhibits A through I.

CONFIDENTIALITY AND RESTRICTED DISTRIBUTION NOTICE

This Petition, including all attachments, exhibits, supporting data, legal arguments, workforce composition information, company operational details, and employee records contained herein, constitutes proprietary and confidential business information of JURICH, Inc. This submission is made solely for the purpose of the Authority’s review and determination of Petitioner’s waiver application in connection with the above-referenced project and ordinance.

Distribution of this Petition and its contents is strictly limited to the following authorized recipients:

- Members of the governing body (council, board of commissioners, board of supervisors, or equivalent) authorized to review and act upon the waiver application;
- The Authority’s solicitor or designated legal counsel reviewing the Petition in their official capacity;
- The Authority’s designated compliance representative (if any) identified in connection with the subject project; and
- Municipal or Authority staff members whose official duties require review of the Petition for purposes of preparing a recommendation to the governing body.

This Petition SHALL NOT be disclosed, distributed, forwarded, copied, or made available — in whole or in part, in any format — to any of the following:

- Other contractors, subcontractors, or bidders on the subject project or any other project;
- Labor unions, building trades councils, joint apprenticeship committees, or their representatives;
- Trade associations (other than as may be required by law for public comment processes);
- Members of the general public, media, or any individual or entity not identified above as an authorized recipient; or
- Any third party for any purpose unrelated to the Authority's review and determination of this waiver application.

To the extent that any portion of this Petition is subject to public disclosure requirements under the Pennsylvania Right-to-Know Law (65 P.S. § 67.101 et seq.), Petitioner asserts that the workforce composition data, employee qualification records, company operational details, and proprietary business information contained in Exhibits D, E, and G constitute confidential proprietary information and/or trade secrets exempt from disclosure under Section 708(b)(11) of the RTKL. Petitioner reserves all rights to challenge any disclosure of such information and requests advance notice of any third-party request for access to this submission.

OWNERSHIP OF FINDINGS AND DETERMINATIONS

Petitioner expressly reserves ownership of the legal arguments, factual analyses, data compilations, economic calculations, and all original work product contained in this Petition and its exhibits. Any findings, determinations, or written decisions issued by the Authority in response to this Petition are the property of JURICH, Inc. to the extent they incorporate, reference, or rely upon Petitioner's proprietary arguments and analyses. JURICH, Inc. retains the unrestricted right to use, cite, reproduce, and submit the contents of this Petition, the Authority's determination, and any related findings in support of similar waiver applications, bid protests, legal proceedings, or administrative actions before any other municipality, authority, school district, county, state agency, or court in the Commonwealth of Pennsylvania or elsewhere, without further notice to or consent from the Authority.

ENCLOSED MATERIALS

1. Petition and Application for Waiver of Apprenticeship Ratio Requirements (with Exhibits A–H)
2. Exhibit A — Keystone Research Center, Apprenticeship in Pennsylvania (March 2025)
3. Exhibit B — Documentation of Good-Faith Efforts to Recruit Registered Apprentices
4. Exhibit C — Evidence of Unavailability of Registered Apprenticeship Programs for Applicable Craft Classifications
5. Exhibit D — Supporting Data on Small Business Workforce Composition
6. Exhibit E — Relevant Worker Qualifications and Experience Summaries
7. Exhibit F — Copies of Bid Documents Reviewed for Compliance Disclosure Completeness
8. Exhibit G — Petitioner’s Company-Sponsored Journeyworker Competency and Continuing Education Program
9. Exhibit H — Additional Supporting Materials
10. Exhibit I — ABC Eastern Pennsylvania Chapter Membership Confirmation Letter (Danielle Hart, January 19, 2024)

Petitioner respectfully requests that the Authority acknowledge receipt of this submission and confirm its commitment to the confidentiality restrictions set forth above. Petitioner further requests that the Authority schedule this matter for review and determination with the Bid Documents.

Respectfully submitted,

Dewey Jurich

Authorized Representative, JURICH, Inc.

Dewey Jurich

Vice President

04/22/2026

CONFIDENTIAL — PROPERTY OF JURICH, INC. — DO NOT DISTRIBUTE

**CONFIDENTIAL — PROPERTY OF JURICH, INC. — FOR AUTHORIZED MUNICIPAL REVIEWING MEMBERS ONLY
— DO NOT DISTRIBUTE**

COMMONWEALTH OF PENNSYLVANIA
Upper Darby Township

**PETITION AND APPLICATION FOR WAIVER OF APPRENTICESHIP RATIO
REQUIREMENTS**

Submitted Pursuant to the Responsible Contractor Ordinance
Applicable Ordinance Citation / Resolution No.: 3107

Date of Submission: 04/22/2026

Petitioner / Contractor: JURICH, INC.

Principal Office Address: 80 CLAYTON PARK DRIVE GLEN MILLS, PA 19342

Contact Person: Dewey Jurich

Telephone / Email: 610-459-3236; dewey@jurichinc.com

Project / Bid Reference: REBID OBSERVATORY HILL RECREATION AREA PHASE I

Contracting Authority: Upper Darby Township

I. INTRODUCTION AND NATURE OF PETITION

Petitioner, the above-identified contractor (hereinafter 'Petitioner' or 'Contractor'), respectfully submits this Petition and Application for Waiver (hereinafter 'Petition') to the Upper Darby Township (hereinafter 'the Authority') requesting a full or partial waiver of the apprenticeship ratio requirements imposed under the Authority's Responsible Contractor Ordinance (hereinafter 'RCO' or 'the Ordinance') in connection with the above-referenced public works project.

Petitioner is a current member in good standing of the Associated Builders & Contractors Eastern Pennsylvania Chapter ("ABC Eastern PA") and has access to the ABC-EP Apprenticeship Trust's registered apprenticeship programs, including programs for Construction Craft Laborer and Cement Mason classifications (program identification number PA00667005). Notwithstanding this membership, Petitioner does not currently employ any registered apprentices in these classifications. Petitioner has been actively recruiting members of its workforce to enroll in available apprenticeship programs, and is concurrently working directly with the Pennsylvania Department of Labor & Industry Apprenticeship and Training Office to explore enrollment in existing programs or, if permitted by the Pennsylvania Apprenticeship Training Council given Petitioner's company size, the establishment of a company-sponsored registered apprenticeship program. These efforts are ongoing as of the date of this Petition.

This Petition is supported by legal authority, factual evidence, and equitable considerations that collectively demonstrate that strict enforcement of the apprenticeship ratio requirements as applied to Petitioner would: (a) impose an arbitrary and unreasonable burden on small businesses; (b) discriminate against qualified workers on the basis of age and employment

history; (c) lack a rational basis given the documented scarcity of program completers in the construction and heavy civil labor market in the Commonwealth of Pennsylvania; and (d) contravene applicable state and federal law and public policy.

In support of this Petition, Petitioner specifically invokes official data compiled by the Pennsylvania Department of Labor & Industry (PA L&I) Apprenticeship and Training Office (ATO) and analyzed by the Keystone Research Center in the report titled Apprenticeship in Pennsylvania (March 2025) (hereinafter 'the 2025 PA Apprenticeship Report'), prepared for the Pennsylvania Workforce Development Board. That report analyzes data from the U.S. Department of Labor Registered Apprenticeship Partners Information Data System (RAPIDS) and constitutes the most current official picture of the registered apprenticeship pipeline in Pennsylvania.

II. BACKGROUND AND APPLICABLE ORDINANCE PROVISIONS

Responsible Contractor Ordinances of the type enacted by numerous Pennsylvania municipalities and authorities generally require that contractors and subcontractors performing covered public works must employ workers in certain craft labor classifications at a minimum ratio of registered apprentices to journeyworkers. Typical provisions require, for example, one (1) apprentice for every three (3) to five (5) journeyworkers (or similar ratio) in each covered craft, with such apprentices being enrolled in an apprenticeship program approved and registered with the PA L&I or the United States Department of Labor, Office of Apprenticeship (USDOL OA).

As demonstrated below, the registered apprenticeship pipeline in Pennsylvania for the heavy civil and construction craft classifications most relevant to public works contracts — heavy equipment operators, construction craft laborers, truck drivers, and cement finishers — is demonstrably and severely insufficient to meet aggregate demand if apprenticeship ratios were uniformly enforced.

III. GROUNDS FOR WAIVER

A. Undue Burden on Small Business Contractors

Mandatory apprenticeship ratio requirements impose a disproportionate and inequitable burden upon small business contractors, particularly those operating in specialty trades and heavy civil work. The following factors support this ground:

1. Small contractors frequently employ a lean, highly skilled workforce and do not have the operational infrastructure, supervisory capacity, or volume of work sufficient to simultaneously train and supervise registered apprentices at the ratios demanded by the Ordinance. The staffing models of small contractors are fundamentally different from large general contractors, and a one-size-fits-all apprenticeship ratio mandate fails to account for this market reality.
2. The financial burden of enrolling workers in registered apprenticeship programs — including associated administrative costs, program fees, supplemental wage differentials, and compliance tracking — falls disproportionately on small businesses that lack dedicated human resources and compliance personnel.

3. Enforcement of apprenticeship ratios as a condition of bidding effectively disqualifies small contractors from competing for public works contracts, reducing competition, increasing costs to the public, and undermining the competitive bidding process mandated by the Municipality Authorities Act, 53 Pa. C.S. Section 5614(a), the Second Class Township Code, or applicable municipal code.
4. As the 2025 PA Apprenticeship Report acknowledges, the overwhelming majority of Pennsylvania apprenticeship completers are concentrated in a small number of large, group joint (union) programs. Specifically, the Report found that thirty (30) programs trained fifty percent (50%) of all Pennsylvania apprenticeship completers since 2014, and seventeen (17) group programs trained thirty-nine percent (39%) of all completing apprentices. This concentration means that the available pool of registered apprentices is overwhelmingly concentrated in a small number of predominantly unionized programs. While ABC Keystone and ABC Eastern Pennsylvania Chapter do maintain registered apprenticeship programs in certain craft classifications accessible to merit-shop contractors, the total completer output from these non-union programs represents a small fraction of the statewide pipeline and is wholly insufficient to satisfy aggregate RCO ratio demands if uniformly enforced across all public works contracts in the Commonwealth. For small non-union contractors who are not enrolled in an ABC chapter program, the barrier to accessing the apprenticeship pipeline remains effectively insurmountable.

B. Demonstrably Insufficient Supply of Registered Apprentices in Pennsylvania — Data from Official PA L&I / RAPIDS Records

The most powerful evidence in support of this Petition is the official statewide data on the number of registered apprenticeship program completers in the specific craft classifications most relevant to public works and heavy civil contracting. The following analysis is drawn directly from the 2025 PA Apprenticeship Report and the underlying RAPIDS dataset compiled by PA L&I.

1. Statewide Program Structure — An Overview

As of December 31, 2024, there were 1,550 Registered Apprenticeship programs in Pennsylvania across all trades and industries. Of those 1,550 programs, only 1,041 had at least one apprentice register in the preceding decade (since 2014), and only 640 programs had at least one apprentice both start and complete a program since 2014. Critically, only 221 programs statewide had trained ten (10) or more apprentices who completed the program since 2014. For the overwhelming majority of craft classifications relevant to public works contracts, the number of active, available, program-completing apprentices is a tiny fraction of what would be required to meet RCO ratio mandates across the Commonwealth.

Furthermore, the 2025 PA Apprenticeship Report documents that Pennsylvania active apprentices in 2024 equaled only 0.25% of Pennsylvania employment statewide — a figure the Report itself acknowledges is a fraction of comparable apprenticeship participation rates in peer countries such as Germany (3.0%), Australia (2.9%), England (2.5%), and Switzerland (4.2%). Pennsylvania's own official research confirms that its apprenticeship pipeline is deeply underdeveloped relative to the workforce demand.

2. Heavy Equipment Operator

For the craft classification of Heavy Equipment Operator (classified in RAPIDS as 'Operating Engineers and Other Construction Equipment Operators'), the official statewide data are as follows:

Total registrations in Pennsylvania programs since 2014: 1,346 statewide across all programs.

The two largest completing programs in this classification are the Western Pennsylvania Operating Engineers Joint Apprenticeship and Training Program (614 completers since 2014) and the Ft. Washington Operating Engineers program (270 completers since 2014). Together, these two programs account for the substantial majority of all operating engineer/heavy equipment operator completers in the entire Commonwealth during the past decade.

These figures represent total statewide completers over a ten-year period — not the number of apprentices available for hire at any given moment on any given project. Both programs are Western and Southeastern Pennsylvania programs, respectively, with limited geographic reach to municipal contractors across the Commonwealth's 67 counties. The Western PA Operating Engineers program requires a minimum of 4,000 on-the-job training hours over a four-year program. The program is union-affiliated and open only to signatory employers, meaning non-union contractors have no access to its completer pool. The program also only accepts new applicants periodically, further constraining the available supply at any given time.

Critically, the 2025 PA Apprenticeship Report identifies no registered apprenticeship program specifically for Heavy Equipment Operator that is accessible to non-union contractors outside of Western and Southeastern Pennsylvania with a meaningful completer history. ABC Keystone (Central Pennsylvania) does maintain a registered Heavy Equipment Operator apprenticeship program accessible to merit-shop contractors, and ABC Eastern Pennsylvania Chapter serves the Southeastern Pennsylvania region. In addition, per direct communication with a representative of the Pennsylvania Department of Labor & Industry, only one (1) non-union employer in the Southeastern Pennsylvania region maintains a closed (company-sponsored) registered apprenticeship program for Heavy Equipment Operator. The combined non-union completer output from these programs is negligible relative to regional demand. Non-union, open-shop contractors who are not enrolled in an ABC chapter program or affiliated with the single identified company-sponsored program have no realistic pathway to hire a registered Heavy Equipment Operator apprentice to satisfy RCO ratio requirements.

3. Construction Craft Laborer

For the craft classification of Construction Craft Laborer, the official statewide data are as follows:

Total registrations in Pennsylvania programs since 2014: 860 statewide across all programs.

The two largest completing programs are: (a) the Philadelphia-area Bricklayers and Allied Crafts program (160 completers, construction laborers classification); and (b) the Western PA Laborers JATC (101 completers since 2014). A third program, the Eastern PA Laborers Training Center, also maintains a registered program.

Across the entire Commonwealth over ten years, the total registered completer pipeline for Construction Craft Laborer is fewer than 860 registered starters — and a meaningful fraction of

those starters did not complete the program, given the statewide completion rate of approximately 61% for programs from 2008-2018. The principal programs with meaningful completer data in this classification are affiliated with LiUNA (Laborers International Union of North America) and are accessible only to union-signatory contractors or their employees. ABC Keystone (Central Pennsylvania) and ABC Eastern Pennsylvania Chapter (Southeastern Pennsylvania, with training centers in Harleysville and Allentown) do maintain registered apprenticeship programs for Construction Craft Laborer that are accessible to non-union, merit-shop contractors. However, the total completer volume from these non-union programs remains a small fraction of the statewide pipeline and is insufficient to satisfy aggregate RCO ratio demands across the region.

The geographic concentration of these programs — primarily in the Pittsburgh and Philadelphia metropolitan areas — further limits their practical utility for municipal contractors operating in Central Pennsylvania, the Lehigh Valley, the Pocono region, or rural counties where no registered Construction Craft Laborer program with a meaningful completer history exists.

4. Cement Mason / Cement Finisher

For the craft classification of Cement Mason and Concrete Finisher, the official statewide data are as follows:

Total registrations in Pennsylvania programs since 2014: 525 statewide.

The two largest completing programs are: (a) Cement Masons Local Union 592 (137 completers since 2014) and (b) Pittsburgh Cement Masons Local 526 JATC (97 completers since 2014). No other Pennsylvania cement mason apprenticeship program appears among the top 100 completing programs in the entire Commonwealth. ABC Eastern Pennsylvania Chapter does maintain a registered Cement Mason apprenticeship program accessible to merit-shop contractors, including Petitioner as a member in good standing; however, the completer volume from this program is not reflected in the top 100 completing programs statewide, indicating limited output relative to the union-affiliated programs.

These figures speak for themselves: the entire statewide pipeline of registered Cement Mason / Cement Finisher apprenticeship completers over the past decade, across all programs combined, amounts to approximately 525 registered starters. Accounting for the statewide average completion rate, actual completers are considerably fewer. Both principal programs are union joint apprenticeship programs concentrated in the Philadelphia and Pittsburgh metro areas, respectively. There is no registered, active Cement Mason / Cement Finisher apprenticeship program with a meaningful completer history serving Central Pennsylvania, Northeastern Pennsylvania, or the majority of the Commonwealth's 67 counties.

5. Truck Driver

For the craft classification of Truck Driver / Teamster, a review of the 2025 PA Apprenticeship Report's top 100 completing programs and the RAPIDS occupation data reveals that no standalone Truck Driver apprenticeship program appears among any of the top 100 completing apprenticeship programs in Pennsylvania. While the Teamsters union administers Heavy Highway apprenticeship programs that include truck driver classification as part of broader heavy and highway programs, there is no separately registered, free-standing Truck Driver

apprenticeship program accessible to open-shop or non-union contractors in Pennsylvania with a documented history of completers available for hire.

Accordingly, for Truck Driver as a standalone craft classification, it is impossible for a non-union contractor to locate and hire a registered apprentice in that classification for ratio compliance purposes because no such program produces completers accessible to non-signatory employers.

6. Summary Table — Statewide Completer Data for Subject Classifications

The following table summarizes the officially documented statewide registered apprenticeship data for the craft classifications most relevant to this Petition, as extracted from the 2025 PA Apprenticeship Report (RAPIDS data through December 31, 2024):

Craft Classification	Total Starters Since 2014 (Statewide)	Top Program(s) — Completers Since 2014	Non-Union / Open-Shop Access?
Heavy Equipment Operator	1,346	W. PA Op. Engineers: 614; Ft. Washington Op. Engineers: 270	ABC Keystone; ABC Eastern PA; one (1) company-sponsored closed program (per PA L&I) --- limited completer volume
Construction Craft Laborer	860	PHL Bricklayers (laborers): 160; W. PA Laborers JATC: 101	ABC Keystone; ABC Eastern PA --- limited completer volume relative to demand
Cement Mason / Concrete Finisher	525	Cement Masons LU 592: 137; Pittsburgh Cement Masons LU 526: 97	ABC Eastern PA (Petitioner is member in good standing) — limited completer volume
Truck Driver (standalone)	Not ranked in top 100 completing programs	None identified with standalone completer history	None identified

Source: Keystone Research Center, Apprenticeship in Pennsylvania (March 2025), prepared for the Pennsylvania Workforce Development Board; analysis of U.S. DOL RAPIDS data current as of December 31, 2024.

The foregoing data establish, as a matter of documented fact and official state record, that the registered apprenticeship pipeline in Pennsylvania for these craft classifications is: (a) severely limited in total volume; (b) geographically concentrated in two metropolitan areas; (c) predominantly or exclusively accessible to union-signatory contractors; and (d) wholly inadequate to satisfy aggregate apprenticeship ratio demands if RCO requirements were uniformly enforced across all public works contracts in the Commonwealth.

No contractor — regardless of good faith efforts — can hire registered apprentices who do not exist in accessible, non-union programs in the relevant geographic market. To condition contract eligibility upon satisfaction of a ratio requirement that cannot, as a matter of documented fact, be met is arbitrary, capricious, and not rationally related to any legitimate public purpose.

C. Absence of Registered Apprenticeship Programs for Required Craft Designations

Beyond the supply-side scarcity documented above, there are numerous craft labor designations commonly encountered in public works contracts covered by RCO provisions for which no PA L&I or USDOL registered apprenticeship program exists at all. The following examples are illustrative and not exhaustive:

- Landscape Laborer / Landscape Construction Worker
- Highway / Site Laborer (general, outside union-affiliated heavy highway programs)
- Erosion and Sediment Control Installer
- Demolition Worker (non-structural)
- Traffic Control / Flagger
- Pipe Layer (gravity and pressure mainline, outside union programs)
- Utility Locating Technician
- Stormwater Management Installer
- Turf and Green Space Maintenance Worker
- Other heavy civil and site improvement classifications as applicable to the subject project

Consistent with the findings of the 2025 PA Apprenticeship Report — which identifies 509 of the 1,550 registered Pennsylvania programs as having had no apprentice register since 2014, and notes that 419 programs have had registrants but no completers — the nominal existence of a registered program number in RAPIDS does not equate to a functioning, accessible pipeline of apprentice candidates for hire. Where no apprentice has registered in a program in a decade, the program is functionally nonexistent for workforce supply purposes.

Where no registered apprenticeship program exists for a particular craft designation under Pennsylvania or federal law, it is legally impossible for an employer to comply with an apprenticeship ratio mandate for that classification. It would be manifestly unreasonable — and likely ultra vires — for the Authority to condition contract eligibility upon compliance with a requirement that cannot, as a matter of law and market fact, be satisfied.

D. Recency of Apprenticeship Programs — Insufficient Pipeline to Meet Demand

Even in craft categories where registered apprenticeship programs have been established under Pennsylvania or federal law, many such programs are of recent origin and have not yet produced a sufficient pipeline of enrolled and active apprentices to meet the quantity demanded by widespread RCO enforcement. The 2025 PA Apprenticeship Report documents this structural deficiency directly:

1. Pennsylvania added an average of only forty (40) new apprenticeship programs per year between 2018 and 2024 — a very modest rate of growth relative to the workforce demand that RCO requirements implicitly assume.
2. The median program length for programs registered since 2017 has been declining — many newer programs have term lengths shorter than two years. The 2025 PA Apprenticeship Report found that programs with term lengths shorter than two years had completion rates at or below the statewide average completion rate of 61%, meaning the programs most likely to be newly accessible to contractors are also the least likely to produce completers.
3. For traditional construction apprenticeship programs — which constitute the craft classifications at issue here — programs registered before 2008 had a median term length of 8,000 hours (four years). This means that a program established in 2018, for example, would only have begun producing its first full cohort of completers around 2022 or 2023, with a pipeline of only one or two graduating cohorts available as of the date of this Petition.
4. The 2025 PA Apprenticeship Report expressly acknowledges that Pennsylvania active apprentices represent only 0.25% of total Pennsylvania employment as of 2024, compared to 2.5%-4.2% in peer countries. Pennsylvania's own government concedes that its apprenticeship pipeline is operating at a fraction of adequate capacity. This is an institutional admission that mandatory ratio requirements cannot be realistically satisfied statewide.
5. The temporal mismatch between program establishment and workforce pipeline maturity means that even where programs nominally exist, they cannot supply the apprentice workforce presumed by the Ordinance. Penalizing contractors for this systemic lag — a condition entirely beyond the control of any individual contractor — is arbitrary and capricious.

E. Discrimination Against Qualified Employees Who Pre-Date Formal Apprenticeship Programs — Age Discrimination Concerns

The apprenticeship ratio requirement, as applied, has a demonstrably disparate impact upon older workers who developed their craft skills and trade knowledge through years of on-the-job experience prior to the establishment or widespread availability of formal, registered apprenticeship programs. This application raises serious concerns under the Age Discrimination in Employment Act of 1967, 29 U.S.C. Section 621 et seq. (ADEA), the Pennsylvania Human Relations Act, 43 P.S. Section 951 et seq. (PHRA), and related anti-discrimination principles.

1. Many skilled tradespeople and craft laborers currently working in the Pennsylvania market are forty (40) years of age or older and entered the workforce and developed their trade competencies at a time when apprenticeship programs in their particular craft either did not exist or were not widely accessible in their geographic region. The 2025 PA Apprenticeship Report confirms that the median age of a new apprentice in a Pennsylvania program has been between 26 and 27 years old for the entire data series — meaning the apprenticeship credential system is structurally oriented toward younger entrants. Workers who entered the trades in the 1980s, 1990s, and early 2000s had no

equivalent registered program pathways available in heavy civil and site work classifications.

2. The 2025 PA Apprenticeship Report further documents that veterans' share of apprenticeship registrants has fallen significantly since 2015 — despite veterans being among the most highly skilled and experienced segments of the construction workforce — underscoring that credential-based ratio requirements disproportionately disadvantage workers with extensive practical experience who followed non-traditional training pathways.
3. Requiring that a fixed proportion of a contractor's workforce consist of formally registered apprentices has the functional effect of disadvantaging employers who rely upon experienced older workers and incentivizing the displacement of such workers in favor of younger, newly enrolled program participants. This impact is facially neutral but practically discriminatory by age.
4. Courts have recognized that facially neutral employment practices that impose a disparate burden on workers forty (40) years of age or older may give rise to claims of disparate impact age discrimination. See *Smith v. City of Jackson*, 544 U.S. 228 (2005) (recognizing disparate impact claims under the ADEA). The Authority, as a public entity, assumes potential liability when it conditions access to public works contracts upon requirements that produce discriminatory outcomes for older workers and the employers who employ them.
5. Petitioner employs experienced craft workers whose qualifications are not in question and whose exclusion from coverage as 'journeyworkers' for ratio computation purposes — solely because they lack formal apprenticeship program credentials — reflects a credentialism that is unrelated to skill, safety, or work quality, and that arbitrarily disadvantages workers on the basis of age and work history.

F. Economic Impossibility: The Southeastern Pennsylvania Construction Market Demonstrates That Simultaneous RCO Enforcement Is Mathematically Unachievable

The foregoing supply-side analysis of the apprenticeship pipeline, when measured against the scale of public construction activity in Southeastern Pennsylvania and the number of municipalities that have enacted or are actively considering RCOs, produces an inescapable conclusion: the aggregate demand for registered apprentices implicit in uniform RCO enforcement vastly and demonstrably exceeds the entire statewide supply. This section presents that economic argument with reference to publicly documented construction spending data, standard industry labor productivity metrics, and the documented municipal landscape.

1. Scale of Public Construction Spending in the Six-County Region

The five-county region comprising Philadelphia, Bucks, Chester, Delaware, and Montgomery Counties constitutes the economic core of Southeastern Pennsylvania and one of the most active public construction markets in the Mid-Atlantic region. The following spending figures are drawn from publicly available government sources:

1. PennDOT District 6 — which covers Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties — previewed more than 81 transportation projects totaling an

estimated \$900 million in construction investment for the 2024 construction season alone. Notable projects in this season included the \$329 million I-95 CAP project in Philadelphia, the \$139 million U.S. 322/CSX bridge replacement in Delaware County, the \$116 million U.S. 1 reconstruction in Bucks County, the \$83.6 million U.S. 422 reconstruction in Montgomery County, and the \$64.7 million I-476 preservation project spanning Delaware and Montgomery Counties.

2. The DVRPC FY2025 Transportation Improvement Program (TIP) for the Pennsylvania portion of the five-county DVRPC region programs over \$8.1 billion in total project investment over the four-year period (FY2025-FY2028), an annual average of approximately \$2.03 billion per year in federally and state-programmed transportation construction. The FHWA-funded component alone totals more than \$3.9 billion over four years — approximately \$975 million per year in highway and bridge construction.
3. Statewide, PennDOT reported 1,457 active or pending construction projects totaling \$9.73 billion in 2024, with 265 construction contracts completed that year and 4,147 miles of roadway improved. Southeastern Pennsylvania captures a disproportionate share of this investment given its population density, bridge and road inventory, and concentration of federal aid eligibility.
4. These transportation figures do not include: (a) locally funded municipal construction below federal aid thresholds; (b) school district construction; (c) municipal authority projects for water, sewer, and stormwater infrastructure; (d) county-funded capital construction; or (e) SEPTA's capital program, for which the DVRPC FY2025 TIP programs an additional \$4.2 billion over four years in transit infrastructure investment. When all public and quasi-public construction categories are aggregated, total annual public construction activity in the five-county region almost certainly exceeds \$3 billion annually.

