

CONCISE EXPLANATORY STATEMENT

WAC 296-46B-945, Qualifying for master, journey level, specialty electrician examinations.

Public Hearing: January 4, 2023

Adoption: February 14, 2023

Effective: July 1, 2023

Table of Contents

I. Purpose of Rulemaking.....	2
A. Background	2
B. Summary of the rulemaking activities	3
II. Changes to the Rules.....	4
III. Comments on proposed rule.....	4
A. Comment Period	4
B. Public Hearing.....	4
C. Summary of Comments Received and Department Response.....	4

I. Purpose of Rulemaking

This rulemaking expands the qualifications for journey level electrician examinations under WAC [296-46B-945](#). Rules are required to implement [Substitute Senate Bill 6126 \(SSB 6126\), Chapter 249, Laws of 2018](#).

SSB 6126 enacted apprenticeship requirements for journey level (01) electrician examination candidates. The requirements take effect July 1, 2023. SSB 6126 gives the Department of Labor & Industries (L&I) the authority, until July 1, 2025, to allow applicants to take the examination, if there is “good cause” for not completing the minimum hours of work under standards applicable on July 1, 2023 (RCW [19.28.195](#)). The rule affects applicants who have obtained experience and training equivalent to a journey level registered apprenticeship program.

The adopted rule identifies alternative pathways that are considered sufficient experience and training to qualify a candidate including, but not limited to:

- Other existing paths toward journey level exam qualification in addition to apprenticeship completion. These include:
 - State-licensed electricians from other jurisdictions that require 8,000 hours of experience (4,000 hours must be new commercial or industrial installations) to qualify for the 01 journey level electrician examination;
 - Individuals with electrical experience gained in a construction battalion while serving in the armed forces of the United States to qualify for the 01 journey level electrician examination;
 - Individuals from other jurisdictions that have 16,000 hours working in the electrical construction trade (4,000 hours must be commercial or industrial installations) to qualify for the 01 journey level electrician examination; and
 - Individuals with 4,000 hours performing industrial or commercial installations accrued prior to July 1, 2023. The individual can continue accruing remaining specialty experience and qualify for the journey level electrician examination without joining an apprenticeship program.
- An option for registered apprentices who have completed the work experience and training requirements of an apprenticeship program to address the period between completion and passage of the exam.

The adopted rule also includes how L&I will approve qualified hours gained by applicants for the journey level examination under the good cause exemptions, along with housekeeping changes.

A. Background

In 2018, the legislature passed SSB 6126, requiring completion of a registered apprenticeship program approved under chapter 49.04 RCW or equivalent program to qualify for a journey level electrician (EL01) examination and certificate of competency. The passage of SSB 6126, effective July 1, 2023, amends the path to certification to an apprenticeship-only model for journey level electricians, removing all other paths. To perform work limited to journey level electricians after July 1, 2023, trainees have to be registered apprentices.

From July 1, 2023, until July 1, 2025, SSB 6126 provides a “good cause” provision under RCW 19.28.195, that authorizes the department to qualify applicants for journey level examinations that have “good cause” for not completing registered apprenticeships.

In 2019, the agency adopted rules to implement registered apprenticeship completion requirements introduced by SSB 6126 (WSR 19-15-117), but no rules were included for a “good cause” exception.

B. Summary of the rulemaking activities

The rule development process included an opportunity for review and recommendations from stakeholders and interested parties, the Electrical Apprenticeship Subcommittee, the Electrical Board, and through the public hearing process.

A CR-101 Preproposal Statement of Inquiry (WSR 22-16-088) was filed on August 2, 2022.

A CR-102 proposed rulemaking was filed on November 22, 2022, under WSR 22-23-153. A public hearing was held on January 4, 2023.

L&I established an Electrical Apprenticeship subcommittee early in 2022. The committee is made up of open shop and union employers who provide advice, input and opinions regarding SSB 6126. Regular meetings were held throughout the rulemaking process.

L&I seeks the advice of the Electrical Board for all rule changes, which consists of multiple representatives in the industry. The board meets quarterly each year. The department shared the draft proposed rule with the board at the Oct. 27, 2022, meeting. The board did not provide any feedback for changes and was supportive of the draft as written. The proposed rule was shared with the board at its Jan. 26, 2023, meeting for additional advice prior to adoption.

The Electrical Program is coordinating with the Fraud Prevention and Labor Standards (FPLS) Apprenticeship Program on rulemaking. A report was shared with the Washington State Apprenticeship Training Council (WSATC) at their quarterly meeting in October 2022. The report provided a high-level outline of the draft changes under consideration. Committee members did not provide any feedback.

The WSATC Electrical Subcommittee was given a rulemaking update at their meeting on Dec. 7, 2022. This group also includes representatives of registered apprenticeship programs.

II. Changes to the Rules

There are no differences between the text of the proposed rule and rule as adopted.

III. Comments on proposed rule

The purpose of this section is to respond to the oral and written comments received through the public comment period and at the public hearing.

A. Comment Period

The public comment period for this rulemaking began November 22, 2022, and ended January 4, 2023. The department received eleven (11) written comments.

B. Public Hearing

A public hearing was held on January 4, 2023, at 9:00 a.m. The public hearing was a “hybrid” event. About fifty (50) persons attended the public hearing. Twenty-three (23) persons provided testimony.

C. Summary of Comments Received and Department Response

Below is a summary of the comments the department received and the department’s response.

General Comments	Department Response
Comment #1	Response #1

<p>I'm currently scared from this new law taking place. I have my 02 card, so 4000 hours recognized through the state. And now I have close to 2000 hours as an 01 apprentice, all in all by July 2023 I'll have close to 7000 hours total. Are you guys really going to not recognize all my hours, and disqualify me from continuing my training without a program, even though I'm barely a Thousand short?</p> <p>I don't think that's right, and I would be effected greatly by this. As I have a family and we depend on my current job and wage I'm making.</p> <p>Is there anything I can do, Anyone I can talk to? I just wanted to reach out, voice my opinion to someone who hopefully will hear it. Thank you so much.</p>	<p>Thank you for your comments. The good cause allowance in RCW 19.28.195 was enacted into law as part of 2018's Substitute Senate Bill 6126. The adopted amendments to the rule made under authority provided by RCW 19.28.195 provides exceptions to apprenticeship completion for those that have 8,000 hours of experience, 4,000 of which are industrial/commercial hours.</p> <p>If you are a trainee doing work limited to 01 electricians after July 1, 2023, the laws passed in 2018 requires you to be registered in an apprenticeship program. There is not a way to gain more 01 hours without doing so.</p> <p>If you are a 4,000 hour specialty electrician, the laws passed in 2018 require apprenticeship programs to credit you with 4,000 hours towards completion of their programs. Programs may recognize all or part of your 01 hours.</p> <p>Learn more about requirements and available apprenticeship programs at: www.lni.wa.gov/ElectricalApprenticeship</p> <p>We understand your concerns. The purpose of the adopted rule is to provide more paths for applicants who have not completed an apprenticeship to allow them to qualify for examination while we make this transition.</p>
<p>Comment #2</p>	<p>Response #2</p>
<p>Couple questions. Once again why does it matter if the apprentices get their specialty hours 4000 before they get the 01 4000 hours seems like L&I is discriminating against them it shouldn't make any difference both are required 4000 specialty 4000 commercial or industrial ?</p> <p>What if apprentice has 2000 specialty hours from military and 3000 hours by July 1, 2023, so he has 5000 total hours why would they have to enroll in</p>	<p>Thank you for your comments. The rule under consideration implements the temporary good cause provision of RCW 19.28.195.</p> <p>The good cause allowance in RCW 19.28.195 (effective July 1, 2023) allows L&I to provide exceptions to apprenticeship completion requirements. All exam applicants must have 8,000 hours of experience, 4,000 of which are industrial/commercial hours. The adopted rules provide trainees having 4,000 industrial/commercial hours worked before July 1, 2023, an additional two (2) years to complete 4,000 hours of specialty work. Once they have 8,000 hours, they can qualify for exam if L&I receives their exam application before July 1, 2025.</p>

<p>school but if they have 4000 01 hours they don't ?</p> <p>What about apprentices that have 8000 hours now or by July 1, 2023, but haven't passed journeyman's test do they have to get a special card, just keep same card and do they get to work just as they do now?</p> <p>What about a 02 journey card holder can they keep their 02 card, supervise two trainees as they do now and enroll in 01 apprenticeship program and switch back and forth as needed if they attending 01 classes ?</p> <p>L&I said this law 6126 was industry driven it was never industry driven and it isn't well thought out now only people that has any input is L&I CITC and IBEW how is that fair when approximately 1500 nonunion shops are not included or represented?</p> <p>Why doesn't this rule allow for an online version of an apprenticeship? People can earn college degrees online in every field, but our state won't allow them to study and learn about electricity online? They are already working in their trade 2000 hours a year why would they need to be in a classroom?</p> <p>The new rule changes should call out a few different online options for an apprenticeship education that can be signed up for and taken by</p>	<p>The good cause allowance in RCW 19.28.195 (effective July 1, 2023) only applies to qualifying for exam, it does not affect requirements for apprenticeship registration for trainees doing work limited to 01 electricians after July 1, 2023. Starting on July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Beginning on July 1, 2023, trainees who have been approved for the 01 exam must work in specialties unless they are a registered in a 01 apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department.</p> <p>Nothing stops a 02 specialty electrician who becomes registered apprentice in 01 apprenticeship program from keeping their 02 certificate. To work as a 02 specialty electrician and supervise trainees, they can request a voluntarily suspension from their 01 apprenticeship program as outlined in the electrical minimum guideline standards on Page 14. A Voluntary Suspension of the Apprenticeship agreement must be approved by the program in order to work outside the apprenticeship agreement. However, working as a specialty electrician does not get the apprentice closer to the 4,000 hours of industrial/commercial experience they need to complete their apprenticeship and qualify for the 01 exam.</p> <p>L&I has no authority to repeal a law enacted by the legislature. The legislature enacted Substitute Senate Bill 6126 (SSB 6126) during the 2018 session. Hearings were held in the both the Senate and House of Representatives. There were opportunities to provide testimony during each hearing. More information about how this bill became law: https://app.leg.wa.gov/billsummary?BillNumber=6126&Year=2017&Initiative=false</p>
---	--

the apprentice rather than in classroom time. I know for a fact that Mike holt has online curriculum that can be done for an apprenticeship program why isn't this being considered? Online Degrees Bachelors, Associate, Masters Business, Criminal Justice Legal, Education, Fine Arts and Design, Liberal Arts and Humanities, Math, Science and Engineering Public Affairs and Social Sciences, Technology.

This law should be repealed. The ramifications of this law were not thought through and this state does not have the infrastructure setup to allow for this to be successful. When this law was written did anyone think about any of the specialty electricians? This will basically guarantee that they have no way to advance from their specialty to the 01 level. Once they become an apprentice, they will not be able to work by themselves in whatever specialty license they have already attained, and employers will not be able to lose those employees production.

The new L&I proposed changes to the law are almost the same as 5599 that didn't pass last year it should be fixed or repealed hopefully it won't pass

Rules are not clear and discriminate against specialty apprentices anyone that has any hours should be grandfathered in once they started

L&I has no authority to change delivery methods for required apprenticeship education. SSB 6126 provided no authority to L&I to change apprenticeship laws (chapter 49.04 RCW) and rules (chapter 296.05 WAC) or apprenticeship policies put in place by the Washington State Apprenticeship Training Council (WSATC).

SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in 01 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they fulfill their program's educational requirements and amass 4,000 hours of industrial commercial experience.

Hours of experience accepted by L&I's electrical licensing section remain a part of a trainee's licensing record and can be considered by apprenticeship programs for advanced standing.

The adopted amendments to the rule are similar to allowances provided by 2022's Senate Bill 5599 that was considered by the legislature last session. If the proposed amendments to the rule were not adopted, completion of a chapter 49.04 RCW apprenticeship or equivalent apprenticeship would be the only way for applicants to qualify for the 01 general journey level examination.

down this career path.	
Comment #3	Response #3
<p>As an owner of a electrical contracting company that works in both Washington and Idaho I feel that we as an Industry must do as much as we can to attract, train, and retain electricians. As many of you well know there is a severe shortage of skilled workers, this will only continue as we move into the future. I would urge this group as well as other decision makers within Washington L & I to help minimize the restrictions that are making it difficult for prospective employees to enter the electrical field. We as a industry have to work together union and nonunion to provide a service to our customers. It will take all of us to meet the growing demands of a ever evolving state of Washington.</p>	<p>Thank you for your comments. Starting on July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>If you are not a training agent for or a sponsor of a program that is approved under chapter 49.04 RCW in Washington State, you may want to contact the Apprenticeship Section of L&I for more information about equivalency.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship</p> <p>We understand your concerns. The purpose of the adopted rule is to provide more paths for applicants who have not completed an apprenticeship to allow them to qualify for examination while we make this transition.</p>
Comment #4	Response #4
<p>Please regard this email as my testimony at the next hearing on Jan 4, 2023 for the proposed rule. Also, please respond to these questions so that I know this email was received:</p> <ol style="list-style-type: none"> Does my testimony count for anything, or is it even presented at the hearing? Is it accurate to interpret this “good cause” proposal as inconsiderate of anyone who has not completed 4000 commercial hours before July 1, 2023? <p>I changed my career from Spanish Translator to</p>	<p>Thank you for your comments.</p> <ol style="list-style-type: none"> The purpose of the public hearing is to receive oral comments on the proposed rule. We also accepted written comments until 5 p.m. on January 4. All written comments and testimony are included in the Concise Explanatory Statement (CES) document with the department’s formal responses. We greatly appreciate and desire stakeholder input at all stages of the rulemaking process including testimony at a public hearing. The law does not provide authority to L&I to enact a rule that would allow a trainee who is not a registered apprentice in a 01 apprenticeship program to continue to gain 01 experience hours after July 1, 2023.

