



October 12th, 2023

Dear Members of the Washington State Apprenticeship Training Council:

During the last session, legislators listened to the challenge faced by both trainees and employers as they sought to comply with 2023 deadline for the 01-journey level electrical contractor apprenticeship requirement established by SSB 6126 in 2018. One primary concern was the potential loss of years of on-the-job training credit for existing trainees, who would have to start over in their progress toward a journey level wage, and the equaling compelling need to prevent a shortage of qualified workers.

As a result, we passed the compromise measure ESSB 5320 which allows, for a temporary term, a dual pathway to reach a 01 Electrical certification:

- Existing trainees with 3,000 hours may continue towards their 01 certification (grandfathered trainees), and
- New apprentices can enroll in 01 electrical apprenticeship Programs.

This accomplishes a goal we all share of expanding the opportunities for workers to attain a living wage profession. We understand that an increasing number of employers are seeking approval of apprenticeship programs, another goal we all share. Some of these employers also employ grandfathered trainees. This scenario may lead to having a mix of apprentices and trainees in the same workforce for a temporary time.

Now we are learning that due to an interpretation of an existing administrative regulation, employers are advised that apprentices and trainees cannot work for the same company. This interpretation means employers, particularly small employers and those in rural locations, face a bad choice: if a company sponsors an apprentice program it means firing trainees, or if a company keeps trainees, it foregoes employing apprentices. Either option narrows the opportunity for new workers, when we should be expanding.

We were pleased when the WSATC Board Chair advised us it was appropriate for individual apprenticeship programs to submit a formal variance request to the WSATC, whereby individual programs with both trainees and apprentices can request that the WSATC grant program-specific variances to the rule prohibiting employers from working both trainees and Apprentices, and that the Board encouraged any individual programs at issue here to seek that relief. (8/31/23 *WSACT Letter*).

We urge the Council to carefully consider these situations and approve the necessary variances, as encouraged by Chair Riker. This will carry out the seamless implementation of both 6126 and 5320 for all workers. Denying the variance hurts the very employees that the legislature was intending to help. We firmly believe that enabling companies to employ both trainees and apprentices over the next three

years without disrupting ongoing projects or hindering employment and training opportunities is the optimal solution for the state.

We ask the Council to exercise its authority to approve the variances which will achieve this objective at the upcoming October 19th Council meeting. We kindly request you to keep us informed about your progress in this matter.

Sincerely,



Representative Mike Chapman
24th Legislative District



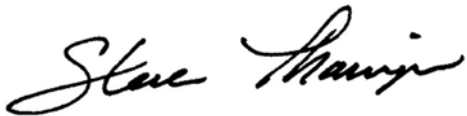
Representative Suzanne Schmidt
4th Legislative District



Representative Alex Ramel
40th Legislative District



Representative Amy Walen
48th Legislative District



Representative Steve Tharinger
24th Legislative District



Senator Curtis King
14th Legislative District



Senator Sharon Shewmake
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