2. Standard Industry Labor Content and Implied Craft Labor Hours

Construction industry standard cost references, including RS Means Cost Data, and the Bureau of Labor Statistics construction productivity series for NAICS 237 (Heavy and Civil Engineering Construction), consistently document that labor accounts for approximately 30% to 50% of total heavy civil and site work construction cost. For highway, bridge, and heavy civil work specifically, a labor content factor of 35% to 40% is the commonly used industry benchmark.

Applying a conservative 35% labor content factor to the estimated \$975 million per year in FHWA-funded regional highway construction activity alone yields an implied annual craft labor expenditure of approximately \$341 million per year in this one funding category. At a blended prevailing wage rate of \$35 to \$45 per hour for heavy civil craft labor in Southeastern Pennsylvania — consistent with published PA L&I prevailing wage determinations and the exit wage data reported in the 2025 PA Apprenticeship Report for relevant classifications — this translates to approximately 7.6 million to 9.7 million craft labor hours per year in FHWA-funded highway construction in the five-county DVRPC region alone.

3. Implied Apprentice Demand Under a Typical RCO Ratio

A representative RCO apprenticeship ratio requirement — such as the Centre County standard of one apprentice per four journeyworkers (a 20% ratio), or the 1:3 to 1:5 ratios commonly adopted

in other jurisdictions — implies that between 17% and 25% of covered craft labor hours must be performed by registered apprentices. Applying a 20% ratio to the estimated craft labor hours above:

If 20% of craft labor hours on DVRPC-region FHWA-funded highway construction were required to be performed by registered apprentices, the implied annual demand would be approximately 1.52 million to 1.94 million registered apprentice hours per year — in this single funding category, across five counties.

At a typical apprentice annual field schedule of approximately 1,500 to 1,800 hours per year (reflecting seasonal construction schedules; the Western PA Operating Engineers program requires a minimum of 4,000 OJT hours over four years, implying approximately 1,000 hours of active field work annually), satisfying this demand in FHWA-funded work alone would require approximately 844 to 1,293 full-time active registered apprentices working exclusively in the five-county DVRPC region at any given time — for highway construction only.

4. Available Apprentice Supply vs. Implied Regional Demand

The 2025 PA Apprenticeship Report documents the total registered starters in the four craft classifications most relevant to public works contracts across the entire Commonwealth of Pennsylvania over the preceding decade (2014-2024):

Craft Classification	PA Statewide Starters (2014-2024)	Estimated Active Completers Available	Programs Accessible to Non-Union Contractors
Heavy Equipment Operator	1,346	~614 (W. PA); ~270 (Ft. Washington); union-only	ABC Keystone; ABC Eastern PA; one (1) company-sponsored closed program (per PA L&I) --- limited completer volume
Construction Craft Laborer	860	~160 (PHL); ~101 (W. PA); union-only	ABC Keystone; ABC Eastern PA --- limited completer volume relative to demand
Cement Mason / Concrete Finisher	525	~137 (LU 592); ~97 (LU 526); union-only	ABC Eastern PA (Petitioner is member in good standing) — limited completer volume
Truck Driver (standalone)	Not in top 100 programs	None documented	None identified
Combined Four Classifications	~2,731 total statewide starters over 10 years	Well under 2,000 completers statewide, all union-affiliated	ABC chapters maintain programs in laborer and operator classifications; one company-sponsored operator program identified --- combined

			non-union completer volume insufficient to meet regional demand
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Source: Keystone Research Center, Apprenticeship in Pennsylvania (March 2025); U.S. DOL RAPIDS data through December 31, 2024.

Even under the most favorable assumptions — that all 2,731 starters in these four classifications across the entire Commonwealth over ten years remained active, that all were concentrated in the five-county Southeastern Pennsylvania region, and that none dropped out or changed occupations — the complete ten-year statewide cohort --- including the limited non-union completer output from ABC chapter programs and the single identified company-sponsored operator program --- would satisfy only a fraction of the annual apprentice-hour demand implied by RCO enforcement on FHWA-funded highway construction in the DVRPC region alone. Adding municipal, school, authority, and county contracts would multiply the deficit further. The mathematical gap between supply and demand is not a matter of degree; it is structural and categorical.

5. Municipal and School District Construction — A Large and Structurally Distinct Demand Layer

The construction spending categories most directly relevant to Petitioner's firm — municipal infrastructure contracts and school district facilities projects — represent a substantial and independently significant layer of public construction demand in the five-county region that is entirely separate from and additive to the PennDOT and DVRPC transportation figures discussed above. These two categories are also the categories for which apprenticeship ratio compliance is most operationally impossible, for reasons that go beyond mere supply scarcity.

a. Municipal Construction Spending

Pennsylvania municipalities — townships, boroughs, and cities — are independent capital construction authorities responsible for local roads, stormwater systems, parks, public works facilities, and utility infrastructure. In Southeastern Pennsylvania, this municipal-level construction activity is substantial in aggregate, though dispersed across hundreds of separate contracting authorities.

According to the U.S. Census Bureau's Annual Survey of State and Local Government Finances, Pennsylvania's combined state and local direct general expenditures totaled \$158.7 billion in FY 2022. Capital outlay — the category covering physical construction — is a significant component of local government budgets nationwide. Nationally, total state and local government infrastructure expenditures reached \$463 billion in 2024, with highways and streets at \$141 billion and educational facilities at \$110 billion together accounting for more than half of all public infrastructure spending.

Pennsylvania is among the nation's largest and most active public construction markets, ranked 7th nationally in public infrastructure investment. Applying Pennsylvania's approximate 4.2% share of U.S. population and GDP to the national state-and-local construction totals yields a conservative estimate of Pennsylvania's annual local government capital construction activity in

the range of \$15 billion to \$20 billion statewide across all categories. The five-county Southeastern Pennsylvania region, which contains approximately 38% of the Commonwealth's population, generates a proportionate and likely disproportionate share of that local construction activity — conservatively \$5 to \$8 billion per year in combined local government and school construction when all categories are included.

The Pennsylvania Department of Community and Economic Development (DCED) collects mandatory annual financial reports from all municipalities through its Municipal Statistics program. While detailed capital construction sub-totals by county are not published in a single consolidated format, the aggregate picture is clear: each of the 239-plus municipalities in the five-county region independently maintains roads, stormwater infrastructure, parks, and public facilities. Even at a modest average municipal capital construction budget of \$500,000 per year per municipality, 239 municipalities generate aggregate annual municipal construction demand of approximately \$156 million per year in the region — exclusively for locally funded, locally bid work outside any federal aid program.

b. School District Construction Spending

Pennsylvania's approximately 500 school districts constitute the single largest category of locally governed public contracting authorities in the Commonwealth, and school district construction represents one of the most significant streams of public capital spending relevant to contractors performing site work, earthwork, utilities, paving, and grounds improvements.

According to PDE Annual Financial Report (AFR) data and analyses by the Commonwealth Foundation, total school district spending from all sources in Pennsylvania reached \$36.6 billion in the 2022-23 school year and grew to \$37.97 billion in 2023-24. The National Center for Education Statistics (NCES) documents that nationally, capital outlay — covering expenditures for property, buildings, and alterations completed by school district staff or contractors — accounts for approximately 10% of total public school expenditures. Applied to Pennsylvania's \$36.6 billion total, this implies approximately \$3.6 billion in annual statewide school district capital construction spending in 2022-23 alone.

The five-county region contains approximately 85 to 100 public school districts, together serving the majority of the region's 4.1 million residents. Applying the regional population share of approximately 38% to the statewide school district capital outlay figure implies annual school district capital construction activity in the five-county region in the range of \$1.3 to \$1.5 billion per year. Philadelphia's School District alone has reported an estimated \$5 billion in deferred facilities needs, a figure that signals ongoing and escalating capital expenditure demand in the region for years to come.

School district construction contracts are the quintessential work stream for small and mid-sized site contractors in Southeastern Pennsylvania: parking lot reconstruction, athletic field improvements, drainage and stormwater management, site utilities, access road and driveway paving, grounds grading, and similar scope. These projects are competitively bid under the Pennsylvania Public School Code, 24 P.S. Section 7-701 et seq., which requires award to the lowest responsible bidder. The RCO, to the extent it conditions a bidder's eligibility on apprenticeship ratio compliance, effectively narrows the field of responsible bidders for this broad class of school district site work — reducing competition and increasing costs for school districts and the taxpayers who fund them.

c. The Project-Size and Project-Duration Problem — Why Apprenticeship Is Structurally Incompatible with Municipal and School District Work

Beyond the sheer volume of demand, the most fundamental and underappreciated reason why apprenticeship ratio requirements are structurally incompatible with municipal and school district construction work is the nature of the projects themselves. Municipal and school district site work contracts are, as a class, short-duration, small-to-medium scale, sporadic in scheduling, and geographically dispersed — characteristics that are fundamentally at odds with the operational requirements of a registered apprenticeship.

1. Apprenticeship programs are designed for, and function most effectively on, large, long-duration projects that provide continuous, sustained, and varied on-the-job training over months and years. The Western PA Operating Engineers program, for example, requires a minimum of 4,000 hours of on-the-job training over a four-year period — an average of 1,000 hours per year of active field work. A municipal road resurfacing project lasting three weeks, a school district parking lot reconstruction lasting six weeks, or a stormwater pipe replacement project lasting four weeks cannot meaningfully contribute to an apprentice's required training hours in a way that advances their program progress.
2. Registered apprentices must be continuously employed and supervised by a sponsoring employer in order to accrue program hours. Short, intermittent projects of the type characterizing municipal and school district site work do not provide the continuity of employment and supervision that apprenticeship programs presuppose. A contractor who wins a series of small, disconnected projects across different municipalities cannot guarantee an apprentice continuous work — and a gap in employment disrupts apprentice program progress and employer compliance with the ratio requirement simultaneously.
3. The geographic dispersal of municipal and school district project sites across the five-county region compounds this problem. A contractor performing work across multiple townships and school districts simultaneously faces the logistical impossibility of deploying apprentices efficiently across multiple scattered project sites while maintaining ratio compliance on each individual contract. Apprentices cannot be in two places at once, and ratio requirements apply per-project, not across a contractor's entire portfolio.
4. Municipal and school district public works budgets are often project-specific, approved annually, and subject to the political and fiscal constraints of local tax bases. The result is sporadic procurement — a township bids its parking lot one year, a sidewalk repair project the next, and a storm sewer upgrade the year after. There is no predictable pipeline of sustained work sufficient to carry an apprentice through a multi-year program on the basis of one municipal client's work alone. By contrast, the large-scale, multi-year highway and infrastructure projects for which apprenticeship programs were historically designed — and on which apprenticeship ratios are most defensible — are precisely the category of work least represented in the typical small contractor's municipal and school district portfolio.
5. The U.S. Census Bureau construction spending data confirm this structural distinction. Nationally in 2024, highway and street construction reached \$141 billion — a category dominated by large, long-duration projects let by state DOTs and large county governments. Educational construction reached \$110 billion nationally — dominated by

building construction and renovation work let by school districts. The site work and civil infrastructure component of school district construction — the work most relevant to contractors like Petitioner — is a subset of that \$110 billion, predominantly consisting of smaller exterior site improvement contracts that are structurally incompatible with apprenticeship ratio enforcement.

The imposition of apprenticeship ratio requirements on municipal and school district site work contracts thus fails a fundamental rationality test: the mechanism is designed for a category of construction — large, sustained, multi-year heavy civil projects — that does not describe the work being regulated. Applying a ratio requirement calibrated for highway megaprojects to a \$300,000 school district parking lot or a \$750,000 township road improvement project is not merely impractical; it is arbitrary, because the educational benefit that apprenticeship programs are intended to provide cannot be meaningfully delivered in the compressed, sporadic timeframes of municipal and school district site work.

d. Aggregate Regional Demand Including Municipal and School District Spending

The following table summarizes the full scope of public construction demand in the five-county region, incorporating both transportation and non-transportation categories, to illustrate the complete picture of aggregate apprentice demand the RCO enforcement regime implicitly assumes can be satisfied:

Construction Category	Estimated Annual Spending — 6-County Region	Primary Sources / Basis
FHWA-Funded Highway & Bridge (DVRPC TIP)	~\$975 million/year	DVRPC FY2025 TIP; PennDOT District 6 data
State & Local Highways (non-federal aid)	~\$200-400 million/year	PennDOT statewide \$9.73B / 67 counties apportioned; local liquid fuels funding
Municipal Capital Construction (239+ authorities)	~\$156-500 million/year	DCED Municipal Statistics; ~\$500K-\$1.6M per municipality x 312 jurisdictions
School District Capital Construction (~90 districts)	~\$1.3-1.5 billion/year	NCES 10% capital outlay factor x PA \$36.6B total (PDE AFR 2022-23) x regional share
Municipal Authority Projects (water, sewer, stormwater)	~\$300-500 million/year	Census local government capital outlay; ASCE PA infrastructure data
County Capital Construction (6 counties)	~\$100-200 million/year	County capital budget estimates

TOTAL ESTIMATED ANNUAL REGIONAL DEMAND	~\$3.0 - \$4.1 billion/year	Combined estimate, all public construction categories
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Sources: DVRPC FY2025 TIP for Pennsylvania; PennDOT 2024 Results; U.S. Census Bureau Monthly Construction Spending (2024); National Center for Education Statistics Fast Facts (2021); Pennsylvania Department of Education AFR Data (2022-23); Keystone Research Center (2025); PA DCED Municipal Statistics; Commonwealth Foundation education funding analyses (2024); ASCE Pennsylvania Infrastructure Report Card.

Applying the same labor content and ratio analysis from Section F.2 and F.3 above to the full \$3.0 to \$4.1 billion annual regional construction demand — using a 35% labor content factor and a 20% apprentice ratio — yields an implied annual registered apprentice demand of approximately 1.5 million to 2.1 million apprentice hours per year across all public construction categories in the region. Satisfying this demand would require between 830 and 1,400 full-time active registered apprentices working exclusively in the five-county region at any given time, in just the four craft classifications at issue.

Against the entire statewide ten-year pipeline of approximately 2,731 registered starters in those four classifications — predominantly concentrated in union-affiliated programs geographically centered in Pittsburgh and Philadelphia, with limited non-union completer volume available through ABC chapter programs — the gap between supply and demand is not a matter of modest shortfall. It is a chasm that cannot be bridged by any action a small non-union contractor can take unilaterally, and that reveals the fundamental irrationality of applying uniform apprenticeship ratio requirements to the full breadth of public construction activity across this region.

6. The Multiplier Effect of 312-Plus Overlapping Municipal Contracting Authorities

The foregoing analysis addresses only state and federally funded transportation construction. The proliferation of RCOs at the municipal level across the five-county region multiplies the apprentice demand gap dramatically and makes compliance cumulatively impossible.

The six counties at issue contain the following approximate counts of independent municipal governments, each of which constitutes a separate contracting authority capable of enacting and enforcing its own RCO:

County	Approx. No. of Municipalities	Known RCO Adoptions
Philadelphia County	1 (consolidated city-county)	City of Philadelphia RCO — enacted
Montgomery County	~62 (townships and boroughs)	County Procurement Policy; Norristown RCO; Plymouth Township RCO; West Norriton Township RCO; additional pending

Bucks County	54 (31 townships, 23 boroughs)	County RCO enacted; Doylestown Borough RCO enacted; additional municipal adoptions ongoing
Delaware County	49 (1 city, 27 boroughs, 21 townships)	Delaware County RCO enacted; municipal-level adoptions ongoing
Chester County	~73 municipalities	West Goshen Township RCO enacted; additional adoptions ongoing
[Removed - Berks County is not in the DVRPC/PennDOT District 6 region]	~73 municipalities	County-level and municipal RCO activity ongoing
Six-County Total	Approximately 239+ independent contracting authorities	Multiple active RCOs; proliferation accelerating across all counties

Sources: PA DCED Municipal Statistics; Bucks County IDA (31 townships, 23 boroughs); Delaware County (49 incorporated municipalities); Chester County (73 municipalities per PA DCED Municipal Statistics); Montgomery County MCATO borough listings; Responsible Contracting Ordinances reference document (Econsult Solutions / Building Trades, identifying West Goshen Township, City of Philadelphia, County of Bucks, Delaware County, Montgomery County Procurement Policy, Borough of Norristown, Township of West Norriton, Township of Plymouth among adopted RCO jurisdictions in the region).

A contractor performing work simultaneously for a county authority, a township, a borough, and a school district in the same geographic area — a routine scenario for small regional contractors — could face four or more simultaneous, independent apprenticeship ratio obligations across overlapping project schedules, each requiring that a prescribed fraction of the craft workforce on each separate project consist of registered apprentices in specific classifications.

With fewer than 2,000 documented completers available in the four key craft classifications from the entire statewide apprenticeship pipeline over a decade, and with each registered apprentice capable of satisfying the ratio requirement for only one employer's contract at a time, the aggregate ratio demand across 312-plus potential contracting authorities in the five-county region is simply and provably not satisfiable. The cumulative demand for registered craft apprentices across all RCO-covered public works in this region — if all ordinances were simultaneously enforced — would require an active registered apprentice workforce that exceeds the entire Pennsylvania statewide ten-year completer pipeline many times over.

This is not a hypothetical concern. It is the direct mathematical and economic consequence of applying ratio-based mandates without reference to the actual supply characteristics of the Pennsylvania apprenticeship market. The evidence from Northampton County is instructive: that county's RCO, passed in 2018 (originally covering contracts over \$250,000, subsequently amended), generated documented instances of projects receiving only a single bid — leading a county commissioner to observe publicly that 'we couldn't get bids to build an outhouse' for a county park project. The restriction of the bidder pool to the small universe of contractors with

access to the joint apprenticeship pipeline directly produces fewer bids, less competition, and higher costs to the public — outcomes that contradict the stated purpose of responsible contracting and impose measurable harm on taxpayers.

The proliferation of RCOs across dozens of independently acting municipal authorities in Southeastern Pennsylvania, while individually well-intentioned, creates a cumulative demand for registered apprentices that no market-rational analysis can conclude is satisfiable. This economic reality constitutes an independent and compelling ground for waiver, separate from and in addition to the other legal and factual arguments presented herein.

G. The Authority's Obligation to Establish, Disclose, and Staff a Post-Award Compliance System — and Its Failure to Do So

Before the Authority may lawfully impose an apprenticeship ratio requirement as a condition of public contract eligibility, it bears three corresponding obligations that are legally and logically inseparable from the requirement itself: (1) the obligation to disclose in the bid documents every compliance standard, reporting form, verification mechanism, and performance metric against which a contractor will be measured during contract execution; (2) the obligation to designate, by name and title, a qualified municipal employee or representative with the authority and subject-matter competence to monitor, verify, and enforce the apprenticeship ratio requirement on an ongoing basis throughout the contract; and (3) the obligation to maintain and operate a documented, enforceable post-award compliance program. The Authority has not fulfilled these obligations, and that failure is itself an independent basis for granting this waiver.

1. The Legal Obligation to Include All Contract Conditions in the Bid Documents

Under Pennsylvania competitive bidding law, an invitation for bids must include all contractual terms and conditions applicable to the procurement. Title 62 Pa. C.S. Section 512(b) expressly provides that an invitation for bids 'shall include a procurement description and all contractual terms, whenever practical, and conditions applicable to the procurement.' The DGS Procurement Handbook reinforces this standard, requiring that bid documents provide clarity and definite requirements so that 'the only basis contractors have for judgment is through their reading and interpretation of the plans and specifications.' Contract conditions that materially affect a bidder's ability to price, staff, and perform a project must be included in the bid documents so that all bidders compete on identical, fully disclosed terms.

An apprenticeship ratio requirement is unambiguously a material contract condition. It directly governs workforce composition, determines which workers may be lawfully deployed, affects prevailing wage classification, and can render a contractor in breach mid-project if the ratio falls below the threshold. Under Pennsylvania law, such a condition must be fully and specifically disclosed in the invitation for bids — not merely referenced by ordinance number — so that a prospective bidder can evaluate its ability to comply, include any compliance costs in its bid, and make an informed decision about whether to submit.

The Authority is therefore required to confirm whether the bid package for the subject project includes all of the following, each of which is a prerequisite to an enforceable apprenticeship ratio requirement:

- (a) The specific apprenticeship ratio applicable to each craft classification separately, expressed as an explicit numerical requirement (e.g., one registered apprentice per four journeyworkers);
- (b) The specific form or certification by which a contractor documents initial compliance at the time of bid submission, identifying each covered craft and the apprenticeship program enrolled;
- (c) The form, frequency, and content of ongoing compliance reporting during project execution — specifying whether workforce headcounts must be submitted weekly, biweekly, monthly, or at another defined interval;
- (d) The specific documentation the contractor must provide to verify each worker's registered apprentice status — including the apprentice's name, program sponsor, RAPIDS enrollment number, current program stage, and craft classification — for each worker counted toward the ratio;
- (e) The process by which the Authority will independently verify the authenticity of each claimed apprentice's registration with PA L&I or the USDOL Office of Apprenticeship, including whether the Authority will cross-reference against the RAPIDS database;
- (f) The definition of when a ratio deficiency constitutes a contract breach, the notice procedure, the cure period, and the specific contractual remedies that will apply;
- (g) The good-faith-effort waiver procedure that is available when registered apprentices in the required classification cannot be located despite documented recruitment efforts; and
- (h) The payment withholding or other sanction mechanism the Authority will exercise if ratio compliance cannot be demonstrated during any monitoring interval.

If any of these elements is absent from the bid documents, the apprenticeship ratio requirement is insufficiently disclosed under Pennsylvania public procurement law to support enforcement as a binding contract condition. A contractor cannot be disqualified from bidding, declared in breach, or subjected to payment withholding based on a compliance obligation whose specific standards, reporting mechanics, and enforcement consequences were not made known before the bid was submitted. This is not a technical objection; it is the foundational principle of lawful competitive procurement.

2. The Absence of a Post-Award Compliance System — Contrast with the Prevailing Wage Model

Pennsylvania's Prevailing Wage Act, 43 P.S. Sections 165-1 through 165-17, and its implementing regulations at 34 Pa. Code Chapter 9, provide the appropriate model for what a lawful post-award labor compliance system looks like in the public construction context. Under that statutory framework:

1. The public body must obtain wage rates from PA L&I and include them in the contract specifications before advertising — the burden of correct pre-bid disclosure is on the public body. 43 P.S. Section 165-4; 34 Pa. Code Section 9.104.
2. Every contractor and subcontractor must submit a weekly certified payroll (Form LLC-25) to the public body under oath, documenting each worker's name, craft classification,

hours worked, wage rate, and benefits. Falsification is a criminal misdemeanor punishable by criminal penalties including fines and potential imprisonment as provided under the Act. 34 Pa. Code Section 9.201(c).

3. The 'officer of the public body charged with custody of the public funds' bears a specific, non-delegable statutory duty to review certified payrolls, verify that prevailing wages were paid before releasing payment to the contractor, and notify PA L&I of any failure. Pennsylvania courts have held this is an affirmative duty, not a passive receipt function. 34 Pa. Code Sections 9.201-9.202.
4. PA L&I's Bureau of Labor Law Compliance serves as a state enforcement backstop — investigating complaints, conducting audits, and imposing debarment for intentional violations. 43 P.S. Section 165-11(e).
5. Contractors must retain all records for at least two years and make them available to PA L&I and the public body at reasonable hours.

This five-element structure — pre-bid disclosure, weekly sworn reporting, a legally designated and responsible public officer, state enforcement, and record retention — is what makes prevailing wage compliance function as a genuine contract requirement. Pennsylvania RCOs as locally enacted have none of these elements. There is no LLC-25 equivalent for apprentice utilization. There is no PA L&I apprenticeship ratio audit program for locally-bid contracts. There is no state enforcement backstop. And as ABC Keystone has stated publicly in written comment to municipal bodies considering RCOs, the municipality 'has no way of monitoring compliance beyond the point of bidding.' That is not a dispute; it is a documented, on-the-record acknowledgment of institutional incapacity.

A contractual requirement that cannot be monitored, verified, or enforced is not a genuine contract condition. It functions exclusively as a pre-bid eligibility screen. As such, its sole practical effect is to distinguish union contractors — who are affiliated with joint apprenticeship programs and can certify program participation at the time of bid — from non-union contractors who cannot. A requirement that operates as a union-affiliation screen in the guise of a workforce development condition raises serious questions under the National Labor Relations Act's preemption doctrine, the Pennsylvania Human Relations Act's prohibition on discriminatory employment conditions, and the basic equal treatment requirements of Pennsylvania competitive bidding law.

3. Designation of a Qualified Compliance Representative — Required Information

Petitioner respectfully requires that the Authority identify, in writing and before the bid submission deadline, the following information about the individual or entity designated to administer compliance with the apprenticeship ratio requirement on this project:

1. The full name, title, and employing organization of the individual designated as the Authority's compliance representative for apprenticeship ratio monitoring;
2. Whether this individual is a municipal employee, a contracted engineer or construction manager, or a third-party compliance consultant — and if not a municipal employee, the terms of that individual's engagement;

3. The professional background, credentials, training, or experience that qualifies this individual to: (a) review and verify RAPIDS apprenticeship enrollment records; (b) assess whether a given program meets the Class A qualification standard under the Ordinance; (c) determine whether a particular worker's classification in the field corresponds to the craft classification in which they hold apprentice status; and (d) calculate and audit apprentice-to-journeyworker ratios across multiple simultaneous craft classifications on a working construction site;
4. Whether this individual has received any training from PA L&I, the USDOL Office of Apprenticeship, or any other recognized authority on the administration of registered apprenticeship program verification and compliance; and
5. The process this individual will follow to document compliance findings, resolve disputes about a particular worker's classification status, and issue notices of deficiency — and whether that process has been reduced to writing in a compliance protocol that has been formally adopted by the Authority.

These are not optional disclosures. They are prerequisites to an enforceable compliance obligation. A contractor asked to satisfy a ratio requirement, maintain documentation, and risk payment withholding or disqualification must know — before committing to the contract — who will be making compliance determinations, on what basis, with what authority, and subject to what procedural constraints. The absence of this information from the bid documents is a due process deficiency that independently requires either correction prior to bid opening or waiver of the ratio requirement for this procurement.

4. Due Process, Fair Notice, and the Obligation of Administrative Specificity

The principle that all material contract conditions must be disclosed before bid submission is grounded not only in Pennsylvania procurement law but in fundamental principles of due process that govern administrative action by public entities. A contractor who submits a bid in reliance on the bid documents as issued has a legitimate expectation that the compliance obligations affecting performance will be fully and specifically defined. Where those obligations are vague, unstated, or left to the post-award discretion of an unnamed and unqualified municipal representative, the requirement fails the minimum standard of administrative specificity necessary to sustain an adverse consequence — whether that consequence is disqualification, breach finding, payment withholding, or debarment.

For all of these reasons, Petitioner respectfully requests that, as a condition of imposing any apprenticeship ratio requirement on this project, the Authority: (a) confirm in writing that the bid documents contain complete and specific disclosure of all compliance obligations, reporting forms, verification procedures, and enforcement consequences enumerated above; (b) designate and identify in writing, by name, title, and qualifications, the individual responsible for post-award compliance monitoring; and (c) provide Petitioner with a copy of the Authority's written compliance protocol before the bid submission date. In the absence of any of these disclosures, the apprenticeship ratio requirement should be waived in its entirety for this procurement.