Electrical Trainee in December of 2019 with the intention of earning an EL01 license as soon as I could. I immediately found my first electrical job before quickly moving to a commercial company that could help me reach my goal faster. The pandemic began a few months later, effectively ending my employment, and I could not find a commercial company that was in-business let alone hiring. Then, I was fortunate enough to find my current employer who provides both residential and commercial opportunities. I'm proud to say that I just passed my EL02 exam (98%!) thanks to the residential work sustaining us throughout the pandemic.

I've only recently been able to continue accruing some commercial hours as more businesses are re-opening and rebuilding. However, July 1, 2023 is fast-approaching and I'm concerned that there is no consideration of good cause for anyone who has not completed 4,000 commercial hours by 2023. I've been extremely diligent about fulfilling all of the requirements of an EL01 trainee, but the pandemic halted my ability to affidavit any significant commercial hours. Please keep in mind, that I was still earning some commercial hours throughout the pandemic, but my trainee hours were drastically stunted because of the lack of available commercial work during those 2+ years. Furthermore, I will be forced to quit my current job if the electrical board's rule-changing proposals do

However, the law does allow L&I to qualify applicants for the 01 exam who have not completed apprenticeships until July 1, 2025. Until that date the adopted rule allows someone who has 4,000 industrial/commercial hours to gain enough specialty hours to qualify for the exam without having to complete an apprenticeship.

The good cause allowance in RCW 19.28.195 allows L&I to provide exceptions to apprenticeship completion requirements per 2018's Substitute Senate Bill 6126 (SSB 6126), effective July 1, 2023. All exam applicants must have 8,000 hours of experience, 4,000 of which are industrial/commercial hours. The adopted rule provides trainees having 4,000 industrial/commercial hours worked before July 1, 2023, an additional two (2) years to complete 4,000 hours of specialty work. Once they have 8,000 hours, they can qualify for the exam if L&I receives their exam application before July 1, 2025.

Specialty electricians do not lose credit for their specialty experience. 2018's SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in 01 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they fulfill their program's educational requirements and amass 4,000 hours of industrial/commercial experience.

Hours accepted by L&I's electrical licensing section remain on record and can be considered by an apprenticeship program for advanced standing. Registered apprentices who have 4,000 hour specialty electrician certificates receive 4,000 specialty hours toward completion of their program.

The good cause allowance in RCW [19.28.195](#) (effective July 1, 2023) only applies to qualifying for exam, it does not affect requirements for apprenticeship registration for trainees doing work limited to 01 electricians after July 1, 2023.

<p>not include consideration for anyone who has not completed 4000 commercial hours by July 1, 2023.</p> <p>Good cause must account for trainees like myself because the pandemic also denied our ability to have equal and fair access to earning commercial hours. The electrical board or whomever is deciding to limit access to the EL01 licensing options must include trainees who've earned the 4000 residential hours as another exception included in the 2025 extension for good cause because those hours are still legally applicable to the 8000 total required for EL01. Or, please consider allowing trainees who've passed EL02 before July 1, 2023 to still be capable of earning their remaining commercial hours by the newly proposed July 1, 2025 date.</p> <p>It is unjust and illegal to create this grace period for good cause if it does not apply to everyone that the original rules previously applied to. In other words, trainees were legally certified with the stipulation that the prerequisites for EL01 licensing were proposed to change on July 1, 2023. Therefore, any extension of the rule change shall apply to everyone the same, especially when considering the widespread nature of the pandemic! By removing trainees who've continued to affidavit commercial and residential hours during this unprecedented time, you will continue to reduce the supply of electricians contributing to</p>	<p>Starting on July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to O1 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>If you are a trainee doing work limited to O1 electricians after July 1, 2023, the law passed in 2018 (RCW 19.28.161(2)(a)(i), effective July 1, 2023) requires you to be registered in an apprenticeship program. There is not a way to gain more O1 hours without doing so. L&I has no authority to modify this law.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship</p>
--	--

<p>a nationwide shortage. Demand for our trade has greatly increase meanwhile more electricians are quitting/retiring than those that are getting licensed. So, I am requesting that whomever is creating these protectionist policies to please extend this “good cause” exemption to include all trainees, not just those that have earned 4000 commercial hours by July 1, 2023.</p>	
<p>Comment #5</p>	<p>Response #5</p>
<p>I have a comments and proposals and questions for hearing on January 4, 2023.</p> <p>First of all it is about residential electrical licensing. I have next questions:</p> <ol style="list-style-type: none"> 1. Residential Certificate 02 For people who adopt the new rules for the Board and Chief electrical inspector. How many hours of training do I need to have to replace a light bulb or an outlet at my home? How much would it cost me to hire an electrician to do that job? Are you sure these requirements for electricians can make it affordable to average households in Washington State? 2. Residential maintenance Certificate 07B 2000 hours of experience. What can a person do under that certificate? 3. Can you describe briefly what the difference between those 2 Certificates is? 	<p>Thank you for your comments.</p> <ol style="list-style-type: none"> 1. The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination. Existing laws in RCW 19.28.261(5) allow property owners to perform electrical work on their own property. They are exempt from certification requirements, meaning they do not have to have any training or experience to work on their own property. This allowance has been in law since at least 1919. L&I does not regulate pricing for work performed by electrical contractors. <p>Nothing in the adopted amendments to the rule affects residential specialty electricians who work on houses, and the adopted rule only pertains to candidates qualifying for the 01 general journey level examination.</p> <ol style="list-style-type: none"> 2. An 07B specialty electrician can repair and replace electrical equipment as described in WAC 296-46B-920(2)(i). 3. Four thousand (4,000) hours of supervised experience is required to qualify for the 02 residential specialty election examination. <p>Candidates for the 07B exam have to work under 100% supervision for 720 hours to qualify for examination. When they pass, they can work by themselves</p>

<p>4. How many hours a person needs to be trained to have a couple certificates, can you reuse hours from one certificate to another?</p> <p>5. Do you know how many companies right now can hire a trainee for residential certificate or Residential maintenance certificate according to new regulations?</p> <p>6. Do these new regulations not lobbying Large electrical Corporations to make them a monopoly in Industry?</p> <p>7. How easy a regular citizen can get into the electrical business with new requirements?</p> <p>In my opinion people should receive affordable electrical services.</p> <p>People who want to be electricians should receive trainee experience and can be hired in every county without any issues with benefits and with minimum wage not smaller than average paycheck in the company where they work. Should be easy access to electrical schools and free classes in every County. Otherwise, all regulations that we adopt do not work for people from both sides. Also, the department should stimulate people with free electrical classes and opening new jobs for trainees. And stop creating monopolies. I am open</p>	<p>without any supervision. Once they have worked 2,000 hours they are eligible to apply for certification.</p> <p>The biggest difference is that an O2 can install, repair, and replace all wiring and equipment as allowed in their scope in WAC 296-46B-920(2)(a). 07B specialty electricians can only repair and replace electrical equipment as described in WAC 296-46B-920(2)(i).</p> <p>4. It depends on the type of specialty certificate. Everything about qualifying for a certification examination is found in WAC 296-46B-945.</p> <p>Experience gained in one specialty cannot be counted toward experience in another. Up to 4,000 hours of specialty experience counts toward the 8,000 hours required to qualify for the 01 general journey level examination. Two thousand (2,000) hour specialty hours do not count toward qualifying for other exams because very little of the experience is gained while working under supervision and the scopes of work are very narrow.</p> <p>5. New regulations only affect candidates for 01 general journey level examinations. They have no effect on anyone with an O2 or 07B certificate.</p> <p>6. The new regulations do not provide a monopoly for large electrical businesses.</p> <p>7. New regulations affect the type of training required to be 01 general journey level electrician. The regulations have no effect on specialty electricians. Industry sets the demand for workers. Sometimes demand is high, other times finding work is difficult because demand is low.</p> <p>New regulations do not prevent anyone from obtaining a training certificate and going to work as a specialty electrician. Once they have one, they need to find an employer that employs certified electricians to supervise them while</p>
---	--

<p>for public discussions and proposals from the Department. You can reply me back to this email for more information and if you have any questions.</p>	<p>they learn. Employers that work on the property of others have to be licensed electrical contractors.</p> <p>If somebody wants to become a 01 general journey level electrician, new regulations now make things more formal. In addition to obtaining training certificates, trainees need to become registered apprentices. Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>L&I has no authority or funding to provide free education or employment for trainees.</p>
<p>Comment #6</p> <p>I'm a general contractor in WA state, owner of Vlad's Remodeling LLC.</p> <p>4000 hours, which is a little bit over 2 years, is a ridiculous amount of time just to learn residential wiring. This is one of many reasons a lot of illegal work is done across the country. Since United States is the melting pot of the world, we have many bright people, coming from different backgrounds. Thousands come to the US with abundance of electrical knowledge. Physics don't vary from country to country, laws and regulations do.</p> <p>I propose allowing any individual to be allowed to take the EL02 exam and become an electrician. This way there will be more licensed professionals, more permits pulled, more jobs to be inspected, and more revenue to be made. Homeowners also</p>	<p>Response #6</p> <p>Thank you for sharing your observations.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements temporary exceptions to apprenticeship completion for candidates seeking to qualify for the 01 general journey level examination.</p> <p>L&I has no authority to make a rule to waive the 4,000 hour experience requirement for residential specialty electricians required by law, See RCW 19.28.191(1)(g)(i) (effective until July 1, 2023), or RCW 19.28.191(1)(d)(i) (effective July 1, 2023).</p>

<p>would benefit tremendously: there would be less chances of electrical work done improperly. In my humble opinion, I believe my proposition will save lives, create more jobs, and increase WA state's revenue. It's a win-win situation.</p>	
<p>Comment #7</p>	<p>Response #7</p>
<p>Please accept my letter as public testimony requesting a delay to the July 1, 2023 implementation date and to expand the good cause exemption to all hours currently accrued from Washington State Trainees and specialty license holders. To only accept commercial or industrial hours is discriminatory to all other electrical hours and creates an enormous obstacle for those that had plans to use these hours to work towards an 01 certification.</p> <p>This department created the current pathway to obtain an 01 certificate which requires the purchase of an electrical trainee card, continuing education hours, and to submit notarized affidavits of experience. The affidavit verifies the appropriate amount of supervised hours for their time working in the electrical trade until enough residential and commercial/industrial hours have been accrued for the exam. All hours of current trainees and specialty licensed holders should be accepted without prejudice.</p> <p>To change this pathway to 20,000 plus trainees, and specialty license holders, already in route to an</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements temporary exceptions to apprenticeship completion for candidates seeking to qualify for the 01 general journey level examination. L&I has no other authority to delay or repeal other sections of the electrical laws affected by SSB 6126.</p> <p>Starting on July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023. Beginning on this date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>The purpose of the adopted rule is to provide more paths for applicants who have not completed an apprenticeship to allow them to qualify for examination while we make this transition.</p>

<p>01 seems criminal but hopefully just a huge oversight from LNI and those involved in creating this exemption. To move forward with this rule-making proposal in its current form will ruin lives and prosperity of “would have been” 01 Journeyman. It will create a mass exodus from the electrical trade. It will also alter the course of our desperately needed electrical contractors and force decisions on what type of jobs they need to prioritize and which jobs will not benefit their employees for all their years of lost hours. This will ultimately hurt the Washington State economy and its consumers. Limiting opportunities to become an 01 electrician is not an acceptable means of regulation, especially in our current crisis of workforce shortages across the trades. I urge you to delay these proposed rules and allow for the electrical industry as a whole to be a part of making amendments to the current language.</p>	
<p>Comment #8</p>	<p>Response #8</p>
<p>Thanks for running the public hearing on the proposed rules to implement SSB 6126. I think that most of us on the small contractor side of this agree that this law, as written, along with the proposed rules by L&I, is not only unfair to small businesses but also to the individuals that have already started their path towards becoming a Journeyman electrician in our state. I understand that L&I’s stance is that they are constrained by this law and are trying to do what is fair for all while still following the law. However, I don’t feel</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements temporary exceptions to apprenticeship completion for candidates seeking to qualify for the 01 general journey level examination. L&I has no other authority to delay or repeal other sections of electrical laws affected by SSB 6126.</p> <p>The purpose of the adopted rule is to provide more paths for applicants who have</p>

that they are going far enough with the proposed rules. Here are two suggestions that I would like to make:

1. All trainees that have started in the trade and have kept their trainee card current, should be exempt from the apprenticeship rules and allowed to complete the program that they started in. As more than one person stated today, it is unfair to change the rules on people part way through the program and it is definitely unfair to take away any hours that they rightfully worked and earned toward their Journey level license.

