

# 2024 National *Policy Agenda*



# Dear Policymakers:

As you consider legislation and initiatives that promote economic growth and stability, the Window and Door Manufacturers Association (WDMA) presents a comprehensive policy framework that addresses the numerous challenges confronting American manufacturers in the residential and commercial construction markets. WDMA is the premier trade organization representing the window, door and skylight industry. Our 2024 National Policy Agenda not only pinpoints key priorities but also presents viable solutions designed to strengthen the U.S. economy, improve the national supply chain, address nationwide labor shortages, and bolster America's housing industry.

WDMA is eager to collaborate with Congress and the Administration to develop sensible and effective policies on issues ranging from housing, energy and trade policy to workforce development and worker safety. As an essential part of the national supply chain for residential and commercial construction, WDMA is focused on tackling economic challenges. This involves advocating for federal initiatives that not only bolster American manufacturers but also foster pro-growth policies and competitive regulatory conditions.

Home ownership remains the cornerstone of the American dream, but our nation is facing an affordable housing crisis that is mounting due to uncertain economic conditions, high interest rates, and record inflationary pressure. Congress and the White House should prioritize issues which impact housing affordability to ensure that hard-working Americans have a practical path to home ownership.

Further, we urge the federal government to work with stakeholders and advance policies that promote affordable energy-efficient windows, doors and skylights as a powerful tool to reduce carbon emissions and spur job creation. We

estimate there are nearly one billion single-pane, energy-inefficient windows in existing housing stock in need of replacement. A national energy policy that includes energy efficiency targets should capture the gains that would be realized by replacing those windows, as well as inefficient doors and skylights, with more efficient products. Incentives that recognize all credible green building programs can also play an important role in expanding the market for energy efficient windows, doors and skylights.

It is also imperative that we reform our regulatory system to spare manufacturers from exhausting time and resources on complying with inefficient, duplicative, and unnecessarily burdensome regulations. By reducing the costs of state and federal regulations, American manufacturers can enhance their competitiveness by investing more resources into expanding employee benefits and hiring more workers while advancing research and development initiatives. Our manufacturers are committed to sensible regulatory reforms that strike a balance with reasonable, affordable, and rational protections for the environment that ensure public health and safety, while also promoting economic growth and job creation.

WDMA's 2024 National Policy Agenda serves as a guide and resource for policymakers to address the biggest challenges impacting manufacturers and improve the national economic climate for housing markets. We look forward to continuing our work with Congress and the White House to develop and implement meaningful policies that create conditions necessary for an expanding economy, a growing workforce, a reduction in unnecessary regulatory barriers for manufacturers, and fortification of the national supply chain for materials that are critical to the window, door and skylight industry.

Sincerely,

**Emily Videtto**

*WDMA Chair*

*Executive Vice President of Sales & Marketing, Pella Corporation*



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# Energy Conservation

WDMA's manufacturers are leaders in the energy efficiency movement, developing innovative technologies to cost-effectively produce durable energy-efficient windows, doors and skylights for both new and replacement construction. We support policies that aim to reduce energy consumption through proven, commercially available technologies targeted to where the most cost-effective improvements can be made. For example, single-pane and clear double-pane (non low-e coated) windows are one of the largest sources of energy consumption in a home, through heat loss in winter and unwanted heat gain in summer. Replacing our nation's nearly one billion single-pane and double-pane clear windows in existing housing stock, with readily available higher efficiency windows, such as ENERGY STAR® certified products, should be a primary objective of remodeling projects and promoted through energy efficiency incentive programs.

It is more beneficial to first replace windows and doors in the aging housing stock with higher efficiency windows and doors, which will minimize the largest source of energy loss in a home and then provide an opportunity for further energy and equipment savings when upgrading with smaller sized heating and cooling equipment. Improving the envelope with code-compliant windows and doors is the first step in responsible carbon reduction. Durable windows, doors and skylights utilizing commercially available technologies offered by WDMA manufacturers should be selected to ensure long-lasting performance. The industry works cooperatively with government and nongovernmental entities to continuously improve building codes, standards, regulations, and programs that will advance the energy efficiency of building envelopes through technologically advanced fenestration products. As state and local governments have taken an increasingly active role in promoting energy-efficient buildings through energy code adoption and incentive programs, the need for a balanced national energy conservation policy is clear.

