

Submission to Sunset Commission

Submitter Name: Gail Davalos

Organization: Workforce Network, Inc. (a 501c3 non profit dedicated to workforce development)

Authorized Representative: Gail Davalos

Submission: Request for Amendment of TDLR Electrician Licensing Rule

To address the state-wide shortage of licensed electricians and to enhance public safety, we recommend a Rule Amendment to TDLR's Electricians Code (Chapter 1305) to allow the Department to **credit an applicant with up to 1,000 hours of work experience required to sit for a licensing exam if the applicant has completed an approved apprenticeship training program applicable to the level of license requested.** Currently, the Electrician Licensing Rules (Subsection D) require a person to apprentice under a Master Electrician for a set number of hours respective to each type of license.¹ Secondary and/or post-secondary education that earns a student or worker an industry-recognized credential for competency in electrician skills and knowledge cannot be considered under the current Rule's License Requirements.

This amendment would serve multiple purposes:

1. Improve public safety through higher levels of skill and knowledge of licensed Electricians. Data indicate that standardized apprenticeship training programs which include classroom and hands-on instruction improve the skills and knowledge of apprentices when combined with on-the-job training under a Master.²
2. Offer incentives of an accelerated path to licensing for Electrician Apprentices that earn an industry-recognized credential through an approved Apprenticeship Training Program.
3. Help address the shortage of licensed Electricians in Texas by attracting new entrants to the trades, especially young people looking for swift upward mobility. The trades face a significant perception problem. Young people looking for work view construction jobs as dirty and difficult, with little opportunity for upward mobility. This is tied to shifts in the jobs that society appears to value—jobs without a college degree are perceived as lesser.³

¹ For example, an Apprentice must work under a Master Electrician 4000 hours or approximately two years to qualify to sit for the Residential Wireman licensing exam. For Journeyman level and most other lower-level licensing, 8000 hours or about four years is required to qualify for examination.

² Such data includes exam pass rates of apprentices in formal training programs compared to apprentices who clock on-the-job hours only. The pass rate for all levels of examination averages 28.7%. The unions and independent Electrician associations claim the pass rate of their graduates' averages 90% - 95%. Also, Master Electricians who employ both types of apprentices (those in DOL-approved training programs and those who are not) are a source of anecdotal feedback about the marked improvement of skills, knowledge, and productivity of apprentices in a standardized apprenticeship training program.

³ Building Talent Foundation research, *Who Will Build the Homes of the Future? Analyzing the Labor Shortage in Residential Construction*, 2019

By comparison, the Texas State Board of Plumbing Examiners, already has the proposed language in their Rules. The Plumbing Board may credit an applicant with up to 1,000 hours of work experience required to sit for a licensing exam if the applicant has completed a Department of Labor-approved or Board-approved training program.

TDLR Electrician Division staff understands their experience requirement to be defined by statute and that it does not have the Department of Labor “carve-out” that exists in the Plumbing Rule. In their words, “the on-the-job requirements under a master electrician are statutory law requirements and we cannot change that.”

So, it appears that an amendment will require a bill through the legislature.

Thank you.

From: [Elizabeth Jones](#)
To: [Trisha Linebarger](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, December 18, 2020 4:40:32 PM

From: sunset@sunset.texas.gov On Behalf Of Texas Sunset Commission
Sent: Friday, December 18, 2020 4:37:34 PM (UTC-06:00) Central Time (US & Canada)
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS DEPARTMENT LICENSING AND REGULATION

First Name: Gail

Last Name: Davalos

Title: Program Director

Organization you are affiliated with: Workforce Network, Inc.

Email:

City: Marble Falls

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Recommendations supported.

Any Alternative or New Recommendations on This Agency:

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It is interesting to note that the Journeyman Lineman license (that the Sunset Commission recommends be eliminated) created in 2017 includes the language: " Authorizes the licensee — who must have 7,000 hours of training in a federally approved apprenticeship program or 3.5 years of experience. .

.. " Our above recommendation is to add similar language to the Journeyman Electrician License as an option to incentivize apprentices to enter approved apprenticeship programs. We also recommend that an interim credential for Residential Wireman be added that would incentivize an apprentice to complete two levels of a four level/year apprentice training program and qualify to sit for exam with 1.5 years experience. The first two years/levels of the training program are focused on residential electrical work which matches the scope of work of a Residential Wireman.

Thank you.

My Comment Will Be Made Public: I agree