2. I believe that one of the stated reason for this new apprenticeship program was to be able to enter reciprocity agreements with other states (particularly Oregon). Since being able to work across state lines is not a goal of too many people, I suggest that L&I simply create a 2 Class Journeyman license. 01A could be for those that want to be able to easily work in other states, and 01B for those that can only work in WA without going through other states' particular requirements for licenses. We are already one of the most regulated and difficult states to get a license in, I don't see why we should make it more difficult for those who have no desire to work in the few states that want a higher standard. I heard a couple of people today actually say that Oregon licensing was better than what is being proposed in

not completed an apprenticeship to allow them to qualify for examination while we make this transition.

Starting on July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW [19.28.161](#)(2)(a)(i), effective July 1, 2023. Beginning on this date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law.

Laws provide L&I authority to create new specialties, but no authority to partition the 01 general journey level certificate.

Learn more about requirements and available programs at:
www.lni.wa.gov/ElectricalApprenticeship.

<p>WA.</p> <p>Those are my two comments on the proposed rules being presented by L&I. I will also be sending a letter to our State representatives asking for them to push for action on a supplemental bill and/or repeal/delay this law during this first legislative session.</p>	
<p>Comment #9</p>	<p>Response #9</p>
<p>On behalf of the Washington Air Conditioning Contractors Association, I would like to submit the following comments on the proposed “good cause” rules for implementation of SB 6126 regarding 01 electrician apprenticeship programs. We appreciate the Department’s recognition of the significant problems that will occur as this law is implemented on July 1, 2023 and some of the changes in the rules are needed, but the rule language as proposed, does not go far enough to help with the elements of the bill that the Department can control.</p> <p>296-46B-945(A) provides some relief for trainees seeking 01 certification however, it requires that the trainee has already obtained 4000 hours of commercial work. From field and business experience this is exactly the opposite of how most trainees get to the 8000 hour requirement. Most electrical trainees start off in the residential market and then realize that they would like to move up to commercial work, or they are given the</p>	<p>Thank you for your testimony related to the proposed amendments to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements temporary exceptions to apprenticeship completion for candidates seeking to qualify for the 01 general journey level examination. We are unable to incorporate the change you proposed to allow trainees who are not registered in an apprenticeship program to continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Starting on July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023. Beginning on this date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>

<p>opportunity to do so. As the rule is proposed, it assumes electrical trainees have started out in commercial and then allows them additional the good cause exemption to come up with 4000 more hours of commercial or fill in the balance with residential hours/specialty work. We not believe this language will provide any real relief for most trainees.</p> <p>Our organization’s proposed language change would be for proposed WAC 296-46B-945(5)(V)(A):</p> <p>A. Before July 1, 2023, they lawfully worked in the electrical construction trade for at least 4000 hours while performing new industrial or commercial installation work not included for specialties in WAC 296-46B-920(2).</p> <p>This subtle language change would grant the flexibility needed to make sure those who are currently in the trainee process do not lose hours, time or momentum. These electrical trainees deserve the opportunity to reach their goals and join a greater career path without completely starting over.</p>	
<p>Comment #10</p>	<p>Response #10</p>
<p>L&I’s plan is to use their “good cause” authority under the existing statute (2018 SSB6126) to allow people who haven’t met the working experience requirements by July 1, 2023 two additional years to accumulate hours to test.</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements</p>

However, this proposal only extends this grace to trainees who already have 4,000 general/commercial hours, and those trainees are only being allowed to work in specialties (not 01 commercial jobs) after July 1, 2023 in order to accumulate the 4,000 specialty hours (residential, communications, etc.) needed to complete the 8,000 hour requirement to qualify for the 01 exam.

This really isn't going to help any of us small rural contractors or our trainees since our market / business mix guarantees that the 4,000 commercial hours is the experience that takes the longest to accumulate. For example, we have three 02 electricians maintaining trainee cards and accumulating work experience on commercial job sites as our mix of work allows.

By July 1 of this year, these three workers will be left needing anywhere from 500 to 3000 commercial hours to qualify for the 01 exam, but they will no longer be allowed to work on commercial job sites without being enrolled in an approved apprenticeship program.

The closest non-union apprenticeship classroom (CITC in Puyallup) is 83 miles away from our shop, requiring over three hours of travel round trip for each apprenticeship class session. This is simply not workable.

temporary exceptions to apprenticeship completion for candidates seeking to qualify for the 01 general journey level examination.

Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW [19.28.161\(2\)\(a\)\(i\)](#), effective July 1, 2023.

Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.

As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentice's needs.

Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.

<p>What we need is a true two-year delay for the effective date of 2018 SSB 6126 to give more time for accessible apprenticeship programs to be set up and offered in our area. LNI has no authority to implement a true two-year delay, it would require legislative action.</p> <p>I believe this rule-making announcement from LNI is simply a smokescreen to confuse legislators into thinking LNI is solving the apprenticeship accessibility problem when in fact the action won't provide any practical relief.</p>	
<p>Comment #11</p>	<p>Response #11</p>
<p>I would like to see the rules as they are remain -- And as a small business, it affects me negatively to take away the apprenticeship program -- training program as it currently sits. I would like to see something that would benefit an apprenticeship training program for the small business. I'm five guys. So very difficult for me to start an apprenticeship program financially. So it's a financial burden for the small business. That's what I'd like to happen to it.</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program.</p> <p>L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>
<p>Comment #12</p>	<p>Response #12</p>
<p>I've been in business for over 40 years and I have trained lots and lots of electricians over the years. We usually employ somewhere between 50 and</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p>

<p>100 people.</p> <p>I don't think the system is broke. I don't think we need to change anything. It's just going to put a lot of people out of business. It's already affected my business just by knowing that it's coming up in July of '23. I have to not take as many jobs now because I know on that date if I take the jobs I would normally take and as many, I won't have people to man those in the right ratio. So we've given up several jobs to be able to try to stick to that.</p> <p>There's only two schools that are available, CITC basically and the union. The other are either programs that each of the shops would have or -- so there's really not anything to do -- you can do with that to help. So it's going to put a whole bunch of I think businesses out of business.</p> <p>So when they say the Department did some kind of study on how it affects business, they didn't do a real good job of it. So that's part of it.</p> <p>I've tried to start a school and I was told by a prior meeting that -- that when we were talking before some legislators that I think Jody Robbins had made a comment -- they asked him how long it would take to put a school together and get it approved and he said one quarter so three months. So I've been about at least 10 months</p>	<p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined that the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature. More information about how SSB 6126 became law during the 2018 session: https://app.leg.wa.gov/billsummary?BillNumber=6126&Year=2017&Initiative=false</p> <p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>
--	---

trying to put a school together. I got it all done and approved by L & I. And then it went to the apprenticeship committee. Has to go to them 45 days before their next session. When they do that, then they put it out to public hearing the last 20 days. And it got protested by CITC and the union because there's a WAC rule that says they can protest you for competition.

So the state comes up with, "Hey, you're either going to send these guys to school, start your own school," but they leave a WAC rule in place that says, "These guys can protest you because you're going to come and start teaching people to do what they do."

So I think the very first thing should have happened was that WAC rule should have went away; I mean before you even thought about starting this thing. And hopefully that can take place somewhere along the line or nobody can start any shops. And that's what those people have in mind.

So -- and there's just a lot of problems with the rule. They're taking away all the hours away from residential electricians just saying they had to have 4,000 01 hours to meet this good cause rule. They shouldn't discriminate against any hours, as far as I'm concerned.

Washington State was approved by the United States Department of Labor (DOL) to operate our State Apprenticeship in 1939. Labor & Industries along with the Washington State Apprenticeship and Training Council (WSATC) has been successfully operating a registered apprenticeship system which includes electrical apprenticeships. Washington State is currently still recognized and approved by the DOL as meeting all federal rules and guidelines for registered apprenticeship.

Requirements for starting your own apprenticeship program can be found in WAC [296-05-009](#). Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.

The WSATC has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:

General Electrician (01)

The 144 hours of Related Supplemental Instruction (RSI) for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction ("must" include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.

On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per [Electrical Minimum Guideline Standards](#))

<p>They have problems with, like I say, back to CITC and the union, all in-person classes. You can take a class and be an attorney, schoolteachers. I don't know. Probably can't get an MBA. But you can get master's degrees and all kinds of stuff. So why in the world do they have to attend a class? Why can't they do a lot of this stuff online, taking some curriculum the Department sets up that says, "You have to have this this quarter, this this quarter," have it verified, whether it go through Mike Holt or there's a lot of other organizations, and classroom time signups -- or lab time signups if they want to do that. But most of the guys are getting most of their training in the field.</p> <p>I just don't see what this rule does to, you know, to help anybody. It's just, you know, just going to put people out of business and make it harder and harder. There's lots of places across the state there aren't even any classes available, you know, up in the Okanogan, Leavenworth, all around. So I mean they're just imposing stuff that isn't well thought out. I think it either needs to just be gotten rid of or postponed for quite a while and address these other causes.</p>	
<p>Comment #13</p>	<p>Response #13</p>
<p>I was the apprenticeship coordinator in Alaska for six years. And it was a federal -- a federal apprenticeship program and I saw how that worked and how it didn't work. So to me, I like the way Washington is where anybody that wants to</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to</p>

be an electrician can go to a contractor and start gaining the hours.

There are a lot of people I found in Alaska who they just couldn't pass an exam very well or they couldn't do the interview very well. And you put them on a ranking list and then hire off the ranking list. And that leaves so many people in the dark that can't ever become an electrician if they want to become an 01, which is one good thing about Washington state that really surpasses everything, that anybody can try to become an electrician and gain the on-the-job hours and then do their continuing ed and then study for their test and take their test.

And with a shortage of electricians that we have now -- it's such a shortage and it's going to only get worse -- I'm afraid that if we start the apprenticeship program, that many of the people who want to be electricians will just fall by the wayside and they won't be able to come into the electrical industry.

So I see the apprenticeship program -- maybe if it was an alternative method, that would be okay. But I don't think it should be the only method to become an electrician.

I'm a continuing ed instructor. I've taught continuing ed for about 20 years now. And so I

qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.

L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature. More information about how SSB 6126 became law during the 2018 session:
<https://app.leg.wa.gov/billsummary?BillNumber=6126&Year=2017&Initiative=false>

Under authority provided by RCW [19.28.195](#), the adopted rule implements temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023.

Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW [19.28.161\(2\)\(a\)\(i\)](#), effective July 1, 2023.

Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

Learn more about requirements and available programs at:
www.lni.wa.gov/ElectricalApprenticeship.

<p>teach in Oregon and I taught in Alaska and I teach the Washington trainees.· So I see the apprenticeship problems in Oregon as well. And again, it just leaves so many possible people that want to come into the electrical trade – it just kind of drops them off and they have no way to become an electrician.</p> <p>So I like Washington the way it is now.</p>	<p>Washington State was approved by the United States Department of Labor (DOL) to operate our State Apprenticeship in 1939. Labor & Industries along with the Washington State Apprenticeship and Training Council (WSATC) has been successfully operating a registered apprenticeship system which includes electrical apprenticeships. Washington State is currently still recognized and approved by the DOL as meeting all federal rules and guidelines for registered apprenticeship.</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.</p> <p>As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs.</p> <p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1) (c), effective July 1, 2023).</p>
<p>Comment #14</p>	<p>Response #14</p>
<p>So I have a few things to say here.</p> <p>We're glad that the Department of Labor and Industries recognizes that Senate Bill 6126 needs fixing and has taken steps to do so through rulemaking. We do wish that these fixes would happen now as legislation as this rulemaking fix lasts for only two years.· We believe these rules do not go far enough to protect current trainees who</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018. The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p>

<p>are most of the way through their 01 path.</p> <p>The current proposed 4,000 commercial hour rule only covers a small fraction of affected trainees. We would like to see rules that cover the majority of affected trainees.</p> <p>Additionally, we would like to see rules that would deal with the lack of apprenticeship options and the looming lack of apprenticeship training capacity for independent electrical contractors.</p> <p>Lastly, we disagree with the Department's evaluation that the rulemaking and 6126 will negatively financially affect small electrical contractors. We believe additional evaluation about the rules and the cost to electrical contractors would be helpful. Thank you.</p>	<p>L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature.</p> <p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>
<p>Comment #15</p> <p>I've been an electrician basically my entire life, started doing it when I was 16 years old. I went through the trainee program. I don't think that it needed to be replaced. For some reason, we've gone to an apprenticeship program now in our state, which I think limits -- like previous testimony has said, limits the pool of electricians that will be</p>	<p>Response #15</p> <p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature.</p>

<p>going into the trade.</p> <p>I wouldn't have personally wanted to go through the apprenticeship program when I started. I enjoyed learning on my own and I enjoyed learning in the field. I don't understand why we're going to this.</p> <p>And then while we're going to it, these new rules that at least you guys are recognizing the current law is flawed, greatly flawed. But these new rules allow for only people of that committed -- or completed commercial hours to continue on in the commercial trainee program. Any trainee that has paid Washington State to have a license should be put in and grandfathered in in front of this law. No one should have to have the rules changed on them when they've been in a deal with Washington and paying for their trainee card this entire time or any other license to be an electrical contractor and electrical trainee to continue their education. 'Cuz the start of being an electrician is any of these different fields, 01's -- or 02's, 06's, whatever. The goal is to become a 01 electrician. But for some reason, the rug has been pulled out from underneath all these people.</p> <p>I also don't understand why we can't have a -- why we can't have online classes for this apprenticeship program. I don't see why businesses should have to create an apprenticeship program when there's</p>	<p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined that the adopted amendments to the rule pose no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>Washington State was approved by the United States Department of Labor (DOL) to operate our State Apprenticeship in 1939. Labor & Industries along with the Washington State Apprenticeship and Training Council (WSATC) has been successfully operating a registered apprenticeship system which includes electrical</p>
--	---

<p>online resources like Mike Holt. You can sign up to be in their program. It's like \$1,200 a year. They have online class. They meet the standards. They're currently used by some of the smaller companies that have trainee programs. You could go through their entire curriculum and not have to deal with this -- this giant burden that's going to be put onto the trainees and Mike Holt has online apprenticeship programs. You can sign up for them. They'll throw them -- and I believe when I was looking into this when we were looking at a school, that's one of the curriculums that like Titan Electric uses. They have their own school. There's other schools in the state that already use it. But I think they have to substitute a few hours with one more class because their training program has like 130 or something hours. I think Washington state might require 160. I can't remember off the top of my head.</p>	<p>apprenticeships. Washington State is currently still recognized and approved by DOL as meeting all federal rules and guidelines for registered apprenticeship.</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices. As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs.</p> <p>The WSATC has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:</p> <p>General Electrician (01) The 144 hours of Related Supplemental Instruction (RSI) for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction (“must” include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.</p> <p>On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per Electrical Minimum Guideline Standards)</p> <p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1) (c), effective July 1, 2023).</p>
<p>Comment #16</p>	<p>Response #16</p>

I'm here today to express our concern for -- well, I'm sorry -- I'm here today to express our support for apprenticeship programs and support for exemption. However, the one currently proposed is very concerning and too strict to really allow for any exemption of electrical trainees that have 4,000 hours, whether it's residential and commercial or residential and commercial and industrial.