H. The Apprenticeship Ratio Requirement Violates Pennsylvania Competitive Bidding Law — The Allan Myers Equal Footing Doctrine and the Prohibition on Union-Preference Conditions

The most fundamental legal defect of the apprenticeship ratio requirement as applied to Petitioner is that it violates one of the oldest and most firmly established commands of Pennsylvania public procurement law: all bidders on a public construction contract must compete on equal footing under a common standard. A bid condition that places one class of contractors at a structural disadvantage — not because of their competence, experience, or financial capacity, but solely because they are not affiliated with union-sponsored apprenticeship programs — destroys the common standard that is the cornerstone of lawful competitive bidding in this Commonwealth.

1. No Obligation to Use Union Labor — An Affirmative Command to Compete Equally

Pennsylvania has never required — and no statute has ever authorized — a preference for union labor in the award of public construction contracts. There is no obligation under Pennsylvania law for any public authority, municipality, or school district to use union workers, union subcontractors, or union-affiliated training programs on any public works project. The command of law runs entirely in the opposite direction: the Pennsylvania Constitution, Article III, Section 22, requires the maintenance of a system of competitive bidding for public contracts. The Commonwealth Procurement Code, Title 62 Pa. C.S. Section 512, requires competitive sealed bidding and award to the lowest responsible bidder. The Municipality Authorities Act, 53 Pa. C.S. Section 5614(a), extends this requirement to all authority construction contracts over \$10,000. The Second Class Township Code, Third Class City Code, Borough Code, and Pennsylvania Public School Code impose parallel requirements on municipalities and school districts. None of these statutes authorizes a preference based on union affiliation.

The Pennsylvania Supreme Court articulated the foundational purpose of competitive bidding in *Yohe v. City of Lower Burrell*, 418 Pa. 23, 208 A.2d 847 (Pa. 1965) — language cited in virtually every Pennsylvania public procurement decision since: bidding requirements 'are for the purpose of inviting competition, to guard against favoritism, improvidence, extravagance, fraud and corruption in the awarding of municipal contracts, and to secure the best work or supplies at the lowest price practicable, and are enacted for the benefit of property holders and taxpayers, and not for the benefit or enrichment of bidders, and should be so construed and administered as to accomplish such purpose fairly and reasonably with sole reference to the public interest.' A bid condition that systematically excludes qualified contractors because they lack union-affiliated program participation serves the interests of affiliated contractors — the very favoritism competitive bidding law was designed to prevent.

2. Allan Myers, L.P. v. Department of Transportation (2019) — The Controlling Authority

The Pennsylvania Commonwealth Court's decision in *Allan Myers, L.P. v. Pennsylvania Department of Transportation*, 202 A.3d 205, No. 314 C.D. 2018 (Pa. Commw. Ct. January 11, 2019), decided by a full en banc panel of seven judges arising from a project in Montgomery County, is the controlling Pennsylvania precedent on this question and compels the grant of this waiver.

PennDOT issued a bid for US Route 202 improvements in Norristown, Montgomery County, requiring all contractors to execute a Project Labor Agreement (PLA) with the Philadelphia Building and Construction Trades Council, compelling them to hire craft labor exclusively through union hiring halls. The first phase of the same project had been completed on time and

under budget by a non-union contractor — the same contractor now seeking this waiver's functional equivalent. Two non-union contractors, Allan Myers, L.P. and J.D. Eckman, Inc., filed bid protests. The Commonwealth Court struck down the PLA and established the following controlling rules:

1. The purpose of competitive bidding is to place contractors on equal footing so as to promote open and fair competition. 'Where there is no common standard on which bids are based, the integrity of the competitive bidding process is violated and the purpose of competitive bidding is frustrated.'
2. The PLA violated the equal footing requirement because a non-union contractor could not use its own experienced workforce and was required to bid with an unknown workforce — introducing uncertainty that did not affect union contractors. 'Allan Myers cannot make its employees or subcontractors join a union.' See *Labor Relations Board v. Fabrication Specialists, Inc.*, 477 Pa. 23, 383 A.2d 802 (Pa. 1978) (employees have the right to join or decline to join a union).
3. Union-preference bid conditions are permissible only upon a showing of 'extraordinary circumstances' — a specific, urgent, project-level need not achievable through ordinary competitive bidding. General policy preference for union labor does not qualify. A routine public works contract, like the subject project, cannot satisfy this standard.

3. The RCO Apprenticeship Ratio Is the Functional Equivalent of the Condemned PLA

An RCO apprenticeship ratio requirement that, as a practical matter, can be satisfied only by union-signatory contractors operates identically to the PLA struck down in Allan Myers. The mechanism differs — a PLA requires hiring through union halls; an RCO requires employing workers enrolled in apprenticeship programs that, in this region and in these craft classifications, exist exclusively within the union joint apprenticeship structure. The result for the non-union contractor is the same structural impossibility: it cannot satisfy the ratio requirement using its own qualified workforce, and it cannot access the only programs that supply qualifying apprentices without accepting union affiliation that no law requires it to accept. The overwhelming majority of registered apprenticeship programs with documented completer pipelines in the relevant craft classifications in Southeastern Pennsylvania are union-affiliated. While ABC Eastern Pennsylvania Chapter maintains registered programs in certain classifications accessible to merit-shop contractors, the total non-union completer volume is negligible relative to the demand implied by uniform RCO enforcement, as documented in Exhibit C and confirmed by the 2025 PA Apprenticeship Report.

The Authority cannot distinguish this case from Allan Myers on any principled basis. There are no extraordinary circumstances. This is a routine public works contract. The equal footing doctrine applies. The apprenticeship ratio requirement, to the extent it functions as a union-preference screen, cannot stand under Pennsylvania law.

4. NLRA Preemption and the Federal Anti-Union-Preference Principle

An RCO that functions to channel public contracting toward union-affiliated contractors also raises federal preemption concerns. Under the Machinists preemption doctrine — *Lodge 76, International Association of Machinists v. Wisconsin Employment Relations Commission*, 427 U.S. 132 (1976) — state and local governments may not regulate conduct that Congress intended

to leave to the free play of economic forces in the labor-management sphere. The U.S. Supreme Court confirmed in *Chamber of Commerce v. Brown*, 554 U.S. 60 (2008), that state laws that regulate employer speech about union organizing by restricting the use of state funds are preempted by the NLRA under the Machinists preemption doctrine. An RCO functioning as a union-preference screen in a market where no non-union programs exist raises this preemption concern that the Authority should not assume it can defend.

5. Documented Market Harm: Fewer Bids, Higher Costs

The legal arguments are confirmed by documented market evidence. In Allentown, a council member reported that a municipal analysis showed two dozen companies — including holders of recent city contracts — would be ineligible under the proposed RCO. A council member opposing the ordinance stated it 'would cost the city more money.' In Northampton County, a commissioner publicly reported projects receiving only a single bid, and projects for which the county 'couldn't get bids to build an outhouse' for a routine park project. These documented outcomes are the direct consequence of a requirement that functions as a union-affiliation screen — and they are precisely what Pennsylvania competitive bidding law was enacted to prevent.

I. Petitioner's Company-Sponsored Journeyworker Competency Program Provides an Independent and Superior Basis for Waiver — Equivalent or Greater Workforce Qualification Than Registered Apprenticeship

As an independent and affirmative basis for waiver, Petitioner respectfully submits that the workforce development and quality assurance objectives underlying the Authority's Responsible Contractor Ordinance are fully satisfied — and in material respects exceeded — by Petitioner's own company-sponsored journeyworker competency and continuing education program, and by the demonstrated record of performance that this program has produced over thirty-nine years of continuous operation in the Delaware Valley construction market. Petitioner has completed in excess of 1,000 public and private construction projects throughout Southeastern Pennsylvania without a single OSHA violation, without litigation arising from workmanship or performance, and with a portfolio of letters of recommendation and commendation from public owners, engineers, and municipal authorities throughout the region who have repeatedly selected Petitioner — including for emergency response work — based on its proven workforce quality. This record constitutes the most reliable and independently verified evidence of workforce competency available. It is a record that no registered apprenticeship program can claim to produce through credential issuance alone. The apprenticeship credential that the RCO treats as the exclusive proxy for craft competency is, in this context, not a proxy for quality — it is a proxy for a credential. Petitioner's workers possess the competency. The argument that only a registered program credential can demonstrate that competency is not supported by law, is not rational as applied to Petitioner's workforce, and does not serve the Authority's legitimate public interest.

1. The RCO Conflates Credential with Competency — A False Equivalence

The fundamental premise of an RCO apprenticeship ratio requirement is that workers who have completed or are enrolled in a registered apprenticeship program are more skilled, safer, and more productive than workers who have not. Pennsylvania law has never validated this premise. No Pennsylvania court has held that apprenticeship credentials are the exclusive or legally required measure of craft worker competency for purposes of public contracting. No

Pennsylvania statute requires it. The 'responsible bidder' standard under the governing competitive bidding statutes — the Second Class Township Code, Third Class City Code, Borough Code, Municipality Authorities Act, and Pennsylvania Public School Code — is a standard of contractor qualification, not worker credentialism.

The confusion between a credential and underlying competency is not merely a theoretical problem. It has real consequences. A worker who enrolled in a registered apprenticeship program two years ago and has not completed it counts toward the RCO ratio. A worker with twenty years of continuous field experience, current safety certifications, and an active employer-maintained competency record does not. Under the RCO's framework, the less experienced, credentialed worker is preferred over the more experienced, demonstrably competent one. That outcome is not rationally related to any legitimate public interest in workforce quality, safety, or project performance. It is a credential preference masquerading as a quality standard.

2. Petitioner's Company-Sponsored Journeyworker Competency Program

Petitioner maintains a formal, documented, employer-sponsored journeyworker competency and continuing education program, supplemented by its membership in and access to the ABC Eastern PA Apprenticeship Trust's registered programs for Construction Craft Laborer and Cement Mason (hereinafter 'the Competency Program') that establishes and enforces qualification standards for all craft labor employees performing work on public and private construction projects. The Competency Program is not an informal collection of on-the-job habits. It is a structured, written program with defined standards, documented compliance records, and mandatory participation by all craft employees. Its key components include:

1. **Written Competency Standards Aligned with USDOL Occupational Standards** — The Competency Program establishes written performance and knowledge standards for each craft classification in which Petitioner employs workers, developed by reference to the U.S. Department of Labor's Occupational Information Network (O*NET) occupational competency profiles, the USDOL's published apprenticeship standards for the relevant classifications, and the BLS Occupational Employment and Wage Standards for Heavy and Civil Engineering Construction (NAICS 237). Workers are evaluated against these standards upon hire, at defined intervals, and upon assignment to new equipment types or work categories.
2. **Mandatory Continuing Education and Skills Advancement** — Unlike a registered apprenticeship program, which concludes at program graduation and may not require further formal instruction for journeyworkers, Petitioner's Competency Program requires ongoing, mandatory continuing education for all craft employees throughout their employment. Continuing education requirements include: annual refresher training in OSHA construction safety standards (29 CFR Part 1926); equipment-specific operation and safety training for each new class of equipment operated; updated training on erosion and sediment control practices, stormwater management requirements, and applicable environmental compliance standards; and periodic skills assessment to verify maintained competency across assigned craft classifications.
3. **Formal Safety Training Program Exceeding OSHA Minimums** — All Petitioner craft employees hold current OSHA 10-Hour Construction Safety and Health certification at minimum; supervisory and lead personnel hold OSHA 30-Hour certification. The

Competency Program requires annual safety training updates, jobsite-specific hazard recognition training prior to project mobilization, and documented toolbox talks on a defined recurring schedule. This safety training regimen meets or exceeds the safety education components of any registered apprenticeship program in the relevant craft classifications.

4. Equipment Certification and Operator Qualification Records — For heavy equipment operators, the Competency Program maintains documented operator qualification records for each piece of equipment by type and weight class, consistent with best practices established by the Association of Equipment Manufacturers (AEM) and the National Commission for the Certification of Crane Operators (NCCCO) standards where applicable. Equipment operators are evaluated on specific machines before assignment, and records are maintained and available for inspection.
5. Documented Work History and Competency Records — The Competency Program maintains individual competency files for each craft employee, including: verified work history in the applicable craft classification; documentation of all formal training and certification completed; equipment qualification records; safety incident history; and supervisor performance evaluations. These records are maintained in a format that can be produced to the Authority for inspection and verification — providing a level of documentation and transparency that exceeds the certification-at-bid-stage only disclosure typical of an RCO-compliant contractor's apprenticeship documentation.
6. Supervisory Oversight and Journeyworker-to-Worker Ratios — The Competency Program maintains defined supervision ratios and oversight standards for craft work performed on all projects, ensuring that experienced journeyworkers supervise and mentor less experienced crew members in a structured manner consistent with the educational objectives that apprenticeship programs seek to achieve. This mentorship occurs continuously on the job — not in a registered program structure, but with equivalent or greater practical effect on workforce skill development and job performance.

3. The Competency Program Satisfies the Public Interest Goals of the RCO

The stated public policy purposes of a Responsible Contractor Ordinance — as set forth in model RCO language adopted by municipalities across Pennsylvania — are to ensure that public construction is performed by qualified workers, that safety is maintained on public job sites, and that the workforce development goals of the Commonwealth are advanced. Petitioner's Competency Program serves every one of these purposes:

1. Workforce Qualification: All of Petitioner's craft employees meet or exceed the competency standards associated with journeyworker status in their respective classifications, as verified through the documented evaluation and training records maintained in the Competency Program. The Authority will find, upon review, that Petitioner's workforce is not less qualified than the workforce of a registered-program-compliant contractor — it is comparably or more qualified, because qualification is maintained on an ongoing basis rather than achieved at program graduation and not formally evaluated thereafter.

2. **Jobsite Safety:** Petitioner's safety record speaks directly to the adequacy of its workforce training and competency program. Over 39 years of continuous operation in the heavy civil and site construction industry, Petitioner has completed in excess of 1,000 public and private projects throughout the Delaware Valley region without a single OSHA violation. Petitioner maintains annual HAZWOPER training for field personnel, reflecting a commitment to environmental and chemical safety awareness that exceeds the basic safety components of most registered apprenticeship programs. The complete absence of OSHA violations across four decades of active construction work is a more meaningful and verifiable measure of jobsite safety performance than apprenticeship credential possession — and it is a record that Petitioner puts before the Authority with confidence. Safety compliance data of this quality is available for Authority review upon request.
3. **Workforce Development and Demonstrated Track Record of Excellence:** The proof of Petitioner's Competency Program is not a credential issued by a third-party program — it is 39 years of uninterrupted, successful operation in the Delaware Valley construction market. Petitioner has completed over 1,000 public and private projects for municipalities, school districts, authorities, and private owners throughout Philadelphia, Bucks, Chester, Delaware, Montgomery, and surrounding counties, consistently delivering work on time, within contract terms, and without legal disputes, claims, or litigation arising from workmanship or performance. Petitioner maintains a substantial portfolio of letters of recommendation and commendation from owners, engineers, and public authorities throughout the region — many of whom have called upon Petitioner for emergency and urgent-response work precisely because of the firm's established reputation for deploying a skilled, reliable, and immediately productive workforce. Emergency call selection by sophisticated public owners is not incidental — it reflects the highest form of market validation: owners who need the job done right, under pressure, choose Petitioner's workforce over others. That is a workforce development outcome that no apprenticeship credential can replicate or manufacture.

4. The Competency Program as an Affirmative Waiver Basis — Requested Formal Recognition

On the basis of the foregoing, Petitioner respectfully requests that the Authority grant a waiver of the apprenticeship ratio requirement on the affirmative ground that Petitioner's company-sponsored Journeyworker Competency Program constitutes an equivalent or superior workforce development and quality assurance system that fully satisfies the public interest objectives underlying the RCO apprenticeship requirement. Petitioner further requests that, in connection with the grant of this waiver on this basis, the Authority:

1. Review and accept Petitioner's written Competency Program documentation, attached hereto as Exhibit [] or to be provided upon request within [] days, as evidence of equivalent qualification;
2. Acknowledge in the written waiver determination that employer-sponsored journeyworker competency programs that align with USDOL craft occupational standards and include mandatory continuing education, documented safety training, and

individual employee competency records are recognized by the Authority as satisfying the public interest purposes of the RCO's apprenticeship ratio requirement;

3. Establish, or recommend to the governing body, a formal Employer Competency Program Alternative pathway as a standing waiver mechanism for future RCO-covered projects, so that similarly situated contractors with documented internal training and competency standards are not required to re-litigate this issue on every future procurement; and
4. Include in the written waiver determination a finding that conditioning public contract eligibility on formal apprenticeship program enrollment — to the exclusion of demonstrably equivalent employer-maintained competency standards — is not rationally related to the legitimate public interest in workforce quality and safety, and that the Authority does not require such a credential-only standard as a matter of its procurement policy.

Petitioner further represents that it is not passively awaiting waiver relief. Petitioner is a member in good standing of the ABC Eastern PA Chapter with access to registered apprenticeship programs in Construction Craft Laborer and Cement Mason classifications, is actively recruiting members of its workforce to participate in these programs, and is working directly with the Pennsylvania Department of Labor & Industry Apprenticeship and Training Office to evaluate pathways for enrollment in existing programs or the creation of a company-sponsored registered apprenticeship program, subject to approval by the Pennsylvania Apprenticeship Training Council. A letter from the ABC Eastern PA Chapter confirming Petitioner's membership and program access is attached as part of this submission.

Petitioner submits that this affirmative ground for waiver is the strongest and most durable basis available, because it does not ask the Authority to lower its standards — it asks the Authority to recognize that its standards are already met by a higher-performance alternative. Thirty-nine years. More than 1,000 successfully completed projects. Zero OSHA violations. No performance litigation. Annual HAZWOPER training. An employer-maintained competency program aligned with USDOL standards. Ongoing letters of commendation from public owners across the Delaware Valley. Emergency call selection by owners who require immediate, reliable, skilled deployment. These are not the credentials of a contractor whose workforce needs an apprenticeship program to demonstrate quality. These are the credentials of a contractor whose workforce quality has been demonstrated — continuously, publicly, and verifiably — by four decades of results on public and private work sites throughout this region. The credential that Petitioner's workers lack is the only thing that the RCO measures. And it is not, has never been, and should not be treated as a lawful or rational proxy for the competency that Petitioner's workforce actually possesses and has spent nearly four decades proving.

J. Selective Application of Workforce Qualification Standards — The Authority's Own "Approved Contractor" Lists Expose the Irrationality of the Apprenticeship Ratio Requirement

An independent and particularly compelling ground for waiver arises from the Authority's own established practice of maintaining lists of "qualified," "approved," or "authorized" contractors whom the Authority designates as the exclusive providers of certain categories of work performed within the public right-of-way or on municipally regulated property — without

imposing any apprenticeship ratio requirement, apprenticeship program participation, or RCO compliance on those contractors. This practice, which is common among Pennsylvania municipalities, directly contradicts the premise underlying the RCO and constitutes an admission by the Authority that apprenticeship credentials are not, in fact, necessary to ensure the quality, safety, or competency of construction and trade work performed within the Authority's jurisdiction.

1. Municipal "Approved Contractor" Lists — A Widespread Practice

Pennsylvania municipalities routinely maintain official lists of contractors who are pre-qualified, approved, or authorized to perform specific categories of work that affect the public infrastructure, public rights-of-way, or public safety. These lists are common for tree removal and maintenance within the public right-of-way (administered by municipal tree commissions or arborists), utility connections requiring excavation within the public right-of-way, sidewalk replacement and repair within the public right-of-way, driveway apron construction within the cartway, and other categories of work for which the municipality requires property owners to use a contractor from an approved list as a condition of obtaining a permit. In each case, the municipality exercises direct regulatory control over which contractors are permitted to perform the work. Property owners are not free to hire any contractor — they must select from the municipality's approved list.

2. Qualification Criteria on Approved Lists — Competency Without Apprenticeship

The qualification criteria that municipalities apply to their approved contractor lists are revealing. Taking a representative municipal tree contractor list as an example, the municipality typically requires professional certification (e.g., International Society of Arboriculture (ISA) Certified Arborist), liability insurance in a specified minimum amount (e.g., \$1,000,000 per occurrence), workers' compensation insurance as required by statute, compliance with industry safety and quality standards (e.g., ANSI Z133 Tree Safety Standards, ANSI A300 Tree Care Standards), adherence to a professional code of ethics, and demonstrated compliance with applicable PennDOT and public utility requirements for work within or adjacent to the public right-of-way. Critically, no Pennsylvania municipality of which Petitioner is aware imposes any apprenticeship requirement, apprenticeship ratio, or RCO-equivalent workforce credential mandate on contractors included in these approved lists. The municipality accepts professional certification, insurance, and demonstrated standards compliance as sufficient evidence of workforce competency.

3. The Inconsistency Is Fatal to the RCO's Rational Basis

The existence of these approved contractor lists within the same municipality that has enacted an RCO creates an irreconcilable logical inconsistency that fatally undermines the rational basis for the apprenticeship ratio requirement. If apprenticeship program participation were genuinely necessary to ensure the quality, safety, and competency of construction work performed on or adjacent to public infrastructure, the Authority could not rationally exempt an entire category of contractors performing work in the public right-of-way from that same requirement. If a tree contractor can safely and competently remove a 60-foot street tree adjacent to overhead utility lines, above underground water and sewer mains, within feet of occupied structures, and in the middle of an active public roadway — all without any apprenticeship credential — then the premise that a construction laborer performing earthwork on a public project requires an apprenticeship credential to ensure safety and competency is demonstrably irrational. The municipality's own determination that professional certification and insurance — without

apprenticeship — are sufficient to manage these risks is a binding admission that apprenticeship is not the sine qua non of workforce competency the RCO presumes it to be.

4. The Same Workers, Different Standards — The Absurd Result

The selective application of the apprenticeship requirement produces an absurd result that no rational regulatory framework would countenance: a contractor who performs excavation, grading, pipe installation, and site restoration on a privately funded project immediately adjacent to a public works project — using the same workers, the same equipment, the same techniques, and the same safety protocols — is deemed qualified without an apprenticeship credential. But if that same contractor crosses the property line to perform identical work on the publicly funded project, the contractor's workforce is suddenly deemed unqualified because it lacks the apprenticeship credential. This absurdity is compounded when the contractor in question is on the Authority's own approved list for related work in the public right-of-way. A contractor whom the Authority has affirmatively vetted, approved, and listed as qualified to perform regulated work on public infrastructure cannot rationally be deemed unqualified to perform substantially similar work on a public construction contract solely because it lacks an apprenticeship program credential.

5. The Selective Application Argument as an Independent Waiver Basis

Petitioner respectfully submits that the Authority's practice of maintaining approved contractor lists that impose no apprenticeship requirement — for work performed on or adjacent to the same public infrastructure that the RCO purports to protect — constitutes an independent and sufficient basis for waiver. The Authority cannot simultaneously maintain that: (a) apprenticeship credentials are essential to protect the public interest in quality and safety on public construction projects; and (b) apprenticeship credentials are unnecessary for contractors performing regulated work on the same public infrastructure under the Authority's own approved contractor framework. These two positions are mutually exclusive. If the Authority believes its approved-list qualification criteria are sufficient for one category of public infrastructure work, it cannot rationally require a higher credential standard for another category without articulating a specific, evidence-based justification for the distinction — a justification the Authority has not provided and, Petitioner submits, cannot provide. This argument applies not only to tree contractor lists but to every category of municipally maintained approved or qualified contractor list for which the municipality does not impose apprenticeship requirements, including utility connection contractors, sidewalk and curb contractors, right-of-way restoration contractors, and any other category of approved work.

IV. LEGAL AUTHORITIES SUPPORTING WAIVER

The following legal authorities support the grant of the requested waiver:

1. Pennsylvania Constitution, Article III, Section 22 — Requires the Commonwealth to maintain a system of competitive bidding; foundational source of the equal footing doctrine in all Pennsylvania public procurement.
2. Allan Myers, L.P. v. Pennsylvania Department of Transportation, 202 A.3d 205, No. 314 C.D. 2018 (Pa. Commw. Ct. 2019) — Controlling: bid conditions that effectively require union affiliation as a condition of competitive bidding violate Pennsylvania's competitive bidding laws absent extraordinary circumstances not present in routine public works contracting.

3. *Yohe v. City of Lower Burrell*, 418 Pa. 23, 208 A.2d 847 (Pa. 1965) — Pennsylvania Supreme Court: competitive bidding requirements guard against favoritism and must be administered with sole reference to the public interest.
4. Municipality Authorities Act, 53 Pa. C.S. Section 5614(a); Second Class Township Code; Third Class City Code; Borough Code; Pennsylvania Public School Code — Mandate competitive sealed bidding to the lowest responsible bidder; no union preference is authorized.
5. *Labor Relations Board v. Fabrication Specialists, Inc.*, 477 Pa. 23, 383 A.2d 802 (Pa. 1978) — Pennsylvania Supreme Court: employees have the right to join or decline to join a union; public contract conditions effectively compelling union affiliation conflict with this right.
6. Title 62 Pa. C.S. Section 512(b) — Invitation for bids must include all contractual terms; no evaluation criteria may be applied that are not disclosed in the invitation for bids.
7. Pennsylvania Municipalities Planning Code and applicable municipal codes — Local ordinances may not impose contract conditions conflicting with state competitive bidding requirements or imposing conditions impossible of performance.
8. Pennsylvania Human Relations Act, 43 P.S. Section 951 et seq. — Prohibits discriminatory practices in employment; relevant to disparate impact on older workers.
9. Age Discrimination in Employment Act, 29 U.S.C. Section 621 et seq. — Federal prohibition on age-based employment discrimination; *Smith v. City of Jackson*, 544 U.S. 228 (2005).
10. National Labor Relations Act, 29 U.S.C. Section 151 et seq.; Machinists preemption doctrine; *Chamber of Commerce v. Brown*, 554 U.S. 60 (2008) — Local ordinances channeling public contracting toward union-affiliated contractors through apprenticeship requirements may be preempted as regulating the labor-management sphere Congress reserved to the free play of economic forces.
11. Pennsylvania Local Government Unit Debt Act, 53 Pa. C.S. Section 8001 et seq. — Apprenticeship ratio requirements reducing the field of eligible bidders impair the competitive bidding mandate.
12. Pennsylvania Prevailing Wage Act, 43 P.S. Sections 165-1 through 165-17, and 34 Pa. Code Chapter 9 — Establishes the statutory model for post-award labor compliance; RCOs lacking equivalent enforcement infrastructure do not constitute enforceable contract conditions.
13. Rational Basis Doctrine and Equal Treatment Principles --- A municipality that maintains approved contractor lists for regulated work in the public right-of-way without imposing apprenticeship requirements cannot rationally impose such requirements on public construction contracts for substantially similar work, as the selective application defeats any rational basis for the apprenticeship mandate as a workforce competency measure.

Petitioner reserves the right to supplement this Petition with additional legal authority as circumstances may require.

V. REQUESTED RELIEF

WHEREFORE, based upon the foregoing grounds, legal authorities, and factual record, Petitioner JURICH, Inc. respectfully petitions the Authority for the following relief:

1. Full Waiver of Apprenticeship Ratio Requirements. Petitioner requests that the Authority grant a full and unconditional waiver of all apprenticeship ratio requirements imposed under the Responsible Contractor Ordinance as applied to Petitioner for the subject project, encompassing all craft labor classifications — including, without limitation, Heavy Equipment Operator, Construction Craft Laborer, Cement Mason / Cement Finisher, Truck Driver, and all other classifications employed on the project — on the grounds that: (a) the documented statewide supply of registered apprenticeship completers is insufficient as a matter of fact to satisfy the ratio mandate; (b) no registered apprenticeship program accessible to non-union contractors with a meaningful completer history exists in the relevant geographic market for the majority of applicable classifications; (c) strict enforcement of the ratio requirement as applied to Petitioner constitutes an undue burden on a small business contractor in violation of the competitive bidding principles established in *Allan Myers, L.P. v. Department of Transportation*, 202 A.3d 205 (Pa. Commw. Ct. 2019), and *Yohe v. City of Lower Burrell*, 418 Pa. 23 (Pa. 1965); and (d) enforcement of the ratio requirement under the circumstances presented herein lacks a rational basis and is arbitrary and capricious as applied.