**Improving the envelope with code-compliant windows and doors is the first step in responsible carbon reduction.**

1. WDMA supports a balanced national energy policy that:
  - Includes energy efficiency as a key component, recognizing the value of reducing home and commercial building energy consumption.
  - Recognizes and supports the replacement of windows, doors and skylights as a cost-effective and proven method of reducing residential and commercial building energy use.
  - Encourages the use of energy-efficient products while taking into account other important considerations such as affordability, durability, return on investment (including life cycle assessment costs) and market availability.
  - Bases energy conservation targets for new construction on sound science, and reasonably achievable and durable technologies that are cost-effective, commercially available and implemented under timelines that can be realistically met by the industry.
  - Encourages programs for the retrofit of windows, doors and skylights into existing homes and buildings to make them more energy efficient based on affordable and cost-effective energy efficiency requirements.
  - Rewards product manufacturers that embrace technology in manufacturing windows, doors and skylights that are both energy efficient and durable.
  - Recognizes all the benefits provided by energy-efficient windows, doors and skylights, in addition to energy conservation, including daylighting and the unique human health and worker productivity benefits it provides, fresh air, comfort, views, and the enhanced indoor environmental quality that results.
2. WDMA supports uniform energy conservation regulation of residential and commercial buildings through the adoption and enforcement of national model energy

# Energy Conservation

conservation codes and standards by states and local jurisdictions that are:

- Developed under nationally recognized accredited consensus procedures that allow for full participation by stakeholders in the development and amendment processes, such as the International Code Council's (ICC) International Energy Conservation Code (IECC) and ASHRAE 90.1.
- Based upon field-proven, commercially available and durable technologies.
- Cost-effective, affordable, material-neutral and practical.
- Based upon regional climatic differences through a limited number of defined climatic zones, such as those established by the IECC, and ASHRAE's 90.1 standard and that provide requirements accordingly in a simplified format.

**3.** WDMA supports the promotion and use of energy-efficient windows, doors and skylights in new construction and for the replacement of inefficient single-pane and clear dual-pane windows, doors and inefficient plastic skylights in existing housing stock.

**4.** WDMA supports incremental improvements to the ENERGY STAR® Residential Windows, Doors and Skylights program that are:

- Based on sound data and analysis.
- Cost-effective, affordable and reflect commercially available technology and that provides consumers with a climate-specific payback on their investment of no more than 10 years.
- Technologically feasible and cost-effective when considering life cycle costs from development, manufacture, commercialization and sale, and implemented under reasonable timelines for manufacturers.
- Developed under a robust and open collaborative process between the Environmental Protection Agency (EPA) and its ENERGY STAR® partners and stakeholders.



**5.** WDMA supports the adoption and implementation of tax credits or other forms of voluntary incentives to encourage the use of energy-efficient building products. These incentives should include energy-efficient window, door and skylight products and technologies that meet reasonable performance standards.

**6.** WDMA supports the adoption and enforcement of the National Fenestration Rating Council (NFRC) rating and certification process as the energy rating system for all residential and commercial fenestration products and systems and supports simplified rating and data programs, the addition of new fenestration ratings as justified, and ratings that focus on complete fenestration products and systems.

**7.** WDMA supports legislation, regulation and financial incentives with market-based and consensus-driven solutions to reduce emissions as we modernize public buildings through energy efficiency upgrades, including replacement windows, doors and skylights.

# Building Codes

Building codes and standards play a fundamental role in ensuring that public health, safety and welfare are adequately provided for in the construction and renovation of residential and commercial buildings. Nearly all jurisdictions in the U.S. regulate building construction through the adoption of nationally recognized model building codes and standards, or codes and standards consistent with them. These codes and standards address every aspect of safe building design and the materials that are used to construct them, including windows, doors and skylights, which provide essential natural light, exterior viewing, ventilation, security, energy conservation, occupant comfort, safety and protection from fire and natural hazards among other benefits. Building codes and standards that govern these components must be based on sound science, practicality, performance and material neutrality, and they must be developed under processes that adequately allow for the participation of all interests and consideration of all concerns to ensure the objectives of providing for public health, safety, and welfare in the built environment are properly met.

