

The WSATC Electrical Subcommittee Report – April 2024

The Subcommittee met once since the January 2024 WSATC meeting to provide the Council with requested input on two matters.

1. Electrical Minimum Guideline Standard – 01 General Electrician Work Processes:
The subcommittee discussed the COMMERCIAL scope of work revising the language to more accurately describe the commercial scope of work that Training Agents are likely to encounter. They agreed to make a request of the WSATC to direct the Department to revise all Minimum Guideline Standards to reflect the following changes to the Work Process language.

Electrical Minimum Guideline Standard – 01 General Electrician Work Processes

<i>A. General Electrician (01)</i>	<i>Approximate Hours/Competency Level</i>
<i>1. COMMERCIAL-wiring of public commercial, Installations including <u>all phases and all types of electrical installations as referenced in WAC 296-46b,</u> and repair of all equipment therein; and necessary pre-fabrication and preparation</i>	
<i>INDUSTRIAL-wiring of all industrial buildings and equipment; the maintenance, repair, and alteration of the same; and necessary pre-fabrication and preparation</i>	<i>*No less than 4000 Hours*</i>
<i>2. RESIDENTIAL-wiring of residences, duplexes, and small apartment buildings and necessary pre-fabrication and preparation</i>	<i>*No more than 4000 Hours*</i>
<i>SPECIALIZED SYSTEMS-wiring of systems which include; sound, data transmission, telephone, fire alarm, fiber optics, energy management, closed circuit television programmable controllers, and nurse call systems</i>	
<i>Total Hours/#of Competency Levels: 8000</i>	

2. The impact of the variance stipulations outlined concerning trainees with 3,000 hours worked and their ability to work on the same jobsites as registered apprentices:
The subcommittee discussed the stipulations. The key points in favor of allowing the variance without the added stipulations were keeping with the spirit of the approved legislation; and, it provides new programs and training agents an easier transition into apprenticeship. The key points for allowing the variance with the added stipulations were protecting the interest of the apprentices; and, it would undermine the purpose and intent of apprenticeship as we know it in the state of Washington.
Generally, programs were either in favor of removing the added stipulations or were neutral (did not comment) on the matter, while one program spoke in favor of leaving the added stipulations.
Since there were several programs and representatives in attendance with different views, it was decided to ask that programs provide written feedback for the Council's consideration.

While the last Electrical Subcommittee Meeting had solid, respectful participation by many representatives of proposed and existing programs, for this body to continue functioning as a useful tool that provides the Council with meaningful input and direction, the subcommittee will need direction regarding who can participate and how conclusions will be reached.

Respectfully submitted by:

Rob Bartel, Chairman and Mike Yusi, Vice Chair, Electrical Standards Subcommittee



March 27, 2024

Washington State Apprenticeship Training Council
Washington State Department of Labor & Industries
Apprenticeship Section
PO Box 44530
Olympia, WA 98504-4530
Apprentice@Lni.wa.gov

Dear Washington State Apprenticeship Training Council,

I am writing on behalf of the Performance Electrical Apprenticeship Committee to express our views on the impact of the variance stipulations outlined concerning trainees with 3,000 hours worked and their ability to work on the same jobsites as registered apprentices. We would like to voice our support for a variance with no additional stipulations, allowing trainees and apprentices to work together on (01) scopes of work under supervision of a registered training agent during the exception period.

While we have already registered anyone working on (01) scopes, we are empathetic to the hardships other contractors and trainees face during the implementation of apprenticeship.

Based on our own experience transitioning to apprenticeship, we would have retained about 3 minority employees on a path to journey level if we had been able to offer them a trainee option. They had already completed a two-year electrical program and sought work elsewhere, where they were not required to become an apprentice. In another couple of situations, we've had tenured trainees/02 journey level workers who didn't meet the minimum requirements for apprenticeship (no high school graduation equivalence/low math grades), and we were unable to register them.

Allowing a variance without stipulations is in the spirit of the legislation and least impactful for smaller employers/programs who may be unable to comply with trainee/apprentice ratios due to team size.

We believe that by allowing trainees and apprentices to work together, we can provide more options and paths to success that overcome training bottlenecks. This ultimately benefits the entire industry. We kindly request that the Washington State Apprenticeship Training Council considers this perspective when evaluating the impact of the current variance stipulations.

Thank you for your attention to this matter.