2. Waiver for Classifications Without Accessible Non-Union Programs. Petitioner requests that the Authority grant a waiver of the apprenticeship ratio requirements for all craft labor classifications for which no PA L&I or USDOL registered apprenticeship program exists with any meaningful completer history accessible to non-union contractors in the relevant geographic market. Where no such program exists, compliance with the ratio requirement is legally and factually impossible, and conditioning contract eligibility upon an impossible condition is *ultra vires* and unenforceable as a matter of law.

3. Waiver on Grounds of Undue Burden Upon Small Business. Petitioner requests that the Authority grant a waiver of the apprenticeship ratio requirements as applied to Petitioner on grounds of undue and disproportionate burden upon a small business contractor, consistent with the Authority's discretionary authority under the Responsible Contractor Ordinance or applicable law. Petitioner's workforce model, operational capacity, project duration characteristics, and inability to absorb the administrative, supervisory, and financial burdens of ratio compliance — as documented in Exhibits D and G — establish that strict enforcement as applied to Petitioner is inequitable and not rationally related to the legitimate public interest in workforce quality.

4. Acknowledgment of Age Discrimination Concerns. Petitioner requests that the Authority acknowledge, through the grant of the waiver, that the imposition of apprenticeship ratio requirements as applied to experienced craft workers who pre-date the establishment or widespread availability of formal registered apprenticeship programs raises age discrimination concerns under the Age Discrimination in Employment Act of 1967 (29 U.S.C. § 621 et seq.) and the Pennsylvania Human Relations Act (43 P.S. § 951 et seq.) that the Authority is not prepared to assume. The apprenticeship credential requirement, as applied, has a demonstrably disparate impact upon workers forty years of age or older who developed their craft competencies through on-the-job experience at a time when no equivalent registered program

was accessible in their trade or geographic region. The Authority, as a public entity, assumes potential liability by conditioning public contract eligibility upon a requirement that produces discriminatory outcomes for older workers and the employers who employ them.

5. Disclosure of Compliance Infrastructure as a Condition of Enforcement. Prior to and as a condition of enforcing any apprenticeship ratio requirement on this or any future project, Petitioner requests that the Authority provide Petitioner with: (a) complete bid document disclosure of all compliance obligations, reporting forms, verification procedures, cure periods, and enforcement consequences; (b) the name, title, employing organization, and professional qualifications of the individual designated as the Authority's compliance representative for apprenticeship ratio monitoring; and (c) the Authority's written apprenticeship compliance protocol, formally adopted by the governing body. In the event that such disclosures cannot be made before the bid submission deadline, Petitioner requests that the apprenticeship ratio requirement be waived in its entirety for the subject procurement, on the ground that the requirement is insufficiently disclosed under 62 Pa. C.S. § 512(b) and Pennsylvania competitive bidding law to constitute an enforceable contract condition.

6. In the Alternative: Recognition of Petitioner's Registered Apprenticeship Program Participation and Employer-Sponsored Competency Program as Full Compliance with the Ordinance. In the event the Authority declines to grant a full waiver under paragraphs 1 through 5 above, Petitioner requests, in the alternative, that the Authority enter a determination recognizing that Petitioner's current membership in good standing in the Associated Builders & Contractors Eastern Pennsylvania Apprenticeship Trust (Program ID PA00667005), providing access to registered apprenticeship programs in the Construction Craft Laborer and Cement Mason classifications, together with Petitioner's documented company-sponsored Journeyworker Competency and Continuing Education Program — which is aligned with U.S. Department of Labor occupational competency standards, includes mandatory continuing education and safety training exceeding OSHA minimums, and maintains individual employee competency records — constitutes full and sufficient compliance with the workforce qualification and apprenticeship participation objectives of the Ordinance, without requiring that any specific numerical ratio of registered apprentices be employed on the project. This alternative relief is supported by the equitable principle that the Authority may not condition contract eligibility upon a standard of strict ratio compliance that is impossible of performance while simultaneously rejecting an equivalent alternative that demonstrably satisfies the Ordinance's stated public interest objectives.

7. Written Findings and Determination. Petitioner requests that the Authority issue a written determination setting forth its findings of fact and conclusions supporting the grant of the relief requested herein. Said determination shall constitute an official act of the Authority and shall be the property of JURICH, Inc. Petitioner reserves the unrestricted right to rely upon, cite, reproduce, and submit said determination and the contents of this Petition in support of similar waiver applications, bid protests, administrative proceedings, or legal actions before any municipality, authority, school district, county, state agency, or court of competent jurisdiction in the Commonwealth of Pennsylvania or elsewhere, without further notice to or consent of the Authority.

VI. CERTIFICATION

The undersigned authorized representative of Petitioner hereby certifies that the facts and representations set forth in this Petition are true and correct to the best of the undersigned's knowledge, information, and belief, and that this Petition is submitted in good faith for the purposes stated herein.

Contractor / Petitioner Name (Printed): JURICH, INC. (Dewey Jurich)

Authorized Signature: *Dewey Jurich*

Title: Vice President

Date: 04/22/2026

Attachments (as applicable):

Exhibit A — Keystone Research Center, Apprenticeship in Pennsylvania (March 2025)
[PA Workforce Development Board Report]

Exhibit B — Documentation of Good-Faith Efforts to Recruit Registered Apprentices

Exhibit C — Evidence of Unavailability of Registered Apprenticeship Programs for
Applicable Craft Classifications

Exhibit D — Supporting Data on Small Business Workforce Composition

Exhibit E — Relevant Worker Qualifications and Experience Summaries

Exhibit F — Copies of Bid Documents Reviewed for Compliance Disclosure
Completeness

Exhibit G — Petitioner's Company-Sponsored Journeyworker Competency and
Continuing Education Program — Written Program Documentation, Training Records
Summary, and Individual Employee Competency File Index

Exhibit H — Any Additional Supporting Materials

Exhibit I — ABC Eastern Pennsylvania Chapter Membership Confirmation Letter
(Danielle Hart, Regional Director of Membership Services, January 19, 2024) confirming
Petitioner's membership in good standing and access to ABC-EP Apprenticeship Trust
programs (Program ID PA00667005)

EXHIBIT A

Keystone Research Center, Apprenticeship in Pennsylvania (March 2025)

PA Workforce Development Board Report

DOCUMENT IDENTIFICATION

Title: Apprenticeship in Pennsylvania

Author: Keystone Research Center

Date: March 2025

Commissioned By: Pennsylvania Workforce Development Board, Apprenticeship and Career and Technical Education Committee

Data Source: U.S. Department of Labor Registered Apprenticeship Partners Information Database System (RAPIDS), current as of December 31, 2024, with program information provided by the Pennsylvania Apprenticeship and Training Office (ATO)

Available At: Pennsylvania Department of Labor & Industry website (pa.gov/dli)

RELEVANCE TO THIS PETITION

This report constitutes the most current official analysis of the registered apprenticeship pipeline in Pennsylvania. The Petition relies upon the following data points from this report:

- Total registered apprenticeship programs in Pennsylvania (1,550 as of December 2024)
- Programs with at least one registrant since 2014 (1,041 of 1,550)
- Programs with at least one completer since 2014 (640 of 1,550)
- Programs with 10 or more completers since 2014 (221 of 1,550)
- Statewide active apprentices as a percentage of PA employment (0.25%)
- Comparison to peer countries: Germany (3.0%), Australia (2.9%), England (2.5%), Switzerland (4.2%)
- Concentration of completers: 30 programs trained 50% of all PA completers since 2014; 17 group programs trained 39% of all completing apprentices
- Statewide completion rate of approximately 61% for programs 2008–2018
- Median age of new apprentice: 26–27 years old across the data series
- Craft-specific registration and completer data for Heavy Equipment Operator, Construction Craft Laborer, Cement Mason, and Truck Driver classifications
- Average of 40 new apprenticeship programs per year between 2018 and 2024
- Declining veteran share of apprenticeship registrants since 2015

NOTE: The full report is attached behind this cover sheet. Petitioner has highlighted the specific pages, tables, and figures referenced in the Petition for the convenience of the reviewing body.

Apprenticeship in Pennsylvania

Overview

This report was prepared for the Pennsylvania Workforce Development Board's Apprenticeship and Career and Technical Education Committee in response to their need for research transmitted in the context of understanding past and present PA investments in registered pre-apprenticeship and apprenticeship programs. This report addresses the following four central concerns:

1. Trends in programs and participation
2. Representation of historically underserved populations
3. Expansion of industries and occupations
4. Geographic analysis

An interactive version of this report is available at [🌐 ApprenticeshipReportKRC.2025](https://www.keystoneresearchcenter.com/ApprenticeshipReportKRC.2025)

Unless otherwise noted, all apprenticeship data in this report are Keystone Research Center analysis of U.S. Department of Labor Registered Apprenticeship Partners Information Database System (RAPIDS) data, current as of December 31st, 2024, with program information provided by the Pennsylvania Apprenticeship and Training Office (ATO). RAPIDS data are imperfect, but the trends offered in this report are robust and useful for understanding the state of apprenticeship in Pennsylvania. All pre-apprenticeship data are sponsor-reported and are provided by the Pennsylvania ATO. These pre-apprenticeship data cover July 1st 2023 through June 30th 2024.

Registered Apprenticeship Programs

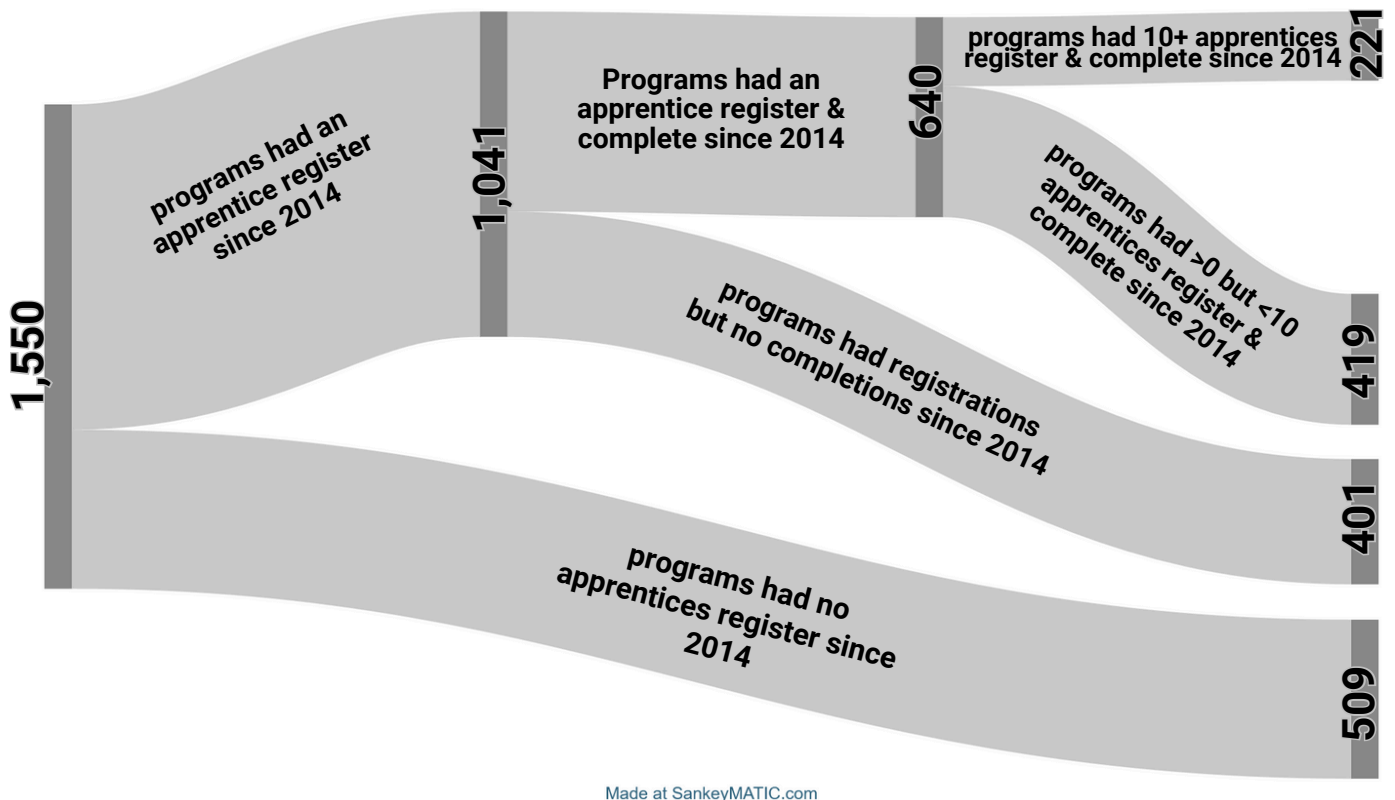
The historic level and composition of PA apprenticeship programs

Sponsors, Programs, Industry, and Type

In December 2024, there were 885 Registered Apprenticeship Program sponsors in Pennsylvania. Because sponsors can have more than one apprenticeship program, each unique occupation and sponsor combination counts as one apprenticeship program. Figure 1 shows the breakdown of the 1,550 PA programs in December 2024 based on different categories of registrants and completers.

Figure 1

Breakdown of PA Registered Apprenticeship Programs by Registrants and Completers



Made at SankeyMATIC.com

In December 2024, there were **1,550** Registered Apprenticeship programs in Pennsylvania. **1,041** of these programs have had at least one apprentice register in the past decade (since calendar year 2014). **640** programs have had at least one apprentice start and complete a program since 2014. **221** programs have trained at least ten apprentices who have completed their program since 2014.

Industry

Manufacturing and construction industry apprenticeship programs far outnumber other industries in PA and have since this data series began. In recent years, health care/social assistance, educational services, and other service (such as repair service and technician) apprenticeships have expanded. Figures 2a and 2b, the bar charts, shows the currently registered PA apprenticeship programs in each industry and when they registered for pre-2008 and in 2024.

Figure 2a

Industry Breakdown of Pennsylvania Apprenticeship Programs by Program Registration Year

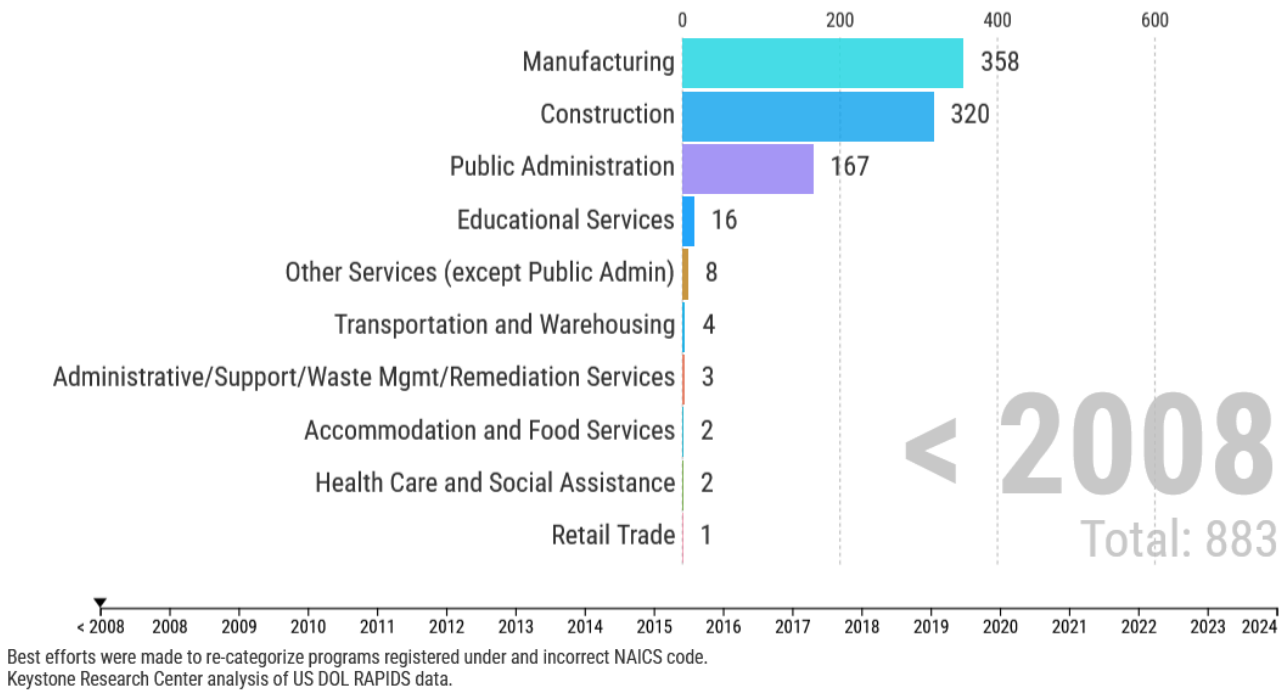
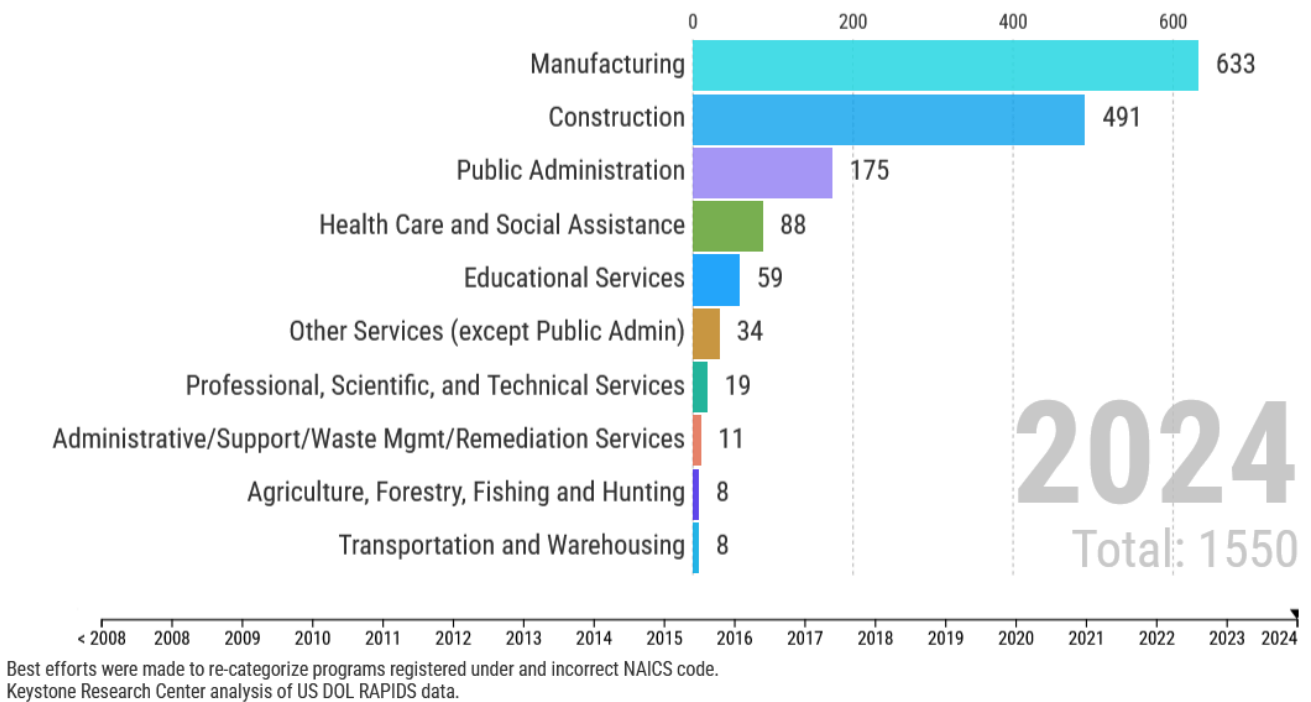


Figure 2b

Industry Breakdown of Pennsylvania Apprenticeship Programs by Program Registration Year



Of the 1,550 PA apprenticeship programs registered in year-end 2024, over half were registered before 2008. Between 2008-2024, Pennsylvania added 667 apprenticeship programs that are still registered. The year 2017 saw the most programs added that were still registered as of year-end 2024: 72. Since

2018 and through 2024, Pennsylvania has added an average of 40 programs per year that are still registered.

Table 1 shows the Industry breakdown of the programs registered since 2018. Manufacturing and Health Care and Social Assistance industry apprenticeships expanded the most. The expansion in Health Care and Social Assistance was driven by these occupations: Licensed Practical Nursing, child development specialists, various technicians, and Certified Nurse Assistants.

Table 1

Industry Breakdown of the 279 Programs Registered Since 2018

Industry:	2018	2019	2020	2021	2022	2023	2024	Total:
Agriculture, Forestry, Fishing & Hunting	3	0	0	0	0	1	0	4
Mining, Quarrying, & Oil & Gas Extraction	0	0	0	0	0	0	1	1
Utilities	0	0	0	0	0	2	1	3
Construction	9	6	5	4	3	2	6	35
Manufacturing	15	29	18	13	2	6	8	91
Wholesale Trade	0	0	0	0	0	0	0	0
Retail Trade	0	0	0	0	0	0	1	1
Transportation & Warehousing	1	0	1	0	0	2	0	4
Information	0	0	0	0	0	1	0	1
Finance & Insurance	0	0	0	0	0	1	0	1
Professional, Scientific, & Technical Services	5	0	0	2	1	4	4	16
Administrative/Support/Waste Mgmt/Remediation Services	0	0	2	1	0	3	1	7
Educational Services	7	5	5	1	2	2	6	28
Health Care & Social Assistance	0	10	13	10	15	5	11	64
Arts, Entertainment, & Recreation	0	0	0	2	0	0	0	2
Accommodation & Food Services	0	0	0	0	0	0	2	2
Other Services (except Public Admin)	5	3	2	2	0	2	2	16
Public Administration	0	1	1	1	0	0	0	3
Totals:	45	54	47	36	23	31	43	279

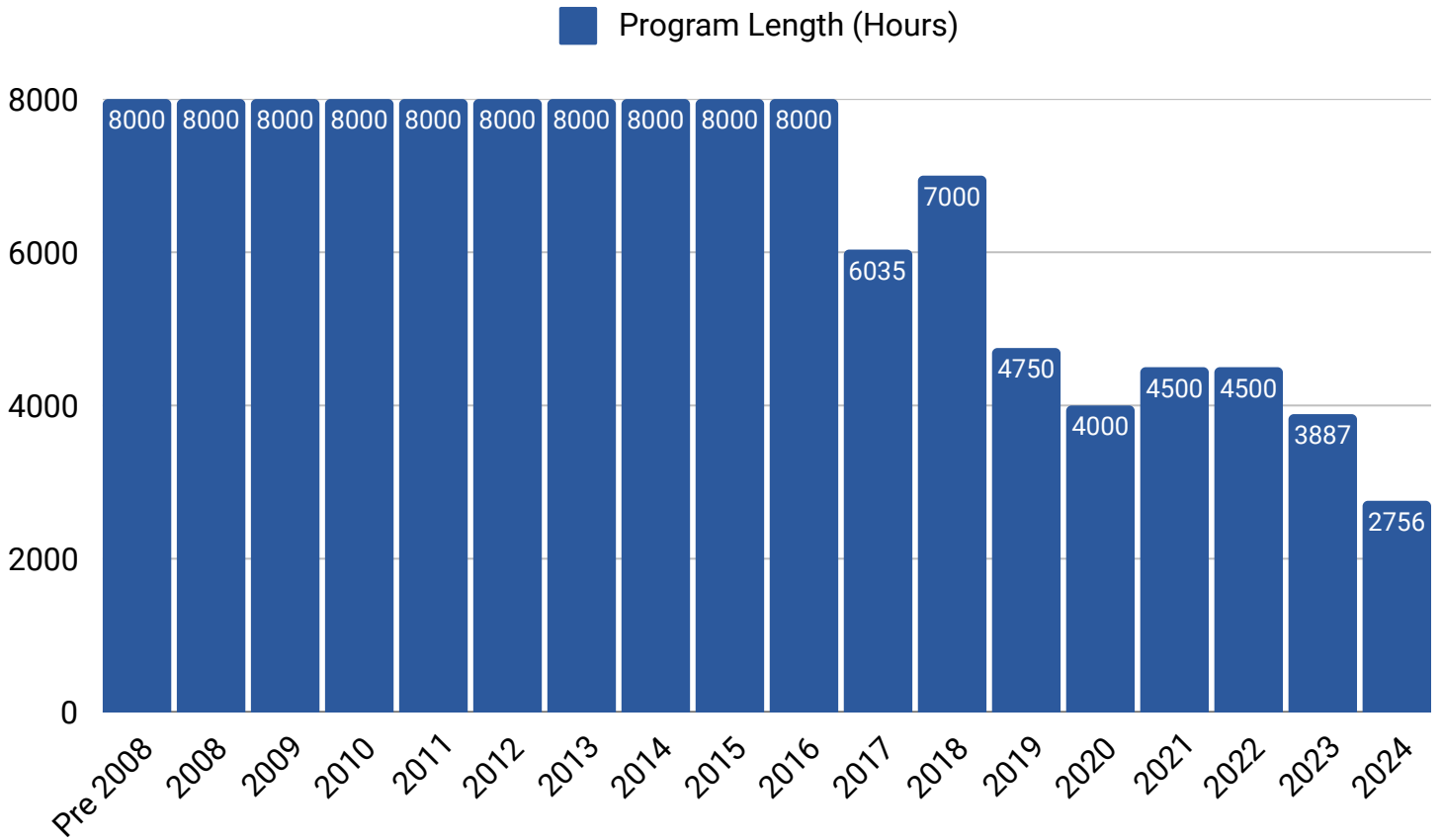
Note: Table displays programs that are still registered as of December 2024. Canceled programs are not shown.

Term Length

Of the 1,550 programs registered as of December 2024, programs that registered before 2008 had a median program length of 8000 hours, or four years. Programs with a term length of 8000 hours continued to be the median for newly registered programs for the next nine years. In 2017, many new programs that registered had a shorter median program length. Overall, newer apprenticeship programs have had, on average, a shorter term length than “traditional” apprenticeships. Figure 3 shows the median program length for programs registered before 2008, and then 2008-2024.

Figure 3

Median Program Length in Hours by Program Registration Year



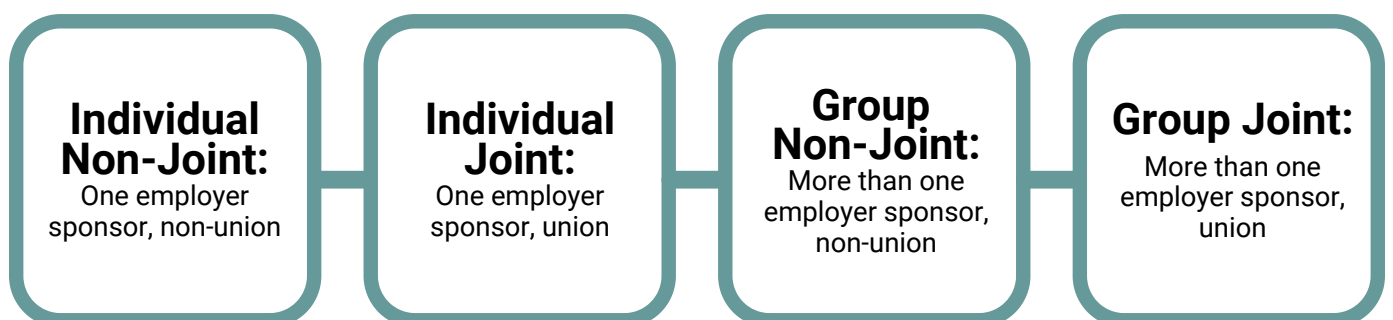
Notes: 2000 hours represents a program length of 1 year. Programs represented are those still registered as of December 2024, and that have ever registered at least one apprentice.