## These codes and standards address every aspect of safe building design and the materials that are used to construct them

1. WDMA supports national model building codes that:
  - Are developed and revised under nationally recognized consensus development processes open to participation by all stakeholders, such as those processes used by the International Code Council (ICC).
  - Include requirements for windows, doors and skylights that are appropriate for each product type, justified by sound data/science, can be reasonably met using current technology, and are cost-effective.
  - Include requirements for windows, doors and skylights that do not discriminate against the use of specific product types or are not biased towards specific materials.
2. WDMA supports the Department of Energy's (DOE) participation in the development of national model energy codes and standards and recognizes the Department's role as a technical advisor in it, provided that the Department's participation is fully transparent including:
  - Publication of draft DOE proposed amendments to national model energy codes and standards, as well as the analytical methodologies, justification, feasibility, and other supporting information and data for them, in the Federal Register for public review and comment prior to advancing them.
  - DOE determinations regarding the energy efficiency improvements in national model energy codes and standards are made in full accordance with the direction given the Department to do so under the Energy Conservation and Production Act (ECPA).
  - Fully supported by validated scientific studies and data.
3. WDMA supports legislation that ensures DOE's participation in the national model energy codes and standards development processes is transparent as noted above.
4. WDMA supports nationwide, state, and local adoption and enforcement of consensus-based national model building codes that conform to WDMA building code policy.

# Environmental Stewardship

WDMA member companies are committed to sound stewardship of our natural resources. The manufacturing sector's reliance on affordable energy sources dictates that our national energy policy includes support for alternative and renewable fuels. WDMA believes environmental policies should be based on voluntary, cost-effective actions that strike a balance between the protection of the environment and our domestic manufacturing competitiveness.



1. WDMA supports the use of technologically advanced fenestration products as a key component in the construction and renovation of energy-efficient and green homes and buildings. Financial incentives are an important tool to facilitate the purchase of energy-efficient products for new or existing construction and should be implemented in a way that is cost-effective for the consumer.
2. WDMA supports green building codes, standards and rating systems that are developed and revised under nationally recognized consensus development processes that allow for participation by all stakeholders, and that are based on sound science, cost-effectiveness, feasible technology, and unbiased towards building materials. In addition, WDMA supports the uniform application of rating systems nationwide rather than state and local jurisdictions creating separate and differing requirements or rating systems.
3. WDMA supports the use of credible green building certification programs, codes, standards, and rating systems for federal construction projects that are developed and maintained under nationally recognized, accredited consensus development processes. WDMA opposes the designation of a single program or set of requirements for all federal building projects.
4. WDMA supports sustainable manufacturing facility policies and programs that promote continuous improvement in functional use, as evidenced by registration under ISO 14001 or equivalent standards.
5. WDMA supports promoting the use of durable and sustainable building products and technologies through state or local adoption of voluntary building incentive programs that encourage green building, such as special financing, rebates, or other financial assistance for new construction and energy-efficient remodeling.
6. WDMA supports the creation of financial incentive programs that promote the retrofitting of existing homes and buildings to incorporate sustainable building materials and improved energy conservation features.
7. WDMA supports balanced, scientifically based environmental stewardship policies with measurable and attainable goals for domestic manufacturers, without putting domestic manufacturers at a competitive disadvantage with foreign manufacturers.
8. WDMA believes EPA's Maximum Achievable Control Technology (MACT) rules, including for boilers and surface coating of wood products, should be supported by sound research, ensure consistency across operating parameters and not be overly burdensome for manufacturers.
9. WDMA supports guidelines for performing life cycle assessments (LCAs) and for developing environmental product declarations (EPDs) for windows, doors, skylights and architectural doors that are developed through industry collaboration.

# Building Safety



The proper selection, installation and use of windows, doors and skylights is essential to the safe occupancy of homes and commercial buildings. The materials used to manufacture them must also be safe. Manufacturers are subject to codes, standards and other regulations that govern fire-rated doors, fire-rated and impact-resistant glazing, emergency escape and rescue, window, and skylight opening protection and other window, door, and skylight safety-related issues. Building codes, standards and regulations that govern these issues must be based on sound science, technologically feasible, have proven benefit and developed under processes that adequately allow for participation of all interests and consideration of all concerns to ensure the objectives of public health, safety, and welfare in the built environment are properly met.

1. WDMA supports the inclusion of fire-rated door provisions in national model building codes and supports the use of NFPA 80: Standard for Fire Doors and Other Opening Protectives.
2. WDMA supports efforts to address health-related concerns in the built environment, such as potential exposure to harmful levels of lead and formaldehyde, with approaches that are based on and justified by sound data/science, provide proven benefit, are

technologically feasible, and that consider cost. These approaches should also supersede individual and differing state rules.