And so we believe that the way the rule is currently written is too strict to really allow any trainees to qualify for this exemption. Additionally we have concerns with portions that the rule is not addressing and that other stakeholders have outlined over the last couple of years why this has been considered for implementation. There are still huge capacity constraints and the issue of rural trainees has not been addressed.

And so we'd like the Department to really take a step back and consider all of the issues that are currently at hand and have not been addressed when it comes to 6126. But in terms of this specific rule, we urge you to broaden the exemption to ensure that any trainee with 4,000 hours, whether it's residential or commercial or industrial, does qualify for this exemption.

Thank you for your testimony related to the amendments proposed to WAC [296-46B-945](#) to enact temporary provisions allowed by RCW [19.28.195](#), a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.

L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature.

The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.

Under authority provided by RCW [19.28.195](#), the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023.

Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW [19.28.161\(2\)\(a\)\(i\)](#), effective July 1, 2023.

Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

	<p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1) (c), effective July 1, 2023).</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices. As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs.</p> <p>WAC 296-05-015(11): A provision for granting of advanced standing or credit for demonstrated competency, acquired experience, training, education, or skills in or related to the occupation and:</p> <ul style="list-style-type: none"> (a) In licensed trades regulated by electrical, plumbing, and elevator programs at the department, apprenticeship sponsors may give advanced credit or grant hours to apprentices only up to the hours that have been approved by the appropriate licensing entity prior to the sponsor granting credit to the registered apprentice. (b) All apprenticeship programs need to ensure that a fair and equitable process is applied to apprentices seeking advanced standing or credit.
Comment #17	Response #17
<p>We have -- while those rules probably need to be done and we understand that you will do them, we have many of the same concerns that others have. It doesn't go far enough to actually help the number of trainees out there who are going to be hurt by the implementation of 6126 on July 1st.</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal laws requiring apprenticeship enacted by the legislature.</p>

We need 01 electricians now more than ever. Recent Building Code Council actually which go into effect on July 1st will result in more electrification of residential construction and commercial construction across Washington state. The pathways to get to being an 01 electrician need to be as expansive as possible and we should not limit them at all.

We understand the Department's constraints in terms of what you can do, but we think that your good cause exemption doesn't go far enough and doesn't really recognize the extreme issues that happened particularly during the pandemic in terms of capacity with the limitations on the number of trainees and apprentices who could be in classroom experiences, the impact on construction overall in terms of the workload, et cetera, and lack of labor for those contractors and so needing to make sure that people are doing this work.

We do believe that this is going to have capacity -- particularly has had impact on our rural, our small contractors, our open shop contractors. But even our union contractors have had these capacity issues and the labor workforce shortages.

So we think that these rules -- the number one thing in terms of your ability under 6126's limitations is to look at expanding the hours that

The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined that the adopted amendments to the rule pose no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.

Under authority provided by RCW [19.28.195](#), the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023.

Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW [19.28.161\(2\)\(a\)\(i\)](#), effective July 1, 2023.

Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.

The Washington State Apprenticeship and Training Council (WSATC) has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:

can help somebody get to the good cause exemption. Many of our trainees -- you have a lot of 02's and other types who have been working in residential and specialty construction who are 01 trainees but their work has primarily been over the last few years in residential and specialty construction, and they were hoping to move on to commercial later. That needs to be recognized because we need these people to be able to get into the apprenticeship programs. But also we need these trainees to become 01 electricians as soon as they possibly can. They've been getting the training. They've been doing the work. Don't take that away from them. Let them move forward by expanding this.

It's a simple fix in the law. Just take away those restrictions on having to be commercial or having to be a certain type of work, and you could actually expand this good cause exemption and do some good with this rule. We do appreciate the recognition that there are some issues that are happening with the implementation of 6126, but we think that with the pandemic and all of the other things and the capacity issues, that you need to expand this now so that we can capture more of these people and get more electricians out there.

General Electrician (01)

The 144 hours of Related Supplemental Instruction (RSI) for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction ("must" include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.

On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per [Electrical Minimum Guideline Standards](#))

For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1)(c), effective July 1, 2023).

WAC 296-05-015(11): A provision for granting of advanced standing or credit for demonstrated competency, acquired experience, training, education, or skills in or related to the occupation and:

- (a) In licensed trades regulated by electrical, plumbing, and elevator programs at the department, apprenticeship sponsors may give advanced credit or grant hours to apprentices only up to the hours that have been approved by the appropriate licensing entity prior to the sponsor granting credit to the registered apprentice.
- (b) All apprenticeship programs need to ensure that a fair and equitable process is applied to apprentices seeking advanced standing or credit.

Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.

	As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs.
Comment #18	Response #18
<p>We're a small shop in a rural area. And when these new laws are going to take effect for our apprentices, our trainees, it's really going to impact them.</p> <p>Right now we have two choices. We can join the union or join CITC. That's the only way that my apprentices, if they want to move on to get their 01 licenses, that's the only direction they have.</p> <p>The choice with the CITC, they're three hours away in travel time, being gone away from their home for over two days and what the impact of that would be and the cost.</p> <p>We do a lot of mixed use work here in Leavenworth. We're a small shop in a small town that we have relationships with our businesses in the area. We have a lot of emergency calls that we come up and do. And for us, we take our 01's; we grab our trainees, our 02's, and we go and we help them out. But under this new law, we're not going to be able to grab those 02's or the trainees unless they're in that approved apprenticeship program. And it really hampers a lot of the small businesses like myself throughout Washington state.</p> <p>This law needs to be changed, needs to be</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined that the adopted amendments to the rule pose no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023. The law provides no further authority to make any other provisions.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p>

<p>modified. Anyone that has been in the electrical industry like I have for almost 40 years, you know, the hours – we agreed to come into this and we went back to the state certifications of what we have to do for our CEUs. All of our hours have to be registered by L & I, who we are extremely monitored by L & I in all realms of this.</p> <p>Now when those apprentices going into a training program, those hours aren't going to be accredited by those training programs, you know. So they have 4,000 hours residential, 2,000 hours commercial, they – the training facilities get to choose how many hours or what year they're going to put those apprentices in. And that's wrong. It's an abandonment of hours. And those are personal property hours those people worked through the state guidelines, which we're registered to do.</p> <p>I ask that we at least suspend this law or give us more time, especially the rural contractors. We don't do commercial work every single day. And that's really going to impact these apprentices as they're trying to move on to get their 01 licenses, especially as they're 02's.</p> <p>And as many have said, we have a lot of residential work going on in the state of Washington at this time. We're also looking to expand that for affordable housing. But when you start taking this type of program where every 02 -- or most 02's</p>	<p>Beginning July 1, 2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.</p> <p>As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well. Electrical apprenticeship programs are exploring Supportive Service resources to help assist rural apprentices in their travel costs associated with attending Related Supplemental Instruction (RSI).</p> <p>WAC 296-05-015(11): A provision for granting of advanced standing or credit for demonstrated competency, acquired experience, training, education, or skills in or related to the occupation and:</p> <ul style="list-style-type: none"> (a) In licensed trades regulated by electrical, plumbing, and elevator programs at the department, apprenticeship sponsors may give advanced credit or grant hours to apprentices only up to the hours that have been approved by the appropriate licensing entity prior to the sponsor granting credit to the registered apprentice. (b) All apprenticeship programs need to ensure that a fair and equitable process is applied to apprentices seeking advanced standing or credit. <p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours</p>
---	---

<p>want to become 01's, you're going to end up having those 02's move over to this apprenticeship program and they no longer can do residential work, which now is going to gut the residential industry when we need 02's and 01's to keep this progress going. And with this law, it's going to stifle the industry. You're going to bottleneck them, and it's going to tie our hands.</p> <p>So that's pretty much what I gotta say on that. And I hope L & I -- I agree with L & I. You guys – your hands are tied. You gotta follow the law that was put into effect. And we just ask that you guys, you know, take this all into consideration when you do these amendments on these laws.</p>	<p>for previous experience. This is based on L&I review of state law (RCW 19.28.191(1) (c), effective July 1, 2023).</p>
<p>Comment #19</p>	<p>Response #19</p>
<p>I appreciate that L & I recognizes that Senate Bill 6126 is flawed and that you're making an attempt to correct it. I think the root of the matter is that Senate Bill 6126 is about money and control and it takes away some of the freedoms from small, independent electrical contractors. I think the programs – the apprenticeship programs in place have an agenda.</p> <p>I have a son that has a master's degree from WSU and has applied for the apprenticeship programs. And because he doesn't meet the agenda of some of the apprenticeship programs, he hasn't been allowed into the program. So we're pursuing the training -- trainee program, which, of course, I feel</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined that the adopted amendments to the rule pose no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p>

<p>works well as it is.</p> <p>And I agree that anybody with a current trainee card at this point in time should be allowed to finish the trainee program that they started, whether it was five years ago or a week ago. You can't just pull the rug out from underneath somebody that has started a program and is currently law.</p> <p>And I appreciate the opportunity to speak here. Thank you.</p>	<p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023. The law provides no authority to make any other provisions.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Starting on that date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>For Apprenticeship Equal Employment Opportunity Requirements please see WAC 296-05-400.</p>
<p>Comment #20</p>	<p>Response #20</p>
<p>I'd like to give my support in delaying this law as this law heavily disincentivizes residential construction. The housing costs are going -- growing at an exponential rate and this is one of the reasons why. If we have a smaller pool of residential electricians, then the cost to do those</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>This new law makes no new requirements for 02 residential specialty electricians.</p>

<p>projects are going to go through the roof.</p> <p>And as a person who does a lot of maintenance, if I have to solely focus on commercial hours, then the people that -- the customers that I serve are going to be at a huge disadvantage.</p>	<p>Only trainees doing work limited to 01 journey level electricians and candidates for 01 exams are affected.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>
<p>Comment #21</p>	<p>Response #21</p>
<p>The electrical trade is a valuable and important occupation for the future growth of the Pacific Northwest. And I'm thankful that it has become important enough to ensure that we have quality trained electricians in our workforce for years to come.</p> <p>Within my time in business, we've employed several hundred electricians, had over 50 attain their specialty 02 electrical license, 20 their general 01 electrical license, and seven others that have opened up -- gone on to open up their own business. It's safe to say that we've trained our workers the right way.</p> <p>Although I believe the idea of 6126 has merit in forcing the entire industry to have trained electricians, I also believe that the bill as written is flawed and will result in a loss of workers in our industry. Requiring that electricians wishing to work in the commercial and industrial sectors be enrolled in an apprenticeship program sounds great if there were enough programs and seats available to ensure all trainees and apprentices</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal, delay, or modify laws requiring apprenticeship.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined that the adopted amendments to the rule pose no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices. As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well.</p>

<p>could enroll.· Presently there are only a few programs outside the union and CITC programs.</p> <p>As a midscale contractor with no interest in being part of the IBEW, that leaves the CIT as the only other available program, something we feel charges far greater than the value given, especially when we can provide similar or better training.</p> <p>The commercial electricians we've hired, both permanent and temporary, that completed their training in the union were much less qualified as well-rounded electricians than the ones that went through our program. I have reached out to the Department of L & I to become a registered training agent as published on their website. In conversations with them, it was clear that they had no interest in assisting our endeavor unless we exhausted our options and joined the union or the CIT first.· And then we were informed that we would not be able to get the certification without expensive lawyers costing several hundreds of thousands of dollars in fighting the system so that we could just comply and join. This is not what I expected from a free and capitalistic society. Limiting training agents to only CITC or union programs will limit the number of workers available in an already limited labor pool and impact many employers to stay in business. These items alone will have a negative impact on the construction industry.</p>	<p>Currently Washington State has 11 approved 01 electrical apprenticeship programs.</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p>
---	---

Not only will this law as written impact new workers, but it will push out many that have worked for years to become certified journey level workers, only to put a roadblock in their path.