Program Types

Apprenticeship programs in Pennsylvania are sponsored either jointly by trade unions and employer(s) that are signatory to collective bargaining agreements or are sponsored non-jointly without union participation.

Figure 4

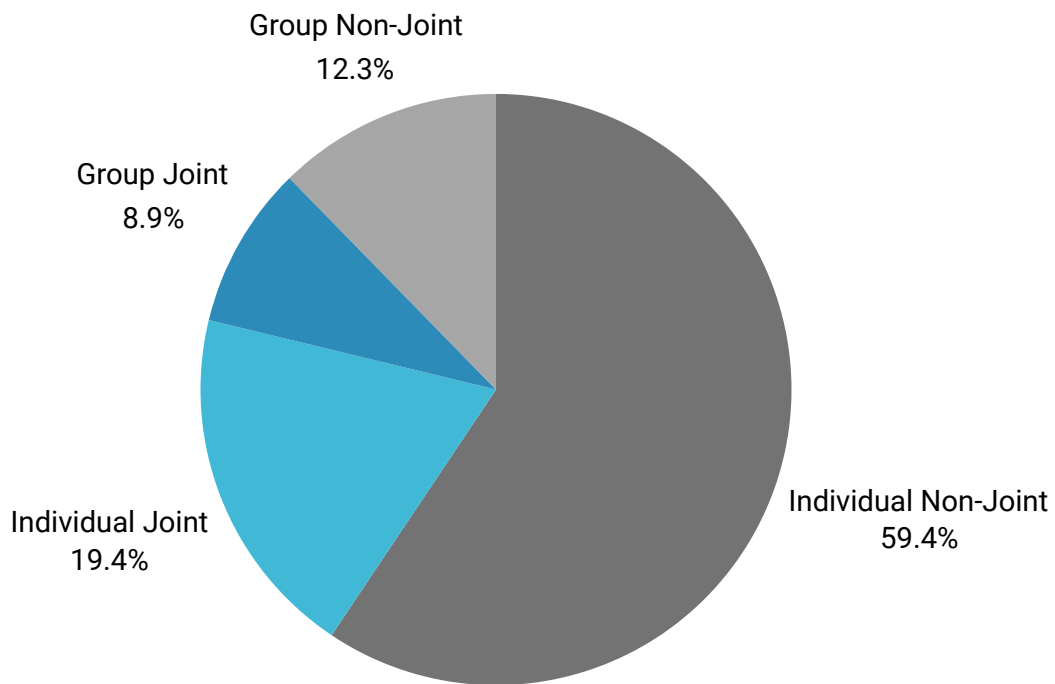
Apprenticeship Program Types



Almost 60% of currently registered PA apprenticeship programs that registered before July 2021 have individual non-joint sponsors, followed by nearly 20% with individual joint sponsorship, with group non-joint and group joint being the least represented type of program among Pennsylvania apprenticeships. Figure 5 shows the breakdown of program type of currently registered PA apprenticeship programs (registered before July 2021).

Figure 5

Registered PA Apprenticeship Programs by Type



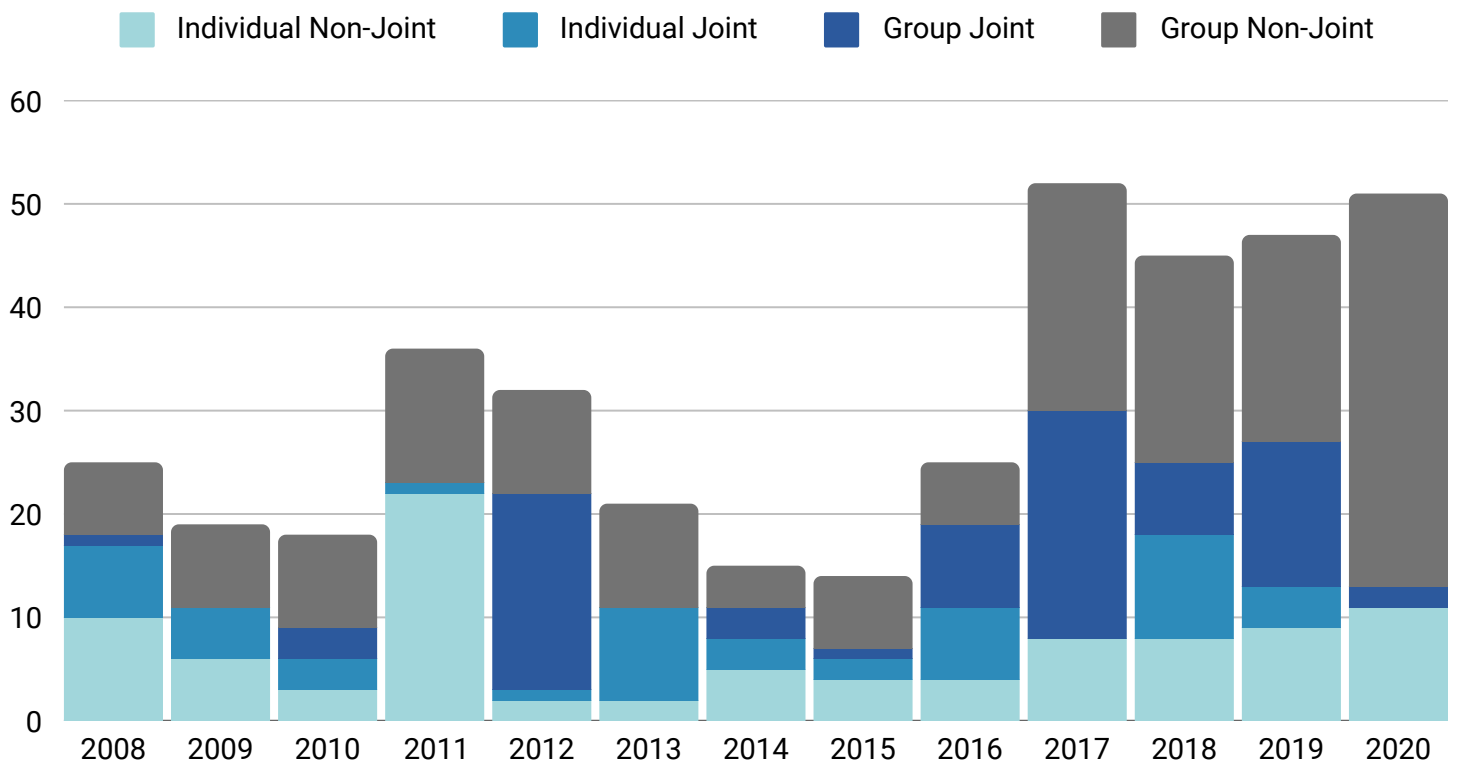
Note: Due to data availability, data shown only capture programs registered through July 2021.

Individual non-joint and individual joint programs dominate the field and account for nearly 80% of registered PA programs, but they don't necessarily train apprentices proportionally. Since 2008, nearly 60% of apprentices who completed a PA program were from a group joint program. When you exclude the "big three" programs from the analysis, (construction, public administration, and manufacturing), a different picture emerges. Figure 6 shows the yearly number of PA program completer apprentices *outside of* construction, public administration, and manufacturing programs. In 2008, 28% of PA program completers outside the big three were in group non-joint programs— a decade later, 44% finished group non-joint programs. Group programs (joint or non-joint) accounted for 32% of completers outside of the big three in 2008, yet accounted for 78% of them in 2020. Figure 6 shows the yearly completers (excluding apprentices in the big three industries) and what type of program they completed from 2008-2020.

Figure 6

Number of Completed Apprentices in PA Apprenticeship Programs, by Program Type and Exit Year

Apprentice Counts Excluding Those in Construction, Public Administration, & Manufacturing Programs



*Note: Program-type data are shown through year-end 2020 due to data availability. Apprentices were from any PA program outside of construction, public administration, and manufacturing, not just the programs still registered as of year-end 2024.

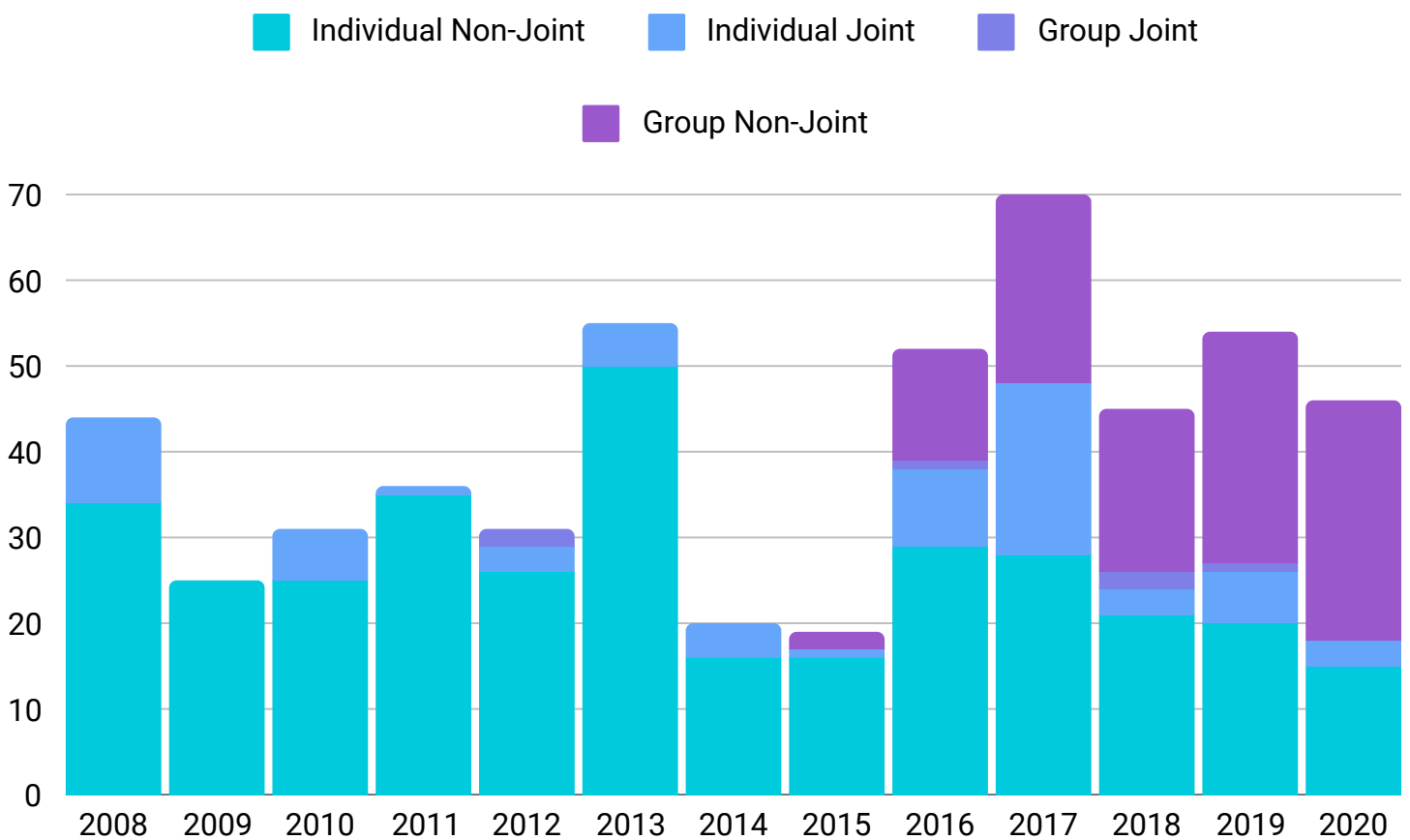
From 2014- mid 2021, newly registered PA apprenticeship programs (still registered as of December 2024) were:

- more likely to be group non-joint programs than they were historically.
- about as likely to be individual non-joint or individual joint as they were historically.
- less likely to be group joint programs than they were historically.

Figure 7 shows the number of new programs registered by year and their program type.

Figure 7

New PA Program Registrations by Program Types, 2008-2024



Note: Year-end 2020 data are shown because program-type data denoting individual/group and joint/non-joint status are unavailable after July 2021. Programs shown were among those still registered in December 2024.

Pennsylvania Apprentices

The historic level and composition of PA apprenticeship

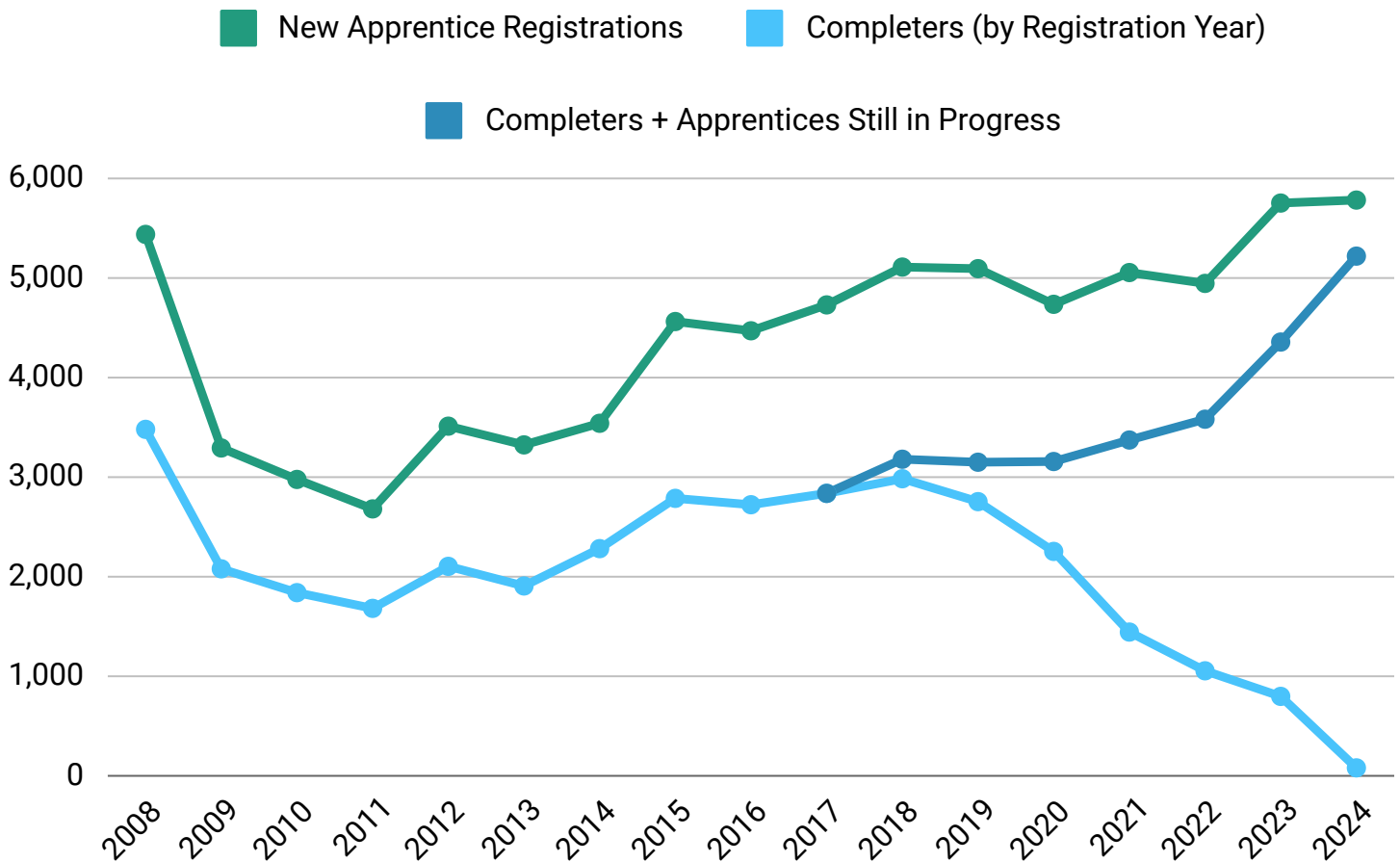
Levels, Industry, Demographics, and Occupations

Levels

Analyses of new registrations in PA programs show that Pennsylvania apprenticeship levels dropped during the Great Recession and have steadily risen in subsequent years. PA apprenticeship registrations are largely driven by construction occupations and respond quickly to business cycles. Figure 8 shows new apprentice registrations in PA programs per year, how many of those new registrants eventually completed their apprenticeship, and—starting in 2018—the count of apprentices who are still in the process of completing their programs were added to the number of completed (dark blue line). After the dip during and following the Great Recession, apprentice registrations in PA programs gradually rose and surpassed the 2008 level in 2023, despite a slight decrease during the COVID-19 recession. From 2008 to 2018, PA apprentices had a completion rate of 61%. It is too soon to estimate a completion rate for years after 2018, because many apprentices are still completing programs and can not yet be captured in a completion rate calculation.

Figure 8

Numbers of New Registrations, Completers, and In-Progress Apprentices in All PA Apprenticeship Programs, by Registration Year

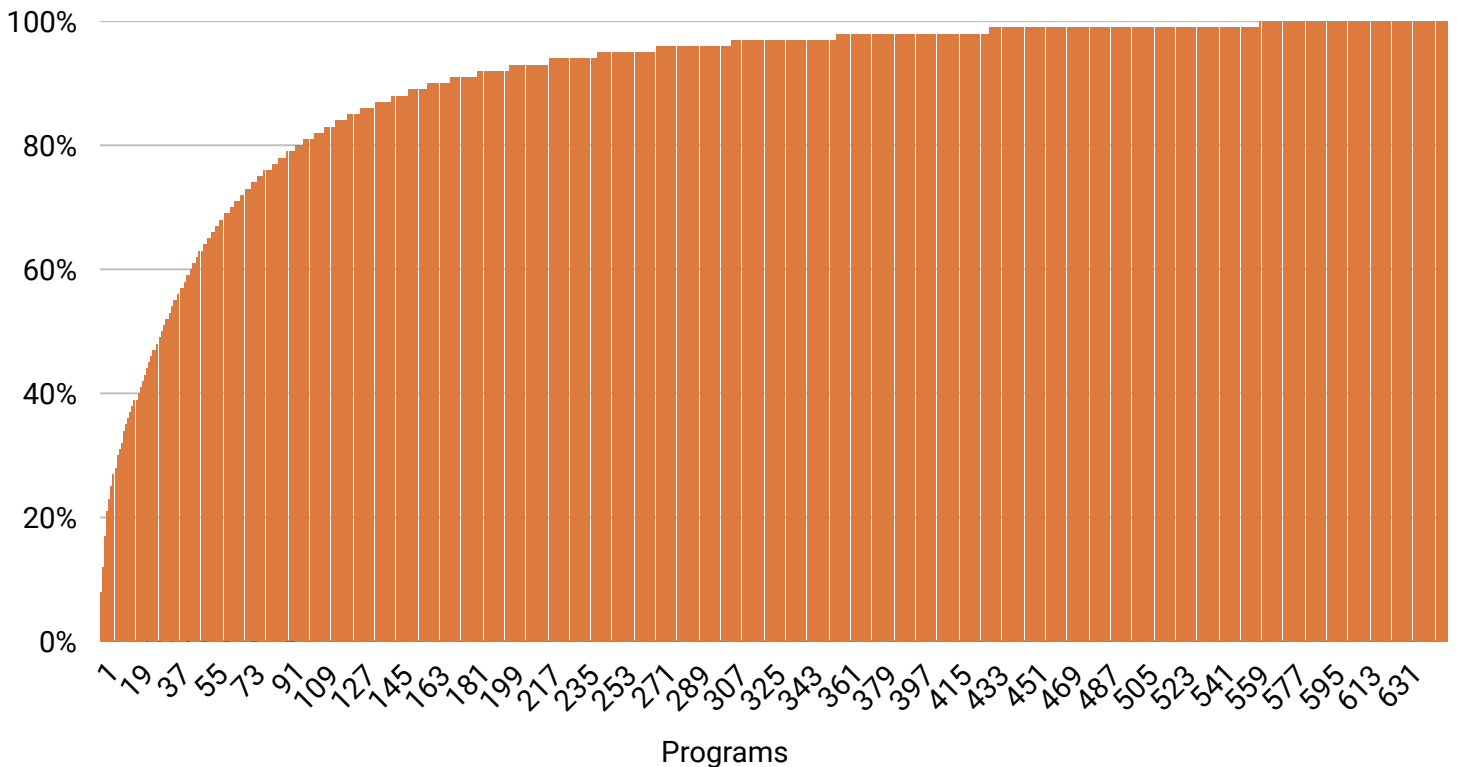


Of the 640 (see Figure 1) PA apprenticeship programs that have had at least one apprentice register and complete since 2014, 50% of the apprentices who completed were from one of only thirty programs. Figure 9 is a bar chart that shows one tiny bar for every apprenticeship program that has trained an apprentice who started and completed since 2014. The first bar on the bottom left represents the program that trained the biggest share of this apprentices group—7.6% of apprentices in PA programs who started and completed since 2014 were trained by this one program. The second largest program trained 4.5% of apprentices. Together, these two programs trained a cumulative total of 12.1% of the apprentices in PA programs who started and completed since 2014. The percentages stack, and we can use this figure to see how many PA programs trained what percent of completers in this timeframe.

Figure 9

Thirty Programs Trained 50% of All PA Program Completers Since 2014

Cumulative Percent of Apprentices Who Started and Completed a PA Apprenticeship Program since 2014, One Bar Per Program



Industry

Although there are more manufacturing apprenticeship programs than construction programs in Pennsylvania, more than eight times as many apprentices started construction programs in 2024. Over 80% of apprentices who started in PA programs in 2019 were in construction programs. Construction's share of new apprentices did not drop below 60% of new apprentices in the 17 years of data we analyzed. Almost 70% of all PA apprenticeship participants since 2008 have been in construction programs. Public administration apprenticeships, mainly for corrections officers and jailers, have historically held the second largest share of PA apprentices with the exception of 2018-2019 when manufacturing program starts slightly outpaced public administration starts. In all other years, manufacturing apprenticeships claimed the third largest industry share of starting apprentices in PA programs.

Of particular note, historically smaller apprenticeship sectors have recently expanded. Figures 10a and 10b show how many new apprentices started in different industries in 2008 compared to 2024, and their share of overall apprenticeship in PA programs.

Figure 10a

How Many New Apprentices Were Learning in Each Industry?

New Apprentices in Pennsylvania Apprenticeship Programs, by Industry and Year

► ● 2008

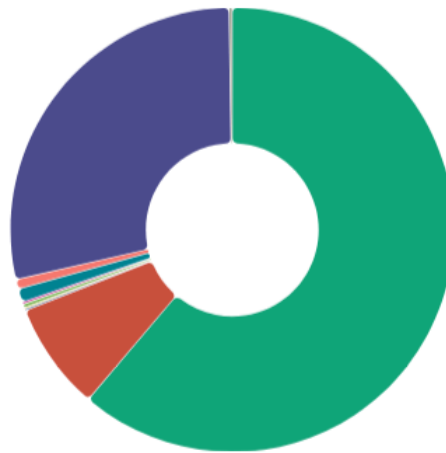
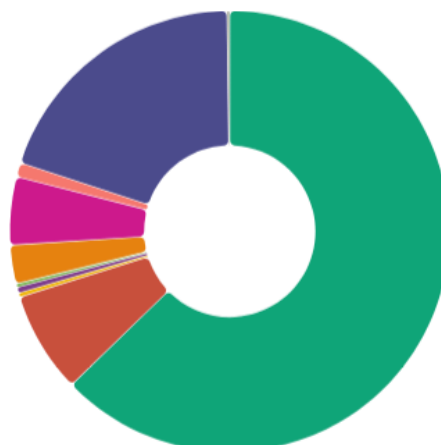


Figure 10b

How Many New Apprentices Were Learning in Each Industry?

New Apprentices in Pennsylvania Apprenticeship Programs, by Industry and Year

► ● 2024

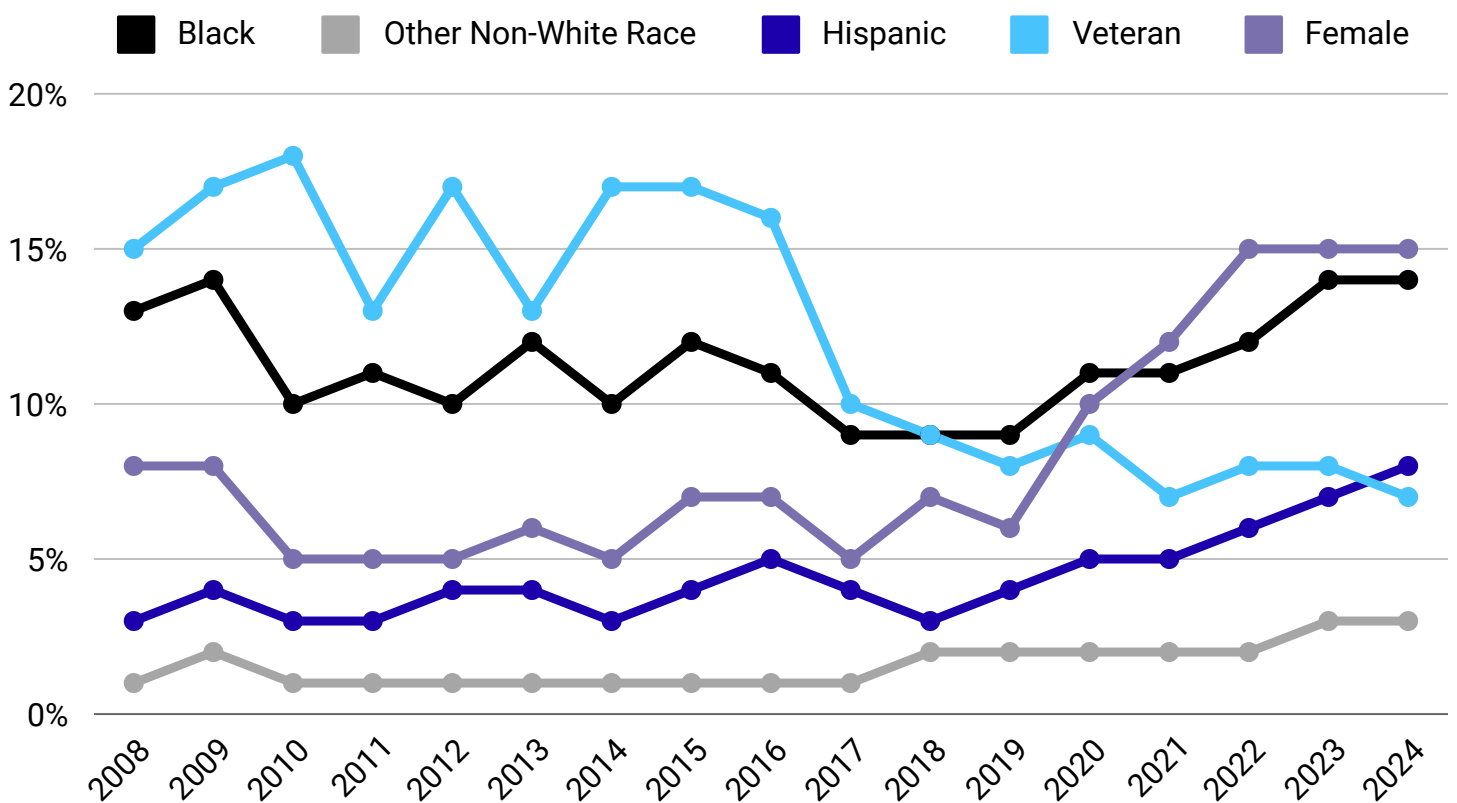


Demographics

Analyzing the demographics of new apprentices offers a noteworthy snapshot of apprentice diversity in PA programs, and reflects some important realities. Figure 11 shows the percent of Black, other non-white, Hispanic, veteran, and female apprentices registered in PA programs by year. Overall, shares of women and people of color in PA apprenticeship programs have increased since 2008. The biggest gain is seen for women’s increase, nearly tripling their percent of registrants from 2019-2023. Veterans’ share of registrants has fallen significantly since 2015. Closer analysis shows that this might not just be due to non-response rates in the data. In 2014, 557 apprentices reported that they were veterans when they registered in a PA apprenticeship program. A decade later in 2024, only 387 did. U.S. Department of Veterans Affairs data show that in 2014 there were 72,500 veterans living in Pennsylvania who were 34 years or younger. In 2024, the veteran population was considerably smaller – there were only 45,000 PA veterans age 34 or younger, just 62% of the veteran population in that age range a decade before. The median age of a new apprentice in a PA program has been between 26 and 27 years old for this entire data series. Although PA has fewer veteran apprentices than a decade ago, veterans are becoming apprentices at the same rate they were before.