3. WDMA supports addressing safety issues, such as window and skylight fall protection, with approaches that are based on and justified by sound data/science, are cost-effective, technologically feasible and balanced with other code provisions related to window, door and skylight safety issues such as emergency escape and rescue. WDMA clearly and unequivocally supports the need for and use of windows as an important secondary means of escape and rescue in an emergency, including fires.
4. WDMA opposes approaches that trade off proven life safety elements for other proposed safety measures such as trading off emergency escape and rescue openings for fire sprinklers.
5. WDMA supports unified national standards for accessibility of the built environment, based on sound technical verification, balanced by practical overall product performance requirements. WDMA supports ANSI A117.1 as the recognized standard for establishing minimum criteria for accessible construction and encourages direct adoption of the most current version of that standard or its criteria into building codes.
6. WDMA supports legislative and regulatory action by EPA on the Lead: Renovation, Repair and Painting (RRP) rule to make compliance less burdensome for contractors while maintaining protections for pregnant women and children under the age of 6 from lead exposure.
  - WDMA believes that EPA should take immediate action to address the unresolved implementation issues identified by WDMA, including the lack of a commercially available compliant lead test kit, flawed economic analyses, and misdirected enforcement.
  - WDMA believes that EPA must identify a lead hazard before proposing any expansion of the RRP rule to cover activities in public and commercial buildings.



# Housing & Economic Policy

WDMA's members support a robust housing policy that is fiscally responsible and ensures healthy housing markets. We believe government policies must continue to promote and preserve the value of homeownership. Access to financing for home purchases and new starts continues to be overly constrained; increasing access to financing for new construction, mortgages and home renovations should be a priority. As home building and renovation activities increase, we believe there will continue to be a strong emphasis on building "green." WDMA supports voluntary consumer incentives that make ENERGY STAR® and other qualified fenestration products more affordable.

1. WDMA supports targeted federal programs that support private sector growth and affordable housing, including:
  - Programs that incentivize use of energy-efficient products in new construction and renovation.
  - Efforts to stimulate the housing industry and to spur demand for new construction and remodeling.

- Fiscally responsible and sound affordable housing programs that make the dream of home ownership available to more Americans.
2. WDMA believes any reform of federal housing programs must include a financial backstop to ensure that 30-year fixed-rate mortgages and reliable mortgage financing remain readily available and affordable.
  3. WDMA actively supports sustainable building incentives that recognize all credible green building programs (e.g., LEED, NGBS, Green Globes), that are product-neutral and that expand the market for energy-efficient window, exterior door, skylight, and architectural door products.
  4. WDMA supports federal regulatory reform legislation, including updates to the Administrative Procedure Act that increases transparency in the development of federal regulations and ensures federal regulation is appropriate, cost-effective, and consensus-based.



# Tax Policy

America's manufacturers are often disadvantaged by the current tax structure. WDMA supports tax reforms that level the playing field to enable our manufacturers to be more competitive and continue to provide jobs. Federal tax policy should not adversely affect manufacturers or their dealer, distributor, contractor and consumer customers. In particular, the mortgage interest deduction (MID) has been a powerful tool to incentivize homeownership, in addition to helping homeowners with property renovations. WDMA will continue to support sound fiscal policies that seek to spur consumer purchases of energy-efficient windows, doors and skylights to increase their use in new construction and retrofitting of existing homes and buildings.

1. WDMA supports tax reform policies that place manufacturers on an equal playing field with foreign competitors and equitable tax treatment of window, door and skylight manufacturers that protect their ability to provide quality jobs in the manufacturing sector.
2. WDMA supports the permanent extension of mortgage and home equity loan interest and real estate deductions that substantially encourage homeownership. WDMA opposes attempts to weaken or eliminate them as they are a cornerstone of American housing policy, which provides benefits to homeowners at all income levels and enjoys overwhelming public support. WDMA opposes any rules increasing taxability of personal residences.
3. WDMA supports maintaining the capital gains exclusion on the sale of a principal residence.
4. WDMA supports tax incentive programs that encourage the use of energy-efficient window, door, and skylight products in new construction and energy-efficient renovations that are based on NFRC-certified ratings or the latest ENERGY STAR® program requirements. WDMA supports qualifications for these tax incentive programs that are uniform and ensure qualified windows, doors and skylights are economically accessible to homeowners of all income levels. WDMA opposes product identification numbers under the Energy Efficient Home Improvement Credit (25C) for eligible windows, doors and skylights that are not based on NFRC Certified Product Directory numbers.
5. WDMA supports the permanent extension of increased Section 179 expensing limits, bonus depreciation and other tax incentives that enable manufacturers to make new capital investments and to recognize the tax benefits of those improvements in a timely manner.
6. WDMA supports preservation of the last-in, first-out (LIFO) accounting principle, the repeal of which would lead to a significant tax increase, decrease in working capital, inaccurate inventory evaluation and reduced competitiveness.
7. WDMA supports estate tax policy that protects the ability of multi-generation, family-owned manufacturers to survive into the next generation.
8. WDMA supports federal tax policy that lowers corporate income tax rates, encourages investment and makes the U.S. more globally competitive.
9. WDMA supports the current federal territorial tax system so that foreign profits, already taxed, are not subject to U.S. taxes on repatriation.
10. WDMA supports the current tax deduction for advertising expenses and opposes efforts to reduce or eliminate it.
11. WDMA supports tax policy that incentivizes research and development (R&D) of sustainable window, door and skylight products that provide cost-effective, durable and energy-saving technologies. This includes strengthening the R&D federal tax credit by allowing for the immediate and full expensing of related expenditures.
12. WDMA supports and recommends strengthening the Work Opportunity Tax Credit (WOTC), which provides an incentive for labor-intensive industries to hire certain categories of individuals (e.g., veterans, below certain income limits, etc.).