Personally we have current contracts that may have completion dates impacted, projects we've negotiated that we may not be able to fulfill, and longtime customers that may need to find other firms to work with.

Laws change every year. Codes are updated in our industry every few years. These changes generally have a phase-in period or a grandfather clause. Those that are instant do have a means to comply. I understand it may be difficult to work through these issues, but this is something that should be happening. Taking such a hard line such as this bill proposes will affect everyone, employees, employers, businesses, customers, jurisdictions. It appears that this law is an attempt to level the playing field for the union contractors to be more competitive against the merit shops in the private sector.

I hope the committee will review all the implications this law will cause and come up with solutions to clean up this broad bill. This bill is due to begin July 1st of this year, and I hope the committee will consider delaying the onset to figure out the best way to proceed and make sure

<p>that enough quality programs are available to train our workforce.</p> <p>Like the Washington Cares Act and the Real ID program, these programs have their issues and limitations. And providing the time to work through the issues was the right thing to do.</p>	
<p>Comment #22</p>	<p>Response #22</p>
<p>It sounds like a lot of you guys are catching onto the same thing that I realize, the unions are forming against us.</p> <p>I'm curious. This is a rhetorical question. How much of the board came from a union or is paid by unions?</p> <p>I'm curious, like in the stakeholder group to try to work out the details of this law, how many percentage of those people represent us or unions?</p> <p>I can tell from watching all the board meetings or reading through all the transcripts that when they have board meetings, they speak in a code. They will say something. If they get to an important detail that can be used against them, they say, "Let's speak about this in private in our sub commissions instead of having it published." So we can all tell that the unions are working against us.</p> <p>Another obvious instance of this, since we created</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>The adopted amendments to the rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Electrical Board membership is regulated by RCW 19.28.311. The Washington Open Public Meetings Act (OPMA), codified in chapter 42.30 RCW, requires that all meetings of governing bodies of public agencies be open to the public.</p> <p>Find out more about the Electrical Board: https://lni.wa.gov/licensing-permits/electrical/electrical-board.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>

<p>this code, we have all expressed how this is going to ruin our business. They have reached out to try to find electricians from other states. They have gone to create a reciprocity being with Oregon in which they are not required to do -- or not held to as high as standards as they are trying to hold us to. They know they are creating a conflict for all of us. We have all been expressing our frustrations, and they're not listening to us.</p> <p>So I'm not here to speak to the board. I'm actually here to speak to the rest of you. We need to take matters into our own hands and organize together. I will have a website up soon, within a couple hours. I currently have an email if you guys can all take out your pens, andrew@andrewselectricseattle.com. I will have a website up. Please reach out to me. We can organize together. Not one of us can defeat them on our own. We do not have enough money on our own to take matters into our own hands. But if we work together, we can make something happen here. So once again, that's andrew@andrewselectricseattle.com.</p> <p>I'll have a website up soon. I will have letters drafted by lawyers where we can work together and defeat this crevice.</p>	
Comment #23	Response #23

We have around 45 apprentice and journeymen at our company. And the main thing that I want to say is I've been listening to all the points that other people say and I agree with. I think the biggest one that I think needs to be heard is right now Rainbow Electric actually is part of CITC. We did this three years ago. We currently are part of CITC.

We went into this knowing that this bill was going to be passed. So we currently do participate. But the bigger picture that I see is great on this bill is coming, there's notice. There are issues. But my biggest one is we're hindering the entire electrical trade in Washington, the biggest one, just like all these other individuals that have smaller shops. We're about 80 percent commercial. And like I said, we're – already have our guys, individuals, in school for this. But it's going to hurt everybody else.

And I agree with what everybody has been saying on here, very much so. What I was trying to say and get at before I kind of had that technical difficulty was that it's overall just -- just by having this exist, we're actually -- we're detrimental to the entire trade. It is hurting all of the small shops as I hear the 02's will probably have a difficult time ever transitioning out and over to become 01's.

All of my electricians in our office are 01's. We currently do participate in CITC because we knew

Thank you for your testimony related to the amendments proposed to WAC [296-46B-945](#) to enact temporary provisions allowed by RCW [19.28.195](#), a new section created when the legislature passed Substitute Senate Bill [6126](#) in 2018.

L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.

Learn more about requirements and available programs at:
www.lni.wa.gov/ElectricalApprenticeship.

<p>this was coming down the pipe. We knew this was going to be something we were going to have to battle with and we didn't want any of our apprentices to have that issue. We do like 80 percent commercial, so we are a little bit larger.</p> <p>But overall, I have people walk through the door daily and all of them want to -- "Hey, I want to become an electrician. I want to start my career."</p> <p>And all of these individuals that are trying to do this, we're all getting pigeonholed and bottlenecked by just having CITC or the union. And really what we're doing is we're hurting every -- like for the entire trade just by having this rule in place. So I feel like it's just bottlenecking great young individuals that would like to get into the trade by forcing them to go to this school.</p> <p>And I -- I say this thing should be delayed far, far, far out. Even though we're already in compliance with it and we have been doing it, I think it just hurts the trade in itself.</p>	
<p>Comment #24</p>	<p>Response #24</p>
<p>I am co-owner with my husband of Shocking Difference, LLC, which is a small electrical contractor here in Olympia. We are a non-union shop and currently most of our journeymen that we have on staff, we have trained in-house. We have our last -- our five trainees right now registered to us and we have four journeymen. So</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018. L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to</p>

<p>we work typically on almost a one-to-one ratio training our residential electricians.</p> <p>We do some commercial work, not very much. But this impacts us in a huge way because when we are looking to hire someone, we can no longer offer them any opportunity to become a commercial electrician without entering into an apprenticeship program.</p> <p>The apprenticeship program is run out of -- the only ones that are available to us are run out of CITC, which is in Bellevue. Now if any of you live in Olympia and have tried to drive to Bellevue, that is not very efficient after you've worked an eight-hour day or every other weekend or whatever the class schedule is that they're requiring you to be present for.</p> <p>I am incredibly frustrated with our government, who has been allowing the union to run L & I, which is what they're doing. This trainee program had nothing to do with unions. However, the unions have taken control of L & I and the trainee program, which they should have no say in. They have their apprenticeship program already. They do not need to impact non-union shops. This legislation only affects non-union shops. It does not impact unions at all.</p> <p>However, what I have noticed is that all of the new</p>	<p>qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023. The law provides no authority to make any other provisions.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Starting on that date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Specialty electricians do not lose credit for their specialty experience. 2018's SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in 01 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they</p>
--	--

<p>apprenticeship programs, except for I think two that were their own shops, are all new union shops. So the union has used this legislation oncoming to expand their reach, and they now have like six more programs than they had three years ago.</p> <p>And unfortunately for non-union shops, you guys have added absolutely zippo apprenticeship programs for non-union shops and except for like two or three that are huge non-union shops that have the ability that do mostly electrical commercial work.</p> <p>So for a small business like mine that only does a little bit of commercial work, I cannot even give my guys the benefit of those commercial hours to work toward the license. If you go into an apprenticeship program, I have to put my guys in there. And can they do residential work? Yes. But am I paying for them to go to an apprenticeship program to become a commercial? It creates this huge grand canyon between a specialty license of any kind and a commercial license.</p> <p>And this revision that you have suggested has no implications for someone that already has their specialty license. When I read this, there's nothing there that says if they already have a special license – a specialty license, they're going to be guaranteed entrance into an apprenticeship</p>	<p>fulfilled their program’s educational requirements and gained 4,000 hours of industrial/commercial experience.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.</p> <p>As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well.</p> <p>Since 2018, there have been six (6) new 01 electrical apprenticeship programs. None are on record to be affiliated with any organized labor partner.</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p> <p>WAC 296-05-015(11): A provision for granting of advanced standing or credit for demonstrated competency, acquired experience, training, education, or skills in or related to the occupation and:</p> <ul style="list-style-type: none"> (a) In licensed trades regulated by electrical, plumbing, and elevator programs at the department, apprenticeship sponsors may give advanced credit or grant hours to apprentices only up to the hours that have been approved by the appropriate licensing entity prior to the sponsor granting credit to the registered apprentice (b) All apprenticeship programs need to ensure that a fair and equitable process is applied to apprentices seeking advanced standing or credit.
---	---

<p>program to allow them to become commercial electricians.</p> <p>I cannot believe how -- how our government has allowed -- in a free capital state, they have allowed this. And it's small contractors like us. All of these people speaking at this meeting are all small little shops. We're not great big huge 400, 500 employee shops.</p> <p>And I don't understand why the IBEW is controlling what is impacting all of these shops.</p> <p>And everybody that's on the committee that has designed these rules, I don't see anybody on that committee that's these small little shops. I don't know how you guys, respectfully, are getting information from small shops to develop these rules. These rules when I read through them, they are not developed by small independent shops. They're developed by the union. I can tell just by reading it. And it's like it's not right. It's not fair.</p>	<p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1)(c), effective July 1, 2023).</p>
<p>Comment #25</p>	<p>Response #25</p>
<p>I think that there's many flaws with 6126. I really think that we should, at very least, delay this law until there are equitable solutions for education on this.</p> <p>As previous testimony has said, CITC and the union are pretty much the only two options right now. And other fellow contractors have -- that we know have tried to get their own education programs</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>

pushed through. And CITC and the union throw their -- their lawyers at it and they block them from getting these -- their own training programs approved.

So this should at least be delayed until there are virtual learning solutions and -- and that there are at least more -- more training programs available than just these two options. Because obviously people who live out on the peninsula or Olympia, they can't even get to this CITC school in a timely manner.

Washington State was approved by the United States Department of Labor (DOL) to operate our State Apprenticeship in 1939. Labor & Industries along with the Washington State Apprenticeship and Training Council (WSATC) has been successfully operating a registered apprenticeship system which includes electrical apprenticeships. Washington State is currently still recognized and approved by the DOL as meeting all federal rules and guidelines for registered apprenticeship.

Requirements for starting your own apprenticeship program can be found in WAC [296-05-009](#).

Under WAC [296-05-011](#), objections may be entered by a competitor.

Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.

As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well. Electrical apprenticeship programs are exploring Supportive Service resources to help assist rural apprentices in their travel costs associated with attending Related Supplemental Instruction (RSI).

The WSATC has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:

General Electrician (01)

The 144 hours of RSI for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction ("must" include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.

	On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per Electrical Minimum Guideline Standards).
Comment #26	Response #26
<p>I represent myself. And my question is like all people have already said, the same thing, actually complaining about all the existing regulations and the new one. So my -- like I agree with all of them because like -- like I told before, I want to apply for a new electrical program. I want to be apprenticeship.</p> <p>But I checked all website L & I about how to apply. Most of information is not valid. I cannot reach any company with my application. Most phone numbers doesn't work. So in Everett, it's very hard to apply to be an electrical trainee. Even like I don't have any offices from union. I don't have any schools who can train me. And I don't have any employer who can afford me because right now living is expensive.</p> <p>Another thing, when we implement the new regulations, right now all customers cannot afford electrical charges. So if we're trying to hire an electrician to replace an electrical -- well, so in apartments, it's written like commercial property. So my question, how many hours I need to get to change the bulbs in apartments? Because we need to create the regulations which will help customers and providers. So the customers, it's -- we -- you</p>	<p>Thank you for your comments. The proposed rule you commented on just pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination.</p> <p>Businesses that do electrical work on the property of others have to be licensed electrical contractors. Learn more: www.lni.wa.gov/ElectricalContractorLicensing If you want to focus on residential maintenance work, the 07B specialty electrician can repair and replace electrical equipment as described in WAC 296-46B-920(2)(i). You do not have to be a certified electrician to work on plug-in appliances or change light bulbs.</p> <p>Candidates for the 07B exam have to work under 100% supervision for 720 hours to qualify for examination. When they pass, they can work by themselves without any supervision. Once they have worked 2,000 hours they are eligible to apply for certification. Hours for 2,000 hour specialties cannot count toward the 8,000 hours required to qualify for the 01 journey level examination. However, hours for 4,000 hour specialties can be counted towards exam eligibility. Information about qualifying for a certification examination is found in WAC 296-46B-945.</p> <p>The new rules do not prevent anyone from obtaining a training certificate and going to work as a specialty electrician. Once they have their training certificate, they need to find an employer that employs certified electricians to supervise them while they learn. Learn more at: www.lni.wa.gov/ElectricalTrainee.</p>

know, we should have afford this service.

And I'm like a provider. From another side effect trying to open my own electrical company in the future, I need to have fast access to the licenses, you know. I don't want to avoid any rules. I agree we need to be trained. We need to be examined properly. But like how many -- how much money I need to put to get to be, and times, how much I need to spend to be a commercial electrician and residential electrician? And how I can switch from one license to another? It's thousands of hours, you know. For me needs to be done is I need to spend all my life to get the industrial license to change the bulbs in apartments or, for example, change the microwave in apartment. What license I should have?

Because we need to have a -- we have a simple questions, you know, regular business scenarios. And we need to solve it fast. And it should be affordable service. Because right now I'm kind of independent.