Figure 11

Demographics of New Starters in PA Apprenticeship Programs, by Year



Occupations

Table 2 shows the top 40 PA apprenticeship program occupations by new registration count, 2014-2024. Correctional officer and jailer apprenticeship programs drew the most registrants (8,204), followed by carpenters and electricians with more than 6,600 registrants each. Stars (*) denote occupations that are one of the 10 fastest growing PA apprentice occupations since 2018, based on registration growth and number of apprentices overall. These 10 fastest growing PA apprentice

occupations were classified based on their Occupational Information Network (O*NET) code in RAPIDS data, a category narrower than the North American Industry Classification System (NAICS) code used to identify industry. The most specific occupation classification RAPIDS data offer is occupation title, outlined in Table 4.

Table 2

Top 40 Apprentice Occupations for PA Programs by Registration Count Since 2014	
Occupation	Total Registrations Since 2014
Correction Officer	8,204
Carpenter	6,835
Electrician	6,604
Line Erector	3,597
Plumber	2,627
Pipe Fitter (Construction)	2,054
Roofer	1,954
Sheet Metal Worker	1,620
Operating Engineer	1,346
Structural Steel Worker	1,325
Refrigeration Mechanic (Any Ind)	941
Construction Craft Laborer	860
Bricklayer (Construction)	851
Machinist/Precision	714
Elevator Constructor	645
Millwright	596
Boilermaker I	590
Painter (Const)	588
Cement Mason	525
Pipe Coverer & Insulator	501
Glazier	481
*Housekeeper, Com, Res, Ind	457
Tool And Die Maker	408
Tuckpointer, Cleaner, Caulker	399
Painter-Decorator (Painter Const)	389
*Licensed Practical Nurse - Home Health Care	372
Maintenance Mechanic (Any Ind)	347
*Industrial Manufacturing Technician	331
Mechatronics Technician	326
Floor Layer	298
*Level I: Child Development Specialist	285
Welder, Combination	277
Taper/ Drywall Finisher	245
Cabinetmaker	243
Tree Trimmer (Line Clear)	237
*Maintenance Technician	226
Electrician, Maintenance	218
*Internetworking Technician	197
Cook (Hotel & Restaurant)	190
Painter, Industrial Coating and Lining	186

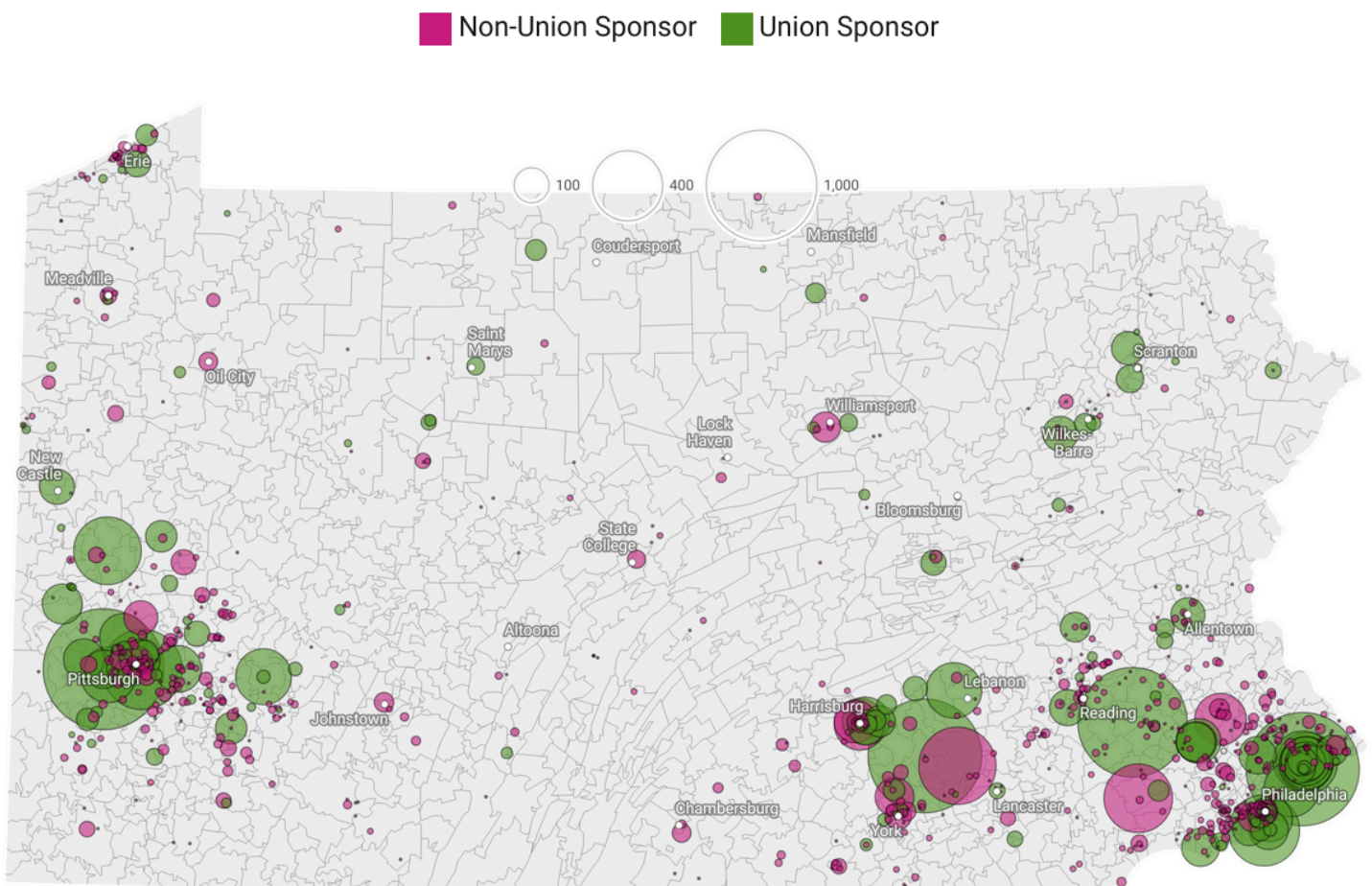
*Notes: *=one of the 10 fastest growing PA apprentice occupations since 2018, based on growth and number of apprentices overall.
Programs analyzed include some that are now canceled.*

Figure 12 shows a map of PA registered apprenticeship sponsors by the address sponsors listed in RAPIDS. They are listed by union or non-union status. Highlighting a dot will display the sponsor's name and the active apprentice count as of September 2024. Program sponsor dot size corresponds to the number of apprentices they sponsor across all of their programs.

Figure 12

Registered Pennsylvania Apprenticeship Program Sponsors by Address

Sponsors listed by union status and apprentice count as of September 2024



Source: Source: Keystone Research Center Analysis of US DOL RAPIDS data • Map data: © Esri, TomTom North America, Inc., United States Postal Service • Created with Datawrapper

Table 3 shows 100 PA apprenticeship programs ranked by the number of apprentices they've had complete the program in 2014 or later. This table provides the count of completed apprentices in the last decade, each program's occupation and sponsor, the program type, and the exit wage for 2024 apprentices (when data are available).

It is difficult to fairly compare completion rates for these 100 programs, as some programs have registered thousands of apprentices in this time and some have only registered a few dozen, and some programs are a year long and some are five years long. For a fairer comparison, we analyzed the completion rates for programs in these groups considering the number of apprentices who started between 2014-2018 and eventually completed the apprenticeship, taking into account the term length of the program. The only completion rate pattern that emerged showed an association between term-length and completion rate. There was a slight positive correlation ($r=.32$) between term length and program completion rate – longer programs tended to have a higher completion rate. All of the programs in this table that have term lengths shorter than two years had a completion rate about the same or lower than the average completion rate across *all* PA programs in the same time period. Table 3 below ranks these 100 PA apprenticeship programs who had the most completer apprentices who started in the last decade.

Table 3 (begins on following page)

Top 100 PA Apprenticeship Programs by Apprentices who have Completed Between 2014-2024

Rank	Completer Apprentice Count	Program Occupation	Sponsor Name	Program Type	Exit Wage Per Hour (2024*)
1	2,254	Electrical Power-Line Installers and Repairers	Northeastern Apprenticeship and Training Program (NEAT)	Group Joint	\$40.23
2	1,320	Carpenters	KML Carpenters' Apprenticeship & Training Fund	Group Joint	\$35.02
3	1,273	Carpenters	Eastern Atlantic States Carpenters Technical Centers	Group Joint	\$54.13
4	863	Correctional Officers and Jailers	Pennsylvania Department of Corrections	Individual Joint	\$23.01
5	683	Electricians	(PITTS) Electricians Local 5 JATC	Group Joint	\$40.60
6	638	Electricians	Apprentice Training for the Electrical Industry	Group Joint	\$69.58
7	614	Operating Engineers and Other Construction Equipment Operators	(PITTS) Western PA Operating Engineers	Group Joint	\$27.98
8	573	Plumbers, Pipefitters, and Steamfitters	Steamfitters Local Union No 449 Joint Apprenticeship Training Committee.	Group Joint	\$44.15
9	443	Plumbers, Pipefitters, and Steamfitters	Steamfitters Local Union 420 - JPATC	Group Joint	\$50.53
10	372	Structural Iron and Steel Workers	(PITTS) Iron Workers Local 3 JATC	Group Joint	\$38.89
11	361	Sheet Metal Workers	Sheet Metal Wrkrs JATF LU 19 of PHL & Vicinity	Group Joint	\$48.71
12	282	Roofers	(PHL) Roofers JAC (LU 30)	Group Joint	\$43.13
13	271	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Graterford	Individual Joint	N/A
14	270	Operating Engineers and Other Construction Equipment Operators	Ft. Washington Operating Engineers	Group Joint	N/A
15	269	Sheet Metal Workers	(PITTSBURGH) Sheet Metal Works	Group Joint	\$32.69
16	262	Plumbers, Pipefitters, and Steamfitters	PA Assoc. of Plmbng Htg & Cooling Cntrctrs (PHCC)	Group Non-Joint	\$23.00
17	256	Plumbers, Pipefitters, and Steamfitters	Harrisburg Plumbers	Group Joint	\$43.35
18	252	Plumbers, Pipefitters, and Steamfitters	(PHL) Plumbers	Group Joint	\$62.73
19	252	Electricians	Keystone Chapter ABC	Group Non-	\$22.75

				Joint	
20	249	Maids and Housekeeping Cleaners	Energy Innovation Center Institute	Group Non-Joint	\$17.88
21	249	Glaziers	The Finishing Trades Institute - Mid Atlantic Region	Group Joint	\$38.40
22	235	Insulation Workers, Mechanical	(PITTS)Asbestos Workers LU #2 JATC	Group Joint	\$38.16
23	233	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Forest	Individual Joint	\$19.18
24	232	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Coal Township	Individual Joint	\$19.18
25	231	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Somerset	Individual Joint	\$23.47
26	229	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Houtzdale	Individual Joint	\$19.18
27	226	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Camp Hill	Individual Joint	\$19.18
28	226	Electricians	Central PA Chapter Independent Electrical Contract	Group Non-Joint	\$26.25
29	224	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	Steamfitters Local Union 420 - JCB	Group Joint	\$38.09
30	224	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Mahanoy	Individual Joint	\$19.18
31	221	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Huntingdon	Individual Joint	\$23.03
32	221	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Waymart	Individual Joint	\$20.23
33	216	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Albion	Individual Joint	\$23.03
34	214	Plumbers, Pipefitters, and Steamfitters	(Pittsburgh) Plumbers Local 27 JATC	Group Joint	\$42.30
35	211	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Greene	Individual Joint	\$22.23
36	209	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Smithfield	Individual Joint	\$23.03
37	208	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Rockview	Individual Joint	N/A
38	199	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Benner Township	Individual Joint	\$23.03

39	199	Electricians	Western Central Pennsylvania Electricians ' Joint Apprenticeship and Training Committee	Group Joint	\$45.55
40	199	Painters, Construction and Maintenance	Finishing Trades Institute of Western PA (DC 57) J	Group Joint	\$32.50
41	197	Heating, Air Conditioning, and Refrigeration Mechanics and Installers	Steamfitters Local Union No 449 Joint Apprenticeship Training Committee.	Group Joint	\$44.15
42	191	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Frackville	Individual Joint	\$19.18
43	188	Painters, Construction and Maintenance	The Finishing Trades Institute - Mid Atlantic Region	Group Joint	\$42.81
44	185	Electricians	Apprentice Traning for the Electrical Industry (Zone 2)	Group Joint	\$56.40
45	183	Carpenters	Carpenters JATC of Greater PA-Lebanon Center	Group Joint	\$34.34
46	181	Structural Iron and Steel Workers	(PHL) Ironworkers JATC (LU 401)	Group Joint	\$53.20
47	179	Elevator and Escalator Installers and Repairers	(PHL) Elevator Constructors JAC (LU 5)	Group Joint	\$59.44
48	177	Insulation Workers, Floor, Ceiling, and Wall	(PHL) Insulation Workers IAHFIAW JAC (LU 14)	Group Joint	\$59.37
49	165	Electricians	Allentown Electricians JATC Local 375	Group Joint	\$45.15
50	164	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Dallas	Individual Joint	\$19.18
51	164	Plumbers, Pipefitters, and Steamfitters	Latrobe & Vicinity Plumbers/Pipefitters Local 354	Group Joint	\$38.57
52	163	Industrial Machinery Mechanics	Cleveland Cliffs and UAW Local 3303 JATC	Individual Joint	\$24.94
53	160	Construction Laborers	(PHL) Bricklayers & Allied Crafts JAC (LU1)	Group Joint	\$48.70
54	152	Electricians	Scranton Electricians	Group Joint	\$36.36
55	152	Carpenters	(Pittsburgh) Heavy Highway Carpenters JATC	Group Joint	\$32.40
56	150	Boilermakers	(PHL) Boilmaker JAC 13	Group Joint	\$52.10
57	141	Carpenters	Keystone Chapter ABC, INC	Group Non-Joint	\$28.00
58	139	Electricians	Chester Electricians JAC (IBEW 654) (Comm/Ind)	Group Joint	\$47.72
59	137	Cement Masons and Concrete Finishers	Cement Masons LU 592	Group Joint	\$46.70
60	126	Sheet Metal Workers	Sheet Metal Workers of Central PA JATC LU	Group Joint	\$43.09

61	121	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Mercer	Individual Joint	\$23.03
62	115	Plumbers, Pipefitters, and Steamfitters	Phl. Sprinkler Industry	Group Joint	\$57.20
63	111	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Muncy	Individual Joint	\$23.03
64	110	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Laurel Highlands	Individual Joint	\$23.03
65	107	Electricians	Wilkes Barre Electricians	Group Joint	\$39.81
66	105	Tapers	The Finishing Trades Institute - Mid Atlantic Region	Group Joint	\$42.25
67	104	Brickmasons and Blockmasons	Bricklayers Local 9 JATC	Group Joint	\$36.64
68	103	Electricians	Reading Electricians JATC Local 743	Group Joint	\$42.02
69	101	Construction Laborers	Western PA Laborers JATC	Group Joint	\$28.83
70	100	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Cambridge Springs	Individual Joint	\$19.18
71	99	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Retreat	Individual Joint	N/A
72	99	Brickmasons and Blockmasons	Harrisburg Bricklayers & Allied Craftworkers LU	Group Joint	N/A
73	97	Electricians	Eastern PA Chapter ABC (East Norriton, PA)	Group Non-Joint	\$27.00
74	97	Cement Masons and Concrete Finishers	(Pittsburgh) Cement Masons Local 526 JATC	Group Joint	\$32.84
75	95	Elevator and Escalator Installers and Repairers	IUEC Local 6 JATC	Group Joint	\$46.84
76	93	Licensed Practical and Licensed Vocational Nurses	BAYADA Home Health Care	Group Non-Joint	\$27.63
77	93	Telecommunications Equipment Installers and Repairers, Except Line Installers	Apprentice Training for the Electrical Industry	Group Joint	\$61.91
78	91	Millwrights	Eastern Atlantic States Carpenters Technical Centers	Group Joint	\$53.54
79	91	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Chester	Individual Joint	\$19.18
80	85	Floor Layers, Except Carpet, Wood, and Hard Tiles	Eastern Atlantic States Carpenters Technical Centers	Group Joint	\$55.07

81	81	Electricians	York Electrical Institute	Group Joint	\$37.45
82	79	Industrial Engineering Technologists and Technicians	Pennsylvania College of Technology	Group Non-Joint	\$24.39
83	77	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Pine Grove	Individual Joint	\$19.18
84	76	Millwrights	KML Carpenters' Apprenticeship & Training Fund	Group Joint	\$39.83
85	75	Brickmasons and Blockmasons	(PHL) Bricklayers & Allied Crafts JAC (LU1)	Group Joint	\$48.70
86	74	Plumbers, Pipefitters, and Steamfitters	Worth & Company, Inc.	Individual Non-Joint	\$42.00
87	74	Plumbers, Pipefitters, and Steamfitters	Keystone Chapter ABC, INC	Group Non-Joint	\$23.13
88	74	Structural Iron and Steel Workers	Ironworkers Local 404 JATC	Group Joint	\$36.26
89	74	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Fayette	Individual Joint	\$21.11
90	73	Electricians	Harrisburg Electricians JATC	Group Joint	N/A
91	73	Electricians	Electricians IBEW Local 56 JATC	Group Joint	\$31.00
92	72	Carpenters	Eastern Atlantic States Carpenters Technical Centers	Group Joint	N/A
93	72	Carpenters	Kinsley Construction INC	Individual Non-Joint	\$26.29
94	71	Training and Development Specialists	Keystone Development Partnership	Group Non-Joint	\$33.41
95	71	Painters, Construction and Maintenance	The Finishing Trades Institute - Mid Atlantic Region	Group Joint	\$59.78
96	70	Electricians	The Tri-M Group LLC	Individual Non-Joint	\$28.80
97	70	Roofers	(ERIE) Roofers Local 210 JATC	Group Joint	\$33.00
98	69	Millwright	Carpenters JATC of Greater PA-Lebanon Center	Group Joint	\$39.21
99	67	Correctional Officers and Jailers	PA Dept. of Corrections - SCI - Quehanna Boot Camp	Individual Joint	\$19.18
100	67	Roofers	(Pittsburgh) Roofers Local 37 JATC	Group Joint	\$37.50

* Wage data are often automatically determined in the reporting system by an apprentice's entry date, exit date, and the apprenticeship program's wage schedule. In some cases, the wage the apprentice is paid at the time they complete the program may be higher than the data reflect.

We identified a group of “fast-growing” apprenticeship occupations for further analysis using the most specific occupation information available in RAPIDS to classify these occupations. To be considered fast-growing for this list, an occupation must have:

- been among top programs with increased registrant counts since 2018 (in relation to their 2014-2017 registrant counts)
- steady or growing registrant counts in recent years
- not be among the occupations that have historically dominated apprenticeship in Pennsylvania.

Table 4 shows 12 fast growing occupations, their registrants since 2018, and the exit wages for their apprentices in 2024.

Table 4

Fast Growing Occupations in PA Apprenticeship since 2018		
Occupation Title	Registrants since 2018	Median Exit Wage for 2024 *
Licensed Practical Nurse - Home Health Care	373	\$26.00
Maintenance Technician	263	\$23.60
Plastics Process Technician-Injection Molding	60	\$23.63
Nurse Assistant, Certified (Senior Care and other Miscellaneous Health Practitioners)	121	\$20.00
Registered Nurse - Home Health Care	75	\$28.01
Housekeeper, Com, Res, Ind	472	\$17.88
Nurse Assistant, Certified (CB) (Nursing Care Facility)	82	\$17.39
Level I: Child Development Specialist (CDA)	288	\$14.00
Registered Apprenticeship Navigator	122	\$33.41
Level II: Early Childhood/Pre-K Teacher (Associate Degree)	153	\$17.00
Industrial Manufacturing Technician	319	\$26.70
Internetworking Technician	159	\$15.38

Notes: Fast growing occupations were identified by a combination of new apprentices registered since 2018, increase in apprentices registered since 2014, steady and/or growing registration counts in recent years, and expansion of new occupation/industries.

** Wage data are often automatically determined in the reporting system by an apprentice's entry date, exit date, and the apprenticeship program's wage schedule. In some cases, the wage the apprentice is paid at the time they complete the program may be higher than the data reflect.*

Compared to Pennsylvania’s median hourly wage of \$22.81 in May 2023 (Occupational Employment and Wage Estimates from The Bureau of Labor Statistics), some apprenticeships in these 12 fast growing groups—especially some in specific types of nursing and childcare/education—had low exit wages for completer apprentices in 2024. While closer analysis of some starting and exit wage comparisons suggest that there has been recent wage growth some of these occupation (cases where the exit wage may be close to or lower than the starting wage for apprentices who entered and completed the program in the same two years), many wages in these fast growing occupations are

low, and some are even near or below the \$15 per hour state minimum wages of several of Pennsylvania's border state and regional neighbors.

Pre-Apprenticeship Programs

An overview of PA pre-apprenticeship programs and participation

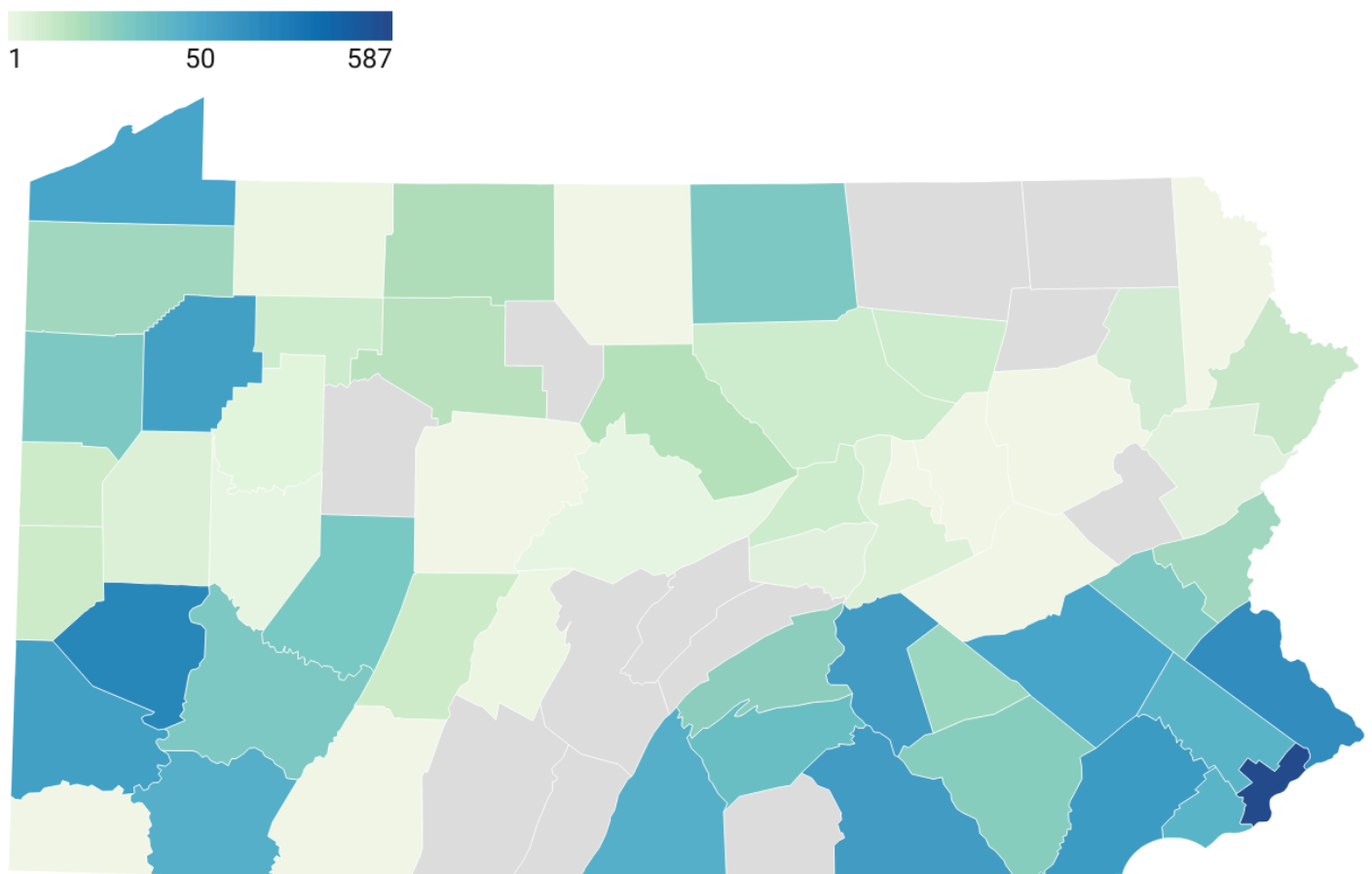
Counts, Location, and Demographics

There were 2,478 pre-apprentices in Pennsylvania programs in the data collection period of July 1st 2023 through June 30th 2024. At the end of the data collection period, 2,189 pre-apprentices were reported as either still participating in their program or that they had successfully completed it in the reporting period. Figure 13 is PA county map that shows the home county of PA pre-apprentices.

Figure 13

Pre-Apprenticeship Program Participants by Home County

Sponsor-Reported Data for Completed & Still Registered Pre-Apprentices, July 2023 - June, 2024.



88 additional pre-apprentices reported an out-of-state home address.