# Product Supply

WDMA members rely on continued access to raw materials from domestic and imported sources necessary for manufacturing windows, doors, skylights, and architectural door products. Trade policies should allow for the legal importation of wood and must significantly contribute to reducing illegal logging. We support responsible forest management and natural resource policy that balance environmental stewardship of natural resources with the need to maintain stable and predictable access to raw materials to ensure our continued ability to manufacture fenestration products both domestically and abroad.

1. WDMA supports responsible forest management programs, such as the Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council (FSC) and others, that balance environmental stewardship with the need to maintain stable and predictable access to raw fiber and timber products needed for the manufacture of windows, doors, skylights and architectural door products.
2. WDMA supports efforts to increase the availability and use of certified wood products,

including SFI, FSC and others, through the US Green Building Council (USGBC)'s LEED, the National Green Building Standard (NGBS), Green Globes and other sustainable building programs.

3. WDMA supports natural resource and trade policy that ensures continued access to and sustainable use of raw materials, domestic and imported, necessary for manufacturing windows, doors, skylights and architectural door products.
4. WDMA supports legislation clarifying the regulatory guidelines and enforcement rules of the Lacey Act, bringing the declaration requirement in line with its intended purpose of prohibiting the trade of products made with illegally harvested wood while reducing excessive and unnecessary costs to the regulated community.
5. WDMA opposes regulatory efforts that unreasonably impact or restrict access to product components, materials and technologies that are necessary to manufacture and deliver high-quality energy-efficient products for residential and commercial markets.



# Trade



Trade policy that ensures the exchange of goods remains open and fair is critical to a robust domestic manufacturing sector. WDMA member companies support policies that allow manufacturers of all sizes to compete globally and create more business and economic opportunity. In addition, many high-paying manufacturing jobs depend on exports to other countries. Domestic trade policy must allow manufacturers to access global markets, in addition to facilitating high paying quality jobs for America's workforce.

1. WDMA supports trade policies that open markets and level the playing field globally for American manufacturers.
2. WDMA supports the elimination of border barriers that hinder market access, including tariffs and non-tariff barriers, to allow for the improvement of U.S. competitiveness in North America and globally.
3. WDMA believes the federal government should consider the full impact that tariffs justified by Section 301 of the Trade Act of 1974 and Section 232 of the Trade Expansion Act of 1962 have on window, door and skylight manufacturing and the economy as a whole.
4. WDMA supports trade measures that facilitate robust commercial relationships with Canada and Mexico, regional allies that have enabled U.S. manufacturing to be more competitive globally as a result of strong ties and cooperation.
5. WDMA supports modifications to existing trade agreements that alleviate or eliminate provisions that are unfair or disadvantageous to U.S. interests.
6. WDMA supports dispute resolution mechanisms that are balanced, expedient, and transparent to ensure trade remains fair and subjects manufacturers to the least burdensome requirements.
7. WDMA supports efforts by the federal government to immediately enter negotiations to enact a new Softwood Lumber Agreement between the United States and Canada that it believes reasonably ensures a supplemental supply of lumber is accessible to domestic consumers.