Most of my customers complaining we cannot find electrician who can do for us small jobs for affordable and reasonable price. Right now everybody's locked in the high prices and only like the previous guy said in his testimony, right now all the regulations lobby the large corporations in electrical industry.

If somebody wants to become a 01 general journey level electrician, new regulations now make things more formal. In addition to obtaining training certificates, trainees need to become registered apprentices.

Learn more at:

- Appliances: <https://www.lni.wa.gov/licensing-permits/electrical/electrical-basics-for-home-business-owners/appliance-installation-and-repair>.
- www.lni.wa.gov/ElectricalApprenticeship.

For information on how to contact a registered apprenticeship program to apply visit: L&I [Apprenticeship website and use the ARTS search by county and occupation](#).

Small businesses like me, I don't know -- I cannot find an answer for how I can get right now into an electrical business, either residential or commercial.

Because like I said, I tried everything. I applied to so many companies. Nobody need a trainee at this moment. And if they need to have a trainee, I'm not sure if they will train me properly so I can be an electrician in the future. Otherwise, yeah, I need to go to union. But we need to protect union or we need to protect people in live in the Washington state? We need to help people to have affordable electricians every day. Or we just need to be locked like in no way with all these regulations.

Because I will be happy if somebody from L & I can contact me after this meeting and say, "Dmytrii, we have an opportunity tomorrow. In your city, you can apply for electrical trainee and start your career in residential or commercial." You know.

And for me, like I said, to change the electrical bulbs or something else in apartments, I mean I don't need to have 4,000 hours to change the electrical bulbs in the hallway or, for example, to unplug this stove and plug it back in the apartments. So we need to be more simple, you know.

I'm not planning to do a new wiring in apartments

<p>because they're already built. You know. I'm asking about the simple jobs, if the Department can answer me how I can get this license very fast. And I'm thinking most of the people who attend today, most hate the electrical department for all these regulations. I don't know about the other states. What the particular lady say in Alaska it was good. In Oregon it's good. It's very bad in Washington state, the laws, very bad, very slow. Nobody can answer all those questions. All those regulations, like people said, this make our lives more complicated. I want to have a decent life.</p> <p>Like you seek driver's license, you go to school. Schools on every corner. Pay fees, pass the test, test, the practice, and let's go driving. City of -- all the licenses. We don't have a shortage with the drivers. But we have a shortage with electricians. So we need to do something with this. We cannot ignore this problem. We need to start working for people, not for big companies.</p> <p>This what my message. And I think the Department will start working to help electricians to work better and for the customers because we servant for people. We need to have a good service and the service should be affordable.</p>	
<p>Comment #27</p>	<p>Response #27</p>
<p>I'm an owner of a small contracting company North Wave Electric in Bellingham, Washington. I employ four, five, six people at a time we do a mix of work</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p>

<p>between residential and commercial, do definitely more work on the residential side than commercial. And we've been supporting customers in Bellingham doing small retrofits and repairs, new circuits, kind of the smaller work that the bigger shops don't do for almost 20 years now.</p> <p>And we have, you know, usually one to two 01 electricians at any one time. And right now we have one. And we would -- in this -- you know, with July 1st coming up and the apprenticeship program requirements, we will only be likely having one apprenticeship or one trainee in the apprenticeship program.</p> <p>And we have -- since we have such a low quantity overall of commercial work, say 25, 30 percent for one of my guys in my company currently, we have a very hard time trying to give the hours for our trainee to be able to be kept in the program. There are fears -- some unknown fears potentially, but there are fears that our trainees will be moved around when they're not getting appropriate hours if I were to be using the program like CITC, which again has been proved many times now is the only open shop trainer for most of the state, maybe all the state honestly.</p> <p>So we, as a company, would love to be able to train our own employees. The apprenticeship program requirements are very heavy and somewhat</p>	<p>L&I has no authority to delay, repeal, or modify laws requiring apprenticeship enacted by the legislature.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices. As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well.</p> <p>The Washington State Apprenticeship and Training Council (WSATC) has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:</p> <p>General Electrician (01) The 144 hours of Related Supplemental Instruction (RSI) for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction (“must” include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.</p> <p>On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per Electrical Minimum Guideline Standards)</p>
--	---

unrealistic for most small contractors maybe under 30, 40 employees who can't afford full-time trainers to really implement. And I believe there really needs to be an option for contractors of all sizes, being a two-person company, three person company, to be able to take on training in-house and have a system that they can manage within their own company to help bond or keep the company strong, keep training in the area where the employees and the contractors are located, minimize travel time.

With our world nowadays with all of our online options and our strong, you know, connectivity and again programs like Mike Holt Enterprises -- they're amazing. They're around a long time. I've had many conversations with them. And they want to help out for the state of Washington's apprenticeship needs. They have programs set up already. They're ready to go. But being that there's no online exemptions for our apprentices to have a program and nothing really set up for our shops to set up. This is needing some changes.

So all in all, I know this all takes a lot of time. I know and appreciate again L & I -- or I do appreciate L & I recognizing that there needs to be some alterations to this. And I hope that some changes, some ideas, can come out to really support everyone in all the different ways that the independent contractors operate, which is broad. Because we went from apprenticeships only being

<p>in more the union big shop world to now everyone in every size and every flavor across the state needing to incorporate this. And this is not a one-size-fits-all shoe.</p> <p>So I guess best thing I can say is it that I think a delay is absolutely necessary. I think that more time, now that everyone's finally talking about it, you know -- we're four and a half years in since the bill has passed, but yet we're just now having this conversation. So it seems like we're needing to extend the time needed to do the research to help out everyone in the state to make sure that every contractor, from someone in middle of Seattle who only has two employees to a contractor out in the islands who has no possibility for getting -- really can't even get on a ferry, right -- was riding the ferries lately, but they're not great -- and to the rural contractors. Everyone should have an opportunity keep their business model moving forward. So more options I believe need to be sorted out before this gets fully pushed through.</p> <p>But thank you for your time, and I look forward to seeing some solutions.</p>	
<p>Comment #28</p>	<p>Response #28</p>
<p>I'm residential electrician with trainee card.</p> <p>My whole questions are surrounding my accessibility to maintain and still work towards my 01 hours. I am pretty -- pretty close to it. Now, I --</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p>

you know, I was laid off from -- you know, during COVID and stuff and, you know, everybody, you know, knows how it was, you know. Job sites kind of had to shut down. So I think that had a lot to do with me being held back on a little bit of my hours. But I've been able to steady maintain hours.

And I do hold a residential 02 card that I was able to obtain many, many years ago. Had to maintain both the trainee card and the residential card to work for the commercial contractor that I currently work for.

Now, my question is: Am I going to be allowed to have a little bit more time if I can't make this cutoff? I'm almost there. I'd be like a few hundred hours shy, if that, on July 1st. So my question is: Like the guys that are already carded out at 02's because they weren't given all their 01 hours but needed to card out for the company, you know, I -- my whole pursuit was my 01 card. I kind of got stuck and was audited and denied some of my 01 hours so I was unable to obtain that card. But I continued on working. And through layoffs -- I've been laid off a few times here and there. But I've steadily strived to get my 01 hours.

I just want to know if me and other 02 electricians that also maintain the trainee card are able to continue on and still get our projected 01 card, you know, before this is all up and then -- then I have

The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program.

Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023. Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW [19.28.161\(2\)\(a\)\(i\)](#), effective July 1, 2023. Starting on that date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

If your records indicate that you have worked all the hours needed to qualify for examination. Request an affidavit from your employer using an [Affidavit of Experience for Washington Electrical Trainees](#) (F500-149-000).

Use our [Verify](#) tool to confirm that you have enough hours of work experience on record to qualify for examination. When you do, apply [online](#).

<p>to go backtrack and go back to school and I can't work for the company I work for anymore, which I mean I have a 401 with this company. I've been with them for a while. I love them.</p> <p>So I'm just a little scared that this is going to turn my whole world upside down. And if I want to pursue my role, I have to like go back to school and jeopardize losing my home because I have a mortgage to pay. So I don't know. I just feel like -- I feel like me and a number of kids that went to Perry Tech or kids that are already O2's with trainee cards are kind of getting screwed over. I've maintained a trainee card for 10 years now trying to get my O1 hours, so it's been some time. Anyways, that is all I have to say. Just wondering where I stand with that.</p>	
<p>Comment #29</p>	<p>Response #29</p>
<p>And a couple of points were brought up that I would like to talk about. That is the fact that the only apprenticeship programs right now are Local 48 and CITC. And several years ago I thought -- I teach mostly in the Vancouver area Longview, the Columbia Gorge. And these people have to come a long way just to get their continuing ed classes. There are very, very few instructors. CITC comes once a year or twice a year. But that's definitely not enough.</p> <p>And so I see a huge problem with there not being enough apprenticeship programs that are certified</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>Currently Washington State has 11 registered electrical apprenticeship programs. Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p>

apprenticeship programs for people to go to, especially, like everyone has said, the rural and the people who are a long way off. They have to drive quite a long ways.

And the second problem with that is if it's only CITC and Local 48, again, they only accept a limited number of people in their program. And everyone else who wants to be an electrician is just again out the door.

So again, the main problem here is we are limiting the number of people that can become electricians. And there's a shortage already. And we need to allow people who are wanting to be an electrician, we need to be able to give them the chance to become one. And if they can't -- if they can't live somewhere near where they can go to an apprenticeship school, then again, they're just dropped off. And so in order to maintain the number of electricians that we really need in Washington --

When I teach classes, I hear from a lot of the contractors who say, "Do you know anybody who wants to be an electrician? Do you know where there's any 01's maybe that would like to go to work? I have so much work. the 02, with all the housing developments that are going on."

Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.

As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well. Electrical apprenticeship programs are exploring Supportive Service resources to help assist rural apprentices in their travel costs associated with attending Related Supplemental Instruction (RSI).

The Washington State Apprenticeship and Training Council (WSATC) has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:

General Electrician (01)

The 144 hours of RSI for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction ("must" include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.

On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per [Electrical Minimum Guideline Standards](#))

<p>So we need to provide a path for those people to become qualified individuals as well and not limit it to just a certain number.</p> <p>And when I was teaching a couple of years ago, I told somebody -- I was teaching at a contractor and I told that contractor, "I think I'm going to open a school in -- down near Vancouver for the Columbia Gorge."</p> <p>And he goes, "Oh no, you're not. That territory is already taken."</p> <p>So I can see how there's going to be a problem when people are trying to become certified apprenticeships, that they're going to have a big battle in front of them. And that only hinders everything again.</p> <p>So I really believe that Washington should stay the way it is and maybe, again, make it an option. If they want to go to an apprenticeship program, okay. But if they want to have on-the-job training and have the ability to become a qualified person without that, that should remain open, especially for the smaller contractors.</p>	
<p>Comment #30</p>	<p>Response #30</p>
<p>Why in the world are we making this change? Because the current system is not broken.</p> <p>I've trained literally hundreds of journeymen</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p>

electricians with the current system.· And, you know, you gotta remember that this current system, we're still required to have 24 hours, 48 hours worth of continuing education. Everybody's gotta go to code classes.

I think there's some sort of an idea that if we don't go to the CITC program or go to the union program, that the people that we're turning out are not qualified, which is completely false. We have to have qualified -- we do some larger jobs. We have to have good, qualified, knowledgeable electricians out there because the code book's written by the fire department. We could burn something down.

So let's just remember that this change for the education isn't because the people that are getting turned out are not -- are not trained and don't know what they're doing.

The other thing, asking somebody in this day and age-- I mean it's ironic to me we're all having this Zoom meeting. We're all able to participate. But you're going to require a guy that lives in Leavenworth to drive three hours to go a brick a mortar school and won't let him do it virtually?· I mean that's ridiculous.· It doesn't even make any sense.· And I think the people that wrote that into that bill, they know that. But --So anyway, and then I would also say that the denial of the hours --

L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.

The Washington State Apprenticeship and Training Council (WSATC) has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:

General Electrician (01)

The 144 hours of Related Supplemental Instruction (RSI) for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction (“must” include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.

On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per [Electrical Minimum Guideline Standards](#))

Changes to standards must be approved by the WSATC, and L&I has no authority to modify minimum guideline standards.

