November 28, 2022

Nevada State Apprenticeship Council
Office of the Labor Commissioner
3300 W. Sahara Avenue, Suite 225
Las Vegas, NV 89102

To: All Members, Nevada State Apprenticeship Council

From: Alan Darney
Training Director
Northern Nevada Electrical Joint Apprenticeship and Training Committee

Re: Nevada State Apprenticeship Council Meeting Agenda, November 29, 2022

On behalf of the Northern Nevada Electrical Joint Apprenticeship and Training Committee (JATC), I would like to formally object to the inclusion on the Nevada State Apprenticeship Council Meeting Agenda on November 29, 2022, of Item 10:

> REVISION OF PROGRAM STANDARDS, OCCUPATION, APPRENTICESHIP AGREEMENT, AFFIRMATIVE ACTION PLAN, QUALIFICATIONS AND SELECTION PROCEDURES
> *(Information/Discussion: For Possible Action)*
>
> Discussion and possible action on the program sponsor's revisions to its previously approved standards with the following proposed occupations.
> Sponsor: Southern Nevada Laborers Training Trust – NV001950001
> Occupation: Construction Craft Laborer – 47-2061.00
> Occupation: Fence Erector – 47-4031.00
> Occupation: Solar Photovoltaic Installer – 47-2231.00

- The Northern Nevada Electrical JATC objects to Agenda Item 10 due to the proposal consisting of multiple unrelated occupations under one program (set of standards). Nevada Revised Statute 610 requires that each program of apprenticeship is for a single occupation, with its own unique written plan (standards), approved by the Council. While the statute permits the sponsorship of multiple programs, the statute

does not permit a single program (standards) to cover multiple occupations of apprenticeship.

- **NRS 610.010 Definitions.**
  6. "Program" means a program of training and instruction as an apprentice in an apprenticeable occupation, as defined in 29 C.F.R. § 29.4.
- **NRS 610.144 Requirements for program to be eligible for registration and approval by State Apprenticeship Council.**
  1. To be eligible for registration and approval by the Council, a proposed program must:
  1.(a) Be an organized, written plan embodying the terms and conditions of employment, training and supervision of one or more apprentices in an apprenticeable occupation, as defined in 29 C.F.R. § 29.4, and be subscribed to by a sponsor who has undertaken to carry out the program.
  1.(d) Provide for the development of skills that are intended to enable an apprentice to engage in a skilled trade generally, rather than for a particular employer or sponsor.
  1.(e)(1) Provisions concerning the employment and training of the apprentice in a skilled trade;
  1.(e)(2)(I) If the program uses a time-based approach, requires the completion of not less than 2,000 hours of on-the-job learning, consistent with training requirements as established by practice in the trade;
  1.(e)(2)(III)(4) Provisions for organized, related and supplemental instruction in technical subjects related to the trade with a minimum of 144 hours for each year of apprenticeship, given in a classroom or through trade, industrial or correspondence courses of equivalent value or other forms of study approved by the Council;
  2. If a program of apprenticeship in a skilled trade is proposed by an employer or association of employers for approval and registration by the Council and the Council has previously approved and registered a program for the skilled trade, the Council shall provide a copy of the proposed program to the sponsor of the approved and registered program and hold a hearing before approving or rejecting the application. The Council shall not approve a proposed program pursuant to this subsection unless the program requires the completion of at least as many hours of on-the-job learning or the demonstration of at least the same number and quality of skills, or both, as applicable, as all existing approved and registered programs in the relevant skilled trade.

  **The Northern Nevada Electrical JATC requests that the Council reject Agenda Item 10 and require the sponsor to propose a program of apprenticeship for each occupation or trade as required by NRS 610.010 and NRS 610.144.**

- The Northern Nevada Electrical JATC objects to Agenda Item 10., Occupation: Solar Photovoltaic Installer - 47-2231.00:
  - Work Experience/ Work Processes do not align with Occupation Tasks. Work Processes are unclear. Work Processes are redundant.
    - O*NET OnLine (https://www.onetonline.org), the U.S. Department of Labors Employment & Training Administrations application that was created for the general public to provide broad access to the O*NET

database of occupational information.

The O*NET database includes information on skills, abilities, knowledges, work activities, and interests associated with occupations. This information can be used to facilitate career exploration, vocational counseling, and a variety of human resources functions, such as developing job orders and position descriptions and aligning training with current workplace needs.

