

MID-AMERICA REGIONAL BARGAINING ASSOCIATION

Comments to the Treasury Department of the Treasury and the Internal Revenue Service
Request for Comments on Prevailing Wage, Apprenticeship, Domestic Content, and Energy
Communities Requirements under the Act Commonly Known as the Inflation Reduction Act of
2022

Notice 2022-51
November 4, 2022

The **MID-AMERICA REGIONAL BARGAINING ASSOCIATION** (aka MARBA) is writing to express its support of the comments submitted by the Indiana, Illinois, Iowa Foundation for Fair Contracting (III FFC) and Apprenticeship Skills Improvement Program (ASIP) concerning the Department of Treasury (Treasury Department) and Internal Revenue Service (IRS) Notice 2022-51, Request for Comments on Prevailing Wage, Apprenticeship, Domestic Content, and Energy Communities Requirements Under the Act Commonly Known as the Inflation Reduction Act of 2022 (IRA).

MARBA is based in Des Plaines, IL and represents seven (7) trade associations in the Chicagoland area including the Illinois Road and Transportation Builders Association, Chicagoland Associated General Contractors, Underground Contractors Association of Illinois, Great Lakes Construction Association, Mason Contractors Association of Greater Chicago, and Chicagoland Crane Association. The seven trade associations MARBA represents count as its members hundreds of construction firms in the Chicagoland area that employ upwards of 50,000 tradesmen and women who are responsible for repairing and building infrastructure projects throughout the Chicagoland area for several decades. Some of these firms can even trace their roots back over a century.

The construction firms signatory to the MARBA collective bargaining agreements employ highly skilled union construction workers who are members of various trade unions including, but not limited to, Operating Engineers, Laborers, Carpenters, Cement Masons, Bricklayers, Auto Mechanics, Technical Engineers, and Teamsters. The firms employ tradespeople who have received advanced training through joint labor-management apprenticeship school and facilities, logging thousands of hours improving their skills in their respective trades. The success of these employers is a direct result of the skill and productivity of the tradespeople they employ.

With the historic passage of the Infrastructure Investment and Jobs Act and the first proposed updates to the Davis-Bacon Act regulations in nearly forty years, it is crucial that IRA guidance for tax credits as it relates to prevailing wage and apprenticeship standards are implemented responsibly and efficiently.

Accordingly, we encourage guidance consistent with the III FFC and ASIP comments. Thank you for the opportunity to comment on this guidance.

Sincerely,



Aaron Janik
Executive Director