<p>I heard what that last guy was talking about, how you gotta maintain a trainee card while you have an O2 card. I mean all of these systems are in place right now and they're not broken. But that guy's going to get screwed if they won't allow his hours when he -- when July 1st rolls around.</p> <p>This -- this needs to be rethought out, needs to be delayed, and there have to be some other options. I mean what's wrong with Mike Holt? He's recognized, virtually been doing training and education for 40 years that I know of. And yet Washington state won't allow him to educate the electricians like he does in many states, Florida, all over the place.</p> <p>So we need to take another look at this thing and get something that's reasonable, that can work, because this will not work. It's going to be a disaster, especially for the builders and the developers. And they're the ones that have all the money and keep all of us working. It's not going to be a good fit.</p>	
<p>Comment #31</p> <p>And I'm just puzzled at what the intent is for this new law. Right now everybody is having a hard time hiring electricians. This is not going to incorporate excitement for the industry and actually attract people to the industry.</p> <p>I've been an electrician for 40 years. And I've</p>	<p>Response #31</p> <p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p>

<p>recruited at the high schools, community colleges, done everything I can to incorporate people into the industry, and started with a merit shop. And we struggle bringing people into the industry. This is just going to pull away and eliminate people that have a future. We're trying to get young men and young women to be excited about the industry and actually go in and learn. This does nothing to enhance the industry and actually attract people to it; just the opposite.</p> <p>I'm a third generation electrician. All three generations were brought up in merit shops and trained. As far as I'm concerned, everybody was very well qualified and do a great job. A few family members have gone into the union and done high-rises and worked on the stadiums and things. But in general, most everybody's been pretty well qualified. But this is -- we're having a hard time hiring electricians right now, and this is not going to help us attract people and grow the industry. It's going to actually shrink it and just put more control within the unions.</p> <p>Anyway, that's -- that's about all. Just seems very unfair and very controlled by an entity that has been trying to fight for control for a long time.</p>	<p>This legislation has no effect on those training to become specialty electricians.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>
<p>Comment #32</p>	<p>Response #32</p>
<p>There were several people asking about, you know, who's representing and nobody from the non-union trade, which is -- or companies, which is true. When I was -- I got called out to October on</p>	<p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>

<p>this apprenticeship program of mine at the apprenticeship council's annual meeting. And as I was listening to them before I got up and testified before them, they had somebody from CITC get up and talk and gave a report on -- they're on a subcommittee, CITC is, and gave a report on how they're doing on working on these rules, some of them I'm sure we're talking about right now.</p> <p>And somebody from the board said, "There's only two of you guys on the committee. Don't you need some other help?" She said, "No. Just us and the IBEW are fine." So those are the two people representing us on the subcommittee for L & I on these rule changes. I just wanted to bring that up and tell you guys about that.</p>	<p>The Washington State Apprenticeship and Training Council's (WSATC) Electrical Subcommittee is comprised of representatives from all approved electrical programs in Washington State. They are represented by two (2) elected chairs who deliver the report quarterly to the WSATC. This is not an L&I committee.</p> <p>Under WAC 296-05-011, objections may be entered by a competitor.</p>
<p>Comment #33</p>	<p>Response #33</p>
<p>The difficulty that I see in this is, you know, like I deal with a large number of contractors, union, non-union, specialty contractors as well. And, you know, the question I have is: Can we substantiate if there's a difference in the number of write-ups between someone who has gone through an apprenticeship program and perhaps somebody that has not?</p> <p>And when you -- what I find in the type of work that I do is that if you make a pathway difficult -- very difficult or impossible to do, then people tend to go into non-compliance. And so, you know, let's say you have an owner of a small company and</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>No data exists to substantiate if there's a difference in the number of write-ups between someone who has gone through an apprenticeship program and somebody who has not.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or</p>

that small company, he decides to hire an O1 journeyman electrician but he has a specialty license himself. You know, as a owner of a small business with maybe just a few employees, he wants -- he has to still work with the tools, do the estimating, purchase product.

And it seems to me that it would be just about impossible for that person to really advance his company because he would have to go through the apprenticeship program for him to get licensed. And so typically, you know, like he couldn't even really work alongside of the O1 master electrician that he hired for his company to do the same work to even learn it without going off and being hired by somebody else through an apprenticeship program.

So what I find is that, you know, if you require things let's say plans for minor things like a hundred amp service, then oftentimes they'll just change what they apply on the permit. Right? They'll have -- or they'll go out and they'll have somebody that's qualified working, and then they'll have somebody unqualified working but he has no pathway to get there.

So they -- fundamentally I can understand why people are going to feel that it would be unfair. So I -- my conviction is that we need to be able to accommodate everyone that's in the industry and

equivalent apprenticeship program approved by the department according to RCW [19.28.161](#)(2)(a)(i), effective July 1, 2023.

Starting on that date, there is not a way to gain more O1 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

Specialty electricians do not lose credit for their specialty experience. 2018's SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in O1 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the O1 exam once they fulfilled their program's educational requirements and gained 4,000 hours of industrial commercial experience.

Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.

<p>allow those with experience in the industry, you know, to be able to go from a specialty to another specialty or from a specialty to an 01.</p> <p>And if there was a fundamental difference in the quality of work between those in the apprenticeship program and those not, then -- and the number of write-ups -- you have three times the number of write-ups for somebody, then you've got a justification for saying everyone needs to go through an apprenticeship program.</p> <p>But I think in looking at it in retrospect now, if you were going to set a date, then like those that already had their apprenticeship card by the date should be able to complete their trainee, you know, under the current rules because they've already got this training card. You don't want to cut these people off. You know. If you're going to start an apprenticeship program, you want to start from a certain date those that don't have it and those that enter in. It just seems to make more sense to me.</p>	
<p>Comment #34</p>	<p>Response #34</p>
<p>I just wanted to address the comment that I heard from Rob about who is developing this rulemaking for non-union shops. And he said that it was basically CITC and IBEW. And again, I'm not quite sure why IBEW is involved in this conversation at all because it does not impact them at all. They have the apprenticeship programs that they have.</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p>

<p>They have used this rule to develop like seven more apprenticeship training programs, which is probably using government money, if I know government. And, in fact, lesser small shops have not been able to get their apprenticeship programs up and running.</p> <p>When I spoke with the apprenticeship committee, I called them as soon as this rulemaking came out and said, "Well, we want to train in our own shop because we live in Olympia and driving to Bellevue is difficult."</p> <p>And they essentially told me that unfortunately we would not be allowed to train in our own shop because we don't do industrial electrical and we don't do enough commercial electrical.</p> <p>And my response back to that was, "Well, we hired a three and a half year apprentice from a union shop. And when he came to work for us, he didn't even know how to wire a three-way."</p> <p>So we're like, "Our guys dance circles around these guys because we spend two to three hours every week training our guys on the code and electrical."</p> <p>And the apprenticeship guy told me, "Unfortunately because you don't do enough industrial and local security, fire alarms, you cannot have an apprenticeship program."</p>	<p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023. The law provides no authority to make any other provisions.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Starting on that date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p> <p>Specialty electricians do not lose credit for their specialty experience. 2018's SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in 01 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they</p>
--	---

And I'm like, "But we're a small shop. We're never going to do industrial electrical. So basically you're telling me that I can never ever hire a kid out of high school and give him an opportunity to become a commercial electrician. You are telling me that because I don't do industrial, that they're going to have to go and work for some other shop that does industrial work in order to get a commercial license. That makes no sense."

So I ask again why the union has any input into this development of this training program that is specifically separated out from the union. And all of the people that should be on these committees should be companies that are non-union. Instead you're asking us to apply to an apprenticeship committee, which is made up of 90 percent union shops or union representatives or their brother is the union -- owns the union business. And there's not an apprenticeship program set up for non-union shops.

If you want to have something that they have to apply to -- like Dmytrii said, he couldn't even get into an apprenticeship program. I'm like that makes absolutely no sense. And if a guys has a two-year license -- when I talked to L & I about my guys that have worked for me for two years and have got their O2 license, "Can they use their O2 license to proceed on to get a commercial license

fulfilled their program's educational requirements and gained 4,000 hours of industrial/commercial experience.

Electrical Section outreach efforts:

- Mailed over 28,000 letters to trainees, master electricians and electrical administrators assigned to electrical contractors in June 2018, explaining new apprenticeship requirements taking effect in 2023 after passage of SSB 6126.
- Since August 2019, over 43,000 automated letters mailed to trainees informing them of upcoming apprenticeship requirements. Every time a worker becomes a trainee or renews their training certificate, a letter also goes out to inform them of the change in 2023. The trainee certificate is valid for two (2) years.
- Updated webpages for electrical trainees and electricians with information about new apprenticeship requirements. Established www.lni.wa.gov/ElectricalApprenticeship to inform contractors and trainees. Web traffic is high, with roughly 99% of all new trainees applying online. About 95% of all renewals were done online.
- Began distributing informational 4"x6" cards and posting on jobsites beginning in June 2019. L&I electrical inspectors have so far distributed about 20,000 to date.
- Published multiple articles (as many as 16 since 2018) in the monthly Electrical Currents newsletter that reaches roughly 11,000 subscribers.

Learn more about requirements and available programs at:

www.lni.wa.gov/ElectricalApprenticeship.

The Washington State Apprenticeship and Training Council's (WSATC) Electrical Subcommittee is comprised of representatives from all approved electrical programs in Washington State. They are represented by two (2) elected chairs who deliver the report quarterly to the WSATC. This is not an L&I committee.

<p>by entering an apprenticeship program?" What they told me was, "Well, they'll have to apply and they may be denied because they don't have enough education hours."</p> <p>That makes no sense. If you have an 02 license or an 06 license or any specialty license, you should be allowed to get into any apprenticeship program with your license. You shouldn't have to go, "Well, I worked for this small shop in Tulalip and I couldn't drive however far it is to get to school" or "I'm in Omak" or "I'm in Toledo, Washington, and I -- unfortunately my shop didn't offer an apprenticeship program. They only offered a trainee program. And now I have an 02 license and that's all I can ever have." That makes absolutely no sense.</p> <p>This law is not ready for implementation. I want my guys to be educated. I want my guys to know what they're doing. Because you know what? I don't want them to get hurt. And I want customers that are happy with my guys and I want work that's done in a well -- in a way that represents what we want to have in our company.</p> <p>If you check our company out, we have almost 600 five star Google reviews because we train our guys to do good work. We very seldom have corrections. If you look at our record at L & I, there are hardly any corrections because we educate our</p>	<p>Since 2018, there have been six (6) new 01 electrical apprenticeship programs. None are on record to be affiliated with any organized labor partner.</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices. As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well.</p> <p>WAC 296-05-015(11): A provision for granting of advanced standing or credit for demonstrated competency, acquired experience, training, education, or skills in or related to the occupation and:</p> <ul style="list-style-type: none"> (a) In licensed trades regulated by electrical, plumbing, and elevator programs at the department, apprenticeship sponsors may give advanced credit or grant hours to apprentices only up to the hours that have been approved by the appropriate licensing entity prior to the sponsor granting credit to the registered apprentice. (b) All apprenticeship programs need to ensure that a fair and equitable process is applied to apprentices seeking advanced standing or credit. <p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1)(c), effective July 1, 2023).</p> <p>The WSATC has approved the following requirement after input from Industry Stakeholder Apprenticeship Programs:</p>
---	---

guys.· But that doesn't seem to matter with this law. It's just like, "Well, you might as well just not do anything because it doesn't really care."

And then regarding the gentleman who talked about losing hours, L & I needs to be concentrating their energy on the underground work and contractors that are working out of ratio and that are allowed to continue working out of ratio and keep their businesses open. I look at Varsity Electric and Mr. Electric here in Olympia and you look at their records, and they have trained all these guys that they were out of ratio so they lost their hours.· They lost 2,000 hours. That's a whole year of their lives.· If you paid a university and you went to university for a whole year and then you said, "Oh, well we're not going to give you any credit for those because your university didn't apply -- do things right," that's a whole year of a guy's life gone. He'll never get it back.· Now he has to work for another 2,000 hours in some other shop that he's hoping will hire him and train him right.

And I understand the apprenticeship program will help with that. But it doesn't -- it's not ready yet. And there's no -- CITC and IBEW are -- got their hands in each other's pockets. Do you have any idea how much money CITC is going to earn by this new program? Millions and millions and millions of dollars. Of course they're invested in it because

General Electrician (01)

The 144 hours of Related Supplemental Instruction (RSI) for every 2,000 hours of on the job training identified shall be 144 hours/2,000 hours on-the-job training (OJT) of competent instructor led classroom instruction ("must" include lab or hands-on instruction). This requirement includes a minimum of 720 RSI hours over the term of apprenticeship under the same conditions.

On-line would not be excluded as a delivery method, but could only be offered for hours over the 144 annual minimum/720 cumulative total. (Per [Electrical Minimum Guideline Standards](#))

For Apprenticeship Equal Employment Opportunity Requirements, please see WAC [296-05-400](#).