O*NET OnLine lists the top 10 occupation-specific tasks for the occupation of Solar Photovoltaic Installers (O*NET CODE 47-2231.00):

- Install photovoltaic (PV) systems in accordance with codes and standards, using drawings, schematics, and instructions.
- Assemble solar modules, panels, or support structures, as specified.
- Apply weather sealing to array, building, or support mechanisms.
- Determine appropriate sizes, ratings, and locations for all system overcurrent devices, disconnect devices, grounding equipment, and surge suppression equipment.
- Install module array interconnect wiring, implementing measures to disable arrays during installation.
- Identify methods for laying out, orienting, and mounting modules or arrays to ensure efficient installation, electrical configuration, or system maintenance.
- Identify electrical, environmental, and safety hazards associated with photovoltaic (PV) installations.
- Examine designs to determine current requirements for all parts of the photovoltaic (PV) system electrical circuit.
- Check electrical installation for proper wiring, polarity, grounding, or integrity of terminations.
- Test operating voltages to ensure operation within acceptable limits for power conditioning equipment, such as inverters and controllers.

APPENDIX A – SCHEDULE OF WORK EXPERIENCE, Solar Installer Areas of Concentration Work Experience Schedule from the sponsors proposal lists the following items in addition to the Core Work Experience listed elsewhere in APPENDIX A.:

- Solar Installer
    - Solar installers perform the following activities in association with the construction, assembly, installation and maintenance of solar photovoltaic (PV)systems in industrial settings (solar fields) on roofs or other structures. Solar installation may consist of, but not limited to, the following activities.

- Concrete placement – mixing, placement, vibration of concrete, build and place forms, remove and clean forms, cure concrete
- Trenching and excavating
- Grade setting /checking
- Clearing, bucking and falling
- Site preparation/ cleanup and security
- Identify, inspect, use and maintain all tools
    - Hand
    - electric
    - gas
    - pneumatic
    - powder
- Forklift/ equipment operation
- Aerial lift operation
- Fence installation
- Safety policies, equipment maintenance (Daily pre operation maintenance checklist)
- identifying Torque Tubes and H beams
- Layout and post setting
- Identifying PV system components and hardware
- assemble and install hardware to rack systems, torque tubes, H beams and other PV system components

Work processes are unclear. The Concentration Work Experience Schedule in the sponsors proposal covers a extremely small fraction of the tasks for the occupation for the O-NET CODE for Solar Photovoltaic Installer (47-2231.00). The primary elements – and the overwhelming bulk of the occupation tasks are not addressed in the sponsors proposal resulting in inadequate training for an individual working in the occupation of Solar Photovoltaic Installer.

Work processes are redundant. The sponsors Concentration Work Experience Schedule states that "activities in association with the construction, assembly, installation and maintenance of solar photovoltaic (PV)systems in industrial settings (solar fields)" will occur "on roofs or other structures". The Concentration Work Experience Schedule then lists many tasks that seem to take place at ground-level unprepared sites, not "on roofs or other structures".

Several of items listed in the Concentration Work Experience Schedule seem to be duplicate or redundant to items in the CCL Core Work Experience Schedule which is an included part of the sponsors proposed program.

**The Northern Nevada Electrical, JATC requests that the Council reject Agenda Item 10 and, in accordance with NRS 610, require the**

**sponsor to properly submit a proposed program of apprenticeship identifying the proper occupation and O-NET CODE for the proposed occupation and work processes.**

Related Instruction does not align with Occupation Tasks. The required Classroom training outlined in APPENDIX B: SCHEDULE OF RELATED INSTRUCTION; Solar Field Technician, and APPENDIX – B SCHEDULE OF RELATED INSTRUCTION; Construction Craft Laborer Area of Concentration (We believe this is a typographical error and is intended to be "Solar Field Technician Areas of Concentration" as stated in the first paragraph of APPENDIX B) aligns well with the Work Experience Schedules in the proposal, however as stated in the objection above, the related training in the proposal is not adequate for the occupation of Solar Photovoltaic Installer (O*NET CODE 47-2231.00).

**The Northern Nevada Electrical, JATC requests that the Council reject Agenda Item 10 and, in accordance with NRS 610, require the sponsor to properly submit a proposed program of apprenticeship identifying the proper occupation and O-NET CODE for the proposed occupation and related instruction.**

The Northern Nevada Electrical JATC thanks the Nevada State apprenticeship Council for your time, consideration of our requests, and your commitment to quality Registered Apprenticeship in Our great State.

On behalf of the JATC,



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