Sincerely,

Amy Simondet

Training Director, Performance Electrical Apprenticeship Committee



Southwest Washington Electrical JATC

3001 S 36th St, Suite A • Tacoma, Washington 98409
Phone: (253) 475-2922 Fax: (253) 474-7945
www.swjatc.org

Barry Blackburn, Training Director

April 4th, 2024

Dear Washington State Apprenticeship Training Council Electrical Subcommittee:

As the Training Director of the Southwest Washington Electrical JATC (SWJATC), I am writing on behalf of a joint committee that strives to provide the best training possible for all of their registered apprentices. With that in mind, we find ourselves agreeable to the removal of the added stipulations that the WSATC put in place for the variance to allow for the mixing of apprentices and trainees. We do this since it is unlikely that many of our Training Agents will utilize the variance. Furthermore, to protect our apprentices, we have the capacity to oversee all of our Training Agents that do utilize the variance.

It is important to both support, and provide caution, in regards to the decision to agree with removing the added stipulations to a temporary variance allowing apprentices and trainees working for the same training agent.

To caution, employing both trainees and apprentices will likely cause a variety of issues for training agents, which may be somewhat limited by the additional stipulations. Examples of potential conflict may include unfair employment actions for both the trainee and apprentice, as well as vagueness in compliance regulation for a period of time. Also, the variance is a transitional tool that if not closely monitored may allow programs to undermine the purpose and intent of apprenticeship. These reasons are not to shadow our support of the variance without stipulations; however, these circumstances provide reason to encourage Labor and Industries to provide strict vigilance of programs that utilize the variance and to keep a strict adherence to a variance deadline of June 30, 2026.

In support, the temporary variance without the added stipulations promotes the greater good of supporting the Apprenticeship Only Law, ESSB 5320, as well as the associated expansion of apprenticeship. In addition, we understand that additional stipulations may negatively impact newer and/or smaller programs and employers as the workforce transitions into apprenticeships. These considerations provide foundational reasoning for our position to agree to the temporary variance without the added stipulations. The variance would meet the intent of the legislation, as well as assist existing employers as they become new training agents.

If you have any questions about this subject, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Blackburn". The signature is fluid and cursive, with the first name "Barry" and last name "Blackburn" clearly distinguishable.

Barry Blackburn
Training Director
barry@swjatc.org

April 2, 2024

Rob Bartel
Chair of the WSATC Electrical Subcommittee
Department of Labor & Industries Apprenticeship Section
PO Box 44530
Olympia, WA 98504

Dear Mr. Bartel,

We are writing on behalf of EEAA to express our opposition to the inclusion of stipulations in the variance that allows for concurrent employment of registered apprentices and trainees in the 01 electrical scope.

The memo released by the Apprenticeship Section at Labor and Industries on October 30th, 2023, highlights stipulations mandating the prioritized layoff of trainees over apprentices during work shortages and enforcing a 2:2:1 ratio of journey-level workers to apprentices to trainees. These stipulations have elicited considerable concern within our program and to those exempt trainees employed by Express Electric.

The stipulation prioritizing trainee layoffs during work shortages poses significant challenges for businesses and employers, inevitably impacting workers. It may force employers to terminate experienced and long tenured trainees nearing their required certification hours and retain the less experienced apprentices. This decision contradicts our efforts to foster a highly skilled workforce and could be damaging to long-term employees. Moreover, this provision deters small and medium-sized businesses from hiring apprentices, as they may hesitate to dismiss long-term staff during downturns. Such businesses comprise most of our state's workforce, and their engagement is vital to the long-term success of the 01 Apprenticeship program.

The rigid 2:2:1 ratio does not consider the varied needs of businesses, particularly small to mid-sized companies. This inflexibility could push employers to hire additional apprentices or release highly skilled trainees, regardless of their company's capacity or resources. This strategy neglects the practical hurdles faced by businesses and may inadvertently jeopardize the job security of trainees exempt under ESSB 5320.

Furthermore, requiring two apprentices before hiring a trainee disregards the specific workforce needs of small firms that may only need a single apprentice for their current projects. Moreover, enforcing the 2:2:1 ratio may force single business sponsors to enroll long-tenured trainees exempt under SB5320, despite their potential lack of interest in joining an apprenticeship program. This situation could lead to the dissolution of long-lasting employee/employer relationships, as some exempt employees may choose to seek employment elsewhere rather than enroll in an apprenticeship program leading to unnecessary employee turnover and a loss of valuable expertise within companies.

