



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive  
Public Works Resource

[www.apwa.org](http://www.apwa.org)

1200 Main Street, Suite 1400  
Kansas City, MO 64105-2100  
816-472-6100 800-848-2792  
fax 816-472-1610

25 Massachusetts Ave NW  
Suite 500A  
Washington, DC 20001  
202-408-9541

December 19, 2024

José Javier Rodríguez, 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 Assistant Secretary Rodríguez,

On behalf of the more than 32,000 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 continues to face significant workforce shortages across all vocations, and with the ongoing implementation of the *Infrastructure Investment and Jobs Act* (IIJA), and the workforce needed to support its success, it is vital job seekers are 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

PRESIDENT  
Dominick A. Longobardi

CHIEF EXECUTIVE OFFICER  
Scott D. Grayson, CAE



AMERICAN PUBLIC WORKS ASSOCIATION

Your Comprehensive  
Public Works Resource

[www.apwa.org](http://www.apwa.org)

1200 Main Street, Suite 1400  
Kansas City, MO 64105-2100  
816-472-6100 800-848-2792  
fax 816-472-1610

25 Massachusetts Ave NW  
Suite 500A  
Washington, DC 20001  
202-408-9541

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.”

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 offers extensive education and credentialing programs that facilitate increased knowledge and expertise across public works, as well as certification programs, providing experience and excellence supporting a skilled and robust workforce. Additionally, in 2022, APWA, the American Council of Engineering Companies (ACEC), and the American Society of Civil Engineers (ASCE), established the *Engineering and Public Works Roadshow*, recognizing outstanding and impactful engineering and public works infrastructure projects and showcasing the workforce needed to design, build, operate and maintain them. These projects contribute to their local community’s economic and social advancement. From the Roadshow has sprung the *Engineering Workforce Consortium*, a forum to exchange best practices, promote a fully funded and stood up workforce, and promote careers in engineering and public works. These steps, among others, are symbolic of APWA’s commitment to offering solutions and being a part of this encompassing, critical conversation at the national level.

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. APWA previously weighed-in with ETA on this subject in August, 2022.

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 Specialist, at [jfinegan@apwa.org](mailto:jfinegan@apwa.org) for any questions or additional information about APWA.

PRESIDENT  
Dominick A. Longobardi

CHIEF EXECUTIVE OFFICER  
Scott D. Grayson, CAE



AMERICAN PUBLIC WORKS ASSOCIATION

**Your Comprehensive  
Public Works Resource**

[www.apwa.org](http://www.apwa.org)

1200 Main Street, Suite 1400  
Kansas City, MO 64105-2100  
816-472-6100 800-848-2792  
fax 816-472-1610

25 Massachusetts Ave NW  
Suite 500A  
Washington, DC 20001  
202-408-9541

Sincerely,

A handwritten signature in black ink, reading "Scott D. Grayson". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Scott Grayson, CAE  
Chief Executive Officer

A handwritten signature in black ink, reading "Dominick A. Longobardi". The signature is cursive and somewhat stylized, with a prominent "D" and "L".

Dominick A. Longobardi  
APWA President

PRESIDENT  
Dominick A. Longobardi

CHIEF EXECUTIVE OFFICER  
Scott D. Grayson, CAE