Map: Keystone Research Center Analysis • Source: Pre-Apprentice data provided by the PA Apprenticeship and Training Office (ATO) • Created with Datawrapper

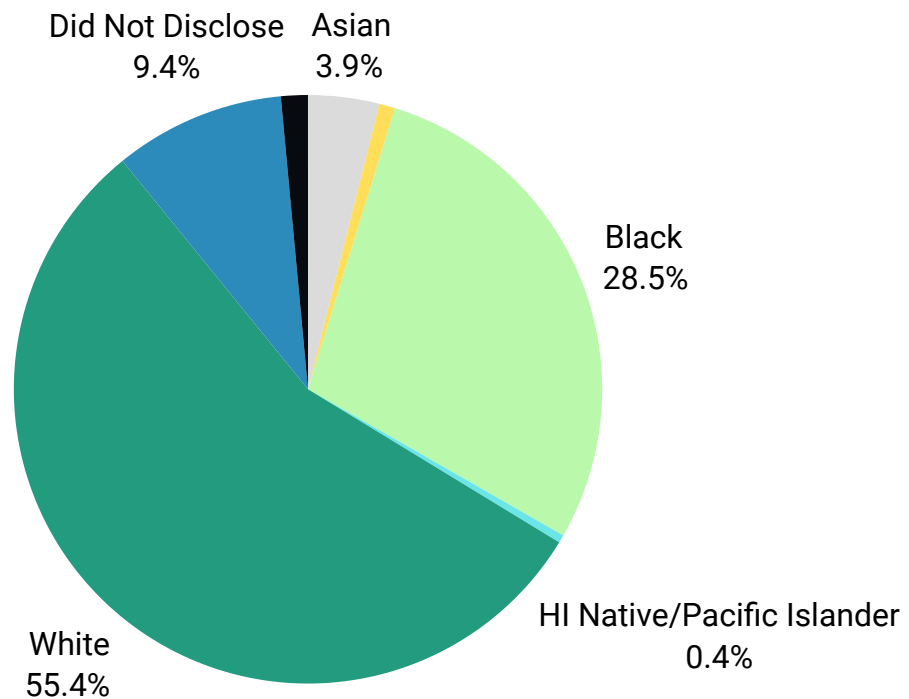
Of the 1,151 pre-apprentices who successfully completed a program in the reporting period, 11% were Hispanic or Latino. When asked to report their race, pre-apprentices responded:

- 10 are American Indian or Alaskan Native
- 45 are Asian
- 328 are Black
- 5 are Hawaiian Native or Pacific Islander
- 108 did not disclose their race
- 638 are white only (participants could select more than one race).
- 17 reported multiple races.

This breakdown is shown in the Figure 14 pie chart, with the small yellow slice representing American Indian or Alaska Native (less than 1%) and black slice representing multi-race pre-apprentices (1.5%). All others are labeled.

Figure 14

Pre-Apprenticeship Completers by Race, 2023-2024



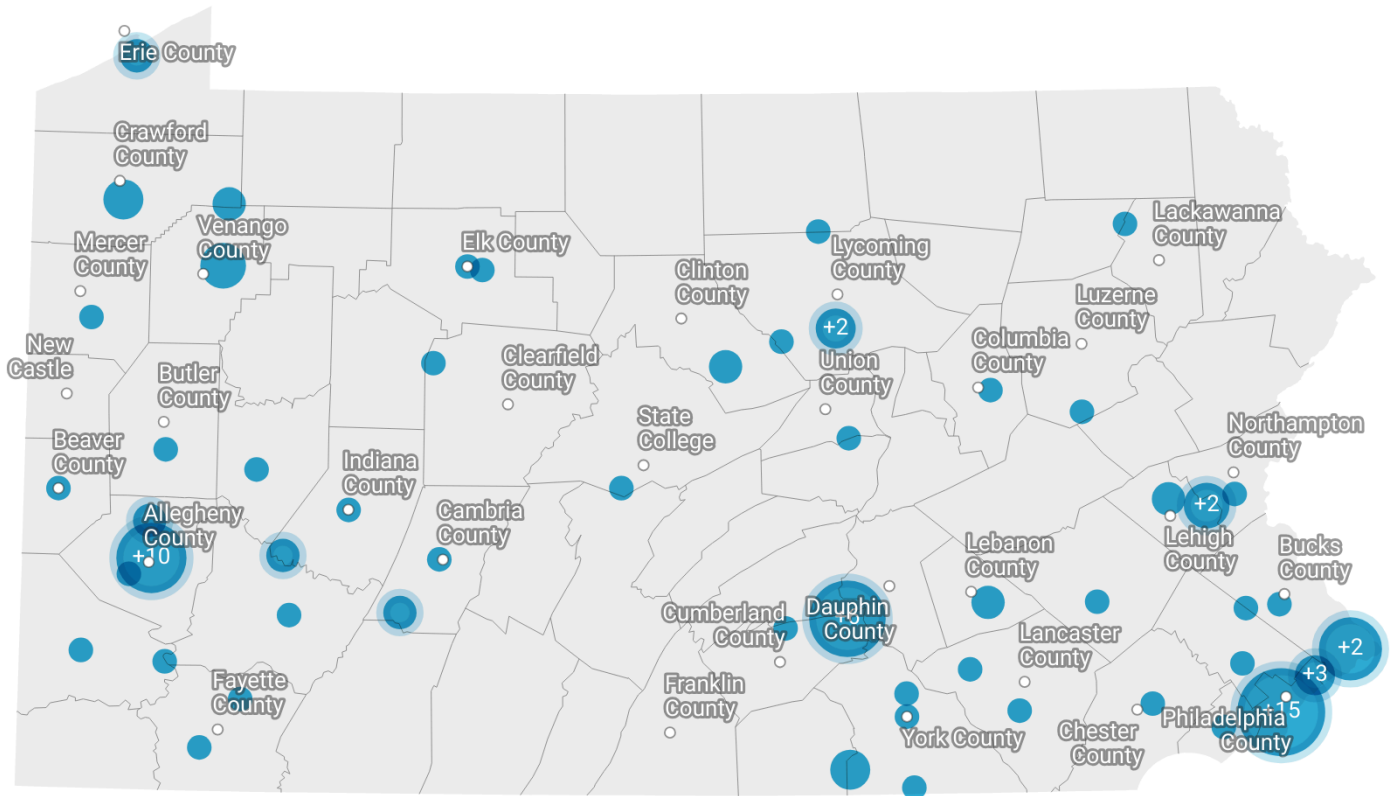
The average age of a completer pre-apprentice in the reporting period was 24 years old, and median age was 19. Of those pre-apprentices still finishing their programs, 21.9% are female. Similarly, 22.4% of completers in the data reporting period are women.

Figure 15 shows the geographic distribution of those 120/121 Pennsylvania pre-apprenticeship programs registered as of June 30th, 2024.

Figure 15

Registered Pre-Apprenticeship Programs in Pennsylvania

Programs by county, 2023-2024 school year. Larger dots represent multiple programs by that sponsor at one location.



Virtual programs are recorded in their sponsor's county of registration.

Map: Keystone Research Center • Source: Pennsylvania Apprenticeship and Training Office • Created with Datawrapper

Additional Analyses

KRC explored two other apprenticeship data issues of interest to the committee— a data sensitivity analysis and data matching feasibility.

Sensitivity Analysis

In conversations with U.S. DOL RAPIDS data representatives, a potential data issue was brought to light related to apprenticeship and data quality. One of the sponsor's responsibilities outlined in the U.S Department of Labor's Requirements for Apprenticeship Sponsors Reference under Section 1 - Standards of Apprenticeship 29 CFR § 29.5 is that the sponsor "must advise the Registration Agency within 45 of the execution of each new apprenticeship agreement." In short, new registrant information must be provided through RAPIDS in a timely fashion—45 days or less. This rule is not new, but in our conversations with state and federal data managers, we were informed that this rule

was not strongly enforced in the past. There were sometime situations where apprenticeship programs would submit data for a group of apprentices late, even up to a year late. One federal data manager was concerned that it was possible these late updates were not accurately captured in the federal data solely because of how the data are updated in the federal system. This concern centered around the question of whether there may be an undercount of apprentices in the federal data in years before the 45 day rule was more widely enforced.

As part of this report, KRC performed a sensitivity analysis, comparing RAPIDS data provided by the U.S. DOL to data provided by the PA Apprenticeship and Training office for the same years. For this process, we We found no evidence that these late-submissions were inaccurately tracked in the federal data. From 2008-2023, there were only 33 instances (representing a tiny 0.047% of apprentice entries) where the federal dataset had information for an apprentice and the PA dataset did not. We believe this tiny difference points to better accuracy in the state (ATO) data, or perhaps a difference in how federal data managers “close out” unresolved entries that remain open in the system far beyond an apprentice’s expected completion date. For our sensitivity analysis concerning the 45 day rule, we conclude that there is little or no undercount of PA apprentices in the federal data as a result of enforcement differences across years.

Matching Data to Explore Apprentice Outcomes

While there is widespread interest in the ability to track apprentice employment and wage outcomes post-apprenticeship, no current Census or PA data product allows researchers to track apprentices after they’ve exited their program. The format of RAPIDS allows workforce staff, sponsors, researchers, and others to track to apprentices while they are participating in a program, but the data coverage end with an exit wage and exit date when an apprentice leaves their program. As part of this report, KRC conducted interviews with data managers and researchers to assess the feasibility of matching Pennsylvania apprentice data with any other data product that would allow interested parties to track apprentice outcomes years later.

National Efforts

Our survey started with a discussion in a national RAPIDS working group meeting where members raised the idea and feasibility discussion of linking RAPIDS with a Census data project. Due to data privacy concerns, would process would require that the data link be made by Census researchers and the data made available for use by researchers who have obtained Special Sworn Status from the Census Bureau, clearing them to work with restricted data in very specific conditions. Most often, matched data such as these are only available to researchers who work in secure Federal Statistical Research Data Centers (FSRDCs or RDCs). There are 34 of these sites in the U.S., including two in Pennsylvania. One is located in State College on the Pennsylvania State University campus and the other is located in Philadelphia in the Federal Reserve Bank. RAPIDS working group members discussed the obstacles to linking this data, including data access and cost. They discussed what Census Bureau data products may be used, specifically mentioning the American Community Survey (ACS) and Survey of Income and Program Participation (SIPP). As of this report, we know of no existing/concrete efforts to link RAPIDS with a Census data product.

Pennsylvania Discussion

We continued our survey by discussing data-matching feasibility at the state level. ATO staff raised an important issue outside of data/privacy concerns – a Social Security number (SSN) would be essential for linking RAPIDS data with any state-level data product (such as unemployment and wage information). While SSNs are requested in apprentice applications, they are not a required field. As a result, only a small fraction of the PA apprenticeship data could be matched with unemployment and wage data by using SSNs. This small fraction is not random and therefore analysis of this group would not likely yield information that is representative of apprentice outcomes or generalizable to wider apprentice populations. As a result of this conversation, we returned to our RAPIDS working group members to explore other state-level efforts to link data.

Kansas Efforts

Researchers in Kansas are currently working on three new projects in the apprenticeship space. We spoke briefly with Shonda Anderson, the director of KansasWorks, about these efforts.

The U.S. National Science Foundation Established Program to Stimulate Competitive Research (EPSCoR) funds a program at The University of Kansas (KU), Kansas State, and Wichita State Universities called the Kansas Data Science Consortium (KDSC). The Department of Commerce commissioned KDSC to assess the economic impact of high quality, earn-and-learn registered apprenticeships in Kansas. Two studies are underway. One is an “ROI” (return on investment) study, where KU students are studying return on investment with employers participating in registered apprenticeship. This study has a Kansas focus, but similar to a [national study](#)*. Additionally, they’re conducting a registered apprenticeship study—a time series analysis of 20+ years of apprenticeship data from Kansas/RAPIDS.

The third project is a RAPIDS connection to KansasWorks, the state workforce system. Shonda described this project’s intention to make data reporting to the U.S. DOL easier. Separately, they plan to begin matching RAPIDS data to their Department of Labor data in 2025/2026, but are “not there yet.”

She acknowledged the SSN matching issue, and spoke about how they are using SSNs, first and last names, and addresses to match apprentices to KansasWorks data. As long as two of the three data point match, they consider it a “good match”, and that they get “pretty decent matching” with just name and address. Shonda spoke about how many of these apprentices are union construction workers who stay with the union after their apprenticeship and may have 2-8 employers in a year, and how it is difficult to study employment and wage patterns.

Of particular interest to groups looking to match RAPIDS data to other data, Shonda spoke about how U.S. DOL cannot or will not let any automated data systems “talk” to RAPIDS. This is most likely a reasonable protective measure due to data privacy and storage issues, but this also slows the matching process for data managers.

*National study: https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/AAI/AAI_ROI_Final_Report_508_9-2022.pdf

Policy Recommendations and Conclusion

Recommended ways Pennsylvania
can expand high-quality
apprenticeship programs

We conclude this report by summarizing the strides Pennsylvania's Registered Pre-Apprenticeship and Apprenticeship programs have made and sketching policy options that could enable Pennsylvania to expand high-quality apprenticeship. We draw from lessons in other countries that have expansive apprenticeship programs, comparing policy, practice, and regulations in high-quality apprenticeship.

Before diving into policy specifics, it may be helpful to take a step back and recall the problems that have led the Pennsylvania legislature and our state's last two governors to support expanding apprenticeship.

According to the [Bureau of Labor Statistics](#), 68.4% of U.S. jobs require less education than an Associate's Degree. That share is projected to decline only 1.1 percentage points, to 67.3%, by 2033. Particularly for the two thirds of U.S. jobs that are outside of the construction industry and do not require an Associate's Degree or higher, the U.S. lacks education, training, and career systems that connect tightly to employers and that link our K-12 and post-secondary education to the economy. The lack of systems of learning/careers connected to the economy hampers economic opportunity for most U.S. workers. It makes our businesses less productive and less innovative. It hurts our competitiveness.

Apprenticeships have attracted renewed and rare bipartisan support over the past dozen years, nationally and in Pennsylvania, in part because many observers and stakeholders think they could create a more functional training/learning infrastructure connected to the economy for a significant share of non-college workers and PA industries. There is also an intuitive recognition of the power of apprenticeship as a learning model. Most people understand that you learn how to do jobs —from physician to cement mason, lawyer to chef — by actually doing them, receiving mentoring from experienced workers, and learning from peers.

Despite its broad potential applicability and common-sense power and appeal, apprenticeship is underutilized in Pennsylvania and the United States. In Pennsylvania in 2024, active apprentices equaled 0.25% of Pennsylvania employment. By contrast, apprentices accounted for a larger share of the labor force in other countries. Table 5 shows this comparison.

Table 5

Apprentices as a Percentage of Workforce, 2022

Country	Apprentice % of Labor Force
Australia	2.9%
England	2.5%
Germany	3.0%
Switzerland	4.2%
USA	0.3%

*Reproduced from **Field Report: Apprenticeship Program Registration**. Stephen F. Hamilton, January 2024, *Apprenticeships for America*, pg. 13.*

Pennsylvania embarked on an effort to expand apprenticeship based on the idea buttressed by experience in other countries—that scaling the apprenticeship model beyond the only few pockets where it has been historically significant (unionized construction, corrections, and manufacturing) could address and be part of the solution to people’s dissatisfaction with current economic opportunities and the education system. It can provide the “missing link” between education and the economy or, more accurately, embed learning in the economy.

As we approach a decade in PA’s effort to expand apprenticeship to non-trade occupations, industries, and populations, our report offers critical insight into the progress we’ve made, some of the challenges associated with scaling apprenticeship where it hasn’t been present or widespread, and also to the issue of program quality.

Observation 1: A Small Number of Programs Do Most of the Training

Whether you’re talking traditional or newer, “nontraditional” apprenticeships, a relatively small number of programs account for most of the apprentice training. In many cases, these are group programs. Seventeen PA group apprenticeship programs trained 39% of all apprentices who completed after 2014. Similarly, 55% of programs that registered 2018- July 2021 were group programs, and they trained over 68% of the apprentices who started and completed since 2018.

Observation 2: Wages and Wage Progression

This report shows that wages in some new/expanding apprenticeships are low at both entry and exit, and/or there is little wage progression. A fair number of apprenticeships with low wages are service sector jobs in industries funded by a combination of government and families with limited ability to pay, such as senior care/long term care, and childcare. The role of government funding and regulation could be seen as a reason to “throw up our hands” and say we can’t afford to pay journeypersons in these occupations decently. It could also be seen as an opportunity because it gives policymakers

leverage to enact wage standards and wage progression requirements. The issues of low wages and lack of wage progression are also issues in some industries that are less reliant on public funding, including manufacturing and non-union construction.

Low wages and lack of wage progression are challenges that limit the expansion of apprenticeship to German and English levels as well as reduce job quality. It seems highly unlikely that occupations in which apprentices and journeypersons receive wages far below a living or self-sufficiency wage will ever see apprenticeship become widespread.

Observation 3: Promoting Equity and Diversity

This report shows that Pennsylvania apprenticeship overall has become slightly more racially and ethnically diverse and considerably more gender diverse in recent years. For women, this expansion primarily reflects the expansion of apprenticeship beyond male-dominated occupations to occupations with female-dominated occupational segregation. To a lesser extent it reflects growing female and Hispanic shares of unionized construction apprenticeships. Unsurprisingly, the big uptick in female participation in apprenticeship concentrates in low-paid service occupations. It's not enough to open up more apprenticeship to women and people of color. For an expansion of apprenticeship to promote equity outside construction—i.e., in about 95% of the economy—we have to address the wage issue.

Observation 4: Retention

Overall, PA apprenticeships have a completion rate of around 61%. Understanding reasons why apprentices withdraw is key to improving completion rates. Occasionally RAPIDS public data will have a note such as “apprentice left for other employment” or “joined armed services,” but a deeper understanding of why people drop out is necessary for helping more people finish apprenticeship programs.

We expect that the reasons people do not complete apprenticeship vary. In apprenticeships with low wages, including for journeypersons, we expect but have not yet proved that completion rates tend to be low. In newer, lower-paid service sector apprenticeships, we can explore whether sample sizes are large enough at unionized companies to see whether exit wages and retention rates at those companies are higher. We know from previous research that completion rates are higher in joint labor-management construction apprenticeships than non-union ones—although completion rates could improve in both.

In traditional construction apprenticeship, we know a fair amount from best-practice research about factors that reduce completion rates and also ways to improve them.

- Childcare is a barrier for women starting/completing apprenticeships
- The lack of drivers' licenses and funds for transportation is a major impediment according to program managers overseeing apprenticeship readiness programs/pre-apprenticeships and seeking to place graduates into apprenticeships.
- Low-income participants entering apprenticeship need help paying for shoes and tools.
- In traditional, and likely non-traditional, apprenticeships, support networks—both mentors and more experienced “peer mentors”—have demonstrated effectiveness at improving retention.

The design of Governor Shapiro’s new Commonwealth Workforce Transportation Program (CWTP), which will provide subsidies to companies that take on new apprentices and other new hires on projects funded by federal climate and infrastructure dollars, has been informed by an understanding of these barriers to diversify apprenticeship intake and high retention rates. Such supports are needed more broadly.

Policy Options

We now turn to policy options that could enable Pennsylvania to scale high-quality apprenticeship, drawing both from our knowledge of Pennsylvania specifics and on experience in other countries and states. We do not attempt to outline a detailed blueprint here, but rather some possible directions for consideration by the Apprenticeship and CTE Committee, full PA Workforce Development Board, and the Governor’s and Department of Labor & Industry’s policy offices.

A central starting observation is that counties with apprenticeship at 10 times the scale in the United States (relative to employment) have a host of “systemic” support for apprenticeship that enable it to achieve scale, high completion rates, and job quality. Could Pennsylvania seek to create versions of some of those systemic supports?

1. Skill standards and common assessment tools

Countries such as Germany, Australia, and the United Kingdom all have entities that maintain standards for apprentice-able occupations at a national level. With such standards, each new apprenticeship in an occupation starts with a common definition of the skills people need to know which can guide, in turn, development of similar curricula for apprenticeship programs, and contribute to ensuring that journeypersons who complete an apprenticeship have a common body of knowledge. A complement to having some uniformity in skill standards is common examinations and assessments to ensure some uniformity in what people actually learn. Skill standards and common assessments could be maintained in a government entity or contracted to one or more public/private entities that meet a set of criteria related to knowledge of industry, including worker as well as employer voices, and wage standards.

2. Government subsidy of related technical instruction

In countries with widespread apprenticeship, the classroom education is ordinarily integrated tightly into the public education system and thus paid for by the government. Pennsylvania could move in that direction in two ways.

First, if Pennsylvania adopts a free college tuition program as proposed by the Pennsylvania Promise legislative proposal, (a “pilot version” of which passed the Pennsylvania House in 2023), classroom related technical instruction (RTI) articulated with college credit could be reimbursed to the RTI provider at the same level per credit as the “scholarship” received by students attending community colleges. (Since apprenticeship education is “free”—and, indeed, as implied by the phrase “lean and earn” apprentices get paid—the student does not need a scholarship.) Thus, for example, at \$232.50 per credit hour for an in-district student, Harrisburg Area Community College in 2024-25 costs \$2790 for a full-time (12 credit hours) semester. If an apprenticeship program leads to journeypersons receiving an Associate’s Degree equivalent to 48 credits, therefore, it would receive \$11,160.

Second, Pennsylvania could subsidize high-quality pre-apprenticeship programs delivered in Career and Technical Education in high school. The subsidies could be small and include a small amount of funding based on the number of pre-apprenticeship completers, the increase in the number of completers, and the number of completers who enter an apprenticeship affiliated or articulated with the pre-apprenticeships.

3. Wage and benefit standards and wage progression

RAPIDS data and our discussion establish the need for wage standards to (a) lift entry and exit wages in low-wage service occupations with a growing number of new apprenticeship programs and apprentices; (b) to raise wages and strengthen wage progression in some manufacturing apprenticeships; and to (c) raise wages and strengthen wage progression in some non-union construction apprenticeships. The state could promote wage standards and wage progression in distinct ways customized to each of these contexts. For example, reimbursement rates could be adjusted for employers with more journeypersons in child care and long-term care. State (and local) construction procurement and/or responsible contractor ordinances could require or reward contractors that pay first-year apprentices a living wage and journeypersons the prevailing wage for their occupation. In all three of these segments, the state and local workforce development boards could allocate workforce training and apprenticeship subsidies based on whether programs meet wage and wage progression standards. Similarly, funding for entities to establish/strengthen skill standards and assessment tools for families of occupations (number 1) should require incorporation of wage and wage progression standards.

4. Free the data to support scaling and system building for high-quality apprenticeship

In commissioning this report, the Apprenticeship and CTE Committee of the PA WDB signaled its aspiration to have its work supported by available data. The rich, if imperfect (as always), RAPIDS database provides the committee, state board, legislature and gubernatorial administration with a powerful, and until now, underutilized tool for guiding policy and performance improvement. The committee's goal of linking RAPIDS data with wage records further signals the aspiration to achieve evidence-based policymaking. Another way to strengthen the data support for scaling PA apprenticeship will be linking pre-apprenticeship data with CWDS and with RAPIDS. Even without further data enhancements, the opportunity to further utilize RAPIDS as it currently exists to drill down on completion rates and how they vary based on different variables—in construction, manufacturing, low-wage service occupations and across the board.

Pennsylvania is at the forefront of a national movement in the United States to scale apprenticeship. By explicitly engaging in a discussion of policies that can achieve apprenticeship scale and system-building—informed by annual state subsidies for apprenticeship that now equal \$2 per worker per year—Pennsylvania can move apprenticeship from the margins of the Pennsylvania economy (outside construction) to the center of state efforts to boost good jobs, Pennsylvania businesses, and living standards and competitiveness.

EXHIBIT B

Documentation of Good-Faith Efforts to Recruit Registered Apprentices

Submitted by Petitioner in Support of Waiver Request

INSTRUCTIONS

Petitioner should complete each section below to document the specific steps taken to identify, recruit, and hire registered apprentices in each craft classification covered by the Responsible Contractor Ordinance. Attach supporting documentation (emails, letters, screenshots, correspondence) as sub-exhibits where indicated.

Petitioner / Contractor Name: Jorich, Inc.

Project / Bid Reference: W.C. Maple Alley Sewer Upgrades

Date Range of Recruitment Efforts: Ongoing - since 2022

1. CONTACT WITH PA APPRENTICESHIP AND TRAINING OFFICE (ATO)

Petitioner contacted PA L&I Apprenticeship and Training Office to identify registered programs in the relevant craft classifications

Date(s) of Contact: 7/14/2025; 2/9/26; 2/12/26; 3/4/26

Name of ATO Representative Contacted: Multiple; Chelsie Pinero

Method of Contact (phone / email / in-person): email; phone; web meetings/teams

Summary of Response Received: No non-union programs available for us to join. Small size of company will most likely not be approved by Apprenticeship Council to provide our own Program. Looking into other options

Attach correspondence as Sub-Exhibit B-1

2. CONTACT WITH ABC CHAPTER APPRENTICESHIP PROGRAMS

Petitioner contacted ABC Keystone Apprenticeship & Training Trust (Manheim, PA)

Date(s) of Contact: Multiple; Joned Joned ABC Program Below

Response / Availability of Apprentices:

None Available;

- Petitioner contacted ABC Eastern Pennsylvania Apprenticeship Trust (Harleysville / Allentown)

Date(s) of Contact: Multiple; Joned Joned ABC;

Response / Availability of Apprentices:

We hired one R. Cortez. He was employed for ~2yrs. Left off due to harsh winter. Trying to bring back.

- Attach correspondence as Sub-Exhibit B-2

R. Cortez App cert. Attached

3. CONTACT WITH JOINT APPRENTICESHIP AND TRAINING COMMITTEES (JATCs)

Craft Classification: Heavy Equipment Operator

Program(s) Contacted: Western PA Operating Engineers JATC; Ft. Washington Operating Engineers

Date(s) of Contact: NA

Response Received: NA

Apprentices Available for Hire? (Y/N):

If No, Reason Given: We are non-union.

Craft Classification: Construction Craft Laborer

Program(s) Contacted: Eastern PA Laborers Training Center; Western PA Laborers JATC

Date(s) of Contact: NA

Response Received: NA

Apprentices Available for Hire? (Y/N):

NA

If No, Reason Given: We are non-union.

Craft Classification: Cement Mason / Concrete Finisher

Program(s) Contacted: Cement Masons Local Union 592; Pittsburgh Cement Masons Local 526 JATC

Date(s) of Contact: NA

Response Received: NA

Apprentices Available for Hire? (Y/N):
NA

If No, Reason Given: We are non-union.

Craft Classification: Truck Driver / Teamster

Program(s) Contacted: Teamsters Heavy Highway programs (if applicable)

Date(s) of Contact: NA

Response Received: NA

Apprentices Available for Hire? (Y/N):
NA

If No, Reason Given: We are non-union

Attach all correspondence as Sub-Exhibit B-3

4. ONLINE RECRUITMENT AND JOB POSTINGS

- Posted apprentice position(s) on PA CareerLink (pacareerlink.pa.gov)
- Posted apprentice position(s) on Indeed, ZipRecruiter, or equivalent job board
- Posted apprentice position(s) on company website
- Contacted local vocational-technical schools or career and technology centers
- Contacted PA CareerLink office directly

Date(s) of Posting(s): NA - none non-union apprenticeship exists in PA that we could hire and allow them to complete

Number of Responses Received:
NA

Number of Qualified Registered Apprentice Applicants:
NA

Attach job postings and response documentation as Sub-Exhibit B-4

5. DIRECT OUTREACH TO KNOWN EMPLOYERS AND CONTRACTORS

- Petitioner contacted other contractors in the region to inquire about availability of registered apprentices for hire or subcontracting

Contractors Contacted (list): NA

Results of Outreach: NA - we are non-union; we cannot hire an employee

Attach correspondence as Sub-Exhibit B-5

6. SUMMARY OF GOOD-FAITH EFFORT RESULTS

Craft Classification	Programs / Sources Contacted	Total Contacts Made	Apprentices Available	Hired?
Heavy Equipment Operator	NA	NA	NA	NA
Construction Craft Laborer	ABC Eastern	Multiple		NA 1
Cement Mason / Concrete Finisher	NA	NA	NA	NA
Truck Driver	NA	NA	NA	NA
Other:				

CERTIFICATION

I certify that the good-faith recruitment efforts described above were undertaken by or on behalf of Petitioner, and that the results reported are true and correct to the best of my knowledge, information, and belief.

