



January 16, 2020

Representative Zack Fields
Alaska State Capital #511
Juneau, AK 99801

Re: Notice of Proposed Regulations – Mechanical Inspection

Dear Representative Field,

Thank you for your letter dated January 13, 2020, regarding adjustments to the certificate of fitness standards for plumbing and electrical trainees. I would like to take this opportunity to address several items presented in your letter. If, after reading this response, you have additional questions, please don't hesitate to reach out to me. As Alaskans, we share the same goals of a well-trained workforce and expanded opportunities for the people that we serve.

First, I would like to clarify that the proposed regulations do not eliminate apprentice utilization. The proposed regulations create an alternate pathway along with registered apprenticeship for Alaskans to gain the necessary experience to become a journeyman electrician or plumber.

Current regulations limit training exclusively to registered apprenticeship. That means an Alaskan electrician or plumber who wants to train their son or daughter to join the family plumbing or electrical business as a trade worker, can only do so through a federally-approved apprentice training program. It also means that rural Alaskans have fewer opportunities to perform work as a trainee on a project in rural Alaska, because registered apprentices are typically brought in from larger communities. The proposed regulations are designed to expand training opportunities in these types of scenarios.

By allowing an alternative pathway to receive hands-on work experience in the plumbing or electrical trade, the regulations propose to increase opportunity for Alaskans. This will not eliminate the apprentice requirement as asserted in the January 13 letter. The proposed regulations will continue to require 8,000 hours of registered apprenticeship in order to qualify to take the examination to obtain a journeyman license. This will maintain registered apprenticeship as the primary training model used in the construction industry. The alternative pathway proposed in the regulations requires 12,000 hours of experience in order to qualify to take the journeyman exam.

It is noteworthy that current regulations create increased restrictions on Alaskans that do not exist for electrical or plumbing workers coming from most other states. For example, current regulations would allow an individual to come to Alaska and test for journeyman status after documenting 8,000 hours of legally obtained electrical experience in a state like Florida where registered apprenticeship is not mandated. The proposed regulations will put Alaskans on a level playing field with individuals

in states where registered apprenticeship is not legally required to obtain experience performing work subject to code. The proposed regulations require 12,000 hours of “legally obtained” work experience outside of registered apprenticeship regardless of whether the experience was obtained in Alaska or in another jurisdiction.


Your letter purports that the proposed regulations will increase workplace safety hazards but does not discuss this assertion further. To evaluate the impact on workplace safety, it is important to note that prior to 2006, a trainee in Alaska could qualify to take the journeyman plumber or electrical exam with 8,000 hours of documented work experience as an alternate pathway to registered apprenticeship. The Alaska Occupational Safety and Health Section evaluated workplace accidents in the electrical industry prior to and following the change in 2006 that restricted training exclusively to registered apprenticeship. In the ten years prior to 2006, AKOSH investigated zero workplace fatalities in the electrical industry. In the ten years after 2006, AKOSH investigated three fatalities in the electrical industry and one victim was a registered electrical apprentice. Due to data limitations during this time frame, Workers’ Compensation data is more limited, so the department evaluated the period from 1999 through 2013. From 1999 through 2006, Workers’ Compensation records identified 10 lost time incidents in the electrical industry compared to 76 lost time injuries from 2007 through 2013. The evidence does not support the contention that mandatory registered apprenticeship improved workplace safety in Alaska after 2006.

Perhaps the greatest falsehood in your letter is that the proposed regulations would “tear down an important career ladder for our military veterans.” As previously stated, the current apprenticeship model will remain in effect as a pathway to obtaining journeyman status as an electrician or plumber and we are hopeful that the Plumber’s and Pipefitter’s Union and the International Brotherhood of Electrical Workers will continue to provide opportunities for veterans to get into competitive union apprenticeship training programs. The proposed regulations are designed to provide even more opportunities for veterans and all Alaskans by establishing another pathway for employers to provide training and for workers to legally obtain experience in Alaska’s plumbing and electrical trade.

The department has decided not to move forward with the proposed regulations to establish a student trainee certificate of fitness at this time. This aspect of the proposal would have allowed state, federal, or school district educational programs to include hands-on work subject to the electrical or plumbing code under the competent supervision of a journeyman instructor. The department intends to get additional input from training providers and incorporate public discussions related to this aspect of the proposal at an upcoming meeting of the Alaska Workforce Investment Board.

The Department of Labor and Workforce Development is committed to improving training opportunities for Alaskans to be employed in good-paying jobs and to meeting industry needs for a local, qualified workforce. I appreciate the opportunity to respond to your letter and hope that you will provide these answers to concerned constituents who may reach out to you regarding the enhanced opportunities for workforce and training in Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "Tamika L. Ledbetter". The signature is fluid and cursive, with a large initial "T" and "L".

Dr. Tamika L. Ledbetter
Commissioner