



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive
Public Works Resource

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August 10, 2022

Brent Parton, Principal Deputy Assistant Secretary
Employment and Training Administration
200 Constitution Ave NW
Washington, DC 20210

Re: Request for Comments on Occupational Code Assignment form (ETA 741)

Dear Principal Deputy Assistant Secretary Parton,

On behalf of the more than 30,000 members of the American Public Works Association (APWA), we appreciate the opportunity to submit comments to the Employment and Training Administration regarding its proposed information collection request related to the Occupational Code Assignment form (ETA 741).

As our nation faces monumental workforce shortages across all vocations, and with the implementation of the historic *Infrastructure Investment and Jobs Act* (IIJA) underway, it is vital for job seekers to be aware of, and have access to, information about the wide breadth of professional opportunities available within the public works industry. To that end, APWA strongly supports including public works occupations in the O*NET database as a centralized career cluster. While the database includes several occupations which fall under the public works umbrella, it does not comprehensively group them together. A uniform cluster would allow individuals to realize the wide array of professions within the broader public works sphere and would serve to facilitate a greater understanding of the impact public works has on the lives of every American and demonstrate that a career in public works can be both personally rewarding and have tremendously positive impacts on our communities. This [chart](#) offers an example of the wide array of public works careers.

There exists precedent for public works professionals having legal recognition, which is a positive step in the direction of enshrining public works jobs in both law and the public consciousness. [Homeland Security Presidential Directive 8/HSPD-8](#), which states in part under Definitions 2(d) "The term "first responder" refers to those individuals who in the early stages of an incident are responsible for the protection and preservation of life, property, evidence, and the environment, including emergency response providers as defined in section 2 of the Homeland Security Act of 2002 (6 U.S.C. 101), as well as emergency management, public health, clinical care, public works, and other skilled support personnel (such as equipment operators) that provide immediate support services during prevention, response, and recovery operations."

PRESIDENT
Stan Brown, P.E., PWLF

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE



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Further, APWA successfully secured a definition of what constitutes a public works agency within **Sec. 50211. Water Infrastructure and Workforce Investment** of IIJA, which reads that the term 'public works department or agency' means a 'political subdivision of a local, county, or regional government that designs, builds, operates, and maintains water infrastructure, sewage and refuse disposal systems, and other public water systems and facilities.'

APWA is also proud to offer extensive education and credentialing programs aimed at facilitating increased knowledge and expertise across public works, as well as certification programs, which provide strong benefits to public works by promoting experience and excellence resulting in a skilled and robust workforce.

As the Employment and Training Administration engages with stakeholders about the Occupational Code Assignment Form, as well as other SOC-related topics, APWA would welcome the opportunity to provide input both about public works professions generally, and more specifically about the professional credentialing APWA provides.

Thank you again for this opportunity to provide input for consideration in updating the Occupational Code Assignment form. Please reach out to Jeff Finegan, APWA Government Affairs Associate, at jfinegan@apwa.net for any questions or additional information about APWA.

Sincerely,

A handwritten signature in blue ink, reading "Scott Grayson". The signature is fluid and cursive, with the first name "Scott" and last name "Grayson" clearly visible.

Scott Grayson, CAE
Chief Executive Officer

A handwritten signature in blue ink, reading "Stan Brown". The signature is bold and cursive, with the first name "Stan" and last name "Brown" clearly visible.

Stan Brown, PE, PWLF
APWA President

PRESIDENT
Stan Brown, P.E., PWLF

CHIEF EXECUTIVE OFFICER
Scott D. Grayson, CAE