In light of these above concerns, we feel that the stipulations added to the variance, which was intended to allow concurrent employment of apprentices and exempt trainees, are now hindering the effectiveness of the original temporary exemption under SB5320. This exemption, as approved by the legislature after extensive testimony and negotiations, should not be undermined by these additional stipulations. Therefore, EEAA respectfully requests the removal of these stipulations to ensure that the variance aligns with the original intent of SB5320 and supports the broader objectives of the 01 Apprenticeship program.

Thank you for your consideration in addressing these concerns.

Hale Hardt
Employer Representative, EEAA (Express Electric Apprenticeship Academy)
Express Electric INC.
1354 Pacific Place Unit 101
Ferndale, WA 98248
halehardt@expresselectric.com



Greg Fransen
Training Director, EEAA (Express Electric Apprenticeship Academy)
Express Electric INC.
1354 Pacific Place Unit 101
Ferndale, WA 98248
Greg@expresselectric.com



From: [Martin, Patrick M \(LNI\)](#)
To: [Rob Bartel](#); [Mike Yusi](#)
Cc: [Guzman, Peter \(LNI\)](#); [LNI RE Apprentice](#)
Subject: FW: Variance
Date: Wednesday, April 3, 2024 11:55:53 AM

Gentlemen –

Please see Halene’s comments below in response to the Electrical SC’s request for comments on the variance stipulations.

Patrick Martin
Apprenticeship Technical Specialist
Washington State Department of Labor & Industries
360.485.3313
Patrick.Martin@lni.wa.gov

From: Halene Sigmund <halene@citcwa.com>
Sent: Wednesday, April 3, 2024 11:52 AM
To: Martin, Patrick M (LNI) <MAPC235@LNI.WA.GOV>
Subject: Variance

External Email

Hello Patrick:

CITC is opposed to removing the guardrails that the WSATC put in place for the variance to allow for the mixing of apprentices and trainees. These guardrails protect the interest of the apprentices and, as a sponsor of apprenticeship programs, it is our steadfast belief that our first obligation is to the apprentices in our programs. Should a program wish to implement the variance, removing these guardrails would undermine the purpose and intent of apprenticeship as we know it in the state of Washington.

Thank you,

Halene

Halene Sigmund, President

Construction Industry Training Council of Washington

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From: [Martin, Patrick M \(LNI\)](#)
To: [LNI RE Apprentice](#)
Subject: FW: NWEJATC letter to the WSATC ESC
Date: Tuesday, April 9, 2024 2:31:21 PM

Patrick Martin
Apprenticeship Technical Specialist
Washington State Department of Labor & Industries
360.485.3313
Patrick.Martin@lni.wa.gov

From: Rob Bartel <rob.bartel@nwejatc.org>
Sent: Wednesday, April 3, 2024 5:40 PM
To: Martin, Patrick M (LNI) <MAPC235@LNI.WA.GOV>; Mike Yusi <mike@titan-electrical.com>
Cc: Rob Bartel <rob.bartel@nwejatc.org>
Subject: NWEJATC letter to the WSATC ESC

External Email

Dear Washington State Apprenticeship Training Council Electrical Subcommittee:

As the Training Director of the Northwest Washington Electrical Industry JATC (NWEJATC), I am writing on behalf of a joint committee that strives to provide the best training possible for all of their registered apprentices. With that in mind, we find ourselves agreeable to the removal of the added stipulations that the WSATC put in place for the variance to allow for the mixing of apprentices and trainees. We do this since it is unlikely that many of our Training Agents will utilize the variance. Furthermore, to protect our apprentices, we have the capacity to oversee all of our Training Agents that do utilize the variance.

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In support, the temporary variance without the added stipulations promotes the greater good of

supporting the Apprenticeship Only Law, ESSB 5320, as well as the associated expansion of apprenticeship. In addition, we understand that additional stipulations may negatively impact newer and/or smaller programs and employers as the workforce transitions into apprenticeships. These considerations provide foundational reasoning for our position to agree to the temporary variance without the added stipulations. The variance would meet the intent of the legislation, as well as assist existing employers as they become new training agents.

Thank you,

Rob

Robert Bartel, Training Director

he/him/his

Northwest Washington Electrical Industry J.A.T.C.

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