<p>they are going to benefit so incredibly hugely.· Because if you only have the union or CITC and that is your only option and you can't get your own shop as an apprenticeship program, I – of course they want it.</p> <p>So you need to quit talking to them and you need to start listening to all of the independent, small non-union shops. And I want to know how many non-union small shops L & I has spoken with about this issue. And I would like that in an email sent to all of us that are invested in this issue that shows how many -- how L & I reached out to small, independent electrical contractors, how many companies that you spoke with when you were implementing this new ruling and how you were going to address this new ruling. I want to know how many independent contractors you guys spoke with so I can call them and talk to them and find out what information they gave you.</p>	
<p>Comment #35</p>	<p>Response #35</p>
<p>I recently spoke with Local 48 union to see what it would take to get into a training program. And I asked about the 02's or even my 01.</p> <p>I said, "So what would it take and what would happen to their hours?"</p> <p>And he said, "We wouldn't recognize any of your hours, period. You start over."</p>	<p>Thank you for sharing your observations. Because Local 48 is an Oregon Apprenticeship, Washington laws do not apply to them.</p> <p>Substitute Senate Bill 6126 (2018) includes a special provision for all 4,000 hour specialty electricians who become registered apprentices in Washington 01 journey level apprenticeship programs. The provision requires Washington apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they fulfilled their program’s educational requirements and gained 4,000 hours of industrial commercial experience.</p>

<p>And so that's the point I want to make to all you guys. If you talk to the union, none of your hours will count.</p>	
<p>Comment #36</p>	<p>Response #36</p>
<p>I'd like to say that I've done a lot of homework when it comes to this. And I sat in with the owner of Haggard Electric, in multiple meetings with the union. And they've been coming after us for four years now. They're trying to get us to convert to union. Obviously we haven't done it for a reason.</p> <p>We've had multiple guys leave, go to the union and come back. They don't like it. They're not learning like they're supposed to be. And we're not -- we don't treat them as a number. We treat them as family. We help them learn. And we realize how much this will affect them financially and how much they're going to lose from this.</p> <p>I mean they put all their work into this. We see them more than we see our families. And they're out there in the freezing cold, in the heat, sweating, working hard. It is hard to pull wire for 01's. It is hard to sit in a unit while it's cold or while it's hot and drill and pull wire and do everything that you need to do to get these buildings up and ready for other people to move in. And here we are taking that away from them and allowing CITC and the union to win out of this.</p> <p>Has anybody done their homework to show how</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>The L&I licensing system does not collect information as to whether or not contractors are open-shops or party to a union collective bargaining agreement.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Under authority provided by RCW 19.28.195, the adopted rule implements temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023. The law provides no authority to make any other provisions. Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Starting on that date, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or</p>

many non-union merit shops that are out there? I have printed a packet of how many non-union shops are out there. There is no way that CITC or the union can manage every one of those people that want to get their 01. It is not fair that they're going to lose hours when they've busted their butts to get where they are.

We have kids coming right out of high school, starting. I know my son did. And he's almost ready to test out for his 02. So here we are just taking everything from them. Not only are they going to lose pay, which puts a hardship on them and their family, we're making them go drive to a class that's nowhere near where they live. So that's another hardship. They have to pay for their fuel. And we all know that fuel is not cheap right now.

There's some of them that just started and they're trying to make it. And you're just going to knock them right back down to start all over. There's guys with 1,900 hours, almost there. And if they want to become an 01, they have to go to an apprenticeship program and then apply. And you have them sit for three months to figure out where they're at in their education to determine where they're going to stand on that list for hire.

We, as a merit shop at Haggard, we don't want to have to wait for a guy that we want to hire. We want to be able to hire them, get them in, let them

equivalent apprenticeship program approved by the department according to RCW [19.28.161](#)(2)(a)(i), effective July 1, 2023.

Starting on that date, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.

Specialty electricians do not lose credit for their specialty experience. 2018's SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in 01 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they fulfilled their program's educational requirements and gained 4,000 hours of industrial/commercial experience.

Washington State was approved by the United States Department of Labor (DOL) to operate our State Apprenticeship in 1939. Labor & Industries along with the Washington State Apprenticeship and Training Council (WSATC) has been successfully operating a registered apprenticeship system which includes electrical apprenticeships. Washington State is currently still recognized and approved by the DOL as meeting all federal rules and guidelines for registered apprenticeship.

Requirements for starting your own apprenticeship program can be found in WAC [296-05-009](#).

Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices. As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well. Electrical apprenticeship programs are exploring

<p>work.</p> <p>This country right now, there's people that are sitting at home because they want to. We have guys that want to work. And they're not going to be able to because of this, because of this rulemaking. And I just think it's unfair. It's not fair that now they're going to be away from their families even more.</p> <p>I brought in a trainer, and every other weekend we're doing CEU class. We do hands-on training where they come into the shop. We've made mock unit. They come and they wire it. And if they mess up, we correct it and we teach them.</p> <p>So I just think it's wrong that you have put in your faith to the union and CITC to make this ruling and you're passing it on just what they're saying. And they're the ones that are going to win out of this. People are going to go -- have to go union or go CITC.</p> <p>CITC can't manage everybody now. You can't even get into their program. So what are we going to do with the companies that can't get into CITC and don't want to go union? How are we going to manage that? That's my question for you guys. And how do you think it's fair. If you were out there --</p>	<p>Supportive Service resources to help assist rural apprentices in their travel costs associated with attending Related Supplemental Instruction (RSI).</p> <p>WAC 296-05-015(11): A provision for granting of advanced standing or credit for demonstrated competency, acquired experience, training, education, or skills in or related to the occupation and:</p> <ul style="list-style-type: none"> (a) In licensed trades regulated by electrical, plumbing, and elevator programs at the department, apprenticeship sponsors may give advanced credit or grant hours to apprentices only up to the hours that have been approved by the appropriate licensing entity prior to the sponsor granting credit to the registered apprentice. (b) All apprenticeship programs need to ensure that a fair and equitable process is applied to apprentices seeking advanced standing or credit. <p>For specialty electrician certificate holders in 02, 03, 04, 06, 06A, and 07 specialties, a registered 01 electrical apprenticeship program is required to grant 4,000 hours for previous experience. This is based on L&I review of state law (RCW 19.28.191(1)(c), effective July 1, 2023).</p>
---	---

<p>Because I've done it. I'm an apprentice myself, or I should say a trainee, and I've done it to learn what my guys are doing. Because I'm their safety director, and I can't keep them safe if I don't know what they do. So I've joined. And I have my hours in. And in order for me to get my 01, not only I have to continue my education for safety, now I have to continue my education weekly to get my 01. And it's just -- it's kind of degrading to do that to somebody. And if you were out there doing it yourself, you would feel highly upset about this. Because I know I am and I know my guys are too. And I just think it's unfair.</p>	
<p>Comment #37</p>	<p>Response #37</p>
<p>One thing I wanted to mention is as a small contractor, when you have minimal amount of people in your company, you can't even reach the minimum qualifications for even starting or even trying to apply for your own apprenticeship program because the minimum committee quantities you have to have for licenses and people so -- in them, which limits basically any company who doesn't have at least two 01 licenses and two company members who want to be part of this committee. Again, another limiting factor for small business who may want to train their own people, who should have an opportunity to train their own people.</p> <p>I really believe that there should be no issues with any trainees losing any hours up to July 1st. I have</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>Trainees who are not registered in an apprenticeship program cannot continue to do work limited to 01 electricians after July 1, 2023.</p> <p>Beginning July 1, 2023, if not working in a specialty or enrolled in an approved training school program, trainees doing work limited to 01 electricians must be registered in an apprenticeship program approved under chapter 49.04 RCW or equivalent apprenticeship program approved by the department according to RCW 19.28.161(2)(a)(i), effective July 1, 2023.</p> <p>Starting July 1 ,2023, there is not a way to gain more 01 hours without being a registered apprentice. L&I has no authority to modify this law or delay the date when the law becomes effective.</p>

mentioned this comment months ago when there were some open comments on the floor. And I really believe that all trainees registered in the state prior to July 1st, 2023 should be able to continue on as they signed up, as the program they signed up into, which is the standard and tried and true trainee path. This would solve all transitional issues for -- not all -- there's a lot of issues I guess -- but this would help buffer training facility needs because only apprentices starting from July 1st forward or trainees being registered July 4th forward would now become apprentices and become part of the apprenticeship program one at a time rather than packing the entire state in all at once when there's no facility. We can all see this probably blowing up in our face. And so I really think no hours should be lost. All existing trainees should be able to continue on as normal.

And I would like to second that I would love to see info on L & I's outreach, as was mentioned by Winona, to see how many independent contractors were contacted or union contractors, any contractors in the state with input on this bill or on how this should be implemented or how it's going to affect our companies and our trainees and our customers, clients, or industry in general because I don't think there's been any. I would love to see it and how I would have missed that because I'm a pretty attentive person.

Specialty electricians do not lose credit for their specialty experience. 2018's SSB 6126 included a special provision for all 4,000 hour specialty electricians who become registered apprentices in 01 programs. The provision requires apprenticeships to credit those apprentices with 4,000 specialty hours toward completion of their program. Apprentices can qualify for the 01 exam once they fulfilled their program's educational requirements and gained 4,000 hours of industrial commercial experience.

Except for experience in 2,000 hour specialties, apprenticeships may also grant hours of experience on file at L&I electrical licensing. Anyone can view hours at www.lni.wa.gov/Verify.

Learn more about requirements for apprenticeship and available programs at: www.lni.wa.gov/ElectricalApprenticeship.

Again, I think a delay is absolutely necessary.	
Comment #38	Response #38
<p>I heard a lot of good comments and passionate comments from people. Wanted to let people know that unfortunately this forum is not really going to get to the results that you're looking for. This forum was designed to take comments on the rules that have been created by L & I. So you need to reach out to your legislators and reach out to your local representatives, whether it be Washington State Electrical Contractors Association, ABC, or some other groups that are actually actively working on trying to deal with 6126.</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>
Comment #39	Response #39
<p>I just want to say that electricians are really hard to come by these days, both journeyman and apprentices, because the younger generations aren't interested in the trades and the older generations are retiring out. This rule will destroy the electrical industry and raise costs for everybody, from the employers to the customers.</p> <p>I think that on-the-job training is essential because it's real life application. Some people are hands-on learners. That doesn't make them bad electricians.</p> <p>This is America, land of the free, not land of union control. Providing more opportunity is the way that this rule is worded. It's not more. It's limiting opportunity. Added in as an option instead of</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>

<p>substitution, that would provide more opportunity and not limit it and put such huge burden on employers and trainees.</p> <p>Non-union shops are non-union for a reason. So why would the union have any control in implementing a rule that affects them? Not saying that the union is bad, just that it's not for everybody.</p>	
<p>Comment #40</p>	<p>Response #40</p>
<p>A gentleman from Labor & Industries came on and spoke. And I'm addressing more the people that are listening to this meeting than the actual people in charge of the meeting.</p> <p>I don't know if this video is going to be sent out to all attendees. He advised us all to talk to our Representatives at parliament. And I would suggest that all of you send this video when you get your copy to them with your opinions so that -- apparently we are needing to address some of these issues somewhere else instead of this.</p> <p>I went to the Senate hearings when they tried to do an upgrade last year. And the union was very strong at that meeting and their input was very much considered. And none of us small contractors were there -- there was two small electrical contractors that spoke at that Senate hearing.</p> <p>So I suggest that all of us reach out to our</p>	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 in 2018.</p> <p>A transcript of the meeting is available upon request. The hearing was not video recorded.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p>

<p>Representatives and make sure you're getting in front of them. Because apparently they're the ones making the decisions here.</p>	
<p>Comment #41</p>	<p>Response #41</p>
<p>CR-102 is a “fix it” bill for SSB 6126 which is legislation that shouldn’t be implemented. It is deeply concerning that SSB 6126 is flawed and for the following reasons will lead to the demise of many small electrical contractors.</p> <ol style="list-style-type: none"> 1. Too expensive for small electrical contractors to join an existing WA registered apprenticeship, (sponsor). 2. There are not enough sponsors in Washington. 3. The schools that are available through the sponsor are not close enough for electrical contractors on the eastern side of the state. (The closest for Clarkston will be CITC which is 2.5 hours away). 4. Small electrical contractors have already been hit hard with the state’s pandemic lockdown mandates, which has caused shortages in the labor force, shortages of materials and extended lead times in getting materials. Lead times are from six weeks to a year depending on the product. Now SSB 6126 will continue the struggle to 	<p>Thank you for your testimony related to the amendments proposed to WAC 296-46B-945 to enact temporary provisions allowed by RCW 19.28.195, a new section created when the legislature passed Substitute Senate Bill 6126 (SSB 6126) in 2018.</p> <p>L&I has no authority to repeal or modify laws requiring apprenticeship enacted by the legislature.</p> <p>The adopted rule only pertains to temporary provisions to allow candidates to qualify for the 01 general journey level examination without first completing a registered apprenticeship program. We have determined the adopted rule poses no financial impact on individuals seeking journey level examination eligibility or their employers; rather the adopted rule reduces costs by providing alternative pathways.</p> <p>Under authority provided by RCW 19.28.195, the adopted amendments to the rule implement temporary exceptions to apprenticeship completion requirements for candidates seeking to qualify for the 01 general journey level examination beginning on July 1, 2023. The law provides no authority to make any other provisions.</p> <p>Learn more about requirements and available programs at: www.lni.wa.gov/ElectricalApprenticeship.</p> <p>Washington State was approved by the United States Department of Labor (DOL) to operate our State Apprenticeship in 1939. Labor & Industries along with the Washington State Apprenticeship and Training Council (WSATC) has been successfully operating a registered apprenticeship system which includes electrical</p>

<p>stay in business and ultimately lead to our demise.</p> <p>Instead of focusing on proposals that will fix SSB 6126, one needs to propose that SSB 6126 not be implemented.</p>	<p>apprenticeships. Washington State is currently still recognized and approved by the DOL as meeting all federal rules and guidelines for registered apprenticeship.</p> <p>Requirements for starting your own apprenticeship program can be found in WAC 296-05-009.</p> <p>Existing apprenticeship programs are limited with the number of job openings the Training Agents (employers) have to employ apprentices. The more employers that sign on as training agents, the more job opportunities and capacity for apprentices.</p> <p>As the demand increases, apprenticeship programs will be expanding training facilities locations to meet apprentices needs. Programs are exploring creative options to class schedules as well. Electrical apprenticeship programs are exploring Supportive Service resources to help assist rural apprentices in their travel costs associated with attending Related Supplemental Instruction (RSI).</p> <p>Currently there are eleven (11) registered 01 electrical programs approved in the state of Washington.</p>
---	---