Signature: Dewey Jurid

Printed Name and Title: Dewey Jurid

Date: 3/30/26

Dewey Jurich

From: Pineiro, Chelsie <cpineiroco@pa.gov>
Sent: Thursday, March 19, 2026 2:12 PM
To: Dewey Jurich; Matthew Sippel
Cc: Pineiro, Chelsie
Subject: Jurich, Inc.; RA Program Building Recap

Hi Dewey,

It was a pleasure meeting with you today and learning about Jurich Inc.'s apprenticeship goals. During our discussion, we touched on considering to join a group model program which removes the concerns of compliance and sustainability from you as a "sponsor".

With that, I have provided a list of group-model programs within PA and one that is registered nationally. As we reviewed, the national program seems to have a virtual RTI component that may be beneficial to your needs.

Please review and contact the sponsors for more information. I will check-in with you in roughly 3-weeks to see if you have decided on joining a group model or creating your own.

Please do not hesitate to reach out to me should you have any questions or concerns.

National Program:

LEARNING ALLIANCE CORPORATION - 2022-ZA-104137 – Have both occupations you are looking to create
Ruth Tirado, rtirado@mylearningalliance.com, 954-932-7378 (Sponsor)
Fred Arnold, farnold@mylearningalliance.com, 954-932-7378 (RTI)

PA Registered Programs: Group Models only

PA Heavy and Highway Contractors Bargaining Asso., PA009670001 – Have both occupations, showing as non-union
Mark Mace, paheavy@comcast.net, (724) 746-0647

Ft. Washington Operating Engineers, PA006650002, Union, Only has heavy equipment operator
Lisa Marie, lisa.pacetti@iuoe542.com, (215) 591-5282

(PITTS) WESTERN PA OPERATING ENGINEERS, PA013640003; Union, Only has heavy equipment operator
Renee Aiken, raiken@wpaoperators.org, Phone: (724) 668-2244 Ext: 300 (Sponsor)

Best regards,

Chelsie Pineiro Cordero | Southeastern Apprenticeship and Training Representative (ATR)
Apprenticeship and Training Office (ATO)
Pennsylvania Department of Labor & Industry | Workforce Development
4800 E. Street Road #50, Treose, PA 19053
Office: 215.485.3985
ATO Hotline: 717.787.6997
Cpineiroco@pa.gov

The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.

Auxiliary aids and services are available upon request to individuals with disabilities.
Equal Opportunity Employer Program

Sponsors!
Want to attend our next quarterly sponsor meeting? Email your ATR or Apprenticeship@pa.gov
Want to start a Registered Apprenticeship program or add an occupation to an existing program? Click here.
Need Apprenticeship resources? Click here.

Associated Builders & Contractors Keystone Chapter

This is to certify that

Rafael Cortes-Zavala

*has satisfactorily fulfilled the requirements for Graduation as prescribed by the
Apprenticeship & Craft Training Committee of the
Associated Builders & Contractors, Keystone Chapter
and is therefore awarded this Certificate of Academic Completion
for the trade of*

Construction Craft Laborer

Awarded this 20th day of May 2021


William Lasteringer
Apprenticeship Committee Chair

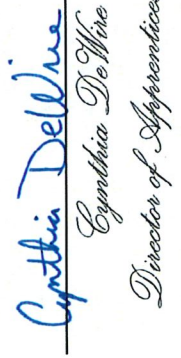

Cynthia DeWine
Director of Apprenticeship



EXHIBIT C

Evidence of Unavailability of Registered Apprenticeship Programs for Applicable Craft Classifications

Based on 2025 PA Apprenticeship Report (RAPIDS Data through December 31, 2024)

PURPOSE

This exhibit documents the registered apprenticeship programs available in Pennsylvania for each craft classification relevant to the subject project, identifies the sponsoring organizations and their union or non-union affiliation, and demonstrates the geographic and access limitations that prevent Petitioner from satisfying apprenticeship ratio requirements.

PART 1: PROGRAMS WITH DOCUMENTED COMPLETER HISTORY (RAPIDS DATA)

HEAVY EQUIPMENT OPERATOR (Operating Engineers and Other Construction Equipment Operators)

Statewide Registered Starters Since 2014: 1,346

Program Name	Affiliation	Geographic Area	Completers Since 2014	Access
Western PA Operating Engineers JATC	Union (IUOE)	Western PA	614	Union-signatory employers only
Ft. Washington Operating Engineers	Union (IUOE)	Southeastern PA	270	Union-signatory employers only
ABC Keystone Apprenticeship Trust	Non-union (Merit Shop)	Central PA (Manheim)	See RAPIDS	Open to ABC member employers
ABC Eastern PA Apprenticeship Trust	Non-union (Merit Shop)	SEPA (Harleysville/Allentown)	See RAPIDS	Open to ABC member employers
One (1) company-sponsored closed program (per PA L&I)	Non-union (Closed)	SEPA region	Limited	Single employer only

CONSTRUCTION CRAFT LABORER

Statewide Registered Starters Since 2014: 860

Program Name	Affiliation	Geographic Area	Completers Since 2014	Access
Philadelphia-area Bricklayers and Allied Crafts (laborers classification)	Union (BAC)	Philadelphia metro	160	Union-signatory employers only
Western PA Laborers JATC	Union (LiUNA)	Western PA	101	Union-signatory employers only
Eastern PA Laborers Training Center	Union (LiUNA)	Eastern PA	See RAPIDS	Union-signatory employers only
ABC Keystone Apprenticeship Trust	Non-union (Merit Shop)	Central PA (Manheim)	See RAPIDS	Open to ABC member employers
ABC Eastern PA Apprenticeship Trust	Non-union (Merit Shop)	SEPA (Harleysville/Allentown)	See RAPIDS	Open to ABC member employers

CEMENT MASON / CONCRETE FINISHER

Statewide Registered Starters Since 2014: 525

Program Name	Affiliation	Geographic Area	Completers Since 2014	Access
Cement Masons Local Union 592	Union (OPCMIA)	Philadelphia metro	137	Union-signatory employers only
Pittsburgh Cement Masons Local 526 JATC	Union (OPCMIA)	Pittsburgh metro	97	Union-signatory employers only

TRUCK DRIVER (STANDALONE)

Statewide Registered Starters Since 2014: Not ranked in top 100 completing programs

No standalone Truck Driver apprenticeship program appears among the top 100 completing programs in Pennsylvania. No separately registered, free-standing program accessible to open-shop contractors with documented completers was identified.

PART 2: CRAFT CLASSIFICATIONS WITH NO REGISTERED APPRENTICESHIP PROGRAM

The following craft labor designations are commonly encountered in public works contracts covered by RCO provisions. No PA L&I or USDOL registered apprenticeship program with a meaningful completer history was identified for any of the following classifications:

Craft Classification	PA L&I Registered Program?	USDOL Registered Program?
Landscape Laborer / Landscape Construction Worker	None identified	None identified
Highway / Site Laborer (general, outside union-affiliated heavy highway programs)	None identified	None identified
Erosion and Sediment Control Installer	None identified	None identified
Demolition Worker (non-structural)	None identified	None identified
Traffic Control / Flagger	None identified	None identified
Pipe Layer (gravity and pressure mainline, outside union programs)	None identified	None identified
Utility Locating Technician	None identified	None identified
Stormwater Management Installer	None identified	None identified
Turf and Green Space Maintenance Worker	None identified	None identified

PART 3: ADDITIONAL PROJECT-SPECIFIC CLASSIFICATIONS

[Petitioner should list any additional craft classifications required on the subject project for which no registered apprenticeship program was identified.]

Craft Classification	PA L&I Registered Program?	USDOL Registered Program?

Source: Keystone Research Center, *Apprenticeship in Pennsylvania (March 2025)*; U.S. DOL RAPIDS data through December 31, 2024; PA L&I Apprenticeship and Training Office; direct communication with PA L&I representative.

EXHIBIT D

Supporting Data on Small Business Workforce Composition

Petitioner's Workforce Profile and Operational Capacity

COMPANY PROFILE

Company Name: Jurich, Inc.

Year Established: 2 1987

Years of Continuous Operation:
39

Principal Office Address: 80 Clayton Park Drive Glen Mills, PA 19342

Number of Full-Time Employees (Current):
15

Number of Craft Labor Employees (Current):
12

Number of Supervisory / Management Employees:
3

Annual Gross Revenue Range (check one)::

- Under \$1 million
- \$1 million – \$5 million
- \$5 million – \$10 million
- \$10 million – \$25 million
- Over \$25 million

SBA SMALL BUSINESS STATUS

- Petitioner qualifies as a small business under SBA size standards for NAICS 237 (Heavy and Civil Engineering Construction): annual receipts not exceeding \$39.5 million
- Petitioner qualifies as a small business under SBA size standards for NAICS 238 (Specialty Trade Contractors): annual receipts not exceeding \$19.0 million
- Petitioner is a certified Small Diverse Business (SDB) or Small Business Enterprise (SBE) under PA DGS

* Application in process to SDB.

CURRENT WORKFORCE COMPOSITION BY CRAFT CLASSIFICATION

Craft Classification	Total Workers	Avg. Years Experience	Workers Age 40+	Workers with Formal Apprenticeship	Workers with Company Training
Heavy Equipment Operator	3	10+	2	NA	3
Construction Craft Laborer	3	7+	0	1	3
Cement Mason / Finisher	2	7+	0	NA	2
Truck Driver	2	10+		NA	2
Pipe Layer	*				
Landscape Laborer					
Flagger / Traffic Control	*				
Other:					
TOTAL					

* some employees have multiple classifications

OPERATIONAL CAPACITY LIMITATIONS

Petitioner certifies the following operational limitations relevant to apprenticeship ratio compliance:

- Petitioner does not have a dedicated human resources or compliance department
- Petitioner does not have the supervisory capacity to simultaneously train and supervise apprentices at the ratios demanded by the RCO while maintaining project quality and safety
- Petitioner's typical project duration is less than 8 weeks, insufficient to provide meaningful apprenticeship training hours
- Petitioner typically operates on 5 projects simultaneously across multiple municipalities, making per-project ratio compliance logistically impossible
- Petitioner's annual work volume does not provide continuous, year-round employment sufficient to carry an apprentice through a multi-year program (*work varies*)

NARRATIVE STATEMENT (OPTIONAL)

JURICH, Inc. is a locally owned and operated heavy civil and utility contractor serving Southeastern Pennsylvania, now in its third generation of family leadership. For thirty-nine years, the company has built its reputation on deploying small, highly skilled crews of long-tenured craft workers who bring decades of field experience to every project. Our workforce model is intentionally lean — we do not operate large, rotating labor pools. Instead, we maintain tight-knit teams whose members have worked together for years, know each other's capabilities, and function with the efficiency and safety awareness that only comes from sustained, shared experience on demanding jobsites.

Our office operations are structured to directly support our field crews with responsive project management, accurate estimating, proactive scheduling, and real-time coordination with owners, engineers, and inspectors. This integrated office-to-field connection allows us to punch well above our weight class on complex projects, delivering the kind of attentive, problem-solving execution that larger contractors cannot replicate with transient workforces and layered management structures.

JURICH, Inc. has earned its standing in this market the only way a small contractor can — by consistently delivering exceptional results, project after project, for owners and engineers who trust us to solve their most difficult problems. That trust is not built on credentials hanging on a wall. It is built on four decades of showing up, performing, and leaving every jobsite better than we found it. Our workers are the reason for that trust, and every one of them developed their skills through years of hands-on experience under the direct mentorship of the generation before them — the very model of workforce development that apprenticeship programs seek to formalize, practiced here long before any ordinance required it.

CERTIFICATION

I certify that the workforce composition data and operational information set forth above are true and correct to the best of my knowledge, information, and belief.

Signature: 

Printed Name and Title: Dewey Jurich V.P.

Date: 3/30/26

EXHIBIT E

Relevant Worker Qualifications and Experience Summaries

Anonymized Craft Worker Profiles Demonstrating Equivalent Competency

INSTRUCTIONS

Complete one Worker Profile form for each craft worker whose qualifications are being presented as evidence that Petitioner's workforce meets or exceeds the competency standards associated with registered apprenticeship program completion. Worker names may be anonymized for initial submission; Petitioner will provide full identification upon request by the Authority.

WORKER PROFILE #1

Worker Identifier (Name or Code):

P.C.

Craft Classification: Heavy Equipment Operator

Age: 38

Years of Experience in Classification:

20

Year Entered the Trade: 2004

Current Role / Title with Petitioner:

Foreman / Operator

Years Employed by Petitioner: 5

CERTIFICATIONS AND TRAINING HELD:

- OSHA 10-Hour Construction Safety and Health
- OSHA 30-Hour Construction Safety and Health
- HAZWOPER 40-Hour (or annual 8-hour refresher)
- First Aid / CPR (current)
- Confined Space Entry
- Trench Safety / Competent Person
- Erosion and Sediment Control
- PennDOT Flagger Certification

- Equipment-specific operator certification(s): _____
- NCCCO Crane Operator Certification (if applicable)
- CDL (Class and endorsements): CDL-A
- Other: _____

RELEVANT WORK HISTORY SUMMARY:

Employer	Dates	Craft Classification	Notable Projects
PDP, LLC	7/1/05 - 10/1/20	FM/ Operator/ Lab	Multiple P.W. Projects / utilities
Family	6/1/03 - 7/1/05	Operator/ Lab	Farm Const Projects

SUPERVISOR ASSESSMENT OF COMPETENCY:

- Meets journeyworker-level competency in assigned classification
- Exceeds journeyworker-level competency in assigned classification

Assessed By (Supervisor Name and Title):

Devey Surich

Assessment Date: 1/30/26

REASON WORKER DOES NOT HOLD FORMAL APPRENTICESHIP CREDENTIAL:

- No registered apprenticeship program existed in this classification in worker's geographic area when worker entered the trade
- Worker entered the trade before widespread availability of registered programs
- Worker developed competency through on-the-job training and employer-sponsored education
- Registered program was union-exclusive and inaccessible to non-signatory employers
- Other: _____

WORKER PROFILE #2

Worker Identifier (Name or Code):

D.B.

Craft Classification:

Laborer CL2

Age:

34

Years of Experience in Classification:

7

Year Entered the Trade:

8

Current Role / Title with Petitioner:

Laborer CL2

Years Employed by Petitioner:

5

CERTIFICATIONS AND TRAINING HELD:

- OSHA 10-Hour Construction Safety and Health
- OSHA 30-Hour Construction Safety and Health
- HAZWOPER 40-Hour (or annual 8-hour refresher)
- First Aid / CPR (current)
- Confined Space Entry
- Trench Safety / Competent Person
- Erosion and Sediment Control
- PennDOT Flagger Certification
- Equipment-specific operator certification(s): _____
- NCCCO Crane Operator Certification (if applicable)
- CDL (Class and endorsements): _____
- Other: _____

RELEVANT WORK HISTORY SUMMARY:

Employer	Dates	Craft Classification	Notable Projects
<u>Hensel + Hensel</u>	<u>2/1/2019 - 8/2021</u>	<u>Laborer</u>	
<u>S+S Cabinets</u>	<u>1/1/2018 - 2/1/19</u>	<u>Laborer</u>	

SUPERVISOR ASSESSMENT OF COMPETENCY:

- Meets journeyworker-level competency in assigned classification
- Exceeds journeyworker-level competency in assigned classification

Assessed By (Supervisor Name and Title):

Dewey Jurich

Assessment Date: 1/23/26

REASON WORKER DOES NOT HOLD FORMAL APPRENTICESHIP CREDENTIAL:

- No registered apprenticeship program existed in this classification in worker's geographic area when worker entered the trade
- Worker entered the trade before widespread availability of registered programs
- Worker developed competency through on-the-job training and employer-sponsored education
- Registered program was union-exclusive and inaccessible to non-signatory employers
- Other: _____

WORKER PROFILE #3

Worker Identifier (Name or Code):

R.F.

Craft Classification:

Truck Driver 2

Age:

57

Years of Experience in Classification:

17

Year Entered the Trade:

20

Current Role / Title with Petitioner:

Truck Driver 2

Years Employed by Petitioner:

4

CERTIFICATIONS AND TRAINING HELD:

- OSHA 10-Hour Construction Safety and Health
- OSHA 30-Hour Construction Safety and Health
- HAZWOPER 40-Hour (or annual 8-hour refresher)
- First Aid / CPR (current)
- Confined Space Entry
- Trench Safety / Competent Person
- Erosion and Sediment Control
- PennDOT Flagger Certification
- Equipment-specific operator certification(s): _____
- NCCCO Crane Operator Certification (if applicable)
- CDL (Class and endorsements): CDL A
- Other: _____

RELEVANT WORK HISTORY SUMMARY:

Employer	Dates	Craft Classification	Notable Projects
<u>Horsen Bros</u>	<u>3/96 - 2/2009</u>	<u>Truck Driver</u>	<u>Many</u>
<u>Vulpe Exp.</u>	<u>2/2009 - 4/2017</u>	<u>Truck Driver</u>	<u>Many</u>

SUPERVISOR ASSESSMENT OF COMPETENCY:

- Meets journeyworker-level competency in assigned classification
- Exceeds journeyworker-level competency in assigned classification

Assessed By (Supervisor Name and Title):

_____ Dewey Jurich _____

Assessment Date: _____ 1/31/26 _____

REASON WORKER DOES NOT HOLD FORMAL APPRENTICESHIP CREDENTIAL:

- No registered apprenticeship program existed in this classification in worker's geographic area when worker entered the trade
- Worker entered the trade before widespread availability of registered programs
- Worker developed competency through on-the-job training and employer-sponsored education
- Registered program was union-exclusive and inaccessible to non-signatory employers
- Other: _____

EXHIBIT F

Copies of Bid Documents Reviewed for Compliance Disclosure Completeness

Checklist of Required RCO Compliance Disclosures in Bid Package

INSTRUCTIONS

Petitioner has reviewed the bid documents issued by the Authority for the subject project to determine whether all material apprenticeship ratio compliance obligations have been fully disclosed as required by 62 Pa. C.S. Section 512(b) and Pennsylvania competitive bidding law. The following checklist documents Petitioner's review findings.

Project Name / Bid Reference: Rebid Observatory Hill Recreation Area Phase 1
 Contracting Authority: Upper Darby Township
 Bid Advertisement Date: See Pen Bid
 Bid Submission Deadline: 04/22/26
 Bid Documents Reviewed By: Dff
 Date of Review: 04/22/26

COMPLIANCE DISCLOSURE CHECKLIST

For each item, indicate whether the required disclosure is present in the bid documents:

Item	Required Disclosure	Present in Bid Docs?	Page / Section Reference
(a)	Specific apprenticeship ratio applicable to each craft classification separately, expressed as an explicit numerical requirement (e.g., 1 apprentice per 4 journeyworkers)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	.18/10
(b)	Specific form or certification by which a contractor documents initial compliance at the time of bid submission, identifying each covered craft and the	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	NA

	apprenticeship program enrolled		
(c)	Form, frequency, and content of ongoing compliance reporting during project execution (weekly, biweekly, monthly, or other defined interval)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
(d)	Specific documentation the contractor must provide to verify each worker's registered apprentice status (name, program sponsor, RAPIDS enrollment number, current program stage, craft classification)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
(e)	Process by which the Authority will independently verify each claimed apprentice's registration with PA L&I or USDOL OA, including whether the Authority will cross-reference against the RAPIDS database	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
(f)	Definition of when a ratio deficiency constitutes a contract breach, the notice procedure, the cure period, and the specific contractual remedies that will apply	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
(g)	Good-faith-effort waiver procedure available when registered apprentices in the required classification cannot be located despite documented recruitment efforts	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
(h)	Payment withholding or other sanction mechanism the Authority will exercise if ratio compliance cannot be demonstrated during any monitoring interval	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

EXHIBIT G

Petitioner's Company-Sponsored Journeyworker Competency and Continuing Education Program

Written Program Documentation, Training Records Summary, and Individual Employee Competency File Index

PART 1: PROGRAM OVERVIEW

Company Name: Junich, Inc.

Program Name: Craft Journeyman Program

Year Program Established: 2026

Program Administrator / Responsible Person: Dewey Junich

Number of Craft Employees Currently Enrolled: 11

PART 2: WRITTEN COMPETENCY STANDARDS

The Competency Program establishes written performance and knowledge standards for the following craft classifications:

Craft Classification	USDOL O*NET Code Reference	Written Standard on File?
Heavy Equipment Operator	47-2073.00	<input type="checkbox"/> Yes <input type="checkbox"/> No
Construction Laborer	47-2061.00	<input type="checkbox"/> Yes <input type="checkbox"/> No
Cement Mason / Concrete Finisher	47-2051.00	<input type="checkbox"/> Yes <input type="checkbox"/> No
Truck Driver, Heavy/Tractor-Trailer	53-3032.00	<input type="checkbox"/> Yes <input type="checkbox"/> No
Pipelayer	47-2151.00	<input type="checkbox"/> Yes <input type="checkbox"/> No
Landscaping and Groundskeeping	37-3011.00	<input type="checkbox"/> Yes <input type="checkbox"/> No

PART 3: MANDATORY CONTINUING EDUCATION REQUIREMENTS

Training / Certification	Required For	Frequency
OSHA 10-Hour Construction Safety and Health	All craft employees	Upon hire + as needed

OSHA 30-Hour Construction Safety and Health	Supervisory / lead personnel	Upon promotion + as needed
Annual OSHA Safety Refresher Training	All craft employees	Annually
Equipment-Specific Operation and Safety Training	Equipment operators	Per new equipment assignment
Erosion and Sediment Control Practices	All field personnel	Annually or per project
Stormwater Management Compliance	All field personnel	Annually or per project
HAZWOPER Training (40-hr initial / 8-hr refresher)	Designated personnel	Annual refresher
Jobsite-Specific Hazard Recognition	All field personnel	Prior to project mobilization
Toolbox Talks (documented)	All field personnel	Weekly or per project schedule
First Aid / CPR	Designated personnel	Per certification cycle
Confined Space Entry	Designated personnel	Per certification cycle
Trench Safety / Competent Person	Designated personnel	Per certification cycle

PART 4: SAFETY RECORD

Years of Continuous Operation:

39

Approximate Number of Projects Completed:

1000 +

Number of OSHA Citations (all time):

0

Number of OSHA Violations (all time):

0

Current Experience Modification Rate (EMR):

1.05

OSHA Recordable Incident Rate (most recent 3 years):

1.0

Days Away, Restricted, or Transferred (DART) Rate:

1.5

Number of Litigation Claims Arising from Workmanship or Performance:

0

PART 5: EQUIPMENT CERTIFICATION AND OPERATOR QUALIFICATION RECORDS

Petitioner maintains individual operator qualification records for each piece of equipment by type and weight class. Records include:

- Equipment type and model documentation
- Operator evaluation records per machine assignment
- NCCCO certifications (where applicable)
- CDL records and endorsements
- Equipment-specific safety training documentation

PART 6: INDIVIDUAL EMPLOYEE COMPETENCY FILE INDEX

The following table indexes the individual competency files maintained for each craft employee. Full files are available for Authority inspection upon request.

Employee ID	Craft Classification	Years with Company	Training Records on File	Safety Certs Current	Last Competency Review
	To Be Provided if Awarded				
	LABORER		3		
	OPERATOR		2		
	Truck Driver		2		
	Mason		1		

[Continue table as needed for all craft employees]

EXHIBIT H

Additional Supporting Materials

Index of Supplemental Documentation

INSTRUCTIONS

Use this exhibit to index and attach any additional supporting materials not covered by Exhibits A through G. Examples include news articles documenting RCO impacts, municipal correspondence, economic analyses, expert reports, or other relevant documentation.

INDEX OF ADDITIONAL MATERIALS

Sub-Exhibit	Document Title / Description	Source / Author	Date
H-1	WFMZ.com: Northampton County RCO hearing report (Commissioner Cusick 'outhouse' quote)	WFMZ.com	Sept. 2023
H-2	PA Capital-Star: Allentown RCO debate (council member Affa cost concerns; 24 companies ineligible)	PA Capital-Star	March 2022
H-3	StateCollege.com: State College RCO qualified bidder shortage	StateCollege.com	July 2025
H-4	Allan Myers, L.P. v. Dept. of Transportation, 202 A.3d 205 (Pa. Commw. Ct. 2019) — Full Opinion	CourtListener / Westlaw	Jan. 2019
H-5	DVRPC FY2025 TIP for Pennsylvania — General Overview Chapter (confirming \$8.1B / 4 years)	DVRPC	July 2024
H-6	PennDOT District 6 Construction Preview (2024 season projects and spending)	PennDOT	2024
H-7	ABC Keystone — Apprenticeship Program Information (trades offered,	ABC Keystone	Current

	registration status)		
H-8	ABC Eastern PA — Apprenticeship Program Information	ABC Eastern PA	Current
H-9	PA L&I — Documentation of telephone conference re: non-union operator programs in SEPA region	Petitioner's records	03/09/2026
H-10	Econsult Solutions / Building Trades — RCO adoption reference document for SE PA jurisdictions	Econsult Solutions	2024
H-11			

NOTE: Petitioner reserves the right to supplement this exhibit with additional materials as circumstances may require. Materials are organized in the order listed above.

EXHIBIT I

DOCUMENT IDENTIFICATION

ABC Eastern Pennsylvania Chapter Membership Confirmation Letter (Danielle Hart, Regional Director of Membership Services, January 19, 2024) confirming Petitioner's membership in good standing and access to ABC-EP Apprenticeship Trust programs (Program ID PA00667005)



January 19, 2024

To Whom it may Concern:

I am writing this letter to confirm and certify that JURICH, Inc.

- is a current member of Associated Builders & Contractors Eastern Pa Chapter and has access to our apprenticeship program.
- The Associated Builders & Contractors Eastern Pennsylvania Apprenticeship Trust (“ABC-EP Apprenticeship Trust”) is approved and registered to operate as a Registered Apprenticeship Program by the Pennsylvania Apprenticeship Training Council (“PATC”), a department of the Pennsylvania Department of Labor and Industry and the Federal Department of Labor.

The ABC-EP Apprenticeship Trust’s program identification number is PA00667005. The ABC-EP Apprenticeship Trust has been operating continuously as a bona fide, certified Apprenticeship Training Program since 1967, and has graduated students from apprentice to journeyman status since 1971 to the present.

As a member in good-standing of the Associated Builders & Contractors Eastern Pennsylvania Chapter (the “ABC-EP Chapter”) JURICH, Inc. participates in and has access to apprenticeship programs administered through the ABC-EPA Apprenticeship Trust.

ABC Eastern Pa chapter to include the Keystone chapter has graduated journeymen within 3 or more of the last 5 years.

Regards,

Danielle Hart

Danielle Hart

Regional Director of Membership Services

East Norriton Office; 430 W. Germantown Pike, East Norriton, PA 19403 | 610.279.6666 Allentown Office; 894 Marcon Boulevard, Suite 110, Allentown, PA 18109 | 610.821.9686