# Workforce/Workplace

Human resource policy that governs our nation's workforce must balance the rights of workers and employers, and not unfairly restrict the ability of manufacturers to offer to negotiate freely with their employees. The health and safety of employees is the foremost concern, but when developing new regulations in this area, the overall impact and costs of compliance must also be considered.

1. WDMA supports the preservation of secret ballot elections as the fairest way to guarantee the rights of employees to freely choose whether or not to be represented by a union and supports the ability of employers and employees to negotiate freely, without departing from existing timelines for elections that are well-known and accepted.
2. WDMA opposes legislation that would remove workers' rights to secret ballot elections to determine union representation and any other such effort, which would institute binding mandatory arbitration, or otherwise restrict the ability of employers and employees to negotiate mutually beneficial employment terms.
3. WDMA opposes other proposals that attempt to confer a tactical advantage on organizers and that deprive the employer and its employees of the time and opportunity to get all the facts before an election is held.
4. WDMA opposes efforts to expand the instances where third party advice used by employers to inform employees about their rights to collectively bargain, would have to be disclosed.
5. WDMA supports robust programs for protecting the health and safety of workers, including safety and training requirements that are justified, provide a demonstrable safety benefit and that do not add undue cost or administrative burden to comply.
6. WDMA supports legislation guaranteeing an employer's ability to participate in a fair union election and ensuring employees are able to make fully informed decisions about joining a union. Additionally, WDMA opposes



regulatory efforts to reduce the amount of time employers have to communicate with their employees between the time they learn that a union is trying to organize the workforce and the election.

7. WDMA supports government policies addressing the shortage of qualified candidates for high-skilled jobs by improving the STEM (Science, Technology, Engineering and Mathematics) education system approach and other efforts to increase the pool of qualified candidates for jobs in manufacturing.
8. WDMA supports legislation to ensure employers are protected from unwarranted lawsuits when making good-faith efforts to follow applicable public health guidelines during health emergencies.

# Immigration Reform



America's manufacturers are constrained by inadequate immigration policies that are failing to address a shrinking domestic workforce and industry-wide labor shortages. Our national immigration policy should ensure an abundant workforce that keeps U.S. manufacturers competitive with the rest of the world and allows businesses to meet market demand. America needs updated immigration policies that restores population growth and adds new consumers to the U.S. economy. WDMA supports a balanced approach to immigration reform that strengthens border security while also promoting economic growth by providing access to a competitive workforce that reflects the labor needs of domestic manufacturers.

1. WDMA supports a border security policy that funds infrastructure improvements and promotes the advancement of new border patrol technologies, while increasing

resources for border patrol officials and federal immigration courts to prevent illegal border crossings and address legal immigration backlogs. Without secure borders, no policy can succeed.

2. WDMA supports the creation of a federal electronic employment verification system that ensures undocumented workers do not displace American workers and provides employers' confidence in hiring workers.
3. WDMA supports policy reforms that prioritize America's workforce needs by increasing employment-based immigration to meet the labor demands of American manufacturers and businesses. Additionally, WDMA supports increased federal oversight and enforcement of employers that are dependent on worker visas so that American workers are not displaced or disadvantaged.
4. WDMA supports immigration policies that eliminate barriers on retaining the most-qualified applicants to enable the U.S. to retain its competitive edge. Additionally, WDMA supports removing per-country limits for employment-based immigrants in the science, technology, engineering and math fields.
5. WDMA supports expanding worker visa categories to allow employers to hire lesser-skilled employees for in-demand jobs. Additionally, WDMA supports policies that ensure pay is fair across sectors and industries so that American workers are not competing against underpaid labor.
6. WDMA supports simplifying the worker visa application process for employers with proven records of compliance to reduce processing times and paperwork burdens on employers, employees and the government.
7. WDMA supports establishing work authorization and a transitional pathway for citizenship for undocumented individuals who were previously brought to the United States as children. Additionally, WDMA believes that this eligibility should not apply to future arrivals.

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# About WDMA

Founded in 1927, the Window & Door Manufacturers Association (WDMA) is the premier trade association representing the leading manufacturers of residential and commercial window, door and skylight products for the domestic and export markets. WDMA members are focused on Total Product Performance™ products that are designed and built to performance-based standards. Member companies manufacture and supply sashes, frames, window units, skylights, flush doors, stile and rail doors, and sliding patio door units for residential, commercial and institutional markets, selling to distributors, dealers, builders, remodelers, architects, contractors and other specifiers. WDMA's member manufacturers are leading America's efforts to develop and utilize energy-efficient windows, doors and skylights for both new and replacement construction.

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