

# Alaska State Legislature



January 9, 2020

Commissioner Tamika Ledbetter  
Alaska Department of Labor and Workforce Development  
P.O. Box 111149  
Juneau, Alaska 99811

Transmitted via email

Re: Proposed student trainee certificate of fitness regulations

Dear Commissioner Ledbetter:

We members of the Alaska State Senate have concerns about the creation of a new student trainee certificate of fitness program that was part of a December 4, 2019, proposal by the Alaska Department of Labor and Workforce Development to change regulations in Title 8 of the Alaska Administrative Code relating to the uniform plumbing code, the safety code for elevators and escalators, the boiler and pressure vessel code, and API pressure relief testing valve standards.

The possibility of having a new student trainee certificate of fitness program has generated a myriad of questions from our constituents as well as mechanical and electrical contractors, both union and non-union, as to what this plan is trying to accomplish.

We respectfully request that the department break its December 4, 2019, proposal into two regulatory packages: one dealing with code changes and the other focused solely on a standalone student trainee certificate of fitness program. We ask that your agency then start a new, 30-day comment period on the latter.

We also encourage the department to hold stakeholder meetings and educate legislators and the public about the proposed trainee program.

Finally, we urge you to present this proposal to the Alaska Workforce Investment Board and ask that panel to weigh in on it.

Thank you.

Handwritten signature of Senator Click Bishop in black ink.

Senator Click Bishop

Handwritten signature of Senator John Coghill in black ink.

Senator John Coghill

Handwritten signature of Senator Cathy Giessel in black ink.

Senator Cathy Giessel

Handwritten signature of Senator Bert Stedman in blue ink.

Senator Bert Stedman

Handwritten signature of Senator Gary Stevens in blue ink.

Senator Gary Stevens

Handwritten signature of Senator Natasha von Imhof in black ink.

Senator Natasha von Imhof

cc: Suzanne Cunningham, Legislative Director, Office of the Governor  
Cathy Muñoz, Deputy Commissioner, Alaska Department of Labor and Workforce Development  
Becky Weimer, Regulations Specialist, Alaska Labor Standards and Safety Division

# ALASKA STATE LEGISLATURE



## House of Representatives

January 13, 2020

Dr. Tamika L. Ledbetter, Commissioner  
Alaska Department of Labor and Workforce Development  
P.O. Box 11149  
Juneau, AK 99811

Re: Notice of Proposed Regulations – Mechanical Inspection

Dear Commissioner Ledbetter,

We are writing to express our strong opposition to changes in plumbing and electrical regulations that would eliminate apprenticeship utilization and double the ratio of apprentices to journeyworkers. These regulations would significantly expand the risk of on-the-job deaths and serious injuries while undermining the primary workforce development system for the industry.

Registered Apprenticeship has long been the cornerstone of training in the electrical and plumbing industries. With a 1:1 ratio of apprentices to journeyworkers, apprenticeship training dramatically lowered death rates while improving productivity and ensuring that companies benefit from a consistent pipeline of workers with on-the-job training. As the department itself has documented, apprenticeship has an unparalleled record of providing a skilled workforce, which means more jobs for Alaska residents and more skilled workers available for Alaska business owners.

The proposed regulations would be devastating for multiple reasons. First, they eliminate the "apprenticeship" requirement and would replace it with a nebulous "trainee" standard. Second, the proposed regulations would double the number of trainees who could be supervised by a journeyworker. For occupations where a single error can result in death--not just for individual workers but others on a job site--these changes present a clear and present danger to the life and safety of Alaska workers, and must be discarded.

It is important to note that joint Registered Apprenticeship programs invest approximately \$50,000 per year over a four-to-six- year period to train electricians and plumbers. The proposed regulations would substantially undercut this system, and would not only endanger Alaskans but also contribute to massive disinvestment from our workforce development system. We only have a high-quality apprenticeship system for these occupations because it is funded by industry and employees, with professional instructors, classrooms, and training facilities. Eliminating

apprenticeship requirements and changing journeyworker-to-trainee ratios would allow substandard firms to consistently underbid firms that invest in adequate training.

Finally, these regulations would tear down an important career ladder for our military veterans. Both electrical and plumbing apprenticeships have well-established programs (such as VIP: Veterans in Piping) for transitioning service members entering the trades. Gutting apprenticeship would mean more veterans would leave Alaska due to lack of transitions into post-service employment.

We want good jobs with decent pay and excellent training for high standard, quality work and safety. We urge you to withdraw these proposed regulations and stand with Alaska businesses and workers for whom the apprenticeship system is the foundation of workforce development.

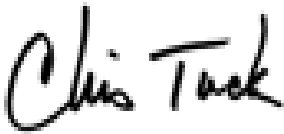
Thank you,



Representative Zack Fields



Representative Kelly Merrick



Representative Chris Tuck



Representative Gabrielle LeDoux



Representative Jonathan Kreiss-Tomkins



Representative Dan Ortiz



Representative Matt Claman



Representative Grier Hopkins



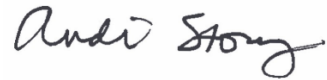
Representative Ivy Spohnholz



Representative Andy Josephson



Representative Sara Hannan



Representative Andi Story



Representative Laddie Shaw



Representative Louise Stutes



Representative Harriet Drummond



Senator Elvi Gray-Jackson



Senator Tom Begich



Senator Scott Kawasaki